



Memorandum

February 28, 2023

To: The Honorable Satpal Sidhu, Whatcom County Executive
The Honorable Whatcom County Council

From: Matt Aamot, Senior Planner

Through: Steve Roberge, Assistant Director

RE: Buildable Lands Report

The Washington State legislature amended the Growth Management Act (GMA) in 1997 to include a "review and evaluation program," also known as the buildable lands program (RCW 36.70A.215). At that time, the review and evaluation program applied to six counties: Clark, King, Kitsap, Pierce, Snohomish, and Thurston. The State legislature amended the GMA in 2017 to add Whatcom County to the list of counties required to undertake a review and evaluation program ([ESSSB 5254](#)).

The review and evaluation program has several main components, which are summarized below:

- Determining whether a county and its cities are achieving urban densities within urban growth areas by comparing growth and development assumptions contained in the county and city comprehensive plans with actual growth and development that has occurred;
- Determining whether there is sufficient land that is suitable for development in the future; and
- Identifying reasonable measures, if necessary, to reduce the differences between growth assumptions contained in comprehensive plans and actual development patterns ([RCW 36.70A.215](#)).

The County and the Cities, with the assistance of a consultant, developed the *Buildable Lands Report 2022* to address these state requirements. This Report, originally issued on July 7, 2022, contains countywide findings and jurisdiction profiles that address each individual urban growth area.

The Planning Commission held a public hearing on October 13, 2022 and recommended that the County Council adopt the *Buildable Lands Report 2022*. Main issues discussed at the Planning Commission included:

1. Housing affordability; and
2. Land supply for single family homes in Bellingham.

Staff made a presentation on Buildable Lands at County Council's Planning and Development Committee on November 9, 2022. The Council's Planning and Development Committee further discussed the *Buildable Lands Report* on December 6, 2022, January 10, 2023, and January 24, 2023. In an email dated January 23, 2023, Bob Carmichael proposed revisions to the draft Ordinance for consideration by the Council. At the January 24, 2023 meeting, the Council Committee discussed housing affordability and land supply issues, particularly as they relate to Bellingham, and requested staff to work with Mr. Carmichael to see if we could reconcile differences relating to the draft Ordinance.

The County, the City of Bellingham and Mr. Carmichael's team met on January 30 and February 15 to discuss the *Buildable Lands Report* and the proposed Ordinance. As a result of these discussions, the City of Bellingham agreed to revise the *Buildable Lands Report*, including:

- Identifying "reasonable measures" the City has already taken (pages 31-33);
- Concluding that additional "reasonable measures" are needed (page 34); and
- Identifying additional "reasonable measures" that the City could consider implementing (pages 34-35).

Pursuant to these discussions, the draft Ordinance language has also been amended. Mr. Carmichael indicated concurrence with the changes in emails dated February 22 and February 27, 2023. The City/County Planner Group agreed to the changes, and a revised *Buildable Lands Report* was issued on February 27, 2023.

After the Council's Planning and Development Committee completes review, we request that the County Council introduce an ordinance relating to the *Buildable Lands Report* and, two weeks after introduction, hold a public hearing prior to voting on the draft ordinance.

Thank you for your review of this matter.