

Whatcom Environmental Council

Rodd Pemble, President
Retired Recycling Manager

Jean Melious, Vice President
Retired WWU Professor

David Stalheim, Secretary-Treasurer
Retired Planning Director

Charlie Brown
Retired Process Engineer

Rick Eggerth
Retired Litigation Attorney

Oliver Grah
*Retired Physical Ecologist and
Water Resource Manager*

Cynthia Mitchell
Retired Energy Economist

Barry Wenger
Retired Ecology Planner

Email:
whatcomec@gmail.com

Website:
www.whatcomenvirocouncil.org

July 14, 2026

TO: Whatcom County Council

RE: Comments on Chapter 12, Climate

Thank you for the opportunity to comment on the proposed update to Whatcom County's Comprehensive Plan (Draft Plan). This letter focuses on the Growth Management Act (GMA) requirements for a climate element, and primarily addresses issues in Chapter 12, Climate.

1. Summary

Whatcom County has worked to be a leader in climate action. In 2021, the Council approved a [Climate Action Plan](#).¹ In 2022, the Council approved a resolution² supporting a transition to low- or zero-emission transportation system. At the onset of this GMA update, the Council passed a resolution³ establishing priorities for the GMA update which included incorporating climate change mitigation, adaptation, resilience, and greenhouse gas (GHG) emission reduction throughout the Comprehensive Plan.

These priorities must be implemented in compliance with the GMA. In 2023, the Legislature approved an Act⁴ to improve the state's response to climate change through updates to GMA and other statutes. The GMA and the subsequent guidelines published by the Department of Commerce outline three requirements for Draft Plan:

- Result in GHG reductions overall without increasing emissions elsewhere in Washington;
- Result in reductions in per capita vehicle miles traveled (VMT) within the jurisdiction but without increasing greenhouse gas emissions elsewhere in Washington; and
- Prioritize GHG reductions that benefit overburdened communities to maximize the co-benefits of reduced air pollution and environmental justice.

¹ [Resolution 2021-049](#)

² [Resolution 2022-033](#)

³ [Resolution 2022-036](#)

⁴ [Chapter 228, Laws of 2023 \(HB1181\)](#)

The Draft Plan falls short of meeting GMA requirements to reduce GHG emissions and VMT, and to prioritize GHG reductions that benefit overburdened communities. We offer the following recommendations:

- Adopt the 2021 Climate Action Plan (CAP) by reference into the Comprehensive Plan. There are details and specific obligations within the CAP that are missing from the Draft Plan.
- Revise and adopt actions to ensure that the Draft Plan meets GMA requirements to reduce GHG and VMT. The GMA requires (not suggests) that the Draft Plan reduce GHG emissions and per capita vehicle miles traveled. The Draft Plan needs to be revised to include strong, directive policies with specific dates and targets to ensure compliance. The Draft Plan does not comply with the GMA because it will increase, not decrease, GHG and VMT.
- The County should not approve the Draft Plan because it incorporates Bellingham's adopted Comprehensive Plan (Bellingham Plan), which fails to meet GMA requirements for GHG and VMT reduction.⁵
 - GHG emissions in Bellingham increased 38% from 2002 to 2023, with yearly emissions increasing every year since 2015. The Bellingham Plan does not ensure that GHG emissions will be reduced in compliance with the GMA.
 - The Bellingham Plan shows an increase in per capita vehicle miles traveled. The Bellingham Plan failed to adopt any reduction targets or milestones to monitor progress, instead relying on vague aspirational policies in the hopes that reductions would occur.
 - The Bellingham Plan's failure to comply with the GMA contributes to the Draft Plan's failure to comply with the GMA.

2. **Need to Incorporate the 2021 Climate Action Plan by Reference**

Chapter 12 of the Draft Plan states that the 2021 Climate Action Plan (CAP) was reviewed for consistency with the Climate Element.⁶ While it may be consistent, the proposed Climate Element does not include many policies and obligations set forth in the 2021 CAP. We recommend that the County adopt the 2021 Climate Action Plan (CAP) by reference in the Comprehensive Plan.

There is a fundamental difference in the treatment of climate as it relates to industries in the Draft Plan and the CAP. In Chapter 12, the Buildings and Energy section includes industrial uses,⁷ but it does not include any of the CAP's nine subgoals specific to industry. The CAP identifies the significant GHG emissions from industry:

⁵ Whatcom Environmental Council has filed an appeal of the Bellingham Plan to the Growth Management Hearings Board on the grounds, *inter alia*, that the Bellingham Plan fails to comply with GMA requirements to reduce GHG emissions and VMT. Whatcom Environmental Council v. City of Bellingham, 26-2-0012 (filed Feb. 17, 2026), available at <https://elaho2022.my.site.com/casemanager/s/case/500eq000017qxab/detail>.

⁶ Chapter 12 – Climate, p. 12-2.

⁷ Chapter 12 - Climate, p. 12-6.

Whatcom County has a GHG problem greater than many of the counties in the state. Cherry Point is home to two refineries, an aluminum smelter and a gas-fired thermal power plant that combined, were responsible for an astounding 51% of Whatcom County's GHG emissions in 2017 (Fig. 2.2)."⁸

The CAP then maps a multi-prong cap-and-invest strategy⁹ and establishes a policy for reductions by GHG-emitting industries:

In order for Whatcom County to reduce its GHG emissions, the industries responsible for point-source emissions need to use new greener technologies for refining processes now, and plan to respond to future demands by reducing the production of refined petroleum products as internal combustion engine (ICE) technology and gasoline continue to lose market share."¹⁰ (emphasis added)

Chapter 12 fails to incorporate these policies to require greener technologies and to reduce the production of refined petroleum products. Even though Cherry Point receives free GHG credits through 2035 and is not subject until then to the cap on emissions, Cherry Point should begin the process of transitioning away from fossil fuels to renewable energy. The CO₂e data 2017-2022 indicates that industrial gas use has increased 153% (Whatcom County "Greenhouse Gas Emissions Trends", November 2024, by Cascadia Consulting Group, Table 2, p. 8). Going forward, that number should come down.

3. The GMA Requires Measurable Actions to Reduce GHG and VMT

The GMA states that the County "must identify ... actions [it] will take ... that will ... result in reductions in overall greenhouse gas emissions...reductions in per capita vehicle miles traveled...; and... prioritize reductions that benefit overburdened communities..."¹¹

The Department of Commerce guidelines direct the County to "use strong and directive verbs, where possible, and amend development regulations such as zoning or building standards to ensure that [the county's] measures achieve reduction in GHG emissions and per-capita VMT."¹²

The Draft Plan is filled with aspirational policies that are not directive or measurable. The policies fail to establish how and when policies will be implemented and what entity is responsible for implementing the policies. For example, Policy 12G-1, Goal 2ZZ, and subsequent policies, do not alter the Final

⁸ Climate Action Plan, November 9, 2021, p. 42. Emissions have increased since the 2017 inventory assessment that is the basis for the refineries' share of County GHG emissions.

⁹ Climate Action Plan, November 9, 2021, p. 43. The Intalco Alumina Smelter is no longer operating. AltaGas is operating – and has significantly expanded – an import/export LPG terminal at the former Intalco dock, contributing to GHG emissions.

¹⁰ Climate Action Plan, November 9, 2021, p. 43.

¹¹ RCW 36.70A.070(9)(d)(i).

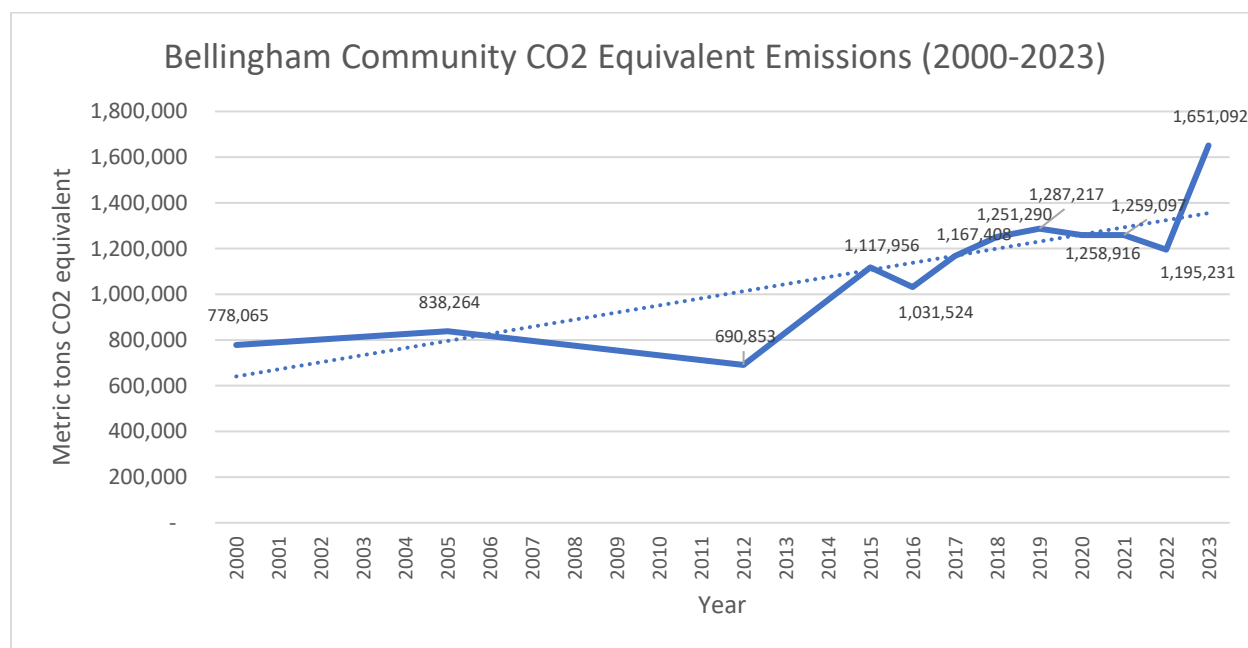
¹² Climate Planning Guidance, December 2025, p. 59.

Environmental Impact Statement’s conclusion that **all** alternatives will increase per capita vehicle miles traveled. The Draft Plan’s statement that the County will “support” efforts and various ways to reduce per capita vehicle miles traveled is not directive or measurable. “Support” needs to be replaced by “require”, with directives as to how and when the County will implement policies.

4. The County Should Not Adopt a Draft Plan that Incorporates the Bellingham Plan, Which Does Not Meet GMA Requirements to Reduce GHG and VMT.

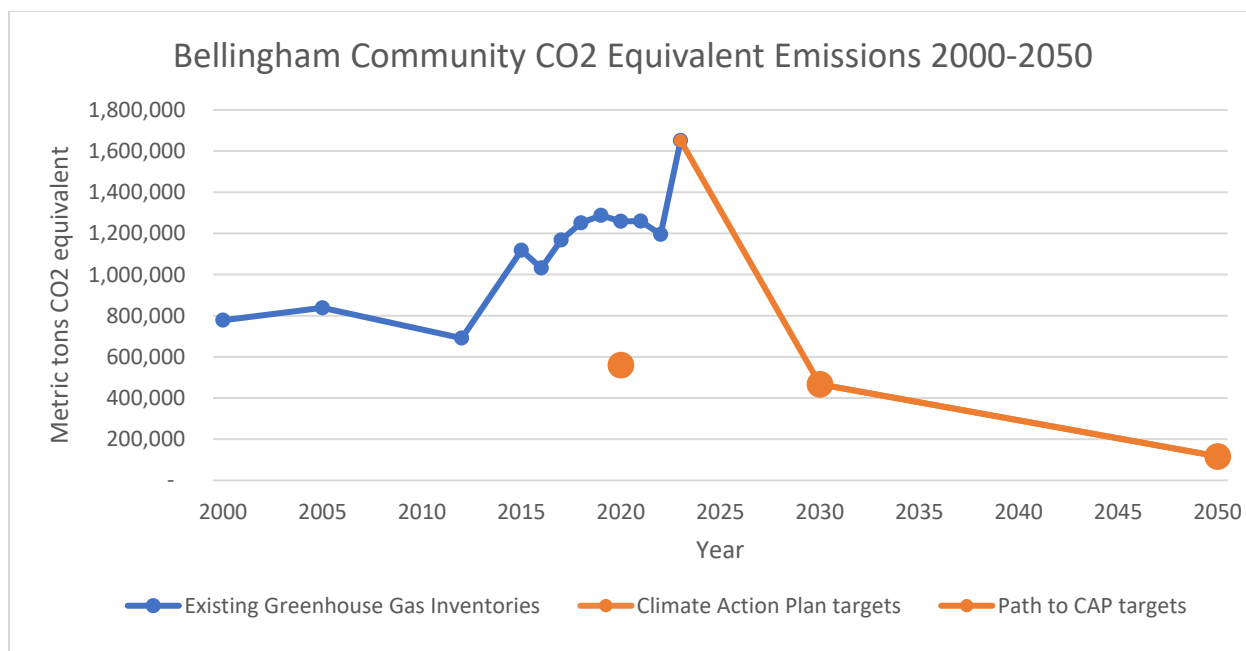
Whatcom County is responsible for ensuring that the Climate Element results in a reduction of GHG emissions and per capita VMT. This responsibility is coupled with the requirement to designate urban growth areas (UGAs). Bellingham also must comply with GMA climate requirements, and the Bellingham Plan’s failure to meet those requirements implicates the County’s actions with respect to Bellingham’s UGA and contributes to the failure of the Draft Plan to meet GHG and VMT reduction requirements.

Bellingham completed a GHG emissions inventory in 2023 which showed that there was a 38% increase in emissions from 2022, with yearly emissions increasing since 2015. Industrial emissions increased 97% and transportation emissions are returning to pre-pandemic levels.



This graph displays the Bellingham community's total yearly emissions (MT CO2e) from 2000-2023. Inventories were conducted for 2000, 2005, 2012, and each year from 2015-2023. The data points are labeled, and the dotted line shows the trend over time. Total emissions are increasing from 2000 to 2023. An updated methodology for natural gas usage was used for years starting in 2015. Source: GHG Emissions Report, City of Bellingham

The Bellingham Plan failed to identify any targets or milestones for reducing GHG emissions. The City’s 2018 Climate Action Plan (CAP), which is not adopted by reference into the City’s GMA Plan, did set targets. The 2023 inventory shows that the City failed to meet 2020 targets and a significant change must take place in order to meet the 2018 CAP targets.



This graph shows Bellingham's total community emissions for inventories from 2000-2023 with an orange line showing the pace of reductions needed to meet 2030 and 2050 CAP targets. The 2030 target is 57% below 2000 levels, and 2050 is 85% below 2000 levels. Bellingham would have to reduce its annual community emissions by 1.2 million MT or 72% over the next 7 years to stay on target. Source: GHG Emissions Report, City of Bellingham

Bellingham's Multimodal Transportation Plan and the Whatcom County Final Environmental Impact Statement (FEIS) show a clear increase in per capita VMT from 2023 to 2045 for Bellingham.

	Data	Data source
2023 VMT ¹³	1,693,782	FEIS
2023 Pop ¹⁴	105,529	FEIS
2023 per capita VMT	16.05	calculated
2045 VMT ¹⁵	2,302,246	FEIS
2045 Pop ¹⁶	135,829	Bellingham
2045 per capita VMT	16.95	calculated

For the Draft Plan to meet the requirements of GMA, it must show that GHG emissions and per capita vehicle miles traveled will be reduced. Based on the record, it is clear that Whatcom County should require the City to demonstrate compliance before it designates an urban growth area for the city. The

¹³ Whatcom County [Final Environmental Impact Statement \(FEIS\)](#), Table 3.2-4, p. 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](#), p. 43.

¹⁴ Whatcom County [Final Environmental Impact Statement \(FEIS\)](#), Table 3.7-3, p. 3-132.

¹⁵ Whatcom County [Final Environmental Impact Statement \(FEIS\)](#), Table 3.2-4, p. 3-22. See also 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.

¹⁶ The Bellingham Plan, LU-1, p. 20.

City's failure to comply with the GMA constitutes a substantial burden on Whatcom County's Draft Plan and helps to ensure that the Draft Plan similarly fails to reduce GHG and VMT.

Thank you for consideration of our comments.

Sincerely,

David Stalheim and Cynthia Mitchell on behalf of
Whatcom Environmental Council