

APPENDIX H: Climate Policy Gaps Analysis

Date: 2025 Lynden Comprehensive Plan Update
To: Heidi Gudde, Planning Director; Dave Timmer, Planner
From: Katie Cote, AICP, Planning Manager; Rachel Chen, Planner – BHC Consultants
CC: Peak Sustainability Consultant Team, SCJ Alliance Consultant Team
Subject: Audit of Existing Comp Plan and Opportunities for the 2025 Climate Element

1. Background

Peak Sustainability, SCJ Alliance, and BHC Consultants were hired to help The City of Lynden update their Comprehensive Plan for the 2025 Periodic Update Cycle to include a new Climate Element, as required by HB 1181 (2023). HB 1181, adopted as [RCW 36.70A.070\(9\)](#), established additional requirements for Comprehensive Planning under the Growth Management Act (GMA) that include a Climate Element which outlines how cities and counties can increase their resilience to natural hazards and other risks exacerbated by regional changes in climate and decrease their contributions to greenhouse gas emissions. This memo provides an overview of the existing policies in Lynden's Comprehensive Plan that relate to climate resilience or could be updated and strengthened to better meet the requirements and intent of HB 1181 and includes initial recommendations for new goals and policies that should be included in the new element. **The full text of relevant existing policies and edits needed is found in the attached Appendix A – Lynden Climate Policy Gaps Analysis.**

2. Comprehensive Plan Updates Needed to Comply with HB 1181

The following updates to the existing Comprehensive Plan Elements were identified based on a policy gaps analysis and staff direction, and are organized by element:

1. INTRODUCTION

- a. Include an introductory paragraph to the climate element requirements, if all the GMA introductory narratives will be in the Introduction. Otherwise, include a brief overview of climate-related GMA requirements in the new Climate Element.
- b. Integrate relevant policies in the Introduction, such as those identified in Appendix A Climate Policy Audit, in the appropriate elements of the Comprehensive Plan or new Climate Element and strengthen them to better address the City's resilience goals.

2. HEALTH AND WELLNESS

- a. Develop this element to incorporate parks and recreation planning efforts and other facility planning and programming goals consistent with climate resilience goals.
- b. Include new content, goals, and policies that connect the City's vision to community health, wellness, safety, aesthetics, resilience, and access to healthcare and green spaces.

3. CLIMATE ELEMENT

- a. Draft new goals and policies to adapt to and mitigate the effects of a changing climate, address climate-related vulnerabilities, and bolster existing resilience efforts in the City. **HB 1181 requires that the climate element is developed to:**

APPENDIX H: Climate Policy Gaps Analysis

- i. Support reductions in greenhouse gas emissions and per capital vehicle miles traveled.
 - ii. Prepare for and enhance the City's resiliency to climate impacts and natural hazards exacerbated by climate change.
 - iii. Protect and enhance environmental, economic, and human health and safety.
 - iv. Advance environmental justice.
 - b. Incorporate any policies from the existing Comprehensive Plan that relate or are strengthened to address community-wide resilience.
 - c. Provide context for local climate impacts and community resilience in the city through various graphics and data visualization methods.
4. LAND USE ELEMENT
 - a. Strengthen existing policies from the Land Use Element that relate to climate resilience or move them to the Climate Element where appropriate.
 - b. Draft new policies to complement the goals and policies in the Climate Element and to meet the following requirements of HB 1181:
 - i. Prioritize environmental justice and avoid worsening environmental health disparities in Lynden.
 - ii. Reduce and mitigate the risk to lives and property posed by wildfires using land use planning.
 - iii. Reduce vehicle miles traveled in Lynden, without increasing greenhouse gases elsewhere, through land use planning.
 - iv. Designate green spaces and urban and community forests within the UGA.
5. HOUSING ELEMENT
 - Strengthen existing policies from the Housing Element that relate to climate resilience or move them to the Climate Element where appropriate. For instance, policies that address infill development, prevent displacement, and increase the supply of housing available to all income levels may contribute to community resilience.
 - New housing policies fostering climate resilience may be drafted where applicable to address the resilience of housing to natural hazards or climate impacts like extreme heat.
6. UTILITIES ELEMENT
 - Strengthen existing policies from the Utilities Element that relate to climate resilience or move them to the Climate Element where appropriate. For instance, existing utilities policies that relate to energy conservation, waste management, and the reliability of utility providers may contribute to community resilience.
 - New utility policies fostering climate resilience may be drafted where applicable to address the resilience of utility services and infrastructure in the city.
7. CAPITAL FACILITIES ELEMENT
 - a. Strengthen existing policies from the Capital Facilities Element that relate to climate resilience or move them to the Climate Element where appropriate.
 - b. Draft new policies in the Capital Facilities Element to complement the goals and policies in the Climate Element and meet the requirements of HB 1181, which requires the Capital Facilities Element to include, as part of the capital facilities inventory of

APPENDIX H: Climate Policy Gaps Analysis

publicly owned facilities, an inventory of green infrastructure that shows the location and capacities of the facilities.

8. TRANSPORTATION ELEMENT

- a. Coordinate with Transpo Group, who is responsible for updating the Transportation Element, to ensure the Transportation Element includes any climate resilience policies identified throughout the development of the Climate Element.
- b. Ensure any climate-related policies drafted by Transpo are cross-referenced with the Climate Element where appropriate. HB 1181 requires that the transportation element encourages efficient multimodal transportation systems that will reduce greenhouse gas emissions and per capita vehicle miles traveled.

The above items provide a general scope of updates and proposed changes to existing elements as part of the 2025 Comprehensive Plan update. A more detailed review of the climate-related policies in the existing Comprehensive Plan, including some initial proposed redlines to strengthen them, can be found in the attached Appendix A – Lynden Climate Policy Gaps Analysis.

3. Climate Policy Audit

Our analysis shown in detail in Appendix A included review of the following source documents:

- Lynden Comprehensive Plan
- Lynden-Specific Strategies of the Whatcom County Hazard Mitigation Plan
- Lynden Shoreline Master Program.

Our analysis lists the relevant policies from the source documents and assigns each policy into a category reflecting an overarching goal of the new Climate Element (see the column “Applicable Climate Goal Category”). These policy categories, shown as A- M below, correspond to those found in the Commerce Menu of Measures, with the exception of except for the bolded items J-M, which were identified based on preliminary discussions with City staff.

- A. Agriculture and Food Systems
- B. Zoning and Development
- C. Buildings and Energy
- D. Transportation
- E. Ecosystems
- F. Economic Development
- G. Cultural Resources and Practices
- H. Water Resources/Flooding
- I. Health and Wellbeing
- J. Infrastructure**
- K. Natural Hazards**
- L. Emergency Response and Community Networks**
- M. Carbon Sequestration**

Relevant policies from the existing Comprehensive Plan will be strengthened, nested, or cross-referenced under these policy areas, and new policies will be drafted to address policy gaps, as

detailed in Appendix A and summarized in Section 4 of this memo. Areas of new policies will continue to be added throughout the development of the Climate Element, depending on outreach and further discussions with City staff.

4. Climate Policy Gaps Summary of New Goals

Under HB 1181 and as adopted in [RCW 36.70A.070\(9\)](#), the Climate Resilience Sub-Element, at a minimum, must address the natural hazards specific to Lynden; identify, protect, and enhance natural areas to foster climate resilience; and identify, protect, and enhance community resilience to climate impacts. The Greenhouse Gas Reduction Sub-Element, at a minimum, must result in overall greenhouse gas (GHG) emissions reductions, reduce per capita vehicle miles traveled (VMT), and prioritize reductions that benefit overburdened communities and environmental justice.

Based on a review of existing plans, a brief initial review of climate-exacerbated and natural hazards in Lynden, and a discussion with City staff regarding priorities for the new Climate Element, our analysis identified the following gaps to address through new goals, policies, and background information. Additional policy categories may be identified following the full inventory of climate assets and vulnerabilities (Task 7) and community outreach.

- A. **Agriculture and Food Systems.** New policies should address sustainable agriculture practices and water resource management.
- B. **Zoning and Development.** New zoning and development policies should address the built environment's resilience to natural hazards or climate impacts such as flooding, wildfires and wildfire smoke, drought and overall changes in precipitation, and extreme heat.
- C. **Buildings and Energy.** New policies should be drafted to address electrification and electric vehicle charging, increasing energy efficiency, and to address energy supply and management concerns.
- D. **Transportation.** New policies should be developed, in coordination with Transpo Group, to ensure that the local transportation system is resilient to climate impacts and extreme weather events.
- E. **Ecosystems.** New policies should address how Lynden is preserving and enhancing local ecosystems.
- F. **Economic Development.** New policies should be drafted to prioritize the support of local businesses to promote overall resilience to climate-related hazards and disruptions.
- G. **Cultural Resources and Practices.** New policies should be drafted to support overburdened and frontline communities and ensure that they are involved in climate resilience discussions and are effectively communicated with. Policies should also support the equitable distribution of funding and resources to help increase the City's overall resilience.
- H. **Water Resources/Flooding.** New policies should address the City's flooding and water resource concerns, prioritizing climate friendly stormwater management and flood mitigation techniques where feasible. Policies should include strategies to prevent or mitigate flooding where possible and help the City recover from flooding events.
- I. **Health and Wellbeing.** New policies to foster health and wellbeing among the community can be included as part of the Climate Element if applicable or cross-referenced with those in the new Health and Wellness Element of the Comprehensive Plan.
- J. **Infrastructure.** New policies should bolster the City's infrastructure and its resilience to climate impacts and natural hazards.

APPENDIX H: Climate Policy Gaps Analysis

- K. **Natural Hazards.** New policies in the Climate Resilience Sub-Element should include policies addressing each natural hazard that Lynden faces, which will be identified through the inventory of community assets and vulnerabilities.
- L. **Emergency Response and Community Networks.** New policies could include strategies to increase collaboration and cooperation between City agencies, the public, neighboring jurisdictions, and other community organizations, which can contribute to the formation of strong community networks. Increased collaboration to establish community networks and emergency response strategies can foster a more equitable space for the development of community-wide protocols that ensure historically marginalized or frontline communities are not disproportionately impacted.
- M. **Carbon Sequestration.** New policies could include strategies to increase carbon sequestration, including managing the existing tree canopy and increasing trees and vegetation. These policies should prioritize areas that experience more heat because of the lack of vegetation or increased proportion of hardscaping. Policies related to increasing carbon sequestration may also provide co-benefits including public health benefits like protecting community members from extreme heat, increasing aesthetics through greenery, and providing additional habitat and other ecosystem services like regulating air quality.

Additional updates may be determined based on further discussions with City staff, the Climate Advisory Group, and other community outreach efforts, as well as the completion of the community assets and vulnerabilities inventory and analysis taking place as part of this periodic update.