



City of Sumas Request for Council Action

Meeting Date: August 11, 2025

Subject:

Approval of Countywide Planning Policies (CWPP)

Department: Planning

Prepared By: Carson Cortez

Agenda Location:

☐ Public Hearing ☐ Old Business ☒ New Business ☐ Staff Reports

Brief Summary:

The Countywide Planning Policies are a set of policies crafted by the County and City planning departments which guide development of all the different Comprehensive Plans. The Washington State Growth Management Act (GMA) requires that the Comprehensive Plans of all jurisdictions within a county need to be coordinated and consistent with one another. These CWPPs ensure that all the jurisdictions produce Comprehensive Plans that are coordinated and consistent with all the others.

The decision for the City Council is whether or not to adopt these CWPPs. As stated above, these CWPPs were drafted by the County and City planning departments. A core group of planners, including Rollin Harper, were the main authors of this update, while the other planners reviewed and approved the changes that they made. The CWPP's were passed by the Whatcom County Council on May 27, 2025, and now go to the cities for ratification.

Legal Review: ☐ Reviewed ☒ Not Reviewed ☐ Review Not Required

Staff Recommendation:

Staff recommends adoption of the Countywide Planning Policies

Senior Staff Review:

- ☐ Mayor
- ☐ Finance Director
- ☒ City Clerk
- ☐ Public Works Director

Budget Implications:

- ☐ Current Budget
- ☐ New Budget Request
- ☒ Non-Budgetary

Appendix C
Countywide Planning Policies

Whatcom County
Countywide Planning Policies
Adopted April 1993

(Revised March 11, 1997, January 25, 2005, and February 9, 2021)

A. Citizen-Public Involvement

1. The ~~e~~County and the cities shall cooperate to provide public education on the requirements of the Growth Management Act.
2. The ~~e~~County and the cities shall provide opportunities for ~~citizens-the public~~ to become involved in the growth management planning process through various mechanisms, such as surveys, public workshops, meetings, hearings, and advisory committees. The method of ~~citizen-public~~ involvement may vary based on the needs and constituents in various communities and shall include representation of both rural and urban interests on those issues that affect both urban and rural areas.
3. ~~Citizens-The public~~ shall be notified in a timely manner of opportunities to have input and key decision points in the planning process. This should include actions such as ~~use of on-line resources, notification lists, use of telephone hotlines, notification to interest groups, pre-development meetings, early timely consideration~~incorporation of public comments, ~~and~~ broader notification of property owners and residents during a planning process, ~~and as well as working more extensively with~~ notification to community and neighborhood groups. The cities shall also develop a public participation process to solicit and ~~consider~~incorporate comments from residents outside city limits but within existing and proposed Urban Growth Areas.

Rationale for Changes: The County has a “notify me” list that people can sign up for various email lists. Telephone hotlines are generally not used. The Growth Management Act states that “. . . a ‘countywide planning policy’ is a written policy statement or statements used solely for establishing a countywide framework from which county and city comprehensive plans are developed and adopted . . .” (RCW 36.70A.210(1)). Countywide Planning Policies relate to the comprehensive plan adoption process, rather than to the permit review process. Therefore, “pre-development meetings” should be removed.

4. ~~Citizen-Public~~ comments and viewpoints shall be considered in ~~incorporated into~~ the decision-making process in development of draft plans and

regulations. Consideration of ~~citizen-public~~ comments shall be evident in the decision-making process.

Rationale for Changes: The County Council, city councils, and public officials consider public comments when updating comprehensive plans. However, there are times when such comments may be diametrically opposed to one another. There may be other times when council members, duly elected by a majority of the citizens, may not think that public comments from individual community members reflect the good or viewpoints of the community at large. Therefore, it should be acknowledged that, while council members will consider public comments, they are not bound to follow them.

5. The ~~e~~County and the cities shall establish a system for ~~subarea~~, community and neighborhood liaison to foster communication between the respective government and its neighborhoods. This system would also provide a point of contact for issues that may affect ~~subareas~~, the community, or neighborhoods.

Rationale for Changes: The County has repealed a number of Subarea Plans. Communication between the local government and the affected community or neighborhood is sufficient.

6. Various planning techniques, such as overlay maps and Geographic Information Systems, shall be utilized to allow ~~citizens-the public~~ and public officials to evaluate planning proposals and provide the ability to make accurate comparison of issues so appropriate trade-offs can be consciously made.

Rationale for Changes: Planning techniques, such as use of GIS, can be used in a variety of ways to evaluate planning proposals. Therefore, the language has been modified as shown above.

B. Urban Versus Rural Distinctions

1. Whatcom County shall primarily become a government of rural areas in land use matters directed towards agriculture, forestry and other natural resources and natural resource based industries. The county ~~shall~~may work with ~~the public~~citizens to ~~further~~ define ~~or modify~~a variety of types of rural areas based on the characteristics and needs of different areas. This Section shall not preclude ~~e~~County governance of large urban industrial areas outside of the city UGA's (see Cherry Point below), ~~developed urban areas within~~urban growth areas not yet annexed ~~or incorporated~~, and developed rural areas where the "urban" designation is inappropriate.

Rationale for Changes: The Whatcom County Comprehensive Plan already defines a variety of types of rural areas. The County has jurisdiction over the portions of the UGAs associated with the seven cities that have not yet been annexed. The County also has jurisdiction over the three non-city UGAs (Birch Bay, Columbia Valley, and Cherry Point). The County has jurisdiction over all areas in these UGAs, regardless of whether they are developed or undeveloped areas.

2. The ~~e~~County shall discourage urban level or high intensity development outside Urban Growth Areas, ~~and limited areas of more intensive rural development (LAMIRDS), and vested plats outside of areas currently characterized by a development threshold greater than a rural development density.~~

Rationale for Changes – Urban level development and higher intensity development should only be allowed in UGAs, LAMIRDS, and previously approved subdivisions. This should be clearly stated.

3. Whatcom County shall promote appropriate land uses and allow for infill within ~~LAMIRDS rural settlements characterized by existing commercial, industrial and intensive residential development greater than a rural development density.~~ These areas ~~have been~~ should be clearly delineated, and will not ~~be~~ expanded beyond logical outer boundaries in accordance with RCW 36.70.070(5). ~~Impacts on rural character, critical areas and other economic considerations as well as the availability of capital facilities and rural levels of service must be considered before allowing infill in these areas.~~

Rationale for Changes: Referencing LAMIRDS more clearly identifies the areas where rural infill is being promoted. LAMIRDS have already been delineated and development regulations adopted. The Growth Management Act states that “. . . a ‘countywide planning policy’ is a written policy statement or statements used solely for establishing a countywide framework from which county and city comprehensive plans are developed and adopted . . .” (RCW 36.70A.210(1)). Countywide Planning Policies relate to the comprehensive plan adoption process, rather than to the permit review process. Therefore, the last sentence should be deleted.

4. In the next 20 years, Whatcom County should discourage "new fully contained communities" (as defined and authorized by RCW 36.70A.350) outside designated Urban Growth Areas.

5. Whatcom County ~~should~~may undertake a public process to further define or modify rural areas and rural growth as distinct from ~~urban areas and~~ urban growth areas.

Rationale for Changes: Whatcom County's Comprehensive Plan now defines and distinguishes between rural and urban growth. The above policy, as revised, would address future modifications.

C. Urban Growth Areas

1. Urban growth needs shall be met by a combination of in-fill within cities and by growth within designated ~~city~~municipal and ~~non-city~~non-municipal Urban Growth Areas.

Rationale for Change: The term "city urban growth area" is used in the Whatcom County Comprehensive Plan and substituting this term would likely make the above text easier to understand.

2. The size and location of Urban Growth Areas shall be consistent with the Growth Management Act, adopted local policies and ~~with the~~ capital facilities plans.

Rationale for Changes: The Growth Management Act imposes requirements that local governments must meet when determining the size and location of UGAs.

- 3a. The County and Cities will work together to develop countywide population and housing need projections, and associated allocations to Urban Growth Areas, that are within the range of the Washington State Office of Financial Management projections. The County and Cities will also work together to develop countywide employment projections and associated allocations to Urban Growth Areas.~~The most current, accurate population projections based on a range provided for Whatcom County by the Office of Financial Management shall. These allocations will be used to determine whether as the basis for determining that~~ Urban Growth Areas ~~shall~~ include sufficient land capacity~~area~~ to permit the urban growth that is projected to occur in the ~~e~~County for the succeeding twenty-year period.

Rationale for Changes: The amendments above more clearly state the process for developing countywide projections and UGA allocations. Additionally, it references "land capacity" that consists of both buildable area *and densities* in the UGA.

- 3b. The County and Cities shall develop a Land Capacity Analysis Methodology, which is a consistent approach to calculating the land supply needed within an urban growth area. ~~This approach shall~~ The Land Capacity Analysis Methodology will consider limitations imposed by critical area regulations, infrastructure needs, open space, existing uses, local market factors and the ability of the jurisdiction to provide services. It is recognized that the above limitations may vary by jurisdiction, but the method for applying them shall be consistent. Urban growth areas shall permit a range of densities and uses; however, ~~in recognition of community character,~~ these uses and densities may vary among jurisdictions.

Rationale for Changes: The County and cities have called the referenced approach the "Land Capacity Analysis Methodology." In response to the State Department of Commerce's *Guidance to Address Racially Disparate Impacts* (April 2023), the above reference to "community character" has been deleted.

4. Urban Growth Areas shall be evaluated in the timeframes set forth in the Growth Management Act ~~at least every ten years~~ to determine if they contain sufficient ~~land capacity~~ area to accommodate the urban growth that is projected for the succeeding twenty-year period. The market factor for each Urban Growth Area shall also be evaluated. The Land Capacity Analysis will be used to determine whether the land supply is adequate to meet the needs of the community or whether the land supply is excessive ~~and contributing to sprawl~~.

Rationale for Changes: The Growth Management Act governs how often UGAs need to be reviewed/updated (and this has changed from time to time). UGAs need to have sufficient land capacity, which consists of both area *and densities*. The Land Capacity Analysis shows whether the land supply is adequate or not. The market factor is one component of the Land Capacity Analysis, but there are other important components that go into determining the capacity of land to accommodate growth. Finally, the Growth Management Act requires that UGAs be sized to accommodate the 20-year growth allocations (basically, no more and no less). Land supply can be excessive while still not contributing to sprawl. County zoning typically does not allow low-density sprawl in UGAs.

5. Urban Growth ~~a~~Areas should be established in a way that preserves agricultural land, forestry, mineral resources, treaty natural resources (e.g. salmon, wildlife, traditional foods), tribal cultural resources, water resources, and critical areas. Urban growth shall maintain proper buffers from natural resource areas to minimize conflicts with natural resources and industries based on them. Any proposed UGA expansion in the 100 year floodplain must

comply with RCW 36.70A.110. Any proposed UGA expansion should minimize risks posed by natural hazards.

D. City Urban Growth Areas

1. The Urban Growth Areas for the small cities shall be of an adequate size to allow them to become viable economic centers with a balance of jobs and housing. The small cities shall do appropriate planning to ensure adequate distribution of land uses and services at a range of urban densities and zoning classifications.
2. Urban Growth Areas for cities shall include those areas contiguous to cities that are suitable for urban growth as set forth in~~and with urban characteristics as defined by the Growth Management Act. The Geneva area in Bellingham's UGA is characterized by urban development, but is also identified by the city and county as a Water Resource Protection UGA because of its location in the Lake Whatcom Watershed. Lake Whatcom is the drinking water source for much of the Bellingham urban area. Geneva is appropriate to include in an urban growth area, but is not an area where additional urban development is desirable.~~

Rationale for Changes: The term "urban growth" is defined and used in the Growth Management Act (for example, see RCW 36.70A.030(28)). The term "urban characteristics" is not defined or used in the Growth Management Act. The Planning Commission passed a motion on January 23, 2025 to delete the language relating to the Geneva UGA.

3. Cities shall develop a plans~~s~~ to provide urban level water and sewer services within their Urban Growth Areas. ~~This~~ These plans should be developed in cooperation with existing water and sewer purveyors ~~and other municipal corporations providing water or sewer services~~ within each city's Urban Area, and may~~should~~ be implemented through interlocal agreements. ~~Short term and long term boundaries may be used to facilitate provision of urban levels of service and to not preclude future urban densities as defined within the Whatcom County Comprehensive Plan.~~

Rationale for Changes: Water system plans and sewer plans are typically separate documents. Cities and water/sewer purveyors may choose to enter into interlocal agreements or may coordinate in other ways. Short term and long term planning areas no longer exist in the Whatcom County Comprehensive Plan or Zoning Code.

4. Existing cities should accommodate~~absorb~~ additional housing~~population~~ at a range of densities appropriately responsive to the city's community vision before extending city Urban Growth Areas into areas where growth would

adversely impact critical areas and resource lands. In those small cities entirely or almost entirely surrounded by flood plains, critical area and resource lands or within Shellfish Protection Districts, the eCounty and cities~~the city~~ shall seek to negotiate a balance between protection of resources and the allocation of adequate land area to meet the growth needs of the city~~and to maintain the desired character of the community~~.

Rationale for Changes: The cities of Everson, Nooksack and Lynden are largely, but not entirely, surrounded by floodplain and resource lands. The change allows the above policy to apply to these cities (Sumas is entirely surrounded). In response to the State Department of Commerce's *Guidance to Address Racially Disparate Impacts* (April 2023), the above reference to "character of the community" has been deleted.

5. All cities should grow in an efficient manner~~while maintaining their character~~ and, where reasonable, shall provide for adequate open space between cities ~~to prevent strip development~~.

Rationale for Changes: In response to the State Department of Commerce's *Guidance to Address Racially Disparate Impacts* (April 2023), the above reference to maintaining "character" has been deleted. "Strip development" can be defined as linear commercial development along a public highway that includes three or more of the following characteristics: broad road frontage, predominance of single-story buildings, limited reliance on shared highway access, lack of connection to any existing settlement except by highway, lack of connection to surrounding land uses except by highway, lack of coordination with surrounding land uses, and limited accessibility for pedestrians ([Law Insider](#)). Two cities growing together wouldn't necessarily lead to strip development.

6. Cities should be encouraged to provide positive incentives for in-fill.

E. Non-City Urban Growth Areas

1. Urban Growth Areas ~~have been~~may also be established in areas that are not contiguous to existing cities, and are already characterized by urban growth where adequate facilities and services can be provided~~and which are intended to meet needs not met by cities and their Urban Growth Areas. These are the Birch Bay, Cherry Point, and Columbia Valley UGAs.~~

Rationale for Changes: Whatcom County adopted three non-city UGAs in the 1990s: Birch Bay, Columbia Valley, and Cherry Point. While these UGAs may meet some countywide needs not met by cities (e.g. heavy

industry at Cherry Point), they were primarily adopted to recognize the existing urban uses and future potential to accommodate urban growth.

2. Non-city urban growth areas, for already urbanized unincorporated residential areas, shall be encouraged to infill in a way that will facilitate efficient provision of facilities and services consistent with the scale of development.
3. Cherry Point shall be designated as an unincorporated industrial urban growth area in recognition of existing large scale industrial land uses. Additional large scale development shall be encouraged consistent with the ability to provide needed services and consistent with protecting critical areas along with other environmental protection considerations. The Cherry Point industrial area is an important and appropriate area for industry due to its access to deep water shipping, rail, all-weather roads, its location near the Canadian border, and its contribution to the County's goal of providing family wage jobs.
4. The County shall assure that there are plans to provide appropriate levels of urban facilities and services within non-city Urban Growth Areas. These plans should be developed by special purpose districts, water associations and private service providers within each of these Areas, and ~~may~~ should be implemented, where appropriate, through interlocal agreements. ~~Short-term and long-term boundaries may be used to facilitate provision of urban levels of service.~~

Rationale for Changes: The County and water purveyors may choose to enter into interlocal agreements or may coordinate in other ways. Short term and long term planning areas no longer exist in the Whatcom County Comprehensive Plan or Zoning Code.

F. Contiguous, Orderly Development and Planning in Urban Growth Areas

1. Cities, ~~and~~ the ~~e~~County ~~and special districts~~ shall execute interlocal agreements to coordinate plans for and manage growth in Urban Growth Areas prior to annexations. Interlocal agreements shall acknowledge and implement the Countywide Planning Policies.

Rationale for Change: The Growth Management Act states that “. . . a ‘countywide planning policy’ is a written policy statement or statements used solely for establishing a countywide framework from which county and city comprehensive plans are developed and adopted . . .” (RCW 36.70A.210(1)). Special purpose districts are not subject to the Countywide Planning Policies. Counties and cities cannot, through adoption of a countywide planning policy, require a special purpose district to enter into an interlocal agreement.

2. Interlocal agreements shall incorporate clear and reasonable criteria for orderly annexation. The ~~e~~County and the cities shall establish a process to consider incorporate representative citizen public input as part of into the interlocal agreement approval processes and, if appropriate, encourage ~~appropriate~~ districts to participate. If adequate procedures are developed to replace it, the Boundary Review Board may be replaced.

Rationale for Changes: There may be interlocal agreements that do not involve special purpose districts. The above change gives the County and cities discretion to ask districts to participate as appropriate.

3. All urbanized areas currently within urban growth boundaries associated with cities should be encouraged to annex to cities. Orderly annexations with logical boundaries ~~are~~shall be encouraged. Interlocal agreements shall specify guidelines on size, timing of annexations and urban levels of development, and tax revenue sharing when appropriate.
4. Within Urban Growth Areas, cities shall not extend water and sewer utilities without an adopted program for annexation and an adopted Capital Facilities Plan. Exceptions may be made in cases where human health is threatened as determined by the County Health Department. If water extensions are made, they shall be consistent with the service area boundaries and other provisions within the adopted Coordinated Water System Plan.
5. In the areas where utilities presently extend beyond city limits, but are within Urban Growth Areas, the city, ~~e~~County, and the existing water purveyors for the area should coordinate planning efforts~~jointly plan with the county. The County shall adopt zoning which reflects this joint planning.~~

Rationale for Changes: The County has already adopted zoning within all UGAs.

6. Unless specifically provided for by state statutes, Cities, ~~other municipal corporations, and other public and private utilities~~ shall not extend urban levels of water service to serve urban uses outside Urban Growth Areas. If legally allowed water extensions are made outside of Urban Growth Areas, the maximum number of connections shall not exceed the density allowed under the associated zoning. The number of connections shall be specified in a legally binding document at the time the extension is approved. Property contiguous to extension of utilities necessary to solve existing water deficiencies, but which cannot benefit from them because of zoning constraints, shall not be assessed for those improvements.

Rationale for Changes: Countywide planning policies apply to cities but not to other water purveyors.

7. The availability of pipeline capacity required to meet local needs and/or supply shall not be used to justify comprehensive plan and/or rezone applications that propose more intensive land use development counter to the countywide land development pattern and shall not be considered in conversions of agricultural land, forestry, and rural areas.

Rationale for Change: The Growth Management Act states that “. . . a ‘countywide planning policy’ is a written policy statement or statements used solely for establishing a countywide framework from which county and city comprehensive plans are developed and adopted . . .” (RCW 36.70A.210(1)). Countywide Planning Policies do not apply directly to development. Additionally, the term “conversions” is undefined. The above change clarifies when pipeline capacity should not be used to support a comprehensive plan and/or zoning map amendment.

8. The cities, ~~other municipal corporations, public utilities,~~ and the ~~e~~County shall cooperate to identify and balance the needs of each jurisdiction and entity when planning for transition of services and annexation within Urban Growth Areas. The cities and the County should coordinate with special purpose districts and other service providers in this process. This intergovernmental cooperation and coordination ~~may~~should be reflected in revenue agreements, work programs for joint projects, and regional solutions adopted by the affected parties.

Rationale for Changes: The Growth Management Act states that “. . . a ‘countywide planning policy’ is a written policy statement or statements used solely for establishing a countywide framework from which county and city comprehensive plans are developed and adopted . . .” (RCW 36.70A.210(1)). Other municipal corporations and public utilities are not subject to the Countywide Planning Policies. However, the County and cities may coordinate with service providers, as necessary. Substituting the word “may” for “should” gives the County and cities flexibility in fashioning solutions appropriate for the situation.

9. Major transportation, utility and greenway corridors shall be planned within Urban Growth Areas. ~~Development shall be consistent with these corridors. The county shall ensure conformance through the permit process and incentive programs.~~

Rationale for Changes: The Growth Management Act states that “. . . a ‘countywide planning policy’ is a written policy statement or statements used solely for establishing a countywide framework from which county

and city comprehensive plans are developed and adopted . . .” (RCW 36.70A.210(1)). Countywide Planning Policies relate to the comprehensive plan adoption process, rather than to the development and the permit review process.

10. Interlocal agreements shall include a process for reviewing provisions for agreed-upon development standards within Urban Growth Areas. ~~Unless a different standard is negotiated, the more rigorous of the standards shall be enforced by the county.~~

Rationale for Changes: The County would need to duly review and adopt development standards before enforcing such standards within the unincorporated portion of the UGA. Development standards cannot be enacted through an interlocal agreement.

- ~~11. The county and the City of Bellingham shall establish, through the Urban Fringe Subarea Plan update, the policies, zoning and criteria to comply with current state Growth Management law.~~

Rationale for Changes: The County and cities comply with the Growth Management Act through adopting and updating their respective comprehensive plans. Because the Whatcom County Comprehensive Plan contains goals and policies relating to UGAs, rural lands, agricultural lands, etc., the County has repealed a number of subarea plans (subarea plans are optional under RCW 36.70A.080(2)). Deleting the above policy would give the County and City of Bellingham the flexibility to review and decide whether the Urban Fringe Subarea Plan is still needed.

- ~~12.11.~~ To encourage contiguous, orderly development and annexation of residential lands in Urban Growth Areas around cities, the ~~County~~ shall designate Urban Residential or other zones limiting density to a maximum of one dwelling unit per ~~ten~~ five acres ~~in undeveloped areas until public water and sewer urban-level utilities are provided. Developed or partially developed areas presently zoned Residential Rural shall retain that zoning. In the Bellingham Urban Growth Area, substantial development and subdivisions already have occurred without annexation. The revised Urban Fringe Subarea Plan and a new Interlocal Agreement between the City of Bellingham and the county will address sequence and timing for annexations, subdivisions, and urban levels of development.~~

Rationale for Changes: The Urban Residential zone has been amended to only allow one dwelling/ten acres when public water and sewer are

not provided, to ensure more efficient urban development when such services become available (typically upon annexation). There is no Residential Rural zoning in UGAs anymore. The existing interlocal agreement addresses annexations and development in the UGA.

- ~~13.12. In Urban Growth Areas where development is occurring based on the presence of utilities, urban development shall meet common urban standards including fire flow requirements and supply. The county and the cities will work together to develop reasonable standards over time.~~

Rationale for Changes: The Growth Management Act states that “. . . a ‘countywide planning policy’ is a written policy statement or statements used solely for establishing a countywide framework from which county and city comprehensive plans are developed and adopted . . .” (RCW 36.70A.210(1)). Countywide Planning Policies relate to the comprehensive plan adoption process, rather than to the development in the UGA.

- ~~14.13. The County and the cities shall coordinate drainage, stormwater management and flood control in Urban Growth Areas and work toward the development of common standards.~~

Rationale for Change: The County and cities have adopted and apply standards for their respective jurisdictions.

G. Affordable Housing

1. The eCounty and the cities shall take actions to ensure a balance of housing and economic growth consistent with each jurisdiction’s employment base and diverse income levels and to reduce commuting times and traffic congestion.
2. The eCounty and the cities shall identify sufficient capacity of land for a healthy mix of home types, sizes, and prices, including but not limited to ownership opportunities for the widest possible range of incomes, income-restricted housing, manufactured housing, multifamily housing, co-living housing, farmworker housing, group homes, foster care facilities, emergency housing, emergency shelters, and permanent supportive housing and other supportive housing types~~plan for a range of housing types and costs commensurate with their affordable housing needs.~~

Rationale for Change: The Growth Management Act requires that countywide planning policies must address “Policies that consider the need for affordable housing, such as housing for all economic segments of the population and parameters for its distribution” (RCW 36.70A.210(3)(e)). In a letter of March 15, 2024, the Whatcom County Housing Advisory Committee recommended changes to the Countywide Planning Policies. The City/County Planner Group concurs with these

changes, with the addition of references to “co-living housing” and “farmworker housing.”

3. Affordable housing should be convenient to major employment centers and public services or be designed to accommodate public transportation.
4. The eCounty and the cities shall promote innovative techniques and develop strategies to provide for affordable housing with design, density, lot sizes and development standards that provide for a variety of housing types.
5. The eCounty and the cities shall review existing regulations and policies that exclude or discourage multi-family, co-living housing, farmworker housing, low-income, and permanent supportive housing and emergency housing and shelter affordable housing in their communities and reduce any identified barriers; theyand shall not adopt regulations and policies which do so. Mobile, modular, and manufactured homes on individual lots, mobile home parks, accessory units, inclusionary zoning, mixed use, and increased densities shall be reviewed as affordable housing alternatives.

Rationale for Change: In a letter of March 15, 2024, the Whatcom County Housing Advisory Committee recommended changes to the Countywide Planning Policies. The City/County Planner Group concurs with these changes, with the following modifications:

- Insert “co-living housing;”
 - Insert “farmworker housing;”
 - Insert “permanent” before supportive housing;
 - Insert “emergency housing” before shelter.
6. The eCounty and the cities ~~should~~ shall work together, and with the private sector, other public and non-profit agencies, ~~citizen-community~~ groups, and trade representatives to plan for a regional distribution of housing for all income levels, including permanent supportive housing types and emergency housing and shelter for very low-income households~~assure that there is an adequate supply of sites available for affordable housing and to encourage housing design that is compatible with the surrounding neighborhoods.~~

Rationale for Change: In a letter of March 15, 2024, the Whatcom County Housing Advisory Committee recommended changes to the Countywide Planning Policies. The City/County Planner Group concurs with these changes, with the following modifications:

- Replace “assure” with “plan for;”
- Insert “permanent” before supportive housing;
- Insert “emergency housing” before shelter.

7. Low income, multi-family and diverse and supportive housing options shall not be concentrated in only a few communities or neighborhoods.

Rationale for Change: In a letter of March 15, 2024, the Whatcom County Housing Advisory Committee recommended changes to the Countywide Planning Policies. The City/County Planner Group concurs with these changes. The County Council added "Low income" back in the above policy.

8. The eCounty and the cities shall consider reducing impact and/or mitigation fees for affordable housing provided in a proposed development.

9. ~~Each jurisdiction should explore options for providing shelter for the homeless.~~

Rationale for Change: In a letter of March 15, 2024, the Whatcom County Housing Advisory Committee recommended deleting this Countywide Planning Policy. The City/County Planner Group concurs with this change, as emergency shelter is addressed in the policies above.

H. Open Space/Greenbelt Corridors

1. Adequate open space is vital to the quality of life and sense of place in Whatcom County. The eCounty, cities, Port of Bellingham, and other appropriate jurisdictions should coordinate protection of linked greenbelts, within and between Urban Growth Areas, parks, and open space to protect wildlife corridors, provide flood resilience, support infiltration of water, and to enhance recreational opportunities, public access and trail development.
2. The eCounty and the cities shall plan for greenbelts and open space in their Comprehensive Planning processes and coordinate with each other. Open space systems should include lands which contain natural areas, habitat lands, natural drainage features, and/or other environmental, cultural and scenic resources. With increased residential densities, jurisdictions also should ensure provision of adequate neighborhood parks and play areas within safe bicycling and walking distance for children.
3. The eCounty and the cities shall encourage, to the extent it is feasible, separation of Urban Growth Areas through planning, zoning, development regulations, open space purchase, conservation easements and other mechanisms which may be appropriate. ~~Also, an array of i~~ncentives such as density bonuses, design flexibility, density credit/fee in lieu and transferable development rights mayshall be offered to affected land owners.

Rationale for Changes: The goal of this policy is separation of UGAs. There are different methods for achieving this goal. Land owner incentives may or may not be used by individual jurisdictions to achieve the goal. The County and cities should have the discretion to decide whether land owner incentives will be used in their particular situation.

4. The County and ~~€~~cities should work cooperatively to protect and restore stream corridors within Urban Growth Areas that support anadromous fish.

I. Economic Development and Employment

1. Whatcom County recognizes that a healthy economy, which provides opportunity for diverse segments of the community, is important to the quality of life in the area. The ~~Greater~~ Whatcom County Comprehensive Economic Development Strategy (CEDS) "is a long-term planning document that is intended to guide economic development throughout a regionis intended to put forth economic development alternatives for Whatcom County that will support jobs creation, with an emphasis on higher wage jobs and diversification."

Rationale for Changes: The current version is called the "Whatcom County" CEDS (not the "Greater Whatcom" CEDS). The inserted quote is from p. 42 of the current CEDS. The deleted quote no longer resides in the CEDS.

2. New business development and expansion of existing businesses are key factors in providing "family wage" jobs and a strong tax base. Economic development that pays family wage rates should be encouraged. Industrial land designations must be sufficient to permit the concentration of industry in appropriate locations for the 20 year planning periodbeyond 20 years. In order to attract new industry and provide for expansion of existing industries, the ~~€~~County and the cities will designate land supply of sufficient size and diversity to provide a range of suitable locations for industrial development. The designation of this land shall be established in a way that preserves natural resource based industries and critical areas.

Rationale for Changes: The Growth Management Act requires that UGAs be sized to accommodate the 20-year growth allocations (basically, no more and no less). This includes the allocations for employment lands (industrial and commercial).

3. To provide sufficient land supply for industrial growth and development, industrial designations must not only include lands suitable for development, but also lands suitably zoned to provide adequate buffers. It is also important that these lands and buffers be conserved with appropriate land use and zoning provisions to ensure that they will be available for future use.
4. Encourage workforce education and training and responsible and sustainable business ~~location, recruitment,~~ retention, and expansion according to city and ~~€~~County comprehensive plans and current Whatcom County Comprehensive Economic Development Strategy (CEDS) in order to support meet current and future demand for diverse and resilient business and industry. Work with funding agencies and the private sector to facilitate extension of adequate electric, sewer, water, telecommunications and road access to existing

commercial and industrial-zoned properties, creating shovel-ready sites. ~~Cities and county may utilize the “Quick Sites” economic development program through OTED, which links strategic elements of planning, zoning, environmental review, and permitting with the business siting effort.~~

Rationale for Changes: The City/County Planner Group subcommittee requested that the Port of Bellingham review and provide recommendations relating to the above policy. The Port provided the recommended modifications in an email dated 11/28/2022, which the City/County Planner Group accepted with minor changes.

5. The ~~e~~County and the cities should include an economic development element in their Comprehensive Plans. Economic development elements should be consistent with the CEDS. Economic development shall be coordinated with environmental concerns to protect the quality of life. Planning efforts should address economic sustainability. As part of the comprehensive planning process and through implementation of the comprehensive plan, the County ~~has~~shall develop and adopted goals, policies and regulations that protect resource lands ~~s~~—industries and support and encourage resource-based industries.
6. The ~~e~~County and the cities should continue to cooperate with the Port of Bellingham’s Economic Development Division, Regional Economic Partnership~~through the Partnership for a Sustainable Economy~~ to maintain the CEDS for infrastructure funding. Other appropriate organizations, businesses, and individuals should be involved in the process.

Rationale for Changes: The Port of Bellingham’s Economic Development Division, Regional Economic Partnership now leads updating the CEDS.

7. Economic vitality and job development shall be encouraged in all the cities and in designated areas of the ~~e~~County consistent with County and city comprehensive plan~~community—growth~~ policies, particularly addressing adequacy of transportation corridors, public transportation, impacts on the environment, and the ability of the area to provide urban services in UGAs and rural services outside UGAs.

Rationale for Changes: Changing “community growth policies” to “comprehensive plan policies” clarifies the intent of the language. The Growth Management Act defines both urban services and rural services (RCW 36.70A.030(25) and (27)). Generally, urban services are not appropriate outside UGAs (RCW 36.70A.110(4)).

8. Economic development should be encouraged that:
 - a. Does not adversely impact the environment;
 - b. Is consistent with ~~community values stated in~~ local comprehensive plans;

- c. ~~Encourages development that p~~Provides jobs to eCounty residents;
- d. Addresses unemployment problems in the eCounty and seeks innovative techniques to attract different industries for a more diversified economic base;
- e. Promotes reinvestment in the local economy;
- f. Supports retention and expansion of existing businesses.

Rationale for Changes: County and city comprehensive plans contain goals and policies that guide economic development. Makes the language more concise.

- g. Promotes transition to and development of renewable energy sources.

- 9. The County and the cities recognize the need for the protection and utilization of natural resources and resource lands including agricultural, mineral, forestry and fishing. As part of a broad based economy, productive timber, agriculture, ~~and~~ fisheries, and mineral resource industries should be supported to operate in a sustainable manner.
- 10. The cities and eCounty ~~may agree to~~ set policies for approving proposals to authorize siting of Major Industrial Developments for large or resource-based industries outside of Urban Growth Areas (as per RCW 36.70A.365). The master planning process for specific manufacturing, industrial, or commercial businesses shall address infrastructure, buffers, environmental protection, sprawl, resource lands, critical areas, and land supply.
- 11. Whatcom County and the cities encourages siting of industrial uses in proximity to and to further utilization of our access to deep water and port facilities for shipping, rail, airports, roadways, utility corridors and the international border.

J. Countywide Transportation Facilities and Strategies

- 1. The Whatcom Council of Governments (WCOG), composed primarily of elected officials appointed from all area jurisdictions, is the designated A-Regional Transportation Planning Organization (RTPO)–has been established in for Whatcom County. Under the Growth Management Act (GMA), RTPOs are directed to conduct regional, cooperative transportation planning. WCOG is also the region's federally-recognized Metropolitan Planning Organization (MPO). As a combined RTPO/MPO, WCOGThe RTPO has completed a regularly updates a 20-year Regional/Metropolitan Transportation Plan (R/MTP) including contents required by GMA (and by federal, MPO planning laws and regulations)including countywide transportation policies. The R/MTP includes regional transportation goals, projected system conditions, strategies, and investment priorities. The WCOG has adopted the R/MTP–has been approved by a regional transportation Policy Board consisting of elected representatives

~~of most area jurisdictions. The Transportation Chapter of the Whatcom County Comprehensive Plan and the Comprehensive Plans for each of the City's must be consistent with the RTP as it is amended. The GMA requires RTPOs to review and certify that updates to local comprehensive plans' transportation elements (counties and cities) and changes to county-wide planning policies 1) conform with GMA requirements and 2) are consistent with the current R/MTP. The eCounty and the cities will continue to support the RTPO on an on-going basis to coordinate transportation planning across Whatcom County.~~

Rationale for Changes: The City/County Planner Group subcommittee requested that the Whatcom Council of Governments review and provide recommendations to incorporate the WCOG's status as MPO into the above policy. The WCOG provided the recommended changes above in emails dated 11/9/2022 and 11/14/2022.

2. Whatcom County jurisdictions shall encourage multimodal transportation, including alternative modes of transportation to the single occupancy vehicle. Each jurisdiction shall encourage:
 - a. Use of public transportation;
 - b. Development of ~~like~~-on-street bicycle routes and pedestrian and bicycle trail corridors;
 - c. Adequate pedestrian facilities;
 - d. Connections between different modes of transportation;
 - e. Intermodal connection of freight transportation.
3. To encourage multimodal transportation, ~~use of~~ single occupant vehicle alternatives and development of pedestrian scale neighborhoods, high density residential development shall be encouraged in urban growth areas with particular attention to those locations within cities and in close proximity to arterials and main transit routes.
4. Cities are particularly encouraged to support transit and pedestrian friendly mixed use developments within their UGAs to help achieve the goals supported in these policies.
5. Where the ~~roadway~~-level of service (LOS) for a locally owned transportation facility adopted in a County or city~~local~~ comprehensive plans cannot be maintained as a result of proposed new development, that development shall be denied, unless transportation improvements or strategies to accommodate the impacts of development are made concurrent with the development~~the proponents agree to pay a proportionate share of the cost of maintaining the LOS.~~

Rationale for Changes: The Growth Management Act requires concurrency for locally owned transportation facilities, but not for state facilities. Additionally, the Growth Management Act language relating

to transportation improvements or strategies has been substituted for the language currently in the Countywide Planning Policies (see RCW 36.70A(6)(b)).

6. Strategies for maintaining established levels of service may include transportation demand management techniques, ~~project~~-impact ~~or~~ mitigation fees, enhanced access to public transportation service, and/or other steps to reduce or limit traffic congestion.
7. Priorities shall be established and expenditures coordinated for countywide bicycle and trail corridors. Bicycle and pedestrian-specific trails and other facilities shall be included during project planning and review. Coordinated corridors and cost sharing should be explored among all responsible and interested parties.
8. Whatcom County ~~and the cities~~ should work cooperatively with the Whatcom ~~County~~—Council of Governments, ~~Cities~~,—Whatcom ~~Transportation~~ Transit Authority, ~~WSDOT~~ and other agencies with jurisdiction to plan for inter-county and international transportation links, such as airports, border crossings, passenger rail, freight rail, transit, ferries, and other transportation facilities.

Rationale for Changes: The County is not the lead entity planning for some of the transportation facilities shown above. Additionally, the Countywide Planning Policies apply to the County and the cities. Both the County and cities have an interest in these facilities and should work together with appropriate entities to address them.

9. Encourage “complete streets” principles. Complete streets are designed and operated to enable safe use and support mobility for all users, including people of all ages and abilities, regardless of whether they are travelling as drivers/passengers, pedestrians, bicyclists, or public transportation riders.

Rationale for Changes: The Whatcom Council of Government suggested the above language, based upon the U.S. Department of Transportation Complete Streets concepts (see U.S. Department of Transportation [website](#)).

K. Siting of Public Facilities

1. As part of the comprehensive planning process, the ~~e~~County and the cities shall identify appropriate land for public facilities which meets the needs of the community, such as schools, recreation, transportation and utility corridors, human service facilities, and airport and other port facilities. ~~In order to reduce land-use conflicts, policies related to a design component shall be incorporated in the comprehensive plans.~~

Rationale for Changes: Whatcom County no longer has a “Design” chapter in the Comprehensive Plan. Additionally, some cities do not have design chapters in their comprehensive plans. A design chapter is not

a required comprehensive plan element under the Growth Management Act.

2. The eCounty and the cities will implement a cooperative and structured process, which includes early and continuous public involvement, to consider siting of essential public facilities of a regional and statewide nature. State facilities shall conform to local siting procedures.
3. Public facilities that generate substantial travel demand should be sited along or near major transportation and public transit corridors, where available.
4. The eCounty and the cities shall work with their respective school district to encourage siting of schools in ~~conjunction with~~ areas where substantial development exists or is projected and near public transportation corridors.
5. Sharing of corridors for major utilities, trails and other transportation rights-of-way is encouraged when not in conflict with goals to protect wildlife, public health and safety.

L. Impact Fees

1. The eCounty and the cities are encouraged to adopt fair and reasonable impact and/or mitigation fee ordinances to ensure that new growth pays its fair share of the cost of capital facilities, such as transportation improvements, parks, ~~and schools, and fire protection facilities.~~
2. When requested by a school district or fire district, the eCounty and cities should~~shall~~ work with ~~the their school~~ districts to develop impact fees formulas as appropriate to the district's capital needs.

Rationale for Changes: Some school districts in Whatcom County collect impact fees and others do not. School districts that have impact fees typically develop their own fees, often with the assistance of a consultant the district hires. The County and cities may provide planning information, such as growth projections, but would not develop the actual formulas. Fire districts have been added to the above policy, as impact fees can be collected for fire protection facilities under RCW 82.02.050 – 100.

M. Intergovernmental Cooperation

1. The County and the cities will coordinate and cooperate throughout the comprehensive plan, development regulations and urban growth area reviews and updates undertaken pursuant to the Growth Management Act, RCW 36.70A. This coordination and cooperation will address topics including but not limited to amount and location of population, housing, and employment growth, capital facilities, transportation, climate change and community resilience. As a component of this coordination and cooperation, the County Executive may convene a Growth Management Planning Committee comprised

of elected officials from the County and the cities, representatives of the Lummi Nation and Nooksack Tribe and, where deemed appropriate, representatives from other agencies and Tribes.

Rationale for Changes: The County Executive proposed language relating to a Growth Management Planning Committee in an email of October 24, 2024. The City/County Planner Group recommended language, as shown above, to focus on coordination related to issues local governments must address under the GMA.

- 1.2. To adequately plan for growth and implement the policies of the Growth Management Act, the County and Cities will work with other governmental jurisdictions in Whatcom County, including the Lummi Nation, ~~and~~ Nooksack Tribe, and the Port of Bellingham, ~~shall work together~~ to establish on-going mechanisms to improve communication, information sharing and coordinated approaches to common issues and concerns~~problems~~.

Rationale for Changes: The Countywide Planning Policies do not govern the actions of the Lummi Nation, Nooksack Tribe, or Port of Bellingham. However, the Countywide Planning Policies can direct the County and cities to work with these governmental jurisdictions.

- 2.3. Whatcom County and the cities~~governments~~ should communicate with neighboring counties and governments in British Columbia and work cooperatively on growth management issues that cross county and national borders.

N. Water Quality and Quantity

1. The cities~~7~~ and the ~~e~~County, in coordination~~cooperation~~ with other municipal corporations, tribal governments, federal and state agencies, and public and private utilities, ~~shall~~ cooperate in the protection of water resources and in drawing upon said water to support growth.
2. The Cities and the County in cooperation with other municipal corporations and tribal governments shall adopt zoning regulations and development standards to protect water resources. Where there are potential conflicts with designations required by the Growth Management Act, such as natural resource lands and critical areas, water resource protection shall generally have priority.
3. Jurisdictions shall cooperate to protect and restore water resources and fish habitat within UGA's and across jurisdictional boundaries to maintain quality of life, ~~and~~ economic health, and protect treaty natural resources in Whatcom County.

4. Jurisdictions involved in the development of ground and/or surface water management plans shall pursue the adoption and implementation of the plans, as well as coordination and integration of the plans into local comprehensive plans as appropriate. Examples of such plans include the Lake Whatcom Management Plan, WRIA 1 Watershed Management Plan, Shellfish Protection District Plans and drinking water source protection plans.
5. ~~All jurisdictions should~~ To inform Growth Management Act planning efforts, water resources management should be coordinated through participation ~~participate~~ in the Water Resources Inventory Area (WRIA) 1 Watershed Management Board process ~~to establish a countywide water resource management body and~~ in accordance with ~~the Watershed Management Act and other~~ applicable federal, state and local regulations ~~to inform GMA planning efforts.~~

Rationale for Changes: The City/County Planner Group subcommittee requested that the Whatcom County Public Works Department review and provide recommendations on the above policy. The County Public Works recommended the changes above in an email dated 11/21/2022.

6. All jurisdictions shall maximize reduction of water pollutants from stormwater runoff and combined sewer overflows.

O. Fiscal Impact

1. It is recognized that if the Growth Management Act and these policies are implemented to their maximum extent, ~~e~~County government may eventually lose the tax base needed to operate essential services, including the criminal justice function and the Offices of Treasurer, Assessor, and Auditor, which serve all jurisdictions in the area. Revenue-sharing shall be addressed in inter-local agreements between Cities and the County.

P. Private Property Rights

1. As required in the Growth Management Act, private property shall not be taken for public use without just compensation having been made. It is not the purpose of this paragraph to expand or reduce the scope of private property already provided in local, state and federal law.
2. The ~~e~~County as required by Whatcom County Home Rule Charter Section 1.11, and cities should establish a pro-active process to anticipate potential takings.

Q. Review and Evaluation Program

1. The County and cities will cooperate to implement and maintain a program that meets the review and evaluation requirements of RCW 36.70A.215, unless

the Growth Management Act no longer contains these requirements or sufficient funds are not appropriated by the state.

2. The purposes of this program are to:
 - a. Compare actual (achieved) development densities with planned development densities and determine whether the County and cities are achieving planned urban densities within urban growth areas and have sufficient suitable land to accommodate ~~housing needs~~planned population and planned employment growth through the remainder of the 20-year planning period.
 - b. Identify and adopt reasonable measures, if necessary, to reduce the differences between actual development patterns and growth and development assumptions contained in the County comprehensive plan and/or city comprehensive plans.
3. The County, in conjunction with the cities, will develop and maintain a Review and Evaluation Program Methodology, taking into consideration the State Department of Commerce Review & Evaluation Program Buildable Lands Guidelines.
4. The County, in conjunction with the cities, will prepare, adopt, and publish a Buildable Lands Report in accordance with the timeframes set forth in the Growth Management Act.
5. The County and cities will follow the Review and Evaluation Program Methodology for the collection, monitoring, and analysis of development activity data, and comparing actual growth and development patterns with growth and development assumptions. As part of this process, the cities and County will collect data annually. The cities will provide collected data to the County upon request.
6. When the Buildable Lands Report identifies inconsistencies between actual development patterns and growth and development assumptions and targets contained in the County comprehensive plan and/or city comprehensive plans, the County and cities will discuss whether reasonable measures are necessary and appropriate to address such inconsistencies before considering adjusting urban growth areas. Each jurisdiction will individually determine whether reasonable measures are required under the Growth Management Act for their jurisdiction.
7. The County and cities will cooperate, and make every effort at the staff level, to resolve disputes regarding inconsistencies in collection and analysis of data.
8. Nothing in this policy will be construed as altering the land use power of any Whatcom County jurisdiction under established law.

R. Dispute Resolution Procedures

1. The County and cities will work cooperatively to implement the countywide planning policies. The County and cities will work together to attempt to resolve any disputes regarding implementation of the countywide planning policies.
2. In the event of an impasse, the jurisdictions involved may mutually agree to use mediation for a minimum of 90 days. After the 90 day period, the parties may, by mutual agreement, elect to utilize binding arbitration. In the event that the parties agree to use arbitration, a three member arbitration panel will be selected by mutual agreement. If the parties cannot agree on membership of the panel, each party will select one member and those two members will select the third member. The decision of the arbitration panel on the issue will be final.
3. If mediation, arbitration, or both are used, each jurisdiction will be responsible for its own legal costs, but the jurisdictions involved will split the costs of a mediator or arbitrators evenly.
4. Nothing in this policy will be construed as altering the land use power of any Whatcom County jurisdiction under established law.

S. Tribal Cultural Resources

1. The County and cities shall work individually and cooperatively with the affected tribe(s) to protect natural and cultural resources through individual and joint efforts. Opportunities for open communication and early government-to-government consultation regarding resource identification, management and protection protocols should be established.
2. Federal, state and local laws pertaining to cultural resources and human remains should be followed.
3. The County and cities should establish a clear and fair process for resolving any disagreements regarding the identification, protection, or management of tribal cultural resources. This process should involve mediation and conflict resolution techniques that respect and affirm tribal sovereignty, treaty rights and traditional practices.
4. The County and cities will work with the Washington State Department of Archaeology and Historic Preservation (DAHP) and affected tribes to identify, protect and manage historic, archaeological, and cultural sites as well as sites and structures of significance in compliance with federal, state, and local laws. Tribal cultural resources include sites, features, places, cultural landscapes, sacred places and objects with cultural value.

Rationale for Changes: The City/County Planner Group recommends that a tribal cultural resources section be inserted in the Countywide Planning Policies to collaborate with federally recognized Indian Tribes on cultural resource protection. House Bill 1717 recently amended

countywide planning policies requirements to address the protection of tribal cultural resources (RCW 36.70A.210(3)(i)). The County invited the Lummi Nation and Nooksack Tribe to participate in and cooperate with the countywide planning policy adoption process. The Lummi Nation sent an email on January 9, 2025 with proposed changes to the Tribal Cultural Resources Countywide Planning Policies. The City/County Planner Group endorsed the Lummi Nation's proposed changes in January 2025 with minor modifications. The Nooksack Tribal Council sent an email with proposed changes on April 10, 2025.

T. Climate Change/Community Resilience**1. The County and the cities will work individually and cooperatively to limit and address impacts from climate change and increase community resilience.**

Rationale for Changes: Policy summarizes new climate planning requirements in RCW 36.70A.020.

2. As determined to be appropriate by each jurisdiction consistent with the Growth Management Act, County and city comprehensive plans will include policies to adapt to and mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resilience to climate impacts and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice.

Rationale for Changes: Policy language is based upon RCW 36.70A.020(14), the Growth Management Act's planning goals (as amended by HB 1181 in 2023).

3. The County and cities will incorporate comprehensive plan policies to support the net zero greenhouse gas emissions target by 2050 consistent with the Washington statewide target set by the State Legislature (RCW 70A.45.020).

Rationale for Changes: RCW 36.70A.070(9) requires certain local governments to adopt a greenhouse gas subelement that identifies actions to reduce communitywide greenhouse gas emissions. The State Department of Commerce's *Climate Element Planning Guidance - Intermediate Version* (December 2023) indicates ". . . 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 . . . (p.43)."

4. The County and cities will incorporate comprehensive plan policies to address natural hazards created or aggravated by climate change, protect natural

areas to foster climate resilience, and enhance community resilience to climate impacts.

Rationale for Changes: Policy reflects requirements under RCW 36.70A.070(9) to create a resiliency subelement that identifies actions to enhance resiliency and reduce adverse impacts of climate change. The *Climate Element Planning Guidance – Intermediate Version* (December 2023) includes the three minimum requirements as listed above (p.16).

5. The County and cities will incorporate comprehensive plan policies to identify vulnerable populations and overburdened communities and address their exposure to climate impacts.

Rationale for Changes: Policy reflects requirements under 36.70A.070(9) to create policies that address impacts to “overburdened communities” and “vulnerable populations” as defined by [RCW 36.70A.030](#).