



## CLIMATE LAW AND GUIDANCE: FREQUENTLY ASKED QUESTIONS (FAQ)

# Growth Management Act (GMA) amendment requires local climate action in comprehensive plans

Planning for climate change and resiliency was added as the 14th goal to the GMA in 2023, by adoption of House Bill 1181 (Chapter 228, Laws of 2023). The GMA now requires local comprehensive plans to have sub-elements with climate resilience and greenhouse gas emissions reduction:

- The Greenhouse Gas (GHG) Emission sub-element – with goals and policies to reduce GHG emissions and vehicle miles traveled – is mandatory for the state’s 11 largest counties and for cities located within those counties that have a population size greater than 6,000.
- The Resilience sub-element – with goals and policies to improve climate preparedness, response and recovery efforts – is mandatory for all fully planning counties and cities under the GMA and is encouraged for others.

This document provides answers to frequently asked questions about the new law’s requirements.

## Is there any climate element guidance available now?

The Washington State Department of Commerce, in partnership with other state agencies, tribes and local planners, developed early climate element planning guidance to help cities and counties address climate change in their comprehensive plans. A climate element can take the form of a single comprehensive plan chapter or be integrated into several chapters/elements such as housing, transportation and land use.

Commerce published early climate element planning guidance in June 2023, and a list of more than 200 model climate goals and policies that a jurisdiction could integrate into their comprehensive plan. A climate element can take the form of a single comprehensive plan chapter or be integrated into several chapters/elements such as housing, transportation and land use.

- [Link to: Climate Element Guidance \(PDF\)](#)

Commerce will revise the guidance to reflect updates to the law by December 2023. Applicable cities and counties with a 2025 comprehensive plan periodic update deadline will be the first cities required to have a climate element and should use the intermediate guidance.

## Who Must Create a Climate Element?

The Growth Management Act (GMA) has mandatory elements to include the newly added climate change and resiliency element. The climate-related changes to the GMA that are reflected in [HB 1181](#) (Chapter 228, Laws of 2023) include amendments to other mandatory elements with timeframes for applicability based on the [periodic update schedule](#). Applicable jurisdictions must update their transportation element, land use element, and add a climate element, which is comprised of a greenhouse gas emissions reduction sub-element and a resilience sub-element. The requirements apply to the counties and their cities with a population greater than 6,000 as of April 1, 2021 (per the [Office of Financial Management](#)).

The resilience sub-element is mandatory for all counties and cities fully planning under the GMA and is encouraged for all other jurisdictions (counties and cities) not listed in the table below. Commerce can provide complete training and guidance on the GMA. The following Commerce resources are available online:

- [Periodic Updates: GMA regulations](#)
- Overview of Washington [local land use planning](#)

## What is the definition of an “element”? Can climate change policies be integrated throughout a comprehensive plan or must they be in a stand-alone chapter?

A comprehensive plan “chapter” and “element” are synonymous. The new law requires that comprehensive plans include a “climate change and resiliency element” with greenhouse gas emission reduction and resilience sub-elements. The best practice would be to integrate climate change goals and policies throughout the comprehensive plan in the appropriate elements, and then organize and compile those goals and policies into a climate change and resilience element to avoid any legal confusion and depict consistency throughout the document.

## Will a comprehensive plan checklist be published?

An updated comprehensive plan [checklist](#) will be published in time for 2024 submissions but there will not be a separate checklist for the climate change and resiliency element.

## Should jurisdictions that are not “fully planning” under the GMA add a resilience sub-element?

Resilience sub-elements are not mandatory for jurisdictions that are not fully planning. However, Commerce encourages this if at all practicable.

## Where is a compact list of (sample) climate measures?

A list of over 200 climate measures are linked to the June 2023 guidance. Refer to the “Menu of Measures” for sample goals and policies.

- [June 2023 – Early Climate Element Guidance \(PDF\)](#)
- [Menu of Measures](#)

## How do jurisdictions acquire information to develop a climate element?

Commerce published early climate element planning guidance in June 2023, and a list of more than 200 model climate goals and policies (Menu of Measures) that jurisdictions could integrate into their comprehensive plan. A climate element can take the form of a single comprehensive plan chapter or be integrated into several chapters/elements such as housing, transportation, and land use.

The original guidance document was intended to be final as of June 2023. However, with the changes to statute in 2023, Commerce will need to revise the new guidance to reflect these updates to the law. We expect to publish intermediate guidance by December 2023. Applicable cities and counties with a 2025 comprehensive plan periodic update deadline will be the first cities required to have a climate element and should use the intermediate guidance.

## Is resilience being emphasized over mitigation (GHG emission reduction)?

The state's guidance for development of a climate element includes emphasis on both resilience and GHG emission reduction.

## Will additional guidance be released on VMT reduction measures in 2023 (For example: tools and methods for VMT calculations)?

Yes, Commerce and Washington State Department of Transportation (WSDOT) will be working together on transportation planning issues. WSDOT has informed us that they will continue to publish and augment county level VMT data with city level data being developed for the first time.

- County VMT data has been and continues to be available: [WSDOT VMT Transportation Data](#)
- City level data is being developed for the first time. It should be published by the end of this calendar year for 2022. Future updates to city level data should be published each November.

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

Commerce's decision to approve could be appealed to the Growth Management Hearings Board. Refer to Section 6 of HB 1181 (2023) for full details.

## What are the significant agency (Commerce) actions and when do they take effect?

Commerce may approve GHG emission reduction sub-elements that are optionally submitted by counties and cities prior to completing comprehensive plans and periodic updates. Commerce will specify processes and requirements for submission of these sub-elements in the next Washington Administrative Code (WAC) updates.

## What about funding for this work?

Commerce will be providing approximately \$30 million in grants each biennium (as appropriated) to support development of climate elements. Information about climate grant programs is available on our [Climate Program website](#). Check [Growth Management Services](#) grant page for other opportunities.

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The Commerce Climate Program may update this FAQ periodically to address new questions.

Visit [www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/climate-change/](http://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/climate-change/) for more information about the new law and planning guidance.

**More questions?** Contact the Commerce Climate Program at 360-725-3114 or [GMSClimate@commerce.wa.gov](mailto:GMSClimate@commerce.wa.gov).