City of Royal City

City of Royal City Climate Change and Resiliency Sub-Element

Policy Audit

August 24, 2026

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1. Introduction

The Washington State Growth Management Act (RCW 36.70A) requires fully planning Cities, which includes the City of Royal City, to update their comprehensive plans on a 10-year cycle called a Periodic Update. In 2023, state legislation, HB 1181, added the requirement for including climate hazard resiliency into these City plans.

The City of Royal City has been planning for some time now, and has many documents drafted to assess current conditions and assets, look at what the burden on those will be as the City grows, and how they will need to adapt to accommodate foreseen changes. The City's current planning documents include:

- 2025 amended 2018-2038 Comprehensive Plan
- 2020 Parks and Recreation Plan
- 2025 Wastewater Facility Plan
- 2025 Amended Water System Plan
- Six-year Transportation Improvement Plan

In addition to the planning documents, the City also has regulation and standards to follow, which are intended to keep the City on course for achieving the goals outlined in the plans above. Those documents include:

- The City's Municipal Code
    - Critical Area Ordinance
    - Subdivision Code
    - Zoning Code
- City Developer Standards

As a part of HB 1181s requirement for incorporating a climate resiliency element into the City's comprehensive plan, these planning documents need to be reviewed for opportunities, gaps, and barriers. There may be opportunity to strengthen existing resiliency policy, add new policy where gaps are discovered, and adapt policy by identifying conditions that can inadvertently create barriers for achieving climate resiliency from the hazards identified through the climate impact analysis.

The 4 climate hazards identified as having the most impact to the City of Royal City and its assets include: drought, extreme heat, extreme precipitation, and wildfire smoke and air quality. These hazards are the focus of this existing policy audit.

2. Comprehensive Plan Climate Resiliency Policy

An exhaustive audit of all the City's documents would be time consuming and overwhelming for a meaningful conversation. The Department of Commerce guidance recommends identifying between 20 and 40 measures between the City's plans to assess[1]. Since the City's Comprehensive Plan's policies and goals guide the development of each additional planning document in the City, they are the primary focus of this audit. Adapting and updating the subsequent plans to be consistent with the Comprehensive Plan will occur naturally through the years.

Within the City Comprehensive Plan there are 8 elements, or chapters, covering specific City components, each with separate goals and policies. Those 8 elements are:

- Critical Areas
- Land Use
- Housing
- Capital Facilities
- Utilities
- Transportation
- Parks and Recreation
- Economic Development

Looking through the lens of the 4 main climate hazards in the following sections, polices are highlighted that already address these hazards explicitly or implicitly. Knowing what is addressed already helps identify the gaps in the City's planning for the future that need to be filled with expanded, revised, or new policy.

Drought

Through the Climate impact analysis, drought has been determined to be a concerning hazard due to its negative impacts on the following City assets:

- agriculture growing and processing
- fire control services
- law enforcement
- City public events

[1] Climate Element Planning Guidance December 2023 — Intermediate Version

IntermediatePlanningGuidance_FINAL.pdf

- schools
- parks and open spaces
- the City water system
- Shrubsteppe ecosystems
- USBR irrigation canals
- trucking industry
- concrete processing
- Port district industrial park
- housing.

Though indirectly, drought-relevant policies from the Comprehensive Plan can be found throughout. Most clearly, in the Capital Facilities and Economic Development elements, there are policies that recognize water supply as a limited infrastructure resource and tie future growth to water rights and system capacity. Several Land Use and Utility policies encourage growth where services already exist or can be extended efficiently. Compact growth can reduce infrastructure strain, limit new water-system expansion, and reduce water loss associated with sprawling extensions.

More directly, the Comp Plan explicitly mentions drought-tolerant landscaping in commercial and pedestrian environments and identifies that critical aquifer recharge areas must have regulations to protect them. Drought tolerant landscaping reduces water demand while protecting recharge areas and groundwater quality helps maintain long-term water reliability, especially in drought conditions.

Stormwater control policies are provided to prevent erosion and flood hazards, but they miss an opportunity to turn stormwater into an asset, aa a means of reducing drought stress if able to be stored. Also, the plans focus on promoting growth in residential, commercial, and industrial zones, means there will inherently be more demand for water. These growth policies could be tempered with encouragement for water reuse, reclamation, or reduction practices to be more drought resistant.

The City is already running its sewer wastewater through a water reclamation facility. This allows wastewater to be treated for direct recharge of the ground water. However, the significance of this system has not been mentioned in Comprehensive Plan policies. There is an opportunity to create policy encouraging the use of this system for drought hazard resilience.

The Table below summarizes the climate resiliency policy for drought found in the Comprehensive Plan.

Measure	Summary	Opportunities/Gaps/Barriers
Land Use		
LU 1.2	Preserve open space	Should specify a mix of natural and artificial

LU 2.2 LU 2.17 LU 3.12 LU 4.3	and encourage pedestrian movement in developments and improve existing structures for efficiencies.	shade dominant, and drought tolerant open space, so it doesn't add to water shortage issues or heat island effects. Lower energy usage helps reduce water usage at hydro-damns.
Critical Areas		
CA 1.1 CA 1.3 CA 1.6	Educate about and protect groundwater from contaminants, reduce erosion contamination, and provide buffers to critical areas from these contaminants.	Water protections are good but should evaluate contaminants (sediments/dust) being increased because of drought and dryer weather. The appearance of critical areas may change from drought events as well. Stormwater could be turned into an asset if controlled and contained.
Housing		
H 1.2	Encourage diversification of efficient home types.	Add efficiency and shared facility incentives that reduce energy usage to reduce water usage at hydro-damns, and irrigation needs.
Capital Facilities		
CF 1.4 CF 1.16 CF 1.17 CF 2.1 CF 3.1	Capital Facilities should work to reduce hazard impacts	Add drought resilience to the measures when planning for capital facilities.
Transportation		
Goal T3	Plan for non-motorized travel	Need to assure paths stay resilient to drought, by not being water dependent.
Economic Development		
ED 1.3 ED 3.2	Assuring water is available for housing and industry, and revitalize/ create a downtown core	Looking at how to provide water to a growing population and economy, while supply is limited in a drought. How to balance these competing needs and assure revitalization plans are resilient to drought.
Parks and Recreation		
PR 2.1 PR 2.2 PR 3.4 PR 3.5 PR 3.6 PR 5.1 PR 6.1	Creating a pedestrian/bike path network, connecting parks and open space in new development. Landscaped to improve the City	Need to assure paths and open space stay resilient to drought, by not being water dependent.

PR 7.1	Appearance	

Extreme Heat

Through the Climate impact analysis, extreme heat has been determined to be a concerning hazard due to its negative impacts on the following City assets:

- agriculture growing and processing
- school services
- regional health facilities
- fire control services
- law enforcement
- City public events
- parks, trails, and open spaces
- the City water system
- City streets, State Route 26
- Shrubsteppe and wetland ecosystems
- USBR irrigation canals
- aged building inventory
- the Port Districts industrial park and the trucking industry
- housing

The Comp Plan addresses heat resilience indirectly through parks and land use policies. Parks policy calls for buffer areas and sidewalks along pedestrian corridors to improve aesthetics and pedestrian safety, while they also support a trail system for walkers, joggers, bicyclists, and others. Land Use policy encourages developers to designate open space through clustering, density bonuses, shadow platting, preservation efforts, and critical areas policies. These policies can help reduce heat exposure by expanding shaded, walkable, and open-space networks.

Transportation policies encourage alternative modes of getting around, such as walking, biking, and using public transit, but heat events could discourage these uses and be a barrier to being an effective policy. The City should consider how to keep these measures effective during extreme heat events, while balancing that need with water conservation efforts to address drought events as discussed before. How existing transportation policy can worsen heat impacts, is by requiring extensive street paving and parking. Large expanses of asphalt paving add to an urban heat island effect. These policies could be amended to require parking maximums and minimizing street paving as needed to support

transportation levels of service. Also, having paving required to be lighter in color to increase its albedo, or amount of reflected solar heat gain, is an opportunity to consider.

The Table below summarizes the climate resiliency policy for extreme heat found in the Comprehensive Plan.

Measure	Summary	Opportunities/Gaps/Barriers
Land Use		
LU 1.2 LU 2.2 LU 2.17 LU 3.12 LU 4.3	Preserve open space in development, while reducing spawl and making use of existing structures.	Should specify shade dominant open space, so it remains cooler and doesn't add to a heat island effect. Passive cooling could make existing structures more comfortable during heat events.
Critical Areas		
CA 1.1 CA 1.3	Protect critical areas, through development, and provide buffers to protect them while educating of their significance.	Hotter and dryer weather can increase the level of impacts to critical areas during development. The appearance of critical areas may change from hotter temperatures events as well.
Housing		
H 1.2	Encourage preservation of and build more diverse and efficient homes.	Integrate passive cooling methods into housing types both new and existing.
Capital Facilities		
CF 1.4 CF 1.16 CF 1.17 CF 3.1	Capital Facilities should work to reduce hazard impacts and secure water rights as necessary	Water capacity can be used for cooling resource, and capital facilities should include resiliency to high temperatures and reduce outputting excess heat if possible.
Transportation		
T 1.2 T 1.4 Goal T3	Provide multimodal transportation for a diverse range of people.	Need to maintain comfort from heat for continued use of outdoor paths.
Economic Development		
ED 3.2	Develop a community center	Could be a cooling center during extreme heat events.
Parks and Recreation		
PR 2.1 PR 2.2 PR 3.4	Creating a pedestrian/bike path network, connecting	Need to assure paths and open space stay resilient to heat, by providing shade and cooling.

PR 3.5	parks and open space in new development. Landscaped to improve the City Appearance	
PR 3.6		
PR 5.1		
PR 6.1		
PR 7.1		

Extreme Precipitation

Through the Climate impact analysis, extreme precipitation has been determined to be a concerning hazard due to its negative impacts on the following City assets:

- agriculture growing and processing
- City public events
- parks, trails, and open spaces
- the City water system
- City streets and stormwater facilities
- state route 26
- wetland ecosystems
- the trucking industry.

The Comp Plan's strongest existing precipitation-resilience policies relate to stormwater, drainage, flooding, and erosion. Land Use policy directly supports flood-risk reduction, stormwater capacity planning, and water-quality protection during intense rainfall. Through policy to protect Critical Areas, these also serve to help preserve natural flood storage, infiltration, and erosion protection.

The policies that encourage a connected linkages of open spaces and parks provide opportunity to collect and use storm water throughout the City, if planned accordingly to precipitation projections. This combined with policy to encourage dense cluster housing and reduce urban sprawl, create efficiencies of impervious space and open more land area for natural infiltration.

Policy for growth with large parking and street requirements increased rainwater control needs, with more impervious surfaces prohibiting natural infiltration. These policies could be tempered with incentives to reduce areas needed to be paved or use of new materials and methods that allow for water infiltration.

The Table below summarizes the climate resiliency policy for extreme precipitation events found in the Comprehensive Plan.

Measure	Summary	Opportunities/Gaps/Barriers
Land Use		
LU 1.2 LU 2.2 LU 2.17 LU 3.12 LU 4.3 LU 5.5	Preserve open space and encourage pedestrian movement in developments and improve existing structures for efficiencies while providing appropriate drainage facilities.	Should evaluate erosion being increased because of extreme precipitation. An opportunity to collect precipitation in open spaces or near structures for future irrigation use is missing.
Critical Areas		
CA 1.1 CA 1.3 CA 1.4 CA 1.6	Educate about and protect groundwater from contaminants, recycling and other planning to reduce erosion contamination, and provide buffers to critical areas from these contaminants.	Recycling policy has opportunity to include stormwater or other primary water sources that can be safely reused. The City already has a water reclamation facility for its wastewater for example.
Housing		
H 1.2	Encourage preservation of and build more diverse and efficient homes.	Add supportive policy that re-used structures address stormwater that may not have been required before. Add incentives to privately manage stormwater on site
Utility		
U 1.12	Incentivize recycling of debris and yard waste.	Opportunity to create mulch from yard waste that better retains water for gardens, planted areas, and open space.
Capital Facilities		
CF 1.4 CF 1.16 CF 1.17 CF 2.1 CF 3.1	Capital Facilities should work to reduce hazard impacts and secure water rights as necessary with a set level of service	See how extreme precipitation events can work into the level of service policy. Can some of the LOS requirement be offset by using stormwater while simultaneously reducing its potential hazard effects?
Transportation		
Goal T3	Plan for non-motorized travel	Provide shelters or places to get out of the rain during extreme events. Assure adequate drainage is available so the investment in this infrastructure isn't

		damaged. Minimize impervious surfaces that would require increased drainage infrastructure.
Economic Development		
ED 3.2	Develop a community center	Opportunity for a civic center to showcase effective stormwater management and reuse for the community.
Parks and Recreation		
PR 6.1 PR 7.1	Providing landscaping and maintenance through the City to improve appearance.	Consider landscaping with root systems that prevent erosion.

Wildfire- Smoke and Air Quality

Through the Climate impact analysis, wildfire smoke and air quality have been determined to be a concerning hazard due to its negative impacts on the following City assets:

- school services
- regional health facilities
- the library
- fire control services
- law enforcement
- agriculture growing and processing
- City public events
- parks, trails and open spaces
- SR-26 traffic
- wetland ecosystems
- the Port Districts Industrial Park
- trucking industry
- aged building inventory

The Comp Plan addresses smoke and air quality indirectly rather than through wildfire smoke-specific policies. In general, it does well providing proactive policies in reducing air quality pollution, by promoting a walking path and trail system, encouraging light and clean

industrial uses for economic development and compact infill for housing, improving the efficiencies of existing structures, and supports building a healthy tree and plant canopy. These elements reduce pollution generation from local sources and look to naturally clean the air with a healthy plant ecosystem.

Current policy gaps remain however, regarding smoke and air quality. The comprehensive plan does not establish explicit wildfire smoke response actions, clean-air shelter strategies, indoor air filtration standards, or public health protocols for smoke events.

The Table below summarizes the climate resiliency policy for Wildfire and Air Quality Concerns found in the Comprehensive Plan.

Measure	Summary	Opportunities/Gaps/Barriers
Land Use		
LU 2.19	Maintain Parcels to reduce risk of fire hazards	Puts protections over fires that could occur locally but does not address air quality concerns from fire regionally that can be controlled by local policy.
Critical Areas		
CA 1.1 CA 1.3 CA 1.4	Protect critical areas through development and provide buffers to protect them while educating of their significance. Promote recycling efforts.	Wildlife habitat and species will struggle from smoke and air quality and be more at risk than before. Need policy for when habitat preservation presents wildfire danger. Recycling reduces debris accumulation that present a local fire risk
Housing		
H 1.2	Encourage preservation and build smaller more efficient homes.	Preserved housing needs upgrades to filter outdoor air
Utility		
U 1.12	Incentivize recycling of debris and yard waste.	Potentially reduces local fire hazards and regional air quality concerns.
Capital Facilities		
CF 1.16 CF 1.17 CF 3.1	Capital Facilities should work to reduce hazard impacts, life cycle costs, and greenhouse gas emissions.	Add air quality resilience to the measures when planning for capital facilities.
Transportation		
T 1.2	Provide multimodal	Need to maintain comfort from air quality

T 1.4 Goal T3	transportation for a diverse range of people.	and fire risk for continued use of outdoor paths and open spaces.
Economic Development		
ED 3.2	Revitalize/ create a downtown core with Community Center	The Center can be used as a shelter from extreme smoke/ air quality events for the most vulnerable.
Parks and Recreation		
PR 2.1 PR 2.2 PR 3.4 PR 3.5 PR 3.6 PR 5.1 PR 6.1	Creating a pedestrian/bike path network, connecting parks and open space in new development. Landscaped to improve the City Appearance	Need to maintain comfort from air quality and fire risk for continued use of outdoor paths and open spaces.

3. Other Barriers

Barriers often arise when implementing new policy and measures, and though these common challenges may make the climate hazard resiliency goal more difficult to achieve, they also give a community an important reality check. Asking if a new policy is feasible, or something the City can realistically implement in a reasonable amount of time, can help identify which of the common barriers exist.

Potential barriers that the City of Royal City may face in the creation and implementation of new climate resiliency policy would include:

- Local funding constraints for new climate projects, including state and federal budget constraints and shifting legislative priorities
- Limited staff capacity
- Lack of buy-in from community members and/or Council members

If these barriers are restrictive of the implementation of new climate resiliency policy, it's important to prioritize which ones have the most impact on the community when facing limited resources and explore ways to remove these barriers over time to allow for a more fully integrated resiliency implementation plan.

4. Next Steps

Since there are resource limitations as noted above, before jumping into creating new measures and adapting current City policy, it is important that the City goes through a Vulnerability and Risk Assessment. This process will look at the community and its current level of preparedness to address climate hazards and help guide the City in prioritizing the changes and additions needed. This assessment will reveal what the most effective policies will look like, assuring the City is getting the "best bang for its buck", as it invests in having new policy adopted and implemented.

Once that is complete, draft policies and measures can begin to be integrated into the City's Comp Plan, and a climate resiliency focused element added. This will be workshopped with the community for maintaining consistency with their vision of the City of Royal City, while addressing these hazards, and particularly those having the most impact on the most vulnerable.