



City of Burlington Climate Policy Recommendations Memo

Date: June 11, 2025

To: Brad Johnson, Community Development Director, City of Burlington

From: Rachel Chen, Planner, and Katie Cote, AICP, Planning Manager

Subject: Climate Element Policy Recommendations

INTRODUCTION

The City of Burlington is updating its Comprehensive Plan as part of the periodic update process, with adoption expected in late 2025. As part of a larger consultant team, BHC was tasked with completing an audit of the city’s existing plans, policies, and development regulations for policies that may address the requirements of Climate Elements under the Growth Management Act (GMA).

This memo provides high-level policy recommendations aimed at further reducing Burlington’s greenhouse gas (GHG) emissions and enhancing community resilience. It also addresses the policy gaps identified in the Climate Policy Audit memo, dated March 25, 2025, and prioritizes required updates to the existing Comprehensive Plan elements to comply with [HB 1181](#) (2023), the state’s climate planning law, as adopted by [RCW 36.70A.070\(9\)](#).

This memo contains a brief overview of legislative changes to the GMA and to comprehensive plan requirements under HB 1181 (2023). It highlights policy recommendations for the other elements of the comprehensive plan (land use, transportation, and capital facilities – entitled “Public Facilities and Services” in Burlington’s Comprehensive Plan).

COMPREHENSIVE PLAN POLICY RECOMMENDATIONS

Burlington’s existing Comprehensive Plan (2023) includes numerous goals and policies that meet the requirements of HB 1181 and help the city reduce its GHG emissions and increase its community resilience to climate-exacerbated hazards. A summary of these supportive goals and policies can be found in the Climate Policy Audit memo that was previously provided by BHC.

Climate planning requirements under the GMA ensure that comprehensive plans help cities “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.”¹

To better meet these requirements and build upon the city’s existing work to reduce emissions and increase resilience, there are numerous policy areas the city should consider addressing in the new Climate Element, and throughout other elements of the City’s Comprehensive Plan, as outlined by element below.

The policy recommendations outlined below include several policies from the Washington State Department of Commerce (Commerce) [Climate Policy Explorer](#) (CPE) which can be further tailored to suit the City of Burlington’s resilience goals, as needed. A comprehensive list of policy recommendations may also be referenced in [Appendix A](#).

Climate Element

The City is adapting the current Natural Resources Element to become the new Climate Element. As such, while the Natural Resources Element includes numerous goals and policies that would help the city increase its resilience to climate impacts and reduce its GHG emissions, there are several policy gaps the Climate Element would need to address, as outlined in this section.

Throughout other elements of the City’s Comprehensive Plan, there are many policies that may be better suited for the Climate Element, as noted in the Climate Policy Audit memo and appendix. The Climate Policy Audit also includes proposed redlines for relevant climate-related policies in the Natural Resources Element that will be adopted for the Climate Element. Where noted, there are a few policy recommendations included below to ensure consistency with the climate resilience or greenhouse gas reduction related policies found in the Skagit County Countywide Planning Policies.

Policy Recommendations

Based on the Climate Policy Audit and the policy gaps in the City’s Comprehensive Plan, new policies should be considered for the Climate Element, as organized by sub-element and climate sector below. Policy recommendations from Commerce’s Climate Policy Explorer are indicated by a **bold** policy number; any recommended edits to these Commerce policies are shown in *italics* or further explained as needed. Where policy numbers are provided below, these come directly from Commerce’s Climate Policy Explorer. We would expect the city to renumber these when incorporating them into the Comprehensive Plan.

There are numerous policies recommended below. To help the city prioritize, policies that are required for consistency with climate planning requirements are listed in regular black text, while policies that are optional, but recommended to increase the city’s resilience are listed at the end of

¹ HB 1181, 68th Legislature, 2023 Reg. Sess., (WA 2023). <https://lawfilesexternal.leg.wa.gov/biennium/2023-24/Pdf/Bills/Session%20Laws/House/1181-S2.SL.pdf?q=20230615091639>.

each sub-topic in **purple text**. A comprehensive list of policy recommendations organized by Comprehensive Plan element is provided in [Appendix A](#).

Climate Resilience Sub-Element

At minimum, the Climate Resilience Sub-Element must:

- Address natural hazards created or aggravated by climate change, including sea level rise, landslides, flooding, drought, heat, smoke, wildfire, and other impacts caused by changes to temperature and precipitation patterns.
- Identify, protect, and enhance natural areas and areas of vital habitat for safe species migration to foster climate resilience.
- 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.²

To address policy gaps and ensure the Climate Resilience Sub-Element is consistent with state requirements, we recommend the city add the following policies.

COMMUNITY PARTICIPATION AND EQUITABLE OUTREACH

- **Goal AA:** Ensure environmental justice³ by providing all residents *with* an equitable opportunity to learn about climate impacts, influence policy decisions, and take actions to enhance community resilience.
- **Policy AA.01:** Create and implement culturally contextualized outreach and education initiatives and materials that will inform the community about near-term and longer-term climate change threats and build resilience.⁴
- **Policy AA.02/AA.03:** Build and support partnerships with community-based organizations *and climate justice coalitions* with the capacity and relationships to convene diverse coalitions of *community members, facilitate frontline community learning*⁵, and to educate and empower *people* to implement climate resilience actions.
- **Policy AA.04:** Engage overburdened communities⁶ in participatory budgeting efforts to support equitable distribution of funding that helps reduce local emissions and build resilience.

² HB 1181, 68th Legislature, 2023 Reg. Sess., (WA 2023). <https://lawfilesexternal.wa.gov/biennium/2023-24/Pdf/Bills/Session%20Laws/House/1181-S2.SL.pdf?q=20230615091639>.

³ The American Public Health Association defines environmental justice as the idea that all people and communities have the right to live and thrive in safe, healthy environments with equal environmental protections and meaningful involvement in these actions (see <https://www.apha.org/topics-and-issues/environmental-health/environmental-justice> for more information).

⁴ This could include ensuring outreach materials and programs are available in different languages (e.g., Spanish) and formats (e.g., accessible for people with hearing, vision, or mobility differences) based on the demographics and needs of Burlington community members.

⁵ Frontline community learning focuses on empowering and educating frontline communities, which are communities that are disproportionately impacted by climate change. Frontline communities are often hurt first and worst by climate change.

⁶ Overburdened communities are those that experience a disproportionate share of environmental burdens or lack environmental or public health benefits (e.g., communities located near environmental hazards stemming from industrial pollution).

- **Policy AA.05:** Provide emissions-reduction educational workshops, activities, and engagement opportunities, especially those that prioritize equity and underrepresented communities.

HEALTH AND WELLBEING

- **Goal T:** Protect community health and well-being from the impacts of climate-exacerbated hazards – prioritizing focus on overburdened communities – and ensure that the most vulnerable residents do not bear disproportionate health impacts. (Also addresses Skagit County CPP Policy 14.4).
- **Policy T.06:** Develop and maintain a program to distribute cooling units and install heat pumps, prioritizing households with residents (e.g., low-income seniors) most vulnerable to extreme temperature events. (Also addresses Skagit County CPP Policy 14.4).
- **Policy T.08:** Develop and implement an urban heat resilience strategy that includes land use, urban designs, urban greening, and waste heat reduction actions.
- **Policy T.10:** Promote the use of health impact assessments and other tools to address the potential impacts of health, equity, and climate change on vulnerable communities.⁷ (Also addresses Skagit County CPP Policy 14.4).

BUILDINGS AND ENERGY

- **Goal P:** Ensure that buildings are designed and built sustainably to reduce environmental impacts and remain resilient to extreme weather and other hazards worsened by climate change.
- **Policy P.02:** Prioritize the use of lower-carbon building materials in new construction and building retrofits to reduce embodied carbon.
- **Policy:** Consider enrolling in PSE’s Green Power or Green Direct Program to power municipal operations and support and encourage community participation in these programs or other demand-response programs through education and awareness campaigns.

STORMWATER MANAGEMENT AND LOW-IMPACT DEVELOPMENT

- **Goal Y:** Protect and preserve water quality and quantity from drought, extreme heat, and other hazards exacerbated by climate change.
- **Policy P.01:** Require the design and construction of commercial and residential buildings, *public drainage facilities*, and their surrounding sites to reduce and treat stormwater runoff and pollution. (Edits in italics are included to address Skagit County CPP Policy 12.14).
- **Policy Y.03:** Require the use of green infrastructure and low-impact development to *decrease the amount of pavement, other impervious surfaces, and the urban heat island effect; address increased storm intensities; and capture, filter, store, and reuse stormwater runoff.*
- **Policy Y.09:** Develop and maintain a fund to build green infrastructure projects that help capture, filter, store, and reuse stormwater runoff.
- **Policy Y.04:** Manage water resources sustainably *to ensure the availability of water* in the face of climate change through smart irrigation, stormwater management, preventative

⁷ Vulnerable communities are those that are at a greater risk of experiencing harm from natural hazards due to social, economic, or environmental factors.

maintenance, water conservation and wastewater reuse, plant selection, and landscape management. (Edits in italics are included to address Skagit County CPP Goal 10).

- **Policy Y.07:** Construct and maintain new water-storage systems (e.g., large cisterns, water towers, and reservoirs) to provide back-up water supplies during droughts and support climate resilience.
- **Policy Y.05:** Expand municipal reclaimed water systems and allow onsite non-potable water systems to reduce water demand in private-sector commercial and residential buildings.

FLOOD PROTECTION

- **Goal L:** Ensure the protection and restoration of streams, riparian zones, estuaries, wetlands, and floodplains to achieve healthy watersheds that are resilient to climate change.
- **Policy A.03:** Establish regulations that require the location of new lots and structures outside of sea-level rise hazard areas. (This policy was adapted from Commerce’s **Policy A.03** but edited to address floodplain areas (it addresses sea level rise hazards as written)).
- **Policy A.14:** Consider climate change, including sea-level rise, extreme precipitation, increased winter streamflow, and other impacts, in floodplain management planning.
- **Policy L.01:** Implement actions identified in restoration and salmon recovery plans to improve the climate resilience of streams and watersheds.
- Policy (based on Commerce CPE **Policy L.05**): Restore floodplains and connectivity within the Gages Slough watershed to reduce flooding and maximize the ecological and climate resilience of riparian ecosystems.
- **Policy L.04:** Protect and restore riparian vegetation to reduce erosion, provide shade, and support other functions that improve the climate resilience of *the Skagit River*.
- Policy: Work collaboratively with surrounding jurisdictions and Tribes to ensure watershed protection, implement flood hazard reduction programs, and provide ongoing public education regarding flooding and flood hazard reduction efforts. (This policy is included to address Skagit County CPP Policies 10.12, 10.13, and 10.15).

ECOSYSTEMS AND CRITICAL AREAS

Similar policy recommendations regarding tree cover can be found under the [Parks and Recreation Element](#) sub-section.

GOAL 1

- **Goal AB:** Increase tree canopy cover to boost carbon sequestration, reduce heat islands, and improve air quality, prioritizing overburdened communities.
- Policy: Increase tree canopy cover and other landscaping, green infrastructure, or low-impact development techniques such as raised planters, street trees, bioswales, or other landscaped planting strips or curb bulbs that help reduce and treat stormwater runoff and pollution, boost carbon sequestration, reduce heat islands, and improve air quality, prioritizing overburdened communities.
- **Policy AB.04:** Maximize tree canopy coverage in surface parking lots.
- **Policy AB.03:** Improve and expand urban forest management to maximize or conserve carbon storage.

- **Policy AE.03:** Manage tree canopy and forests (including parks, greenbelts, and urban forests) to decrease climate-exacerbated risks from severe wildfires, protect residents, and improve ecosystem health and habitat.
- **Policy AE.08:** Prioritize urban forestry planting resources and funding for frontline communities that are hurt first and worst by climate change.

GOAL 2

- **Goal (Policy V.10):** Restore and maintain critical areas and open space areas to maximize the climate resilience benefits they provide.
- **Policy U.02:** Identify opportunities to expand habitat protection and improve habitat quality and connectivity to foster climate resilience using conservation area designations, buffers, and open space corridors.
- **Policy U.10:** Ensure no net loss of ecosystem composition, structure, and functions, especially in Priority Habitats, Critical Areas, and *Special Management Zones*, and strive for net ecological gain to enhance climate resilience.
- **Policy V.06 and V.10:** Maintain and update a critical areas ordinance that incorporates climate change considerations *to maximize the climate resilience benefits they provide.*
- **Policy AE.06:** Ensure that tree species selection and planting guidance are updated to be resilient to climate change.

WILDFIRE SMOKE PREPAREDNESS

- **Goal:** Ensure the effects of wildfire smoke on community members is minimized, where feasible.
- **Policy T.05:** Develop and implement notification alerts within the community to reduce the risk of exposure to wildfire smoke and particulate matter.
- **Policy T.04:** Prioritize at-risk community members for actions that mitigate wildfire smoke, including providing personal protective equipment and filter fans or incentivizing infrastructure updates (e.g., HVAC updates and MERV 13 filters for air intake) for facilities that serve high-risk populations.
- **Policy T.07:** Develop and implement a wildfire smoke resilience strategy in partnership with local residents, emergency management officials, regional clean air agency officials, and other stakeholders.

EMERGENCY MANAGEMENT AND PREPAREDNESS

- **Goal M:** Develop and maintain local government staff members' technical expertise and skills related to climate change and environmental justice so as to improve communitywide policy implementation, equity, and resilience.
- **Policy M.01:** Create evacuation plans and outreach materials *in all applicable languages* to help residents plan and practice actions that make evacuation quicker and safer. (*Note: This one heavily relates to Policy AA.01 recommended above in Community Participation and Equitable Outreach; additional policy edits recommended in italics.*)
- **Policy S.07:** Develop resilience hubs – community-serving facilities that are designed to support residents, coordinate communication, distribute resources, and reduce carbon pollution while enhancing quality of life.
- **Policy T.03:** *Work with other jurisdictions and organizations to address the social and mental health needs of displaced populations following disasters.*

- **Policy R.01 and S.09:** Ensure that the *City's Hazard Mitigation Plan is updated to integrate a climate impacts risk assessment and* respond to the impacts of climate change and identifies roles and responsibilities to support a sustainable economic recovery after a disaster.
- **Policy S.08:** Factor climate impacts into the planning of operations and coordination of preparedness, response, and recovery activities among first responders and partners, including public health, law enforcement, fire, school, and emergency medical services (EMS) personnel.
- **Policy S.01:** Map transportation infrastructure that is vulnerable to repeated floods, landslides, and other natural hazards, and designate alternative travel routes for critical transportation corridors when roads must be closed.
- **Policy X.01:** Develop and implement a strategy to expedite management of debris (e.g., downed tree limbs and buildings blocking roads and streams) after a disaster incident to reduce the risks of subsequent fire, flood, injury, and disease vectors.

CULTURAL RESOURCES AND PRACTICES

The following policy recommendations would not only help the city increase the resilience of cultural and historic resources to climate impacts, but would also **support Skagit County CPP Goal 13**, which is currently not addressed in the City's Comprehensive Plan. Alternatively, policies could be drafted in the Land Use Element to address Skagit County CPP Goal 13.

- **Goal Q:** Ensure that cultural resources and practices – including significant historic sites and culturally important traditional foods and natural resources – are resilient to the impacts of extreme weather and other natural hazards worsened by climate change.
- **Policy Q.03:** Establish and maintain government-to-government relations with Native American tribes for the preservation of archaeological sites and traditional cultural properties that are vulnerable to climate impacts.

Greenhouse Gas Emissions (GHG) Reduction Sub-Element

At minimum, the GHG Emissions Reduction Sub-Element must:

- Result in reductions in overall greenhouse gas emissions generated by transportation and land use within the jurisdiction without increasing emissions elsewhere in the state.
- Result in reductions in per capita vehicle miles traveled within the jurisdiction but without increasing greenhouse gas emissions elsewhere in the state.
- Prioritize reductions that benefit overburdened communities to maximize the co-benefits of reduced air pollution and environmental justice.⁸

To address policy gaps and ensure the GHG Emissions Reduction Sub-Element is consistent with state requirements, we recommend the city add the following policies.

RENEWABLE ENERGY AND ENERGY USE

GOAL 1

- **Goal E:** Ensure that buildings use renewable energy, conservation, and efficiency technologies and practices to reduce greenhouse gas emissions.
- **Policy E.01:** Require additional net-zero greenhouse gas emission features of all new residential and commercial structures.
- **Policy E.02:** Maximize renewable energy sources for the supply of electricity and heat to new and existing buildings.
- **Policy E.03:** Retrofit buildings for energy efficiency, *prioritizing community-serving spaces and public facilities*.
- **Policy E.04:** Develop local microgrid solar and battery storage facilities in low-impact sites.
- **Policy E.05:** Phase out natural gas use in existing publicly owned facilities by **[insert target date]** and retrofit with electric heat pumps.
- **Policy E.06:** Require all publicly owned buildings to be powered completely by renewable energy by **[insert target date]**.
- **Policy E.07:** Encourage or incentivize green building certification to improve energy and environmental performance.
- **Policy R.08:** Facilitate the development of community-owned, small-scale renewable energy generation projects.
- **Policy T.14:** Provide overburdened communities with subsidies to offset potential cost increases associated with conversion to non-fossil-fuel energy sources.

GOAL 2

- **Goal F:** Prioritize the adaptive reuse of buildings, recognizing the emission-reduction benefits of retaining existing buildings.
- **Policy F.01:** Preserve and reuse existing buildings, *where feasible*.
- **Policy F.02:** Prioritize the preservation and weatherization of housing in overburdened communities, particularly at higher densities, to reduce emissions and increase resilience.

⁸ HB 1181, 68th Legislature, 2023 Reg. Sess., (WA 2023). <https://lawfilesexternal.leg.wa.gov/biennium/2023-24/Pdf/Bills/Session%20Laws/House/1181-S2.SL.pdf?q=20230615091639>.

WASTEWATER TREATMENT

- Goal: Reduce emissions from the wastewater treatment plant, as new technologies become available.
- **Policy X.08:** Develop a local pollution surcharge for large producers of air pollutants, wastewater, and solid waste. *(Note: The surcharge could be used as a subsidy to help low-income households convert to solar or heat pumps.)*
- Policy: Implement strategies to reduce the total volume of wastewater needing treatment as new technology is developed. *(Note: Could align with water conservation initiatives.)*
- Policy: Consider implementing technologies to decrease nitrous oxide emissions from wastewater treatment plant effluent as new technology is developed.

SOLID WASTE MANAGEMENT

The following policy recommendations would not only help the city reduce its GHG emissions, but would also **support Skagit County CPP Policy 5.13**, which is currently not addressed in the City's Comprehensive Plan.

GOAL 1

- **Goal D:** Develop targeted campaigns for recycling materials with the highest GHG reduction impact (e.g., paper, metal, food waste).
- **Policy D.01:** Incentivize the recycling of construction and demolition debris.

GOAL 2

- **Goal X:** Ensure that the community is able to reduce, reuse, and recycle waste materials sustainably.
- **Policy D.02:** Create and sustain a business technical assistance program to increase recycling and reduce waste.
- **Policy D.03:** Use recycled materials in the construction of transportation and other infrastructure facilities.

Land Use Element

Under HB 1181, The Land Use Element has been amended to also require:

- The designation of the proposed or general location of green spaces and urban and community forests within the urban growth area;
- Special consideration of “achieving environmental justice in its goals and policies, including efforts to avoid creating or worsening environmental health disparities;”
- The use of planning approaches that “reduce per capita vehicle miles traveled within the jurisdiction, but without increasing greenhouse gas emissions elsewhere in the state;”
- The use of land use planning tools to “reduce and mitigate the risk to lives and property posed by wildfires,”⁹ such as the adoption of portions or all of the wildland urban interface (WUI) code or developing building and maintenance standards consistent with the Firewise USA (or similar) program.

⁹ [RCW 36.70a.070\(1\)](#)

To address the new policy-related requirements and enhance the city’s existing Land Use policies related to GHG emissions reduction and community resilience, **suggested edits to strengthen existing policies in the Land Use Element can be found in the full Climate Policy Audit**. Other edits to the Land Use Element may be needed to ensure compliance with the requirements noted above (e.g., to address the first bullet point above in particular).

Policy Recommendations

To address climate planning requirements and further enhance the city’s Land Use policies related to GHG emission reduction and community resilience, we recommend the following policies are added to the Land Use Element or, if preferred, included in the Climate Resilience Sub-Element.

Policy recommendations from Commerce’s Climate Policy Explorer are indicated by a bolded policy number; any recommended edits to these Commerce policies are shown in italics or further explained as needed. A comprehensive list of policy recommendations may also be referenced in [Appendix A](#).

ZONING AND DEVELOPMENT

GOAL 1

- **Goal V:** Establish land use patterns that increase the resilience of the built environment, ecosystems, and communities to climate change.
- **Policy:** Prior to altering UGAs, consider the potential impacts on climate resilience, greenhouse gas emissions, and vehicle miles traveled associated with each alternative. (This policy was drafted to address Skagit County CPP Policy 1.11.)
- **Policy T.12:** Prioritize the development of anti-displacement programs in overburdened communities when increasing densities.
- **Policy C.06:** Prioritize infill development through zoning and permitting processes. (*Note: While the city has many policies related to infill development, it may be useful to have an overarching goal to prioritize infill development.*)
- **Policy:** Ensure commercial areas are aggregated in cluster form, pedestrian oriented, and are designed to accommodate public transit, where appropriate.
- **Policy V.12:** Prohibit the expansion of polluting industries in overburdened communities via local zoning and development regulations.

GOAL 2

- **Goal K:** Increase housing diversity and supply within urban growth areas to reduce greenhouse gas emissions and support environmental justice.
 - This goal may fit better in the Housing Element, if preferred.
- **Policy K.06:** Develop and implement inclusionary zoning to support greater income diversity in housing types.

DEVELOPMENT REGULATIONS AND STANDARDS

GOAL 1

- **Goal A:** Ensure that development and redevelopment projects are resilient to the impacts of climate change.

- **Policy A.05:** Acquire properties or easements on properties that are vulnerable to climate-exacerbated hazards and are or will become unsuitable for development.
 - This policy was also highlighted in the full Climate Policy Audit, for potential edits to Land Use Policies 2.4.3, 2.4.3.4 and Natural Resources Policy 4.5.3.3. It could be included in the plan through the recommended edits in the full Climate Policy Audit, or this new policy could be included in the plan on its own.
- **Policy V.05:** Direct new development into areas where exposure to climate hazards is low.
 - This policy may be combined or grouped with Natural Resources Policy 4.5.3.2.
- **Policy A.01:** Establish development regulations that incorporate best practices for reducing the risk of wildfire, extreme heat, flooding, and other climate-exacerbated hazards.
- **Policy P.06:** Develop or modify design standards to integrate exterior building features that reduce the impacts of climate change and increase resilience.
- **Policy U.05:** Choose native drought- and pest-resistant trees, shrubs, and grasses in restoration efforts to support climate resilience.

GOAL 2

- **Goal G:** Maximize *the* solar access of site design, where practicable, for new solar-ready residential and commercial buildings.
- **Policy G.03:** Require solar panels on buildings with large rooftops, as well as within or over parking areas.

Transportation Element

With the passing of HB 1181, The Transportation Element has been amended to also require:

- Adopted multimodal level of service (LOS) standards for state-owned transportation facilities, locally owned arterials, and locally and regionally operated transit routes that serve urban areas;
- An inventory, adopted LOS, and the identification of planned improvements for active transportation facilities to encourage enhanced community access and promote healthy lifestyles;
- A forecast of multimodal transportation demand and needs for a minimum of 10 years, including land use assumptions used in estimating travel, to equitably meet current and future needs;
- The identification of specific actions to bring transportation facilities and services to established multimodal LOS;
- An ADA transition plan for transportation facilities to identify and address network deficiencies;
- A discussion of how additional funds will be raised or land use assumptions reassessed if probably funding falls short to ensure LOS standards will be met;
- Consistency with environmental justice.

To address some of these new requirements and enhance the city's existing Transportation policies related to GHG emissions reduction and community resilience, **suggested edits to strengthen existing policies in the Transportation Element can be found in the full Climate**

Policy Audit. In addition, the following policy recommendations could be considered as part of the Comprehensive Plan update.

Policy Recommendations

To address climate planning requirements and further enhance the city's Transportation policies related to GHG emission reduction and community resilience, we recommend the following policies be added to the Transportation Element or, if preferred, included in the Greenhouse Gas Emissions Reduction Sub-Element.

Policy recommendations from Commerce's Climate Policy Explorer are indicated by a bolded policy number; any recommended edits to these Commerce policies are further explained as needed. A comprehensive list of policy recommendations may also be referenced in [Appendix A](#).

MULTIMODAL TRANSPORTATION

- **Goal I:** Reduce vehicle miles traveled to achieve greenhouse gas reduction goals.
- **Policy H.03:** Implement multimodal transportation planning to reduce single-occupancy vehicle dependence and greenhouse gas emissions.
- **Policy I.01:** Implement travel demand management (TDM) programs and strategies.
- **Policy I.04:** Increase multimodal capacity in coordination with the location of higher-density housing and commercial centers.
- **Policy I.24:** Prioritize permitting for transit-oriented development (TOD) proposals.
- **Policy:** Work with Skagit Transit to expand public transportation options in the city and improve the speed, frequency, coverage, and reliability of public transit. (This policy was drafted to address Skagit County CPP Policy 14.1).
- **Policy H.01:** Prioritize and promote public transit expansion and use through coordination of land use and transportation planning.
- **Policy AC.01:** Eliminate parking minimum requirements and establish parking maximums. OR **Policy AC.02:** Reduce parking requirements where there are multimodal options available.
- **Policy:** Site, construct, and maintain new transportation facilities and transportation system improvements to minimize noise levels, per capita VMT, and greenhouse gas emissions. (This policy was drafted to address Skagit County CPP Policies 3.12 and 14.1.)

ACTIVE TRANSPORTATION

- **Goal:** Encourage and improve the safety of active transportation methods to improve public health and reduce greenhouse gas emissions.
- **Policy I.14:** Create a safe, well-connected, and attractive bicycle and pedestrian transportation network to encourage active transportation.
- **Policy W.02:** Improve street connectivity and walkability, including sidewalks and street crossings, to serve as potential evacuation routes.
- **Policy I.16:** Prioritize, develop, and maintain mobility hubs in transportation-efficient locations — especially in overburdened communities experiencing a scarcity of transportation alternatives.

ELECTRIC VEHICLES

Policies related to municipal vehicles can be found in the Public Facilities and Services Element below but could be included in the Transportation Element if preferred.

- **Goal AD:** Expand electric vehicle infrastructure *throughout the city (e.g., charging stations and dedicated lanes for electric cars and buses)*.
- **Policy AD.01:** Require electric vehicle charging infrastructure in all new and retrofitted buildings.

Public Facilities and Services Element

The Capital Facilities Element has been amended to also require an inventory of existing green infrastructure owned by public entities (in addition to the existing inventory of capital facilities that is required as part of this element). This could include city parks and open space, wetlands used for stormwater detention, tree canopy, and any other natural or built green stormwater infrastructure assets owned by the city, such as bioswales, detention ponds, or green roofs.

Policy Recommendations

To address climate planning requirements and improve the resilience of and reduce emissions from the city's public facilities, the following policies should be considered for the Public Facilities and Services Element or, if preferred, included in the Climate Resilience Sub-Element.

Policy recommendations from Commerce's Climate Policy Explorer are indicated by a bolded policy number; any recommended edits to these Commerce policies are further explained as needed. A comprehensive list of policy recommendations may also be referenced in [Appendix A](#).

INFRASTRUCTURE AND PUBLIC FACILITY RESILIENCE

GOAL 1

- **Goal O:** Ensure that energy infrastructure – including generation and transmission – is able to accommodate renewable energy opportunities and to withstand and recover quickly from the impacts of extreme weather and other natural hazards worsened by climate change.
- **Policy O.02:** Install distributed renewable energy generation and battery infrastructure at public facilities to store renewable energy generated on site and provide emergency power that ensures continuity of operations.
- **Policy O.04:** Work with energy utilities to improve the safety and reliability of infrastructure vulnerable to climate change.

GOAL 2

- Goal: Ensure capital facilities are resilient to natural and climate-exacerbated hazards and can accommodate projected growth.
- **Policy A.12:** Consider future climate conditions during the siting and design of capital facilities, including changes to temperature, rainfall, and sea level, to ensure they function as intended over their planned life cycle.
- **Policy K.07:** Plan for and invest in capital facilities to accommodate infill development.
 - The city's existing Comprehensive Plan has many policies related to infill development, but no explicit policy to develop capital facilities that can accommodate that type of growth.

CITY FACILITIES AND PROCUREMENT

GOAL 1

- Goal: Increase the energy efficiency of the city's public facilities to reduce GHG emissions.
 - (Note: this goal could also be combined with existing Goal 6.4.2 to acknowledge the climate benefits of the associated policies, such as Policy 6.4.2.2 (Ensure new public facilities and capital investments incorporate efficiency measures that reduce water and energy consumption and gradually upgrade existing facilities and infrastructure. Consider the use of energy efficient lighting, HVAC systems, solar power, and electric vehicles.) and 6.4.2.3 (Design public facilities and infrastructure with a long term view to reduce future repair, maintenance, and servicing costs, and to protect public investments from natural disasters and other hazards).
- Policy: Pursue energy efficient upgrades to the city's public facilities and ensure compliance with the Washington Clean Building Performance Standard (CBPS).
- Policy: Explore funding sources to support energy efficiency upgrades of the city's public facilities, such as incentive or rebate programs offered by Cascade Natural Gas and Puget Sound Energy and similar programs.

GOAL 2

- **Goal H:** Convert public fleets to zero-emission vehicles and develop supporting infrastructure and programs to decrease GHG emissions.
- Policy: Replace 80% of municipal vehicles with electric vehicles supported by sufficient charging infrastructure by 2035.
- Policy: Pursue funding to support the electrification of the city's fleet, such as by considering Puget Sound Energy's Up and Go Electric for Fleet Program and similar incentive or rebate programs to support the transition to electric vehicles and development of charging infrastructure.

GOAL 5

- Goal: Update the city's procurement policies and code provisions to encourage the procurement of materials that reduce greenhouse gas emissions and/or increase community resilience.
- Policy: Prioritize sustainable materials in the procurement of building materials for public works projects, which may include materials that are locally sourced, energy-efficient, recyclable, have a low environmental impact, as well as possess Environmental Product Declarations (EPDs) and Health Product Declarations (HPDs).
- Policy: Incorporate sustainable practices into the procurement of materials and services for capital improvement projects including the use of energy-efficient and low-emission building materials.
- Policy: Develop procurement policies that prioritize materials and services that conserve resources, holistically evaluate benefits and impacts, consider the life cycle of the product, ensure health and safety, and promote innovation.

Economic Development Element

HB 1181 does not mandate additional requirements for economic development elements, but recommendations are provided below to ensure consistency between the Climate Element and the Economic Development Element.

Policy Recommendations

The following policies from the Climate Policy Explorer should be considered for the Economic Development Element or included in the Climate Resilience Sub-Element if preferred. A comprehensive list of policy recommendations may also be referenced in [Appendix A](#).

- **Goal R:** Ensure that the local economy is resilient to climate disruptions and fosters business opportunities associated with climate mitigation and adaptation.
- **Policy R.02:** Support local businesses' efforts to bolster climate preparedness and continuity of operations.
- **Policy B.02:** Create and sustain a business technical assistance program to increase recycling and reduce waste.

Parks and Recreation Element

The Parks and Recreation Element has been amended to also require an evaluation of tree canopy coverage within the urban growth area.

Policy Recommendations

In addition to an evaluation of the city's tree canopy, we recommend the following policies be added to the Parks and Recreation Element or included in the Climate Resilience Sub-Element if preferred. Similar policy recommendations can be found under the [Ecosystems and Critical Areas](#) sub-section. A comprehensive list of policy recommendations may also be referenced in [Appendix A](#).

- **Goal:** Enhance the city's existing parks, trails, and tree canopy to improve public health and wellbeing, increase carbon sequestration, and foster greater resilience to climate hazards.
- **Policy W.05:** Enhance the resilience of parks and recreational trails by assessing and addressing climate hazards and impacts.
- **Policy:** Retain the city's existing tree canopy and equitably expand the tree canopy, prioritizing areas lacking tree cover and in multifamily housing developments.
- **Policy A.13:** Identify and plan for climate impacts to valued community assets such as parks and recreation facilities, including relocation or replacement.
- **Policy Y.01:** Utilize water conservation methods and technologies in development of irrigation infrastructure within parks and recreation areas so as to foster climate resilience.
- **Policy T.09:** Ensure that all community members have equitable access to green space within a half mile.

DEVELOPMENT REGULATIONS RECOMMENDATIONS

To aid in the implementation of the numerous goals and policies recommended above, the following sections outline various recommended updates to the city's development regulations to align them with the city's climate goals. The recommendations are organized by title of the Burlington Municipal Code (BMC).

Title 14 – Environmental Regulations

Environmental regulations in BMC Title 14 include numerous provisions intended to reduce flooding risks and increase low-impact development practices. To take these measures further, we recommend the city incorporate the following recommendations.

- Under [BMC 14.05.090.G](#), encourage or incentivize the development of rain gardens on private property. Consider adopting The Rain Garden Handbook for Western Washington, which provides guidance for the design, installation, and maintenance of rain gardens.¹⁰
- Under [BMC 14.05.090.G](#), consider listing low-impact development techniques as examples such as rain gardens, rainwater harvesting, green roofs, native vegetation, restoring the natural floodplain, establishing pervious cover minimums and incentives, tree canopy coverage requirements, water efficient or drought tolerant landscaping, or purchase of development rights.
- Under [BMC 14.05.090.G](#) develop incentives or rebates to encourage low impact development, such as those found in the Department of Commerce's "Incentivizing Low-Impact Development" guidance document.¹¹
- Under [BMC 14.05.090](#), require additional storm retention ponds for new development or place more stringent limitations on impervious surfaces to promote water infiltration into the ground and minimize stormwater runoff.
- Under [BMC 14.15.070](#), additional incentives can be included to encourage the protection of critical areas and reduce the impacts of flooding and other natural hazards, such as additional density or flexible development standards and lot sizes.
- Under [BMC 14.15.380.A](#), consider requiring native plants.
- Under [BMC 14.15.380.C.4](#), consider specifying tree removal for trees that may be blown over in a storm.
- Under [BMC 14.15.400.B.7](#), additional floodproofing requirements may be outlined for structures in floodplains such as flood vents, waterproofed basements, or elevating utilities 1-3ft above the BFE.

While wildfire danger is extremely low in Burlington, anthropogenic fires (human-caused fire) may still threaten homes in the Burlington Hill Special Management Area. [BMC 15.08.130](#) (Under Title

¹⁰ Department of Ecology (2024), Rain Garden Handbook for Western Washington, <https://apps.ecology.wa.gov/publications/publications/1310027.pdf>

¹¹ Department of Commerce, Incentivizing low-impact development guidance, https://www.ezview.wa.gov/Portals/_1965/Documents/Library/BGC_Final_Guidebook_052820.pdf

15 - Buildings and Construction) requires a specific type of automatic sprinkler system for new residential buildings located within the Burlington Hill Special Management Area. The city could consider additional requirements for the management area as proposed below.

- Under [BMC 14.15.436](#), incorporate Firewise practices in the Burlington Hill Special Management Area, such as requiring residences to create defensible spaces immediately around structures. This means that residents should trim branches that overhang the home, porch, or deck, and prune branches of large trees, remove plants containing resins, oils, and waxes, or replace landscaping with native vegetation, and consider replacing crushed stone or gravel instead of flammable mulches in the immediate zone (0-5ft) around the house.
- Under [BMC 14.15.436](#), consider recommending fire-rated building materials for new structures in the management area.

Title 15 – Buildings and Construction

RENEWABLE ENERGY

Currently, solar panels are permitted in Residential, Mixed Use Residential, and Mixed Use Commercial zones as accessory uses. [BMC 15.06.045.A.4](#) permits solar panels mounted not more than 18 inches above the roof or the highest point on which they are mounted.

- Consider allowing solar panels or other forms of renewable energy like small scale wind generation in the city's Commercial and Industrial, Parks and Conservation, and Public Facilities and Transportation zones.
- Consider greater height allowances for renewable energy under [BMC 15.06.045.A.4](#). Height allowances vary greatly between comparable jurisdictions. The City of Shoreline allows up to 15 feet when camouflaged in residential zones, see [SMC Exception 20.50.050 \(3\)](#). [Seattle](#) allows solar collectors to exceed height limits by 4 feet, or 7 feet for nonconforming structures. [Marysville](#) allows solar to extend above the base height of the zone so long as they are mounted at the minimum height needed to generate usable electricity. Other jurisdictions commonly prohibit renewable energy installations from extending beyond the edge of the roof, such as in [Douglas County Code Section 18.16.350\(A\)\(4\)](#).

Additional recommendations regarding renewable energy can be found under [Title 17 – Zoning](#).

Title 16 – Land Divisions and Adjustments

While [BMC 16.40.050.A.8](#) encourages the incorporation of low-impact development features into the design and construction of all streets for new subdivisions, we recommend the following measures to help reduce localized flooding and manage stormwater, along with the recommendations outlined under Title 14 above.

- Under [BMC 16.40.050.A.8](#), consider further incentivizing low-impact development techniques through incentives or rebates found in the Department of Commerce’s “Incentivizing Low-Impact Development” guidance document.¹²
- Consider adopting The Rain Garden Handbook for Western Washington, which provides guidance for the design, installation, and maintenance of rain gardens.¹³

Title 17 – Zoning

Title 17 includes numerous provisions related to climate resilience and protecting development from climate-exacerbated hazards. To further increase the resilience of the built environment, we recommend the City could incorporate the following recommendations outlined below.

RENEWABLE ENERGY

Currently, solar panels are permitted in Residential, Mixed Use Residential, and Mixed Use Commercial zones as accessory uses. [BMC 15.06.045.A.4](#) permits solar panels mounted not more than 18 inches above the roof or the highest point on which they are mounted.

To complement provisions for renewable energy as discussed above under Title 15 – Buildings and Construction, the following recommendations could be considered.

- Setback requirements or exceptions for renewable energy generation could be added to the city’s standard setback exceptions in [BMC 17.70.080](#).
- Provisions for heat pumps could be expanded in Mixed Use Residential and Residential Attached zones; see the City of Lynwood’s example under code section [21.44.400\(B\)](#) or the City of Seattle’s under [SMC 23.45.518\(H\)\(8\)](#).
- Site development exceptions could be extended to heat pumps or renewable energy systems, including solar panels, which could be exempt from lot coverage calculations or allowed within required setbacks, if they are set back from the property line by at least 3ft, or whatever minimum setback is preferred by the city. Other cities provide examples of this, see the City of Lynwood’s code [Section 21.44.400](#) and Seattle’s renewable code in [SMC 23.44.046](#).

LOW IMPACT DEVELOPMENT

The city requires low impact development in [BMC 17.70.135](#) for all building, development, or construction activities that result in an increase in impervious surface coverage, building coverage, or modifications to existing stormwater management features. Potential updates to this section could include a prioritization of low-impact development techniques the city prefers based on their effectiveness or design considerations or could include incentives or rebate programs to encourage the integration of low-impact development strategies as noted below. Please see additional recommendations above under Title 14 – Environmental Regulations.

¹² Department of Commerce, Incentivizing low-impact development guidance, https://www.ezview.wa.gov/Portals/_1965/Documents/Library/BGC_Final_Guidebook_052820.pdf

¹³ Department of Ecology (2024), Rain Garden Handbook for Western Washington, <https://apps.ecology.wa.gov/publications/publications/1310027.pdf>

- To complement the requirements for utilizing low impact development (LID) in the design standards found in [BMC 17.85.140](#) (Access, Parking, and Loading); [BMC 17.81.060.E](#) (Landscaping), and [BMC 17.70.135](#) (General Development Standards), among other sections, the city should consider developing incentive programs or rebates to encourage the types of LID the city prefers for maximum benefit, such as rain barrels, rain gardens, or bioretention. These code sections could also reference various guidance documents such as the Rain Garden Handbook for Western Washington and the Department of Commerce’s “Incentivizing Low-impact development” guidance document.
 - The city could consider award programs for residential or commercial applications of LID techniques and create awards for the types of LID the city wants to see more of.
 - The city could also consider financial incentives that offer reimbursement or copayment to property owners for installing LID such as cisterns, bioretention in the right of way, green roofs, rain gardens, or planting new trees. For instance, the City of Shoreline offers rebates up to \$2k for home or business owners to install a rain garden or native vegetation on their property through the Soak It Up Rebate Program.¹⁴

NATIVE PLANT REQUIREMENTS

Currently, [BMC 17.81.060](#) requires that at least 50% of all plants and trees are native to the Puget Lowland region of the Pacific Northwest and at least 25% of all trees are coniferous evergreens.

- To support this, the city could consider requiring that the remaining 50% of all plants and trees are non-competing species. Alternatively, the city could develop a list of acceptable plants for native and non-native species.
- [BMC 17.81.120](#) includes requirements to retain significant trees. These requirements could be further expanded to require the conservation of any existing significant native species on site.

ELECTRIC VEHICLES

Currently, the city permits electric vehicle charging stations as primary or accessory uses in the Mixed Use Commercial Zones, Parks and Conservation Zones, and Public Facilities and Transportation Zones.

- Consider allowing electric vehicle infrastructure in all residential zones (RA-1, RA-2, MUR-1, and MUR-2), CI-2.
- Consider priority parking for electric vehicles (might fit best under [BMC 10.12 Parking](#)). See the City of Chelan’s requirements for electric vehicle charging stations ([CMC 17.63](#)) for an example. Chelan also incentivizes the development of EV charging stations by allowing developers to include them in the calculation for minimum parking requirements.
- Encourage or incentivize community participation in [Puget Sound Energy’s \(PSE’s\) Up and Go](#) program which assists with the installation of electric vehicle charging infrastructure.

¹⁴ City of Shoreline, Soak It Up Rebate Program, <https://www.shorelinewa.gov/government/departments/public-works/surface-water-utility/get-involved/soak-it-up-rebate-program>.

- A couple examples from other jurisdictions may be helpful as reference: The City of Tacoma has a [pilot program](#) for electric vehicle charging in the right of way, and the [City of Seattle](#) has standards for charging cords in the right of way.

Title 18 – Shoreline Management Program

To further increase the city’s resilience to climate impacts, namely flooding, consider integrating the consideration of climate impacts into flood hazard reduction planning and efforts to improve water quality in the following sections:

- Edit [BMC 18.12.020.F.2](#) to read: The floodplain shall be managed in accordance with applicable federal, state, regional and local regulations, best management practices and best available science practices, the consideration of climate impacts, along with the city of Burlington floodplain management and natural hazard mitigation plan.
- Edit [BMC 18.14.020.D.3.f](#) to read: Structural flood hazard reduction measures shall be consistent with an adopted comprehensive flood hazard management plan approved by the department that evaluates cumulative impacts and the consideration of climate impacts to the watershed system.
- Edit [BMC 18.14.020.J.2.b](#) to read: The city should require reasonable setbacks; and buffers that consider potential impacts of climate change or climate-exacerbated hazards, and storm water storage basins and encourage low-impact development techniques and materials to achieve the objective of lessening negative impacts on water quality.
- Edit [BMC 18.14.020.J.3.c](#) to read: The city shall require reasonable setbacks, buffers, ~~and~~ encourage low-impact development techniques and materials, and the consideration of potential impacts of climate change or climate-exacerbated hazards to achieve the objective of lessening negative impacts on water quality.

CONCLUSION + NEXT STEPS

The policy recommendations in this memo were drafted to help the City of Burlington meet the new climate planning requirements under the GMA. To ensure they complement the community’s goals and further increase the city’s resilience, the policies should be further refined and prioritized with community feedback. Furthermore, as noted above, the city will also need to address the additional requirements for other elements of the Comprehensive Plan (e.g., Land Use, Capital Facilities, Parks and Recreation, and Transportation). This includes creating an inventory of green infrastructure, evaluating the city’s tree canopy, and adopting multimodal levels of service.

Appendix A. Comprehensive Plan Policy Recommendations

CLIMATE ELEMENT

Goal or Policy (* = Optional) <i>Numbering is proposed only.</i>	Proposed Policy Language	Sub-Element	Topic	Policy Source/Notes
Goal CR-1	Ensure environmental justice by providing all residents with an equitable opportunity to learn about climate impacts, influence policy decisions, and take actions to enhance community resilience.	Climate Resilience	Community Participation and Equitable Outreach	Adapted from Department of Commerce (Commerce) CPE Goal AA.
Policy CR-1.1	Create and implement culturally contextualized outreach and education initiatives and materials that will inform the community about near-term and longer-term climate change threats and build resilience.			Adapted from Commerce CPE Policy AA.01.
Policy CR-1.2	Build and support partnerships with community-based organizations and climate justice coalitions with the capacity and relationships to convene diverse coalitions of community members, facilitate frontline community learning, and to educate and empower people to implement climate resilience actions.			Adapted from Commerce CPE Policy AA.02 and AA.03.
Policy CR-1.3*	Engage overburdened communities in participatory budgeting efforts to support equitable distribution of funding that helps reduce local emissions and build resilience.			Commerce CPE Policy AA.04.
Policy CR-1.4*	Provide emissions-reduction educational workshops, activities, and engagement opportunities, especially those that prioritize equity and underrepresented communities.			Commerce CPE Policy AA.05.
Goal CR-2	Protect community health and well-being from the impacts of climate-exacerbated hazards – prioritizing focus on overburdened communities – and ensure that the most vulnerable residents do not bear disproportionate health impacts.	Climate Resilience	Health and Wellbeing	Commerce CPE Goal T. Also addresses Skagit County CPP Policy 14.4.

Goal or Policy (* = Optional) <i>Numbering is proposed only.</i>	Proposed Policy Language	Sub-Element	Topic	Policy Source/Notes
Policy CR-2.1	Develop and maintain a program to distribute cooling units and install heat pumps, prioritizing households with residents (e.g., low-income seniors) most vulnerable to extreme temperature events.			Commerce CPE Policy T06. Also addresses Skagit County CPP Policy 14.4.
Policy CR-2.2	Develop and implement an urban heat resilience strategy that includes land use, urban designs, urban greening, and waste heat reduction actions.			Commerce CPE Policy T.08.
Policy CR-2.3	Promote the use of health impact assessments and other tools to address the potential impacts of health, equity, and climate change on vulnerable communities.			Commerce CPE Policy T.10. Also addresses Skagit County CPP Policy 14.4.
Goal CR-3	Ensure that buildings are designed and built sustainably to reduce environmental impacts and remain resilient to extreme weather and other hazards worsened by climate change.	Climate Resilience	Buildings and Energy	Commerce CPE Goal P.
Policy CR-3.1	Prioritize the use of lower-carbon building materials in new construction and building retrofits to reduce embodied carbon.			Commerce CPE Policy P.02
Policy CR-3.2	Consider enrolling in PSE’s Green Power or Green Direct Program to power municipal operations and support and encourage community participation in these programs or other demand-response programs through education and awareness campaigns.			Drafted for the City of Burlington.
Goal CR-4	Protect and preserve water quality and quantity from drought, extreme heat, and other hazards exacerbated by climate change.	Climate Resilience	Stormwater Management and Low-Impact Development	Commerce CPE Goal Y.
Policy CR-4.1	Require the design and construction of commercial and residential buildings, public drainage facilities, and their surrounding sites to reduce and treat stormwater runoff and pollution.			Adapted from Commerce CPE Policy P.01. Edited to address Skagit County CPP Policy 12.14.
Policy CR-4.2	Require the use of green infrastructure and low-impact development to decrease the amount of pavement, other impervious surfaces, and the urban heat island effect; address increased storm intensities; and capture, filter, store, and reuse stormwater runoff.			Adapted from Commerce CPE Policy Y.03.
Policy CR-4.3	Develop and maintain a fund to build green infrastructure projects that help capture, filter, store, and reuse stormwater runoff.			Commerce CPE Policy Y.09.
Policy CR-4.4	Manage water resources sustainably to ensure the availability of water in the face of climate change through smart irrigation,			Adapted from Commerce Policy Y.04. Edited to address Skagit

Goal or Policy (* = Optional) <i>Numbering is proposed only.</i>	Proposed Policy Language	Sub-Element	Topic	Policy Source/Notes
	stormwater management, preventative maintenance, water conservation and wastewater reuse, plant selection, and landscape management.			County CPP Goal 10.
Policy CR-4.5	Construct and maintain new water-storage systems (e.g., large cisterns, water towers, and reservoirs) to provide back-up water supplies during droughts and support climate resilience.			Commerce CPE Policy Y.07.
Policy CR-4.6*	Expand municipal reclaimed water systems and allow onsite non-potable water systems to reduce water demand in private-sector commercial and residential buildings.			Commerce CPE Policy Y.05.
Goal CR-5	Ensure the protection and restoration of streams, riparian zones, estuaries, wetlands, and floodplains to achieve healthy watersheds that are resilient to climate change.			Commerce CPE Goal L.
Policy CR-5.1	Establish regulations that require the location of new lots and structures outside of sea-level rise hazard areas.			Adapted from Commerce CPE Policy A.03, edited to address floodplain areas.
Policy CR-5.2	Consider climate change, including sea-level rise, extreme precipitation, increased winter streamflow, and other impacts, in floodplain management planning.			Commerce CPE Policy A.14.
Policy CR-5.3	Implement actions identified in restoration and salmon recovery plans to improve the climate resilience of streams and watersheds.	Climate Resilience	Flood Protection	Commerce CPE Policy L.01.
Policy CR-5.4	Restore floodplains and connectivity within the Gages Slough watershed to reduce flooding and maximize the ecological and climate resilience of riparian ecosystems.			Adapted from Commerce CPE Policy L.05.
Policy CR-5.5	Protect and restore riparian vegetation to reduce erosion, provide shade, and support other functions that improve the climate resilience of the Skagit River.			Adapted from Commerce CPE Policy L.04.
Policy CR-5.6	Work collaboratively with surrounding jurisdictions and Tribes to ensure watershed protection, implement flood hazard reduction programs, and provide ongoing public education regarding flooding and flood hazard reduction efforts.			Drafted to address Skagit County CPP Policies 10.12, 10.13, and 10.15.
Goal CR-6	Increase tree canopy cover to boost carbon sequestration, reduce heat islands, and improve air quality, prioritizing overburdened communities.			Climate Resilience

Goal or Policy (* = Optional) <i>Numbering is proposed only.</i>	Proposed Policy Language	Sub-Element	Topic	Policy Source/Notes
Policy CR-6.1	Increase tree canopy cover and other landscaping, green infrastructure, or low-impact development techniques such as raised planters, street trees, bioswales, or other landscaped planting strips or curb bulbs that help reduce and treat stormwater runoff and pollution, boost carbon sequestration, reduce heat islands, and improve air quality, prioritizing overburdened communities.			Drafted for the City of Burlington.
Policy CR-6.2	Maximize tree canopy coverage in surface parking lots.			Commerce CPE Policy AB.04.
Policy CR-6.3	Improve and expand urban forest management to maximize or conserve carbon storage.			Commerce CPE Policy AB.03.
Policy CR-6.4	Manage tree canopy and forests (including parks, greenbelts, and urban forests) to decrease climate-exacerbated risks from severe wildfires, protect residents, and improve ecosystem health and habitat.			Commerce CPE Policy AE.03.
Policy CR-6.5	Prioritize urban forestry planting resources and funding for frontline communities that are hurt first and worst by climate change.			Commerce CPE Policy AE.08.
Goal CR-7	Restore and maintain critical areas and open space areas to maximize the climate resilience benefits they provide.	Climate Resilience	Ecosystems and Critical Areas	Commerce CPE Policy V.10.
Policy CR-7.1	Identify opportunities to expand habitat protection and improve habitat quality and connectivity to foster climate resilience using conservation area designations, buffers, and open space corridors.			Commerce CPE Policy U.02.
Policy CR-7.2	Ensure no net loss of ecosystem composition, structure, and functions, especially in Priority Habitats, Critical Areas, and Special Management Zones, and strive for net ecological gain to enhance climate resilience.			Adapted from Commerce CPE Policy U.10.
Policy CR-7.3	Maintain and update a critical areas ordinance that incorporates climate change considerations to maximize the climate resilience benefits they provide.			Adapted from Commerce CPE Policy V.06 and V.10.
Policy CR-7.4*	Ensure that tree species selection and planting guidance are updated to be resilient to climate change.			Commerce CPE Policy AE.06.
Goal CR-8	Ensure the effects of wildfire smoke on community members is minimized, where feasible.	Climate Resilience	Wildfire Smoke Preparedness	Drafted for the City of Burlington.
Policy CR-8.1	Develop and implement notification alerts within the community to			Commerce CPE Policy T.05.

Goal or Policy (* = Optional) <i>Numbering is proposed only.</i>	Proposed Policy Language	Sub-Element	Topic	Policy Source/Notes
	reduce the risk of exposure to wildfire smoke and particulate matter.			
Policy CR-8.2	Prioritize at-risk community members for actions that mitigate wildfire smoke, including providing personal protective equipment and filter fans or incentivizing infrastructure updates (e.g., HVAC updates and MERV 13 filters for air intake) for facilities that serve high-risk populations.			Commerce CPE Policy T.04.
Policy CR-8.3	Develop and implement a wildfire smoke resilience strategy in partnership with local residents, emergency management officials, regional clean air agency officials, and other stakeholders.			Commerce CPE Policy T.07.
Goal CR-9	Develop and maintain local government staff members' technical expertise and skills related to climate change and environmental justice so as to improve communitywide policy implementation, equity, and resilience.			Commerce CPE Goal M.
Policy CR-9.1	Create evacuation plans and outreach materials in all applicable languages to help residents plan and practice actions that make evacuation quicker and safer.			Adapted from Commerce CPE Policy M.01. This policy heavily relates to Policy CR-1.1 recommended above in Community Participation and Equitable Outreach.
Policy CR-9.2	Develop resilience hubs – community-serving facilities that are designed to support residents, coordinate communication, distribute resources, and reduce carbon pollution while enhancing quality of life.	Climate Resilience	Emergency Management and Preparedness	Commerce CPE Policy S.07.
Policy CR-9.3	Work with other jurisdictions and organizations to address the social and mental health needs of displaced populations following disasters.			Adapted from Commerce CPE Policy T.03.
Policy CR-9.4	Ensure that the City’s Hazard Mitigation Plan is updated to integrate a climate impacts risk assessment and respond to the impacts of climate change and identifies roles and responsibilities to support a sustainable economic recovery after a disaster.			Adapted from Commerce CPE Policy R.01 and S.09.
Policy CR-9.5	Factor climate impacts into the planning of operations and coordination of preparedness, response, and recovery activities among first responders and partners, including public health, law			Commerce CPE Policy S.08

Goal or Policy (* = Optional) <i>Numbering is proposed only.</i>	Proposed Policy Language	Sub-Element	Topic	Policy Source/Notes
	enforcement, fire, school, and emergency medical services (EMS) personnel.			
Policy CR-9.6	Map transportation infrastructure that is vulnerable to repeated floods, landslides, and other natural hazards, and designate alternative travel routes for critical transportation corridors when roads must be closed.			Commerce CPE Policy S.01
Policy CR-9.7	Develop and implement a strategy to expedite management of debris (e.g., downed tree limbs and buildings blocking roads and streams) after a disaster incident to reduce the risks of subsequent fire, flood, injury, and disease vectors.			Commerce CPE Policy X.01
Goal CR-10	Ensure that cultural resources and practices – including significant historic sites and culturally important traditional foods and natural resources – are resilient to the impacts of extreme weather and other natural hazards worsened by climate change.	Climate Resilience	Cultural Resources and Practices	Commerce CPE Goal Q. Also supports Skagit County CPP Goal 13.
Policy CR-10.1	Establish and maintain government-to-government relations with Native American tribes for the preservation of archaeological sites and traditional cultural properties that are vulnerable to climate impacts.			Commerce CPE Policy Q.03. Also supports Skagit County CPP Goal 13.
Goal CR-11	Ensure that buildings use renewable energy, conservation, and efficiency technologies and practices to reduce greenhouse gas emissions.	GHG Emissions Reduction	Renewable Energy and Energy Use	Commerce CPE Goal E.
Policy CR-11.1	Require additional net-zero greenhouse gas emission features of all new residential and commercial structures.			Commerce CPE Policy E.01.
Policy CR-11.2	Maximize renewable energy sources for the supply of electricity and heat to new and existing buildings.			Commerce CPE Policy E.02.
Policy CR-11.3	Retrofit buildings for energy efficiency, prioritizing community-serving spaces and public facilities.			Adapted from Commerce CPE Policy E.03.
Policy CR-11.4	Develop local microgrid solar and battery storage facilities in low-impact sites.			Commerce CPE Policy E.04.
Policy CR-11.5	Phase out natural gas use in existing publicly owned facilities by [insert target date] and retrofit with electric heat pumps.			Commerce CPE Policy E.05.
Policy CR-11.6	Require all publicly owned buildings to be powered completely by renewable energy by [insert target date] .	Commerce CPE Policy E.06.		

Goal or Policy (* = Optional) <i>Numbering is proposed only.</i>	Proposed Policy Language	Sub-Element	Topic	Policy Source/Notes
Policy CR-11.7	Encourage or incentivize green building certification to improve energy and environmental performance.			Commerce CPE Policy E.07.
Policy CR-11.8	Facilitate the development of community-owned, small-scale renewable energy generation projects.			Commerce CPE Policy E.08.
Policy CR-11.9	Provide overburdened communities with subsidies to offset potential cost increases associated with conversion to non-fossil-fuel energy sources.			Commerce CPE Policy T.14.
Goal CR-12	Prioritize the adaptive reuse of buildings, recognizing the emission-reduction benefits of retaining existing buildings.	GHG Emissions Reduction	Renewable Energy and Energy Use	Commerce CPE Goal F.
Policy CR-12.2	Preserve and reuse existing buildings, where feasible.			Adapted from Commerce CPE Policy F.01.
Policy CR-12.2	Prioritize the preservation and weatherization of housing in overburdened communities, particularly at higher densities, to reduce emissions and increase resilience.			Adapted from Commerce CPE Policy F.02.
Goal CR-13*	Reduce emissions from the wastewater treatment plant, as new technologies become available.	GHG Emissions Reduction	Wastewater Treatment	Drafted for the City of Burlington.
Policy CR-13.1*	Develop a local pollution surcharge for large producers of air pollutants, wastewater, and solid waste.			Commerce CPE Policy X.08. Note: The surcharge could be used as a subsidy to help low-income households convert to solar or heat pumps.
Policy CR-13.2*	Implement strategies to reduce the total volume of wastewater needing treatment as new technology is developed.			Drafted for the City of Burlington. Note: Could align with water conservation initiatives.
Policy CR-13.3*	Consider implementing technologies to decrease nitrous oxide emissions from wastewater treatment plan effluent as new technology is developed.			Drafted for the City of Burlington.
Goal CR-14	Develop targeted campaigns for recycling materials with the highest GHG reduction impact (e.g., paper, metal, food waste).	GHG Emissions Reduction	Solid Waste Management	Commerce CPE Goal D.
Policy CR-14.1*	Incentivize the recycling of construction and demolition debris.			Commerce CPE Policy D.01.
Goal CR-15	Ensure that the community is able to reduce, reuse, and recycle waste materials sustainably.	GHG Emissions	Solid Waste Management	Commerce CPE Goal X.

Goal or Policy (* = Optional) <i>Numbering is proposed only.</i>	Proposed Policy Language	Sub-Element	Topic	Policy Source/Notes
Policy CR-15.1	Create and sustain a business technical assistance program to increase recycling and reduce waste.	Reduction		Commerce CPE Policy D.02.
Policy CR-15.2	Use recycled materials in the construction of transportation and other infrastructure facilities.			Commerce CPE Policy D.03.

LAND USE ELEMENT

Goal or Policy (* = Optional) <i>Numbering is proposed only.</i>	Proposed Policy Language	Topic	Policy Source/Notes
Goal LU-1	Establish land use patterns that increase the resilience of the built environment, ecosystems, and communities to climate change.	Zoning and Development	Commerce CPE Goal V.
Policy LU-1.1	Prior to altering UGAs, consider the potential impacts on climate resilience, greenhouse gas emissions, and vehicle miles traveled associated with each alternative.		This policy was drafted to address Skagit County CPP Policy 1.11.
Policy LU-1.2	Prioritize the development of anti-displacement programs in overburdened communities when increasing densities.		Commerce CPE Policy T.12.
Policy LU-1.3	Prioritize infill development through zoning and permitting processes.		Commerce CPE Policy C.06. Note: While the City has many policies related to infill development, it may be useful to have an overarching goal to prioritize infill development.
Policy LU-1.4	Ensure commercial areas are aggregated in cluster form, pedestrian oriented, and are designed to accommodate public transit, where appropriate.		Drafted for the City of Burlington.
Policy LU-1.5	Prohibit the expansion of polluting industries in overburdened communities via local zoning and development regulations.		Commerce CPE Policy V.12.

Goal or Policy (* = Optional) <i>Numbering is proposed only.</i>	Proposed Policy Language	Topic	Policy Source/Notes
Goal LU-2	Increase housing diversity and supply within urban growth areas to reduce greenhouse gas emissions and support environmental justice.	Zoning and Development	Commerce CPE Goal K. This goal may fit better in the Housing Element, if preferred.
Policy LU-2.1	Develop and implement inclusionary zoning to support greater income diversity in housing types.		Commerce CPE Policy K.06.
Goal LU-3	Ensure that development and redevelopment projects are resilient to the impacts of climate change.	Development Regulations and Standards	Commerce CPE Goal A.
Policy LU-3.1	Acquire properties or easements on properties that are vulnerable to climate-exacerbated hazards and are or will become unsuitable for development.		Commerce CPE Policy A.05. This policy was also highlighted in the full Climate Policy Audit, for potential edits to Land Use Policies 2.4.3, 2.4.3.4 and Natural Resources Policy 4.5.3.3. It could be included in the plan through the recommended edits in the full Climate Policy Audit, or this new policy could be included in the plan on its own.
Policy LU-3.2	Direct new development into areas where exposure to climate hazards is low.		Commerce CPE Policy V.05. This policy may be combined or grouped with Natural Resources Policy 4.5.3.2.
Policy LU-3.3	Establish development regulations that incorporate best practices for reducing the risk of wildfire, extreme heat, flooding, and other climate-exacerbated hazards.		Commerce CPE Policy A.01.
Policy LU-3.4	Develop or modify design standards to integrate exterior building features that reduce the impacts of climate change and increase resilience.		Commerce CPE Policy P.06.
Policy LU-3.5*	Choose native drought- and pest-resistant trees, shrubs, and grasses in restoration efforts to support climate resilience.		Commerce CPE Policy U.05.
Goal LU-4*	Maximize the solar access of site design, where practicable, for new solar-ready residential and commercial buildings.	Development Regulations and Standards	Adapted from Commerce CPE Goal G.
Policy LU-4.1*	Require solar panels on buildings with large rooftops, as well as within or over parking areas.		Commerce CPE Policy G.03.

TRANSPORTATION ELEMENT

Goal or Policy (* = Optional) <i>Numbering is proposed only.</i>	Proposed Policy Language	Topic	Policy Source/Notes
Goal TR-1	Establish land use patterns that increase the resilience of the built environment, ecosystems, and communities to climate change.	Multimodal Transportation	Commerce CPE Goal I.
Policy TR-1.1	Implement multimodal transportation planning to reduce single-occupancy vehicle dependence and greenhouse gas emissions.		Commerce CPE Policy H.03.
Policy TR-1.2	Implement travel demand management (TDM) programs and strategies.		Commerce CPE Policy I.01.
Policy TR-1.3	Increase multimodal capacity in coordination with the location of higher-density housing and commercial centers.		Commerce CPE Policy I.04.
Policy TR-1.4	Prioritize permitting for transit-oriented development (TOD) proposals.		Commerce CPE Policy I.24.
Policy TR-1.5	Work with Skagit Transit to expand public transportation options in the city and improve the speed, frequency, coverage, and reliability of public transit.		This policy was drafted to address Skagit County CPP Policy 14.1.
Policy TR-1.6	Prioritize and promote public transit expansion and use through coordination of land use and transportation planning.		Commerce CPE Policy H.01
Policy TR-1.7	Eliminate parking minimum requirements and establish parking maximums OR Reduce parking requirements where there are multimodal options available.		Commerce CPE Policy AC.01 and AC.02.
Policy TR-1.8	Site, construct, and maintain new transportation facilities and transportation system improvements to minimize noise levels, per capita VMT, and greenhouse gas emissions.		This policy was drafted to address Skagit County CPP Policies 3.12 and 14.1.
Goal TR-2	Encourage and improve the safety of active transportation methods to improve public health and reduce greenhouse gas emissions.	Active Transportation	Drafted for the City of Burlington.
Policy TR-2.1	Create a safe, well-connected, and attractive bicycle and pedestrian transportation network to encourage active transportation.		Commerce CPE Policy I.14.
Policy TR-2.2	Improve street connectivity and walkability, including sidewalks and street crossings, to serve as potential evacuation routes.		Commerce CPE Policy W.02.
Policy TR-2.3	Prioritize, develop, and maintain mobility hubs in transportation-efficient locations — especially in overburdened communities experiencing a scarcity of transportation alternatives.	Commerce CPE Policy I.16.	
Goal TR-3	Expand electric vehicle infrastructure throughout the city (e.g., charging stations and dedicated lanes for electric cars and buses).	Electric Vehicles	Commerce CPE Goal AD.

Goal or Policy (* = Optional) <i>Numbering is proposed only.</i>	Proposed Policy Language	Topic	Policy Source/Notes
Policy TR-3.1	Require electric vehicle charging infrastructure in all new and retrofitted buildings.		Commerce CPE Policy AD.01.

PUBLIC FACILITIES AND SERVICES ELEMENT

Goal or Policy (* = Optional) <i>Numbering is proposed only.</i>	Proposed Policy Language	Topic	Policy Source/Notes
Goal PF-1	Ensure that energy infrastructure – including generation and transmission – is able to accommodate renewable energy opportunities and to withstand and recover quickly from the impacts of extreme weather and other natural hazards worsened by climate change.	Infrastructure and Public Facility Resilience	Commerce CPE Goal O.
Policy PF-1.1	Install distributed renewable energy generation and battery infrastructure at public facilities to store renewable energy generated on site and provide emergency power that ensures continuity of operations.		Commerce CPE Policy O.02.
Policy PF-1.2	Work with energy utilities to improve the safety and reliability of infrastructure vulnerable to climate change.		Commerce CPE Policy O.04.
Goal PF-2	Ensure capital facilities are resilient to natural and climate-exacerbated hazards and can accommodate projected growth.		Drafted for the City of Burlington.
Policy PF-2.1	Consider future climate conditions during the siting and design of capital facilities, including changes to temperature, rainfall, and sea level, to ensure they function as intended over their planned life cycle.		Commerce CPE Policy A.12.
Policy PF-2.2	Plan for and invest in capital facilities to accommodate infill development.		Commerce CPE Policy K.07. The existing Comprehensive Plan has many policies related to infill development, but no explicit policy to develop capital facilities that can accommodate

Goal or Policy (* = Optional) <i>Numbering is proposed only.</i>	Proposed Policy Language	Topic	Policy Source/Notes
			that type of growth.
Goal PF-3	Increase the energy efficiency of the city’s public facilities to reduce GHG emissions.	City Facilities and Procurement Electric Vehicles	Drafted for the City of Burlington. Note: this goal could also be combined with existing Goal 6.4.2 to acknowledge the climate benefits of the associated policies, such as Policy 6.4.2.2 (Ensure new public facilities and capital investments incorporate efficiency measures that reduce water and energy consumption and gradually upgrade existing facilities and infrastructure. Consider the use of energy efficient lighting, HVAC systems, solar power, and electric vehicles.) and 6.4.2.3 (Design public facilities and infrastructure with a long term view to reduce future repair, maintenance, and servicing costs, and to protect public investments from natural disasters and other hazards.
Policy PF-3.1	Pursue energy efficient upgrades to the city’s public facilities and ensure compliance with the Washington Clean Building Performance Standard (CBPS).		Drafted for the City of Burlington.
Policy PF-3.2	Explore funding sources to support energy efficiency upgrades of the city’s public facilities, such as incentive or rebate programs offered by Cascade Natural Gas and Puget Sound Energy and similar programs.		Drafted for the City of Burlington.
Goal PF-4	Convert public fleets to zero-emission vehicles and develop supporting infrastructure and programs to decrease GHG emissions.		Drafted for the City of Burlington.
Policy PF-4.1	Replace 80% of municipal vehicles with electric vehicles supported by sufficient charging infrastructure by 2035.		Drafted for the City of Burlington.

Goal or Policy (* = Optional) <i>Numbering is proposed only.</i>	Proposed Policy Language	Topic	Policy Source/Notes
Policy PF-4.2	Pursue funding to support the electrification of the city’s fleet, such as by considering Puget Sound Energy’s Up and Go Electric for Fleet Program and similar incentive or rebate programs to support the transition to electric vehicles and development of charging infrastructure.		Drafted for the City of Burlington.
Goal PF-5	Update the city’s procurement policies and code provisions to encourage the procurement of materials that reduce greenhouse gas emissions and/or increase community resilience.		Drafted for the City of Burlington.
Policy PF-5.1	Prioritize sustainable materials in the procurement of building materials for public works projects, which may include materials that are locally sourced, energy-efficient, recyclable, have a low environmental impact, as well as possess Environmental Product Declarations (EPDs) and Health Product Declarations (HPDs).		Drafted for the City of Burlington.
Policy PF-5.2	Incorporate sustainable practices into the procurement of materials and services for capital improvement projects including the use of energy-efficient and low-emission building materials.		Drafted for the City of Burlington.
Policy PF-5.3	Develop procurement policies that prioritize materials and services that conserve resources, holistically evaluate benefits and impacts, consider the life cycle of the product, ensure health and safety, and promote innovation.		Drafted for the City of Burlington.

ECONOMIC DEVELOPMENT ELEMENT

Goal or Policy (* = Optional) <i>Numbering is proposed only.</i>	Proposed Policy Language	Policy Source/Notes
Goal ED-1	Ensure that the local economy is resilient to climate disruptions and fosters business opportunities associated with climate mitigation and adaptation.	Commerce CPE Goal R.
Policy ED-1.1*	Support local businesses’ efforts to bolster climate preparedness and continuity of operations.	Commerce CPE Policy R.02.

Goal or Policy (* = Optional) <i>Numbering is proposed only.</i>	Proposed Policy Language	Policy Source/Notes
Policy ED-1.2*	Create and sustain a business technical assistance program to increase recycling and reduce waste.	Commerce CPE Policy B.02.

PARKS AND RECREATION ELEMENT

Goal or Policy (* = Optional) <i>Numbering is proposed only.</i>	Proposed Policy Language	Policy Source/Notes
Goal PR-1	Enhance the city’s existing parks, trails, and tree canopy to improve public health and wellbeing, increase carbon sequestration, and foster greater resilience to climate hazards.	Drafted for the City of Burlington.
Policy PR-1.1	Enhance the resilience of parks and recreational trails by assessing and addressing climate hazards and impacts.	Commerce CPE Policy W.05.
Policy PR-1.2	Retain the city’s existing tree canopy and equitably expand the tree canopy, prioritizing areas lacking tree cover and in multifamily housing developments.	Drafted for the City of Burlington.
Policy PR-1.3	Identify and plan for climate impacts to valued community assets such as parks and recreation facilities, including relocation or replacement.	Commerce CPE Policy A.13.
Policy PR-1.4	Utilize water conservation methods and technologies in development of irrigation infrastructure within parks and recreation areas so as to foster climate resilience.	Commerce CPE Policy Y.01.
Policy PR-1.5	Ensure that all community members have equitable access to green space within a half mile.	Commerce CPE Policy T.09.