

January 22, 2026

To: The Honorable members of the Whatcom County Council  
From: The Whatcom County Planning Commission

Dear Honorable Councilmembers,

The Whatcom County Planning Commission recommends that you require the Cities of Bellingham and Blaine adopt reasonable measures (as defined by the Growth Management Act) to amend their plans to meet their obligations under the GMA.

Our reasoning is as follows:

### **City of Bellingham**

Bullet point 56 from page 12 of 79 of the Preliminary Draft

*“To fully satisfy current and anticipated needs Bellingham estimates it would need to **allocate an additional \$133 million per year** between 2025 and 2045 to fund about 220 additional affordable housing units annually.”*

Bellingham is proposing to meet its GMA obligations by raising \$133 million in new taxes, (~\$3,000 per household, per year) to subsidize the expense of new housing, instead of addressing the root cause of the problem (cost).

1. There is no legal authority to raise taxes by \$3,000 per household – it can't be collected.
2. If it did, an extra \$3,000 a year in taxes would push many city homeowners into poverty.
3. Landlords would have to pass the tax on as a \$250 a month increase to renters.
4. A \$3,000 annual tax difference on City homeowners will drive more growth to rural areas

The Dept. Commerce documents Whatcom's per-unit construction costs of (\$475,818) as higher than any County (after Okanogan) and 55% above the statewide median (see page 65 of <https://deptofcommerce.app.box.com/s/1d9d517q509r389f0mjpowh8isjpirlh>).

The 2026 Dept. Commerce report update references recent Mercer Island and Kitsap court cases which determined local governments had to identify funding sources with their plans.

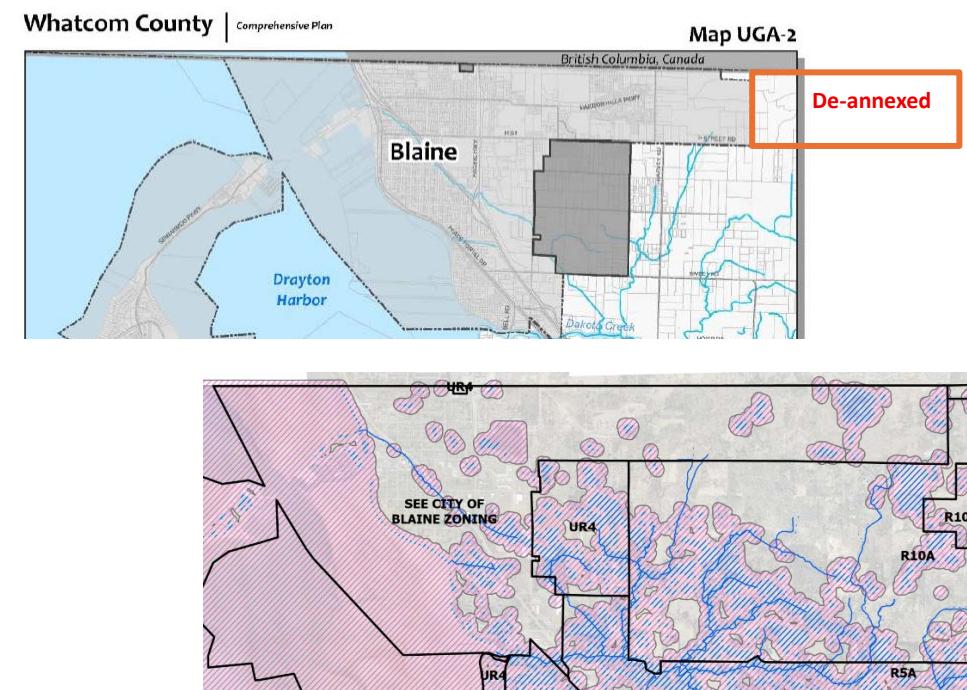
## City of Blaine

As the maps below show, the land Blaine proposes as their UGA is substantially more impaired by Wetlands and Buffers than the area they have de-annexed.

### Bullet point 83 from page 19 of 79 of the Preliminary Draft

*"The land capacity analysis estimates that the UGA, with the modifications proposed by the City of Blaine, can accommodate approximately 1,237 more jobs. Therefore, the commercial/industrial land capacity of the UGA is sufficient to accommodate job growth over the planning period.*

*Chapter 2 – Land Use*



*Streams (blue lines) wetlands (blue hatch) and buffers (purple)*

Development in the UGA will require a massive investment to create wetlands mitigation credits. Blaine should be instructed to identify how much wetlands mitigation will be required, where the mitigation will occur, what it will cost, and whether it is economically feasible for future development to actually support the cost.

Sincerely

The Whatcom County Planning Commission