

**WHATCOM COUNTY
PUBLIC WORKS DEPARTMENT**



NATURAL RESOURCES

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ELIZABETH KOSA
DIRECTOR

TO: Whatcom County Council- Committee of the Whole

THROUGH: Mark Personius, Planning and Development Services Director
Elizabeth Kosa, Public Works Director

FROM: Lauren Clemens, Climate Action Manager

DATE: April 7th, 2026

RE: Whatcom County Comprehensive Plan- Chapter 12- Proposed Staff Amendments

Requested Action: Introduction of Staff Amendments to Chapter 12- Climate Element included in track changes for discussion at the April 7th and 14th Council Committee of the Whole meeting

Background and Purpose

Washington State House Bill HB 1181 requires Washington cities and counties to plan for climate change in local comprehensive plan updates. Jurisdictions that are required to complete a greenhouse gas emissions reduction sub-element can voluntarily request that WA Department of Commerce review the draft element to determine whether it is consistent with the [intermediate planning guidance](#) and RCW 36.70A.070(9)(c). The 2023 Commerce intermediate planning guidance is designated for use by 2025 counties and cities to develop plans and policies as required by RCW 36.70A.070(9).

Washington Department of Commerce's letter sent to Whatcom County on February 13th *Review of County draft climate greenhouse gas emissions reduction subelement* provided several suggestions for Whatcom County Council's consideration. The remainder of the staff memo provides documentation regarding methodology and reasoning for the proposed amendments to Chapter 12. Proposed amendments to the Planning Commission recommendation (1-22-2026) are included in track changes in the draft chapter and highlighted in yellow for Council's consideration as part of the Comprehensive Plan legislative review process.

GHG Reduction Subelement- Background Summary (page 12-3)

Amendment 1: "Consistent with the 2050 statewide net zero greenhouse gas emissions target set by the Washington State Legislature in RCW 70A.45.020 and adopted in Whatcom County Countywide Planning Policy T3, Whatcom County sets the following interim performance indicators for the 2030 Climate Element implementation progress report."

- **Amendment 2:** By 2030, all electric utilities serving retail customers in Whatcom County meet interim targets for greenhouse gas neutrality under WAC 194-40-040.
- **Amendment 3:** By 2030, natural gas utilities serving retail customers in Whatcom County meet each two-year therm conservation target, consistent with RCW 80.28.380.

- **Amendment 4:** By 2030, target 45,174 registered battery electric vehicles (BEVs) and plug-in hybrid electric passenger vehicles (PHEVs) registered in Whatcom County, consistent with the Washington State Electric Vehicle Coordinating Council forecast.
- **Amendment 5:** By 2030, reduce annual vehicle miles traveled per capita across incorporated and unincorporated Whatcom County by 3% to 5,731 VMT per capita.

GHG Reduction Subelement (page 12-10)

- **Amendment 6: Policy 12.7.4- Coordinate with existing utility-run or state administered programs** that provide subsidies for low-income households and landlords to improve energy efficiency, reduce utility costs, and access renewable energy.

Resilience Subelement (page 12-17 and 12-19)

- **Amendment 7: Policy 12.13.4- Evaluate** the installation of distributed generation systems, such as solar with energy storage, microgrids, **or thermal energy networks**, in **new County-owned** critical facilities to ensure energy availability during power outages.
- **Amendment 8: New Policy 12.13.16-** Coordinate with utility providers to identify safe, feasible adaptation measures (e.g. elevated piping, reinforced casing, floodproofing) in floodplains, consistent with state pipeline safety standards.

#1- 2030 Interim Performance Indicators- RCW 36.70A.070(9) requires certain local governments to adopt a greenhouse gas subelement that identifies goals and policies to reduce communitywide greenhouse gas emissions. The WA State Department of Commerce’s Climate Element Planning Guidance - Intermediate Version (December 2023) indicates that “jurisdictions should use 2022 as their emissions baseline year and set incremental targets that lead to achieving net zero emissions in 2050, consistent with Washington’s statewide target.” Whatcom County utilized the [WA Department of Commerce’s Greenhouse Gas Forecast and Scenario Planning Tool v.20260130](#) to identify interim performance indicators for the 2030 Climate Element implementation progress report.

#2- Electricity- [WAC 194-40-040](#), [RCW 19.29A.060](#)

Whatcom County’s electricity is provided to residential, commercial, and industrial customers through four providers countywide- Puget Sound Energy (PSE), City of Blaine, City of Sumas, and PUD-1 of Whatcom County. The Clean Energy Transformation Act applies to all electric utilities serving retail customers in Washington and requires that utilities must eliminate coal-fired electricity by 2025 and be greenhouse gas neutral by 2030. To evaluate progress towards the greenhouse gas neutral target, Whatcom County will utilize publicly available information filed through the UTC in the Fuel Mix and Greenhouse Gas Emission Report. Interim performance reports required for investor-owned utilities will be submitted in July 2026. WA Department of Commerce emissions forecasting projects that CETA compliance would reduce countywide emissions by 782,188 MTCO_{2e}, compared to the business as usual scenario for Whatcom County.

#3- Natural Gas- [RCW 80.28.380](#)

Whatcom County's natural gas is provided to residential, commercial, and industrial customers through Cascade Natural Gas (CNG). RCW 80.28.380 indicates that gas companies have to identify and acquire conservation measures that are available and cost-effective based on conservation potential assessments starting in 2022. [Cascade Natural Gas' Biennial Conservation Plan](#) for 2026-2027 has a 1,042,648 therm reduction goal across the CNG's service territory. The WA Department of Commerce's forecasting analysis supports a 2% reduction in commercial natural gas consumption countywide as an interim performance indicator.

#4- Battery Electric and Plug-In Hybrid Vehicles- [Chapter 173-423 WAC](#)

WA Clean Vehicle regulations (Advanced Clean Cars II) establish zero-emission vehicle standards for sales and lease of passenger cars, light-duty trucks, and medium-duty vehicles. The state interagency electric vehicle coordinating council is responsible for setting targets for achieving the [RCW 43.392.020](#) goal that all publicly owned and privately-owned passenger and light duty vehicles of model year 2030 or later that are sold, purchased, or registered in Washington are electric vehicles. In 2025, there were 5,382 battery electric vehicles and 1,729 plug-in hybrid electric passenger vehicles registered in Whatcom County out of a total of 160,644 registered passenger vehicles (4.4% of all vehicles). Emissions forecasting projects that Clean Vehicles regulations will reduce emissions by 80,588 MTCO_{2e} across Whatcom County, compared to a business as usual scenario, if 65% of all new vehicles registered countywide are zero emission by 2030. In 2025, the EV Coordinating Council revised Whatcom County's forecasted 2027 zero emissions vehicle target downward by [12.25%](#), to reflect actual licensing rates of new vehicles and set a 2030 target of [45,174](#).

#5- Per Capita Vehicle Miles Travelled- [RCW 47.01.440](#)

Local agencies may voluntarily establish performance measures to support statewide transportation system policy goals. RCW 47.01.440 adopts a statewide VMT per capita benchmark to decrease annual per capita vehicle miles travelled by eighteen percent by 2020 and thirty percent by 2035. Average VMT per capita statewide was 7,442 in 2021 ([WSDOT Implementation of VMT Targets and Supporting Actions](#), 2025). Forecasting from WA Department of Commerce supports a 3% countywide reduction towards a 2030 interim performance indicator of 5,731 VMT per capita countywide. Whatcom County's 2022 countywide baseline is 5,908 VMT per capita based on state Highway Performance Monitoring System data.

#6- Utility Assistance Programs-

See Cascade Natural Gas comment letter page 2- amendment to 12.7.4 to clarify that utilities offer and administer state and regulator approved assistance programs.

#7- Distributed Generation & Microgrids-

See Cascade Natural Gas comment letter page 2- amendment to 12.13.4 proposing to add language to explore thermal energy networks (TENS) as part of distributed generation systems, as well as the use of hybrid/dual fuel space and water heating systems, where appropriate.

#8- Gas Infrastructure Retrofit or Relocation-

See Cascade Natural Gas comment letter page 2- relocation or retrofit of gas infrastructure in floodplains should account for technical feasibility, permit requirements, safety standards, and cost constraints. Proposed new policy to address adaptation measures for existing infrastructure.