February 19, 2022

Senator Patty Kuderer, Chair, Senate Housing and Local Government Committee, and members of the Committee

The Washington State Chapter of the American Planning Association (APA Washington) respectfully submits comments in support of Engrossed Second Substitute House Bill 1099, which would incorporate climate considerations into the state’s planning framework. We provided supportive comments on this bill during the 2020/2021 Legislative Session and attached are copies of our February 15 and March 16, 2021 letters.

As noted in these letters, preparing for a warming world is a necessity and Washington needs to act now. Reducing our carbon footprint is a moral obligation to today’s citizens of Washington, not to mention future generations, as well as a wise investment in resiliency and the state’s economy. We have reviewed the engrossed second substitute bill and agree that the work by local governments and state agencies initiated by the bill is crucial to our health, economy, and sustainability. The Fiscal Note identifies a substantial price tag for this work; however, the cost will only rise with continued inaction. For these reasons, APA Washington continues to strongly support this bill and we offer the following specific comments:

**Planning Support**: We appreciate the planning and technical support for local governments under sections 5 and 8. We hope that the guidance will address the following topics in particular:

- The relationship between climate policies and science-based protection of critical areas.
- Best practices for reducing wildfire risk while balancing protections for critical areas, and a clear definition of wildland-urban interface area for the new requirements in section 4 (page 7, lines 34 - 38).
- Effective, legally defensible, and sustainable multimodal concurrency programs.
- Clear, consistent, and coordinated data among state agencies and local jurisdictions. The lack of coordination among state agencies in addressing climate change has led to significant data gaps that would hinder jurisdictions in the preparation of Climate Change and Resiliency Elements newly required under this bill. For that reason, the state model element and its guidance should provide support for jurisdictions to address these data gaps. The federal Centers for Disease Control and Prevention (CDC) has already funded county-level profiles on health through their program entitled Building Resilience Against Climate Effects (BRACE) that could assist in our state process.

**Local Government Inclusion in Guidance Development**: The group that the Department of Commerce convenes to oversee the development of model guidance should include representatives of local government (counties and cities of varying sizes) as well as state agency and tribal representation.
**Funding:** The Fiscal Note includes allocations for state agency efforts, but while significant work required for affected cities and counties is identified in the narrative, a specific cost estimate for local government is not provided (nor likely possible). APA supports a well-funded grant program for local government integration of climate considerations into local plans in addition to the other state support such as guidance, model plan provisions, and protection from appeals when local governments use state guidance.

The Washington State Chapter of the American Planning Association (APA Washington) is a 1,400-member association of public and private sector professional planners, planning commissioners and elected officials, who serve city, county, regional, state, and tribal governments, as well as private sector clients in our state. Our members work every day to implement the state’s growth management and planning framework and appreciate the opportunity to provide you with recommendations that will improve the practice of planning and the quality of life for all Washingtonians.

We would be happy to provide additional information or answer any questions you may have at this point. Thank you for your consideration.

Best regards,

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President, Washington Chapter of the American Planning Association