



Addressing Climate Change in Comprehensive Plans

March 2024 update

The Washington Department of Commerce published planning [guidance](#) at the end of 2023 to help cities and counties address climate change in their comprehensive plans. The following FAQ, which Commerce will update periodically, addresses how local jurisdictions should create a climate element that reduces greenhouse gas emissions and builds community resilience to floods, droughts, and other hazards exacerbated by climate change.

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Does my jurisdiction need to plan for climate change?

[HB 1181](#), signed into law in 2023, adds a climate and resiliency goal ([Goal 14](#)) to the state's [Growth Management Act](#). Cities and counties that [fully plan](#) under the GMA must include a climate element in their next comprehensive plan update. See Commerce's [GMA Periodic Update](#) page for applicable deadlines.

Does my climate element need to be a new chapter?

No. A city or county may adopt its climate element as a single comprehensive plan chapter or spread its climate goals and policies across several chapters (e.g., housing, land use, and transportation) [see [model climate element example](#) in Chapter 5 of Commerce's guidance]. The climate element should include one or both sub-elements, depending on your jurisdiction's regulatory requirements:

- A climate resilience sub-element (preparedness, response, recovery) is mandatory for all jurisdictions that are fully planning under the GMA. A hazard mitigation plan in substantial conformance with Commerce's guidance could be adopted, by reference, to satisfy the resilience sub-element requirements.
- A GHG emissions reduction sub-element (mitigation) is mandatory for 11 of the state's largest and fastest-growing counties and their cities [see [table below](#)] and requires measures to reduce greenhouse gas (GHG) emissions and per capita vehicle miles traveled (VMT). The new law applies to cities with a population greater than 6,000, as of April 1, 2021, within the applicable counties.

Counties (and cities*** within) required to develop a resilience sub-element and a GHG emissions reduction sub-element*	2025	2026	2029** Progress Report	
○ Benton	X	X		
○ Clark				
○ Franklin		X		
○ King				
○ Kitsap	X		X	<p>**Note 1: For those fully planning jurisdictions not listed in this table, <u>only</u> the resilience sub-element is mandatory.</p> <p>**Note 2: The jurisdictions with the first implementation progress reports due in 2029 are only required to update two elements – the transportation element and add a climate element (greenhouse gas emissions reduction sub-element and a resilience sub-element).</p> <p>***Note 3: Applies to cities with a population greater than 6,000 based on 2021 OFM data.</p>
○ Pierce			X	
○ Skagit				
○ Snohomish			X	

Counties (and cities*** within) required to develop a resilience sub-element and a GHG emissions reduction sub-element*	2025	2026	2029** Progress Report
<input type="radio"/> Spokane		X	
<input type="radio"/> Thurston	X		
<input type="radio"/> Whatcom	X		

How often must my jurisdiction update its climate element, and how long will it take?

Cities and counties should create their climate element and then review and revise it at least once every 10-year comprehensive plan periodic update cycle, based on best available science, updated modeling, and other information. This work should take about 12-24 months, concurrent with your broader plan update.

What does my jurisdiction's implementation progress report need to include?

Fully planning cities and counties must provide Commerce a report detailing the progress they have achieved in implementing their comprehensive plan five years after its revision and adoption. The report must assess progress toward implementing actions required to achieve reductions to meet GHG and VMT requirements as provided for in any element of the comprehensive plan under [RCW 36.70A.070](#)

Does my jurisdiction's climate element need to include specific goals and policies?

Each sub-element must meet the **minimum requirements** summarized below to be consistent with state law. See [Section 3](#) of the Commerce's planning guidance for more information about the resilience sub-element requirements, and see [Section 4](#) for more information about the GHG reduction sub-element requirements.

Resilience sub-element minimum requirements:

The resilience sub-element should include at least one goal and supportive policy for each climate-exacerbated hazard that is relevant to your jurisdiction. The sub-element should also prioritize actions that benefit overburdened communities that will suffer disproportionately from compounding environmental impacts (e.g., air and water pollution) and be most impacted by climate exacerbated hazards (e.g., extreme heat). The suite of goals and policies must:

- **Requirement 1:** Address natural hazards created or aggravated by climate change, including sea level rise, landslides, flooding, drought, heat, smoke, wildfire, and other effects of changes to temperature and precipitation patterns;
- **Requirement 2:** Identify, protect, and enhance natural areas to foster climate resilience, as well as areas of vital habitat for safe species migration;
- **Requirement 3:** Identify, protect, and enhance community resilience to climate impacts, including social, economic, and built-environment factors, which support adaptation to climate impacts consistent with environmental justice.

Commerce also encourages jurisdictions to include in their resilience sub-element goals and policies within all 11 of the guidance's [sectors](#). Jurisdictions may develop their own goals and policies, as well as select ones from Commerce's climate [Menu of Measures](#).

GHG reduction sub-element minimum requirements:

The GHG reduction sub-element should be developed with a target of reaching net-zero emissions by 2050. Mitigation measures should, at a minimum, include goals and supportive policies within each of the following sectors: Transportation; Buildings & Energy; and, Zoning & Development. The suite of goals and policies within a sub-element must:

- **Requirement 1:** Result in reductions in overall greenhouse gas emissions generated by transportation and land use within the jurisdiction but without increasing emissions elsewhere in Washington;
- **Requirement 2:** Result in reductions in per capita vehicle miles traveled within the jurisdiction but without increasing greenhouse gas emissions elsewhere in Washington; and,
- **Requirement 3:** Prioritize reductions that benefit overburdened communities in order to maximize the co-benefits of reduced air pollution and environmental justice.

Jurisdictions may develop their own mitigation goals and policies, as well as select ones from Commerce's climate Menu of Measures, to address the GHG reduction sub-element's minimum requirements. Mitigation policies will be considered consistent with Commerce's 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.

What planning steps and pathways should my jurisdiction take?

The resilience sub-element guidance (Section 3) includes four essential steps and one optional step: Start by taking the first two steps to explore local climate impacts (required Step 1) and identify resilience policy gaps and opportunities (required Step 2). Conclude Step 2 by determining whether your jurisdiction needs to conduct a climate vulnerability and risk assessment (optional Step 3) or whether your jurisdiction is ready to choose goals and policies (required Step 4) for integration into the comprehensive plan (required Step 5).

Your jurisdiction may take any one or a combination of Section 3's pathways, which include: select or adapt existing goals and policies (Pathway 1); develop new ones (Pathway 2); and, update a hazard mitigation plan and adopt it, by reference, in the comprehensive plan (Pathway 3).

The GHG reduction sub-element planning guidance (Section 4) also includes three pathway options: estimate GHG emissions (Pathway 1); evaluate vehicle miles traveled (Pathway 2); and, create a GHG Inventory (Pathway 3). Your jurisdiction may pursue one or a combination of pathways, depending on its regulatory requirements:

- **Voluntary jurisdictions:** Cities and counties that are not required to create a GHG reduction sub-element (in other words, those that are outside of the 11 counties identified above) may pursue any one or a combination of the pathways. Commerce recommends pursuing Pathways 1 and 2 (combined) or Pathway 3 (by itself) to satisfy the minimum requirements.
- **Mandatory jurisdictions:** Cities and counties that are required to create a GHG reduction sub-element should pursue Pathway 3.

Jurisdictions that voluntarily seek Commerce's approval of their GHG reduction sub-element¹ must notify Commerce in writing at least 120 days in advance of their intent to submit. Counties voluntarily seeking approval should use a Commerce-provided GHG emissions inventory² and select mitigation goals and policies to satisfy the minimum requirements. Cities voluntarily seeking approval should use their own emissions inventory and may utilize Pathway 3 guidance and planning grants.³

Does my jurisdiction need to follow Commerce's climate planning guidance if we are updating our hazard mitigation plan and adopting it, by reference, in the comprehensive plan?

Yes. All jurisdictions that are required to have a resilience sub-element should follow the steps in Section 3 of Commerce's guidance. The guidance is designed so that all jurisdictions start by using the Climate Mapping for a Resilient Washington [webtool](#) [Section 3, Step 1] as a source of best available science to assess local climate impacts and end with selecting and prioritizing policies. The steps [updating a hazard mitigation plan is Section 3, Step 4, Pathway 3] will help jurisdictions integrate climate change into their hazard mitigation plan's analysis and measures and meet FEMA and Commerce requirements. A jurisdiction may also adopt supplemental goals and policies directly into the comprehensive plan for better integration.

Is GHG reduction sub-element Pathway 3 (emissions inventory) required or strongly recommended for mandatory jurisdictions?

Pathway 3 utilizes an emissions inventory, which is the best way to measure emissions, set targets, select goals and policies, and track implementation progress. For these reasons, and from a best available science standpoint, Commerce recommends that mandatory jurisdictions required to adopt a GHG reduction sub-element pursue Pathway 3.

¹ See [HB 1181 Sec. 6](#) for the GHG reduction sub-element approval process.

² Commerce is creating emissions inventories for the 11 counties that are required to include a GHG reduction sub-element in their comprehensive plan. The inventories use 2022 as a baseline year but do not disaggregate emissions to the city level.

³ Cities may use an existing emissions inventory (for example, one that was created as part of a climate action plan), or they may develop a new inventory using Pathway 3's guidance and Commerce's planning grants.

Will GHG reduction sub-element Pathway 3 (emissions inventory) enable my jurisdiction to measure and reduce per capita vehicle miles traveled?

Yes. Local jurisdictions may obtain city- and county-level [VMT data](#) (Highway Performance Monitoring System) from the Washington State Department of Transportation and divide the VMT figures by [population](#) to calculate per capita VMT. The jurisdictions may then use U.S. EPA's [Emission Factors Hub](#) (by vehicle and fuel type) to calculate VMT-related GHG emissions. This work will help cities and counties set local targets, select goals and policies for the comprehensive plan, and track progress reducing per capita VMT and associated GHGs over time.

Does my jurisdiction need to address communitywide emissions in its inventory?

Yes. Cities and counties should develop their GHG reduction sub-element with an overall target of reaching net-zero emissions in 2050 — commensurate with Washington's emissions-reduction [target](#). Cities and counties should take actions to reduce emissions from government operations, as well as work with public- and private-sector partners to reduce communitywide emissions within the local jurisdiction's borders.

How should my jurisdiction decide which Menu of Measures policies to select for its plan?

Commerce's Menu of Measures includes model climate mitigation and resilience goals and policies that cities and counties may select and adapt in their climate element. Section 5 of the guidance explains the attributes of the model measures and includes additional criteria (e.g., feasibility and cost) cities and counties may use to select and prioritize policies for their climate element. Commerce prioritized the Menu's policies, factoring in their co-benefits, potential to support environmental justice, and other criteria. Top-scoring Menu policies are described as "priority measures" and marked with a red dot.

Will Commerce approval of GHG reduction sub-elements mean that they cannot be appealed?

No. However, if Commerce approves your GHG reduction sub-element and it is appealed, Commerce will defend its decision before the Growth Management Hearings Board.

Does Commerce have checklists for updating its climate element?

Yes. Commerce's periodic update checklists for fully planning [cities](#) and [counties](#) include a climate element section. Commerce is also revising the checklist concurrent with the rulemaking process for HB 1181.

How often will Commerce update its planning guidance?

Commerce will publish revised guidance in late 2025, following the rulemaking process for HB 1181. Commerce must update its guidance every five years thereafter, based on the most recently available data, and provide an annual process for cities, counties, and other parties to submit alternative actions for consideration for inclusion into the guidance.

Is Commerce providing local jurisdictions funding to complete this work?

Yes. Commerce is providing local jurisdictions approximately \$30 million in grants during the '23-'25 biennium to support development and implementation of climate elements. Commerce will hold an annual application period for climate planning grants. For more information, visit Commerce's Climate Program [website](#). Also, check Growth Management Services' [grants page](#) for other opportunities.

Emissions Inventories FAQs

The questions and answers below, which are organized by scope and other topics, pertain to the GHG emissions inventories that Commerce is providing to the 11 counties that are required to create a GHG sub-element.

Scope

What is the scope of the Commerce-provided emissions inventories?

The inventories will include all Scope 1 and 2 emissions within the 11 counties. Inventories will be available in June 2024 for Clark, Skagit, Thurston, Whatcom, and King counties. Inventories will be available in spring 2025 for Benton, Franklin, Spokane, Kitsap, Pierce, and Snohomish counties.

Will government operations inventories be done just for county operations, or will it include city operations?

The government operations inventories will include only county government operations.

Will tribal lands be included in this inventory?

Yes, all lands within the county will be included.

If a city within our county has already completed emission inventories, can we include that in this effort?

The countywide inventory will include emissions from cities within the county, but not in a manner that would allow the city inventory to be separated from the countywide inventory. We also cannot guarantee that the countywide GHG inventory uses the same data and methodology as the city inventory. If there are existing inventory efforts that have been completed, the project team will aim to be consistent with those methodologies while also balancing other methodology needs (e.g., alignment with protocols, alignment across counties).

Methodology

ClearPath uses a trees and land use protocol – will this project accommodate that?

Commerce's project team will be completing a technical scoping process to identify the tools and methodologies that will be used in the GHG inventories. The Forest Land and Trees appendix of the U.S.

Community Protocol for Accounting and Reporting of Greenhouse Gas Emissions and associated tools and resources will be consulted during this process.

What tool will be used for VMT estimation?

This will be determined during a scoping period after Commerce's project team has reviewed the data each metropolitan planning organization (MPO) and county are already using. The Washington State Department of Transportation (WSDOT) has county-level data that can be leveraged, but in order to obtain more granular data, the team may supplement WSDOT's data with other sources, as needed.

Carbon Wedge Analysis

Will there be a carbon wedge for the government operations inventories or just community?

The carbon wedge — which helps illustrate the impacts various policies and climate actions could have on reducing each county's future emissions — will only be provided for the communitywide GHG inventories.

Within the wedge analysis, is there any potential for pre-built alternatives that can be modified without toggling every individual setting? For example, related to changes to the federal landscape.

Commerce's project team will discuss design needs for the wedge analysis tool during the technical scoping process. Wedge assumptions are based on best information available at the time and are provided in a transparent manner within the tool. It could be feasible to make those assumptions dynamic to reflect changing policy conditions and assumptions.

Will the wedge analysis be done using the ClearPath tool?

No. The wedge analysis tool will be Excel-based in order to optimize functionality and customization. It may be possible to transfer the wedge data into ClearPath using user-defined measures; the project team can provide guidance for this transfer, if desired.