



Whatcom County Comprehensive Plan

Land Capacity Analysis Methodology for Emergency Housing

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Introduction

The Whatcom County Department of Planning and Development Services, in coordination with the cities in Whatcom County, is engaged in a multi-year project to update the Whatcom County Comprehensive Plan and conduct an urban growth area (UGA) review by 2025, as required by the Washington State Growth Management Act (GMA). As part of this process, and as required by recent amendments to the GMA resulting from the passage of House Bill 1220 (2021), jurisdictions are required to analyze land capacity to meet Emergency Housing and Emergency Shelter targets developed by the Department of Commerce (Commerce) in accordance with the Housing for All Planning Tool (HAPT).

This report outlines the methodology for this analysis, which is substantially based on the methodology outlined in the Department of Commerce's "Guidance for Updating Your Housing Element" (August 2023). Per e-mail communication with the Department of Commerce in June 2024¹, a quantitative Land Capacity Analysis (LCA) for Emergency Housing is required for all jurisdictions in order to comply with GMA requirements to show land capacity for all housing needs.

Methodology

The methodology below is substantially drawn from Commerce's recommended methodology found on pp. 44-48 of the "Guidance for Updating Your Housing Element," with specific adjustments for Whatcom County.

- 1) Using Land Capacity Analysis for Permanent Housing and Employment spreadsheets, identify the total net developable residential acres in all zones that allow emergency housing and emergency shelter.² This is found on line 40 of the "Summary Tables" tab of each UGA's Land Capacity Analysis for Permanent Housing and Employment spreadsheet (except Bellingham), and represents developable acreage with critical areas and other deductions removed. In addition, as a local option, cities may include net acreage in commercial zones which allow emergency housing or emergency shelter.
- 2) Apply any adopted spacing or intensity requirements to the parcels in step 1 to identify the maximum number of potential sites where emergency housing would be allowed. This step should account for spacing around any existing emergency housing or shelters, as well as any hotel or motel sites identified for conversion to emergency housing. Depending on the required spacing and the number of sites identified, multiple configurations may be possible.

¹ Email from Laura Hodgson (laura.hodgson@commerce.wa.gov) received Wednesday, June 26, 2024

² Washington Department of Commerce's August 2023 "Guidance for Updating Your Housing Element," p. 46, states: "When completing an emergency housing LCA, land included in the general residential land capacity analysis may also be counted as land for the emergency housing LCA." Furthermore, footnote 59 on the same page states, in relation to the previous sentence: "This is allowed to avoid double-counting housing needs that would be accommodated if the jurisdiction were successful at providing for all permanent housing needs."

- 3) Use assumptions about what type of emergency housing and/or emergency shelters are likely to be developed in the jurisdiction and perform a capacity analysis of the sites identified in step 1 based on probable development typologies that may be used.
 - First, jurisdictions should develop density assumptions (beds per acre) that do not exceed adopted occupancy or intensity standards based on:
 - Allowed densities for hotels and motels in their local jurisdiction,
 - Densities achieved by existing emergency housing or shelters in the local region, and/or
 - A density or mix of emergency housing densities based on likely emergency housing or emergency shelter typologies in the jurisdiction, drawn from Commerce guidance, data from the Whatcom County Health Department, and other local data sources as appropriate, such as cities' current inventories of emergency housing and shelter facilities.
 - Based on a combination of emergency housing typologies and densities or a single density assumption of the most likely emergency housing or emergency shelter typology for the community (e.g., converted hotel or motel, congregate shelter, etc.), determine the number of emergency beds or units possible on each site.
 - Optionally, to calculate capacity for emergency shelter in Religious Institutions, calculate the total parcel acreage of religious institutions, using GIS. Multiply this number by the assumed density of emergency shelter in religious institutions provided in the spreadsheet, drawn from examples provided by the Whatcom County Health Department. Since only some religious institutions would be assumed to provide emergency housing or emergency shelter capacity, count only 20 percent of this resulting bed count towards emergency housing or emergency shelter capacity.³
 - Add the total bed count of any pending emergency housing or emergency shelter under construction or in the development pipeline.
- 4) Add up the capacity from all available sites identified in step 3.
- 5) At the end of this calculation, document the capacity for emergency shelter and emergency housing in the jurisdiction compared to the allocated emergency housing need. If the capacity for emergency shelter and emergency housing does not meet or exceed that portion of the jurisdiction's allocated emergency housing need, regulations will need to be amended to allow sufficient capacity and steps 1-4 will need to be repeated with the new regulations to show capacity.

³ Per communication with the Whatcom County Health Department by email on April 4, 2025, there are not existing examples of emergency shelter in religious institutions in rural areas (outside of UGAs) at present. Therefore, a density assumption was developed based on the Interfaith Coalition, in a suburban area of Bellingham.