Whatcom Environmental Council

Email:
whatcomec@gmail.com

Website:
www.whatcomenvirocouncil.orgl

November 3, 2025

To: Bellingham Mayor and City Council

Subject: HB 1181, Response to GMA Climate Requirements in the Bellingham Plan

Summary:
The Bellingham Plan ("Plan") does not demonstrate that it will result in reducing overall greenhouse gas (GHG) emissions generated by transportation and land use, nor that it would result in reducing per capita vehicle miles traveled, as required by the Growth Management Act (GMA). The Plan does not include an evaluation of tree canopy coverage in city parks and does not include an inventory of green infrastructure.

GMA and HB 1181 requirements for GHG emissions reduction
The GMA requires the city to adopt a greenhouse gas emissions reduction sub-element and development regulations that identify actions the city will take during the 20-year planning cycle.[1] The actions must be consistent with guidelines published by the Department of Commerce.[2]

The three ***minimum requirements***[3] for the GHG emissions reduction sub-element require the City to show that its actions will:

A. ***Result in reductions*** in overall greenhouse gas emissions generated by transportation and land use but without increasing greenhouse gas emissions elsewhere in the state; and
B. ***Result in reductions*** in per capita vehicle miles traveled [VMT] within the jurisdiction but without increasing greenhouse gas emissions elsewhere in the state; and
C. ***Prioritize reductions*** that benefit overburdened communities in order to maximize the co-benefits of reduced air pollution and environmental justice.

[1] RCW 36.70A.070(9)
[2] The Department of Commerce published Intermediate Climate Element Planning Guidance in December 2023. A draft version of revised guidance is available for public comment with the guidance anticipated to be published in December 2025.
[3] RCW 36.70A.070(9)(d)(i). A comment letter from Robert A. Carmichael and Bridget Bryck (October 29, 2025) quotes only portions of our letter regarding GMA requirements. The letter fails to quote GMA goals or GMA climate element requirements that say "result in reductions". The GMA requirements, quoted in the text accompanying this footnote, are **minimum** GMA requirements. See Attachment 1 for statutory language.

This letter focuses on the first two minimum GHG requirements. See our letter dated October 29, 2025 for comments related to climate resilience requirements and overburdened communities.

The GMA requires a reduction in per capita vehicle miles traveled

The Growth Management Act is clear: the City's plan and development regulations must reduce per capita vehicle miles traveled. The GMA requirement measures the reduction of vehicle miles traveled "per capita", which acknowledges the assumption of population growth and allocation to urban areas. Even taking population growth in account, the Comprehensive Plan will result in an **increase** in vehicle miles traveled, in clear violation of the GMA.[4]

Our analysis is based on publicly available data[5] for Bellingham, including the Draft Multimodal Transportation Plan and the Whatcom County Final Environmental Impact Statement (FEIS).[6] The data (with sources listed) show a clear **increase** in vehicle miles traveled:

	Data	Data source
2023 VMT[7]	1,693,782	FEIS
2023 Pop[8]	105,529	FEIS
2023 per capita VMT	16.05	calculated
2045 VMT[9]	2,302,246	FEIS
2045 Pop[10]	135,829	Bellingham
2045 per capita VMT	16.95	calculated

The largest source of GHG emissions in the transportation sector is from on-road vehicles, most of which are passenger vehicles.[11] If local actions are implemented to reduce per-capita passenger vehicle miles

[4] See Attachment 1 for GMA requirements to reduce per capita vehicle miles traveled. Whatcom County and the city of Bellingham have received comments that GMA cannot "restrict population growth or limit population allocation in order to achieve the requirements in the climate element." Whatcom County and the city of Bellingham can achieve a reduction in per capita vehicle miles traveled without restricting population growth or limiting population allocation.

[5] HB 1181 and RCW 47.80.100 required the Washington State Department of Transportation (WSDOT) to "publish a summary of the per capita vehicle miles traveled annually in each city in the state…", which has yet to be published. (See email from WSDOT, 10-22-25.)

[6] Whatcom County Final Environmental Impact Statement (FEIS), Table 3.2-4, pg 3-22. The Multimodal Transportation Plan provides "total daily vehicle miles traveled" in four future scenarios but does not provide 2023 data. The Whatcom County FEIS provides 2023 and 2045 data for the Bellingham UGA, and although it does not indicate whether the data is daily, it is presumed to be daily figures since the data closely aligns with the Multimodal Transportation Plan.

[7] Whatcom County Final Environmental Impact Statement (FEIS), Table 3.2-4, pg 3-22. "Jurisdictions should use 2022 as their emissions baseline year…jurisdictions use 2022 as a baseline year because it reflects the new normal in terms of activity within the transportation sector…"" Wash. State Dept. of Commerce, Growth Mgmt. Services, Climate Planning Guidance – December 2023, pg. 43.

[8] Whatcom County Final Environmental Impact Statement (FEIS), Table 3.7-3, pg 3-132.

[9] Whatcom County Final Environmental Impact Statement (FEIS), Table 3.2-4, pg 3-22. Also, see Draft Multimodal Transportation Plan, which shows 2045 Alternative A2 having Total Daily VMT in 2045 as 2,289,664.49, a difference of only 12,582 total Daily VMT (<1%) from the FEIS data.

[10] The Bellingham Plan, LU-1, pg. 20

[11] Wash. State Dept. of Commerce, Growth Mgmt. Services, *Whatcom County Greenhouse Gas Emissions Trends*, June 2025 (p. 15). "This GHG analysis effort aims to support local comprehensive planning, as identifying current

traveled, the state Department of Commerce's analysis of GHG emissions shows that emissions could be reduced by 10%.[12]

The City could achieve the required reduction in vehicle miles traveled by revising the Transportation element and/or Land Use element. We would encourage the City to revisit proposed urban growth areas, including new expansions and existing urban growth areas that have been in place for the past 30 years. The City should consider increasing proposed densities along frequent transit corridors and bicycle routes, and within urban villages. The City should consider infill of residential units within current low-density mixed use corridors. The data demonstrates that the proposed policies are not sufficient to ensure a transportation mode shift from cars and light trucks to transit or non-motorized transportation which would result in a reduction of per-capita vehicle miles traveled.[13]

It has been suggested that the electrification of vehicles[14] will reduce GHG emissions, so reducing vehicle miles traveled is not a good measurement. Unfortunately, as the Washington State Department of Transportation has observed, "[f]leet conversion to an all-electric fleet cannot happen quickly enough to reduce greenhouse gas emissions to meet climate targets and must be coupled with other interventions to support the health and safety of all Washington residents."[15] Further, "[r]educing vehicle miles traveled on a per capita basis is necessary to make progress on the many community and state goals related to climate, health, safety, and livability."[16]

- The Bellingham Plan does not set a policy that requires electric charging infrastructure to be installed in new or retrofitted buildings.
- Electric charging infrastructure is needed to accelerate the transition to electric vehicles and reduction of GHG emissions.
- The Capital Facilities Element and Multimodal Transportation Plan do not appear to have any funds set aside for installation of electric charging stations for the municipal fleet or the public.
- There is a direct relationship between increases in VMT and fatalities[17]
- Neighborhoods that require residents to drive for daily activities have been linked with social isolation, anxiety, and increased blood pressure.[18]
- Economic productivity tends to increase as vehicle travel declines.[19]

---

and future emissions is a critical step in understanding where the state's largest sources of emissions are occurring and where there are opportunities for emissions reduction. This report provides a summary of 2022 communitywide and county government operations emissions for Whatcom County, as well as projected future emissions and GHG emission reduction strategies." *Id*. at p. 4.

[12] Greenhouse Gas Emissions Trends, Whatcom County, June 2025, Table 9, pg. 19.

[13] For other strategies that work, see "Vehicle Miles Traveled (VMT) Targets – Final Report", June 2023, Washington State Department of Transportation

[14] See our comments later about mode shift and EV charging.

[15] "Vehicle Miles Traveled (VMT) Targets – Final Report", June 2023, Washington State Department of Transportation.

[16] "The Case for Reducing VMT", WSDOT

[17] "The Case for Reducing VMT", WSDOT

[18] "The Case for Reducing VMT", WSDOT citing Currey, Ganson, Miller, & Fesler. (2015). Vehicle-Miles Traveled (VMT) Impacts on the Environment, Human. *DOT Sustainability Directors Meeting.* Sacramento: State Smart Transportation Initiative. Retrieved from https://ssti.us/wp-content/uploads/sites/1303/2015/06/Ganson-VMT-Impacts-on-the-Environment-Human-Health-and-Fiscal-Health-Working-Paper-1.pdf

[19] "Are Vehicle Travel Reduction Targets Justified", Victoria Transport Policy Institute, Todd Litman, 1 August 2025 citing FHWA Highway Statistics Series 2019

- Converting parking spaces into other uses leads to improvement in economic outcome for local business.[20]
- Increasing vehicle miles traveled increases demand to fund the expansion of roads and parking facilities, with less funds available for resource-efficient modes (walking, bicycling, and public transit).[21]

GMA requires a reduction in Greenhouse Gas Emissions

The Growth Management Act is clear: greenhouse gas emissions must be reduced. The state's climate element planning guidance[22] allows the City to develop its own goals and policies or select from Commerce's Menu of Measures to address this minimum requirement.

> *"Policies that are not specifically identified in the Menu of Measures will be considered consistent with this guidance if they are measureable and supported by scientifically credible projections and scenarios that indicate their adoption is likely to result in reductions of GHG emissions or per capita VMT."*[23]

The Bellingham Plan provided no baseline data for GHG emissions, which undermines the plain intent of the state's climate element planning guidance.[24] But available GHG emissions data for Whatcom County that could provide a baseline includes the Final EIS,[25] the "Whatcom County 2022 Greenhouse Gas Emissions Analysis",[26] and the 2025 "Greenhouse Gas Emissions Trends and "Greenhouse Gas Emissions Projections".[27]

What we do know about Bellingham's GHG emissions is included in the 2018 Climate Action Plan.[28] The City's sewer utility emitted 40% of municipal emissions – the most of any sector (pg. 33). The Post Point Resource Recovery emission reduction measure would have resulted in a reduction of -1558 CO_2e tons (pg. 42).[29] It projected that upgrading the Post Point wastewater treatment plant biosolids process

[20] "The Case for Reducing VMT", WSDOT citing Pratt, L. (2011, August). National Association of City Transportation officials.

[21] See "Are Vehicle Travel Reduction Targets Justified", Victoria Transport Policy Institute, Todd Litman, 1 August 2025 Also, see "SEPA Checklist – Appendix A, Environmental Record Report for the Bellingham Plan" which shows the impacts on arterial street segments generated by traffic based on the Plan.

[22] Intermediate Climate Element Planning Guidance, December 2023.

[23] Intermediate Climate Element Planning Guidance, December 2023, pgs. 42 and 62.

[24] "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." Intermediate Climate Element Planning Guidance, December 2023, pg. 43.

[25] https://www.whatcomcounty.us/DocumentCenter/View/102598/Whatcom-County-2025-Comprehensive-Plan-Final-EIS?bidId=

[26] https://deptofcommerce.app.box.com/s/4toz87qbclwe0fx2rcnuousi63gifpfe

[27] https://www.whatcomcounty.us/DocumentCenter/View/101846/5-Whatcom-County-Greenhouse-Gas-Trends-and-Projections-Reports?bidId=

[28] The 2018 Climate Action Plan is not adopted by reference into the Bellingham Plan.

[29] "City to embark on Post Point incinerator upgrade project", Cascadia Daly News, March 25, 2025

would eliminate the need for incineration and capture methane to use for energy, greatly reducing greenhouse gas emissions (pg. 17 and 57).

The GHG emission reductions for wastewater and Post Point that were included in the 2018 update to the Climate Action Plan would have the greatest impact on reducing GHG emissions as required by GMA. These projects were dropped from the City's plans due to contaminants in the sewage sludge that would have been produced and applied on land. These issues are not even mentioned in the Bellingham Plan as a goal or policy to achieve during the 20-year planning period. Given this shift, something needs to be said in the Plan.

The Climate Action Plan also projected that promoting hybrid and electric cars and vehicle mode shift would result in reduction of -20,844 and -13,073 CO_2e tons respectively (pg. 45). It was found that vehicle mode shifts would reduce trips 17% by 2022 and 27% by 2036 (pgs. 89-91). It also proposed an Increase in the number of students walking and bicycling to school, with the goals of reducing vehicle trips and congestion and improving air quality (pg. 91).[30] The proposed Bellingham Plan does not ensure that any of these goals and assumptions will be met.

Finally, the Climate Action Plan includes a City commitment to setting targets to cut actual municipal emissions (p. 38). The Bellingham Plan sets no targets.

The GMA requires a progress report that details progress towards implementing GHG emissions and per capita VMT reduction policies to achieve local goals and targets.[31] The Bellingham Plan does not provide baseline data, nor GHG reduction goals or targets. Without baseline data or reduction goals or targets, any progress report is not measurable.

The Bellingham Plan includes policies that are not specifically identified in the Department of Commerce's Menus of Measures. The state's climate element planning guidance provided a workbook for capturing the analysis a local jurisdiction took to demonstrate how the measures it proposes results in reduction of GHG emissions. None of this work appears to have been provided to the public or decision-makers.

In Attachment 2, we provide the highest priority measures Commerce identified for reduction of greenhouse gas emissions. Some of the measures we will highlight that are not included in the Bellingham Plan, or should be amended, include:

- Require additional net-zero greenhouse gas emission features of all new residential and commercial structures

[30] Many of Bellingham's schools are not walkable for students (e.g. Wade King Elementary and Alderwood Elementary). WSDOT's VMT Reduction Report recommends that schools should be sited where "proximity to students' homes and potential for safe walking, bicycling, and transit routes one of the primary factors in school site selection for both construction of new schools and districting decisions. In addition amend WAC…to relax school building requirements to be less land intensive, so they can be better suited to infill development." Note: the proposed UGA expansion into North Bellingham is within the Meridian School District, where there will be no safe walking or bicycling to schools.

[31] RCW 36.70A.130

- Limit parking spaces near transit-oriented development to encourage use of transit and decrease single-occupancy vehicle travel
- Maximize tree canopy coverage in surface parking lots
- Increase residential densities near (withing 600 feet) high-use transit stations and centers[32]
- Incentivize parking minimum requirements and establish parking maximums[33]
- Prioritize, develop, and maintain mobility hubs in transportation-efficient locations — especially in overburdened communities experiencing a scarcity of transportation alternatives
- Prioritize the preservation and weatherization of housing in overburdened communities, particularly at higher densities, to reduce emissions and increase resilience
- Adjust single-family home impact fees and system development charges so those homes with larger impacts on utilities pay more
- Prioritize permitting for transit-oriented development (TOD) proposals

The following table provides examples of revisions to the Bellingham Plan that would strengthen some of the proposed policies. One very significant omission is the establishment of baseline emissions and quantifiable emission reduction goals, in order to demonstrate progress in the 20-year planning period. In addition, there are many policies in the state climate planning guidelines that are missing and should be added to the Bellingham Plan.

Proposed Bellingham Plan Goal or Policy	**Strengthened Policy**
LU-16. Allow annexations of land in Bellingham's unincorporated UGA only when the analysis required in the annexation plan is complete and includes a financially sustainable approach to provide urban facilities and services such as police, fire, water and sewer.	LU-16. Allow annexations of land in Bellingham's unincorporated UGA when an analysis demonstrates: 1) a financially sustainable approach to provide urban facilities and services such as police, fire, water and sewer; 2) a demonstration that the annexation will not result in an increase city-wide of greenhouse gas emissions, including per capita vehicle miles traveled; 3) a development agreement or annexation agreement that a) includes participation in the Whatcom County density credit program,[34] b) includes housing affordable to a range of incomes; and c) includes demonstration that level of service for urban facilities and services will be met.
C-3. Model the City's leadership and commitment to addressing climate change across all municipal facilities, operations and civic practices.	C-3. The City will update the Climate Action Plan by December 31, 2026, addressing climate change across all municipal facilities, operations and civic practices, including setting baseline and

[32] The Bellingham Plan does not establish any minimum densities. Instead, it uses terms such as "to meet minimum density standards" without ever defining the standards. .

[33] The Bellingham Plan uses the word "modernize" to refer to vehicle parking requirements to achieve climate objectives. To make something modern might mean different things to different people. More direct language should be included, as provided in the climate planning guidance.

[34] See Interlocal Agreement between the City of Bellingham and Whatcom County Concerning Planning, Annexation and Development within the Bellingham UGA, July 1, 2022, Section 11.A

	targets for reduction in greenhouse gas emissions and responding to climate resiliency requirements of GMA.
C-37. Support the expansion of electric vehicle infrastructure, including the well-distributed placement of charging stations on public and private property.	C-37. Amend development regulations to require electric vehicle charging infrastructure, including the well-distributed placement of charging stations on public and private property.
C-38. Modernize vehicle and bicycle parking requirements to achieve climate objectives while improving air quality and bicyclist and pedestrian safety.	C-38. Adopt vehicle and bicycle parking requirements that result in mode shift from vehicles to transit, bikes or walking to achieve climate objectives while improving air quality and bicyclist and pedestrian safety. Parking requirements must include limits on maximum parking, with consideration to location near frequent transit stops, and require tree canopy coverage.
FS-44. Retain neighborhood schools in developed areas and work with the school districts to locate new schools consistent with the City's commitment to encourage infill development, walkability and compact growth.	FS-44. Retain neighborhood schools in developed areas. Work with the school districts to ensure new schools are located in proximity to students' homes and where safe walking, bicycling and transit routes are available.
Mode Shift Targets[35]	1) Update mode shift targets on page 22 of the Multimodal Transportation Plan as needed to demonstrate a reduction in per capita vehicle miles traveled. 2) Include mode shift graphic in the Bellingham Plan

The following policies are not included in the Bellingham Plan and should be added:

1) Minimum densities – Minimum density requirements for each of the land use categories should be included in the Bellingham Plan.
2) Post Point – The Bellingham Plan should set goals and a timeline to phase out the GHG emissions from incineration of solid waste sludge at the Post Point Water Treatment Plant, including milestones for assessing alternatives.
3) Adjust Impact Fees for Larger Impacts – Adjust single-family home impact fees and system development charges so those homes with larger impacts on utilities pay more.
4) Permitting - Prioritize permitting for transit-oriented development (TOD) proposals.

[35] Draft Multimodal Transportation Plan, pg 22

Other HB 1181 requirements

We mentioned these issues in our September 18, 2025 letter but will repeat them again as they relate to HB 1181 requirements.

The GMA requires an evaluation of tree canopy coverage within the urban growth area. Neither the current PROS Plan nor this Plan provides the required "evaluation of tree canopy coverage" required by GMA. Evaluation means a "determination of value, nature, character, or quality of something or someone".[36] On page 109 of the Bellingham Plan, there is a map that shows the 2022 LIDAR image of tree canopy. This map is not accompanied by any evaluation of the tree canopy.

The 2023 amendments to GMA regarding climate change and planning[37] requires an inventory of "green infrastructure".[38] The Draft Capital Facilities Plan fails to include a green infrastructure inventory.

In conclusion, we understand that Washington State provided $700,000 to Bellingham to address HB 1181 climate requirements. Unfortunately, we do not see any analysis, baseline data or goals that can be used to measure whether the Plan would result in reduction in GHG emissions or per capita vehicle miles traveled, as required by GMA. Commerce advised that "goals should include benchmarks for emissions reductions, which will be important for evaluating progress."[39] We agree that this guidance is critical and the Bellingham Plan, unfortunately, falls short.

We hope that this letter provides some guidance that will help the City to meet state climate requirements through its Comprehensive Plan and development regulations. Thank you for your consideration of our comments. We urge the Bellingham City Council to address the significant issues we (and others) have raised before taking action on the Plan.

Sincerely,

David Stalheim, submitted individually and on behalf of
Whatcom Environmental Council

Attachments:

Attachment 1, GMA requirements for per capita vehicle miles traveled
Attachment 2, Menu of Measures, Highest Priority Measures for GHG Reduction

[36] Merriam-Webster definition found at https://www.merriam-webster.com/dictionary/evaluation
[37] ESSHB 1181
[38] "Green infrastructure" means a wide array of natural assets and built structures within an urban growth area boundary, including parks and other areas with protected tree canopy, and management practices at multiple scales that manage wet weather and that maintain and restore natural hydrology by storing, infiltrating, evapotranspiring, and harvesting and using stormwater." RCW 36.70A.030(23)
[39] Intermediate Climate Element Planning Guidance, December 2023, pg 58.

Attachment 1
GMA requirements for per capita vehicle miles traveled

The following legislation addresses the requirements regarding per capita vehicle miles traveled, with ***emphasis added***.

GMA Goals: (http://app.leg.wa.gov/RCW/default.aspx?cite=36.70A.020)
(3) Transportation. Encourage efficient multimodal transportation systems that will reduce greenhouse gas emissions and **per capita vehicle miles traveled**, and are based on regional priorities and coordinated with county and city comprehensive plans.
(14) Climate change and resiliency. Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies under RCW **36.70A.210** and chapter **47.80** RCW 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 resiliency to climate impacts and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice.

GMA Definitions: (http://app.leg.wa.gov/RCW/default.aspx?cite=36.70A.030)
(32) "**Per capita vehicle miles traveled**" means the number of miles traveled using cars and light trucks in a calendar year divided by the number of residents in Washington. The calculation of this value excludes vehicle miles driven conveying freight.

GMA Comprehensive Plans—Mandatory Elements:
(http://app.leg.wa.gov/RCW/default.aspx?cite=36.70A.070)
(1) A land use element designating the proposed general distribution and general location and extent of the uses of land, where appropriate, for agriculture, timber production, housing, commerce, industry, recreation, open spaces and green spaces, urban and community forests within the urban growth area, general aviation airports, public utilities, public facilities, and other land uses. The land use element shall include population densities, building intensities, and estimates of future population growth. The land use element shall provide for protection of the quality and quantity of groundwater used for public water supplies. The land use element must give special consideration to achieving environmental justice in its goals and policies, including efforts to avoid creating or worsening environmental health disparities. Wherever possible, the land use element should consider utilizing urban planning approaches that promote physical activity and reduce **per capita vehicle miles traveled** within the jurisdiction, but without increasing greenhouse gas emissions elsewhere in the state. Where applicable, the land use element shall review drainage, flooding, and stormwater runoff in the area and nearby jurisdictions and provide guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state, including Puget Sound or waters entering Puget Sound. The land use element must reduce and mitigate the risk to lives and property posed by wildfires by using land use planning tools, which may include, but are not limited to, adoption of portions or all of the wildland urban interface code developed by the international code council or developing building and maintenance standards consistent with the firewise USA program or similar program designed to reduce wildfire risk, reducing wildfire risks to residential development in high risk areas and the wildland urban interface area, separating human development from wildfire prone landscapes, and protecting existing

residential development and infrastructure through community wildfire preparedness and fire adaptation measures.
(9)(a) A climate change and resiliency element that is designed to result in reductions in overall greenhouse gas emissions and that must enhance resiliency to and avoid the adverse impacts of climate change, which must include efforts to reduce localized greenhouse gas emissions and avoid creating or worsening localized climate impacts to vulnerable populations and overburdened communities.

(b) The climate change and resiliency element shall include the following subelements:

(i) A greenhouse gas emissions reduction subelement;

(ii) A resiliency subelement.

(c) The greenhouse gas emissions reduction subelement of the climate change and resiliency element is mandatory for the jurisdictions specified in RCW **36.70A.095** and is encouraged for all other jurisdictions, including those planning under RCW **36.70A.040** and those planning under chapter **36.70** RCW. The resiliency subelement of the climate change and resiliency element is mandatory for all jurisdictions planning under RCW **36.70A.040** and is encouraged for those jurisdictions planning under chapter **36.70** RCW.

(d)(i) The greenhouse gas emissions reduction subelement of the comprehensive plan, and its related development regulations, must identify the actions the jurisdiction will take during the planning cycle consistent with the guidelines published by the department pursuant to RCW **70A.45.120** that will:

(A) Result in reductions in overall greenhouse gas emissions generated by transportation and land use within the jurisdiction but without increasing greenhouse gas emissions elsewhere in the state;

(B) Result in reductions in **per capita vehicle miles traveled** within the jurisdiction but without increasing greenhouse gas emissions elsewhere in the state; and

(C) Prioritize reductions that benefit overburdened communities in order to maximize the cobenefits of reduced air pollution and environmental justice.

(ii) Actions not specifically identified in the guidelines developed by the department pursuant to RCW **70A.45.120** may be considered consistent with these guidelines only if:

(A) They are projected to achieve greenhouse gas emissions reductions or **per capita vehicle miles traveled** reductions equivalent to what would be required of the jurisdiction under the guidelines adopted by the department; and

(B) They are supported by scientifically credible projections and scenarios that indicate their adoption is likely to result in reductions of greenhouse gas emissions or **per capita vehicle miles traveled**.

(iii) A jurisdiction may not restrict population growth or limit population allocation in order to achieve the requirements set forth in this subsection (9)(d).

GMA Comprehensive plans – Review procedures and schedules—Implementation progress report. (RCW 36.70A.130(9))

(9)(a) Counties subject to planning deadlines established in subsection (5) of this section that are required or that choose to plan under RCW **36.70A.040** and that meet either criteria of (a)(i) or (ii) of this subsection, and cities with a population of more than 6,000 as of April 1, 2021, within those counties, must provide to the department an implementation progress report detailing the progress they have achieved in implementing their comprehensive plan five years after the review and revision of their comprehensive plan. Once a county meets the criteria in (a)(i) or (ii) of this subsection, the implementation progress report requirements remain in effect thereafter for that county and the cities therein with populations greater than 6,000 as of April 1, 2021, even if the county later no longer meets either or both criteria. A county is subject to the implementation progress report requirement if it meets either of the following criteria on or after April 1, 2021:

(i) The county has a population density of at least 100 people per square mile and a population of at least 200,000; or

(ii) The county has a population density of at least 75 people per square mile and an annual growth rate of at least 1.75 percent as determined by the office of financial management.

(b) The department shall adopt guidelines for indicators, measures, milestones, and criteria for use by counties and cities in the implementation progress report that must cover:

(i) The implementation of previously adopted changes to the housing element and any effect those changes have had on housing affordability and availability within the jurisdiction;

(ii) Permit processing timelines; and

(iii) Progress toward implementing any actions required to achieve reductions to meet greenhouse gas and **vehicle miles traveled** requirements as provided for in any element of the comprehensive plan under RCW **36.70A.070**.

(c) If a city or county required to provide an implementation progress report under this subsection (9) has not implemented any specifically identified regulations, zoning and land use changes, or taken other legislative or administrative action necessary to implement any changes in the most recent periodic update in their comprehensive plan by the due date for the implementation progress report, the city or county must identify the need for such action in the implementation progress report. Cities and counties must adopt a work plan to implement any necessary regulations, zoning and land use changes, or take other legislative or administrative action identified in the implementation progress report and complete all work necessary for implementation within two years of submission of the implementation progress report.

Summary of per capita vehicle miles traveled (HB 1181 and RCW 47.80.100)

The department shall compile, maintain, and publish a summary of the per capita vehicle miles traveled annually in each city in the state, and in the unincorporated portions of each county in the state.

Attachment 2 – Washington State Department of Commerce Menu of Measures: Highest Priority Comprehensive Plan Measures for GHG Reduction[40]

Climate Measure (Goal or Policy) **[Note: Goals are highlighted yellow]**	**Climate Sector Nexus**	**Supplemental Description**	**Measure Type**	**Entry #**	**Highest Priority Measures** (red cells)	**GHG Sub-element Minimum Requirements**
Maximize conservation and carbon sequestration through alignment of Conservation Futures, Transfer of Development Rights (TDR), and Open Space Program strategies with the Climate Commitment Act	Agriculture & Food Systems	TDR, Conservation Futures, and Open Space Program strategies can foster carbon sequestration. It is a longer term (+ 5 years) assistance to GHG reduction. Biological variables should be researched and considered to retrieve maximum GHG reduction benefits.	GHG Reduction	30	**Red**	Requirement 1
Foster higher-intensity land uses in mixed-use urban villages and transit corridors.	**Zoning & Development**	**EJ note: Frontline Communities identified building dense, affordable communities around public transportation as an environmental justice priority.** **Develop overlay or master plans for urban villages and transit corridors -- "nodes and corridors" planning. Also, make any necessary code changes (zoning, design standards, parking, etc.) and develop incentives.**	**GHG Reduction**	**32**	**Red**	**Requirement 1** **Requirement2** **Requirement 3**
Implement multimodal transportation planning to reduce single-occupancy vehicle dependence and greenhouse gas emissions.	Transportation (roads, bridges, multimodal)	Develop mode-specific plans, such as bicycle and pedestrian plans, adopt complete streets policies and ordinances, and a multimodal transportation concurrency program.	GHG Reduction	35	**Red**	Requirement 1 Requirement2
Require additional net-zero greenhouse gas emission features of all new residential and commercial structures.	Buildings & Energy	Residential and commercial buildings use large amounts of electricity. Jurisdictions can amend building and land use regulations to require new residential and commercial buildings to utilize zero-emission GHG features, reducing GHG emissions and mitigating climate change.	GHG Reduction	36	**Red**	Requirement 1

[40] For an Excel version of the Menu of Measures, see https://deptofcommerce.box.com/s/n34kivgzn9rfe74jfz2vvzxqlrv7j9m9

Climate Measure (Goal or Policy) [Note: Goals are highlighted yellow]	Climate Sector Nexus	Supplemental Description	Measure Type	Entry #	Highest Priority Measures (red cells)	GHG Sub-element Minimum Requirements
Increase multimodal capacity in coordination with the location of higher-density housing and commercial centers.	Transportation (roads, bridges, multimodal)	Transportation and multimodal improvement considerations should be part of the permitting process beyond housing and road impact fee assessments. Transit-supportive residential densities are impactful to provide shorter trips and increase transit and nonmotorized usage. In some locations, such as freeway transit stations, the location of land uses may be best when tangential to the station and not concentrated within 600 feet.	GHG Reduction	37	**Red**	Requirement 1 Requirement2
Prioritize and promote public transit expansion and use through coordination of land use and transportation planning.	Transportation (roads, bridges, multimodal)	Development permits and public works transportation plans should be directly coordinated beyond impact fees. New developments and transit expansion must be considered simultaneously. Examples: bus rapid transit, transit fleet electrification, first- and last-mile connectivity to be considered with development.	GHG Reduction	53	**Red**	Requirement 1 Requirement2
Implement travel demand management (TDM) programs and strategies.	Transportation (roads, bridges, multimodal)	Commute trip reduction (CTR) programs and strategies are required for large employers (100+ employees). These programs can and should be scaled to fit smaller businesses in different jurisdictions and circumstances. Facilitate participation in the employer commute trip reduction program and expand the program beyond large employers. Provide workers with flexible work schedules and guaranteed rides home. CTR should be an integral part of expanding existing demand management programs. Encourage major employers to establish satellite offices, as well as remote and telework programs.	GHG Reduction	54	**Red**	Requirement 1 Requirement2
Ensure that buildings use renewable energy, conservation, and efficiency technologies and practices to reduce greenhouse gas emissions.	**Buildings & Energy**	**EJ note: Frontline communities identified the design, build, and retrofit of buildings for conserving energy, generating solar power, and weathering climate impacts as a top environmental justice priority.** **Residential and commercial buildings use large amounts of electricity. Jurisdictions can amend land use regulations to require new residential and commercial buildings to utilize**	**GHG Reduction**	**81**	**Red**	**Requirement 1 Requirement 3**

Climate Measure (Goal or Policy) [Note: Goals are highlighted yellow]	Climate Sector Nexus	Supplemental Description	Measure Type	Entry #	Highest Priority Measures (red cells)	GHG Sub-element Minimum Requirements
		renewable energy sources, reducing GHG emissions and mitigating climate change.				
Prioritize the adaptive reuse of buildings, recognizing the emission-reduction benefits of retaining existing buildings.	**Buildings & Energy**	**EJ note: Frontline communities identified maximizing the use of existing buildings and preserving peoples' ability to stay in their community and preventing displacement from green gentrification and hazards exacerbated by climate change as a top environmental justice priority.** **Adapting and reusing existing buildings avoids carbon emissions associated with building demolition, new building materials, transportation of those materials, and construction of a new building. Jurisdictions can incentivize reuse of existing buildings by waiving or reducing fees associated with the use and providing economic development grants for reuse of existing buildings.**	**GHG Reduction**	**84**	**Red**	**Requirement 1** **Requirement 3**
Retrofit buildings for energy efficiency.	Buildings & Energy	Develop requirements for updated insulation and replacement of back-up generators that rely on fossil fuels. Replace with onsite solar and storage systems, where feasible.	GHG Reduction	160	**Red**	Requirement 1 Requirement 3
Ensure public transit stops and stations are located at or near (e.g., within 600 ft.) dense commercial and employment areas.	Zoning & Development	Goals and policies in transportation and land use elements should be consistent and complimentary. Successful implementation of this measure should be coordinated with subarea or corridor planning to ensure that housing is near these transit facilities.	GHG Reduction	236	**Red**	Requirement 1 Requirement2
Reduce vehicle miles traveled to achieve greenhouse gas reduction goals.	**Transportation (roads, bridges, multimodal)**	**EJ note: Frontline Communities identified making it easier to not need a car by designing walkable and accessible neighborhoods and providing affordable public transportation as a top environmental justice priority.**	**GHG Reduction**	**240**	**Red**	**Requirement 1** **Requirement2** **Requirement 3**

Climate Measure (Goal or Policy) [Note: Goals are highlighted yellow]	Climate Sector Nexus	Supplemental Description	Measure Type	Entry #	Highest Priority Measures (red cells)	GHG Sub-element Minimum Requirements
Limit parking spaces near transit-oriented development to encourage use of transit and decrease single-occupancy vehicle travel.	Zoning & Development	This measure could be most effective if public works and planning efforts are coordinated. Goals and policies in transportation, land use elements and housing elements should be consistent and complimentary. Local government response to House Bill 1923 (laws of 2019) may provide an example of how to implement this measure. House Bill 1923 amended RCW 36.70A.620 to limit the amount of parking local governments planning under RCW 36.70A.040 may require for low-income, senior, disabled, and market-rate housing units located near high-quality transit service.	GHG Reduction	241	**Red**	Requirement 1 Requirement2
Create a safe, well-connected, and attractive bicycle and pedestrian transportation network to encourage active transportation.	Transportation (roads, bridges, multimodal)	Implementation of this policy could include a strategy to reduce pedestrian or bicycle and car collisions, beginning with overburdened communities with the highest rate of injury or death. Key to the success of this policy is to establish a safe and welcoming environment that includes lighting, visibility, landscaping, and active uses.	GHG Reduction	246	**Red**	Requirement 1 Requirement2
Establish a green belt of parks to support connectivity and non-motorized travel between housing, schools, and businesses across a community.	Ecosystems	Cities and urbanized counties (parks departments) should strategically set aside several pre-determined segments of park land throughout an urbanized area (example: 1-5 acres). They may or may not be connected. These parks may (if necessary) be developed with specific types of trees and other vegetation for maximum sequestration of carbon and absorption of stormwater. Local parks departments can collaborate with neighboring jurisdictions, tribes, state, and federal agencies to connect these green areas and secure funds for trails and other investments. This policy could also be implemented as part of an open space plan. Urban greening projects can deliver significant benefits to cities and local community neighborhoods. Creating and connecting green environments can provide mental and physical	GHG Reduction	250	**Red**	Requirement 1 Requirement2

Climate Measure (Goal or Policy) [Note: Goals are highlighted yellow]	Climate Sector Nexus	Supplemental Description	Measure Type	Entry #	Highest Priority Measures (red cells)	GHG Sub-element Minimum Requirements
		health benefits including safe and equitable spaces accessible to all residents and users. Creating parks can provide both carbon sequestration and resilience benefits.				
Maximize tree canopy coverage in surface parking lots.	Ecosystems	Tree canopies in surface parking lots can contribute to carbon sequestration inside an urbanized area in the long term (5 - 10yrs). Biological factors (tree types, soils) should be researched and considered for maximum sequestration benefits in the long term.	GHG Reduction	251	**Red**	Requirement 1
Prioritize infill development through zoning and permitting process.	Zoning & Development	A jurisdiction could encourage infill by including incentives such as reduction of impact fees or reduction of permitting fees. Counties and cities can adjust impact fees and impact fee programs through comprehensive plans.	GHG Reduction	252	**Red**	Requirement 1 Requirement2
Increase or remove density limits in areas well-served by transit and other services within the urban growth area.	Zoning & Development	This measure could be most effective if public works and planning efforts are coordinated. Goals and policies in transportation, land use and housing elements should be consistent and complimentary.	GHG Reduction	253	**Red**	Requirement 1 Requirement2
Increase housing diversity and supply within urban growth areas to reduce greenhouse gas emissions and support environmental justice.	**Zoning & Development**	**EJ note: Frontline Communities identified building dense, affordable communities around public transportation as an environmental justice priority.** **Zoning density increases are enablers on GHG reduction. Zoning density increases should allow for increases in mass transit. Increases in mass transit uses should result in decreased VMT. GHG reductions should result from reduced VMT.**	**GHG Reduction**	**254**	**Red**	**Requirement 1 Requirement2 Requirement 3**
Allow middle housing types, such as duplexes, triplexes, and ADUs, on all residential lots.	Zoning & Development	This measure can facilitate increases in density. It could be most effective if public works and planning efforts are coordinated. Goals and policies in transportation, land use and housing	GHG Reduction	256	**Red**	Requirement 1 Requirement2

Climate Measure (Goal or Policy) [Note: Goals are highlighted yellow]	Climate Sector Nexus	Supplemental Description	Measure Type	Entry #	Highest Priority Measures (red cells)	GHG Sub-element Minimum Requirements
		elements should be consistent and complimentary.				
Phase out natural gas use in existing publicly owned facilities by [insert target date] and retrofit with electric heat pumps.	Buildings & Energy	***Note: Be advised that I-2066, approved by Washington voters in November 2024, prevents counties, cities, and towns from adopting this policy and other policies that prohibit, penalize or discourage natural gas heating in buildings and appliances and equipment within buildings. Check with your jurisdiction's legal counsel about impacts to your jurisdiction.*** Replacing natural gas power and heat systems with electric heat pumps in public facilities can make the facilities carbon-neutral and reduce GHG emissions. Burning natural gas produces fewer GHG emissions than burning oil, but natural gas is still a fossil fuel that contributes to climate change. Build in policies within local comprehensive plans' climate and utilities elements that support renewable energy sources.	GHG Reduction	259	**Red**	Requirement 1
Increase residential densities near (within 600 feet) high-use transit stations and centers.	Zoning & Development	This measure refers to allowing middle housing types or multifamily developments in areas that may currently not be zoned for those uses.	GHG Reduction	262	**Red**	Requirement 1 Requirement2
Improve and expand urban forest management to maximize or conserve carbon storage.	Ecosystems	Urban forests provide carbon sequestration and climate resilience benefits. Implementing this policy will require developing an urban forest management plan that includes an assessment of carbon sequestration. Trees in urban areas or urban forests can influence air temperatures, building energy use, and consequently alter carbon emissions from numerous urban sources. Local governments can implement strategies such as changing zoning codes for tree retention,	GHG Reduction	410	**Red**	Requirement 1

Climate Measure (Goal or Policy) [Note: Goals are highlighted yellow]	Climate Sector Nexus	Supplemental Description	Measure Type	Entry #	Highest Priority Measures (red cells)	GHG Sub-element Minimum Requirements
		minimizing development disturbance areas, and acquiring and restoring forested open space and parks. Technical support may be required to estimate or interpret estimates and design management plans.				
Increase tree canopy cover to boost carbon sequestration, reduce heat islands, and improve air quality, prioritizing overburdened communities.	**Ecosystems**	**EJ note: Frontline communities identified using land and plants to absorb carbon pollution and prioritizing this work in frontline communities as an environmental justice priority.** **Parks departments should be able to initiate increases in tree canopy. Subsequent sequestration and air quality improvements depend on a number of variables, especially tree types and soil types.**	**GHG Reduction**	**418**	**Red**	**Requirement 1 Requirement 3**
Eliminate parking minimum requirements, and establish parking maximums.	Transportation (roads, bridges, multimodal)	This policy, which could be implemented in a development code, could help reduce impervious surfaces that exacerbate stormwater runoff and the urban heat island effect. This policy also could encourage active-transportation (walking, biking, riding transit) alternatives to driving automobiles; this reduces emissions, improves community health, and supports other co-benefits.	GHG Reduction	422	**Red**	Requirement 1 Requirement2
Improve transit speed, frequency, coverage, and reliability.	Transportation (roads, bridges, multimodal)	Local jurisdictions could expand public transit through additional routes, frequency of stops, and other mechanisms as identified by the community needs. Cities may choose to "buy" more transit service from service provider, including purchasing more buses or transit service. Invest in ensuring 30-minute headways throughout all bus routes. This measure could also include developing new transit routes and expanding transit service. Finally, jurisdictions could implement "last-mile" strategies (shuttles, ride-sharing, bike-sharing), beginning with frontline communities, people with physical impairments, children and elderly transit riders.	GHG Reduction	429	**Red**	Requirement 1 Requirement2 Requirement 3

Climate Measure (Goal or Policy) [Note: Goals are highlighted yellow]	Climate Sector Nexus	Supplemental Description	Measure Type	Entry #	Highest Priority Measures (red cells)	GHG Sub-element Minimum Requirements
Incentivize green building certification to improve energy and environmental performance.	Buildings & Energy	Cities and counties could provide structural and financial incentives (e.g., density bonuses and tax credits) to developers to certify projects under a third-party standard (e.g., the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) certification standard).	GHG Reduction	430	**Red**	Requirement 1
Identify, protect, and restore submerged aquatic vegetation (eelgrass, kelp, etc.) that provides aquatic habitat, "blue" carbon storage, and other ecosystem services.	Ecosystems	Aquatic vegetation such as eelgrass and kelp provide both carbon sequestration and resilience benefits such as reducing erosion, locally mitigating acidification, and providing habitat for valued species. Shoreline master programs require protection and mitigation for impacts to this type of aquatic vegetation through critical saltwater habitat or similar critical areas protection standards. Local governments can work with researchers and State agencies to understand the cumulative impacts of permitted activities on aquatic vegetation and identify if stronger protections or different approaches are needed to protect aquatic vegetation and blue carbon.	GHG Reduction	442	**Red**	Requirement 1
Implement complimentary, mixed land uses versus traditional zoning, such as locating business districts, parks and schools in neighborhoods to promote cycling and walking and reduce driving.	Zoning & Development	Creating walkable, accessible communities with mixed-use developments can reduce VMTs and subsequent GHG emissions from vehicles. The majority of Washington cities are zoned single-family and do not allow for commercial uses adjacent or integrated within the residential area. Amending comprehensive plans and land use regulations to require mixed-use developments can facilitate GHG reductions.	GHG Reduction	450	**Red**	Requirement 1 Requirement2
Facilitate increased land access for local farmers, providing affordable agricultural land ownership or long-term, stable leases.	Agriculture & Food Systems	High land acquisition costs are among barriers that make it difficult for new, local farmers to access land to grow local food. Counties could promote existing local land trust programs. Counties could also offer tax incentives to help lower land costs for farmers. Promoting local food economies and local agricultural or farming businesses should reduce water and air pollution (including greenhouse gas emissions) associated with shipping and distribution production pathways.	Resilience GHG Reduction	451	**Red**	Requirement 1 Requirement 3

Climate Measure (Goal or Policy) [Note: Goals are highlighted yellow]	Climate Sector Nexus	Supplemental Description	Measure Type	Entry #	Highest Priority Measures (red cells)	GHG Sub-element Minimum Requirements
Prioritize, develop, and maintain mobility hubs in transportation-efficient locations — especially in overburdened communities experiencing a scarcity of transportation alternatives.	Transportation (roads, bridges, multimodal)	Mobility hubs are centralized locations where people can access multiple transportation modes (e.g., bike share, transit, and micromobility devices). Mobility hubs need to be adapted to specific contexts and settings both in terms of the type of components and their scale. For example, a city center rail hub may offer more space to public transport and bike share bikes whereas a hub in a market town center or transport corridor interchange may focus on providing a smaller number of vehicles but greater choice of flexible travel options between housing and jobs. Mobility hubs should be planned as network-integrated with public transport and other active transportation components as a key part of planning strategy for optimal impacts. The development of mobility hubs may be an incremental upgrade of sites as opportunities arise such as: new or refurbishment of middle and multifamily housing plus commercial development; upgrade of rail, trolley, bus or rapid-bus route stops; utility service work; introduction of electric vehicle infrastructure.	GHG Reduction	478	**Red**	Requirement2 Requirement 3
Promote purchasing from local businesses to support economic development and reduce emissions associated with the transportation, production, and distribution of goods.	Economic Development	This policy could be implemented as part of a broader economic resilience or sustainability strategy with local businesses, community-based organizations, and other partners.	GHG Reduction	480	**Red**	Requirement2
Promote the sale and use of agricultural supplies, pesticides, fertilizers, and fuels that are not derived from fossil fuels.	Agriculture & Food Systems	Education and marketing could be initiated at local farmer cooperatives.	GHG Reduction	487	**Red**	Requirement 1

Climate Measure (Goal or Policy) [Note: Goals are highlighted yellow]	Climate Sector Nexus	Supplemental Description	Measure Type	Entry #	Highest Priority Measures (red cells)	GHG Sub-element Minimum Requirements
Prioritize the preservation and weatherization of housing in overburdened communities, particularly at higher densities, to reduce emissions and increase resilience.	Buildings & Energy	Financial assistance should be prioritized for existing tenants at risk of displacement from green gentrification.	GHG Reduction	489	**Red**	Requirement 1 Requirement 3
Adjust single-family home impact fees and system development charges so those homes with larger impacts on utilities pay more.	Zoning & Development	Incentivize smaller single family homes - carbon footprints.	GHG Reduction	492	**Red**	Requirement 1 Requirement2 Requirement 3
Prohibit the expansion of polluting industries in overburdened communities via local zoning and development regulations.	Zoning & Development	Jurisdictions could use the Washington Department of Health's Environmental Health Disparities Map to help identify overburdened communities juxtaposed to pollution sources.	GHG Reduction	494	**Red**	Requirement 3
Provide low-income residents subsidies to purchase or lease electric vehicles and bicycles.	Transportation (roads, bridges, multimodal)	A county or city could set aside a budget portion that could be distributed to low-income residents via direct application. An applicant would supply proof of income and a quote on the price or lease terms of an electric vehicle. The subsidy could be 1-3% of the cost of a vehicle.	GHG Reduction	498	**Red**	Requirement 1 Requirement 3
Facilitate the siting of complimentary destinations such as commercial-employment centers, schools or education centers, and residential developments.	Transportation (roads, bridges, multimodal)	Jurisdictions should use zoning to co-locate complimentary developments that help reduce VMT and encourage transit ridership.	GHG Reduction	500	**Red**	Requirement 1 Requirement2
Prioritize permitting for transit-oriented development (TOD) proposals.	Transportation (roads, bridges, multimodal)	This is an enabling policy that should reduce future VMT.	GHG Reduction	502	**Red**	Requirement 1 Requirement2

Climate Measure (Goal or Policy) [Note: Goals are highlighted yellow]	Climate Sector Nexus	Supplemental Description	Measure Type	Entry #	Highest Priority Measures (red cells)	GHG Sub-element Minimum Requirements
Reduce parking requirements where there are multimodal options available.	Transportation (roads, bridges, multimodal)	This policy will help reduce vehicle miles traveled by supporting other modes of transportation.	GHG Reduction	505	**Red**	Requirement 1 Requirement2
Address active transportation and other multimodal types of transportation options in concurrency programs – both in assessment and mitigation.	Transportation (roads, bridges, multimodal)		GHG Reduction	541	**Red**	Requirement 1 Requirement2 Requirement 3