

EXHIBIT A

Whatcom County Comprehensive Plan Amendments – Appendices

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Appendix A Glossary

2080 Climate Scenario- forecasted extent of 3.3 feet of sea level rise plus the 20-year coastal storm and 1.75 times the magnitude of current 100-year Nooksack River flood and 1.5 times the magnitude of current 100-year Sumas River flood. These riverine scenarios correspond with roughly a 1 percent chance of being met or exceeded by the 2080s, with the likelihood increasing in the following decades. The coastal scenario has a 7 percent chance of being met or exceeded by the 2100s. See Chapter 12- Climate Element Map 12-3, "Whatcom County Roads Forecasted Impacts."

Act: The State of Washington's Growth Management Act.

Accessory Dwelling Unit (ADU): A smaller, independent residential dwelling unit located on the same lot as a stand-alone (i.e., detached) single-family home. ADUs go by many different names, including accessory apartments, secondary suites, and granny flats. ADUs can be converted portions of existing homes (i.e., internal ADUs), additions to new or existing homes with at least one shared wall (i.e., attached ADUs), or new stand-alone (i.e., no shared walls) accessory structures or converted portions of existing stand-alone accessory structures (i.e., detached ADUs) per WCC [20.97.010](#).

Active Transportation: Forms of pedestrian mobility including walking or running, the use of a mobility assistive device such as a wheelchair, bicycling and cycling irrespective of the number of wheels, and the use of small personal devices such as foot scooters or skateboards. Active transportation includes both traditional and electric pedal assist bicycles and other devices. Planning for active transportation must consider and address accommodation pursuant to the Americans with Disabilities Act (U.S.C. Title 42, 1990 as amended) and the distinct needs of each form of active transportation per RCW [36.70A.030](#)(1).

Active Transportation Facilities: Per WAC 365-196-200(2), facilities provided for the safety and mobility of active transportation users including, but not limited to, trails, as defined in RCW 47.30.005, sidewalks, bike lanes, shared-use paths, and other facilities in the public right-of-way.

Affordable Housing: Residential housing for rental occupancy which, as long as the same is occupied by low-income households, requires payment of monthly housing costs, including utilities other than telephone, of no more than thirty percent of the household's income per RCW [43.185A.010](#).

Agricultural Land: Land primarily devoted to the commercial production of horticultural, viticultural, floricultural, dairy, apiary, vegetable, or animal products or of berries, grain, hay, straw, turf, seed, Christmas trees not subject to the excise tax imposed by RCW 84.33.100 through 84.33.140, finfish in upland hatcheries, or livestock, and that has long-term commercial significance for agricultural production. (RCW 36.70A.030(2))

Agriculture Protection Overlay (APO): Soils determined by Whatcom County, in consultation with the Natural Resource Conservation Service and local farmers, as being the best soils for farming as identified within WCC [20.38.040](#).

Agrivoltaics: The use of land for both agriculture and solar photovoltaic energy generation (United States Department of Agriculture (USDA), n.d.)

Alluvial Fan: A fan-shaped deposit of sediment and organic debris formed where a stream flows or has flowed out of a mountainous upland onto a level plain or valley floor.

Americans with Disabilities Act (ADA): Is a [federal civil rights law](#) that prohibits discrimination against people with disabilities in everyday activities.

Annexation: The act of incorporating an area into the domain of a city.

Aquifer: A geologic formation, group of formations, or part of a formation capable of yielding a significant amount of groundwater to wells or springs. (WAC 173-160)

Area Median Income (AMI): The midpoint of a specific area's income distribution, meaning 50% of households in the area have higher income and 50% of households have lower income; calculated on an annual basis by the Department of Housing and Urban Development, and is often used in determining if households qualify for various housing programs. ([Opportunity Council](#)).

Associate Development Organization (ADO): A local organization working on economic development on behalf of the Washington State Department of Commerce. (Port of Bellingham).

Battery Energy Storage Systems: An energy storage system that can store and deploy generated energy as defined within WCC [20.97.020](#).

Best Available Science (BAS): The most reliable and available scientific information, most often used in the context of local government compliance with the State Growth Management Act (RCW [36.70A.172](#)) for developing policies and development regulations to increase climate resilience, reduce greenhouse gas emissions, and to protect the functions and values of critical areas (Chapter [365-195](#) WAC).

Broadband Service: Any service providing advanced telecommunications capability and internet access with transmission speeds that, at a minimum, provide 100 megabits per second download and 20 megabits per second upload per RCW [43.330.530](#)(4).

Building Intensities: Development variables such as lot coverage, building height, and the spacing between buildings and property lines and between buildings and other structures.

Built Environment: Elements of the environment developed by humans, including land uses, transportation systems, and public services and utilities.

Bus Rapid Transit: A fixed route bus system that features assets indicating permanent, high capacity service including, but not limited to, elevated platforms or enhanced stations, off-board fare collection, dedicated lanes, busways, or transit signal priority per RCW [36.70A.200](#)(d)(i).

Capital Facilities Plan: A required element of the Comprehensive Plan designed to form a better match between development and provision of services. It must include an inventory of existing facilities, forecast of future needs and a six-year financing plan.

Carbon Sequestration: Is the process of capturing and storing atmospheric carbon dioxide. Biologic carbon sequestration refers to storage of atmospheric carbon in vegetation, soils, woody products, and aquatic environments. Geologic carbon sequestration is the process of storing carbon dioxide (CO₂) in underground geologic formations (WSDOC, “*Climate Element Planning Guidance*”, December, 2025).

Clean Energy Coordinated Permitting Process: A WA State DOE, optional, fully coordinated permit process to help make the process for siting and permitting clean energy projects more effective and efficient as governed under RCW [43.158](#). (WSDOE “Clean Energy Coordinated Permitting Process”).

Climate Adaptation: The process of adjusting to new conditions in order to reduce risks to valued assets (WSDOC, “*Climate Element Planning Guidance*”, December, 2025).

Climate Change: Changes in average weather conditions that persist over multiple decades or longer. Climate change encompasses both increases and decreases in temperature, as well as shifts in precipitation, changes in frequency and location of severe weather events, and changes to other features of the climate system (USGCRP, 2023: Fifth National Climate Assessment).

Climate Element Sector: Per WAC 365-196-060(9), categories of natural resources or community assets (such as physical buildings, infrastructure, and historic places) that can be impacted by or contribute to climate change. The following climate element sectors are defined as follows:

- (a) Agriculture and Food Systems includes food production and distribution; including processing in industrial areas and community gardens in urban areas;
- (b) Built Environment and Energy includes power generation, transmission, and consumption in buildings and the built environment; this excludes transportation infrastructure;
- (c) Cultural Resources and Practices includes historic sites and cultural resources and practices;
- (d) Economic Development includes business continuity and opportunities;
- (e) Emergency Management includes emergency mitigation, preparedness, response, and recovery;
- (f) Health and Well-Being includes public health and community well-being;
- (g) Ecosystems includes terrestrial and aquatic species, critical areas, and ecosystem services;
- (h) Transportation includes transportation modes and infrastructure (such as, vehicles, roads, bridges, streetlights, sidewalks, bike lanes);
- (i) Waste Management includes materials recycling and disposal;
- (j) Water Resources includes water quality and quantity; and
- (k) Zoning includes regulations for the land that is designated into areas (or zones), each with specific rules defining what types of development (for

example, residential, commercial, and (for example, regulations describing height, bulk, use, and density).

Climate Impact: The consequences of realized risks on natural and human systems, where risks result from the interactions of climate-related hazards (including extreme weather/ climate events), exposure, and vulnerability. Impacts generally refer to effects on lives, livelihoods, health and well-being; ecosystems and species; economic, social, and cultural assets; services (including ecosystem services); and infrastructure (USGCRP, 2023: Fifth National Climate Assessment).

Climate Measure: A goal or policy that can increase resilience to climate change impacts or reduce greenhouse gas emissions or does both per WAC 365-196-060(7).

Climate Resilience: The ongoing process of anticipating, preparing for, and adapting to changes in climate and minimizing negative impacts to our natural systems, infrastructure, and communities as defined within RCW [70A.65.010](#)(16).

Climate Vulnerability: The degree to which physical, biological, and socioeconomic systems are susceptible to and unable to cope with adverse impacts of climate change (USGCRP, 2023: Fifth National Climate Assessment).

Cluster Development: Cluster Development provides the flexibility to maintain open space and plan around distinctive site features or constraints. Clustering development on smaller lots than conventional development creates a reserve tract, while maintaining the same overall density. As a result, a reserve tract is created, while maintaining the same overall density.

Co-Living Housing: A residential development with sleeping units that are independently rented and lockable and provide living and sleeping space, and residents share kitchen facilities with other sleeping units in the building. Local governments may use other names to refer to co-living housing including, but not limited to, congregate living facilities, single room occupancy, rooming house, boarding house, lodging house, and residential suites per RCW [36.70A.535](#)(11)(a).

Community Facility: A group care facility operated for the care of juveniles committed to the department under RCW [13.40.185](#). A county detention facility that houses juveniles committed to the department under RCW [13.40.185](#) pursuant to a contract with the department is not a community facility per RCW [72.05.020](#)(1).

Commute Trip: Trips made from a worker's home to a worksite during the peak period of 6:00 a.m. to 9:00 a.m. on weekdays per RCW [70A.15.4010](#)(5).

Compatible: Capable of existing together in harmony (as distinguished from "identical").

Compensation: Something given or received as an equivalent for services, debt, loss, injury, etc.

Comprehensive Plan: An integrated policy planning document designed to guide land use decisions, including the designation of urban growth areas, based on a consideration of land use alternatives, likely impacts, and possible mitigating measures.

Conditional Use: A use permitted only after public review and approved by the Hearing Examiner, and to which special conditions may be attached by the Hearing Examiner. (Whatcom County Zoning Code 20.97.075)

Conservation Easement Program (CEP): A Whatcom County voluntary program that compensates property owners for the value of their unused development rights and protects the land through the placement of permanent conservation easements.

Countywide Planning Policies (CWPP): Required by GMA, the County Council and the City Councils of all the cities adopted a set of policies, which embody a vision for the future of Whatcom County. It is a framework intended to guide the development of comprehensive plans for each jurisdiction in the county.

Critical Areas: As defined by each jurisdiction, including at least the following areas and ecosystems: (a) wetlands; (b) areas with a critical recharging effect on aquifers used for potable water; (c) fish and wildlife habitat conservation areas; (d) frequently flooded areas; and (e) geologically hazardous areas.

Critical Facilities: As defined in the Whatcom County Critical Areas Ordinance means buildings and other structures that are intended to remain operational in the event of extreme environmental loading from flood, wind, snow, volcanic activities, or earthquakes pursuant to the most current International Building Code (IBC).

Current-use Taxation: Taxing farm and forest lands under their current use, instead of at the higher rate appropriate to lands available for development.

Decarbonization: Human actions to reduce carbon dioxide emissions from human activities (USGCRP, 2023: Fifth National Climate Assessment).

Density: A measure of the intensity of development, generally expressed in terms of dwelling units per acre. It can also be expressed in terms of population density (people per acre).

Density Transfer: See "transfer of development rights."

Designated Forestland: Synonymous with "Forestland", is any parcel of land that is five or more acres or multiple parcels of land that are contiguous and total five or more acres that is or are devoted primarily to growing and harvesting timber as defined within RCW [84.33.035\(5\)](#).

Development: Any activity that requires federal, state, or local approval for the use or modification of land or its resource. These activities include, but are not limited to, subdivisions and short subdivisions, binding site plans, planned unit developments, variances, shoreline substantial development, clearing activity, excavation, embankment, fill and grade work, activity conditionally allowed, building or construction, revocable encroachment permits, and septic approval.

Disabilities, Persons with: The Americans with Disabilities Act (ADA) defines an individual with a disability as a person with a physical or mental impairment that substantially limits one or more major life activities, a person with a history or record of such an impairment, or a person perceived by others as having such an impairment.

Distribution Pipeline: Means a pipeline other than a gathering or transmission line or as defined at 49 CFR 192.3, if amended.

Downzone: Reclassification from the current zone designation to one where the density of permitted development is lower.

Drought: An exceptional period of water shortage for existing ecosystems and the human population (due to low rainfall, high temperature and/ or wind) (USGCRP, 2023: Fifth National Climate Assessment).

Easement: The right, privilege, or interest that one party has in the land of another. (Dictionary of Real Estate Terms)

Economic Development Investments (EDI) Program: Synonymous with "Rural Sales Tax Program" is a program which authorizes Whatcom County to retain a portion of sales and use tax to finance public facilities, including affordable housing projects, as authorized under RCW [82.14.370](#).

Emergency Housing: Temporary indoor accommodations for individuals or families who are homeless or at imminent risk of becoming homeless that is intended to address the basic health, food, clothing, and personal hygiene needs of individuals or families per RCW [36.70A.030](#)(15).

Emergency Shelter: A facility that provides a temporary shelter for individuals or families who are currently homeless per RCW [36.70A.030](#)(16).

Emissions Scenarios: Quantitative illustrations of how the release of different amounts of climate-altering gases and aerosols into the atmosphere from human and natural sources will produce different future climate conditions. Scenarios are developed using a wide range of assumptions about population growth, economic, and technological development, and other factors (USGCRP, 2023: Fifth National Climate Assessment).

Enhancement: actions performed within an existing degraded shoreline, critical area, and/or buffer to intentionally increase or augment one or more functions or values of the existing area. Enhancement actions include, but are not limited to, increasing plant diversity and cover, increasing wildlife habitat and structural complexity (snags, woody debris), installing environmentally compatible erosion controls, or removing nonindigenous plant or animal species. *From WCC 23.60.050(F)*.

Environmental Justice: The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to development, implementation, and enforcement of environmental laws, regulations, and policies. Environmental justice includes addressing disproportionate environmental and health impacts in all laws, rules, and policies with environmental impacts by prioritizing vulnerable populations and overburdened communities and the equitable distribution of resources and benefits as defined within RCW [36.70A.030](#)(17).

Essential Public Facility: Those facilities that are typically difficult to site, such as airports, state education facilities and state or regional transportation facilities as defined in RCW [47.06.140](#), regional transit authority facilities as defined in RCW

[81.112.020](#), improvements to high capacity transportation systems as defined in RCW 81.104.015, bus rapid transit routes and stops or improvements to such routes and stops, state and local correctional facilities, solid waste handling facilities, opioid treatment programs including both mobile and fixed-site medication units, recovery residences, harm reduction programs excluding safe injection sites, and inpatient facilities including substance use disorder treatment abuse facilities, mental health facilities, group homes, community facilities as defined in RCW [72.05.020](#), secure community transition facilities as defined in RCW [71.09.020](#), telecommunication towers, water treatment plants, sewer treatment plants, and water storage facilities per RCW [36.70A.200](#).

Essential State or Regional Transportation Facilities: The interstate highway system, interregional state principal arterials including ferry connections that serve statewide travel, intercity passenger rail services, intercity high-speed ground transportation, major passenger intermodal terminals, excluding all airport facilities and services, the freight railroad system, marine port facilities and services that are related solely to marine activities affecting international and interstate trade, and high-capacity transportation systems serving regions as defined in RCW 81.104.015.

Extreme Heat: Temperatures that are much hotter and or humid than average (USGCRP, 2023: Fifth National Climate Assessment).

Extreme Precipitation: An extreme or heavy precipitation event, which is of very high magnitude with a very rare occurrence at a particular place (USGCRP, 2023: Fifth National Climate Assessment).

Extremely Low-Income Households: A single person, family, or unrelated persons living together whose adjusted income is at or below 30 percent of the median household income adjusted for household size, for the county where the household is located, as reported by the United States department of housing and urban development per RCW [36.70A.030](#)(18).

Forest Land: Land primarily devoted to growing trees for long-term commercial timber production on land that can be economically and practically managed for such production, including Christmas trees subject to the excise tax imposed under RCW 84.33.100 through 84.33.140, and that has long-term commercial significance. In determining whether forest land is primarily devoted to growing trees for long-term commercial timber production on land that can be economically and practically managed for such production, the following factors shall be considered: (a) The proximity of the land to urban, suburban, and rural settlements; (b) surrounding parcel size and the compatibility and intensity of adjacent and nearby land uses; (c) long-term local economic conditions that affect the ability to manage for timber production; and (d) the availability of public facilities and services conducive to conversion of forest land to other uses. (RCW 36.70A.030(8))

Gathering Pipeline: Means a pipeline that transports gas from a current production facility to a transmission or main or as defined at 49 CFR 192.3, as amended.

General Aviation Airport: A facility where airplanes can take off and land that is publicly owned or privately owned but used by the public. It can include a terminal, hangers, refueling facilities, and other accessory uses. Aircraft landing areas used solely for personal use, agricultural use, forest management, or to serve the Eliza Island community are not general aviation airports. Airports used solely for commercial service or military use are not general aviation airports.

Geographic Information System (GIS): An automated or manual system capable of organizing, storing, analyzing, and retrieving geographically related (mapped) information. It is intended to support sound decision-making regarding the management of a community's resources. Increasingly, the term is applied to computerized systems which combine digital mapping with automated land use data files.

Greenbelts/Greenways: Undeveloped open space, natural areas, including agricultural lands, recreational lands, golf courses and other recreational uses, wildlife corridors, and other similar uses.

Green Infrastructure: A wide array of natural assets and built structures within an urban growth area boundary, including parks and other areas with protected tree canopy, and management practices at multiple scales that manage wet weather that maintain and restore natural hydrology by storing, infiltrating, evapotranspiring and using stormwater as defined within RCW [36.70A.030](#)(23) (WSDOC, "Climate Element Planning Guidance", December, 2025).

Green Space: As defined within RCW [36.70A.030](#)(24), an area of land vegetated by natural features such as grass, trees, or shrubs, within an urban context and less than one acre in size that creates public value through one or more of the following attributes:

- (a) Is accessible to the public;
- (b) Promotes physical and mental health of residents;
- (c) Provides relief from the urban heat island effects;
- (d) Promotes recreational and aesthetic values;
- (e) Protects streams or water supply;
- (f) Preserves visual quality along highway, road, or street corridors.

Greenhouse Gas: Carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and any other gas or gases designated by the Department of Ecology by rule per RCW 70A.45.010.

Greenhouse Gas (GHG) Emissions: Actions taken to reduce the emissions of greenhouse gases to reduce the rate of climate change (WSDOC, "Climate Element Planning Guidance", December, 2025).

Groundwaters: All waters that exist beneath the land surface or beneath the bed of any stream, lake or reservoir, or other body of surface water within the boundaries of this state, whatever may be the geological formation or structure in which such water stands or flows, percolates or otherwise moves. There is a recognized distinction between natural groundwater and artificially stored groundwater (RCW 90.44)

Group Home: A residence that is licensed by the state as either a boarding home or an adult family home.

Growth Management: A method to guide development in order to minimize adverse environmental and fiscal impacts and to maximize the health, safety, and welfare of the community.

Growth Management Act (GMA): State law requiring jurisdictions with certain projected growth rates to prepare a comprehensive land use plan (RCW 36.70A).

Hazard: The potential occurrence of a natural or human-induced physical event or trend that may cause loss of life, injury, or other health impacts, as well as damage and loss to property, infrastructure, livelihoods, service provision, ecosystems, and environmental resources (USGCRP, 2023: Fifth National Climate Assessment).

High Capacity Transportation Systems: A system of public transportation services within an urbanized region operating principally on exclusive rights-of-way, and the supporting services and facilities necessary to implement such a system, including interim express services and high occupancy vehicle lanes, which taken as a whole, provides a substantially higher level of passenger capacity, speed, and service frequency than traditional public transportation systems operating principally in general purpose roadways per RCW [81.104.015](#).

Historic Archaeological Resources: Those properties which are listed in or eligible for listing in the Washington state register of historic places (RCW [27.34.220](#)) or the national register of historic places as defined in the national historic preservation act of 1966 (Title 1, Sec. 101, Public Law 89-665; 80 Stat. 915; 16 U.S.C. Sec. 470) as now or hereafter amended per RCW [27.53.030](#)(9).

Home-Based Business: Per WCC [20.97.80](#), a commercial enterprise for which the principal administrative and managerial activities take place within an individual's personal residence. Home-based businesses must remain incidental to the residential use pursuant to the standards of WCC [20.80.970](#).

Impact/Mitigation Fee: A payment of money imposed upon new development as a condition of approval, as defined and provided by RCW 82.02 and/or 43.21c. This fee must be used exclusively to finance improvements in capital facilities that are necessitated by the development.

Inclusionary Zoning: Zoning that requires affordable units to be included within new residential development projects or requires payment for construction of such units elsewhere in the community (Butler, 2016).

Incompatible: Not capable of existing together in harmony.

Incorporated Area: Area inside city limits.

In-Fill: The practice of using developable land that lies within a city, UGA, or developed area outside resource lands, where services are available rather than passing over such parcels in favor of land farther out or farther from available services.

Infrastructure: Streets, water and sewer lines, and other public facilities basic and necessary to the functioning of an urban area.

In-Patient Facilities: Buildings and accessory uses primarily utilized to provide health care service or medical attention, care, or treatment that requires at least one overnight stay.

Interlocal Agreement: An agreement intended to apply within designated Urban Growth Areas to set clear and reasonable criteria for orderly annexations, including guidelines on size and timing of annexations and urban levels of development, appropriate development standards, and tax revenue sharing provisions. Participants in the agreement could include the county, any adjacent city, affected fire districts, (if applicable) and any other utility provider. (CWPP)

Land Capacity Analysis: A comparison between the collective effects of all development regulations operating on development and the assumed densities established in the land use element per WAC [365-196-325\(2\)\(a\)](#).

Level of service (LOS): An established minimum capacity of public facilities or services that must be provided per unit of demand or other appropriate measure of need. Level of service standards are synonymous with locally established minimum standards. (WAC 365-196-210) Level of service for transportation is usually expressed as a proportion derived by comparing a roadway's current volume to its capacity. For example, the level of service of a road segment is expressed by a declining letter scale ("A" is free-flowing traffic; "F" is a traffic jam). For most other facilities, the standard is units of the facility (i.e. acres of park land) per 1,000 people.

Local Improvement District (LID): A defined geographical area or special district set up by ordinance to finance streets, sewers, and other public improvements that directly benefit properties in the district. The improvements are paid by the benefited property owners over a period of time, usually 10 to 20 years.

Long-term Commercial Significance: Includes the growing capacity, productivity, and soil composition of the land for long-term commercial production, in consideration with the land's proximity to population areas, and the possibility of more intense uses of the land. (RCW 36.70A.030(10))

Low Impact Development: A stormwater and land use management strategy that strives to mimic pre-disturbance hydrologic processes of infiltration, filtration, storage, evaporation, and transpiration by emphasizing conservation and use of on-site natural features, site planning, and distributed stormwater management practices that are integrated into a project design. LID strategies can be applied to new development, urban retrofits, infrastructure improvements and revitalization projects to protect aquatic resources.

Low-Income Households: A single person, family, or unrelated persons living together whose adjusted income is at or below 80 percent of the median family income adjusted for family size, for the county, city, or metropolitan statistical area, where the project is located, as reported by the United States department of housing and urban development per RCW [84.14.010\(9\)](#).

Master Planned Resort: A self-contained and fully integrated planned unit development, in a setting of significant natural amenities, with primary focus on destination resort facilities, consisting of short-term visitor accommodations

associated with a range of developed on-site indoor or outdoor recreational facilities. A master planned resort may include other residential uses within its boundaries, if the residential uses are integrated into and support the on-site recreational nature of the resort.

Mineral Resource Land: Land primarily devoted to, or with the documented presence of and/or potential for, the long-term and commercially significant extraction of minerals such as precious metals, coal, sand, and gravel, etc.

Mitigation: Measures taken to avoid, minimize, or compensate for adverse environmental impacts associated with a project or non-project land use action.

Mixed-Use Development: A development project with a complementary mix of uses such as residential, retail, commercial, employment, civic and entertainment uses in close proximity, sometimes in the same building ([MRSC](#)).

Moderate-Income Households: A single person, family, or unrelated persons living together whose adjusted income is more than 80 percent but is at or below 115 percent of the median family income adjusted for family size, for the county, city, or metropolitan statistical area, where the project is located, as reported by the United States department of housing and urban development per RCW [84.14.010](#)(10).

Multimodal Level of Service (MMLOS): A performance and quality measure, metric, or criterion of transportation networks which assesses the quality of service for all users of a transportation system, including pedestrians, cyclists, transit riders, and drivers, used to ensure that transportation planning, particularly for comprehensive plans, considers the needs of all modes and is consistent with goals for environmental justice per RCW [36.70A.070](#)(6)(b).

Multimodal Transportation: Transportation systems that address the movement of people and goods through infrastructure and services for walking, biking, public transit, driving, ferries, and connecting with rail and aviation. These systems should provide safe, well-connected mobility options for people of all ages and abilities, including those who do not drive.

Natural Hazard: An environmental phenomenon that have the potential to impact societies and the human environment; not be confused with other types of hazards, such as manmade hazards. ([FEMA](#)).

Natural Resource Lands: Lands including agricultural, forestry, and mineral resource lands that are not already characterized by urban growth and that have long-term significance for the commercial production of food or other agricultural products, for the commercial production of timber, or that have long-term significance for the extraction of minerals.

Net-zero: A state in which a local jurisdiction's greenhouse gases going into the atmosphere are reduced to near-zero, or 95 percent below baseline levels by 2050, and the remaining greenhouse gases that cannot be eliminated are mitigated with carbon dioxide sequestration to bring total net emissions to zero (WSDOC, "Climate Element Planning Guidance", December, 2025).

New Fully-Contained Community: A development proposed for location outside of the existing designated urban growth areas, which is characterized by urban densities, uses, and services and meets the criteria of RCW 36.70A.350. (WAC 365-196-210) The criteria include new infrastructure, traffic demand management programs, buffers, a mix of uses, affordable housing, environmental protection, development regulations, mitigation of impacts on resource lands, and protection of critical areas.

Non-Compatible: See "Incompatible."

Nonconforming Use: A building or land occupied by a legally established use that does not conform with the regulations of the zoning district in which it is located. (Whatcom County Zoning Code 20.97.270)

Non-federal Land: The areas of Whatcom County not under federal management (i.e., the areas not included in the Mt. Baker National Forest or North Cascades National Park).

Nonpoint Source Pollution: Pollution that does not come from a single source ([WSDOE "Nonpoint Source Pollution"](#)).

North American Industry Classification System (NAICS): The standard used by the Federal agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy ([USCB](#)).

Opioid Treatment Programs: Mobile and fixed-site medication units, recovery residences, and harm reduction programs excluding safe injection sites. Harm reduction programs means programs that emphasize engaging directly with people who use drugs to prevent overdose and infectious disease transmission, improve the physical, mental, and social well-being of those served, and offer low threshold options for accessing substance use disorder treatment and other services per RCW [71.24.590](#).

One-number Locator Service (one-call): A service through which a person can notify utilities and request field marking of underground facilities.

Open Space: Any parcel or area of land or water not covered by structures, hard surfacing, parking areas and other impervious surfaces except for pedestrian or bicycle pathways, or where otherwise provided by this title or other county ordinance and set aside, dedicated, for active or passive recreation, visual enjoyment or critical area development buffers, as established in the Whatcom County Critical Areas Ordinance. For properties within the jurisdiction of the Shoreline Management Program (WCC Title [23](#)), submerged lands and/or tidelands within the boundaries of any waterfront parcel that are located waterward of the ordinary high water mark shall not be used in open space calculations per WCC 20.97.150.

Open Space Corridor: Per RCW [36.70A.030](#), land that is designated and maintained for recreational purposes, wildlife habitat, trail systems, and the connectivity of critical areas as defined in RCW 36.70A.030, and that is not limited or restricted to agricultural or forest use or management.

Open Space Land: Per RCW 84.34.020(1), any land area so designated by an official comprehensive land use plan adopted by any city or county and zoned accordingly, or any land area, the preservation of which in its present use would:

- (i) conserve and enhance natural or scenic resources;
- (ii) protect streams or water supply;
- (iii) promote conservation of soils, wetlands, beaches or tidal marshes;
- (iv) enhance the value to the public of abutting or neighboring parks, forests, wildlife preserves, nature reservations or sanctuaries or other open space;
- (v) enhance recreation opportunities;
- (vi) preserve historic sites;
- (vii) preserve visual quality along highway, road, and street corridors or scenic vistas;
- (viii) retain in its natural state tracts of land not less than one acre situated in an urban area and open to public use on such conditions as may be reasonably required by the legislative body granting the open space classification; or any land meeting the definition of farm and agricultural conservation land under RCW 84.34.020(8).

Overburdened Communities: Per RCW [70A.02.010](#)(11), a geographic area where vulnerable populations face combined, multiple environmental harms and health impacts, and includes, but is not limited to, highly impacted communities as defined in RCW [19.405.020](#).

Paratransit: Arrangements in which people with special transportation needs, and their attendants, if any, are transported by modes identified within RCW 46.74.010 ([WSDOR](#)).

Parcel: With regard to the agricultural protection zone, a parcel is defined as contiguous land held in the same ownership but without regard for segregation made for tax purposes. To be contiguous the land must share a common boundary on at least one side. Land is not a contiguous parcel if bisected by a public right-of-way, a Category I stream or a Category 1 or 2 wetland, or divided as part of a subdivision or exempt land division approved pursuant to Chapter 58.17 RCW or Title 21 Whatcom County Code or created after 1959 or created as a legal lot of record.

Per Capita Vehicle Miles Traveled: The number of miles traveled using cars and light trucks in a calendar year divided by the number of residents. The calculation of this value excludes vehicle miles driven conveying freight (WSDOC, “*Climate Element Planning Guidance*”, December, 2025).

Permanent Supportive Housing: Subsidized, leased housing with no limit on length of stay that prioritizes people who need comprehensive support services to retain tenancy and utilizes admissions practices designed to use lower barriers to entry than would be typical for other subsidized or unsubsidized rental housing, especially related to rental history, criminal history, and personal behaviors per RCW [36.70A.030](#)(33).

Plat: A detailed drawing of a land subdivision, recorded with the county. Along with the property lines, it may include notations of easements, rights, and restrictions.

Point Source Pollution: Synonymous with “Point Source Discharge”, any single identifiable source of pollution from which pollutants are discharged, such as a pipe, ditch, ship or factory smokestack as defined by the U.S. Environmental Protection Agency ([NOA](#)).

Potable: Water that is suitable for drinking by the public. (WAC 246-290)

Productive: Capable of economically producing resource-based goods such as mineral, timber, fiber, or food products.

Private Utilities: Water and/or sewer service owned and operated by an entity other than a political subdivision of the federal, state or tribal governments.

Public Benefit Rating System (PBRs): A tool used by the Whatcom County Open Space Current Use Program, which evaluates properties to determine eligibility and the amount of property tax reduction which can be received for retaining land as open space.

Public Utilities: Water and/or sewer services owned and operated by a political subdivision of federal, state or tribal governments (includes water and sewer districts and public utility districts).

Recreation Resource Management Areas: Large undeveloped parcels with unique or attractive features where public access is maintained and unique scenic areas preserved through public ownership or private easements.

Regional Transit Authority Facilities: Any lands, interests in land, air rights over lands, and improvements thereto, including but not limited to vessel terminals, equipment, vehicles, vessels, trains, stations, designated passenger waiting areas, and other components necessary to support and operate a regional transit system under the jurisdiction of a regional transit authority per RCW [81.112.020](#).

Regional Transportation Planning Organization: An organization created by the Growth Management Act to coordinate regional transportation efforts and to foster cooperation among state and local jurisdictions. The Whatcom Council of Governments has been designated as the Regional Transportation Planning Organization for Whatcom County.

Renewable Hydrogen: Hydrogen produced using renewable resources both as the source for the hydrogen and the source for the energy input into the production process per RCW [54.04.190](#)(6)(c).

Resource Based Industry: A business or industry that has a direct relationship to natural resources such as agriculture, minerals, forestry, fishing and aquaculture. This type of industry is generally located in close proximity to the resource or resource land.

Restoration: Bringing back into existence the natural functions and aesthetic character of a site, including the integrity of its surficial geology, topography, soils, hydrology, and/or vegetative regime. Within the context of threatened and endangered species goals and policies, restore or restoration means an action that improves habitat of threatened and endangered species that is:

- a. Undertaken voluntarily by the landowner; or

- b. Undertaken voluntarily by the County on county property or right-of-way, in accordance with the goals and policies of the comprehensive plan; or
- c. Undertaken as a condition of a permit when the condition has been imposed pursuant to adopted regulations and there is a nexus between new development or new clearing activity and the required restoration.

Rezone: Reclassification of an area from its current zoning to a different use.

Ride Sharing: Synonymous with Rideshare Service, a carpool or vanpool arrangement whereby one or more groups not exceeding 15 persons each including the drivers, and not fewer than three persons including the drivers are transported in a passenger motor vehicle with a gross vehicle weight not exceeding 10,000 pounds per RCW [46.74.010](#)(2).

Right-of-way (ROW): A recorded right to use or travel over a specified area or strip of land. Most commonly it refers to land on which a street, sidewalk, or railroad is located. It can also be occupied by utilities, transmission lines, oil or gas pipelines, drainageways, or similar facilities, although pathways for these facilities are more commonly referred to as easements.

Rural lands: All lands which are not within an urban growth area and are not designated as natural resource lands having long-term commercial significance for production of agricultural products, timber, or the extraction of minerals. (WAC 365-196-210)

Rural Study Areas (RSA): Lands within Whatcom County's Rural Zoning District, which are commercially farmed and have many of the characteristics of farmlands in the Agriculture Zoning District, and meet many of the GMA criteria for "Agricultural Lands of Long-Term Commercial Significance".

Safe Systems Approach: An internationally recognized holistic and proactive approach to road safety intended to systematically reduce fatal and serious injury crash potential per RCW [47.04.010](#)(36).

Sea Level Rise: An increase to the height of sea level, both globally and locally (relative sea level change) due to a change in ocean volume as a result of a change in the mass of water in the ocean (e.g. due to melt of glaciers and ice sheets), changes in ocean volume as a result of changes in ocean water density (e.g., expansion under warmer conditions), changes in the shape of ocean basins and changes in Earth's gravitational and rotational fields, as well as local subsidence or uplift of the land (USGCRP, 2023: Fifth National Climate Assessment).

Severe Storm: An atmospheric disturbance that may include any or a combination of the following: strong winds, large hail, thunderstorms, lightning, tornadoes, rain, snow or other mixed precipitation as defined by Washington State Emergency Management Division ([WSEMD](#)).

State Environmental Policy Act (SEPA): 1971 state law paralleling the National Environmental Policy Act (NEPA), which requires state and local agencies to consider environmental impacts in the decision-making process. A determination of environmental significance must be made for all non-exempt projects or actions which require a permit, license, or decision from a government agency. If the action

does not have significant adverse environmental impacts, a Declaration of Non-Significance is issued. If the action or project could have major impacts, an Environmental Impact Statement is required. SEPA requires consideration of alternatives and mitigation of environmental impacts for major public and private projects and programs.

Sprawl: Low-density development unfolding from the edges of cities and towns. It is unplanned, land-consumptive, automobile-oriented, and designed without attention to its surroundings.

Subarea: A geographic division of the county, created for planning purposes. There are ten subareas in Whatcom County.

Subdivision: Division of a lot, tract, or parcel of land into two or more lots, tracts, parcels, or other divisions of land for sale or development. (Black's Law Dictionary)

Sustainable: The ability to maintain or continue a process, system, or resource usage at a steady level, balancing long-term environmental, social, and economic needs and not depleting or damaging the environment or natural resources, ensuring they remain available for future generations.

Telecommunications Systems: Structured cabling systems that begin at the demarcation point between the local service provider and the customer's premises structured cabling system or the wiring, appliances, devices, or equipment as specified by rule of the department as defined within RCW [19.28.400](#)(13).

Third-party Damage: Means damage caused by a party other than the owner/operator of a utility facility or a contractor working for such owner/operator.

Title 20: Whatcom County Zoning Code.

Tiny Home: Synonymous with "Tiny House", a dwelling unit that is 400 square feet or less in floor area (excluding sleeping lofts) as defined within WCC [20.97.200](#).

Total Maximum Daily Load (TMDL): Is a numerical value, used by WA State DOE, which represents the highest amount of a pollutant a surface water body can receive and still meet State standards ([WSDOE "TMDL"](#)).

Transfer of Development Rights (TDR): A program in which the unused portion of a "sending" property's zoned capacity, one of the separable rights of property, is sold to the developer of a "receiving" site, who is allowed to add the capacity to the zoned limit of that site. TDRs can be used to prevent the demolition of affordable housing units, especially in downtowns, or to protect historically significant property or open space.

Transit Oriented Development (TOD): A type of land development that maximizes the amount of residential, commercial and activity space near public transportation ([WSDOC "TOD"](#)).

Transmission Pipeline: Means a natural gas or hazardous liquid pipeline that transports within a storage field, or transports from an interstate pipeline or storage facility to a distribution main or a large volume user, or operates at a hoop stress of twenty percent or more of the specified minimum yield strength or as defined at 40 CRF 192.3, as amended.

Transportation Analysis Zone (TAZ): Geographic area defined for transportation modeling purposes. (COG, 1996)

Transportation System: All transportation infrastructure and services for all forms of transportation within a geographic area, irrespective of the responsible jurisdiction or transportation provider.

Tree Canopy: The layer of leaves, branches, and stems of trees that cover the ground when viewed from above and that can be measured as a percentage of land area shaded by trees, as defined within RCW 76.15.010.

Unincorporated Area: Area of the county outside city limits.

Urban Fringe Subarea Plan: A plan pertaining to the Bellingham Urban Growth Area and a portion of Whatcom County surrounding Bellingham and designating the interface between urban and rural land uses. Part of the Urban Fringe Area is included in an Urban Growth Area. Some of the area already lies within Bellingham's Urban Service Area.

Urban Growth: growth that makes intensive use of land for the location of buildings, structures, and impermeable surfaces to such a degree as to be incompatible with the primary use of land for the production of food, other agricultural products, or fiber, or the extraction of mineral resources, rural uses, rural development, and natural resource lands designated pursuant to RCW 36.70A.170.

Urban Growth Area (UGA): An area designated, within which urban growth will be encouraged and outside of which growth can only occur if it is not urban in nature. Urban growth areas around cities are designated by the county in consultation with the cities; urban growth areas not associated with cities are designated by the county.

Urban Growth Area Reserves: Areas adjacent and contiguous to Urban Growth Areas which appear to be suitable for future inclusion of the respective Urban Growth Area. These lands are held in reserve until it is demonstrated that they are needed for urban growth, and that consideration is given to ensuring adequate public facilities and services, reduction of sprawl, economic development, open space corridors, and natural resource conservation.

Urban Level of Service: The minimum level of facilities and services, including sanitary sewer, water service, police protection, fire protection and emergency medical services, parks and recreation programs, solid waste management, electric service, land use controls, communication facilities, and public schools, to support urban levels of development. A full range of services would add urban public transit, natural gas, storm drainage facilities, street lighting, libraries, local parks, local recreation facilities and services, and health services.

Utility Corridor: Means an area where an existing utility transmission line is situated, which includes the right-of-way occupied by the existing line and areas immediately adjacent to such rights-of-way in which siting additional utility transmission lines could potentially be considered appropriate.

Very-Low Income: Synonymous with “Very-Low Income Household”, is a person or household whose income is at or below fifty percent of the median family income, adjusted for household size, for the county where the household is located per RCW [50.72.020\(6\)](#).

Vehicle Miles Traveled (VMT): The total annual miles of vehicle travel divided by the total population in a state or in an urbanized area per U.S. Department of Transportation.

Visioning: A process of citizen involvement to determine values and ideals for the future of a community and to transform those values and ideals into manageable and feasible community goals. (WAC 365-196-210)

Vulnerable Populations: Population groups that are more likely to be at higher risk for poor health outcomes in response to environmental harms, due to:

- (i) Adverse socioeconomic factors, such as unemployment, high housing and transportation costs relative to income, limited access to nutritious food and adequate health care, linguistic isolation, and other factors that negatively affect health outcomes and increase vulnerability to the effects of environmental harms; and
- (ii) Sensitivity factors, such as low birth weight and higher rates of hospitalization.

Vulnerable populations include, but is not limited to:

- (i) Racial or ethnic minorities;
- (ii) Low-income populations; and
- (iii) Populations disproportionately impacted by environmental harms as defined within RCW [70A.02.010\(14\)](#).

Water Association: A private corporation which distributes potable water to residential customers.

Water Rights Adjudication: The legal process to quantify and prioritize water use, with highest priority given to the oldest, continuous water use per [RCW 90.03](#).

Watershed: A geographic region within which water drains into a particular river, stream, or body of water.

Wetlands Mitigation Bank: A site where wetlands are restored, created, enhanced, or in exceptional circumstances, preserved expressly for the purpose of providing compensatory mitigation in advance of authorized impacts to similar resources per RCW [90.84.010\(5\)](#).

Wildland Fire Hazard: Per RCW [76.04.005\(1\)](#), a condition existing on any land in the state:

- (a) Covered wholly or in part by forest debris which is likely to further the spread of fire and thereby endanger life or property; or
- (b) When, due to the effects of disturbance agents, broken, down, dead, or dying trees exist on forestland in sufficient quantity to be likely to further the spread of fire within areas covered by a forest health hazard warning or order issued by the commissioner of public lands under RCW [76.06.180](#).

Wildland Urban Interface: The geographical area where structures and other human development meets or intermingles with wildland vegetative fuels.

Wildfire: Fire originating from an unplanned ignition, such as lightning, volcanos, unauthorized and accidental human-caused fires, and prescribes fires that are declared wildfires.

WUTC: Is a common abbreviation to refer to the Washington Utilities and Transportation Commission.

Zoning: A measure by which the community is divided up into districts or zones. In each zone there are permitted uses and special uses, as well as regulations governing lot size, building bulk, placement, and other development standards.

Appendix B List of Acronyms

AAC	Agricultural Advisory Committee
AAGR	Annual Average Growth Rate
ADA	Americans with Disabilities Act
ADO	Associate Development Organization
ADU	Accessory Dwelling Unit
AG	Agricultural zone
ALA	Agricultural Land Assessment
AMI	Area Median Income
APO	Agriculture Protection Overlay
ARL	Agricultural Resource Land
ATN	Active Transportation Network
BAS	Best Available Science
BMP	Best Management Practices
BNSF	Burlington Northern Santa Fe Railway
BR&E	Business Retention & Expansion
CARA	Critical Aquifer Recharge Area
CDBG	Community Development Block Grant
CEDS	Comprehensive Economic Development Strategy
CEP	Conservation Easement Program
CERB	Community Economic Revitalization Board
CETA	Clean Energy Transformation Act
CF	Commercial Forestry zone
CFHMP	Comprehensive Flood Hazard Management Plan
CFP	Capital Facilities Plan
CFR	Code of Federal Regulations
CHAS	HUD Comprehensive Housing Affordability Strategy
CIG	Climate Impacts Group
CIP	Capital Improvement Program

C-PACER	Whatcom County Commercial Property Assessed Clean Energy and Resilience Program
CPAR MP	Cherry Point Aquatic Reserve Management Plan
CPROS	Comprehensive Parks, Recreation and Open Space Plan
CREP	Conservation Reserve Enhancement Program
CTAC	Citizens' Transportation Advisory Committee
CWPP	Countywide Planning Policies
CWSSA	Critical Water Supply Service Area
CWSP	Whatcom County Coordinated Water System Plan
DAHP	Washington State Department of Archaeology & Historic Preservation
DFL	Designated Forest Land
DNL	Day Night Average Sound Level
DNR	Washington State Department of Natural Resources
DOC	Department of Corrections
DOE	Washington State Department of Ecology or US Department of Energy
DUI	Driving under the influence
EDA	Economic Development Administration
EDB	Ethylene Dibromide
EDI	Whatcom County Economic Development Investment Board
EDI Program	Economic Development Initiative/Rural Sales Tax Program
EIS	Environmental impact statement
EMF	Electromagnetic field
EPA	United States Environmental Protection Agency
EPF	Essential Public Facilities
ESA	Endangered Species Act
ESD	Washington State Employee Security Department
ESU	Evolutionarily Significant Unit
EV	Electric Vehicle
FCZD	Flood Control Zone District
FCZDAC	Flood Control Zone District Advisory Committee

FEMA	Federal Emergency Management Agency
FERC	Federal Energy Regulatory Commission
FFA	Frequently Flooded Area
FLIP	Floodplain Integrated Planning
FTE	Full Time Employee
GC	General Commercial zone
GHG	Greenhouse Gas
GIS	Geographic Information System
GM	General Manufacturing zone
GMA	Growth Management Act
HAMFI	HUD Average Median Family Income
HAPT	HUD Housing for All Planning Tool
HCA	Habitat Conservation Area
HEAL	Washington State Healthy Environmental for All Act
HII	Heavy Impact Industrial zone
HRS	Highways of Regional Significance
HSS	Highways of Statewide Significance
HUD	United States Department of Housing and Urban Development
I-5	Interstate-5 (north-south freeway)
LAMIRD	Limited Areas of More Intensive Rural Development
LCA	Land Capacity Analysis
LEED	Leadership in Energy and Environmental Design
LESA	Land Evaluation and Site Assessment
LID	Local improvement district
LII	Light Impact Industrial zone
L&I	Washington State Department of Labor and Industries
LMI	Low to Moderate-Income
LOS	Level of service
LOSS	Large On-Site Sewage System
LWD	Large Woody Debris
MMLOS	Multimodal Level of Service
MOA	Memorandum of Agreement

MPO	Metropolitan Planning Organization
MRC	Marine Resources Committee
MRL	Mineral Resource Land
MRO	Mineral Resource Overlay
MTCO2e	Metric tons of Carbon Dioxide Equivalent
MW	Megawatt
NAICS	North American Industry Classification System
NC	Neighborhood Commercial zone
NFIP	National Flood Insurance Program
NPDES	National Pollutant Discharge Elimination System
NPSP	Nonpoint Source Pollution
NRCS	Natural Resources Conservation Service
OFM	Washington State Office of Financial Management
ORV	Off-road vehicle
OSAG	Open Space Farm and Agriculture
OSL	Open Space Land
OSS	Onsite Sewage System
PBRs	Public Benefit Rating System
PIC	Whatcom County Pollution, Identification and Correction Program
PSH	Permanent Supportive Housing
PUD	Public utility district
R	Rural zone
RC	Resort Commercial zone
RCW	Revised Code of Washington
RF	Rural Forestry zone
ROW	Right-of-Way
RR	Residential Rural zone
RR R/W	Rail Road Right of Way
RRI	Rural Residential-Island zone
RRMA	Recreation Resource Management Area
RSA	Rural Study Area
RTPO	Regional Transportation Planning Organization

RV	Recreational vehicle
R2A	Rural zone (1 dwelling per 2 acres)
R5A	Rural zone (1 dwelling per 5 acres)
R10A	Rural zone (1 dwelling per 10 acres)
SEPA	State Environmental Protection Act
SMA	Shoreline Management Act
SMAC	Surface Mining Advisory Committee
SMP	Shoreline Management Program
SPB	Seaplane Base
SR	State Route
SR9	State Route 9
SR547	State Route 547
SVCA	Sudden Valley Community Association
SWIF	Nooksack River System-Wide Improvement Framework
TC	Tourist Commercial zone
TDM	Traffic Demand Management
TDR	Transfer of development rights
TMDL	Total Maximum Daily Load
TOD	Transit Oriented Development
TTAG	Transportation Technical Advisory Group
UGA	Urban Growth Area
UGAR	Urban Growth Area Reserve
UR	Urban Residential zone
USDA	United States Department of Agriculture
USDOT	United State Department of Transportation
USGS	United States Geological Survey
VMT	Vehicle Miles Traveled
VMTPC	Vehicle Miles Traveled per Capita
VOC	Volatile Organic Compound
WAC	Washington Administrative Code
WCC	Whatcom County Code or Whatcom Community College
WCCP	Whatcom County Comprehensive Plan

WCHCS	Whatcom County Health and Community Services
WCOG	Whatcom Council of Governments
WDFW	Washington State Department of Fish and Wildlife
WIOA	Workforce Innovation and Opportunity Act
WMB	Watershed Management Board
WRIA#1	Water Resource Inventory Area #1
WSDOT	Washington State Department of Transportation
WSRB	Washington Surveying and Rating Bureau
WTA	Whatcom Transportation Authority
WUCC	Water Utility Coordinating Committee
WUTC	Washington Utilities and Transportation Commission
WWU	Western Washington University

Appendix C
Countywide Planning Policies

Whatcom County
Countywide Planning Policies
Adopted April 1993
(Revised March 11, 1997, January 25, 2005,
February 9, 2021, and October 21, 2025)

A. Public Involvement

1. The County and the cities shall cooperate to provide public education on the requirements of the Growth Management Act.
2. The County and the cities shall provide opportunities for the public to become involved in the growth management planning process through various mechanisms, such as surveys, public workshops, meetings, hearings, and advisory committees. The method of public involvement may vary based on the needs and constituents in various communities and shall include representation of both rural and urban interests on those issues that affect both urban and rural areas.
3. The public shall be notified in a timely manner of opportunities to have input and key decision points in the planning process. This should include actions such as use of on-line resources, notification lists, timely consideration of public comments, broad notification of property owners and residents during a planning process, and notification to community and neighborhood groups. The cities shall also develop a public participation process to solicit and consider comments from residents outside city limits but within existing and proposed Urban Growth Areas.
4. Public comments and viewpoints shall be considered in the decision-making process in development of draft plans and regulations. Consideration of public comments shall be evident in the decision-making process.
5. The County and the cities shall establish a system for community and neighborhood liaison to foster communication between the respective government and its neighborhoods. This system would also provide a point of contact for issues that may affect the community or neighborhoods.
6. Various planning techniques, such as overlay maps and Geographic Information Systems, shall be utilized to allow the public and public officials to evaluate planning proposals and provide the ability to make accurate comparison of issues so appropriate trade-offs can be consciously made.

B. Urban Versus Rural Distinctions

1. Whatcom County shall primarily become a government of rural areas in land use matters directed towards agriculture, forestry and other natural resources and natural resource based industries. The county may work with the public to further define or modify types of rural areas based on the characteristics and needs of different areas. This Section shall not preclude County governance of large urban industrial areas outside of the city UGA's (see Cherry Point below), urban growth areas not yet annexed or incorporated, and developed rural areas where the "urban" designation is inappropriate.
2. The County shall discourage urban level or high intensity development outside Urban Growth Areas, limited areas of more intensive rural development (LAMIRDS), and vested plats.
3. Whatcom County shall promote appropriate land uses and allow for infill within LAMIRDS. These areas have been delineated, and will not be expanded beyond logical outer boundaries in accordance with RCW 36.70.070(5).
4. In the next 20 years, Whatcom County should discourage "new fully contained communities" (as defined and authorized by RCW 36.70A.350) outside designated Urban Growth Areas.
5. Whatcom County may undertake a public process to further define or modify rural areas and rural growth as distinct from urban growth areas.

C. Urban Growth Areas

1. Urban growth needs shall be met by a combination of in-fill within cities and by growth within designated city and non-city Urban Growth Areas.
2. The size and location of Urban Growth Areas shall be consistent with the Growth Management Act, adopted local policies and capital facilities plans.
- 3a. The County and Cities will work together to develop countywide population and housing need projections, and associated allocations to Urban Growth Areas, that are within the range of the Washington State Office of Financial Management projections. The County and Cities will also work together to develop countywide employment projections and associated allocations to Urban Growth Areas. These allocations will be used to determine whether Urban Growth Areas include sufficient land capacity to permit the urban growth that is projected to occur in the County for the succeeding twenty-year period.
- 3b. The County and Cities shall develop a Land Capacity Analysis Methodology, which is a consistent approach to calculating the land supply needed within an urban growth area. The Land Capacity Analysis Methodology will consider limitations imposed by critical area regulations, infrastructure needs, open space, existing uses, local market factors and the ability of the jurisdiction to provide services. It is recognized that the above limitations may vary by jurisdiction, but the method for applying them shall be consistent. Urban

growth areas shall permit a range of densities and uses; however, these uses and densities may vary among jurisdictions.

4. Urban Growth Areas shall be evaluated in the timeframes set forth in the Growth Management Act to determine if they contain sufficient land capacity to accommodate the urban growth that is projected for the succeeding twenty-year period. The market factor for each Urban Growth Area shall also be evaluated. The Land Capacity Analysis will be used to determine whether the land supply is adequate to meet the needs of the community or whether the land supply is excessive.
5. Urban Growth Areas should be established in a way that preserves agricultural land, forestry, mineral resources, treaty natural resources (e.g. salmon, wildlife, traditional foods), tribal cultural resources, water resources, and critical areas. Urban growth shall maintain proper buffers from natural resource areas to minimize conflicts with natural resources and industries based on them. Any proposed UGA expansion in the 100 year floodplain must comply with RCW 36.70A.110. Any proposed UGA expansion should minimize risks posed by natural hazards.

D. City Urban Growth Areas

1. The Urban Growth Areas for the small cities shall be of an adequate size to allow them to become viable economic centers with a balance of jobs and housing. The small cities shall do appropriate planning to ensure adequate distribution of land uses and services at a range of urban densities and zoning classifications.
2. Urban Growth Areas for cities shall include those areas contiguous to cities that are suitable for urban growth as set forth in the Growth Management Act.
3. Cities shall develop plans to provide urban level water and sewer services within their Urban Growth Areas. These plans should be developed in cooperation with existing water and sewer purveyors within each city's Urban Area, and may be implemented through interlocal agreements.
4. Existing cities should accommodate additional housing at a range of densities appropriately responsive to the city's community vision before extending city Urban Growth Areas into areas where growth would adversely impact critical areas and resource lands. In those small cities entirely or almost entirely surrounded by flood plains, critical area and resource lands or within Shellfish Protection Districts, the County and cities shall seek to negotiate a balance between protection of resources and the allocation of adequate land area to meet the growth needs of the city.
5. All cities should grow in an efficient manner and, where reasonable, shall provide for adequate open space between cities.
6. Cities should be encouraged to provide positive incentives for in-fill.

E. Non-City Urban Growth Areas

1. Urban Growth Areas have been established in areas that are not contiguous to existing cities, and are already characterized by urban growth where adequate facilities and services can be provided. These are the Birch Bay, Cherry Point, and Columbia Valley UGAs.
2. Non-city urban growth areas, for already urbanized unincorporated residential areas, shall be encouraged to infill in a way that will facilitate efficient provision of facilities and services consistent with the scale of development.
3. Cherry Point shall be designated as an unincorporated industrial urban growth area in recognition of existing large scale industrial land uses. Additional large scale development shall be encouraged consistent with the ability to provide needed services and consistent with protecting critical areas along with other environmental protection considerations. The Cherry Point industrial area is an important and appropriate area for industry due to its access to deep water shipping, rail, all-weather roads, its location near the Canadian border, and its contribution to the County's goal of providing family wage jobs.
4. The County shall assure that there are plans to provide appropriate levels of urban facilities and services within non-city Urban Growth Areas. These plans should be developed by special purpose districts, water associations and private service providers within each of these Areas, and may be implemented, where appropriate, through interlocal agreements.

F. Contiguous, Orderly Development and Planning in Urban Growth Areas

1. Cities and the County shall execute interlocal agreements to coordinate plans for and manage growth in Urban Growth Areas prior to annexations. Interlocal agreements shall acknowledge and implement the Countywide Planning Policies.
2. Interlocal agreements shall incorporate clear and reasonable criteria for orderly annexation. The County and the cities shall establish a process to consider public input as part of the interlocal agreement approval processes and, if appropriate, encourage districts to participate. If adequate procedures are developed to replace it, the Boundary Review Board may be replaced.
3. All urbanized areas currently within urban growth boundaries associated with cities should be encouraged to annex to cities. Orderly annexations with logical boundaries are encouraged. Interlocal agreements shall specify guidelines on size, timing of annexations and urban levels of development, and tax revenue sharing when appropriate.
4. Within Urban Growth Areas, cities shall not extend water and sewer utilities without an adopted program for annexation and an adopted Capital Facilities Plan. Exceptions may be made in cases where human health is threatened as determined by the County Health Department. If water extensions are made,

they shall be consistent with the service area boundaries and other provisions within the adopted Coordinated Water System Plan.

5. In the areas where utilities presently extend beyond city limits, but are within Urban Growth Areas, the city, County, and the existing water purveyors for the area should coordinate planning efforts.
6. Unless specifically provided for by state statutes, Cities shall not extend urban levels of water service to serve urban uses outside Urban Growth Areas. If legally allowed water extensions are made outside of Urban Growth Areas, the maximum number of connections shall not exceed the density allowed under the associated zoning. The number of connections shall be specified in a legally binding document at the time the extension is approved. Property contiguous to extension of utilities necessary to solve existing water deficiencies, but which cannot benefit from them because of zoning constraints, shall not be assessed for those improvements.
7. The availability of pipeline capacity required to meet local needs and/or supply shall not be used to justify comprehensive plan and/or rezone applications that propose more intensive land use in agricultural land, forestry, and rural areas.
8. The cities and the County shall cooperate to identify and balance the needs of each jurisdiction and entity when planning for transition of services and annexation within Urban Growth Areas. The cities and the County should coordinate with special purpose districts and other service providers in this process. This intergovernmental cooperation and coordination may be reflected in revenue agreements, work programs for joint projects, and regional solutions adopted by the affected parties.
9. Major transportation, utility and greenway corridors shall be planned within Urban Growth Areas.
10. Interlocal agreements shall include a process for reviewing development standards within Urban Growth Areas.
11. To encourage contiguous, orderly development and annexation of residential lands in Urban Growth Areas around cities, the County shall designate Urban Residential or other zones limiting density to a maximum of one dwelling unit per ten acres until public water and sewer are provided.
12. The County and the cities shall coordinate drainage, stormwater management and flood control in Urban Growth Areas.

G. Affordable Housing

1. The County and the cities shall take actions to ensure a balance of housing and economic growth consistent with each jurisdiction's employment base and diverse income levels and to reduce commuting times and traffic congestion.
2. The County and the cities shall identify sufficient capacity of land for a healthy mix of home types, sizes, and prices, including but not limited to ownership

opportunities for the widest possible range of incomes, income-restricted housing, manufactured housing, multifamily housing, co-living housing, farmworker housing, group homes, foster care facilities, emergency housing, emergency shelters, and permanent supportive housing and other supportive housing types.

3. Affordable housing should be convenient to major employment centers and public services or be designed to accommodate public transportation.
4. The County and the cities shall promote innovative techniques and develop strategies to provide for affordable housing with design, density, lot sizes and development standards that provide for a variety of housing types.
5. The County and the cities shall review existing regulations and policies that exclude or discourage multi-family, co-living housing, farmworker housing, low-income, and permanent supportive housing and emergency housing and shelter in their communities and reduce any identified barriers; they shall not adopt regulations and policies which do so. Mobile, modular, and manufactured homes on individual lots, mobile home parks, accessory units, inclusionary zoning, mixed use, and increased densities shall be reviewed as affordable housing alternatives.
6. The County and the cities shall work together, and with the private sector, other public and non-profit agencies, community groups, and trade representatives to plan for a regional distribution of housing for all income levels, including permanent supportive housing types and emergency housing and shelter for very low-income households.
7. Low income, multi-family and diverse and supportive housing options shall not be concentrated in only a few communities or neighborhoods.
8. The County and the cities shall consider reducing impact and/or mitigation fees for affordable housing provided in a proposed development.

H. Open Space/Greenbelt Corridors

1. Adequate open space is vital to the quality of life and sense of place in Whatcom County. The County, cities, Port of Bellingham, and other appropriate jurisdictions should coordinate protection of linked greenbelts, within and between Urban Growth Areas, parks, and open space to protect wildlife corridors, provide flood resilience, support infiltration of water, and to enhance recreational opportunities, public access and trail development.
2. The County and the cities shall plan for greenbelts and open space in their Comprehensive Planning processes and coordinate with each other. Open space systems should include lands which contain natural areas, habitat lands, natural drainage features, and/or other environmental, cultural and scenic resources. With increased residential densities, jurisdictions also should ensure provision of adequate neighborhood parks and play areas within safe bicycling and walking distance for children.

3. The County and the cities shall encourage, to the extent it is feasible, separation of Urban Growth Areas through planning, zoning, development regulations, open space purchase, conservation easements and other mechanisms which may be appropriate. Incentives such as density bonuses, design flexibility, density credit/fee in lieu and transferable development rights may be offered to affected land owners.
4. The County and cities should work cooperatively to protect and restore stream corridors within Urban Growth Areas that support anadromous fish.

I. Economic Development and Employment

1. Whatcom County recognizes that a healthy economy, which provides opportunity for diverse segments of the community, is important to the quality of life in the area. The Whatcom County Comprehensive Economic Development Strategy (CEDS) "is a long-term planning document that is intended to guide economic development throughout a region."
2. New business development and expansion of existing businesses are key factors in providing "family wage" jobs and a strong tax base. Economic development that pays family wage rates should be encouraged. Industrial land designations must be sufficient to permit the concentration of industry in appropriate locations for the 20 year planning period. In order to attract new industry and provide for expansion of existing industries, the County and the cities will designate land supply of sufficient size and diversity to provide a range of suitable locations for industrial development. The designation of this land shall be established in a way that preserves natural resource based industries and critical areas.
3. To provide sufficient land supply for industrial growth and development, industrial designations must not only include lands suitable for development, but also lands suitably zoned to provide adequate buffers. It is also important that these lands and buffers be conserved with appropriate land use and zoning provisions to ensure that they will be available for future use.
4. Encourage workforce education and training and responsible and sustainable business recruitment, retention, and expansion according to city and County comprehensive plans and current Whatcom County Comprehensive Economic Development Strategy (CEDS) in order to support diverse and resilient business and industry. Work with funding agencies and the private sector to facilitate extension of adequate electric, sewer, water, telecommunications and road access to existing commercial and industrial-zoned properties, creating shovel-ready sites.
5. The County and the cities should include an economic development element in their Comprehensive Plans. Economic development elements should be consistent with the CEDS. Economic development shall be coordinated with environmental concerns to protect the quality of life. Planning efforts should address economic sustainability. As part of the comprehensive planning

process and through implementation of the comprehensive plan, the County has adopted goals, policies and regulations that protect resource lands and support and encourage resource-based industries.

6. The County and the cities should continue to cooperate with the Port of Bellingham's Economic Development Division, Regional Economic Partnership to maintain the CEDS for infrastructure funding. Other appropriate organizations, businesses, and individuals should be involved in the process.
7. Economic vitality and job development shall be encouraged in all the cities and in designated areas of the County consistent with County and city comprehensive plan policies, particularly addressing adequacy of transportation corridors, public transportation, impacts on the environment, and the ability of the area to provide urban services in UGAs and rural services outside UGAs.
8. Economic development should be encouraged that:
 - a. Does not adversely impact the environment;
 - b. Is consistent with local comprehensive plans;
 - c. Provides jobs to County residents;
 - d. Addresses unemployment problems in the County and seeks innovative techniques to attract different industries for a more diversified economic base;
 - e. Promotes reinvestment in the local economy;
 - f. Supports retention and expansion of existing businesses.
 - g. Promotes transition to and development of renewable energy sources.
9. The County and the cities recognize the need for the protection and utilization of natural resources and resource lands including agricultural, mineral, forestry and fishing. As part of a broad based economy, productive timber, agriculture, fisheries, and mineral resource industries should be supported to operate in a sustainable manner.
10. The cities and County may set policies for approving proposals to authorize siting of Major Industrial Developments for large or resource-based industries outside of Urban Growth Areas (as per RCW 36.70A.365). The master planning process for specific manufacturing, industrial, or commercial businesses shall address infrastructure, buffers, environmental protection, sprawl, resource lands, critical areas, and land supply.
11. Whatcom County and the cities encourage siting of industrial uses in proximity to and to further utilization of our access to deep water and port facilities for shipping, rail, airports, roadways, utility corridors and the international border.

J. Countywide Transportation Facilities and Strategies

1. The Whatcom Council of Governments (WCOG), composed primarily of elected officials appointed from all area jurisdictions, is the designated Regional Transportation Planning Organization (RTPO) for Whatcom County. Under the Growth Management Act (GMA), RTPOs are directed to conduct regional, cooperative transportation planning. WCOG is also the region's federally-recognized Metropolitan Planning Organization (MPO). As a combined RTPO/MPO, WCOG regularly updates a 20-year Regional/Metropolitan Transportation Plan (R/MTP) including contents required by GMA (and by federal, MPO planning laws and regulations). The R/MTP includes regional transportation goals, projected system conditions, strategies, and investment priorities. WCOG has adopted the R/MTP. The GMA requires RTPOs to review and certify that updates to local comprehensive plans' transportation elements (counties and cities) and changes to county-wide planning policies 1) conform with GMA requirements and 2) are consistent with the current R/MTP. The County and the cities will continue to support the RTPO on an on-going basis to coordinate transportation planning across Whatcom County.
2. Whatcom County jurisdictions shall encourage multimodal transportation, including alternative modes of transportation to the single occupancy vehicle. Each jurisdiction shall encourage:
 - a. Use of public transportation;
 - b. Development of on-street bicycle routes and pedestrian and bicycle trail corridors;
 - c. Adequate pedestrian facilities;
 - d. Connections between different modes of transportation;
 - e. Intermodal connection of freight transportation.
3. To encourage multimodal transportation, single occupant vehicle alternatives and development of pedestrian scale neighborhoods, high density residential development shall be encouraged in urban growth areas with particular attention to those locations within cities and in close proximity to arterials and main transit routes.
4. Cities are particularly encouraged to support transit and pedestrian friendly mixed use developments within their UGAs to help achieve the goals supported in these policies.
5. Where the level of service (LOS) for a locally owned transportation facility adopted in a County or city comprehensive plan cannot be maintained as a result of proposed new development, that development shall be denied, unless transportation improvements or strategies to accommodate the impacts of development are made concurrent with the development.
6. Strategies for maintaining established levels of service may include transportation demand management techniques, impact or mitigation fees,

enhanced access to public transportation service, and/or other steps to reduce or limit traffic congestion.

7. Priorities shall be established and expenditures coordinated for countywide bicycle and trail corridors. Bicycle and pedestrian-specific trails and other facilities shall be included during project planning and review. Coordinated corridors and cost sharing should be explored among all responsible and interested parties.
8. Whatcom County and the cities should work cooperatively with the Whatcom Council of Governments, Whatcom Transportation Authority, WSDOT and other agencies with jurisdiction to plan for inter-county and international transportation links, such as airports, border crossings, passenger rail, freight rail, transit, ferries, and other transportation facilities.
9. Encourage “complete streets” principles. Complete streets are designed and operated to enable safe use and support mobility for all users, including people of all ages and abilities, regardless of whether they are travelling as drivers/passengers, pedestrians, bicyclists, or public transportation riders.

K. Siting of Public Facilities

1. As part of the comprehensive planning process, the County and the cities shall identify appropriate land for public facilities which meets the needs of the community, such as schools, recreation, transportation and utility corridors, human service facilities, and airport and other port facilities.
2. The County and the cities will implement a cooperative and structured process, which includes early and continuous public involvement, to consider siting of essential public facilities of a regional and statewide nature. State facilities shall conform to local siting procedures.
3. Public facilities that generate substantial travel demand should be sited along or near major transportation and public transit corridors, where available.
4. The County and the cities shall work with their respective school district to encourage siting of schools in areas where substantial development exists or is projected and near public transportation corridors.
5. Sharing of corridors for major utilities, trails and other transportation rights-of-way is encouraged when not in conflict with goals to protect wildlife, public health and safety.

L. Impact Fees

1. The County and the cities are encouraged to adopt fair and reasonable impact and/or mitigation fee ordinances to ensure that new growth pays its fair share of the cost of capital facilities, such as transportation improvements, parks, schools, and fire protection facilities.

2. When requested by a school district or fire district, the County and cities should work with the district to develop impact fees as appropriate to the district's capital needs.

M. Intergovernmental Cooperation

1. The County and the cities will coordinate and cooperate throughout the comprehensive plan, development regulations and urban growth area reviews and updates undertaken pursuant to the Growth Management Act, RCW 36.70A. This coordination and cooperation will address topics including but not limited to amount and location of population, housing, and employment growth, capital facilities, transportation, climate change and community resilience. As a component of this coordination and cooperation, the County Executive may convene a Growth Management Planning Committee comprised of elected officials from the County and the cities, representatives of the Lummi Nation and Nooksack Tribe and, where deemed appropriate, representatives from other agencies and Tribes.
2. To adequately plan for growth and implement the policies of the Growth Management Act, the County and Cities will work with other governmental jurisdictions in Whatcom County, including the Lummi Nation, Nooksack Tribe, and the Port of Bellingham, to establish on-going mechanisms to improve communication, information sharing and coordinated approaches to common issues and concerns.
3. Whatcom County and the cities should communicate with neighboring counties and governments in British Columbia and work cooperatively on growth management issues that cross county and national borders.

N. Water Quality and Quantity

1. The cities and the County, in coordination with other municipal corporations, tribal governments, federal and state agencies, and public and private utilities, shall cooperate in the protection of water resources and in drawing upon said water to support growth.
2. The Cities and the County in cooperation with other municipal corporations and tribal governments shall adopt zoning regulations and development standards to protect water resources. Where there are potential conflicts with designations required by the Growth Management Act, such as natural resource lands and critical areas, water resource protection shall generally have priority.
3. Jurisdictions shall cooperate to protect and restore water resources and fish habitat within UGAs and across jurisdictional boundaries to maintain quality of life, economic health, and protect treaty natural resources in Whatcom County.
4. Jurisdictions involved in the development of ground and/or surface water management plans shall pursue the adoption and implementation of the plans, as well as coordination and integration of the plans into local comprehensive

plans as appropriate. Examples of such plans include the Lake Whatcom Management Plan, WRIA 1 Watershed Management Plan, Shellfish Protection District Plans and drinking water source protection plans.

5. To inform Growth Management Act planning efforts, water resources management should be coordinated through participation in the Water Resources Inventory Area (WRIA) 1 Watershed Management Board process and in accordance with applicable federal, state and local regulations.
6. All jurisdictions shall maximize reduction of water pollutants from stormwater runoff and combined sewer overflows.

O. Fiscal Impact

1. It is recognized that if the Growth Management Act and these policies are implemented to their maximum extent, County government may eventually lose the tax base needed to operate essential services, including the criminal justice function and the Offices of Treasurer, Assessor, and Auditor, which serve all jurisdictions in the area. Revenue-sharing shall be addressed in inter-local agreements between Cities and the County.

P. Private Property Rights

1. As required in the Growth Management Act, private property shall not be taken for public use without just compensation having been made. It is not the purpose of this paragraph to expand or reduce the scope of private property already provided in local, state and federal law.
2. The County as required by Whatcom County Home Rule Charter Section 1.11, and cities should establish a pro-active process to anticipate potential takings.

Q. Review and Evaluation Program

1. The County and cities will cooperate to implement and maintain a program that meets the review and evaluation requirements of RCW 36.70A.215, unless the Growth Management Act no longer contains these requirements or sufficient funds are not appropriated by the state.
2. The purposes of this program are to:
 - a. Compare actual (achieved) development densities with planned development densities and determine whether the County and cities are achieving planned urban densities within urban growth areas and have sufficient suitable land to accommodate housing needs and planned employment growth through the remainder of the 20-year planning period.
 - b. Identify and adopt reasonable measures, if necessary, to reduce the differences between actual development patterns and growth and development assumptions contained in the County comprehensive plan and/or city comprehensive plans.

3. The County, in conjunction with the cities, will develop and maintain a Review and Evaluation Program Methodology, taking into consideration the State Department of Commerce Review & Evaluation Program Buildable Lands Guidelines.
4. The County, in conjunction with the cities, will prepare, adopt, and publish a Buildable Lands Report in accordance with the timeframes set forth in the Growth Management Act.
5. The County and cities will follow the Review and Evaluation Program Methodology for the collection, monitoring, and analysis of development activity data, and comparing actual growth and development patterns with growth and development assumptions. As part of this process, the cities and County will collect data annually. The cities will provide collected data to the County upon request.
6. When the Buildable Lands Report identifies inconsistencies between actual development patterns and growth and development assumptions and targets contained in the County comprehensive plan and/or city comprehensive plans, the County and cities will discuss whether reasonable measures are necessary and appropriate to address such inconsistencies before considering adjusting urban growth areas. Each jurisdiction will individually determine whether reasonable measures are required under the Growth Management Act for their jurisdiction.
7. The County and cities will cooperate, and make every effort at the staff level, to resolve disputes regarding inconsistencies in collection and analysis of data.
8. Nothing in this policy will be construed as altering the land use power of any Whatcom County jurisdiction under established law.

R. Dispute Resolution Procedures

1. The County and cities will work cooperatively to implement the countywide planning policies. The County and cities will work together to attempt to resolve any disputes regarding implementation of the countywide planning policies.
2. In the event of an impasse, the jurisdictions involved may mutually agree to use mediation for a minimum of 90 days. After the 90 day period, the parties may, by mutual agreement, elect to utilize binding arbitration. In the event that the parties agree to use arbitration, a three member arbitration panel will be selected by mutual agreement. If the parties cannot agree on membership of the panel, each party will select one member and those two members will select the third member. The decision of the arbitration panel on the issue will be final.
3. If mediation, arbitration, or both are used, each jurisdiction will be responsible for its own legal costs, but the jurisdictions involved will split the costs of a mediator or arbitrators evenly.

4. Nothing in this policy will be construed as altering the land use power of any Whatcom County jurisdiction under established law.

S. Tribal Cultural Resources

1. The County and cities shall work individually and cooperatively with the affected tribe(s) to protect natural and cultural resources through individual and joint efforts. Opportunities for open communication and early government-to-government consultation regarding resource identification, management and protection protocols should be established.
2. Federal, state and local laws pertaining to cultural resources and human remains should be followed.
3. The County and cities should establish a clear and fair process for resolving any disagreements regarding the identification, protection, or management of tribal cultural resources. This process should involve mediation and conflict resolution techniques that respect and affirm tribal sovereignty, treaty rights and traditional practices.
4. The County and cities will work with the Washington State Department of Archaeology and Historic Preservation (DAHP) and affected tribes to identify, protect and manage historic, archaeological, and cultural sites as well as sites and structures of significance in compliance with federal, state, and local laws. Tribal cultural resources include sites, features, places, cultural landscapes, sacred places and objects with cultural value.

T. Climate Change/Community Resilience

1. The County and the cities will work individually and cooperatively to limit and address impacts from climate change and increase community resilience.
2. As determined to be appropriate by each jurisdiction consistent with the Growth Management Act, County and city comprehensive plans will include policies to adapt to and mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resilience to climate impacts and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice.
3. The County and cities will incorporate comprehensive plan policies to support the net zero greenhouse gas emissions target by 2050 consistent with the Washington statewide target set by the State Legislature (RCW 70A.45.020).
4. The County and cities will incorporate comprehensive plan policies to address natural hazards created or aggravated by climate change, protect natural areas to foster climate resilience, and enhance community resilience to climate impacts.

5. The County and cities will incorporate comprehensive plan policies to identify vulnerable populations and overburdened communities and address their exposure to climate impacts.

Appendix D Bibliography

Chapter 1: Introduction and Growth Projections

- *BERK: Whatcom County Population and Employment Projections and Urban Growth Area Allocations Phase 1 Technical Report, Revised November 1, 2013.*
- Dean Runyan Associates for Washington State Business and Tourism Development: *Washington State County Travel Impact Report*, October 2002.
- ECONorthwest: *Whatcom County Population and Economic Forecast*, May 2002.
- [Leland Consulting Group: Whatcom County Comprehensive Plan Population and Employment: Growth Projections and Preliminary Allocations, May 2024.](#)
- United States Department of Agriculture: *Census of Agriculture Profiles*, 1977.
- [U.S. Department of Agriculture: 2012 Census of Agriculture, May 2014.](#)
- [U.S. Census Bureau: B25004 Vacancy Status, 2023.](#)
- [WA State of Washington Office of Financial Management: 2012 Projections County Growth Management Population Projections by Age and Sex: 2010-2040, August 2012.](#)
- Western Washington University, Center for Economic and Business Research: *Natural Resources Sector Profile, Fall 2002.*
- Western Washington University, Center for Economic and Business Research: *Trade Sector Profile, Fall 2002.*
- Whatcom County Health Department: *Coordinated Water System Plan Update, February 2000.*
- Chapter 2: Land Use [Drayton Harbor Shellfish Protection District Advisory Committee: Drayton Harbor Shellfish Protection District Recovery Plan - 2007 Update, March 21, 2007.](#)
- Federal Aviation Administration Advisory Circular 150/5200-33: *Hazardous Wildlife attractants on or Near Airports.*
- Shutt Moen Associates. *California Airport Land Use Planning Handbook, State of California Department of Transportation Division of Aeronautics, January 2002.*
- WA State Department of Transportation Aviation Division. *Airports and Compatible Land Use Volume 1*, February 1999.
- [WA State Department of Ecology: Water Quality Atlas.](#)
- [WA State Department of Ecology: Drayton Harbor Bacteria Total Maximum Daily Load \(TMDL\) Draft Technical Study and Water Quality Improvement Plan, August 2025.](#)
- [WA State Department of Natural Resources: Cherry Point Aquatic Reserve Management Plan, April 2024.](#)
- [WA State Department of Commerce: Climate Element Planning Guidance, December 2023.](#)
- [Whatcom County: Whatcom County Rural Land Study 2019 Update: A Collaborative Report Identifying Rural Areas of Agricultural Significance and Tracking Changes Over Time, 2019.](#)

- [Whatcom County: Whatcom County Coordinated Water System Plan, September, 2025.](#)
- *Whatcom County: Whatcom County Forest Resilience Plan, Whatcom County Forest Resilience Task Force, 2025*

Chapter 3: Housing

- *Bellingham Comprehensive Plan: Housing Element, Part IV.*
- *Bellingham Consolidated Plan.*
- *Bellingham-Whatcom County Housing Authority.*
- *The Birch Bay-Blaine Subarea Background Document. Bellingham, WA, 1987.*
- Burris, Preston. *Whatcom County Planning and Development Services Department, Bellingham, Washington. Interview on Methods for Conducting a Windshield Survey of Housing Stock Conditions in Select Parts of Whatcom County, May, 1994.*
- *The Chuckanut Lake Samish Subarea Background Document. Bellingham, WA, 1984.*
- [City of Bellingham: Bellingham Housing Statistics Planning and Community Development Department ArcGIS Story maps.](#)
- *Community Counts: Whatcom County Health Indicator Report 2002.*
- *ECONorthwest: Whatcom County Population and Economic Forecasts, 2002.*
- *Jones Associates: Cherry Point-Ferndale Background. Whatcom County, WA, 1979.*
- [Leland Consulting Group: Whatcom County and City Comprehensive Plans. Racially Disparate Impact Analysis, November 14, 2025.](#)
- [Leland Consulting Group: Whatcom County Comprehensive Plan. Background Research on Selected Economic, Demographic, and Housing Trends, July 18, 2024.](#)
- *Leland Consulting Group: Whatcom County Comprehensive Plan Housing Allocation Methodology: Modified Housing for All Planning Tool (HAPT) and Housing Unit Targets, June 9, 2026.*
- *The Point Roberts Subarea Background Document. Bellingham, WA, 1990.*
- *Property Counselors: Population, Economic and Housing Projections 1990-2000-2010. Property Counselors, 1991.*
- *The South Fork Valley Background Document. Bellingham, WA, 1991.*
- *Tedrow, Lucky M. 1990 Census Material on Population and Housing. Bellingham: Western Washington University, [1994].*
- *U.S. Census: 2000.*
- [U.S. Census Bureau: DP04 occupied housing units, 2022.](#)
- *U.S. Department of Commerce (DOC). 1990 Census of Population and Housing Summary Social, Economic and Housing Characteristics/Washington, DOC, 1990.*
- *U.S. Department of Housing and Urban Development. The Comprehensive Housing Affordability Strategy (CHAS) Databook. Washington, 1991.*
- [U.S. Department of Housing and Urban Development Office of Policy Development and Research: Consolidated Planning/CHAS Data, 2016-2020.](#)
- [U.S. Department of Housing and Urban Development Office of Policy Development and Research: 2023 Income Limits Documentation System, 2023.](#)

- [U.S. Department of Housing and Urban Development: *Housing for All Planning Tool*, 2024.](#)
- WA State Department of Community Development (DCD). *Assessing Your Community's Housing Needs*, State of Washington, 1992.
- WA State Department of Community Development (DCD). *Housing Resource Guide and Other Essentials for Affordable Housing*, State of Washington, 1993.
- [WA State Department of Commerce: Book 1 Establishing Housing Targets for your Community County-level considerations for housing planning, July, 2023 updated September 1, 2023.](#)
- [WA State Department of Commerce: Book 2 Guidance for Updating Your Housing Element Updating your housing element to address new requirements, August 23, 2023 updated September 20, 2024.](#)
- [WA State Department of Commerce: Book 3 Guidance to Address Racially Disparate Impacts Updating your housing element to address new requirements, April 25, 2023.](#)
- [Whatcom County. Land Capacity Analysis for Permanent Housing and Employment Needs Methodology, November 14, 2025.](#)
- Whatcom County Planning Department. *The Urban Fringe Background Document*. Bellingham, WA, 1982.
- Whatcom County Planning Department. *The Lynden-Nooksack Valley Subarea Background Document*. Bellingham, WA, 1983.
- *Whatcom Real Estate Research Report*.

Chapter 4: Capital Facilities

- [Memorandum of Agreement with Nooksack Indian Tribe, Lummi Nation, and Washington Department of Fish and Wildlife with Respect to Remediation of Fish Barrier Culverts, June 5, 2023](#)
- [Whatcom County Sheriff's Office Division of Emergency Management: *Whatcom County Comprehensive Emergency Management Plan*, October 2022.](#)

Chapter 5: Utilities

- American Planning Association. *Environment and Development*. Chicago: American Planning Association, 1992.
- Bonneville Power Administration. *1991 Northwest Conservation and Electric Power Plan*. Portland: Bonneville Power Administration, 1991.
- *Charting a Course for the Future: Technical Appendix*. Portland: Bonneville Power Administration, 1992.
- Cascade Natural Gas. *Natural Gas - Utilities Element for Local Comprehensive Plans*. Seattle: Cascade Natural Gas, 1993.
- *Draft GMA Electrical Facilities Plan*. Bellevue: Puget Sound Power and Light Company, 1992.
- Flaven, Christopher and Lenssen, Nicholas. *Beyond the Petroleum Age: Designing a Solar Economy*. Washington, D.C.: World Watch Institute, 1990.
- Hanson, Mark, "Electric Utility Least-Cost Planning: Making it Work Within a Multi-Attribute Decision-Making Framework," *Journal of the American Planning Association*, Vol. 57 (1) (Winter 1991).

- *Issue Alert; Gearing Up for Tomorrow's Energy Needs: BPA's 1992 Resource Program*. Portland: Bonneville Power Administration, 1992.
- Jefferson County Planning Department. *Jefferson County Comprehensive Plan*. Port Townsend, WA, 1979.
- *Jurisdictions' Comprehensive Plans*. Bellevue: Puget Sound Power and Light Company, 1992.
- Northwest Power Planning Council. *1991 Northwest Conservation and Electric Power Plan, Volumes I and II*. Portland: Northwest Power Planning Council, 1991.
- Northwest Energy News. Portland: Northwest Power Planning Council, 1992.
- Planners Briefing Book on Electric Utility Issues in Growth Management. Bellevue: Puget Sound Power and Light, 1993.
- Puget Sound Power Electric Utilities Task Force. *Inter-Utility Task Force Report on Growth Management: Findings and Recommendations*. Place of publication not given: Puget Sound Power Electric Utilities Task Force, 1992.
- *Puget Sound Area Electric Reliability Plan, Draft Environmental Impact Statement*. Portland Bonneville Power Administration, 1991.
- Puget Sound Inter-Utilities Task Force. *Regional Inter-Utility Report*. Place of publication not given: Puget Sound Inter-Utilities Task Force, 1992.
- Puget Sound Power and Light Company. *Model Electric Utility Element for Local*.
- Resources for the Future. *Resources*. Washington, D.C.: Resources for the Future, 1992.
- *Staff Issue Paper: Solar Electric Resources*. Portland: Northwest Power Planning Council, 1989.
- *Securing Future Opportunities 1990-1991*. Bellevue: Puget Sound Power and Light Company, 1989.
- *Update*. Portland: Northwest Power Planning Council, 1993.
- US WEST Communications, Inc. *Statements for Communities Planning Under Washington State Growth Management Act*. Seattle: U.S. WEST, Communications, Inc., 1992.
- Washington Energy Strategy Committee. *Washington's Energy Strategy: An Invitation to Action*. Olympia: Washington Energy Strategy Committee, 1993.
- WA State Department of Natural Resources. *Coal Maturation and Natural Gas Potential of Western and Central Washington*. Olympia: Washington State Department of Natural Resources, 1991.
- [Whatcom County: Whatcom County Coordinated Water System Plan, September, 2025.](#)

Chapter 6: Transportation

- [U.S. Department of Transportation. What Is a Safe System Approach? January 14, 2025.](#)

Chapter 7: Economic Development

- *The Business Triad Report, 1981.*
- *Comprehensive Economic Development Strategies.*
- *Coordinated Water System Plan.*

- *East County economic Plans.*
- *The Economic Futures Study of Whatcom County, 1983.*
- *Key Policies (Goals & Strategies) Related to Local Economic Development.*
- [Leland Consulting Group: Whatcom County Comprehensive Plan Population and Employment: Growth Projections and Preliminary Allocations, May 2024.](#)
- *Port of Bellingham and PUD #1: Evaluation for Industry Recruitment in Whatcom County and Cherry Point. Bellingham, WA, 2000.*
- [Port of Bellingham Economic Development Division Regional Economic Partnership: Whatcom County Comprehensive Economic Development Strategy \(CEDES\) 2022-2026, October 2021.](#)
- *The Stanford Research Institute Study, 1983.*
- [WA State Department of Natural Resources: Whatcom County 2023 Quarterly Income Report – Quarter 4.](#)
- [WA State Department of Revenue: Forest Excise Tax Distribution 2024.](#)
- *Whatcom County Comprehensive Economic Development strategies Project List.*

Chapter 8: Resource Lands

- *Element Solutions. (December 22, 2014). Aggregate Resource Inventory 2014 Study Update Whatcom County, Washington.*
- *GeoEngineers, Inc. Report Engineering geology Evaluation Aggregate Resource Inventory Study Whatcom County, Washington, 2003.*
- *Loen, Jeffrey S. et al. Reconnaissance Investigation of Sand, Gravel, and Quarried Bedrock Resources in the Bellingham, 1:100,000 Quadrangle, Washington State Department of Natural Resources, 2001.*
- *Pacific Lutheran University, The Aggregates Industry in Washington - Economic Impact and Importance, Prepared for the Washington Aggregates and Concrete Association, July 2003.*
- [Port of Bellingham Economic Development Division Regional Economic Partnership: Whatcom County Comprehensive Economic Development Strategy \(CEDES\) 2022-2026, October 2021.](#)
- [U.S. Department of Agriculture: Census of Agriculture 2022 County Profile Whatcom County Washington, 2022.](#)
- *Whatcom County Planning and Development Services. The Whatcom County Natural Resources Report: Mineral Resources Background Document, 1994.*
- [Whatcom County: Climate Action Plan, November 9, 2021.](#)
- [Whatcom County: Whatcom County Rural Land Study: A Collaborative Report Identifying Rural Areas of Agricultural Significance and Tracking Changes Over Time, 2017.](#)
- [Whatcom County: Whatcom County Rural Land Study 2019 Update: A Collaborative Report Identifying Rural Areas of Agricultural Significance and Tracking Changes Over Time, 2019.](#)
- [Working Waterfront Coalition of Whatcom County, Dan Tucker: Whatcom Marine Trades Economic Impact Study 2024, December 18, 2024.](#)

Chapter 9: Parks & Recreation

- [Flores, L., Schwartz, A. 2015. *Economic Contribution of Outdoor Recreation to Whatcom County, Washington. Earth Economics, Tacoma, WA*](#)
- [Whatcom County Bicycle Pedestrian Advisory Committee: *Whatcom County Pedestrian and Bicycle Plan, Revised and updated December 2010.*](#)
- [Whatcom County Natural Heritage Task Force. \(June 19, 1991\). *Preserving a Way of Life: A Natural Heritage Plan for Whatcom County.*](#)
- [Whatcom County Comprehensive Parks, Recreation, and Open Space Plan, January 2024.](#)
-

Chapter 10: Environment

- [Blake, S., & Peterson, B. \(March 25, 2005\) *Water Resources Inventory 1 \(WRIA 1\) Watershed Management Plan- Phase 1.*](#)
- Climate Change Impacts and Adaptation in Washington State: Technical Summaries for Decision Makers, Climate Impacts Group, University of Washington, December 2013.
- *Drayton Harbor Growing Area Initial Closure Response Strategy*. State of Washington, May 1995.
- Department of Ecology. *Samish Bay Watershed Nonpoint Action Plan and Final Closure Response Strategy*. Skagit County, WA, December 1995.
- [Geneva Consulting. \(July 2007\). *WRIA 1 Detailed Implementation Plan July 2007.*](#)
- [Herrera Environmental Consultants, Inc: *Lake Whatcom Comprehensive Plan: Stormwater Capital Program Update Whatcom County, Washington, September 25, 2017.*](#)
- [Melillo, Jerry M., Terese \(T.C.\) Richmond, and Gary W. Yohe, Eds., 2014: *Climate Change Impacts in the United States: The Third National Climate Assessment. U.S. Global Change Research Program, 841 pp. doi:10.7930/J0Z31WJ2.*](#)
- Prince George's County MD, Department of Environmental Resources Programs & Planning Division. *Low-Impact Development Design Strategies - An Integrated Design Approach*. June 1999.
- URS Corporation. *Whatcom County Endangered Species Act Evaluation Report*. April 2001.
- Washington State Department of Ecology. *Drayton Harbor Focused Watershed Analysis Remediating Water Quality Impacts Through Application of Landscape Principles*. Publication No. 03-06-025. State of Washington, August 2003.
- *Water Source Protection Plan for the Lake Whatcom Watershed*. Bellingham, WA, April 2000.
- *Water Quality Assessments of Selected Lakes within Washington State*. Publication No. 00-03-009. State of Washington, March 2000.
- Whatcom County, City of Bellingham and Water District No. 10. *Lake Whatcom Reservoir Management Program for 2000*. Bellingham, WA, January 2000.

- Whatcom County Public Works. *Lower Nooksack River Comprehensive Flood Hazard Management Plan*. Whatcom County, WA, October 1999.
- [WA State Department of Ecology: Western Washington Phase II Municipal Stormwater Permit, July 1, 2024.](#)
- [WA State Department of Ecology: Lake Whatcom Watershed Total Phosphorus and Bacteria Total Maximum Daily Loads Volume 1. Water Quality Study Findings, November 2008.](#)
- [WA State Department of Ecology: Lake Whatcom Watershed Total Phosphorus and Bacteria Total Maximum Daily Loads Volume 2. Water Quality Improvement Report and Implementation Strategy, November 2014 \(revised February 2016\).](#)
- [WA Department of Health. \(2014\). 2014 Annual Growing Area Evaluation. Retrieved August 25, 2014, from Washington Department of Health.](#)
- [WA State Department of Natural Resources. Washington Geological Information Portal.](#)
- [Whatcom County Public Works Department: Alluvial Fan Hazard Planning.](#)
- [Whatcom County Public Works – Natural Resources: Drayton Harbor Shellfish Recovery and Protection Plan, May 2024.](#)
- [Whatcom County Natural Heritage Task Force. \(June 19, 1991\). Preserving a Way of Life: A Natural Heritage Plan for Whatcom County.](#)
- [Whatcom County Sheriff's Office: 2021 Natural Hazards Mitigation Plan, September 30, 2021.](#)
- [WRIA 1 Salmonid Recovery Plan. \(April 30, 2005\).](#)
- WRIA 1 Salmon Recovery Board. (May 24, 2011). *2011-2013 WRIA 1 Salmon Recovery 3-Year Project Plan*.

Chapter 12: Climate

- WA State Department of Commerce. (WSDOC). "Climate Element Planning Guidance". (December, 2025). Growth Management Services. Retrieved from <https://deptofcommerce.app.box.com/s/glw5yo8jvfsd40eoa4kdsx0fzde3s9ij>

Appendix A: Glossary

- Butler, S. (2016, November 23). *Inclusionary Zoning: One Approach to Create Affordable Housing*. (T. M. Center, Producer) Retrieved from MRSC: <https://mrsc.org/stay-informed/mrsc-insight/november-2016/inclusionary-zoning-for-affordable-housing>.
- [Opportunity Council: "Area Median Income".](#)
- [Port of Bellingham Economic Development Division. "Associate Development Organization". \(February 2022\). Whatcom County Comprehensive Plan Economic Development Strategy \(CEDS\) 2022-2026.](#)
- United States Department of Agriculture (USDA). (n.d.). *Agrivoltaics: Coming Soon to a Farm Near You?* Retrieved January 06, 2026, from USDA Climate Hubs U.S. Department of Agriculture: <https://www.climatehubs.usda.gov/hubs/northeast/topic/agrivoltaics-coming-soon-farm-near-you>,
- USGCRP, 2023: Fifth National Climate Assessment, Crimmins, A.R., C.W. Avery, D.R. Easterling, K.E. Kunkel, B.C. Stewart, and T.K. Maycock, Eds. U.S. Global Change Research Program, Washington, DC, USA.

https://toolkit.climate.gov/sites/default/files/2025-07/NCA5_2023_FullReport.pdf.

- [WA State Department of Ecology \(WSDOE\). "Clean Energy Coordinated Permitting Process".](#)
- [Municipal Research and Services Center \(MRSC\). "Mixed-Use Development". \(September 24, 2024\).](#)
- [WA State Department of Transportation \(WSDOT\). "Multimodal Level of Service \(MMLOS\)". \(August 2024\). *WSDOT Multimodal Level of Service Interim Guidance \(Aug 2024\)*.](#)
- [WA State Department of Transportation \(WSDOT\). "Multimodal Transportation". *Module 1: Why Multimodal?*](#)
- [Federal Emergency Management Agency \(FEMA\). "Natural Hazard". *Natural Hazards*.](#)
- [WA State Department of Ecology \(WSDOE\). "Nonpoint Source Pollution". *Nonpoint pollution*.](#)
- [United State Census Bureau \(USCB\). "North American Industry Classification System \(NAICS\)". \(November 25, 2025\). *North American Industry Classification System*.](#)
- [WA State Department of Revenue \(WSDOR\). "Paratransit". \(June 26, 2013\). *Transit Authorities Providing Paratransit Services*.](#)
- [National Oceanic and Atmospheric Administration National Ocean Service \(NOA\). "Point Source Pollution". *Point Source Pollution Tutorial*.](#)
- [WA State Emergency Management Division \(WSEMD\). "Severe Storm". *Severe Storms what to do before, during and after*.](#)
- [WA State Department of Ecology \(WSDOE\). "Total Maximum Daily Load \(TMDL\)". *Total Maximum Daily Load process*.](#)
- [WA State Department of Commerce \(WSDOC\). "Transit Oriented Development \(TOD\)". \(August 12, 2025\). *Transit-Oriented Development*.](#)
- [WA State Department of Commerce. \(WSDOC\). "Climate Element Planning Guidance". \(December, 2025\). Growth Management Services. Retrieved from <https://deptofcommerce.app.box.com/s/glw5yo8jvfsd40eoa4kdsx0fzde3s9ij>](#)

Appendix E: 20-Year Capital Facilities Plan

- [Leland Consulting Group: *Whatcom County Comprehensive Plan Allocations for Special Districts by Growth Alternative*, June 18, 2025.](#)

DRAFT Whatcom County 20-Year Capital Facilities Plan

Whatcom County Comprehensive Plan – Appendix E ■ June 12th, 2026

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Chapter 1 - Introduction

Capital facilities, such as parks & recreation facilities, County buildings, law enforcement & criminal justice facilities, transportation, stormwater, water, sewer, school, and fire protection facilities are important because they support the growth envisioned in the Whatcom County Comprehensive Plan. Capital facilities generally have very long useful lives, significant costs, and are not mobile.

The focus of this 20-Year Capital Facilities Plan (CFP) is supporting the County's review of urban growth areas and planning needed public facilities for the County's population. County facility plans, city plans, special district plans, population, adopted level of service (LOS) standards and other demand indicators are the principal factors considered in the CFP. This CFP addresses both the shorter term period from 2026-2032 and, more generally, the longer term planning period from 2033-2045.

Growth Management Act

Growth Management Act (GMA) Planning Goal # 12 is to:

Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards (RCW 36.70A.020(12)).

The CFP is required by the GMA under RCW 36.70A.070. The GMA requires the CFP to identify facilities, include a realistic financing plan, and make adjustments to the plan if funding is inadequate. Specifically, RCW 36.70A.070(3) requires the capital facilities plan to include:

- a) An inventory of existing capital facilities owned by public entities, including green infrastructure, showing the locations and capacities of the capital facilities;
- b) a forecast of the future needs for such capital facilities;
- c) the proposed locations and capacities of expanded or new capital facilities;
- d) at least a six-year plan that will finance such capital facilities within projected funding capacities and clearly identifies sources of public money for such purposes; and
- e) a requirement to reassess the land use element if probable funding falls short of meeting existing needs and to ensure that the land use element, capital facilities plan element, and financing plan within the capital facilities plan element are coordinated and consistent.

CFP Purpose

In 2026, the County completed the required urban growth area (UGA) review in which the County considered growth forecasts and allocations, urban growth boundaries, and comprehensive plan designations. Projected population and employment growth to 2045 is a key assumption of this CFP. The purpose of the CFP is to plan adequate public facilities consistent with the Comprehensive Plan's land use element, including UGA planning.

CFP Assumptions

This CFP is based on the following sources of information and assumptions:

- **County Facility Plans:** The County updates the *Seven-Year Capital Improvement Program for Whatcom County Facilities* every other year and this seven-year plan informs the 20-Year CFP. The County updates this 20-Year CFP, which also includes information relating to capital improvements in years 7-20, at least every ten years at the state-required periodic update of the Comprehensive Plan.
- **Service Provider Plans:** The capital plans of cities, special purpose districts, and other service providers, particularly those serving UGAs, were collected and reviewed including inventories, forecast of future needs, planned facilities, growth forecasts, and potential funding.
- **Growth Forecasts:** Forecasts of population and job growth were allocated to each UGA and the rural areas. The 2023 population and employment and the 2045 growth for each capital facility service provider were then estimated by special district boundary.
- **Revenue Forecasts:** Forecasts of revenues for County facilities were prepared out to the 2045 horizon year (Chapter 16). The revenue sources for city and special district service providers are summarized from available plans.

Special Purpose District Plans

Special purpose districts provide a number of facilities addressed by this CFP, including water, sewer, schools, and fire protection. Some of these special districts have prepared their own capital plans that provide information for these facilities. Specifically, with regard to special purpose district plans, Washington Administrative Code 365-196-415(4) indicates that the County should:

- a) Summarize the information within the capital facilities element;
- b) Synthesize the information from the various providers to show that the actions taken together provide adequate public facilities; and
- c) Conclude that the capital facilities element shows how the area will be provided with adequate public facilities.

Special districts play an important role in supporting the County's land use plans. Information from special district plans, when available, has been summarized in this CFP.

CFP Organization

The CFP contains the inventory of existing facilities and presents a summary of capital improvement projects and financing to pay for these projects.

Each type of public facility is presented in a separate chapter, which generally follows the format shown.

- **Inventory of Current Facilities:** A summary of existing capital facilities.
- **Forecast of Future Needs:** A forecast of future capital facility needs, which may include review of the County or service provider level of service (LOS) or design standards if applicable, is presented for each type of public facility.
- **Capital Projects and Funding:** A summary of capital improvements proposed through the planning period. A more detailed plan for County facilities is provided in the *Seven-Year Capital Improvement Program for Whatcom County Facilities 2025-2031*, while generalized County capital improvements and funding for the remainder of the planning period are identified in this 20-year CFP. For non-County providers, capital projects identified in the service providers' most recent plans are summarized.
- **Green Infrastructure:** A summary of green infrastructure as defined by House Bill 1181 as "a wide array of natural assets and built structures within an urban growth area boundary, including parks and other areas with protected tree canopy, and management practices at multiple scales that manage wet weather and that maintain and restore natural hydrology by storing, infiltrating, evapotranspiring, and harvesting and using stormwater," located within the UGA.

Chapter 2 – Parks, Trails, and Activity Centers

The Whatcom County Parks and Recreation Department, was established as an executive department in accordance with the Whatcom County Charter in 1992 (Ordinance 1992-005 and Whatcom County Code Chapter 2.29). The Whatcom County Parks and Recreation Department mission statement is to enrich the quality of life for the community and preserve the natural and cultural heritage of the County through provision of outstanding parks, trails, open space, and natural areas, as well as recreational activities and senior services. Whatcom County government accomplishes this mission by providing a variety of recreational facilities, services, and programs to residents and visitors.

In addition, there are four special parks districts that include land in unincorporated portions of the County. These parks and recreation districts are presented after County facilities.

Inventory of Current Facilities – County Facilities

County Parks, Trails, and Activity Centers

The 2025 inventory of Whatcom County recreation facilities includes approximately 16,200 acres of park and open space area, 79 miles of trails, and 13 activity centers, as shown in more detail in the *Seven-Year Capital Improvement Program for Whatcom County Facilities*.

Future Needs – County Facilities

Whatcom County Comprehensive Plan Policy 4F-1 (in Chapter 4) establishes level of service standards for developed parks and trails, as shown below.

Parks and Trail Level of Service (LOS) Standards

Category	LOS Standard
Developed Parks	9.6 acres per 1,000 population
Trails	0.60 of a mile per 1,000 population

Developed Parks – Forecast of Future Needs

A level of service of 9.6 acres of developed parkland for every 1,000 people in the County was adopted in the Whatcom County Comprehensive Plan. With a projected county-wide population of 301,681 in the year 2045, the County's existing parks will meet the adopted level of service over the 20-year planning period. However, the County is proposing park improvement projects to increase quality of existing park facilities and develop. To meet the longer term needs of a growing population, in addition to development of new parks including Birch Bay Beach Park

and Dittrich Park, this includes continued improvement of Silver Lake Park and planning for improvements to Hovander Homestead Park and Lighthouse Marine Park.

Trails – Forecast of Future Needs

A level of service of 0.60 miles of trails for every 1,000 people in the County was adopted in the Whatcom County Comprehensive Plan. With a projected county-wide population of 301,681 in the year 2045, over 100 additional miles of trails, not including trails developed and managed by non-Whatcom County jurisdictions, would be needed over the 20-year planning period to serve the people of Whatcom County.

Activity Center – Forecast of Future Needs

The Whatcom County Comprehensive Plan does not contain a level of service standard for activity centers. Rather, the Comprehensive Plan Policy 4F-5 states:

Continue to provide and support activity centers, including senior centers, to serve the growing population of Whatcom County by undertaking the following: (1) Community-informed program planning, conducted in coordination with community stakeholders and partners, 2) evaluation of budgetary constraints and opportunities 3) exploration of innovative partnerships for service delivery.

Capital Projects and Funding – County Facilities

Developed Parks

Park projects anticipated in the seven-year planning period include approximately \$49.2 million in improvements. These projects, and their associated funding sources, are shown in the *Seven-Year Capital Improvement Program for Whatcom County Facilities*. These costs would be paid by multiple sources including, but not limited to, Real Estate Excise Tax (REET), grants, and donations. The County will also monitor the adequacy of County park facilities throughout the planning period and consider other capital improvements and maintenance projects if warranted in the future.

Trail Improvements

Trail projects anticipated in the seven-year planning period include approximately \$8.3 million in improvements. These projects, and their associated funding sources, are shown in the *Seven-Year Capital Improvement Program for Whatcom County Facilities*. These costs would be paid from REET and grant funds. The County will also monitor the adequacy of County trail facilities throughout the planning period and consider other capital improvements and maintenance projects if warranted in the future.

Activity Centers

Activity Center projects anticipated in the seven-year planning period include approximately \$18.2 million in improvements. These projects, and their associated funding sources, are shown in the *Seven-Year Capital Improvement Program for Whatcom County Facilities*. These costs would be paid from REET and grant funds. The County will also monitor the adequacy of activity centers throughout the planning period and consider other capital improvements and maintenance projects if warranted in the future.

Regional Parks Districts

There are four regional park districts that include land area in unincorporated Whatcom County:

- Point Roberts Park & Recreation District 1;
- Blaine-Birch Bay Park & Recreation District 2;
- Lynden Regional Parks & Recreation District 3; and
- Columbia Valley Parks & Recreation District.

Point Roberts Park & Recreation District 1

The Point Roberts Park and Recreation District does not have a capital facilities plan or master plan. However, the District conducted a survey to gather community input in Summer 2023. The survey had questions about current recreational activities in the Point Roberts Park and Recreation District as well as future recreational opportunities the community would like to see. The district oversees the community center, which hosts community programs and meetings for local social groups, civic groups, and charities. The district also oversees Baker Field Park with over 2 miles of hiking trails, a playground, a skate park, and the playing field for baseball, football, and soccer. The Community Center houses the senior center which holds lunches on Wednesday and Friday, as well as housing the Historical Center which presents the local history of Point Roberts. The local library and a playground are also located on the Community Center grounds. During times of emergency the building becomes a shelter.

Blaine-Birch Bay Park & Recreation District 2

The *Blaine-Birch Bay Park & Recreation District 2 Master Plan Document* was updated in 2022 by the Blaine-Birch Bay Park and Recreation District 2 Commissioners. The *Master Plan* states:

The Blaine-Birch Bay Park and Recreation District 2 (Formerly Northwest Park and Recreation District 2) has been in existence since 1979. From the time of the original inception of the District, the area has gone through significant change and growth. New homes, businesses, and residents have come to the area over the past twenty years. Residents with a wide range of ages and interests now live full time in the District. Park recreation and trail needs are becoming very important to the livability of the region (p.6).

The *Master Plan* contains a facility inventory identifying park and recreation facilities within the District (pp. 21), recommended LOS standards (pp. 16), funding options and methods (p. 32), and a six-year capital improvement program that includes \$1.5 million in trail connection improvement projects in 2016-2017 (pp. 33-40).

Lynden Regional Parks and Recreation District 3

The Lynden Regional Park and Recreation District was formed in 1996 to meet the recreational needs of the rapidly growing population of the area. The District was originally created with two primary goals in mind: to buy additional property for Lynden Recreational Center (Bender Fields), and to widen the tax base for the purchase, operation, and maintenance of those facilities.

Columbia Valley Parks & Recreation District

The Columbia Valley Parks & Recreation District (CVPRD) Comprehensive Park Plan combines community input with the goals and capacity of the CVPRD to provide a vision that serves the unique interests of the Columbia Valley community. It was updated in 2020 when the Western Washington University's Sustainable Communities Partnership (SCP) program was contracted to compile elements of the plan and to facilitate a community engagement campaign.

In 2022, CVPRD purchased one property that will become community parks. At 7916 Santa Fe Trail, the property has a small creek running through it for which it is named Creekside Park. Improvements, including clearing brush, removing dangerous fallen trees, and more continue at Creekside Park.

Chapter 3 – Maintenance & Operations

Inventory of Current Facilities

The 2025 inventory of County maintenance and operations/facilities management space is 70,681 square feet located at 901 W. Smith Rd. (the Central Shop), 3720 Williamson Way, and 2030 Division Street, as shown in more detail in the *Seven-Year Capital Improvement Program for Whatcom County Facilities*.

Future Needs

Chapter 4 of the Whatcom County Comprehensive Plan does not contain LOS standards for maintenance and operations facilities. Rather, it contains goals and policies supportive of providing adequate County facilities.

Capital Projects and Funding

Projects anticipated in the seven-year planning period total over \$3.7 million in improvements. These projects, and their associated funding sources, are shown in the *Seven-Year Capital Improvement Program for Whatcom County Facilities*.

There are no capital improvement projects currently identified that would add maintenance and operations space within the 7 to 20 year planning period. However, the County will monitor the adequacy of maintenance and operation facilities throughout the planning period and consider capital improvements if warranted in the future. Maintenance projects will be undertaken as needed.

Chapter 4 – General Government Office Buildings and Sites

Inventory of Current Facilities

The 2025 inventory of County general government office buildings and sites is 313,395 square feet at 11 locations, as shown in more detail in the *Seven-Year Capital Improvement Program for Whatcom County Facilities*.

Future Needs

Chapter 4 of the Whatcom County Comprehensive Plan does not contain LOS standards for maintenance and operations facilities. Rather, it contains goals and policies supportive of providing adequate County facilities. Specifically, Comprehensive Plan Policy 4A-1 is to “Plan appropriate County facilities commensurate with the ability of the County to fund them.”

Capital Projects and Funding

Capital improvement projects anticipated in the seven-year planning period include approximately \$57.7 million in improvements. These projects, and their associated funding sources, are shown in the *Seven-Year Capital Improvement Program for Whatcom County Facilities*. These costs would be paid by Real Estate Excise Tax (REET), grants, donations, and foundation funds. The County will also monitor the adequacy of County buildings throughout the planning period and consider capital improvements and maintenance projects if warranted in the future.

Chapter 5 – Sheriff's Office

Inventory of Current Facilities

The newly leased Sheriff's Office space is 29,900 sf. The Sheriff's Office will retain a small portion of the Public Safety building until demolished. square feet at three locations, as shown in more detail in the Seven-Year Capital Improvement Program for Whatcom County Facilities.

Future Needs

Chapter 4 of the Whatcom County Comprehensive Plan does not contain LOS standards for Sheriff's Office space. Rather, it contains goals and policies supportive of providing adequate Sheriff's Office facilities. Specifically, Comprehensive Plan Policy 4D-2 is to:

Maintain Sheriff's Office adult corrections facilities and headquarters to provide a safe environment for the community, staff and inmates. . . Existing facilities may be expanded, remodeled, and/or new facilities developed in response to changing need.

Most Sheriff's Office functions are currently based in the Public Safety Building adjacent to the Courthouse and are remote from the majority of Sheriff's Office Bureau of Law Enforcement and Investigative Services functions that take place in unincorporated Whatcom County. This results in inefficiencies and delays. Space and design factors in current facilities preclude consolidating various functions performed throughout the agency (reception, finance, etc.) and result in redundancies. Because of these issues, existing Sheriff's Office facilities and associated functions will be consolidated (except for "Resident Deputy" program facilities) and may be co-located with the jail.

Capital Projects and Funding

A new, expanded, or remodeled Sheriff's Headquarters facility and a new public safety radio system are proposed within the seven-year planning period. The County leased an existing building for the Sheriff's Office at 4600 Ryzex Way. REET 1 funding can be used to improve the existing facility. The new Public Safety Radio System would cost approximately \$3,360,500 over the 2025-2028 time period. The County will monitor the adequacy of Sheriff's Office facilities throughout the planning period and consider capital improvements if warranted in the future. Maintenance projects will be undertaken as needed. Chapter 6 – Emergency Management

Inventory of Current Facilities

The 2024 inventory of Sheriff's Office, Division of Emergency Management space is 24,000 square feet, located at the Whatcom Unified Emergency Coordination Center (WUECC). Rented by and shared between both Whatcom County and the City of Bellingham, the WUECC is comprised of 2,000 square feet of office space and an additional 22,000 square feet of support facilities (used for meetings, training, exercises, and during emergencies). The WUECC serves as the Emergency Operations Center for both the County and the City.

Future Needs

Chapter 4 of the Whatcom County Comprehensive Plan does not contain LOS standards for emergency management space. Rather, it contains goals and policies supportive of providing adequate emergency management facilities. Specifically, Comprehensive Plan Policy 4D-4 is to:

Maintain adequate facilities for daily emergency management activities and, during an emergency or disaster, for the emergency operations center. The facilities will provide sufficient space for activities relating to emergency/disaster planning, mitigation, response and recovery. Existing facilities may be expanded, remodeled, and/or new facilities developed in response to changing need.

Capital Projects and Funding

There are no capital improvement projects currently identified that would add usable emergency management space within the 20-year planning period. However, the County will monitor the adequacy of emergency management facilities throughout the planning period and consider capital improvements if warranted in the future. Maintenance projects will be undertaken as needed.

Chapter 7 – Adult Corrections

Inventory of Current Facilities

The County's Main Jail was designed and originally built to hold 148 beds, although with some limited remodeling and the use of double bunking, the operational capacity of the main jail should be for the use of 211 beds. Whatcom County completed construction of a 148 bed minimum security correction facility on Division St. in 2006. The Main Jail is located in the Public Safety Building next to the County Courthouse in downtown Bellingham and the Minimum Security Correction Facility is located in the Bakerview Rd. industrial area.

Future Needs

Chapter 4 of the Whatcom County Comprehensive Plan does not contain LOS standards for adult corrections facilities. Rather, it contains goals and policies supportive of providing adequate corrections facilities. Specifically, Comprehensive Plan Policy 4D-2 is to:

Maintain Sheriff's Office adult corrections facilities and headquarters to provide a safe environment for the community, staff, and inmates. The number of jail beds in adult corrections facilities will be determined after review of multiple factors, including projected population growth, State sentencing laws, alternative programs, treatment diversion programs, early release programs, the need to separate violent inmates, the need to separate inmates by gender, the need to separate inmates by other classification considerations, average length of stay, peak inmate populations and available funding. Existing facilities may be expanded, remodeled, and/ or new facilities developed in response to changing need.

There are serious concerns among law and justice officials relating to jail facility needs in the community. This need has been documented over the years with the most recent being the *Building Assessment Studies and Cost Estimated for Capital Improvements at the Jail (Public Safety Building)* (Sept. 2017).

Capital Projects and Funding

Adult corrections projects anticipated in the seven-year planning period include approximately \$178 million in existing facilities improvements. These projects, and their associated funding sources, are shown in the *Seven-Year Capital Improvement Program for Whatcom County Facilities*. The new Jail will be debt financed; debt service payments will be funded primarily from the Public Health, Safety, and Justice Facilities and Services Sales and Use Tax approved

by the votes in November 2023. In addition, the County's jail fund and general fund may be used if needed to cover the debt service payments.

The planning and initial design development of a new Correction and Behavior Health Facilities are underway. Construction of these facilities is estimated to commence in 2027, and be occupied in 2028-2029. The County will monitor the adequacy of jail facilities throughout the planning period and consider capital improvements if warranted in the future. Maintenance projects will be undertaken as needed.

Chapter 8 – Juvenile Detention

Inventory of Current Facilities

The 2024 inventory of County juvenile detention facilities includes 32 beds serving the county-wide population. The juvenile detention facility is located on the sixth floor of the County Courthouse at 311 Grand Avenue.

Future Needs

Chapter 4 of the Whatcom County Comprehensive Plan does not contain LOS standards for juvenile detention. Rather, it contains goals and policies supportive of providing adequate juvenile facilities. Specifically, Comprehensive Plan Policy 4D-3 is to:

Maintain juvenile detention facilities and alternative corrections programs to provide safe and secure methods to provide accountability and support for minors who break the law. Existing facilities may be expanded, remodeled, and/or new facilities developed in response to changing need.

Capital Projects and Funding

There are no capital improvement projects currently identified that would add juvenile detention space within the 20 year planning period. However, the County will monitor the adequacy of juvenile detention facilities and alternative correction methods throughout the planning period and consider capital improvements if warranted in the future. Maintenance projects will be undertaken as needed.

Chapter 9 – Transportation

Transportation (Countywide)

Overview

Whatcom County's roadway network is principally made up of County roads as well as state highways, such as I-5 and SR-9, which provide intercity and interstate connections. In addition to the roadway network, Whatcom County also operates a daily vehicle ferry service between Gooseberry Point and Lummi Island.

Inventory of Current Facilities

The 2024 inventory of County transportation facilities shows a total of 935 miles of County roads (approximately 358 miles are classified as an arterial or collector roadways). Table 9.1. shows the existing miles of countywide arterial roadways by federal functional classification.

Table 9.1. Inventory of County Roadways by Functional Classification

Table 1. Federal Functional Classification (FCC) of County Roadways			
FCC Description	FCC Code	Miles	Percent
Rural Minor Arterial	06	0	0%
Rural Major Collector	07	134.1	14%
Rural Minor Collector	08	153.6	16%
Rural Local Access	09	455.8	49%
Urban Principal Arterial	14	0	0%
Urban Minor Arterial	16	24.8	3%
Urban Major Collector	17	37.1	4%
Urban Minor Collector	18	6.4	1%
Urban Local Access	19	123.5	13%
Total		935.3	100%

Source: Whatcom County Public Works Road Log (2024)

In addition to the roadway network discussed above, the County owns one ferry vessel which it uses to provide its Lummi Island ferry service.

Future Needs

County MMLOS Standards

The Whatcom County Comprehensive Plan's Chapter Six establishes MMLOS standards for multimodal (Pedestrian, Bicycle, Transit, and Vehicle) transportation facilities.

Motor Vehicles

Motor vehicle LOS for roadway segments is based on a volume/capacity (V/C) ratio, the estimated peak-hour volume of a roadway segment divided by the estimated hourly capacity of that segment, as categorized in Table 9.2.

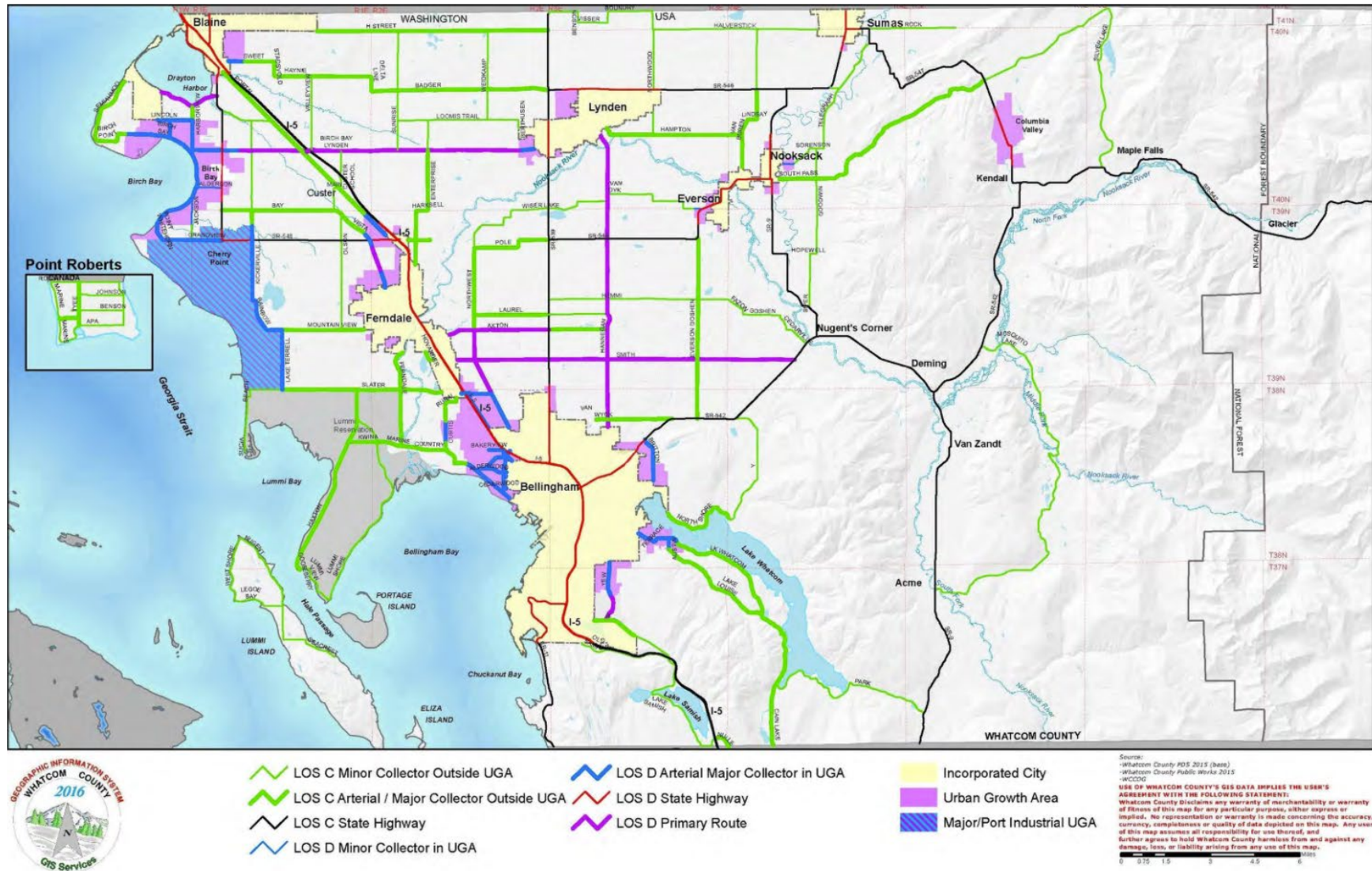
Table 9.2. Volume to Capacity (v/c) Ratio for Vehicular LOS Designations

Vehicular LOS Designation	V/C Range
A	0-0.59
B	0.60-0.69
C	0.70-0.79
D	0.80-0.89
E	0.90-0.99
F	>1.00

Pursuant to GMA requirements, Whatcom County has adopted vehicular LOS standards for road segment operations for motor vehicle travel on county-owned arterials and major collectors. LOS standards for other facilities, including the Lummi Island Ferry, while not used for concurrency, are used for planning purposes.

Whatcom County's adopted vehicle LOS standards for roadway segments are set in Comprehensive Plan Policies 6A-1 through 6A-4. For county arterials and major collectors located outside of urban growth areas during weekday p.m.-peak hours, the adopted LOS is C or better, except for specified primary routes as shown on Map 6-2, which have a LOS of D or better. The LOS standard for county arterials and major collectors within urban growth areas during weekday p.m. peak hours is D or better.

Figure 9.1. Adopted Vehicle LOS Standards



Active Transportation LOS Standards

The GMA also requires counties to include LOS standards for active transportation in the transportation element. Currently, only about 23 miles (2.5 percent) of the 935 miles of the entire Whatcom County road system include bike lanes or are designated as County bicycle routes. Whatcom County’s adopted active transportation LOS standards are set in Comprehensive Plan Policies 6A-7 and 6A-8.

Active Transportation LOS standards were developed based on the planned countywide Active Transportation Network (ATN), shown in Figure 9.2.

The Active Transportation LOS standards shown in Table 9.3 emphasize system completion of sidewalks, pathways, bikeways, or multi-use trails on the County’s roadway network. The LOS designations are shown in green, orange, and red. The existing status of LOS standards for the countywide active transportation network is shown in Figure 9.3.

- **Green** LOS indicates a primary facility meets adopted roadway standards and has facilities on both sides of the street, while a secondary facility may only have facilities on one side of the street.
- **Orange** LOS indicates a primary facility has facilities on only one side of the roadway, when both sides would be preferred.
- **Red** LOS indicates no designated facilities are provided for active transportation users and is considered unacceptable.

LOS	Primary Route	Secondary Route
	Meets County road standards, facilities on both sides	Meets County road standards, facilities on one or both sides
	Facilities exist, but only on one side	N/A
	No facilities exist, does not meet County road standards	No facilities exist, does not meet County road standards

Table 9.3 - Active Transportation Levels of Service Overview

Figure 9.2 Whatcom County Active Transportation Network

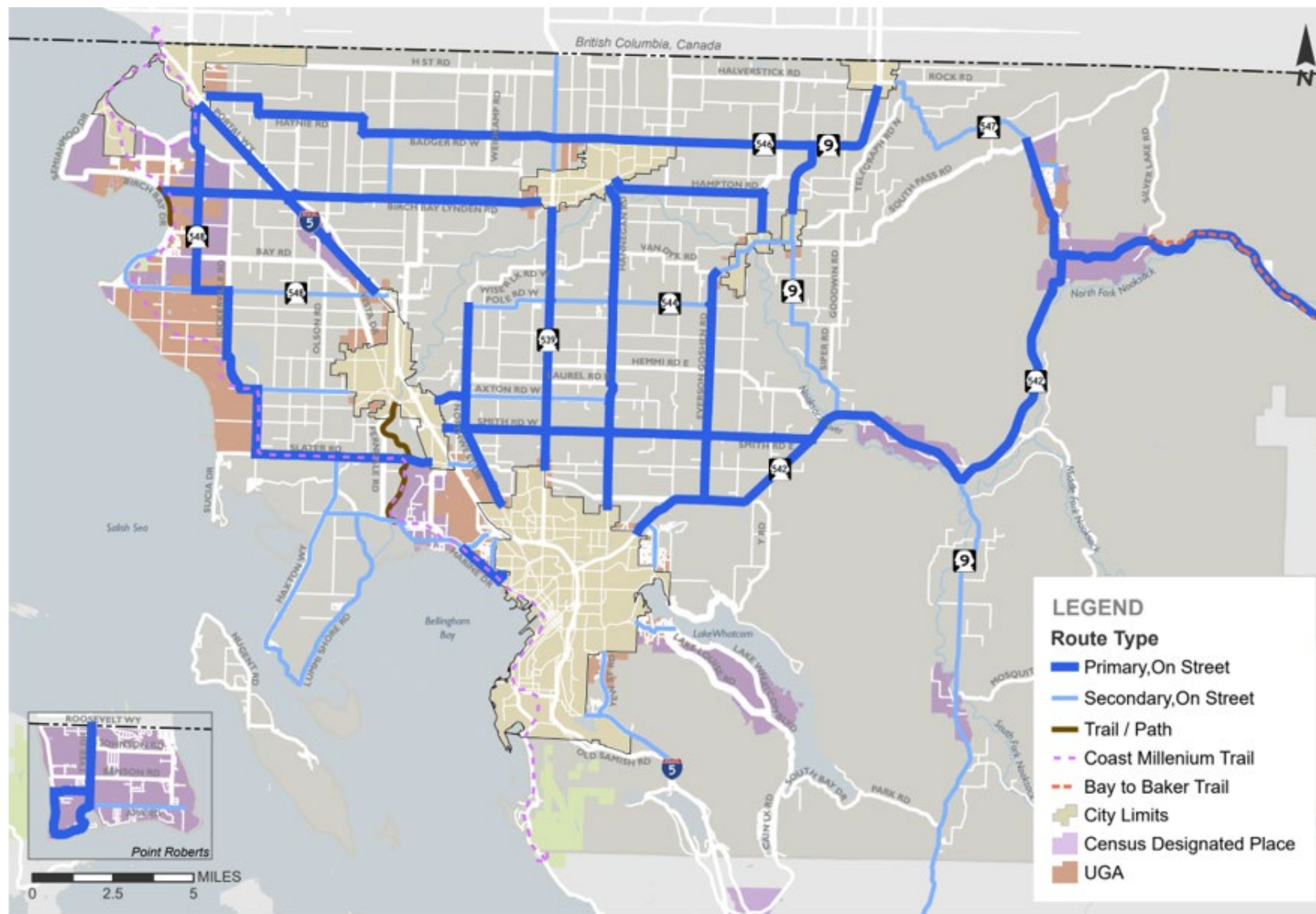
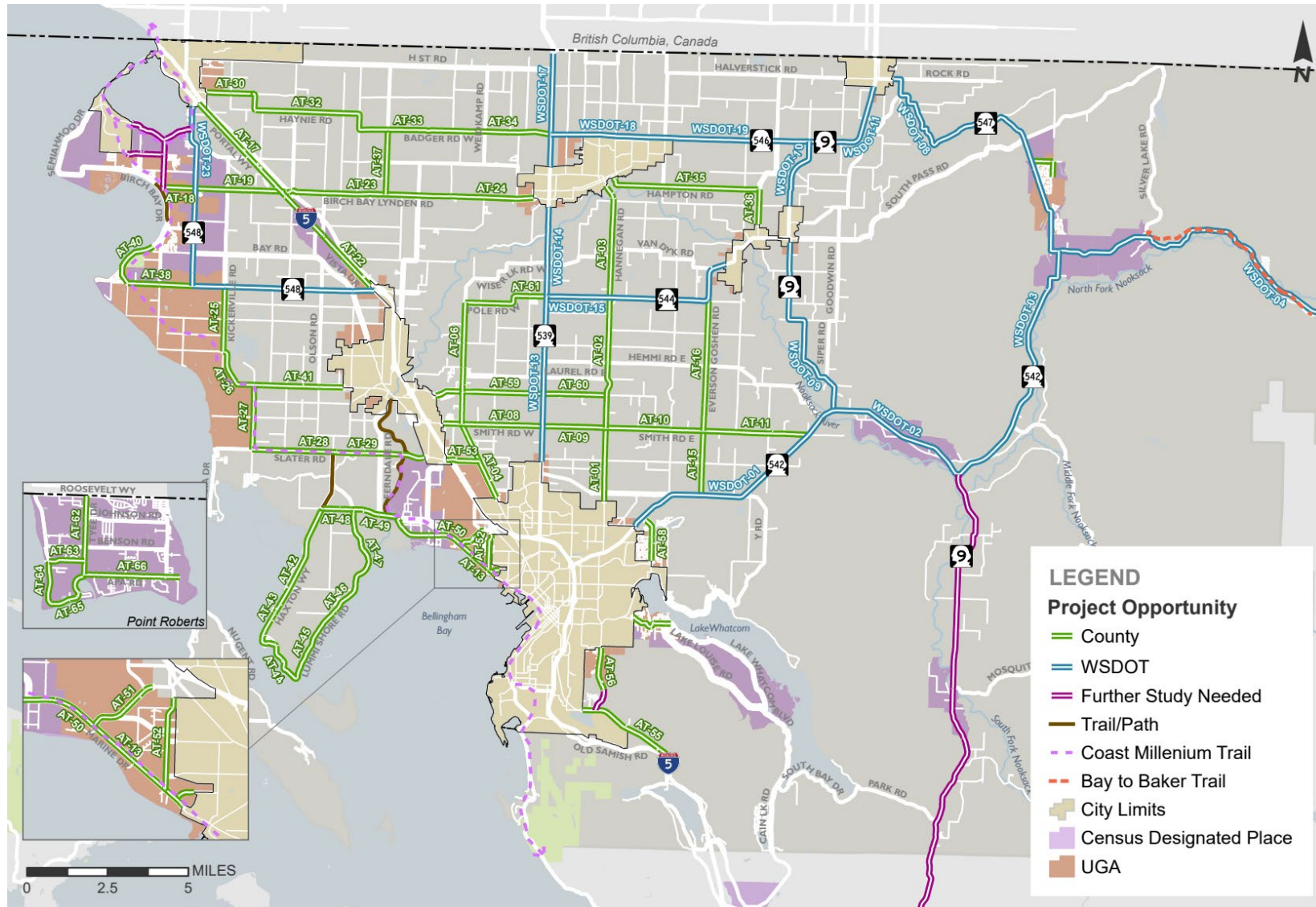


Figure 9.3 Active Transportation Network LOS Status in 2025



Figure 9.4 Long-Term Active Transportation Network Project Improvements



Transit LOS Standard

Whatcom County does not provide transit service and does not control the financial decisions made by WTA. However, Whatcom County does control the public right-of-way in which transit operates and is required to implement the Whatcom County ADA Transition Plan to remove barriers to accessibility within the right-of-way.

Using bus stop locations on WTA bus routes in Whatcom County (Figure 9.5) as a primary criterion to prioritize ADA barrier removal for curb ramps, crossings, and sidewalks will provide mutual benefit to WTA and Whatcom County by making transit stops safe, accessible, comfortable, and convenient to use. Whatcom County has adopted a Transit LOS standard in Comprehensive Plan Policy 6A-9 and as shown in Table 9.4.

LOS	Transit Standard
	ADA Compliant Transit Stop, Sidewalk, and Pad for Shelter
	ADA Compliant Transit Stop, Sidewalk, OR Pad for Shelter
	Non-ADA-compliant Stop, Substandard Ped Connection/Pad
	Non-ADA-Compliant Stop, No Ped Connection, No Pad

Table 9.4 Transit LOS Based on ADA Accessibility

An excellent example of this type of multi-agency mutual benefit is WTA's current funding partnership with the City of Bellingham to fund ADA upgrades at all bus stops (next page). Bellingham has programmed \$75,000 from the Transportation Benefit District (TBD) annually in the Six-Year Transportation Improvement Program (TIP) toward ADA upgrades at WTA bus stops throughout the city.

Whatcom County can program funds in its Six-Year TIP to fund ADA barrier removal at WTA bus stop locations in city UGAs, unincorporated UGAs, such as Birch Bay and Columbia Valley, and in transit-served population centers, such as Geneva and Sudden Valley. County-funded barrier removal should concentrate on ADA ramps and detection pads, crosswalks and user-activated crossing signals, and sidewalks where warranted. WTA should fund concrete bus stop pads within the public right-of-way, and the conversion of bus stop signs into bus shelters that allow transit riders to stay dry while waiting for the bus. This would help both the County and WTA make significant progress in implementing ADA Transition Plans.

F11 - ADA Bus Stop Improvements

Project ID: 0424ADABSI

Divisions: Planning & Fleet & Facilities

Requestor: Mary Anderson

Type:



Rolling Stock



Facilities



Technology

Compliance

WTA 2040 Priority:



Efficiency



Environment



Equity

Description:

This project would construct bus stop pads compliant with ADA requirements. The concrete pads are 5'x8' in size. Out of approximately 880 bus stops, over 50% are not accessible. Every area of the county has unimproved stops, with the majority in Bellingham (219). 25 stops need to be improved per year to meet the goal.

Technology Needs:

Not needed for this project

Goals:

- WTA has a goal of improving all bus stops by 2040.
- Improve accessibility and mobility for priority populations.
 - Seek alternative funding sources, such as local, state and federal grants to build ADA accessible bus stops
 - Install bicycle and pedestrian amenities



Capital Project Dependencies:

- None

Timeline:

25 stops upgraded per year

Cost Estimate:

TOTAL: \$675,000

2025	2026	2027	2028	2029	2030
\$150,000	\$150,000	\$150,000	\$75,000	\$75,000	\$75,000

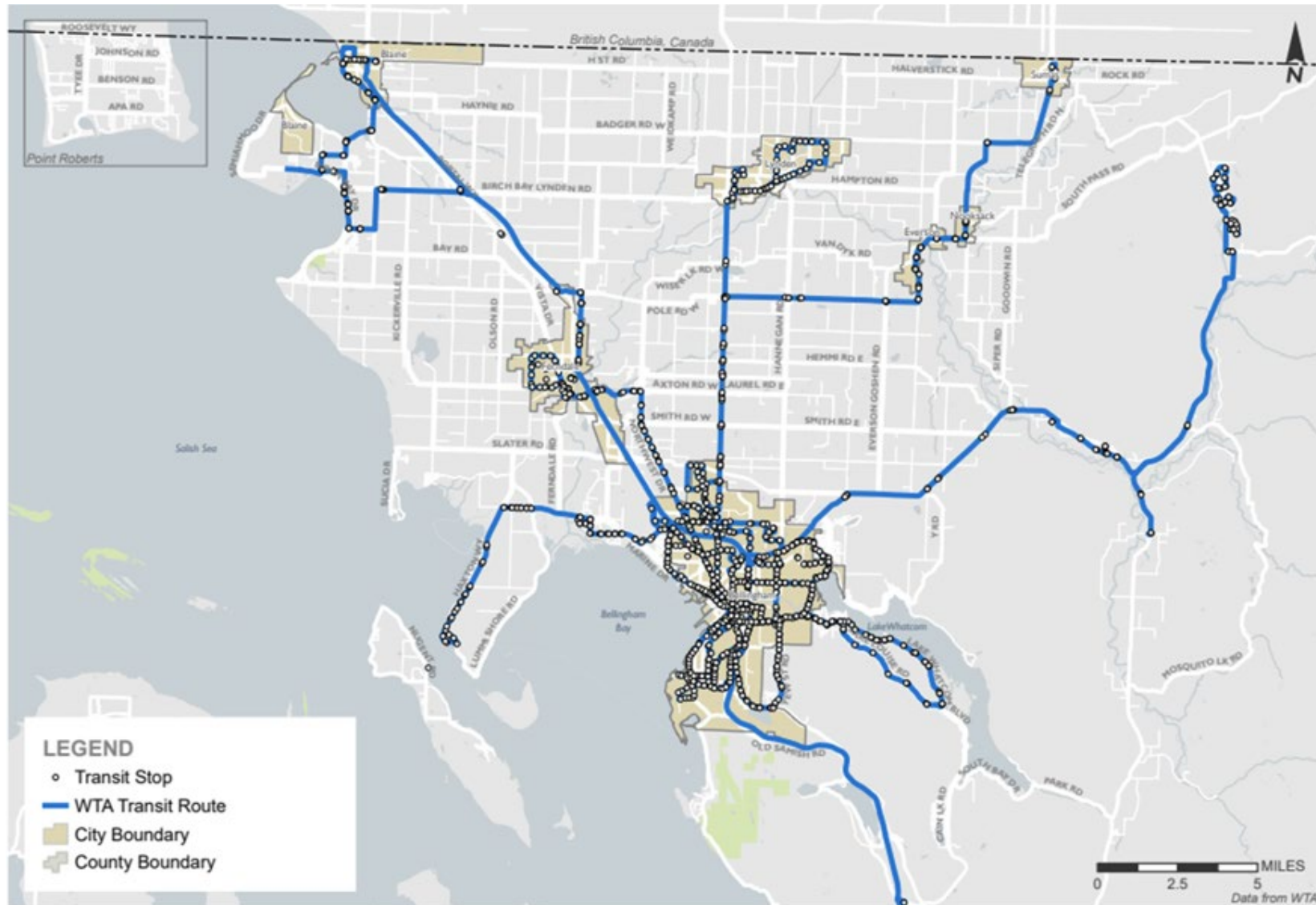
Funding Sources:

WTA funds (\$75,000 per year) for stops throughout the WTA system

Bellingham City Transportation Levy (\$75,000 per year) for City stops through 2027

Source: Page 31, WTA Six-Year Capital Improvement Plan, 2025-2030

Figure 9.5 WTA Bus Stop Locations on Transit Routes in Whatcom County



Transportation MMLOS Analysis

The Transportation MMLOS analysis is taken from the Final EIS produced for the Whatcom County 2025 Comprehensive Plan update.

Vehicular LOS

The WCOG regional travel demand model with a base year of 2023 was used to project population and employment growth and estimate the number of vehicle trips that may be generated in 2045. These trips were then distributed among transportation analysis zones and assigned to the countywide road network. The result is a model forecast of future roadway conditions for vehicles based on the land use assumptions for each of the studied growth alternatives.

The future roadway network reflects future improvement projects for which funding has been committed. After the future 2045 traffic volume on each analysis road segment was projected, it was divided by the road's capacity to calculate the volume to capacity (V/C) ratio. For any segments on which projected V/C would exceed the adopted LOS standard for that road a potential adverse impact was identified, and mitigation identified that would lower V/C to a level within adopted standards.

Table 9.5 lists the county roads with projected 2045 V/C ratios that exceed LOS standards under the Final EIS preferred alternative.

Table 9.5 Whatcom County Road and State Highway LOS Standards and Forecasts for 2045				
County Road	From	To	2025 Adopted LOS	2045 Forecast LOS
Lakeway Drive	Bellingham city limit	Lakeview Street	D	E-F
SR 542 Mt Baker Hwy	Noon Road	Everson Goshen Road	C	D

A total of 0.83 miles of County roadway (Lakeway Drive 0.63-mile from the Bellingham city limit to Terrace Avenue North, 0.16-mile to Lakeview Street, and 0.04-mile to Cable Street) are forecast to operate below adopted LOS standard D (v/c 0.80-0.89), or about 2.4% of the total 358 miles of County arterial and collector roads.

A total of 1.0 mile of state highway (SR 542 Mt. Baker Highway from Noon Road to Everson Goshen Road) in rural Whatcom County is forecast to operate below adopted LOS standard C (v/c 0.75). WSDOT completed a [Corridor Sketch Initiative Review Summary](#) for this section of SR 542 in 2018.

Capital Projects and Funding

Table 9.6 identifies roadway locations that have been identified for improvement over the next 20 years, with planning-level cost estimates. Based on this list and a review of current safety, active transportation, and system preservation needs, the County annually prepares and adopts a Six-Year Transportation Improvement Program (TIP), which programs the implementation of needed improvements over the next six years. Funding sources for transportation improvement projects are identified in Chapter 16.

If sufficient roadway capacity cannot be achieved through these projects, or funding is insufficient to implement the needed capacity increase, the County can consider adjusting the adopted LOS to a lower standard. A project that reconfigures the existing roadway width will increase both active transportation facilities and roadway capacity on Lakeway Drive is included in the 20-year plan.

Rather than additional vehicle capacity, many County roads need safety improvements, active transportation facilities, and geographic connectivity to population centers. Table 9.6 includes a few new roadway alignments, such as Lincoln Road between Shintaffer Road and SR 548 Blaine Road and Horton Road between Northwest Drive and Aldrich Road. These projects are intended to provide additional east-west connectivity north of Birch Bay and northwest of Bellingham.

Table 9.6 Whatcom County Transportation Improvement Projects, 2026-2045

No.	Project Name	Location/ Project Limits	Proposed Improvement	Estimated Project Cost	Active Transportation Network Project ID	Portion in 2026-2031 TIP	Project Comments
1	Birch Bay-Lynden Road/ Harborview Road & Enterprise Road	Intersections	Construct intersection improvements to include roundabout or install turn lanes and install traffic signal when warranted	\$6,000,000	AT-18	Yes; R-13	Alternatives analysis study funded in 2029
2	Lincoln Road Extension and Improvement	Harborview Road to Blaine Road (SR 548)	Reconstruct road to 2-lane urban arterial to Blaine Road with active transportation facilities, roundabouts at Blaine Road and Harborview Road, or alternative route as determined by study	\$30,000,000	Lincoln (Blaine to Harborview) ATN FSN	Yes; R-15	\$300,000 in PE funding for feasibility study
3	Birch Bay-Lynden Rd/Blaine Rd (SR-548)	Intersection	Construct roundabout	\$3,000,000	AT-18	Yes; R-4	Fully funded for construction in 2026
4	Grandview Road (SR 548)/ Vista Drive	Intersection	Construct intersection improvements to include roundabout or install turn lanes and traffic signal when warranted	\$6,000,000	WSDOT-20		WSDOT as Lead Agency
5	Hannegan Road	Bellingham City Limit to Van Wyck Rd	Reconstruct and widen roadway to Urban Minor Arterial standard, add left-turn lanes or roundabout at Van Wyck Road intersection	\$10,000,000	AT-01; enhance to buffered bike lanes		Reduce project to center turn lane at intersection
6	Hannegan Road	Van Wyck Road to E. Pole Road (SR 544)	Reconstruct and widen roadway to Rural Major Collector standard, add left-turn lanes or roundabout at intersections	\$25,000,000	AT-02 & AT-03; enhance to buffered bike lanes		Reduce to center turn lane at intersections; roundabouts long-term, if warranted
7	Marine Drive	Alderwood Av to Bridge #172 (BNSF Overpass)	Reconstruct to Urban Minor Arterial standards with active transportation facilities	\$4,250,000	AT-50	Yes; R-8	Alderwood Av to Bridge #172 planned for construction in 2028
8	Slater Road/Ferndale Road	Intersection	Construct intersection improvements to include roundabout or install turn lanes and traffic signal when warranted	\$5,000,000	AT-29		Lummi Nation as lead agency; Existing left turn pockets; signal or roundabout long-term
9	Birch Bay-Lynden Road/ Kickerville Road	Intersection	Construct intersection improvements to install left turn lanes	\$1,365,000	AT-19	Yes; R-5	Planned for construction in 2029
10	Slater Road/Pacific Hwy	Intersection	Construct roundabout	n/a	AT-53		Funded through Connecting WA with WSDOT as Lead Agency
11	Slater Road/Northwest Drive	Intersection	Construct roundabout	n/a	AT-53	Yes; R-27	Funded through Connecting WA; WSDOT lead agency, Planned construction TBD
12	Lummi Island Access	Gooseberry Point to Lummi Island	Improved access to Lummi Island	\$2,950,000		Yes; R-3	Lummi Nation as Lead Agency
13	Birch Bay Drive/Harborview Road	Intersection	Improve/redesign intersection with turn lanes and traffic signal or roundabout when warranted	\$5,000,000	Harborview (BB to Drayton) = ATN FSN	Yes; R-14	Alternatives analysis funded 2029 (Single-lane roundabout with splitter islands, refuges, RRFBs for pedestrian safety)
14	Harborview Road	Birch Bay Drive to Birch Bay Lynden Rd	Improve roadway to Urban Major Collector standard including active transportation improvements	\$500,000	Harborview (BB to Drayton) = ATN FSN		(Recommend: Sidewalks and marked bike lanes)
15	Harborview Road	Birch Bay Lynden Road to Lincoln Rd	Improve roadway to Urban Major Collector standard including active transportation improvements	\$4,000,000	Harborview (BB to Drayton) = ATN FSN		Paved shoulders or multiuse pathway
Page 1 Total =				\$103,065,000			

Table 9.6 Whatcom County Transportation Improvement Projects, 2026-2045

No.	Project Name	Location/ Project Limits	Proposed Improvement	Estimated Project Cost	Active Transportation Network Project ID	Portion in 2026-2031 TIP	Project Comments
16	Portal Way	Birch Bay Lynden Rd to Blaine City Limit	Reconstruct to Rural Major Collector standard including active transportation improvements	\$4,360,000	AT-17	Yes; R-21	Planned for construction in 2030
17	Portal Way	Birch Bay Lynden Rd to Ferndale City Limit	Reconstruct to Rural Major Collector standard including active transportation improvements	\$5,000,000	AT-22		Key ATN corridor between Ferndale and Blaine
18	Blaine Rd (SR 548)/Drayton Harbor Rd	Intersection	Improve/redesign intersection with turn lanes and traffic signal when warranted	\$5,000,000	WSDOT-23 & Drayton Harbor Rd FSN		WSDOT as lead agency
19	Blaine Road (SR 548)/Loomis Trail Road	Intersection	Improve/redesign intersection with turn lanes and traffic signal when warranted	\$5,000,000	WSDOT-23		WSDOT as lead agency
20	Drayton Harbor Road	Harborview Road to Blaine Road (SR 548)	Improve roadway to Urban Major Collector standard including active transportation improvements	\$15,000,000	Drayton Harbor Rd FSN		Feasibility Study = \$100,000
21	Shintaffer Road	Lincoln Road to Birch Bay Drive	Reconstruct to Urban Major Collector standard with active transportation improvements	\$2,500,000	Further Study Needed		Feasibility Study = \$100,000
22	Alderson Road	Birch Bay Drive to Blaine Road (SR 548)	Reconstruct to Urban Major Collector standard with active transportation improvements	\$3,500,000	Further Study Needed		Feasibility Study = \$100,000
23	Lakeway Drive/Terrace Ave N/Cable Street	Bellingham City Limits to Lakeview St	Pavement rehabilitation, road diet, ADA improvements, active transportation improvements	\$2,300,000	AT-57	Yes; R-6	Planned construction 2028; Active transportation & safety; Seek state TIB grant funds
24	Everson Goshen Road	Mt. Baker Hwy (SR 542) to E. Pole Road (SR 544)	Reconstruct to Urban Major Collector standard with active transportation improvements	\$20,000,000	AT-15 & At-16; Enhance to buffered bike lanes		
25	Everson Goshen Rd/E. Pole Rd (SR 544)	Intersection	Intersection improvements to facilitate freight movement	\$5,000,000	AT-16		WSDOT as Lead Agency
26	Marine Drive	Lummi Shore Drive to Country Lane	Add left turn lanes at Rural Major Collector standards and active transportation improvements	\$4,500,000	AT-49 & AT-50		
27	Wynn Road	Marine Dr to Barnes Rd ROW (Lockwood Connector)	Railroad crossing improvements and active transportation improvements	\$2,000,000	ATN as Multiuse Trail		Multiuse Trail Connector
28	Marine Drive	Bancroft to Bridge #172 (BNSF Railroad Overpass)	Add left turn lanes at Rural Major Collector standards and active transportation improvements	\$5,000,000	AT-50		
29	W. Smith Rd/Northwest Drive	Intersection	Construct roundabout when warranted	\$5,360,000	AT-04 & AT-08	Yes; R-20	Planned construction in 2030
Page 2 Total =				\$84,520,000			

Table 9.6 Whatcom County Transportation Improvement Projects, 2026-2045

No.	Project Name	Location/ Project Limits	Proposed Improvement	Estimated Project Cost	Active Transportation Network Project ID	Portion in 2026-2031 TIP	Project Comments
30	Slater Road	Ferndale City Limits to Ferndale Road	Roadway reconstruction to Rural Major Collector and Urban Minor Arterial standards, roadway elevation (tressel), new bridge, and active transportation improvements	\$80,000,000	AT-29; Enhance paved shoulders to buffered bike lanes	Yes	Lummi Nation as Lead Agency
31	E. Smith Road/Everson Goshen Road	Intersection	Construct roundabout when warranted	\$4,510,000	AT-10 & AT-11; Enhance to buffered bike lanes	Yes; R-22	Existing 5-foot paved shoulders
32	Hannegan Road/E. Hemmi Road	Intersection	Construct roundabout or traffic signal when warranted	\$5,000,000	AT-02	Yes; R-13	Alternatives analysis study funded in 2029
33	Northwest Drive	Bellingham City Limit to W. Smith Rd	Add left turn lanes at Urban Minor Arterial standards and non-motorized transportation improvements	\$8,000,000	AT-04; Enhance paved shoulder to buffered bike lanes		Existing 6-foot paved shoulders
34	Slater Road	Lake Terrell Rd to 0.70 miles W of Haxton Way	Add left turn lanes at Rural Major Collector standards	\$1,560,000	AT-28 & AT-29; Enhance paved shoulders to buffered bike lanes	Yes; R-19	Existing 5-foot paved shoulders
35	Limestone Road	Kendall Rd (SR 547) to County Road end	Reconstruct roadway to Rural Minor Collector standard; Multiuse Sidepath	\$3,000,000	AT-67		Private development mitigation
36	Slater Road/Lake Terrell Road	Intersection	Construct roundabout or traffic signal when warranted	\$5,000,000	AT-28 & AT-29; Enhance paved shoulders to buffered bike lanes		Existing 5-foot paved shoulders
37	Mountain View Road/Lake Terrell Road	Intersection	Construct roundabout or traffic signal when warranted	\$5,000,000	AT-27 & AT-41		
38	Kwina Rd/Lummi Shore Dr/Marine Dr	Intersection	Construct roundabout when warranted	\$10,000,000	AT-47; AT-48; AT-49		Lummi Nation as Lead Agency
39	SR 542/Noon Road/Van Wyck Road	Intersection	Construct roundabout when warranted	\$5,000,000	DEIS mitigation; WSDOT -01	Yes; R-14	County feasibility study 2029; WSDOT as lead agency for SR 542/Van Wyck
Page 3 Total =				\$127,070,000			
Table 9.6 Grand Total =				\$314,655,000			

Table 9.7 Whatcom County Active Transportation Improvement Projects, 2026-2045

No.	Project Name	Location/ Project Limits	Financially Feasible Active Transportation Improvement Options	Estimated Project Cost	Active Transportation Network Project ID	Portion in 2026-2031 TIP	Project Comments
40	Drayton Harbor Road	Blaine City Limits to SR 548	Further Study Needed	\$100,000	FSN ¹		Census Place
41	Lincoln Road	Blaine City Limits to Harborview Rd	Further Study Needed	\$100,000	FSN ¹	Yes	Birch Bay UGA
42	Harborview Road	Birch Bay Dr to Drayton Harbor Rd	Further Study Needed	\$100,000	FSN ¹		Birch Bay UGA
43	Shintaffer Road	Birch Bay Dr to Drayton Harbor Rd	Further Study Needed	\$100,000	FSN ¹		Birch Bay UGA
44	Hannegan Road	Bellingham City Limits to Smith Road	Existing Signed Bike Route	\$0	AT-01		Rural County
45	Hannegan Road	Smith Road to SR 544	Existing Signed Bike Route	\$0	AT-02		Rural County
46	Hannegan Road	Lynden City Limits to SR 544	Existing Signed Bike Route	\$0	AT-03		Rural County
47	Northwest Drive	Bellingham city limits to Smith Road	Bike Lane Signs and Markings (Bham UGA Standard)*	\$26,851	AT-04	Yes	Bellingham UGA
			ADA Concrete Sidewalk (Bham UGA Standard)*	\$8,928,017	AT-04	Yes	Bellingham UGA
			*Alternative = Off-Street Multiuse Pathway (Requires Mitigation \$\$)		\$5,517,918		
48	Northwest Drive	Smith Road to W Axton Rd	Signed Bike Route	\$10,555	AT-05	Yes	Rural County
49	Northwest Drive	W Axton Road to W Pole Rd	Signed Bike Route	\$29,198	AT-06		Rural County
50	Smith Road West	Ferndale City Limits to Northwest Dr	Signed Bike Route	\$6,067	AT-07		Rural County
51	Smith Road West	Northwest Drive to SR 539	Signed Bike Route	\$32,499	AT-08		Rural County
52	Smith Road East	SR 539 to Hannegan Rd	Signed Bike Route	\$20,685	AT-09		Rural County
53	Smith Road East	Hannegan Rd to Everson Goshen Rd	Signed Bike Route	\$31,941	AT-10	Yes	Rural County
54	Smith Road East	Everson Goshen Rd-SR 542 Mt Baker Hy	Signed Bike Route	\$34,461	AT-11	Yes	Rural County
55	Axton Road West	Ferndale City Limits to Northwest Drive	Signed Bike Route	\$9,104	AT-12	Yes	Rural County
56	Marine Drive	Bellingham City Limits to Alderwood	Existing 5' marked Bike Lanes + 5' ADA sidewalks	\$0	AT-13		Bellingham UGA
57	West Illinois Street	Bellingham City Limits to Marine Dr	Existing 5' marked Bike Lanes + 5' ADA sidewalks	\$0	AT-14		Bellingham UGA
Page 1 Total =				\$9,529,378			

Table 9.7 Whatcom County Active Transportation Improvement Projects, 2026-2045

No.	Project Name	Location/ Project Limits	Financially Feasible Active Transportation Improvement Options	Estimated Project Cost	Active Transportation Network Project ID	Portion in 2026-2031 TIP	Project Comments
58	Everson Goshen Road	SR 542 - E. Smith Rd	Signed Bike Route	\$21,077	AT-15	Yes	Rural County
59	Everson Goshen Road	E. Smith Road-SR 544	Signed Bike Route	\$43,101	AT-16	Yes	Rural County
60	Portal Way	Blaine City Limits to Birch Bay Lynden Dr	Paved Shoulders with Bike Route Signs, Markings (Ped + Bike)	\$986,486	AT-17	Yes	Rural County
61	Birch Bay Lynden Road	Harborview-SR 548	Existing Signed Bike Route	\$0	AT-18	Yes	Birch Bay UGA
62	Birch Bay Lynden Road	SR 548 - Portal Way	Existing Signed Bike Route	\$0	AT-19	Yes	Census Place
63	Portal Way	Birch Bay Lynden Rd to Custer School Rd	Paved Shoulders with Bike Route Signs, Markings (Ped + Bike)	\$494,789	AT-20		Census Place
64	Main Street (Custer)	Portal Way to Custer School Road	Paved Shoulders with Bike Route Signs, Markings (Ped + Bike)	\$33,559	AT-21		Census Place
65	Custer School Road	Main Street (Custer) to Portal Way	Paved Shoulders with Bike Route Signs, Markings (Ped + Bike)	\$35,000	AT-21		Census Place
66	Portal Way	Custer School Rd to Ferndale City Limits	Paved Shoulders with Bike Route Signs, Markings (Ped + Bike)	\$564,649	AT-22		UGA/Census Place
67	Birch Bay Lynden Road	Portal Way to N Enterprise Rd	Existing Signed Bike Route	\$0	AT-23		Rural County
68	Birch Bay Lynden Road	N Enterprise Rd to Lynden city limits	Existing Signed Bike Route	\$0	AT-24		Rural County
69	Kickerville Road	Rainbow Rd - SR 548	Paved Shoulders with Bike Route Signs, Markings	\$530,891	AT-25		Industrial UGA
70	Mountain View Road	Kickerville Rd to Lake Terrell Rd	Signed Bike Route	\$17,930	AT-26		Industrial UGA
71	Lake Terrell Road	Mountain View Rd to Slater Rd	Signed Bike Route	\$21,141	AT-27	Yes	Industrial UGA
72	Slater Road	Lake Terrell Rd to Haxton Way	Signed Bike Route	\$26,474	AT-28	Yes	Rural County
73	Slater Road	Ferndale City Limits to Haxton Way	Signed Bike Route	\$30,180	AT-29	Yes	Rural County
74	Sweet Road	Blaine City Limits to Stradsvold Rd	Paved Shoulders with Bike Route Signs, Markings (Ped + Bike)	\$382,846	AT-30		Blaine UGA
			Alternate ADA Walkway	\$2,143,935	AT-30		Blaine UGA
75	Stadsvold	Sweet Rd-Haynie Rd	Paved Shoulders with Bike Route Signs, Markings	\$144,794	AT-31		Rural County
76	Haynie Road	Stradsvold Rd to Delta Line Rd	Signed Bike Route	\$33,926	AT-32		Rural County
77	Badger Road West	Delta Line Rd to Markworth Rd	Signed Bike Route	\$35,669	AT-33		Rural County
78	Badger Road West	Markworth - SR 539	Signed Bike Route	\$32,199	AT-34		Rural County
Page 2 Total =				\$41,336,486			

Table 9.7 Whatcom County Active Transportation Improvement Projects, 2026-2045

No.	Project Name	Location/ Project Limits	Financially Feasible Active Transportation Improvement Options	Estimated Project Cost	Active Transportation Network Project ID	Portion in 2026-2031 TIP	Project Comments
79	Hampton Road	Lynden City Limits to Van Buren Rd	Existing Signed Bike Route	\$0	AT-35		Rural County
80	Van Buren Road	Hampton Rd to Everson City Limits	Existing Signed Bike Route	\$0	AT-36		Rural County
81	Sunrise Road	W Badger Rd to Birch Bay Lynden Rd	Signed Bike Route	\$21,211	AT-37		Rural County
82	Grandview Road	SR 548 to Point Whitehorn Rd	Paved Shoulders with Bike Route Signs, Markings	\$529,146	AT-38		Industrial UGA
83	Point Whitehorn Road	Grandview Rd to Birch Bay Dr	Paved Shoulders with Bike Route Signs, Markings (Ped + Bike)	\$150,767	AT-39		Census Place
84	Birch Bay Drive	Point Whitehorn Rd to State Park Bdry	Signed Bike Route	\$12,727	AT-40		Birch Bay UGA
85	Birch Bay Drive	State Park Boundary to Birch Bay Berm	Signed Bike Route	\$10,000	AT-40		Birch Bay UGA
86	Mountain View Road	Ferndale City Limits to Lake Terrell Rd	Paved Shoulders with Bike Route Signs, Markings	\$727,874	AT-41		Rural County
87	Haxton Way	Kwina Rd - Cagey Rd	Signed Bike Route	\$27,988	AT-42		Rural County
88	Haxton Way	Cagey Rd to Lummi View Dr	Signed Bike Route	\$20,735	AT-43		Rural County
89	Lummi View Drive	Haxton Way to Lummi Shore Dr	Paved Shoulders with Bike Route Signs, Markings	\$446,065	AT-44		Lummi Nation
90	Lummi Shore Road	Lummi View Dr to Smokehouse Rd	Paved Shoulders with Bike Route Signs, Markings	\$3,273,399	AT-45		Lummi Nation
91	Lummi Shore Road	Smokehouse Rd to Cagey Rd	Paved Shoulders with Bike Route Signs, Markings	\$268,380	AT-46		Lummi Nation
92	Lummi Shore Drive	Cagey Rd to Kwina Rd/Marine Dr	Paved Shoulders with Bike Route Signs, Markings	\$728,637	AT-47	Yes	Lummi Nation
93	Kwina Road	Haxton Way to Lummi Shore Dr	Add signs and markings for 5' marked Bike Lanes	\$10,194	AT-48	Yes	Lummi Nation
94	Marine Drive	Lummi Shore Dr to Marine Dr/Rural Ave	Paved Shoulders with Bike Route Signs, Markings	\$403,163	AT-49	Yes	Census Place
95	Marine Drive	Marine Dr/Rural Ave to Bridge #172	Paved Shoulders with Bike Route Signs, Markings	\$634,120	AT-50	Yes	UGA/Census Place
96	Airport Drive	Marine Drive to Airport Way	Further Study Needed	\$50,000	AT-51		Bellingham UGA
97	Bennett Drive	Marine Dr to Bellingham City limit	Parking Removal (1-side); Buffer Separated Bike Lanes	\$1,511,635	AT-52		Bellingham UGA
Page 3 Total =				\$8,826,041			

Table 9.7 Whatcom County Active Transportation Improvement Projects, 2026-2045

No.	Project Name	Location/ Project Limits	Financially Feasible Active Transportation Improvement Options	Estimated Project Cost	Active Transportation Network Project ID	Portion in 2026-2031 TIP	Project Comments
98	Slater Road	Ferndale City Limits to Northwest Dr	Signed Bike Route	\$10,839	AT-53	Yes	Bellingham UGA
99	Samish Way	Bellingham City Limits to WSDOT Samish Park & Ride	Signed Bike Route	\$32,024	AT-54		Rural County
100	Yew Street Road	Bellingham City Limits to Kingsmill St	Parking Removal (1-side); Signed Bike Route or Marked Bike Lanes	\$2,868,741	AT-55		Bellingham UGA
101	Yew Street Road	Tacoma Avenue to S Samish Way	Further Study Needed	\$100,000	AT-56		Rural County
102	Lakeway Drive-Terrace Ave N-Cable St	Bellingham City Limits to Lakeview St	Parking Removal; 5' Marked and Signed Bike Lanes	\$2,785,839	AT-57	Yes	Bellingham UGA
103	Britton Road	Britton Loop Rd to Bellingham City Limits	Signed Bike Route	\$14,020	AT-58		Bellingham UGA
104	Axton Road West	Northwest Dr to SR 539	Signed Bike Route	\$26,505	AT-59		Rural County
105	Axton Road East	SR 539 to Hannegan Rd	Paved Shoulders with Bike Route Signs, Markings	\$518,620	AT-60		Rural County
106	Pole Road West	Northwest Dr to SR 539	Signed Bike Route	\$28,406	AT-61		Rural County
107	Tyee Drive	Canada Border to Apa Rd	Signed Bike Route	\$15,312	AT-62		Census Place
108	Gulf Road	Tyee Dr to Marine Dr	Signed Bike Route	\$6,930	AT-63		Census Place
109	Marine Drive	Gulf Rd to Edwards Dr	Signed Bike Route	\$8,468	AT-64		Census Place
110	Edwards Drive	Marina Drive to Marine Drive	Signed Bike Route	\$22,042	AT-65		Census Place
111	Marine Drive	Edwards Drive to APA Road	Signed Bike Route	\$20,000	AT-65		Census Place
112	APA Road	Tyee DR to Eastern End	Signed Bike Route	\$15,904	AT-66		Census Place
113	Limestone Road	SR 547 to Tilbury Rd	Off-Street Separated Multiuse Path (<i>Private Developer</i>)	\$1,032,843	AT-67		UGA/Census Place
114	Tilbury Road	Limestone Rd to Cimarron Way	Off-Street Separated Multiuse Path (<i>Private Developer</i>)	\$1,450,830	AT-68		UGA/Census Place
Page 4 Total =				\$8,957,323			
Table 9.7 Grand Total =				\$68,649,228			

Implementation of MMLOS Standards

Transit and Active Transportation LOS standards and performance measures are evaluated in the compilation of the **Annual Concurrency Report** to document progress on completion of the countywide ADA Transition Plan and Active Transportation Network and are used for transportation planning, investment, and partnership purposes, but not for concurrency evaluation in the development review process.

County staff and elected officials use the Annual Concurrency Report to help make informed investment decisions in the annual six-year transportation improvement program (TIP) process. Whatcom County staff works with the Bicycle Pedestrian Advisory Committee (BPAC) to examine these LOS standards, as well as Level of Traffic Stress (LTS) performance measures, to prioritize financially feasible projects and program funding investments on the active transportation network and identify where significant gaps in the system need to be addressed to serve the County's land use plan. The long-term ATN projects are shown above in Figure 9.4 and in Tables 9.7 and 9.8 and these represent the improvements needed to change orange and red LOS segments in Figure 9.3 to green LOS to meet the minimum MMLOS standards that Whatcom County has adopted.

As Whatcom County's population continues to grow, so will the demand for walking, biking, rolling, riding transit buses, and driving private vehicles. It is expected that the primary impact from growth and land use development will be to ensure that facilities for walking, biking, rolling, and riding transit can be provided. This will be especially important in population centers where residential densities are higher and to a lesser degree in unincorporated rural areas of the County.

Based on the financial resources available to Whatcom County over the next 20-years, it is unlikely that the entire ATN can be completed by 2045, but rapid implementation of lower cost, higher LTS walking and biking facilities in rural areas can provide higher awareness of the needs for people walking and biking along County roads and state highways.

Transit

Overview

Whatcom Transportation Authority (WTA) is the primary provider of public transportation services in Whatcom County. WTA provides fixed-route bus service in Bellingham and throughout Whatcom County. Complementary paratransit service is offered in conjunction with broader senior and disabled service under the Specialized Transportation program. WTA also offers vanpool leasing, ride matching and commuter van service from selected markets.

Inventory of Current Facilities

The WTA operates 28 fixed routes, including four high-frequency “Go Lines” and three flex routes, with 63 transit coaches (51 diesel, 8 diesel-electric hybrid, and 4 battery electric). Paratransit service is provided by 51 mini-buses with a capacity to carry 16 passengers each. WTA owns and manages a fleet of 16 vans for its rideshare program. Table 9.8 below summarizes the park & ride facilities that WTA serves along with routes that serve them.

Table 9.8 Whatcom Transportation Authority Bus Service to Park-N-Ride Facilities			
Park-N-Ride Facility	Location	Parking Stalls	Bus Routes
Cordata Station	4194 Cordata Parkway	70	3, 4, 15, 24, 26, 27, 48, 71X, 232, 331
Ferndale Station	1675 Main Street	131	27, 75
Lynden Station	1945 Front Street	89	26
WWU Lincoln Creek	800 Lincoln Street	530	80X, 80S, 190, 190S, 196, 197, 533
WSDOT Chuckanut	999 Burlington Blvd.	369	80X
Alger	Lake Samish Rd (I-5 Exit 240)	54	80X
Birch Bay Square	8115 Birch Bay Square Street	10	75

Source: WTA web site <https://www.ridewta.com/park-and-ride/>

WTA Future Needs

WTA Funding for Capital Projects

WTA is funded primarily from a sales tax-based Public Transit Benefit District that comprises western Whatcom County. Bus fares are collected from transit riders, but the annual revenue from the fare box amounts to between 11 and 12 percent of the annual cost of public transit service. WTA relies on federal and state grant funding sources for major capital investments, such as new buses, station upgrades, and on-board technology improvements.

WTA prepares the annual Capital Improvement Plan (CIP) to maintain and expand its capital assets. The CIP has three fundamental objectives:

- To make efficient use of WTA’s financial resources;
- To identify, prioritize, and schedule future capital investments based on available or anticipated funding;
- To identify funding gaps.

Only capital projects over \$100,000 are included in the Plan, and ongoing costs are not included. In general, projects in the first year of the CIP have secured funding and new projects will be rolled into the 2025 budget. In 2025, the CIP identifies approximately \$19 million in projects of which \$9 million is for rolling stock. Some of the 2025 projects are carry-over from projects budgeted in 2024.

Projects proposed to receive federal funding are rolled into WTA’s Transportation Improvement Plan (TIP) and become part of the Whatcom Council of Governments (WCOG) regional TIP.

WTA Capital Projects

The CIP supports collaborative efforts at the local, regional, state and federal level. The 2025-2030 CIP totals over \$116 million in projects (See Table 9.9). Of that, 17% (\$20 million) is WTA funded, 36% (\$41 million) is secured or anticipated from federal, state, and local grants, and 47% (\$55 million) does not have an identified funding source.

The CIP does not establish larger agency project priorities nor determine staffing needs, and costs are likely to change as capital projects become more defined through additional planning and design work.

Table 9.9 Summaries of WTA Funding Needs and Funding Sources 2025-2030**Summary of Funding Needs by Year 2025 - 2030**

Project Type	2024	2025	2026	2027	2028	2029	Total
Rolling Stock	\$8,750,000	\$12,100,000	\$5,400,000	\$10,670,000	\$3,320,000	\$2,175,000	\$42,415,000
Facilities	\$10,225,038	\$10,452,500	\$4,152,500	\$11,077,500	\$15,477,500	\$21,077,500	\$72,636,538
Technology	\$676,000	\$261,000	\$250,000	\$0	\$200,000	\$0	\$1,387,000
Totals	\$19,281,038	\$22,813,500	\$9,802,500	\$21,747,500	\$19,269,500	\$23,254,500	\$116,438,538

Summary of Funding Sources 2025 – 2030

Project Type	WTA Funds	Federal Formula	Federal Other	State Grants	Local	Unidentified	Total
Rolling Stock	\$7,889,750	\$31,110,000	\$2,000,000	\$1,415,250	\$0	\$0	\$42,415,000
Facilities	11,001,508	\$0	\$0	\$6,510,030	\$525,000	\$54,600,000	\$72,636,538
Technology	\$957,400	\$0	\$0	\$429,600	\$-	\$-	\$1,387,000
Totals	\$19,848,658	\$31,110,000	\$2,000,000	\$8,354,880	\$525,000	\$54,600,000	\$116,438,538

Source: [WTA Six-Year Capital Improvement Plan, 2025-2030](#)

Chapter 10 Stormwater Facilities

Inventory of Current Facilities

The Public Works Department is responsible for design, engineering, and construction of county-owned stormwater facilities. Many stormwater facilities are road-related stormwater conveyance systems such as culverts and ditches on and adjacent to County roads. Others are off right-of-way facilities that control storm flows and improve water quality.

In response to increasing federal and state mandates to manage stormwater and the public's desire to improve stewardship of sensitive watersheds, Whatcom County established a Stormwater group in the Surface Water Division of the Public Works Department in 2005. The Stormwater group is responsible for planning, designing, engineering, and construction of stormwater facilities. Inventories of existing stormwater facilities are maintained by the Public Works Department. The Engineering Services Division maintains an inventory of all road-related facilities. The Stormwater group maintains an inventory of public and private stormwater facilities in the area covered by the County's NPDES Phase II permit for Municipal Separate Storm Sewer Systems. This inventory includes ditches, culverts, catch basins, vaults, ponds, and swales. Stormwater and drainage improvement projects completed since 2015 are listed in Table 10.1. A complete list of stormwater projects with descriptions are on the Whatcom County website under "Stormwater Projects".

Table 10.1 Completed Stormwater Improvement Projects

Project Name	Watershed	Year Completed
Seaview Dr Drainage Upgrade	Birch Bay	2015
Birch Point Collaborative Drainage Project	Birch Bay	2016
Cedar Hills – Euclid Stormwater Improvements	Lake Whatcom	2016
Cottonwood Dr. Stormwater Improvements	Birch Bay/Drayton Harbor	2017
North Cottonwood Neighborhood (Hazel Lane) Stormwater Improvements	Birch Bay/Drayton Harbor	2018
Agate Bay Improvements Phase 1 & 2	Lake Whatcom	2018-2019
Birch Bay & Point Whitehorn Rd Drainage Improvements	Birch Bay	2020
Northshore/Edgewater Stormwater Improvements	Lake Whatcom	2020

Leeward Way Drainage Improvements	Lummi Bay	2020-2021
Harborview Rd & Birch Bay Dr Storm Drainage Phase 1 & 2	Birch Bay	2021
Silver Beach Creek Phase 1 - Woodlake	Lake Whatcom	2021
Holeman Ave Stormwater Improvements	Birch Bay	2024

Future Needs

An increasing emphasis on the protection of sensitive watersheds has resulted in the adoption of comprehensive stormwater plans, including plans for Lake Whatcom, Birch Bay and lake Samish Basin. The adopted plans identify work towards planning, design, engineering, and construction of capital projects intended to address stormwater issues.

In addition, the County has adopted a Stormwater Management Program in accordance with the NPDES Phase II permit. This program applies to about 15,000 acres of unincorporated lands, including the Birch Bay UGA, Ferndale UGA, Bellingham UGA and other lands along the south shore of Lake Whatcom. Goals of the Stormwater Management Program include detecting and eliminating illicit discharges to surface waters, controlling runoff from new development, redevelopment, and new construction, pollution prevention and operation and maintenance for municipal operations, educating the public, monitoring stormwater, and collecting and reporting data on the Program.

Capital Projects and Funding

Stormwater projects anticipated in the seven-year planning period include approximately \$18.2 million in improvements. These projects, and their associated funding sources, are shown in the *Seven-Year Capital Improvement Program for Whatcom County Facilities*. These costs would be paid by Real Estate Excise Tax (REET), Lake Whatcom Stormwater Utility, grants, Road fund, funding from BBWARM, Flood fund, and FEMA funds. The County will also monitor the adequacy of stormwater facilities throughout the planning period and consider capital improvements and maintenance projects if warranted in the future.

Chapter 11 – Water Systems

Water Systems

Planning relating to public water systems is carried out in the *Whatcom County Coordinated Water System Plan* (CWSP), individual water system plans, and this Capital Facilities Plan. An introduction to the CWSP is presented below. For purposes of this Capital Facilities Plan, water systems are divided into major systems that serve urban growth areas (urban water systems) and other systems that have 50 or more connections. This chapter addresses urban water systems, including information summarized from the individual water system plans. Information about other systems with 50 or more connections is included in the *Coordinated Water System Plan*.

Coordinated Water System Plan

The CWSP (2025) is a plan for public water systems that identifies the present and future needs of the systems and sets forth means of meeting those needs in the most efficient manner possible. The Whatcom County Council established the planning area, called the Critical Water Supply Service Area (CWSSA), for the original CWSP effort in 1993, and retained the same area for the 2000, 2016, 2019, and the 2025 CWSP updates. The CWSSA includes all of Whatcom County west of the Mount Baker-Snoqualmie National Forest Boundary excluding certain portions of the Lummi and Nooksack Indian reservations.

The CWSP was prepared under the direction of the Water Utility Coordinating Committee (WUCC). The WUCC included representatives of individual water utilities located in the CWSSA with more than 50 connections that chose to participate, as well as representatives of the Washington State Department of Health, Whatcom County Health Department, Whatcom County Planning & Development Services, Whatcom County Public Works, and the Whatcom County Council. The CWSP review was conducted with the primary objective of supporting the public drinking water supply needs of the County and achieving coordination between water services, the Growth Management Act, and the *Whatcom County Comprehensive Plan*. The CWSP addresses a number of topics, including population, water demand, existing water systems, water utility service areas, minimum design standards, utility service review procedures, receivership of failing systems, issues with potential implications for public water systems, and plan implementation.

The CWSP contains a water rights capacity analysis to compare water system's existing water rights, and/or existing intertie agreements, against current and anticipated future demands in an effort to determine whether systems are projected to meet their future requirements, have surplus water, or have insufficient future water rights. Based on the

results of the water rights analysis (which take into account existing intertie agreements), the existing and projected population, and the historic and projected water demand, a water rights status for each Group A community public water system is assigned. Analyses prepared in the individual water system plans will be more accurate and should be utilized if available (CWSP, located in Chapter 3, Appendix 1).

Urban Water Systems

Inventory of Current Facilities

This section of the Capital Facilities Plan inventories the 14 primary water systems that provide water service to Whatcom County's UGAs. Table 11.1 provides information relating to existing connections, water rights, contracts for water, supply, storage, and water sources.

Table 11.1 Water Supply Inventory by Service Provider

Service Provider	Existing Connections	Approximate Available Connections for Future Growth	Primary Water Source
Birch Bay Water & Sewer District	6,440	Unspecified	City of Blaine
City of Bellingham	26,283	Unspecified	Lake Whatcom
City of Blaine	2,634	Unspecified	Wells
City of Everson	1,000	Unspecified	Wells
City of Ferndale	7,718	Unspecified	Wells
City of Lynden	7,784	Unspecified	Nooksack River
City of Nooksack	625	Unspecified	City of Sumas
City of Sumas	838	Unspecified	Wells
Columbia Valley Water District	1,811	Unspecified	Wells
Lake Whatcom Water & Sewer District	3,984	15	Lake Whatcom
PUD 1	N/A	N/A	Nooksack River
Water District No. 2	566	Unspecified	City of Bellingham
Water District No. 7	665	446	City of Bellingham
Water District No. 13	366	889	Wells

Source: Whatcom County Coordinated Water System Plan (September 2025)

Future Needs

Water system plans provide a design standard, generally expressed as water consumption in gallons/day per equivalent residential unit (ERU). When applying this

standard to growth projections and comparing to the water source capacity, a water system provider can obtain a sense for how planned growth will affect water service into the future.

Water service providers prepare water system plans, including a program of capital improvements that address the system’s anticipated needs within their designated water service area, consistent with local land use plans. Table 11.2 identifies the purveyor’s design standards.

Table 11.2 Design Standards

Service Provider	Design Standards (gallons/day per ERU)
Birch Bay Water & Sewer District	116-135
City of Bellingham	199
City of Blaine	180
City of Everson	250
City of Ferndale	175
City of Lynden	122
City of Nooksack	175
City of Sumas	282
Columbia Valley Water District	215
Lake Whatcom Water & Sewer District	150-250
PUD 1	N/A ¹
Water District No. 2	170 ²
Water District No. 7	180-187
Water District No. 13	181

1 PUD No. 1 serves industrial and commercial properties.

2 2023 Water System Plan

Population

Table 11.3 provides an overview of the planning horizon year and horizon year population for the latest water system plans in comparison to Whatcom County Comprehensive Plan’s population projections for the year 2045. As can be seen by a review of the table, most urban water systems plan conservatively for drinking water needs, particularly given the time it takes to seek new water supplies to serve growth.

Table 11.3 Population Comparison: Water Plans and 2045 Population Projection

Service Provider	Year of Plan	Horizon year of Capital Plan	Capital Plan Population	County's 2045 Population Projection Growth
Birch Bay Water & Sewer District	2020	2038	13,643	13,783
City of Bellingham	2025	2044	130,419 ¹	128,831
City of Blaine	2019	2038	10,851 ²	9,457
City of Everson	2026	2045	4,579	3,662
City of Ferndale³	2016	2036	20,072	20,364
City of Lynden	2019	2040	21,082	17,823
City of Nooksack	2026	2045	2,425	2,385
City of Sumas	2025	2045	2,810	2,493
Columbia Valley Water District⁴	2013	2045	4,714	2,744
PUD 1	2022	N/A ⁵	N/A ⁵	N/A ⁵
Lake Whatcom Water & Sewer District	2018	2036	12,016 ⁶	10,597
W.C. Water District 2⁶	2023	2043	1,905 ⁷	1,437
W.C. Water District 7	2021	2040	1,938 ⁷	1,992
W.C. Water District 13	2021	2040	1,170 ⁸	1,711

N/A = Not Available

- 1 The *City of Bellingham Draft Water System Plan* (March 2025) contains a medium population projection of 130,419 for the year 2045.
- 2 Projected service area population per the *Blaine Comprehensive Water System Plan* (2016).
- 3 These jurisdictions have not updated their Water System Plan since 2016, and no changes have been made to their data since the previous *Whatcom County Capital Facilities Plan* (2016).
- 4 Horizon year and projected population for the Columbia Valley UGA per the *Whatcom County Coordinated Water System Plan* (September 2025).
- 5 Since PUD 1 provides retail water service only to areas characterized by and designated for industrial and commercial uses, the District's updated WSP (January 2022) does not provide population projections or a horizon year. PUD 1 also owns and operates the Grandview potable water supply system – retail.
- 6 The *Lake Whatcom Water and Sewer District Water System Comprehensive Plan* (June 2018) anticipates 4,506 ERUs in 2036 (Appendix A, Exhibit 2), which equates to a population of about 12,016 using average household sizes described in the *Water System Comprehensive Plan* (p. 18).
The *Whatcom County Water District No. 2 Water System Plan* projects future Equivalent Residential Units (ERUs) rather than population. The district plans to serve 827 ERUs by 2043. The *Whatcom County Coordinated Water System Plan* (September 2025) does not identify horizon year or capital plan projection for this district.
- 7 Service area population projections per the *Whatcom County Water District No. 7 Water System Plan* (June 2021). Water District 13 could potentially serve a total of 1,400 residential connections (*Whatcom County Water District No. 13 Small Water System Plan 2020*, p. 16).
- 8 Population Estimates from the *Whatcom County Population and Employment Allocations by Special District* (June 2025).

Capital Projects and Funding

Water services and capital improvements are funded primarily by the users of the system through water rates and general facilities charges. Water rates can be adjusted

to match the funding required for capital and operational needs. Connection fees are usually charged to developers when a development necessitates expansion of the District's capacity. There are also governmental funding programs. These include the Public Works Trust Fund, a revolving loan fund designed to help local entities through low-interest loans, and the Drinking Water State Revolving Fund, which involves low-interest federally funded loans.

Birch Bay Water and Sewer District

The Birch Bay Water and Sewer District provides service within and adjacent to the Birch Bay Urban Growth Area. The district obtains its water supply from the City of Blaine (wells). The district's facilities include over 3.1 million gallons of storage in three reservoirs, four booster pump stations, and nearly 80 miles of water transmission and distribution piping. The system includes multiple interties with the City of Blaine system and an emergency intertie with the Bell Bay Jackson Water Association system. The district's *Comprehensive Water System Plan* (June 2020) indicate that existing water supply is sufficient through 2038 at the forecast demand (page ES-4). Additionally, the District may be able to use more than their contract demand amount, but such use would be subject to premium pricing and penalties per the city supply contract. However, supply upgrade projects will be necessary in both the city and district systems over the 20-year planning period in order to supply the water to the District at adequate rate and pressure.

Besides its residential and commercial customers, the District provides water supply to the BP Cherry Point Refinery. At the time of completion of the 2020 plan, the District provided this service through a water service agreement with PUD 1. The district's 2020 *Comprehensive Water Plan* is based on service to 13,634 persons by year 2038. The plan is based on an annual water demand increasing from 116 gpd/ERU in 2015 to 135 gpd/ERU in 2036 as seasonal homes transition into full time residences. The district has a contract with the City of Blaine to provide a maximum supply of 3.73 million gallons per day. Birch Bay's *Comprehensive Water Plan* indicates that it will extend future service areas to areas within the District boundaries and provides future connection policies.

City of Bellingham

The city owns and manages its water system for municipal water supply purposes. These purposes span a broad range of water uses, including residential, commercial, industrial, and government. The water system currently consists of 13 pressure zones, 13 reservoirs, 15 pump stations, 6 pressure-reducing valves, and approximately 440 miles of transmission and distribution pipelines. Water supply sources for the water treatment plant (WTP) include Lake Whatcom and the Middle Fork of the Nooksack River, both located on the east side of the service area. Lake Padden is also a source of municipal supply for the WTP system, located to the south of the service area (*City of*

Bellingham Water System Plan, March 2025). The Bellingham water system has interties with Water District 2, Water District 7, the Lake Whatcom Water and Sewer District, and five other systems. The projected average daily demand for the water system is 12.3 million gallons per day in 2044 and the projected maximum daily demand is 19.1 million gallons per day in 2044. The City of Bellingham has adequate water rights to meet projected demand over the planning period. The *City of Bellingham Water System Plan* contains a capital improvement program with approximately \$531 million in capital projects (2025-2044). These projects include pipeline improvements, water main replacements, reservoir rehabilitations, water treatment plant improvements, installing booster pump stations, and studies. Revenue sources for system improvements include water rates, grants, loans, utility local improvement districts, and revenue bonds. The city's financing program in the *Water System Plan (2025)* is adequate to cover planned capital improvements

City of Blaine

The *City of Blaine Comprehensive Water System Plan (2019)* indicates that the city maintains a water system consisting of wells, a water treatment plant, booster pumps, and five water reservoirs with a storage capacity of 4.59 million gallons. The Blaine water system serves city residents and provides water, per terms of wholesale supply agreements, to both the Birch Bay Water and Sewer District and the Bell Bay Jackson Water Association. The city provides service throughout the current city limit, with the exception of a few parcels that are presently served directly by the Birch Bay Water and Sewer District. The city also serves the Pipeline Road UGA, but service to the Shipyard UGA is by Birch Bay Water and Sewer District. The city also serves an area of unincorporated Whatcom County southeast of the city.

The projected average daily demand for the Blaine water system is approximately 2.87 million gallons per day in 2038 and the projected maximum daily demand is approximately 5.9 million gallons per day in 2038. The *City of Blaine Comprehensive Water System Plan (2019)* documents water rights in the form of a claim, permits and certificates in the amount of 5,300 gallons per minute (instantaneous). Analysis of the year 2038 forecast demand to current water rights indicates that the city has adequate water supply to meet the needs of population growth over the 20 year period.

The *City of Blaine Comprehensive Water System Plan (2009)* contains a capital improvement program with approximately \$23 million in capital projects over the 20 year planning period (2019-2038). Several of those projects have been completed since 2019. Projects include water main improvements, reservoir upgrades, and improving storage capacity. Anticipated revenue sources for capital improvements include grants, loans, connection fees, water rates and developer constructed facility contracts. The city's financing plan projects adequate revenues to cover expenses over the 20-year planning period.

City of Everson

The City of Everson Water System Draft Plan Update 2024 indicate that the City of Everson maintains a water system consisting of a well field with three wells, booster pumps, three 160,000 gallon water reservoirs, and over 14.5 miles of water lines (p. 4). The Everson water system also has an intertie with the City of Nooksack Water System for use during maintenance or an emergency (p. 2). The projected average daily demand for the water system is 429,355 gallons per day in 2045 and the projected maximum daily demand is 928,605 gallons per day in 2045 (p. 38). The City of Everson's water system has source capacity to meet the projected need over the 20-year planning period (p. 48). The City of Everson Water System Plan Update 2024 contains a capital improvement program with approximately 15 million in capital projects over the next 20 years (2024-2045). These projects include water main improvements, an additional deep well source (to replace two existing shallow wells), water treatment facilities, and an additional 160,000 gallon storage reservoir (pp. 94-99). Anticipated revenue sources for system improvements include grants, loans, connection fees, water rates, and developer constructed facility contracts (p. 102). The city's financing plan projects adequate revenues to cover expenses over the 20-year planning period (Appendix D).

City of Ferndale

The *City of Ferndale Water System Plan* (2016) indicates that the city maintains a water system consisting of wells, a water treatment plant, three water reservoirs with a storage capacity of almost three million gallons, two pump stations, one pressure booster station and 73 miles of water lines. In December 2011, Ferndale converted to a groundwater supply with greensand filtration for its drinking water. Previous to this, it purchased industrial grade water from PUD No.1 and treated the water at its own surface water treatment plant. In October 2014, Ferndale added a reverse osmosis system to treat its groundwater supply to reduce hardness. The city no longer purchases water from PUD No. 1. The Ferndale water system has interties for emergency use only with Mountain View Water Association, Northwest Water Association, Thornton Water Association and North Star Water Association (p. 2-18). The projected average daily demand for the Ferndale water system is 2.27 million gallons per day in 2036 and the projected maximum daily demand is 3.96 million gallons per day in 2036 (p. 2-15). The *City of Ferndale Water System Plan* indicates that the city has adequate water rights to meet the needs of population growth over the 20 year period (p. 1-12). The *City of Ferndale Water System Plan* contains a capital improvement program with approximately \$20 million in capital projects over the next 20 years (2016-2036). These projects include water main upgrades and replacements, increasing well production and redundancy, and constructing additional storage (p. 3-16). Anticipated revenue sources for capital improvements include grants, loans, bonds, connection fees, water rates and developer

constructed facility contracts. If applicable, the city may also utilize the utility local improvement district process (Ch. 9). The city has maintained budgetary controls over the water system. Rates and connection fees will continue to be set at levels required to finance operation, maintenance, and capital improvements (Ch. 9).

City of Lynden

The *City of Lynden Water System Plan* (2019) indicates that the City of Lynden maintains a water system consisting of a Nooksack River water intake structure, water treatment plant, booster pumps, two water reservoirs with a storage capacity of approximately 8.58 million gallons, and 87 miles of water lines. The City's 8 million gallons per day Water Treatment Plant went online September 23, 2015. The plant doubles treatment capacity and includes grit removal and sedimentation basins equipped with plate settlers to handle the heavy sediment load from the Nooksack River. The facility also features high rate deep bed gravity filters, and a combination of UV disinfection and chlorine to disinfect the water. The Lynden water system provides wholesale water supply to two water association systems. The projected average daily demand for the Lynden water system is 1880 gallons per day in 2040 and the projected maximum daily demand is 4,670 gallons per day in 2040. The City believes it has adequate water supply to meet the needs of population growth over the 20 year period. However, the City of Lynden and Ecology have an existing disagreement over the City's water rights. The City has entered into a memorandum of agreement (MOA) with Ecology to address long-standing water right issues between the City and Ecology. Resolution of water supply issues for the City of Lynden is important for future planning in the City's water service area. The City of Lynden's capital improvement program includes \$9 million in improvements for a 10-year planning period (2019-2030). Improvements include water main replacement, reservoir updates, and industrial condensate line. Anticipated revenue sources for capital improvements include grants, loans, connection fees, water rates and developer constructed facility contracts. The City's financing plan projects adequate revenues to cover expenses over the 10-year planning period.

City of Nooksack

The *City of Nooksack Water System Plan* (2012), the *City of Nooksack Water System Plan Update* (2016), and the *City of Nooksack Water System Plan Revised 2026* indicate that the City of Nooksack obtains all its water from the City of Sumas (*Water System Plan Update*, p. 9). Nooksack maintains a water system consisting of booster pumps, water reservoirs shared with the Nooksack Valley Water Association with a capacity of 700,000 gallons (one-half of which is owned by Nooksack), and over 8 miles of water lines (*Water System Plan*, pp. 9-10). The Nooksack water system has interties with the Nooksack Valley Water Association and, for emergency purposes, with the Everson water system (*Water System Plan*, pp. 10 & 13). The projected city maximum

daily demand is 350 (gdp/ERU) in 2045 calculated as twice the average daily demand (Column g, Table D-2). The City of Nooksack's water system has the capacity to meet the projected demand over the 20-year planning period (*Water System Plan Update*, Tables D-2 and D-3). The *City of Nooksack Water System Plan Update* contains a capital improvement program with over \$1.3 million in capital projects over the next 20 years 2025-2045(). These projects include water line, standpipe and hydrant improvements (*Water System Plan Update*, p. 67). Anticipated revenue sources include water rates, connection fees, utility taxes, interest, reserves, grants, and loans. The City's financing plan projects adequate revenues to cover expenses over the six-year planning period (*Water System Plan Update*, pp. 70-74).

City of Sumas

The *City of Sumas Water System Comprehensive Plan (2025)* indicates that the City of Sumas maintains a water system consisting of two well fields with seven wells, booster pumps, a 500,000 gallon water reservoir (which is directly adjacent to, and tied into, a 500,000 gallon water association reservoir), and over 19 miles of water lines (p. 3-2). The City of Sumas sells water wholesale to the Sumas Rural Water Association, the Nooksack Valley Water Association, and the City of Nooksack (p. 1-15). The water system plan indicates that, based on a 2015 water supply agreement, Sumas also sells water wholesale to the Meadowbrook Water Association (pp. 1-10). As presented in the City's water system plan, the projected average daily demand for the City of Sumas is 289,900 gallons per day in 2045 and the projected maximum daily demand is 579,000 gallons per day in 2045 (pp. 3-25). The City of Sumas' water system has source capacity to meet the annual projected need over the 20-year planning period through the year 2045 (pp. 3-25). Sumas has sufficient storage capacity to support planned growth through 2045 (pp. 3-25). The Water System Plan includes over 6.3 million in projects with prioritization based on need, timing of development and potential for combining projects with other capital improvement projects (p. 8-1 & 8-2).

Columbia Valley Water District

The *Columbia Valley Water District 2013 Water System Plan Update (2013)* indicates that the Columbia Valley Water District maintains a water system consisting of three wells, booster pumps, four reservoirs with a total storage capacity of 762,000 gallons, and approximately 20 miles of water lines (pp. 8, 9 and 11). The district has explored an emergency intertie with Water District 13 (p. 22). The projected average daily demand for the water system is 279,450 gallons per day in 2030 and the projected maximum daily demand is 536,600 gallons per day in 2030 (pp. 45-47). The district has source capacity to meet the projected need over the 20-year planning period through the year 2030 (pp. 45-47). The *Columbia Valley Water District 2013 Water System Plan Update* contains a capital improvement program with almost \$7.9 million in capital projects (2016-2022). These projects include water line improvements, fire hydrant replacements,

pump replacements, and a potential intertie (Figure 8-2). Potential revenue sources for system improvements include cash reserves, general facilities charges, water sales revenue, local facilities charges, developer participation, utility local improvement district financing, bond financing, grants, and loans (pp. 77-82).

PUD 1

PUD 1 provides water service to both the Grandview industrial/commercial service area north of Ferndale, as well the Cherry Point UGA (an industrial area). PUD 1's *Comprehensive Water Plan* (2022) does not measure water demand in population as most other WSPs do. The majority of the District's water service customers are industrial and commercial customers. The PUD's *Comprehensive Water Plan* indicates that it has sufficient water supply to meet the District's needs to the end of the District plan's 20-year planning period. The plan includes a series of capital improvements including the acquisition of other potable water system treatment plants and water distribution and storage improvements. Although the District's plan does not include maps showing future water service extensions, portions of the narrative on future water service indicate the District's future water service plans to serve its entire district.

Lake Whatcom Water and Sewer District

The *Lake Whatcom Water and Sewer District Water System Comprehensive Plan* (2018) indicates that the District maintains a water system consisting of a water intake system, water treatment plant, booster pumps, water reservoirs with a combined storage capacity of almost 2.56 million gallons, and approximately 68 miles of water lines (pp. 11-12). The district's water system has interties with the City of Bellingham water system, both for purchased water supply and for emergency use. The projected average daily demand for the water system is 706,875 gallons per day in 2036 and the projected maximum daily demand is 1,275,180 gallons per day in 2036. The Lake Whatcom Water and Sewer District water system has source capacity to meet the projected demand through 2036 and for full build-out. Appendix I contains a capital improvement program for both sewer and water projects. This plan contains \$958,947million in water system capital projects (2018-2027). These projects include water system rehabilitation and replacement projects, treatment plant improvements, water line replacements, and reservoir maintenance. Anticipated financing methods for system improvements include connection fees, water rates, utility local improvement districts, developer extension agreements, loans, and bonds.

Water District 2

The *Whatcom County Water District # 2 Water System Plan* (2023) indicates that the District obtains all its water from the City of Bellingham, through an intertie with the City (p. 1-3). Water District 2 maintains a water system consisting of approximately 15 miles

of water lines. The District does not have storage reservoirs or pumps, but relies on the City of Bellingham for storage and pressure (p. 1-3). The projected average daily demand without conservation for the water system is approximately 153,400 gallons per day in 2043 (derived from the *Water System Plan*, p. 2-9). The District has a contract in place with the City of Bellingham that will provide adequate water to meet this demand over the planning period.

Water District 7

The *Whatcom County Water District No. 7 Water System Plan* (2021) indicates that the District obtains all its water from the City of Bellingham, through an intertie with the city. Water District 7 maintains a water system consisting of booster pumps, water reservoirs with a capacity of 485,000 gallons, and over 13 miles of water lines. The projected average daily demand for the water system is approximately 187 gallons per day per ERU in 2040. The projection of connections for the year 2040 is 775 connections serving a population estimated to be 1,938 persons. The plan's capital improvement program indicates several projects including repairs, pipe replacements, and water main improvements (2019-2040). Revenue sources will be water rate increases as necessary to repay loans likely from the United States Department of Agriculture, Drinking Water State Revolving Fund, or Public Works Trust Fund.

Water District 13

The *Whatcom County Water District No. 13 Small Water System Plan* (2020) indicates that Water District No.13 maintains a water system consisting of two wells, two reservoirs with a total storage capacity of nearly 300,000 gallons, and associated water lines. The projected average daily demand for the water system is 181 gallons per day per ERU in 2040 and the projected maximum daily demand is estimated at 362gallons per day per ERU in 2040. The district has source capacity to meet the projected need over the 20-year planning period through the year 2040. The *Whatcom County Water District No. 13 Small Water System Plan* contains a capital improvement program with \$931,000in capital projects. These projects include replacing lines, repairing leaks, rate study, and water main improvements.

Chapter 12 – Sewer Systems

Sanitary Sewer

There are a total of 10 wastewater collection systems and seven wastewater treatment plant (WWTP) facilities that serve UGAs in Whatcom County. Most of the facilities provide services within city limits with plans for future service to areas designated as UGAs. However, some systems provide service to unincorporated UGAs (Birch Bay Water & Sewer District and Water District 13).

Inventory of Current Facilities

The following cities and sewer districts (in alphabetical order) provide sanitary sewer service to UGAs in the County:

- **City of Bellingham** maintains a wastewater collection system within its city limits and sewer service zones within the UGA. The city operates a wastewater treatment plant that is also used by Lake Whatcom Water and Sewer District. The city plans future service within its UGA.
- **Birch Bay Water & Sewer District** owns and operates a wastewater collection and treatment system that serves the Birch Bay UGA, a portion Cherry Point UGA, and a parcel within the Blaine UGA.
- **City of Blaine** provides a collection and a wastewater treatment system for property within the city limits. The city also provides contract service to the Harbor Shores Sewer Association in the city's southern UGA area. Blaine's wastewater treatment is handled by the Lighthouse Point Water Reclamation Facility, constructed in 2010. The facility, which generates Class A reclaimed water, was a full replacement of the city's prior treatment plant. The city plans future sewer service to areas within its UGA, and has adequate expansion capacity in the Lighthouse Point facility.
- The **City of Everson** maintains a collection system to serve property within the city limits. The city's sewer system also provides wastewater treatment for the City of Nooksack. Both cities provide funding for operation and maintenance of the treatment facility. The city plans future sewer service to areas within its UGA.
- The **City of Ferndale** provides sewer collection and treatment facilities for property within the city limits and plans future collection and treatment to the city's UGA. The city also serves two areas outside the UGA, east of the city, but has no plans to expand service in these areas.
- **Lake Whatcom Water & Sewer District** maintains a sanitary sewer collection system that serves the Geneva UGA, east of the city limits, and other areas around Lake Whatcom. The district relies upon the City of Bellingham wastewater system for treatment.
- The **City of Lynden** provides sewer collection and treatment facilities for property within the city limits and plans future collection and treatment to the city's UGA upon

annexation. The city also operates permitted composting facilities for beneficial use of biosolids.

- **City of Nooksack** constructed a wastewater collection system for property within the city limits in 1987. The city has plans to provide future service to unserved properties within its city limits and to properties within its associated UGA. By agreement with the City of Everson, Nooksack pumps its sewage for treatment at the Everson Wastewater Treatment Plant. Nooksack also provides funding for the operation and maintenance of the Everson Wastewater Treatment Plant.
- The **City of Sumas** provides a wastewater collection system for property within the city limits. Since 1999, the city has had wastewater treatment provided at a large regional treatment facility in Abbotsford, BC owned and operated by Fraser Valley Regional District. The city plans to extend sewer service to UGA property upon annexation.
- **Whatcom County Water District 13** provides wastewater collection and treatment to a portion of the Columbia Valley UGA in unincorporated Whatcom County.

An inventory of existing wastewater facilities located in the County is presented in the table on the following pages. The table summarizes wastewater volume treated per day, total treatment capacity, and surpluses or deficits for the wastewater treatment systems expressed in million gallons per day (mgd). Existing population is also noted.

Table 12.1 Wastewater System Inventory

Year of Plan(s)	Service Provider	Collection System		Treatment			Service Area	Notes
		Miles of Pipe	Existing Conditions	Existing Average Annual Flow (mgd)	Design Flow (mgd)	Surplus / Deficit (mgd)	2023 Population Estimate ¹	
2019 & Revised 2020	Birch Bay Water and Sewer District (BBWSD)	63	The collection system is composed of approximately 63 miles of gravity and pressure sewer lines and 11 pump stations.	1.27	1.44	0.17	9,606	The WWTP discharges to the Strait of Georgia.
2009 and 2016	City of Bellingham	323	Bellingham's sewer service area covers approximately 39 sq. miles. The city operates and maintains approximately 315 miles of sewer mains and 8 miles of force mains. There are 29 pump stations in the system.	12.73	34.3	21.57	104,576	The WWTP discharges to the Bellingham Bay.
2004 and 2005 with May 2016 Technical Memo	City of Blaine	40	The existing service area for the Blaine sewage treatment system is in the Blaine city limits. In July 2010, the Lighthouse Point Water Reclamation Facility came on-line with capacity to treat 1.54 MGD. The City of Blaine wastewater collection system consists of gravity sewers, force mains, and eight pumping stations.	0.5	1.54	1.04	4,776	The WWTP discharges to Semiahmoo Bay.
2025	City of Everson	10	The collection system has over 10 miles of gravity and force main pipe and 8 wastewater pump stations within city limits. The Everson WWTP treats wastewater from both Everson and Nooksack.	.330	0.661	0.331	2,563	The WWTP discharges to the Nooksack River.
2016	City of Ferndale ²	67	Ferndale's collection system has 58 miles of gravity and force main piping and 17 pump stations.	1.62	4.10	1.9	12,612	The WWTP discharges to the Nooksack River.

Year of Plan(s)	Service Provider	Collection System		Treatment			Service Area	Notes
		Miles of Pipe	Existing Conditions	Existing Average Annual Flow (mgd)	Design Flow (mgd)	Surplus / Deficit (mgd)	2023 Population Estimate ¹	
2016	City of Lynden	62	There are approximately 62 miles of pipe and 14 operating wastewater pump stations within the City of Lynden sewage collection system. The Lynden WWTP is an extended aeration secondary treatment plant that uses oxidation ditches and UV disinfection to treat effluent prior to discharge in the Nooksack River.	1.11	2.18	1.07	13,099	The WWTP discharges to the Nooksack River.
2012 (Amended in 2016) Amended in April 2026	City of Nooksack	10	The collection system consists of almost 8 miles of gravity and force main pipe, 4 wastewater pump stations, and 2 grinder pumps. The city's sewage is treated at the Everson WWTP.	0.330	0.661	0.331	1,379	
2025	City of Sumas	10	The City of Sumas contracts with the City of Abbotsford, Canada for sewer service. Sumas sewage flows account for less than 2% of the volume received by the JAMES Treatment Plant in Abbotsford. The City contract allows for a maximum treatment of 0.4 mgd.	0.227	0.400	0.173	1,453	Plan date listed is the date of the agreement with the City of Abbotsford, British Columbia which goes through 2028. Approximately 0.110 mgd of the existing flow is generated by a single industrial user, the PSE cogeneration plant.
2020	Lake Whatcom Water and Sewer District	87	The district does not have a sewage treatment plant. The district contracts with the City of Bellingham to treat and dispose of domestic sewage. The district operates and maintains gravity and pressure sewer lines and 27 sewage pump stations.	0.828	1.382	0.544	9,365	The 2014 agreement between the District and the City of Bellingham is for maximum peak instantaneous flows of up to 2,400 gallons per minute.

Year of Plan(s)	Service Provider	Collection System		Treatment			Service Area	Notes
		Miles of Pipe	Existing Conditions	Existing Average Annual Flow (mgd)	Design Flow (mgd)	Surplus / Deficit (mgd)	2023 Population Estimate ¹	
2025 ³	Water District 13	4	Water District 13 owns, operates, and maintains a domestic wastewater collection system consisting of two pump stations, approximately 4 miles of pipe, a wastewater treatment plant, and a force main that transfers flows from the treatment plant to the drain field.	0.050	0.125	0.07563	830	

1. Population Estimates from the *Whatcom County Population and Employment Allocations by Special District* (June 2025)

2. Update per Email with Mike Olinger of 6/13/25.

3. Updated per Cheryl (Thompson) Klessig email of 6/26/25. Draft plan in process of being adopted.

Future Needs

Sewer provider design standards are provided in Table 12.2, which are based on the estimated wastewater usage (gallons/day for each person or equivalent residential unit).

Table 12.2 Design Standards

Service Provider	Design Standards	
Birch Bay Water and Sewer District	70	gallons/capita/day
City of Bellingham	102	gallons/capita/day
City of Blaine	184	gallons/ERU/day
City of Everson	96	gallons/capita/day
City of Ferndale	145	gallons/capita/day
City of Lynden	100	gallons/capita/day
City of Nooksack	89	gallons/capita/day
City of Sumas	80	gallons/capita/day
Lake Whatcom Water and Sewer District	100	gallons/capita/day
Water District 13	67	gallons/capita/day

Source: Derived from individual sewer plans. Blaine figure is from City of Blaine in an e-mail of May 12, 2016. Sumas figure is from the Sumas City Planner in an e-mail of March 7, 2016.

Table 12.3 identifies projected treatment capacity in 2032 for each sewer provider that serves a UGA, given planned growth for these areas.

Table 12.3 Sewer Treatment Capacity 2032

Service Provider	Current Treatment Capacity (MGD)	2032 Treatment Capacity Surplus (Deficit) expressed in MGD
Bellingham	34.300	21.57
Birch Bay Water & Sewer	1.44	0.00
Blaine	1.54	0.75
Everson	0.441	0.124
Ferndale	6.37	3.36
Lynden	2.18	0.48
Nooksack	0.220	0.062
Sumas	0.400	0.150
Lake Whatcom Water & Sewer District	1.382	0.444
WC Water District 13	0.125	0.039

- 1 Per 2028 forecast of future flows in the *Comprehensive Sewer System Plan*, Birch Bay Water and Sewer District, Revised April 2020. The next facility upgrade was planned for completion by 2023. Actual population and flows have not met forecasted levels. Treatment capacity appears adequate for the near future. Facility upgrades have been deferred.

Table 12.4 identifies projected treatment capacity in 2045 for each sewer provider that serves a UGA, given planned growth for these areas.

Table 12.4 Sewer Treatment Capacity 2045

Service Provider	Current Treatment Capacity (MGD)	2045 Treatment Capacity Surplus (Deficit) expressed in MGD
Bellingham	34.300	.800
Birch Bay Water & Sewer	1.44	(0.41)
Blaine	1.54	0.39
Everson	0.441	0.000
Ferndale	6.37	2.27
Lynden	2.18	0.13
Nooksack	0.220	0.000
Sumas	0.400	0.105
Lake Whatcom Water & Sewer District	1.382	0.265
WC Water District 13	0.125	0.006

Population and Capital Projects

Population

Table 12.5 identifies each sewer provider's latest sewer plan horizon year and population, as well as the County's 2045 population projection. This table serves to provide an order of magnitude check with respect to the population that each service provider is planning on serving in comparison to the population projections for the *2045 Whatcom County Comprehensive Plan*.

Table 12.5 Population Comparison: Sewer Plans and 2045 Population Projection

Service Provider	Horizon year of Capital Plan	Capital Plan Population	County's 2045 Population Projection ¹
Bellingham	2036	124,157	131,216
Birch Bay Water and Sewer	2038	13,643	12,294
Blaine	2036 ⁴	10,871	7,688
Everson	2045	4,044	3,240
Ferndale	2036	19,591	18,027
Lynden	2036	19,275	17,657
Nooksack	2045 ⁵	2,568	2,363
Sumas	2,045	³ 2,835	2,452
Lake Whatcom Water and Sewer District	2,039	12,404	9,840²
Water District 13	2029	1,595	1,841
1 Population Estimates from the <i>Whatcom County Population and Employment Allocations by Special District</i> (June 2025) 2 The boundaries of the District are larger than the area served by sewer. Total projected population for LWWSD-North and LWWSD-South as defined in the <i>Whatcom County Population and Employment Allocations by Special District</i> pg. 8. 3 City of Sumas Water System Comprehensive Plan, December 2025 4 City of Blaine Technical memorandum 2016 5 City of Nooksack GSP Amendment April 2026			

Capital Facility Projects

Sewer services and capital facilities are funded primarily by the users of the system through service charges and connection fees. These rates are adjusted as needed to fund capital and operational needs. Some grant programs exist for the construction of sewer facilities and upgrades, but, like many grant programs, they are generally very competitive.

City of Bellingham

The *City of Bellingham Comprehensive Sewer Plan* (2009) and *Wastewater Conveyance Plan* (2016) indicate that the City maintains a wastewater collection and conveyance system comprised of gravity sewers, pump stations, and force mains. The City of Bellingham operates a wastewater treatment plant, which is also utilized by the Lake

Whatcom Water and Sewer District. The *City of Bellingham Comprehensive Sewer Plan* contains a capital improvement program with approximately \$54.2 million in capital projects (2016-2026). These projects include collection system improvements and wastewater treatment plant improvements. The financial plan indicates that system development charges, rates, cash reserves, and revenue bonds are funding sources to implement the plan and that projected funds will be adequate for planned capital projects.

Birch Bay Water and Sewer District

The *Birch Bay Water and Sewer District Comprehensive Sewer Plan* was adopted by the District in 2019 and revised in 2020. Birch Bay Water and Sewer District provides sewer collection and treatment services for the area within and some areas adjacent to the Birch Bay UGA. The system includes a wastewater treatment plant, 11 pump stations and over 65 miles of collection and conveyance piping. The wastewater treatment plant was evaluated in 2012. The system serves development throughout the UGA, including all developed areas along the Birch Bay shoreline and existing urban-density development inland. The sewer service area addressed in the plan update includes all of the Birch Bay UGA, and parcels and plats with existing sewer service. In 2016 aeration system improvements were completed increasing the permitted capacity. The 2020 plan includes a capital improvement plan for adequate capacity and extension or upgrade of collection system facilities to service the designated area.

City of Blaine

The *City of Blaine General Sewer Plan* (2004, revised 2005) and associated Technical Memorandum (2016) indicate that the City of Blaine maintains a wastewater collection and conveyance system comprised of gravity sewers, pump stations, and force mains. The City of Blaine operates a bio-membrane wastewater treatment plant that discharges to Semiahmoo Bay. The plant is called the Lighthouse Point Water Reclamation Facility and uses advanced membrane bio-reactors to purify wastewater to meet Class A water reuse standards, such as irrigation of parks and golf courses. Lighthouse Point replaced the city's former facility which has since been decommissioned. Lighthouse Point generates reclaimed water suitable for industrial and agricultural uses, and the city is currently contracted with Resort Semiahmoo to supply reclaimed water for golf course irrigation, and a private user for service of a landscape water feature.

The plant has a design capacity of 3.1 million gallons per day (mgd) for purification, and has the current capacity to treat an annual average of 1.54 mgd. The City of Blaine General Sewer Plan contains a capital improvement program with approximately \$33.5 million in capital projects over its 20-year planning period. A significant portion of that has already been invested in developing Lighthouse Point and the flow attenuation tanks; a total of \$26.0 million was estimated in the Plan for those two facilities. In the plan's forecast period (2016-2036), the city forecasts line extensions and installation of

pumping facilities to serve new development, as well as phased expansion of the Lighthouse Point facility. However, these are only necessary if development occurs and will be paid primarily through general facility fees. These projects include sewer trunk line extensions, and associated pump stations, into the East Blaine planning area as development in that area generates the need. They also include development of sewer trunk line extensions, and associated pump stations, in the West Blaine planning area as development also creates the need there. The vast majority of these facilities will be developer installed. The city's financing plan projects adequate revenues to cover expenses over the 20-year planning period only if the city continually assesses the rate structure and general facility fees as time progresses. The city has accomplished the greatest goal outlined in the plan (building the new treatment facility) and is well-staged to expand the delivery system as demand increases due to expanding population.

City of Everson

The *2025 General Sewer Plan Amendment* indicates that the City of Everson maintains a wastewater collection and conveyance system comprised of gravity sewers, pump stations, and force mains. The City of Everson operates a wastewater treatment plant, which is also utilized by the City of Nooksack (pp. ES-1 and 1-1). The Everson Wastewater Treatment Plant is being upgraded in 2016 to increase capacity to accommodate projected growth over the 20-year planning period. The 2025 General Sewer Plan Amendment contains a capital improvement program with over \$8 million in capital projects over the next 20 years (2026-2045). These projects include pump station, collection system and wastewater treatment plant improvements (pp. ES-3 through ES-6). The financing plan indicates there are fiscal challenges but also includes strategies for addressing projected funding gaps (pp. ES-7 through ES-9).

City of Ferndale

The *City of Ferndale Comprehensive Sewer Plan* (2016) indicates that the City of Ferndale maintains a wastewater collection and conveyance system comprised of gravity sewers, pump stations, and force mains. The City of Ferndale also operates a wastewater treatment plant (pp. 15). The city plans to increase the capacity of the wastewater treatment plant from 3.23 MGD to 6.37 MGD (p. 16). The existing lagoon system will be converted to an extended aeration activated sludge treatment plant. The *Ferndale Comprehensive Sewer Plan* contains a capital improvement program in the range of \$48,000,000 to \$58,000,000 million in capital projects over the next 20 years (2016-2036). These projects include pump stations, collection system, wastewater treatment plant improvements, and inflow/infiltration reduction projects. The city's financing plan projects adequate revenues to cover expenses over the 20-year planning period (p. 32).

City of Lynden

The *City of Lynden General Sewer Plan* (2007) and the BHC Consultants Technical Memorandum (June 22, 2016) indicate that the City of Lynden maintains a wastewater collection and conveyance system comprised of gravity sewers, pump stations, and force mains. The City of Lynden amended the Sewer Plan in 2020 to include a new pump station with a 175 gpm submersible duplex pump station. The City of Lynden also operates a wastewater treatment plant that include an influent pump station, headworks with screens and grit removal, three anoxic selector tanks, two oxidation ditches, two secondary clarifiers, effluent cloth disc filters, UV disinfection system, effluent Parshall flume, effluent pump station, sludge thickening and digestion, sludge dewatering, and composting facilities. The City of Lynden's updated capital improvement program set forth in the BHC Consultants Technical Memorandum (June 22, 2016) contains collection & conveyance system and wastewater treatment plant capital projects over the next 20 years from 2016-2036. The city's financing plan projects adequate revenues to cover expenses over the 20-year planning period.

City of Nooksack

The *City of Nooksack 2012 General Sewer Plan Elements Amendment* (April 2026) indicates that the City of Nooksack maintains a wastewater collection and conveyance system comprised of gravity sewers, pump stations, and force mains. The City of Nooksack does not operate a wastewater treatment plant. Wastewater from Nooksack is treated at the Everson Wastewater Treatment Plant (pp. 1-1, 3-1, 3-2 and 3-3). The 2025 Everson General Sewer Plan Amendment contains a capital improvement program with over \$8 million in capital projects over the next 20 years (2026-2045). These projects include pump station, collection system and wastewater treatment plant improvements (pp. ES-3 through ES-6). The financing plan indicates there are fiscal challenges but also includes strategies for addressing projected funding gaps (pp. ES-7 through ES-9).

City of Sumas

The City of Sumas does not have a comprehensive sewer plan. The Sumas sewer system was addressed in the 2025 update of the Sumas Comprehensive Plan. The Sumas Comprehensive Plan addresses the 20-year period through 2045 including a 2045 population of 2,810.

The city has an ongoing contract with the City of Abbotsford to receive and treat sewage collected in Sumas. This contract provides for the receipt and treatment of a maximum volume of 400,000 gallons per day through December 31, 2028. Discharges from the Sumas system are metered on a daily basis. The contract, which was extended in 2008, allows for a discharge of 378,000 gpd during calendar year 2015, increasing by 5,500 gpd each year for the coming 4 years, reaching an ultimate ceiling of 400,000 gpd.

Existing average daily usage during the maximum month in 2024 was approximately 370,000 gpd, of which 128,000 gpd is attributable to a single customer – the PSE co-generation plant. Surplus capacity is about 30,000 gpd at present.

In order to accommodate future growth, the Cities of Sumas and Abbotsford must begin discussions of upgrading the system servicing Sumas. In the spring of 2025, those discussions began. The City of Abbotsford will be updating their wastewater master plan in 2028. By that time, the two cities should have a plan to upgrade the Sumas system to accommodate our future growth for the next 20 years. Table 4-1 (p. 44) of the City of Sumas Comprehensive Land Use Plan 2025-2045 shows over 5 million in improvements through the year 2045, including pump upgrades, three new lift stations, and two new sewer systems (South UGA and West UGA). The Capital Facilities Element of the Sumas Comprehensive Plan (2025) includes a capital improvement program through 2045 that identifies over \$5 million in capital projects to be funded through a combination of monthly rates and charges, connection charges, and developer contracts (Table 4-1). The Capital Facilities Element of the Sumas Comprehensive Plan also includes a six-year financial analysis (2024-2029) indicating that the city sewer system will have sufficient revenues to cover anticipated expenditures, including capital improvement costs, through 2029 (p.67).

Lake Whatcom Water and Sewer District

The *Lake Whatcom Water and Sewer District Comprehensive Sewer Plan* (2020) indicates that the District maintains a wastewater collection and conveyance system comprised of gravity sewers, pump stations, and force mains. The district sends wastewater to the City of Bellingham for treatment and disposal. The district and the City of Bellingham have a contract for wastewater treatment and disposal. The *Lake Whatcom Water and Sewer District Comprehensive Sewer Plan* contains a capital improvement program with approximately \$23,662,743 million in capital projects over the next several years (2020-2029). These projects include pump station replacements, sewer line replacements, Sewer System Rehab and Replacement Projects, and COB Post Point WWTP Biosolids Handling (Exhibit K).

Water District 13

Water District 13 provides sewer service to a portion of the Columbia Valley UGA. The *Whatcom County Water District No. 13 Comprehensive Sewer Plan* (2020) indicates that Water District 13 maintains a wastewater system comprised of pressure and gravity sewer pipes, pump stations, a wastewater treatment plant, and a force main that transfers flows from the treatment plant to the drain field. A General Sewer Plan and Engineering Report for the District is currently in development, and will include a capital improvement program for the sewer system comprised of projects including, but not limited to, designing and upgrading the wastewater treatment plant. The total cost and projected timeline for these improvements are to be determined. However, financing

options to fund these capital improvements align with the suggestions of the 2012 *Whatcom County Water District No. 13 Comprehensive Sewer Plan*; the District could issue bonds and utilize general facilities charges, developer extension charges, and monthly service charges to pay for capital facility improvements (*Whatcom County Water District No. 13 Comprehensive Sewer Plan* pp. 7-7, 7-8, 7-14 and Figure 7.2).

Chapter 13 – Schools

Schools

This section evaluates the seven public school districts that serve Whatcom County and provides:

- An inventory of current (2025) facilities, showing the existing enrollment capacity at the elementary, middle school and high school levels;
- A forecast of future needs, indicating whether existing school facilities can accommodate future student enrollment projections; and
- Capital projects and funding, summarizing the facility improvements proposed by the Districts to provide additional classroom space for future students.

Inventory of Current Facilities

Inventories of the school districts' existing facilities located in Whatcom County are presented in this section. Each inventory includes the number of students that the school district can accommodate (enrollment capacity) for the elementary, middle school and high school grades.

Bellingham School District

The Bellingham School District serves the majority of the City of Bellingham and surrounding areas. The school district's current enrollment capacity is shown below.

Table 13.1 Bellingham School District Current Enrollment Capacity

School	Total Enrollment Capacity
Elementary	4,651
Middle School	2,384
High School	3,139
Total K-12	10,174

Source: Bellingham School District (October 2024)

Blaine School District

The Blaine School District serves the City of Blaine and its UGA, most of the Birch Bay UGA, and surrounding rural areas. The school district's current enrollment capacity is shown below.

Table 13.2 Current Enrollment Capacity

School	Total Enrollment Capacity
Elementary	1,251
Middle School	540
High School	800
Total K-12	2,555

Source: Blaine School District Capital Facilities Plan (December 2024).

Green Infrastructure

Green infrastructure in the Blaine School District includes, the Blaine Educational campus in the City of Blaine: Approximately 8.5 acres.

Ferndale School District

The Ferndale School District serves the City of Ferndale and its UGA, and rural areas including the Lummi Reservation and Lummi Island. The school district's current enrollment capacity is shown below.

Table 13.3 Current Enrollment Capacity

School	Total Enrollment Capacity
Elementary	2,300
Middle School	1,300
High School	1,600
Total K-12	5,200

Source: Office of Superintendent of Public Instruction (2025) and Ferndale School District (October 2024)

Lynden School District

The Lynden School District serves the City of Lynden and its UGA, and surrounding agricultural and rural areas. The school district's current enrollment capacity is shown below.

Table 13.4 Current Enrollment Capacity

School	Total Enrollment Capacity
Elementary	1,740
Middle School	840
High School	920
Total K-12	3,500

Source: Office of Superintendent of Public Instruction (2025) and Lynden School District (October 2024)

Green Infrastructure

The Lynden School District Capital Facilities Plan 2024-2031 does not identify any green infrastructure.

Meridian School District

The Meridian School District serves mostly rural areas, although the City of Bellingham extends into the southern portion of the District. The school district's current enrollment capacity is shown below.

Table 13.5 Current Enrollment Capacity

School	2024-2025 Total Enrollment Capacity
Elementary	690
Middle School	416
High School	560
ALE ¹	165
Total K-12	1,777

Source: Meridian School District No. 505 Capital Facilities Plan 2025-231 (September 2025, p. 5).

¹ Alternative Learning Environment

Mount Baker School District

The Mount Baker School District serves the Columbia Valley UGA and rural areas in eastern Whatcom County. The school district's current enrollment capacity is shown below.

Table 13.6 Current Enrollment Capacity

School	Total Enrollment Capacity
Elementary	1,255
Middle School	428
High School	944
Total K-12	2,627

Source: Mount Baker School District Capital Facilities Plan (May 2013, p. 6).

Nooksack Valley School District

The Nooksack Valley School District serves the cities of Everson, Nooksack, Sumas and their associated UGAs, and surrounding agricultural and rural areas. The school district's current enrollment capacity is shown below.

Table 13.7 Current Enrollment Capacity

School	Total Enrollment Capacity
Elementary	1,300
Middle School	580
High School	600
Total K-12	2,480

Source: Nooksack Valley School District (October 2024) and Office of Superintendent of Public Instruction (2025)

Green Infrastructure

The Growth Management Act, RCW 36.70A.030(21) and EPA recommendations for “Green Infrastructure” are intended to recognize how communities are addressing stormwater run-off given its impact on regional water quality. For the NVSD service area, stormwater management affects how each participating community or UGA (Nooksack, Everson and Sumas) will incorporate the impacts of runoff management to their respective Municipal Stormwater Management Programs.

The NVSD has identified the following areas which will affect retention and run-off of storm water:

MIDDLE SCHOOL

Middle School Field: 12.3 Acres including Western Ball Field

ELEMENTARY SCHOOLS

Everson Elementary School

School Field: 5.5 Acres

Nooksack Elementary School

Rear School Field: 9 Acres includes 1.35 Wooded Acres along Breckenridge Creek.

Front Landscaping at North/Entry: 5.5 Acres.

Sumas Elementary School

School Field: 2.7 Acres

Landscaped Area at Drop Off: 1 Acre

Parking Lot Drainage Areas: 0.20 Acres

HIGH SCHOOL

School Field Area: 11 Acres

NOOKSACK VALLEY SCHOOL DISTRICT

Ostrum Conservation Site. 38.6 Acres of dedicated conservation area on South Pass Road. Provides public education

to the community and includes a portion of Breckenridge Creek.

Source: Nooksack Valley School District Capital Facilities Plan, 2025

Future Needs

The forecast of future needs shows whether a school district's existing capacity will be able to accommodate projected student enrollment increases over the 20-year planning period, or whether the Districts will need plans for additional school facilities to meet future needs. Several school districts have developed 20-year student enrollment projections in association with their capital facility plans (CFPs). School district projections are used in the analysis, when available. When 20-year projections are not available from the school district CFPs, school district projections through direct correspondence are utilized.

Future enrollment is affected by demographic trends (such as an aging population) and trends in alternative school methods including home schooling, Running Start program, and online schooling. Therefore, school districts routinely monitor enrollment growth trends and may adjust their plans accordingly. Table 13.8 shows whether existing classroom capacity will be adequate to serve the projected student enrollment in 2025. As can be seen by this analysis, deficits are experienced in six school districts by 2045. School districts can address future deficits by constructing additional classrooms, installing portables, and/or increasing the number of students accommodated in existing classrooms.

Table 13.8 Whatcom County School District – Forecast of Future Needs 2045

School District	Existing Student Capacity	2045 Enrollment Projection ¹	2045 School Surplus (Deficit) Capacity
Bellingham	10,147	12,930	(2,756)
Blaine	2,555	2,050	505
Ferndale	5,200	5,557	(357)
Lynden	3,500	4,003	(503)
Meridian	1,777	2,228	(451)
Mount Baker	2,627	1,200	1,427
Nooksack Valley	2,480	2,100	380

¹ Projections were provided by each school district in October 2024 or updated Capital Facilities Plans if adopted by October 2025.

Capital Projects and Funding

Most school districts in Whatcom County have capital facility plans that inventory existing school facilities, project future enrollment levels, and identify capital projects needed to support student enrollment growth in their respective districts.

Capital Project Funding

School Districts in Washington State fund capital improvements with both State and local dollars. Local capital financing is usually achieved through two primary mechanisms. The first is the property tax, in which residents of the school district vote to finance a capital bond with an increase in property taxes. The annual bond cost is spread over the life of the bond. Therefore, if property values increase over time the levy rate necessarily declines to generate the same annual revenue.

The second potential financing tool is a school impact fee, which is designed to recover costs from new development for the facility improvements necessary to serve development. This fee is usually charged to new residential development based on the number and type of units constructed.

Bellingham School District

The future needs analysis indicates that the Bellingham School District's projected enrollment in 2045 will exceed the current school capacity by 2,756 students. The *Bellingham School District No. 501 Capital Facilities Plan 2021-2026* (June 2021) indicates that permanent capacity will increase by 1,636 over the six-year planning period (Table 3). The projects that will increase permanent capacity are the Sehome High School replacement/addition, Parkview, Alderwood, Sunnyland, Roosevelt, and Columbia Elementaries replacement/additions, and new elementary school on Cougar

Rd. (Table 3). Installing portables and purchasing additional property are also planned in the next six years (Table 3). These projects are anticipated to be funded by bonds, state match, and impact fees.

While the District's CFP is a six-year plan, rather than a 20-year plan, it does state that "The District will closely monitor population growth and incorporate planned projects to meet actual student needs in future updates to this Plan" (p. 3).

Blaine School District

The future needs analysis indicates that the Blaine School District's projected enrollment in 2045 will not exceed the current school capacity. The *Blaine School District Capital Facilities Plan* (Dec. 2024) indicates that several projects are funded including Birch Bay Property Acquisition, track/storage facility, pipeline improvements, gym foyer flooring, middle school paint, and old building demolition. These projects are being funded by a \$45 million bond measure passed by the voters in February 2015. The CFP also indicates that the District plans to build athletic fields and remodel schools, although these projects are not currently funded (p. 12).

Ferndale School District

The future needs analysis indicates that the Ferndale School District's projected enrollment in 2045 will exceed the current school capacity by 357 students. The *Ferndale Schools Capital Facilities Plan and School Impact Fee Ordinance* (April 2013) indicates that the District is looking at replacing two elementary schools and remodel one middle school in the six-year planning period at the cost of about \$180 million. The proposed funding source would primarily be voter approved bonds and state matching funds.

Lynden School District

The future needs analysis indicates that the Lynden School District's projected enrollment in 2045 will exceed the current school capacity by 503 students. The *Lynden School District Capital Facilities Plan* (March 2025) indicates that permanent capacity will increase by 700 more students over the six-year planning period. Projects in the six-year planning period that will add capacity are additions to Lynden Middle School, Isom Elementary, and Bernice Vossbeck Elementary in the amount of \$181 million. These projects are not funded with the District reviewing next steps for funding after a bond declined to pass in 2024.

Meridian School District

The future needs analysis indicates that the Meridian School District's projected enrollment in 2045 cannot be accommodated by the current school facilities. The *Meridian School District No. 505 Capital Facilities Plan 2025-2031* (September, 2025)

and *Meridian School District Strategic Plan* (April 2023) indicate that the District is proposing to replace one middle school in the six-year planning period at the cost of about \$87 million. The proposed funding source would primarily be voter approved bonds and state matching funds.

Mount Baker School District

The future needs analysis indicates that the Mount Baker School District's projected enrollment in 2045 can be accommodated by the current school facilities. The *Mount Baker School District Capital Facilities Plan* (June 2024) indicates that the District has adequate classroom space to serve projected student enrollment through the entire 20-year planning period. While the District does not plan to add classroom space, it does plans to invest in facility improvements, maintenance, and energy upgrades.

Nooksack Valley School District

The future needs analysis indicates that the Nooksack Valley School District's projected enrollment in 2045 can be accommodated by the current school facilities. According to the *Nooksack Valley School District Capital Facilities Plan* (March 2025), projects in the six-year planning period include renovating the Everson, Nooksack, and Sumas elementary schools as well as relocating the Nooksack Valley High School. These projects are being funded by bond measures passed in 2014 and 2019. While the District does not plan to add additional classroom space, a process to renovate or build a new high school could start as current bonds expire in 2039. The district will continue to invest in facility improvements and upgrades as needed.

Chapter 14 – Fire Protection

Fire Protection

The County is served by 15 different fire departments or districts, 13 of which serve unincorporated portions of the County:

▪ City of Bellingham	▪ Fire District 7	▪ Fire District 17
▪ City of Lynden	▪ Fire District 8	▪ Fire District 18
▪ Fire District 1	▪ Fire District 11	▪ Glacier Fire District 19
▪ Fire District 4	▪ Fire District 14	▪ North Whatcom Fire and Rescue
▪ Fire District 5	▪ Fire District 16	▪ South Whatcom Fire Authority

The cities of Bellingham and Lynden have their own fire departments. There are urban growth areas (UGAs) within the boundaries of seven fire districts in the County. These seven districts serve the UGAs along with surrounding rural areas. Fire District 1 serves the cities of Everson and Nooksack. Fire District 7 serves the City of Ferndale and the Cherry Point UGA. Fire District 8 serves portions of the Bellingham UGA. Fire District 14 serves the City of Sumas and the Columbia Valley UGA. North Whatcom Fire and Rescue, also provides service within the boundaries of Fire District 4, serves the City of Blaine, the Birch Bay UGA, the Lynden UGA (outside city limits), and portions of the Bellingham UGA. South Whatcom Fire Authority serves portions of the Bellingham UGA. Six fire districts serve rural areas and do not contain UGAs within their boundaries. These are Fire Districts 5, 11, 16, 17, 18 and 19.

Each city and fire protection district is assigned a numeric fire protection rating (a Class 1 rating is considered best) by the Washington Surveying and Rating Bureau. Insurance companies fund the Bureau to perform on-site inspections of fire districts to determine the rating. The Bureau analyzes five areas: average response time, water supply, communication network, schedule of fire inspections, and existing conditions of fire stations. Fire station evaluations focus on the age of vehicles, amount of personnel training, and whether the facilities are staffed or not. Insurance companies use the fire protection rating to help determine insurance rates on all fire insurance policies. Quality of fire service can have a significant impact on fire insurance rates with the greatest impact experienced by commercial occupancies.

In addition to fire protection services, the agencies listed here provide responses to medical emergencies. In fact, EMS calls account for the majority of the responses by most fire protection agencies.

The City of Bellingham and Whatcom County operate the 911 emergency telephone system, called What-Comm. The initial call receiving site is located in Bellingham, and is

responsible for dispatching most law enforcement agencies in Whatcom County. All fire and medical related calls are forwarded to the Fire Dispatch Center located at Bellingham Fire Department's Broadway Street Station. The Fire Dispatch Center is responsible for dispatching all municipal fire departments and fire districts in Whatcom County. The Bellingham Police Department operates the What-Comm Center and the Bellingham Fire Department operates the Fire Dispatch Center.

Inventory of Current Facilities

Table 14.1 summarizes the capital facilities for each fire district. It also includes each district's fire rating, service population and whether the District serves an urban growth area (UGA).

Table 14.1 Fire Facilities Inventory

Fire Protection Provider	Number of Stations	Protection Classification ¹	Service Area Population (2023)	Serves UGA (Y/N)
City of Bellingham	8	3	96,684	Y
City of Lynden	1	5	13,097	Y
Fire District 1	2	7/8	8,272	Y
Fire District 4	2	5	7,735	Y
Fire District 5	2	4	4,792	N
Fire District 7	6	4/5 ²	20,553	Y
Fire District 8	2	5	7,756	Y
Fire District 11	1	7	1,729	N
Fire District 14	3	5/6 ³	9,561	Y
Fire District 16	3	8	1,022	N
Fire District 17	2	5	2,091	N
Fire District 18	2	6	2,568	N
Fire District 19	1	7	1,832	N
North Whatcom Fire & Rescue and Fire District 4	8	5	26,705	Y
South Whatcom Fire Authority	4	5	13,124	Y

1 Fire rating is based upon the Washington Surveying and Rating Bureau (WSRB).

2 Fire rating for Cherry Point is 5 and fire rating for Ferndale is 4.

3 The WSRB ratings vary within Fire District 14 from 5 (in Sumas) to 6 (in outlying areas), depending on location and type of structure.

Future Needs

Whatcom County adopted a level of service (LOS) standard tied to response time and fire ratings in the Comprehensive Plan in 2016. The Whatcom County Comprehensive Plan contains the following LOS standards:

Urban levels of service for fire protection shall be a response time of 8 minutes 80% of the time when the department covering the urban area has staffed the fire station. When the fire station is not staffed the response time shall be 10 minutes 80% of the time, or a WSRB Rating of a 6.

Rural levels of service for fire protection shall be a response time of 12 minutes 80% of the time when the department covering the rural area has staffed the fire station. When the fire station is not staffed the response time shall be 14 minutes 80% of the time, or a WSRB Rating of an 8.

Staffed stations shall be a fire station that is staffed 24 hours a day 7 days a week 365 days a year. Staff may be paid, volunteer, or combination of the two.

Each fire district is tasked with planning for facility and service upgrades needed to maintain acceptable LOS over the planning period. Most fire districts currently meet the LOS standards. Table 14.2 provides a brief description of currently planned capital facility improvements and the anticipated effects of growth. In general, facility improvements and upgrades are implemented over time as demand for service increases.

Table 14.2 LOS Analysis – Fire Departments and Fire Districts Serving UGAs¹

Fire District	Currently Proposed Capital Facilities	Explanation
Bellingham Fire Department	Facility maintenance and upgrades; replacement of equipment and vehicles; construction of a new fire station.	The LOS is anticipated to be met with the implementation of the currently proposed capital facility projects. Although this fire service area would see the highest population growth, no significant deficiencies in service are anticipated with the planned projects.
Lynden Fire Department	Facility and equipment maintenance and upgrades	The City of Lynden recently completed a renovation of the fire station. Other improvements and equipment purchases would be made as demand arises. The addition of households under any of the alternatives is not anticipated to reduce the LOS.

Fire District	Currently Proposed Capital Facilities	Explanation
Fire District 1	Property purchased for future station.	The LOS is anticipated to be met with the construction of the new fire station, which is anticipated to service future growth under the preferred alternative.
Fire District 4	Levy passed in 2023 to maintain service contract with NWFR; replacement of fire engine.	The LOS is anticipated to be met with the continued service contract with NWFR and replacement of equipment as needed.
Fire District 5	Facility maintenance and upgrades; replacement of various fire units and other equipment at end of useful life.	The LOS is anticipated to be met with the implementation of the currently proposed capital facility projects. The Fire District 5 Capital Facilities Plan states that these projects may be modified if growth does not occur as anticipated, conditions change, or as otherwise determined to be required.
Fire District 7	Facility maintenance and upgrades; replacement of various fire units and other equipment at end of useful life.	The LOS is anticipated to be met with the implementation of the currently proposed capital facility projects.
Fire District 8	There are no capital projects identified.	New facilities and staff would likely be added over time as the demand for services increases with population and housing growth over time. No impacts to LOS are anticipated.
Fire District 11	There are no capital projects identified.	Fire District 11 owns a five-acre parcel currently used as training grounds, which could be used for future facilities if a need is identified. With the minimal amount of population and housing growth anticipated in this District, no impacts to LOS are anticipated.

Fire District	Currently Proposed Capital Facilities	Explanation
Fire District 14	Kendall station maintenance and upgrades; Sumas station replacement.	The LOS is anticipated to be met with the implementation of the currently proposed capital facility projects. The property for a new Sumas station was purchased in 2011.
Fire District 16	There are no capital projects identified.	New facilities and staff would likely be added over time as the demand for services increases with population and housing growth over time. With the minimal amount of growth anticipated in this District, no impacts to LOS are anticipated.
Fire District 17	None; fire station was destroyed by coastal flooding in 2022, causing over \$750,000 in damages.	Fire District 17 is proposing a levy to build a new station outside of the floodplain. With the new fire station, the District would likely meet the LOS under the Preferred Alternative. The amount of population and housing growth projected for District 17 is minimal. However, if the station is not replaced within the 20-year planning period, the current facilities would likely not meet the needs of the community.
Fire District 18	There are no capital projects identified.	New facilities and staff would likely be added over time as the demand for services increases with population and housing growth over time. With the minimal amount of growth anticipated in this District, no impacts to LOS are anticipated.
Fire District 19	There are no capital projects identified.	New facilities and staff would likely be added over time as the demand for services increases with population and housing growth over time. With the minimal amount of growth anticipated in this District, no impacts to LOS are anticipated.
North Whatcom	Facility maintenance and upgrades; vehicle purchases.	The LOS is anticipated to be met with the implementation of the currently proposed capital facility projects.

Fire District	Currently Proposed Capital Facilities	Explanation
Fire and Rescue		
South Whatcom Fire Authority	Replacement of fire engines; station upgrades.	The LOS is anticipated to be met with the implementation of the currently proposed capital facility projects, with the exception that there is currently not sufficient information to determine if South Whatcom Fire Authority will meet the LOS standards set forth in the Whatcom County Comprehensive Plan for the Yew St. and Geneva UGAs.

1 Final EIS Whatcom County 2025 Comprehensive Plan and Development Regulations Update.

Table 14.3 LOS Analysis – Fire Districts Serving Rural Areas

Fire District	WSRB Rating Standard	Response Time Standard	Meets Adopted LOS?
Fire District 5	5	14 minutes 80% of the time	Yes ¹
Fire District 11	8	14 minutes 80% of the time	Yes ¹
Fire District 16	8	14 minutes 80% of the time	Yes ¹
Fire District 17	8	14 minutes 80% of the time	Yes ¹
Fire District 18	8	14 minutes 80% of the time	Yes ¹
Glacier Fire District 19	8	14 minutes 80% of the time	Yes ¹

1 Final EIS Whatcom County 2025 Comprehensive Plan and Development Regulations Update

Capital Projects and Funding

Capital Project Funding

Fire Districts usually fund needed capital improvements through a combination of revenue sources. These can include property tax levies, cash reserves, capital bond proceeds, mitigation fees, fire impact fees and other sources.

The State of Washington authorizes fire districts to levy both “regular” and “special” property taxes to support their operational and capital needs. As part of the regular property tax levy, a fire service provider is authorized to levy a property tax at a total maximum rate of \$1.50 per \$1,000 of assessed value. However, the total maximum aggregate “regular” property tax levy by local taxing agencies in an area may not exceed \$5.90. Occasionally, all local levies will total more than this limit. In this case, “junior”

taxing districts, including fire districts, must follow state statute to lower their levy rate so that the total aggregate rate does not exceed the statutory limit. Fire districts may also pass “special” property tax levies for short-term periods without a statutory maximum levy limit. Fire impact fees may be collected on new residential and commercial development to fund facility improvements, provided that the County and/or city governments adopt ordinances authorizing such impact fees.

Capital Projects

A summary of the capital projects for the fire departments and districts serving UGAs follow.

City of Bellingham Fire Department

The City of Bellingham Fire Department serves area within the city limits and will serve the UGA upon annexation. Currently, the Bellingham Fire Department assists in providing service to the City's UGA through mutual aid response agreements with Fire Districts. The *Bellingham Comprehensive Plan Capital Facilities and Utilities Chapter* (2016) contains \$495,997 in Fire Department capital improvement projects over the six-year planning period (2017-2022). These projects include replacing medic units and equipment. These costs will be paid from the Medic One fund. There are also a number of unfunded projects including the fire boathouse, Fire Station 1 remodel, fire training center, new fire station, and replacing fire engines, a ladder truck, medic units and support vehicles.

City of Lynden Fire Department

The City of Lynden Fire Department serves area within the city limits and will serve the UGA. Currently, the City of Lynden Fire Department assists in providing service to the City's UGA through mutual aid and automatic aid agreements with North Whatcom Fire and Rescue. The *City of Lynden Fire Department Capital Facilities Plan* (2016) contains over \$7.4 million in capital improvement projects over the 20-year planning period. These projects include a new fire station/training facility, replacing a ladder truck, adding a third ambulance and a variety of apparatus and vehicle replacement purchases. Capital facility funding sources include property tax, sales tax, ambulance utility fees, transport fees, and impact fees.

Fire District # 1

Fire District # 1 serves the Everson UGA, Nooksack UGA and surrounding areas. Fire District #1 is actively collaborating with the City of Everson to pursue funding opportunities for the construction of a new fire station, to be located at 7248 Everson Goshen Road. In addition, the District has submitted a Building Resilient Infrastructure and Communities (BRIC) grant through FEMA to support this project. The new site at

7248 Everson Goshen Road is situated outside of the floodplain, offering a significant improvement over the current station's location.

The Capital Facilities Plan Whatcom County Fire District #1 (2026-2046) contains modernization of Station 82 for long-term safety and staffing, restoration of LOS standards through Station 81 relocation, and improvements to communication, apparatus, equipment and water supply capability. The relocation of Station 82 remains the District's most critical capital priority, the project is scheduled within the seven-to-twenty-year planning horizon due to current funding limitations. The Fire District is currently funded through levies, contracts for services, grants, and limited fees and reimbursements.

Fire District # 7

Fire District # 7 serves the Ferndale UGA, Cherry Point UGA and surrounding areas. The *Whatcom County Fire District No. 7 Capital Facility Plan* (September, 2025) contains approximately \$ 40.7 million in capital improvement projects over the 20-year planning period (pp. 22-24). These projects include station improvements, a Department Training Center, and a variety of apparatus and vehicle purchases. Capital facility funding sources include property tax revenues, bonds, grants, reserves and potentially mitigation fees (pp. 24-25).

Fire District # 8

Fire District # 8 serves a portion of the Bellingham UGA and surrounding areas. The *Whatcom County Fire District # 8 Capital Facilities Plan* (March 2026) contains approximately \$15.5 million in capital improvement projects over the 20-year planning period (p. 10). These projects include Station 31 apparatus bay replacement (Marine Dr.), Station 34 replacement (McKenzie Rd.), and a variety of apparatus and vehicle purchases. Capital facility funding sources include District revenues such as property taxes, bonds, property sales, mitigation fees, funds from the Lummi Nation, and grants (pp. 10-11).

Fire District # 14

Fire District # 14 serves the Sumas UGA, Columbia Valley UGA and surrounding areas. The *Whatcom County Fire District # 14 Capital Facilities Plan* (June 2026) contains approximately \$25 million in capital improvement projects over the 20-year planning period (pp. 14). These projects include station expansion, remodel, and replacement (Sumas), and a variety of apparatus and vehicle purchases. Capital facility funding sources include annual revenues such as property taxes, reserves, mitigation fees and grants (pp. 14-17).

North Whatcom Fire & Rescue / Fire District 4

In 2011, North Whatcom Fire and Rescue (also known as Fire District 21) completed a functional consolidation with Whatcom County Fire District 4 whereby NWFR provides management and all operation services through a contract with District 4. Together the service area covers one hundred eighty-two square miles. NWFR provides fire protection and emergency medical services for the City of Blaine and associated Urban Growth Area (UGA), the Birch Bay UGA, the Lynden UGA (outside city limits), a portion of the Bellingham UGA, rural areas and agricultural areas within the Districts' boundaries.

The financing aspect of this Capital Facilities Plan relies on existing property tax revenue, bond measures, capital reserves and other sources of revenue to pay for facilities and equipment improvements. The Fire District Commissioners will continue to review capital facilities needs on an annual basis and budget adequate funds for these purposes.

South Whatcom Fire Authority

The South Whatcom Fire Authority was formed in 2009 after voters approved a consolidation of four smaller fire districts. South Whatcom Fire Authority serves portions of the Bellingham UGA and surrounding areas. The district has five existing. A capital facilities plan is not currently adopted.

Chapter 15 – Solid Waste

Solid Waste (County)

State law requires each county within the state, in cooperation with the various cities located within the County, to prepare a coordinated, comprehensive solid waste management plan. The purpose is to plan for solid waste reduction, collection, handling, management, and programs designed to meet the needs of the County and cities (RCW 70.95.080).

Whatcom County Health and Community Services is the lead planning agency for solid waste management in the County. Health and Community Services' Solid Waste Division is responsible for several program areas encompassing waste prevention, economically efficient recycling and disposal systems, litter control, hazardous waste education and disposal opportunities, monitoring the County's closed landfills, comprehensive planning, and providing support for the Whatcom County Solid Waste Advisory Committee.

The County prepared a 2025 *Whatcom County Comprehensive Solid and Hazardous Waste Management Plan* (May 2025) which serves as the basis for the solid waste component of the Capital Facilities Plan.

Inventory of Current Facilities

The waste management system in the County consists of approximately 35 permitted and exempt solid waste handling facilities. These facilities consist of private sector landfills, landfills managed in post closure, transfer stations, drop box collection sites, moderate risk waste (MRW) fixed facilities, composting facilities, anaerobic digesters, biosolids facilities, and recycling operations. The solid waste system is largely privatized, and except for the MRW facility, the County neither owns nor operates collection, treatment, or disposal facilities. The easternmost portion of the County is within the Washington Utilities and Transportation Commission (WUTC) permit collection area of Waste Management and is managed in the Skagit County system. The two primary transfer stations are located within the City of Ferndale. Municipal solid waste transported to these transfer stations, by either self-haulers or local certificated haulers, is transported to landfills located outside of Whatcom County. Recycling facilities are important to the system in Whatcom County, particularly, Lautenbach Recycle Park, which is presently one of the largest facilities offering residential and commercial recycling. Table 15.1 lists solid waste facilities in the County that are part of the solid waste permit system.

Table 15.1 Existing Solid Waste Facilities with Permits

Facility	Operator	Location
Primary Transfer Stations		
RDS Transfer Station	Recycling & Disposal Services, Inc.	4916 LaBounty Pl, Ferndale, WA 98248
Republic Transfer Station	Republic Services	1524 Slater Rd, Ferndale, WA 98248
Drop Box Collection Stations		
SSC Birch Bay-Lynden Drop Box Facility	Sanitary Service	4297 Birch Bay Lynden Rd, Blaine, WA 98230
SSC Cedarville Drop Box Facility	Sanitary Service	Cedarville Rd, Bellingham, WA 98226
SSC Roeder Ave Drop Box Facility	Sanitary Service	1001 Roeder Ave, Bellingham, WA 98225
Nooksack Valley Disposal Drop Box Facility	Nooksack Valley Disposal, Inc.	250 Birch Bay-Lynden Rd, Lynden, WA 98264
Cando Recycling Transfer Station	Freedom 2000, LLC	2005 Johnson Rd, Point Roberts, WA 98281
Tri-County Deadstock Inc.	Tri-County Deadstock Inc.	1405 Birch Bay Lynden Road, Ferndale, WA 98248
Material Recovery Facilities		
Bakerview		
Lautenbach Recycle Park	Lautenbach Recycling	2281 & 2891 E Bakerview Road, Bellingham, WA 98225
Moderate-Risk Waste (MRW) Facility, Public Use		
Disposal of Toxics Facility	Whatcom County Health & Community Services	3505 Airport Dr, Bellingham, WA 98226
Moderate-Risk Waste (MRW) Facility, Private Use		
Seattle City Light MRW Facility	Seattle City Light	500 Newhalem St, Rockport, WA 98283
Vactor Waste Transfer Station		
Hannegan Valley Industrial Park	Cowden Inc	3880 Hannegan Road, Bellingham, WA 98226
City of Ferndale Decant Transfer Facility	City of Ferndale	5443 Ferndale Rd, Ferndale, WA 98248
Composting Facility (permitted)		

Cascade Compost	Alsand Enterprises	774 Meadowlark Ln, Lynden, WA 98264
Anaerobic Digester (permitted)		
Edaleen Cow Power, LLC	Edaleen Cow Power, LLC	9593 Guide Meridian, Lynden, WA 98264
FPE Renewables, LLC	FPE Renewables, LLC	690 Visser Road, Lynden, WA 98246
Biosolids Land Application Facilities		
Tjoelker Enterprises Biosolids Facility	Tjoelker Enterprises	1530 Burk Rd, Blaine, WA 98230
Shannon Tjoelker Biosolids Facility	Tjoelker Enterprises	1687 Burk Rd, Blaine, WA 98230
Lil John Biosolids Facility		9497 Hill Rd, Sumas, WA 98295
City of Ferndale Biosolids Facility	City of Ferndale	5405 Ferndale Rd, Ferndale, WA 98248

Source: EIS Whatcom County 2016 Comprehensive Plan and Development Regulations Update and Urban Growth Areas Review (March 2015, pp. 4-255 and 4-256)

Future Needs

The forecast of municipal solid waste (MSW) generation is in the *2025 Whatcom County Comprehensive Solid and Hazardous Waste Management Plan*.

Table 15.2 shows projected total MSW generated, the amount of this waste anticipated to be disposed, and the amount anticipated to be recycled.

Table 15.2 Solid Waste Generation Forecast

Year	Total MSW Generated (tons)	Total MSW Disposed (tons)	Total MSW Recycled (tons)
2017	417,338	289,230	128,158
2045	535,000	265,000	271,000

Source: *2025 Whatcom County Comprehensive Solid and Hazardous Waste Management Plan*

The County uses waste generation forecasting as a vital element of solid waste management planning. The County uses this data to help address waste prevention, recycling, and special waste issues. The County updates its waste generation models periodically and uses them in conjunction with program and facility planning and evaluation.

Capital Projects and Funding

Currently, the only County capital facility is the Whatcom County Moderate-Risk Waste Facility on Airport Dr. Whatcom County Solid Waste Division has no capital projects for County facilities. However, the *2025 Whatcom County Comprehensive Solid and Hazardous Waste Management Plan* indicates solid waste service providers are aware of the 2045 waste projections and have assured they will continue to plan for and construct sufficient system capacity in advance of need. The County will continue to work with the private solid waste service providers to ensure that facility capacity is constructed in advance of need.

Chapter 16 – County Revenue Projections

Whatcom County Capital Facilities Revenue Analysis

This section discusses Whatcom County's Capital Facilities Revenue for County-provided facilities and services. It assumes the County continues to be responsible for Birch Bay and Columbia Valley.

Introduction

The purpose of this financial analysis is to support the financing plan for the Capital Facilities Plan (CFP) that is required by RCW 36.70A.070(3). These revenue estimates have been developed to assist in project prioritization and planning, and represent realistic, but not exact, estimates of revenue available for the CFP.¹ Variables that are beyond the control of Whatcom County affect the ability to forecast revenues, including but not limited to national economic recession (2008-2010), global pandemic (2020-2022), or trade tariffs and political differences (2025). These events depress economic activity, reduce employment, and decrease visitation and spending by visitors from Canada.

Estimated future revenues have been projected for the Plan's 2026-2045 period, in year of expenditure dollars². These revenues have been grouped according to the following categories:

- Undedicated Transportation Revenues – are composed of Road Fund revenues from the following sources: county road property tax levy, motor vehicle fuel tax allocations, and other undedicated transportation revenues including state timber sales, County Arterial Preservation Grant, Federal Forest Title I entitlement payments, forest excise tax, and minor miscellaneous sources.
- Dedicated Capital Transportation Revenues – these revenues are required by law to be used for specific types of capital expenditures. These revenue sources include state and federal transportation grants for capital improvements.
- Other Capital Revenues – these revenues must be used for capital, but they are not transportation specific. They include Real Estate Excise Tax (REET), Rural Counties Public Facilities Tax, Conservation Futures, Parks State Grants, Stormwater State and Federal Grants.

¹ The revenue estimates are not intended to be precise forecasts. Exact funding levels are difficult to predict given the uncertainties of funding sources. The estimates discussed in this section are to be used for planning purposes; actual revenues are highly sensitive to local, state, and federal policy decisions; personal choices of residents; economic cycles and other market forces.

² Year of expenditure dollars have been inflated to the year in which they are expected to be received.

- Potential Policy Options – these policy options may make additional capital revenues available to the County via policy changes.

Some of the funds discussed in this analysis may be used to fund the maintenance and operations of existing capital facilities or to construct new ones. However, if maintenance and operations costs of existing facilities increase faster than the revenues that support them, jurisdictions are confronted with difficult decisions regarding whether to fund these costs, at the expense of building new capital projects, or to adjust Level of Service (LOS) standards. Those decisions will be made by the County Council and executive leadership of the County according to the County's needs and opportunities.

Assumptions

The revenue projections included in this analysis are based on three major assumptions, as follows:

1. The Birch Bay, Cherry Point and Columbia Valley unincorporated UGAs will continue to be Whatcom County's responsibility for the duration of the 20-year plan.
2. Some current UGAs associated with cities in Whatcom County will be annexed by their respective cities within the 20-year planning period.
3. Some current UGAs associated with cities may lose UGA status and revert to County responsibility. Examples include portions of the Bellingham UGA.

To the extent that a city's UGA represents land that is needed to accommodate the next 20 years of projected growth, and that actual patterns of growth are in line with the patterns envisioned in the Comprehensive Plan, one would expect that most or all of these areas will be annexed during the study period. The schedule at which annexations will occur is unknown; therefore, for purposes of this study they are assumed to occur in equal increments each year. Assuming complete annexation also gives this analysis the most conservative estimate of future revenues.

Undedicated Transportation Revenues

Undedicated transportation revenues are unrestricted County Road Fund revenues. These revenues are used to fund administration, engineering, road maintenance & operations, ferry operations and construction. About 20% of unrestricted road revenues are available for construction activities. A discussion of the major sources of these revenues follows:

County Road Property Tax Levy

This property tax is collected by Whatcom County specifically for transportation funding and accounts for a large portion of the County's transportation funds. Since the passage of Initiative 747 in 2001, property tax increases are restricted to 1.0% of the previous

year's revenues plus new construction. In inflation-adjusted terms, revenues from property tax have been declining, since the 1.0% allowed increase does not keep pace with inflation, which has averaged 2.53% year over year for the period 1999-2015 but has increased from 2015–2025 and has fluctuated significantly from 2020-2025.

If a jurisdiction does not adjust the Property Tax levy rate annually to collect the full 1.0% allowed increase in revenues, the difference between the collected value and the legally-allowed 1.0% increase becomes “banked capacity” which may be collected in future years. For many years, Whatcom County has not increased property taxes and has accrued banked capacity, but recently the County opted to use the banked capacity available.

On November 19, 2024, the Whatcom County Council adopted the 2025-2026 biennial budget with a total tax bill increase of approximately 2.7% for property owners in the unincorporated county and approximately 1% for properties within cities. The adopted Whatcom County budget included banked capacity plus the state-allowed annual 1% annual increase. This equates to a tax increase of 6.4 cents per \$1,000 in assessed value for the general fund and 13.1 cents per \$1,000 for the road fund. (Only property owners in the unincorporated county pay into the road fund.) For a homeowner with a property assessed at \$650,000, this means that an additional \$134 per year will have to be paid to the county, around a 2.7% overall increase in Whatcom County taxes. For property within a city, the owner will have to pay \$45 more per year to the county. (Source: “Whatcom County Council votes 4-3 to adopted budget with an overall 2.7% increase in taxes”; Julia Tellman, Cascadia Daily News, November 20, 2024)

For this portion of the analysis we have assumed that the County will *not* increase the levy rate to collect this banked capacity, nor will they collect the allowed 1.0% increase, but will continue to collect funds at a level equal to the previous year's revenues, plus new construction. By not taking the maximum allowed annual revenue increase, the County's banked capacity will increase each year and, similar to recent events, a future County Council can decide if they wish to collect banked capacity.

State Motor Vehicle Fuel Tax

Counties and cities receive a portion of the State Motor Vehicle Fuel Tax (MVF) based on a complex reimbursement formula that includes population, road maintenance and reconstruction costs, and annual needs. The State of Washington increased fuel taxes each year during the period of 2005-2008 but most fuel tax revenues went to state projects while funding to the County has only increased marginally. The Legislature increased gas taxes again in 2015 and 2025, with but these increases are also not expected to significantly impact County revenues. As the societal vehicle fleet transitions from fossil fuel to other energy sources (Electric, hydrogen, etc.), gas taxes are expected to decline as a percent of total revenue and Washington will need to develop and

implement a new method to charge users to help fund basic maintenance and operations of the statewide transportation system. County MVFT is forecast using the current (2024) annual average.

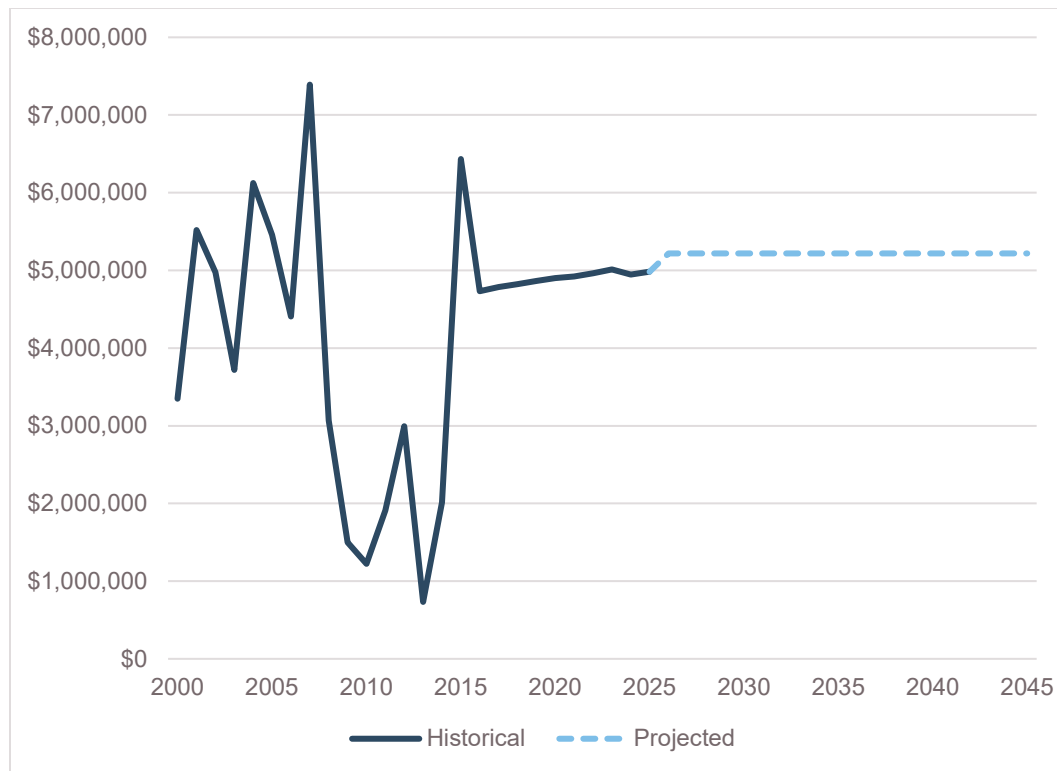
Other Undedicated Transportation Revenues

The County Arterial Trust Account (CAPA) was created by Washington State Legislature in 1990 to fund the preservation of paved arterials on the statewide county road system. The CRA Board administers these funds through the [County Arterial Preservation Program \(CAPP\)](#) program via [WAC 136-300](#). This program makes available grants for the preservation of county arterial roads and supports the four Washington counties operating car ferries: Pierce, Skagit, Wahkiakum, and Whatcom.

The State Legislature increased the CAPP funding to Whatcom County to \$515,000 in 2012 and \$577,822 in 2015, but CAPP funds to Whatcom County decreased to \$543,709 in 2022. For the purposes of this analysis, CAPP funding to Whatcom County is forecast using the current (2024) annual average.

- Federal Forest – Title I revenue has been decreasing in recent years and is expected to be phased out by the federal government within a few years.
- Forest excise tax (previously known as private harvest tax) and state timber sale revenues fluctuate based on market conditions.
- Other undedicated sources include delinquent property taxes, leasehold excise tax, and minor miscellaneous amounts.

For purposes of this study, forest excise tax, timber sales and other undedicated sources have been combined and projected based on the average of the amounts received in the last six years from these sources.

Figure 16.1. Whatcom County Undedicated Transportation Revenues 2000-2045

2015-2025 data represents available actual undedicated transportation revenues or historical estimates used for construction and 2026-2045 projected amounts of undedicated revenues available for construction activities. This study assumes Public Works will utilize 20% of its undedicated transportation revenues for capital projects. Federal and state grants were heavily utilized in the period of 2008-2014; therefore, less local funding was consumed but less grant funding was obtained from 2015-2024, which resulted in heavy reliance on the County Road Fund. County Public Works has indicated that this grant funding scenario and heavier reliance on the County Road Fund is likely to continue.

Table 16.1 shows anticipated total Undedicated Transportation Revenues available for capital transportation construction the next six years and the remaining 14 years of the planning period, including:

- Property Taxes
- State Motor Vehicle Fuel Tax and
- Other Undedicated Transportation Revenue

Table 16.1. Projected Future Whatcom County Undedicated Transportation Revenues 2026-2045

Undedicated Transp.	2026	2027	2028	2029	2030	2031	Total 2026-2031	Total 2026-2045
Estimated Future Revenues	\$5,218,500	\$5,218,500	\$5,218,500	\$5,218,500	\$5,218,500	\$5,218,500	\$31,311,000	\$104,370,000

Dedicated Capital Transportation Revenues

Motor Vehicle Fuel Tax – Paths & Trails Revenues

Beginning in 1997, one percent of the Motor Vehicle Fuel Tax is required by state law to go toward establishing and maintaining paths and trails for pedestrians, equestrians, and bicyclists. As the societal vehicle fleet transitions from fossil fuel to other energy sources (Electric, hydrogen, etc.), gas taxes are expected to decline as a percent of total revenue and Washington will need to develop and implement a new method to charge users to help fund basic maintenance and operations of the statewide transportation system. The future of this funding source is uncertain and MVFT available for Whatcom County paths and trails is forecast using the current (2024) annual average.

Figure 16.2 shows 1.0% of the historical MVF Tax revenue with a solid line, and projected revenues available for paths and trails capital with a dotted line.

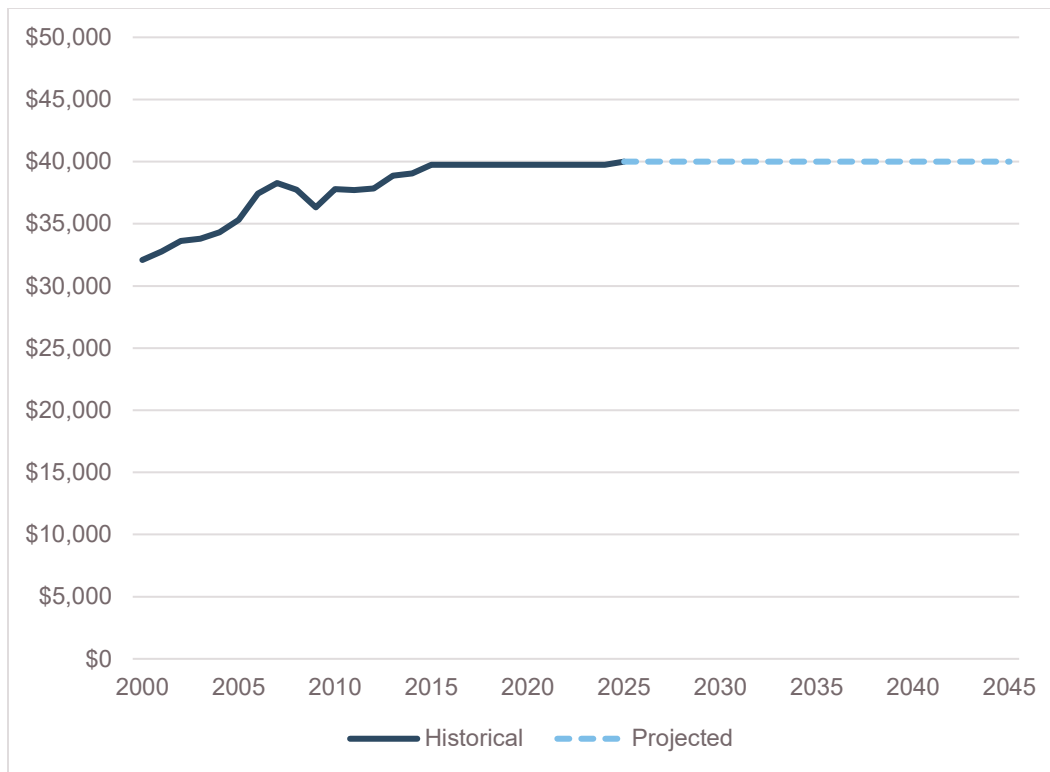
Figure 16.2. Whatcom County MVF Tax Revenue 2000-2045 (Allocated for Capital Projects)

Table 16.2 shows anticipated total Motor Vehicle Fuel Tax revenues available for path and trail capital projects for the next six years and the remaining 14 years of the planning period.

Table 16.2. Projected Future Whatcom County Motor Vehicle Fuel Tax – Paths & Trails Revenues 2026-2045

State Fuel Tax - P&T	2026	2027	2028	2029	2030	2031	Total 2026-2031	Total 2026-2045
Estimated Future Revenues	\$ 40,000	\$ 40,000	\$ 40,000	\$ 40,000	\$ 40,000	\$ 40,000	\$ 240,000	\$ 800,000

Grants

State Transportation Grants

Grants are an important funding source for transportation capital projects; however, these funds are distributed in a competitive process making it difficult to project future grant funding levels. State grants are primarily funded with the state-levied portion of the MVF Tax.

There have, in recent years, been increases in the State MVF Tax rate. However, many of these additional funds were earmarked for specific large projects, although there was some allocation to local jurisdictions. State transportation grant dollars are expected to vary greatly from year to year since they are awarded on a competitive and project-specific basis. For this analysis, recent historical grant revenue trends are considered, and the direction of County Public Works is to assume the current (2024) annual average for 2026-2045.

Figure 16.3 shows historical state grant revenues with the solid line, and projected revenues with a dotted line.

Figure 16.3. Whatcom County State Transportation Grant Revenues 2000-2045 (Allocated for Capital Projects)

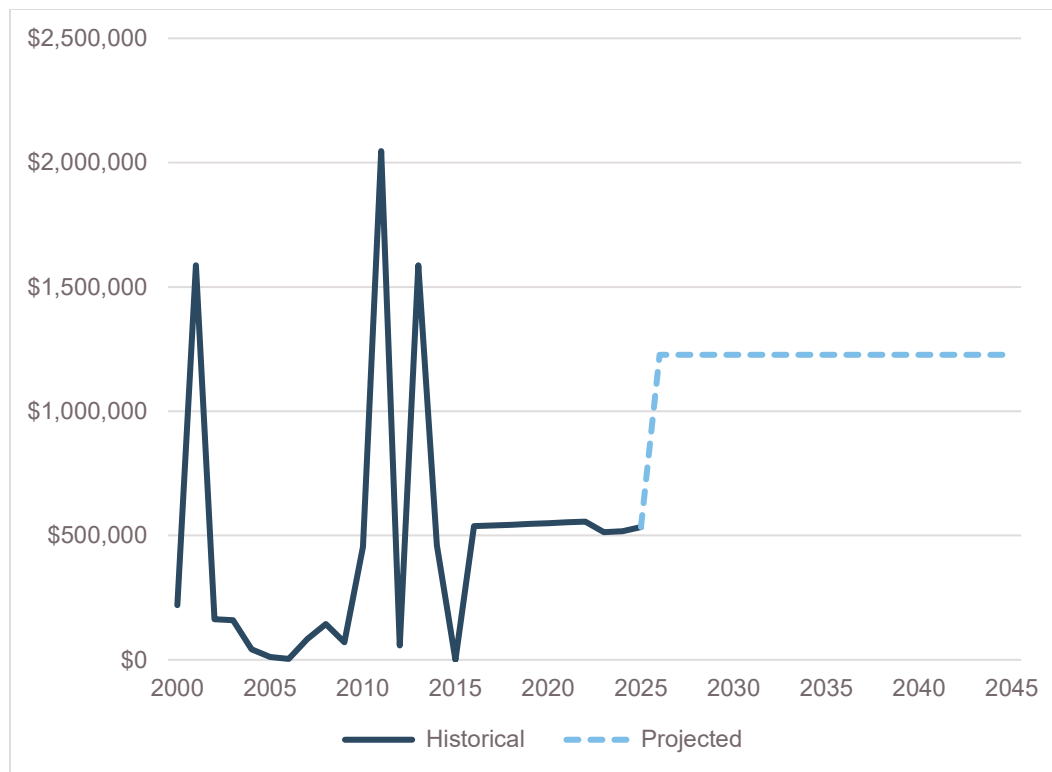


Table 16.3 shows estimated total state grant revenues for the next six years and the remaining 14 years of the planning period.

Table 16.3. Projected Future Whatcom County State Transportation Grant Revenues 2026-2045 (Allocated for Capital Projects)

State Grants Transpo.	2026	2027	2028	2029	2030	2031	Total 2026-2031	Total 2026-2045
Estimated Future Revenues	\$1,227,000	\$1,227,000	\$1,227,000	\$1,227,000	\$1,227,000	\$1,227,000	\$7,362,000	\$24,540,000

Federal Transportation Grants

Federal transportation grants are funded through the federal portion of the fuel excise tax. The federal gas tax rate has fluctuated between \$0.183 and \$0.184 per gallon since 1993. Most of these funds are deposited into the Highway Trust Fund and disbursed to the states through the Highway and Mass Transit Accounts. As with state grants, these funds are distributed in a competitive process making it difficult to determine future grant funding levels. Federal transportation grant dollars are expected to vary greatly from year to year since they are awarded on a competitive and project-specific basis. For this analysis, recent historical grant revenue trends are considered, and the direction of County Public Works is to assume the current (2024) annual average for 2026-2045.

Figure 16.4 shows historical federal grant revenues with a solid line, and projected revenues with a dotted line.

Figure 16.4. Whatcom County Federal Transportation Grant Revenues 2000-2045(Allocated for Capital Projects)

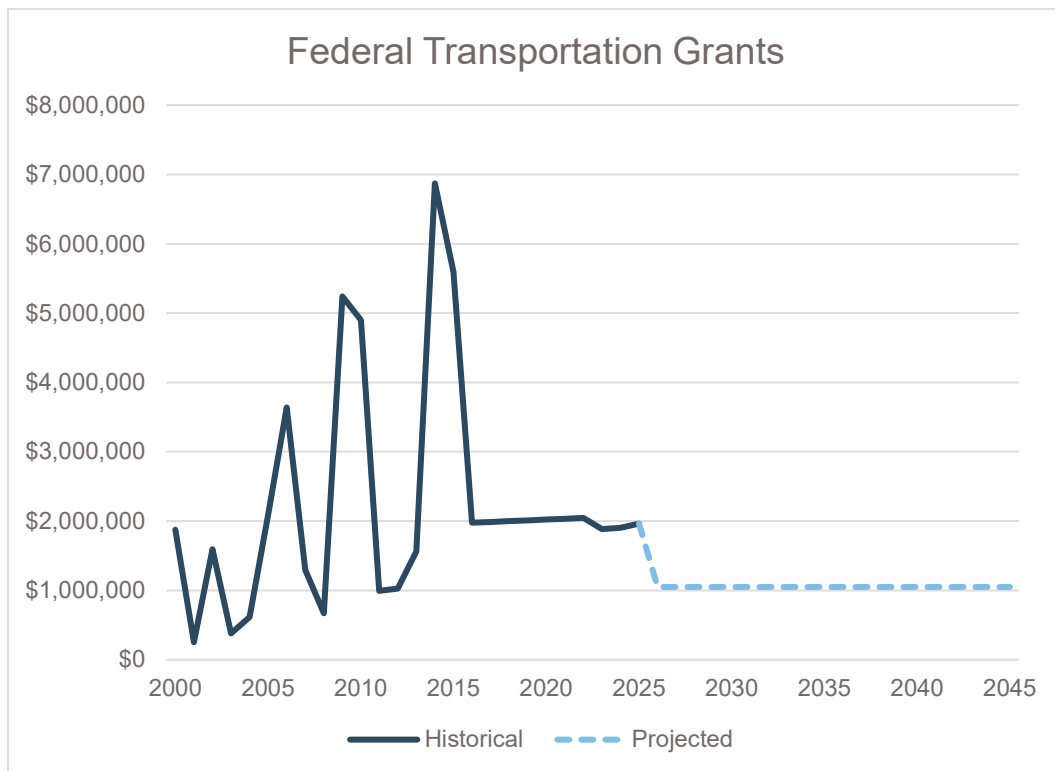


Table 16.4 shows anticipated total federal grant revenues for the next six years and the remaining 14 years of the planning period.

Table 16.4. Projected Future Whatcom County Federal Transportation Grant Revenues 2026-2045 (Allocated for Capital Projects)

Federal Grants Transpo.	2026	2027	2028	2029	2030	2031	Total 2026-2031	Total 2026-2045
Estimated Future Revenues	\$1,050,000	\$1,050,000	\$1,050,000	\$1,050,000	\$1,050,000	\$1,050,000	\$6,300,000	\$21,000,000

Table 16.5 shows total projected transportation revenues for Whatcom County.

Table 16.5. Projected Total Transportation Revenues 2026-2045 (Allocated for Capital Projects)

Transpo. Revenues	2026	2027	2028	2029	2030	2031	Total 2026-2031	Total 2026-2045
Estimated Future Revenues	\$7,535,500	\$7,535,500	\$7,535,500	\$7,535,500	\$7,535,500	\$7,535,500	\$45,213,000	\$150,710,000

Other Capital Revenues

Real Estate Excise Tax

Real Estate Excise Tax (REET) revenues are levied in two portions (1st and 2nd Quarter) and must be expended on capital projects. Since the REET is based on the total value of real estate transactions in a given year, the amount of REET revenues a county receives can vary substantially from year to year based on the normal fluctuations in the real estate market. During years when the real estate market is active, revenues are high, and during softer real estate markets revenues are lower.

REET is levied in two parts, REET I (the first 0.25%), and REET II (the second 0.25%), for a total tax of 0.5% of total assessed value. REET I and REET II revenues must be spent on capital projects that are listed in a county's current capital facilities plan. The definition of capital facilities, according to RCW 82.46.010, for REET funding is:

“those public works projects of a local government for planning, acquisition, construction, reconstruction, repair, replacement, rehabilitation, or improvement of streets; roads; highways; sidewalks; street and road lighting systems; traffic signals; bridges; domestic water systems; storm and sanitary sewer systems; parks; recreational facilities; law enforcement facilities; fire protection facilities; trails; libraries; administrative and judicial facilities...”

This analysis assumes an average annual rate of turn-over of existing property at 4.6%, considered normal or stable, for the period of 2026 – 2045 and assumes that all REET revenues will be available for the capital projects discussed in this plan.

Figure 16.5 shows historical Real Estate Excise Tax revenue with a solid line, and projected revenues with a dotted line.

Figure 16.5. Whatcom County Real Estate Excise Tax Revenues 2000-2045

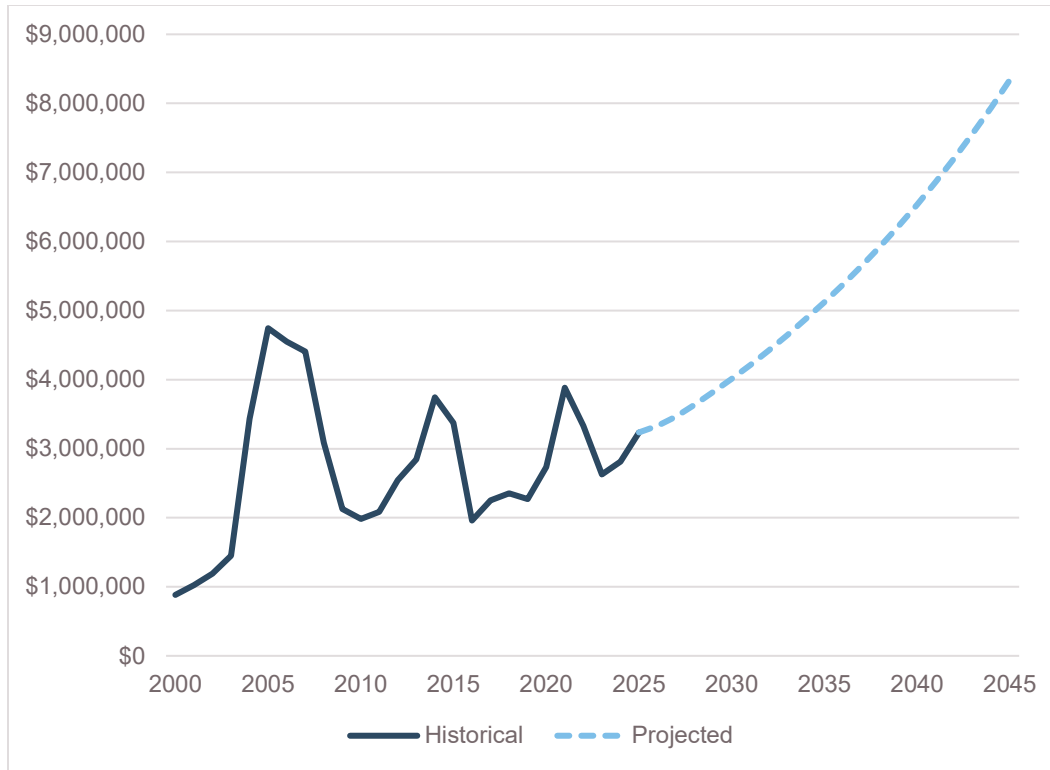


Table 16.6 shows anticipated total Real Estate Excise Tax revenues for the next six years and the remaining 14 years of the planning period.

Table 16.6. Projected Future Whatcom County Real Estate Excise Tax Revenues 2026-2045

Real Estate Excise Tax	2026	2027	2028	2029	2030	2031	Total 2026-2031	Total 2026-2045
Estimated Future Revenues	\$3,332,604	\$3,465,908	\$3,639,203	\$3,821,163	\$4,012,222	\$4,212,833	\$22,483,933	\$109,177,978

Rural Counties Public Facilities Tax (Rural Sales Tax)

Washington State allows rural counties to impose a local sales tax to fund capital projects that have an economic development purpose and finance personnel positions in economic development offices. This tax, which is deposited in the County's Public Utilities Improvement Fund, is not an additional sales tax for residents, but rather is given to the jurisdiction in the form of a tax credit against the 6.5% state sales tax.

Whatcom County began collecting the tax during 1999. It is currently levied at 0.09% in Whatcom County and is collected countywide. The law (RCW 82.14.370) states “For counties imposing the tax at the rate of .09 percent before August 1, 2009, the tax expires on the date that is twenty-five years after the date that the .09 percent tax rate was first imposed by that county.” Whatcom County’s expiration date is August 1, 2032. It is uncertain if this funding source will be renewed and available for capital construction, but for the purposes of this analysis, it assumed that rural sales tax revenue will not be available after 2032.

Executive recommendations adopted by the Whatcom County Council designate 30% of the proceeds of the tax revenue be used for County capital facilities. The remaining 70% is designated for economic development loans and grants to other government entities throughout the county (Economic Development Initiative – EDI). Figure 16.6 shows historical Rural Counties Public Facilities Tax revenue for County capital facilities with a solid line, and projected revenues with a dotted line

Figure 16.6. Whatcom County Rural Counties Public Facilities Tax Revenues 2000-2045(Available for County Capital Facilities)

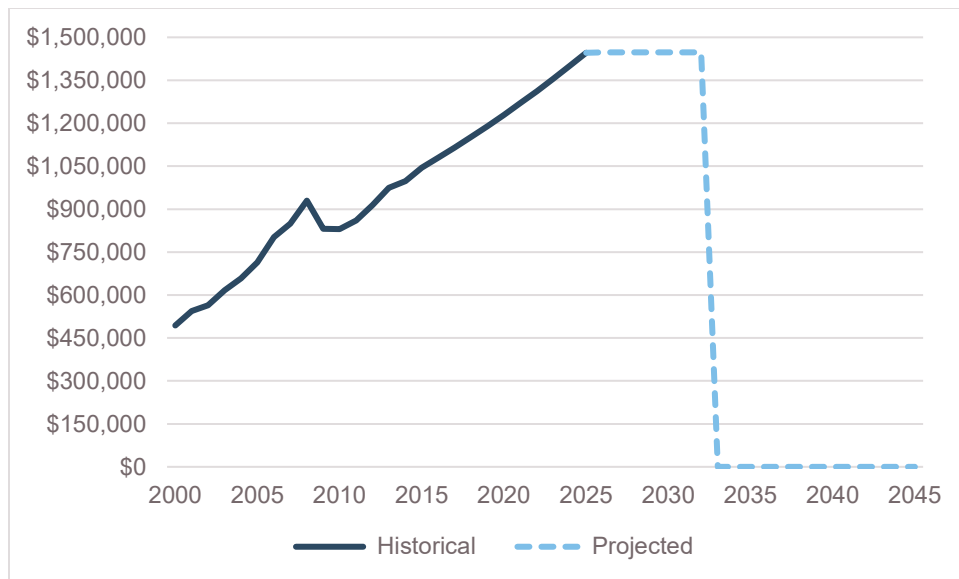


Table 16.7 shows anticipated total Rural Counties Public Facilities Tax revenues for County capital facilities for the next six years and the remaining 14 years of the planning period.

Table 16.7. Projected Future Whatcom County Rural Counties Public Facilities Tax Revenues 2026-2045(Available for County Capital Facilities)

Rural Counties Sales Tax	2026	2027	2028	2029	2030	2031	Total 2026-2031	Total 2026-2045
Estimated Future Revenues	\$ 1,447,500	\$ 1,447,500	\$ 1,447,500	\$ 1,447,500	\$ 1,447,500	\$ 1,447,500	\$ 8,685,000	\$ 10,132,500

Conservation Futures Revenues for Parks

In accordance with RCW 84.34.230, the County can impose a countywide property tax levy of \$.0625 per thousand dollars assessed valuation for the purpose of purchasing open space and future development rights. The current levy rate is \$.041756 per thousand. For planning purposes, the current (2024) annual average is assumed to be available for land purchases, which may include right-of-way needed for recreational trails. Figure 16.7 shows actual usage of Conservation Futures funding for park acquisitions with a solid line, and projected usage of future revenues with a dotted line .

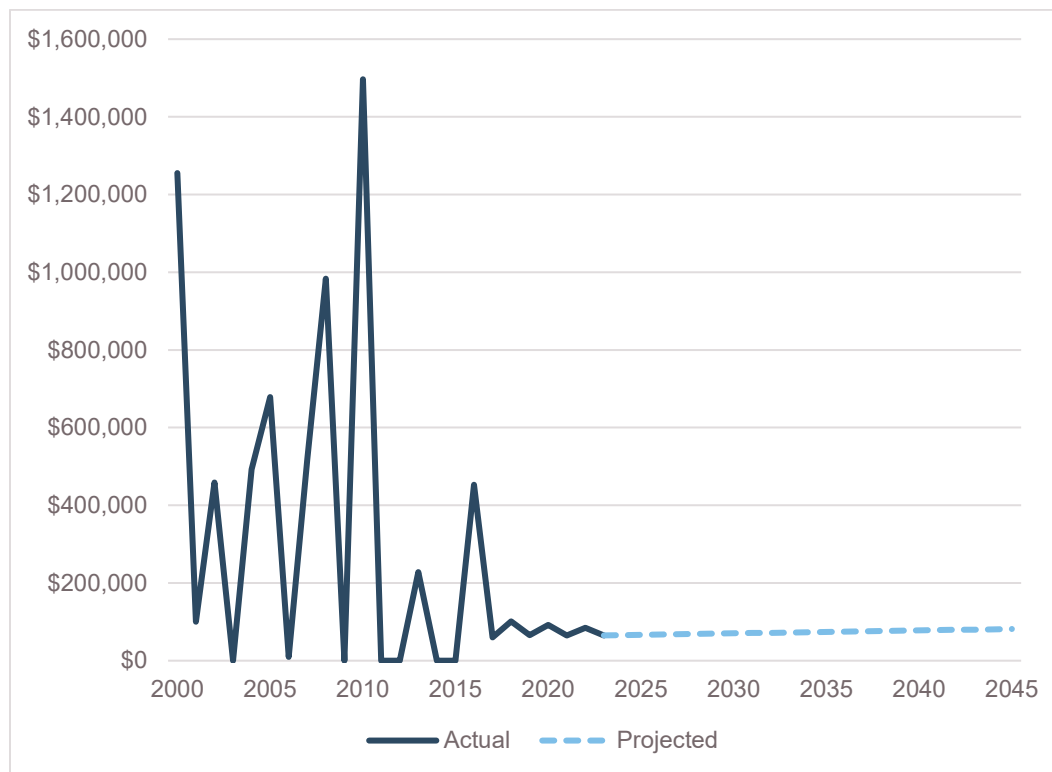
Figure 16.7. Conservation Futures Revenues 2000-2045 (Available for Parks Capital Acquisitions)

Table 16.8 shows anticipated Conservation Futures funding for Parks capital projects for the next six years and the remaining 14 years of the planning period.

Table 16.8. Projected Future Conservation Futures Revenues 2026-2045 (Available for Parks Capital Projects)

Conservation Futures	2026	2027	2028	2029	2030	2031	Total 2026-2031	Total 2026-2045
Estimated Future Revenues	\$67,328	\$68,078	\$68,828	\$69,578	\$70,328	\$71,078	\$415,215	\$1,489,051

Parks State Grants

Parks grants are applied for through the Washington State Recreation and Conservation Office. These funds have traditionally been quite limited and are distributed in a competitive process making it difficult to determine future grant funding levels. For this analysis, historical grant revenue trends were considered and the current (2024) average is assumed for future grant revenues, but these dollars could vary greatly from year to year since they are awarded on a project-specific and competitive basis.

Figure 16.8 shows historical state grant revenues with a solid line, and projected revenues with a dotted line.

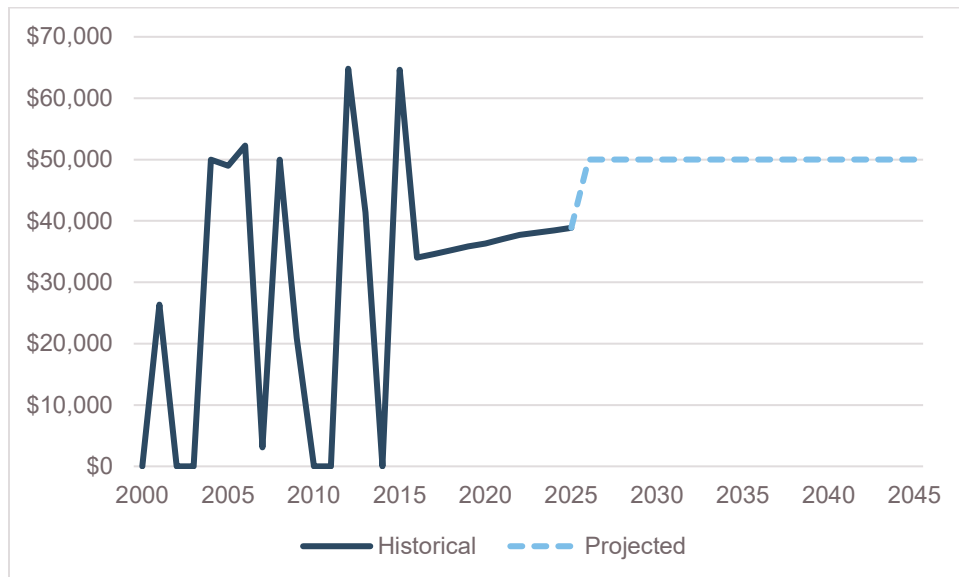
Figure 16.8. Parks State Grant Revenues 2000-2045(Allocated for Capital Projects)

Table 16.9 shows anticipated state grant revenues for Parks capital projects for the next six years and the remaining 14 years of the planning period.

Table 16.9. Projected Future State Grant Revenues 2000-2045 (Available for Parks Capital Projects)

Parks State Grants	2026	2027	2028	2029	2030	2031	Total 2026-2031	Total 2026-2045
Estimated Future Revenues	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$300,000	\$1,000,000

Stormwater State Grants

The Whatcom County Stormwater Fund was established in 2009 to account for projects and programs which protect water resources, improve water quality, and reduce impacts from stormwater runoff in the unincorporated areas of the county. State stormwater grants are applied for through the Washington State Department of Ecology.

These revenues have been estimated on a per capita basis on the assumption that over time a jurisdiction will generally receive its “fair share” of available grant revenues. Since 2009 Whatcom County has averaged \$3.18 per capita in grant revenues per year. This analysis conservatively assumes that a \$3 per capita rate continues in the future with no annual increase. Total revenues are therefore only expected to change on pace with changes in population. For this analysis average annual dollars are assumed in each year. However, in reality these dollars will vary greatly from year to year since they are awarded on a project-specific basis.

Figure 16.9 shows historical state grant revenues with a solid line, and projected revenues with a dotted line.

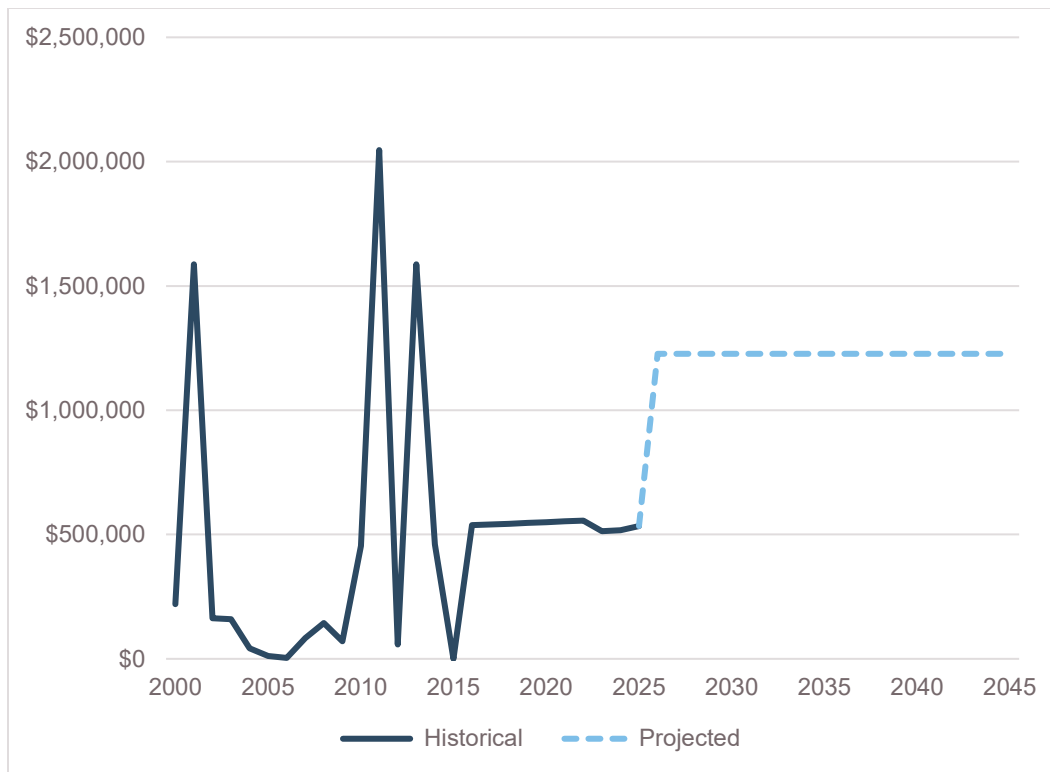
Figure 16.9. Stormwater State Grant Revenues 2000-2045 (Allocated for Capital Projects)

Table 16.10 shows anticipated state grant revenues for Stormwater capital projects for the next six years and the remaining 14 years of the planning period.

Table 16.10. Projected Future State Grant Revenues 2026-2045 (Available for Stormwater Capital Projects)

Stormwater State Grants	2026	2027	2028	2029	2030	2031	Total 2026-2031	Total 2026-2045
Estimated Future Revenues	\$35,000	\$35,000	\$35,000	\$35,000	\$35,000	\$35,000	\$210,000	\$700,000

Stormwater Federal Grants

The Whatcom County Stormwater Fund was established in 2009 to account for projects and programs which protect water resources, improve water quality, and reduce impacts from stormwater runoff in the unincorporated areas of the county. Federal stormwater grants are applied for from the Environmental Protection Agency and are awarded on a project-specific and competitive basis.

Federal grant funding has been more sporadic than state funding and this trend is expected to continue. The 2016 analysis assumed an average of approximately \$88,000

over the 2016-2036 planning period and this analysis assumes an annual average of \$100,000 for the 2026-2045 planning period. As with other grant funding sources, federal stormwater grant dollars will vary greatly from year to year since they are awarded on a project-specific and competitive basis. Figure 16.10 shows historical state grant revenues with a solid line, and projected revenues with a dotted line.

Figure 16.10. Stormwater Federal Grant Revenues 2000-2045 (Allocated for Capital Projects)

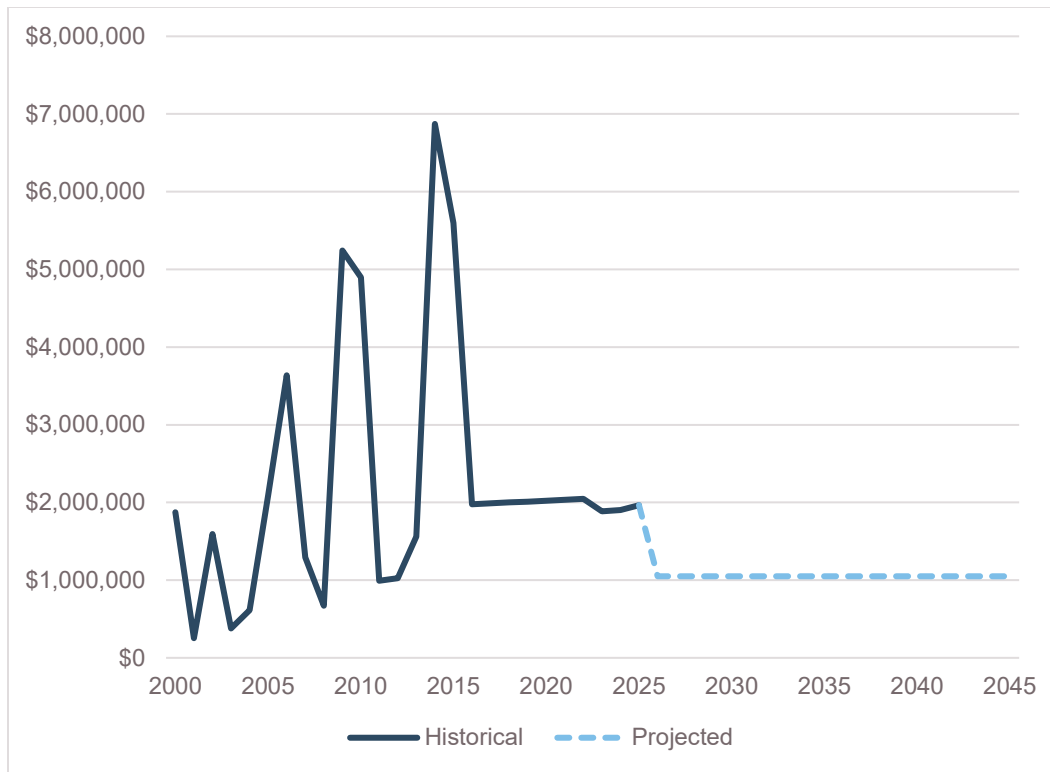


Table 16.11 shows anticipated federal grant revenues for Stormwater capital projects for the next six years and the remaining 14 years of the planning period.

Table 16.11. Projected Future Federal Grant Revenues 2000-2045 (Available for Stormwater Capital Projects)

Stormwater Federal Grant	2026	2027	2028	2029	2030	2031	Total 2026-2031	Total 2026-2045
Estimated Future Revenues	\$100,000	\$100,000	\$100,000	\$100,000	\$100,000	\$100,000	\$600,000	\$2,000,000

Total Other Capital Revenues

Table 16.12 summarizes total other capital revenues for the next six years and the remaining 14 years of the planning period.

Table 16.12. Projected Total Other Capital Revenues

Other Capital Revenues	2026	2027	2028	2029	2030	2031	Total 2026-2031	Total 2026-2045
Estimated Future Revenues	\$5,032,431	\$5,166,485	\$5,340,531	\$5,523,241	\$5,715,049	\$5,916,410	\$32,694,148	\$124,499,529

Total Capital Revenues

Table 16.13 summarizes total capital revenues (transportation and other) available for the next six years and the remaining 14 years of the planning period.

Table 16.13. Projected Total Capital Revenues

Total Capital Revenues	2026	2027	2028	2029	2030	2031	Total 2026-2031	Total 2026-2045
Estimated Future Revenues	\$12,567,931	\$12,701,985	\$12,876,031	\$13,058,741	\$13,250,549	\$13,451,910	\$77,907,148	\$275,209,529

Financial Impact of Unincorporated Population Centers

The Birch Bay and Columbia Valley unincorporated Urban Growth Areas (UGA) each have significant residential populations, which require water, sewer, stormwater, transportation, law enforcement, and emergency medical services at higher levels of service (LOS) than low-density and sparsely populated rural areas. As shown in the financial analysis, Whatcom County is a rural governmental agency with rural level financial resources. As Birch Bay and Columbia Valley continue to gain population, additional public services will be needed that Whatcom County may not be prepared to provide. Future County Councils will need to evaluate adopted LOS standards and make decisions about funding to maintain or adjust the LOS standards.

Options to Increase Revenue or Reduce Cost

Road Levy Banked Capacity

As discussed in the first section of this analysis, if a jurisdiction does not increase the Property Tax levy rate annually to collect the full 1.0% allowed increase in revenues, the difference between the collected value and the allowed 1.0% increase becomes “banked capacity” which may be collected in future years. In 2024, Whatcom County collected previously accrued banked capacity and raised property taxes to increase revenue. This has not been standard practice for Whatcom County, and it is assumed that the County

will revert to collecting property taxes at a level equal to the previous year's revenues, plus new construction, but not increase the levy rate to collect banked capacity, nor collect the allowed 1.0% annual increase. By not taking the maximum allowed annual revenue increase, the County's banked capacity will accrue each year, and a future County Council can decide if they wish to collect banked capacity.

Stormwater Management Revenue

Whatcom County's stormwater management programs address state and federal water quality mandates and localized drainage and flooding problems that affect urbanized landscapes. These include, but are not limited to, design and construction of stormwater facilities, enhanced development standards, aggressive maintenance schedules, and regular facility inspections associated with the Lake Whatcom Total Maximum Daily Load (TMDL) and the County's National Pollutant Discharge Elimination System (NPDES) Phase II permit. Stormwater management programs are supported locally by the Road Fund, Real Estate Excise Tax Fund II, Flood Control Zone District Fund, and Birch Bay Watershed and Aquatic Resources Management District. State grants are a substantial revenue source, particularly for the capital program.

Future stormwater management services may require additional revenues between year five and the end of the 20-year planning period. At the present time, it cannot be accurately predicted what the appropriate allocation of local revenues and the availability of state and federal funds will be for that period. New revenues collected explicitly for stormwater management may be needed.

Limiting New Transportation Improvement Program Projects

The County can prioritize its capital projects, such that new projects are only added to the annual Transportation Improvement Program (TIP) on an as-funds-are-available basis or if they are highly competitive candidates for state or federal transportation grant funding programs. This would result in a delay in implementation of some projects, especially lower priority improvements, but the TIP is a strategic planning document and is intended to be used to make the County's highest priority transportation investments. In addition, TIP projects intended to seek grant funding should be scaled relative to available grant funding resources. With the exception of bridges, any TIP project in excess of \$5,000,000 should be broken into logical and constructable phases that can be funded by one grant agency.

State and federal grants are cyclical, competitive, and sometimes require local matching funds to even apply. In addition, projects seeking grant funding must be strategically sized for cost, grant availability, and constructability. As an example, there may be a need for improvements along an entire arterial corridor, but the construction cost would be too much for the County or any one grant funding source to complete. Dividing the project into financially feasible phases would be a more strategic approach and more

likely to secure grant funding. Some grants are available each year, while others are only available every other year or every few years. Grant funding sources are also focused on spreading improvements throughout a state or a region, which means that there are practical limits on how much funding any one grant source can provide. Some grants require up to a 20% local match from the County, which means that only the most viable and competitive project candidates should be placed on the six-year TIP in any given year.

The Annual Concurrency Report will be supplemented with recommendations for priority multimodal transportation investments, scaled for constructability, and logical funding sources to be incorporated into the annual TIP adoption by the Whatcom County Council.

Transportation Benefit District

Whatcom County can create a sales tax-based Transportation Benefit District, which requires County voter approval, but could provide significant revenue from visitors to Whatcom County, such as Canadians.

Transportation Benefit Districts (TBDs) (Chapter 36.73 RCW) are independent taxing districts that can impose fees and/or taxes to fund transportation improvements. TBDs can be established via ordinance in jurisdictions ranging from a city to multi-county area. TBDs are intended to finance construction and improvements to roadways, high-capacity transportation systems, public transit systems, and other transportation management programs.

Sales and Use Tax (RCW 82.14.0455). Counties can authorize local TBDs that provide up to 0.2% local sales and use tax with voter approval. This tax must be authorized by voters and may not be in effect for longer than 10 years unless reauthorized by voters. This could provide a dedicated local funding source for various transportation improvements and could be further leveraged for state and federal grants for more expensive projects. It is difficult to gauge the annual revenue yield from this, but it could be a few million per year.

Transportation Impact Fees

Transportation Impact Fees are a financing tool that requires new development to pay a portion of the costs associated with infrastructure improvements that are “reasonably related” to that development. The GMA allows agencies to develop and implement a transportation impact fee program to help fund some of the costs of transportation facilities needed to accommodate growth. State law (Chapter 82.02 RCW) requires that impact fees be:

- Related to improvements to serve new developments and not existing deficiencies; assessed proportional to the impacts of new developments

- Allocated for improvements that reasonably benefit new development, and
- Spent on facilities identified in the Capital Facilities Plan.

In 2023, Senate Bill (SB) 5452 amended the GMA to explicitly allow “bicycle and pedestrian facilities that were designed with multimodal commuting as an intended use” to be included as TIF-eligible projects in TIF programs.

Legally, financing for improvements that will serve the new development cannot rely solely on impact fees and must include other sources of public funds, and the fees must be structured in a manner that ensures that funds collected do not exceed a proportionate share of the costs of improvements reasonably related to new development. Whatcom County has studied the potential implementation of a TIF program in the past (Transpo Group 2006), but to date has chosen not to adopt or implement a TIF revenue source for transportation infrastructure.

According to a Municipal Research Services Center (MRSC) 2024 TIF Comparison Chart, there are currently five counties (Clark, Kitsap, Pierce, Snohomish, and Thurston) in western Washington that have adopted and implemented TIF programs to help fund transportation infrastructure needed to serve planned growth. The cities of Bellingham, Blaine, Ferndale, and Lynden all charge TIF for new development. If the County were to implement a TIF program, annual revenue would vary based on County geography, the chosen TIF base rate, and the type and scale of development permitted each year.

Park Impact Fees

RCW 82.02.050 also authorizes the County to adopt Park Impact Fees (PIF) for parks and recreational facilities. The same rules and conditions for transportation impact fees would apply to park impact fees. If the County were to implement a PIF program, annual revenues would vary based on County geography, the chosen PIF base rate, and the type and scale of development permitted each year.

Additional Transportation Plans, Policies, and Grant Opportunities

State and federal grants are cyclical, competitive, and sometimes require local matching funds to apply, but Whatcom County can take actions to become eligible for additional state and federal grant funding opportunities.

Complete Streets Ordinance

Whatcom County can develop and adopt a Complete Streets ordinance to become eligible for up to \$1,000,000 per year in Washington Transportation Improvement Board (TIB) Complete Streets grant funds. This competitive grant funding program is well-funded, is offered annually, and complements the annual TIB Active Transportation Program (ATP) and Urban Arterial Program (UAP) [For unincorporated UGA areas] grants that Whatcom County is already eligible for. In 2025, eight counties (Clark, King,

Pierce, San Juan, Snohomish, Spokane, Thurston, Walla Walla) have adopted Complete Streets ordinances and are eligible for this grant. Based on valuation, Whatcom County has a 20% local fund match requirement for all TIB grant programs, but these state grant programs can help to fund the projects on Whatcom County's active transportation network.

Active Transportation Plan

Whatcom County and the Bicycle and Pedestrian Advisory Committee (BPAC) can update the 14-year old 2011 Pedestrian and Bicycle Plan to be current and consistent with the 2025 Transportation Element and best practices in transportation planning. The establishment of the countywide Active Transportation Network (ATN) allows Whatcom County to set minimum Multimodal LOS standards for existing County roads and State highways, but funding and developing a new Active Transportation Plan would allow Whatcom County to:

- Include broad and varied community engagement opportunities
- Involvement of stakeholder agencies, such as school districts and WTA
- Incorporation of County ADA Transition Plan improvement recommendations
- Refine recommendations for pedestrian and bicycle facilities in UGAs
- Prioritize investment opportunities according to active transportation needs
- Be more competitive for various state and federal transportation grant programs
- Inform a TIF-eligible project list if the County adopts a TIF program.

There may be planning grants available to help Whatcom County fund a much-needed update to this outdated plan.

Local Road Safety Plan

Whatcom County has developed a Local Road Safety Plan (LRSP) in the past but has not updated the LRSP in recent years due to delays in completing previously funded projects. WSDOT offers the County Safety Program every odd-numbered year, which requires the completion and submittal of a current LRSP based on the most recent WSDOT crash data to apply for Highway Safety Improvement Program (HSIP) grant funds. Currently, there is no minimum funding request and no local fund match requirement if the County can obligate funds within a specified time period. Whatcom County could be eligible to apply every two years for spot (corridor or intersection) or systemic (multi-location crossing improvements, etc.) safety improvement projects funded by HSIP that may cost about \$2,000,000.

Regional Safety Action Plan

Whatcom County participated in the creation of the 2025 WCOG Regional Safety Action Plan (RSAP) and is eligible for USDOT Safe Streets and Roads for All (SS4A) implementation grant funds. The SS4A program requires a minimum request for \$2,500,000 in federal funds along with a 20% (Minimum \$500,000) local fund match but can fund large projects that other grants may not be able to fund adequately. Whatcom County could also serve as a lead agency applicant in partnership with other cities for UGA transportation improvement projects or with WSDOT for transportation improvements along state highways. WSDOT is not an eligible applicant for SS4A grants. Whatcom County is also eligible to apply for a USDOT SS4A supplemental planning grant that could help the County fund an update to the 2011 Pedestrian and Bicycle Plan. A 20% local fund match would be required.

Existing Fund Balances

Table 16.14 presents existing fund balances as of the 2024 Q1 Report ending 12/31/2023 which are potentially available to support capital projects:

Table 16.14. Fund Balances Potentially Available For Capital Projects as of 12/23/2023

Fund Name	Balance	Applicable to:
Current Expense/General	\$32,209,465	Facilities
County Roads	\$12,931,642	Transportation & Facilities
County Jail	\$1,738,147	Facilities
Chemical Dependency/Mental Health	\$9,527,961	Facilities
Conservation Futures	\$1,013,109	Parks & PDR
Real Estate Excise Tax I	\$7,309,780	Facilities
Real Estate Excise Tax II	\$5,566,572	Parks & Stormwater
Public Utilities Improvement	\$20,416,273	Facilities
Jail Improvements	\$602,566	Facilities
Trial Court Improvements	\$80,339	Facilities
CH Building Envelope	\$4,377,093	Facilities
Lummi Nation Lease	\$1,991,946	Transportation
Birch Bay & Pedestrian	\$3,521,819	Transportation
New Jail Project Fund	\$1,195,789	Facilities
Academy Rd Stormwater	\$936,575	Stormwater
Totals	\$103,419,076	

Six-Year Funding Balance

Estimated revenues from transportation sources within the six-year time period (2026-2031) have been compared to capital project costs. The seven year Capital Improvement Plan includes 449,416,712 (2025-2031) of capital costs and this study presents \$275,209,529 of potential revenues. Additionally, Chapter 9 Transportation of the 20-year Capital Facilities Plan includes **\$393,019,228** in capital transportation improvement costs and this study presents **\$312,552,500** in potential transportation revenues. Several planning and policy options and strategies are available to Whatcom County to reduce costs and increase transportation revenues to help close this funding gap over time.

Economic Development Planning

In addition to this CFP and the County's Comprehensive Plan Economic Element, the County has also engaged in an economic development strategy through the Economic Development Investment (EDI) Program. The program plans for and funds infrastructure including but not limited to roads, bridges, water facilities, sanitary sewer facilities, and storm sewer facilities. Economic development planning efforts also resulted in a report entitled the Whatcom County Comprehensive Economic Development Strategy (CEDS) (October 2021) which identifies goals and strategies for growing the Whatcom County economy without sacrificing its natural assets. The CEDS identifies and prioritizes actions for achieving its goals. It also identifies projects, including their cost and potential funding sources, that are needed to help the County achieve its economic development goals. Executive recommendations adopted by the County Council designate 70% of the Rural Counties Public Facility Tax be set aside for economic development loans and grants to governmental entities throughout the county. As documented previously, the Rural Sales Tax expires August 1, 2032.

Exhibit A

Seven-Year Capital Improvement Program For Whatcom County Facilities 2025-2031

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Chapter 1 – Introduction

The Growth Management Act requires that the County’s Comprehensive Plan include a “capital facilities plan element” (RCW 36.70A.070(3)). The Whatcom County Comprehensive Plan calls for the County to develop and update the Six-Year Capital Improvement Program (CIP) for County projects every two years. The main purpose of the Capital Improvement Program is to identify priority capital improvement projects and estimated costs, outline a schedule for project completion, and designate funding sources for these projects based on a review of existing and projected population and revenue conditions for the six-year planning period. For the 2025-2031 planning period PDS has opted to make the update for seven years to better align it with future updates.

Growth Management Act Requirements

According to the Growth Management Act, a county’s capital facilities plan must include five items, which are shown below.

1. *An inventory of existing capital facilities owned by public entities, showing the locations and capacities of the capital facilities.*

Current inventories of existing County capital facilities, based upon information provided by various County departments, are included in each chapter of this document.

2. *A forecast of the future needs for such capital facilities.*

Chapter 4 of the Whatcom County Comprehensive Plan establishes numerical “level of service” standards for County parks and trails and contains policies relating to other County facilities. Capital facility needs are forecasted over the six-year planning period by applying the adopted level of service standards to the expected population in the year 2031 and by considering other relevant factors.

3. *Proposed locations and capacities of expanded or new capital facilities.*

General locations and capacities of proposed County facilities are indicated in this document (as applicable).

4. *At least a six-year plan that will finance such capital facilities within projected funding capacities and clearly identifies sources of public money for such purposes.*

This Seven-Year Capital Improvement Program presents costs and funding

sources for proposed County capital facilities (all figures are in 2024 dollars). There are a variety of funding sources that the County may utilize to pay for capital facilities, including real estate excise taxes (REET), sales tax, the Public Utilities Improvement Fund (also known as the Rural Sales Tax Fund, Economic Development Investment Fund or EDI Fund), Road Fund, state grants, federal grants and a variety of other sources.

- 5. A requirement to reassess the land use element if probable funding falls short of meeting existing needs and to ensure that the land use element, capital facilities plan element, and financing plan within the capital facilities plan element are coordinated and consistent.*

Finally, in accordance with the Growth Management Act, a requirement to reassess the land use element of the Comprehensive Plan if probable funding falls short of meeting existing needs and to ensure consistency between plans already exists in the Comprehensive Plan (Policy 4A-4).

Charter Provisions and the County Budget

In addition to Growth Management Act provisions relating to capital facilities, Section 6.30 of the County Charter also requires the County to include a six-year capital improvement program as part of the budget. Appropriations for 2024-2025 capital projects may be included in the biennial budget or may be adopted through the supplemental budget process. Ultimate funding for capital improvement projects is subject to County Council authorization in the adopted budget. Costs identified for 2026-2031 are included for planning purposes and review of potential future needs, but not for budget authorization at this time.

Chapter 2 – Parks, Trails, and Activity Centers

Parks

The 2024 inventory of County parks and open space areas is over 16,200 acres. This inventory is shown in Table 1 below.

Table 1. Existing Parks

Site No.	Park Name and Location	Acres
1	Alderwood Park, 3479 Willowwood Rd.	1.9
2	Bay Horizon Park, 7467 Gemini St.	68.2
3	Birch Bay Beach Park, 7930 Birch Bay Dr.	13.7
4	Birch Bay Conservancy Area, 7000 Point Whitehorn Rd.	45.0
5	Birch Bay Tidelands	151.0
6	Boulevard Park, 471 Bayview Dr.	1.4
7	Broadway Beach Access, 7497 Birch Bay Dr.	0.1
8	Cagey Road, 3130 Haxton Way	20.0
9	Camp 2 RR ROW, 3775 Camp 2 Rd.	2.3
10	Canyon Lake Community Forest, 8300 Mt. Baker Hwy.	2,266.0
11	Chuckanut Mountain Park, 745 Old Samish Rd.	987.9
12	Cottonwood Beach Access, 8191 Birch Bay Dr.	5.1
13	Deming Eagle Homestead Park, 5615 Truck Rd.	33.0
14	Dittrich Park, 319 E Lake Samish Rd.	25.2
15	Drayton Harbor Tidelands	0.3
16	Euclid Park, 1570 Euclid Ave.	2.2
17	Galbraith Mountain Access, 800 Birch Falls Dr.	20.0
18	Glacier Cemetery	0.5
19	Halverson Park, 5075 Anderson Rd.	5.6
20	Haynie Road, 2876 Haynie Rd.	1.9
21	Hegg, 3845 Blue Canyon Rd.	3.5
22	Hovander Homestead Park and Tennant Lake, 5299 Nielsen Rd.	333.4
23	Jackson Rd. Beach Access, 7465 Birch Bay Dr.	0.2
24	Jensen Family Forest Park, 8051 Stein Rd.	21.5
25	Josh VanderYacht Park, 4106 Valley Highway	2.0
26	Kickerville Road, 4110 Bay Rd.	2.6
27	Lake Whatcom Park, 3220 North Shore Rd.	4,853.0
28	Lighthouse Marine Park, 811 Marine Dr. in Point Roberts	20.5
29	Lily Point Marine Park, 2315 APA Rd. in Point Roberts	262.1
30	Little Squalicum Park, 640 Marine Dr.	12.7
31	Lookout Mountain Forest Preserve, 2537 Lake Louise Rd.	4,682.8
32	Lummi Island Beach Access, 2198 N. Nugent Rd.	0.2
33	Maple Beach Tidelands	100.9
34	Maple Creek Park, 7842 Silver Lake Rd.	73.1
35	Maple Falls Community Park, 7470 Second St.	4.2
36	Monument Park, 25 Marine Dr. in Point Roberts	6.9
37	Nugent's Corner River Access, 3685 Mt. Baker Highway	14.2
38	Ostrom Conservation Site, 4304 South Pass Rd.	38.6
39	Phillips 66 Soccer Park, 5238 Northwest Dr.	36.6
40	Point Whitehorn Marine Reserve, 6770 Koehn Rd.	54.1
41	Redwood Park, 3310 Redwood Ave.	0.3
42	Samish Park, 673 N. Lake Samish Dr.	30.6
43	Samish Way, 5170 Samish Way	1.4
44	Semiahmoo Park, 9261 Semiahmoo Parkway	291.9
45	Silver Lake Park, 9006 Silver Lake Rd.	413.4
46	South Fork Park, 1530 Mosquito Lake Rd.	642.5
47	South Lake Whatcom Park, 4144 S Bay Dr.	79.5
48	South Pass East, 4900 South Pass Rd.	0.5
49	South Pass West, 4190 South Pass Rd.	0.4
50	Squires Lake Park, 2510 Nulle Rd.	90.1
51	Stimpson Family Nature Reserve, 2076 Lake Louise Rd.	400.4
52	Sunnyside Landing, 2870 Northshore Rd.	6.3
53	Sunset Beach, 2580 West Shore Dr. on Lummi Island	7.0
54	Sunset Farm Park, 7977 Blaine Rd.	69.5
55	Ted Edwards Park, 4150 Oriental Ave.	3.5
56	Teddy Bear Cove Park, 1467 Chuckanut Dr.	11.2
57	Terrell Creek Access, 7417 Jackson Rd.	0.5
58	Terrell Creek Heron Rookery, 7065 Jackson Rd.	15.0
59	Terrell Creek Point, 7685 Birch Bay Dr.	6.7
60	Turner-Jaeger, 1975 Lake Louise Rd.	3.8
61	Welcome Bridge River Access, 5585 Mosquito Lake Rd.	0.6
TOTAL		16,249.5

Pursuant to RCW 36.87.130, there are also public access properties on right-of-way ends that intersect shorelines. Whatcom County also holds public access easements for recreational purposes on certain lands owned by the City of Lynden, Whatcom Land Trust and the Lummi Island Heritage Trust.

Future Needs

A level of service of 9.6 acres of developed parkland for every 1,000 people in the County was adopted in the Whatcom County Comprehensive Plan. The County’s existing parks will meet the adopted level of service over the seven-year planning period. However, the County is proposing park planning and capital improvement projects to increase service levels at existing park facilities. This includes developing the Birch Bay Beach Park to meet the longer term needs of a growing population. It also includes a robust update of the County’s Comprehensive Parks, Recreation, and Open Space plan to reflect current community needs and development of key park-specific plans to guide coordinated development of future park infrastructure and amenities.

Proposed Improvement Projects

Park improvement projects, totaling approximately \$49.2 million, are proposed over the seven-year planning period (see Table 4). Priorities include funding for environmental cleanup efforts associated with lead contaminated soils at Plantation Rifle Range, and improved shower and restroom facilities at Silver Lake Park, and restroom facilities at the Birch Bay Beach Park.

Trails

Whatcom County currently has over 79 miles of trails in various locations throughout the County. This inventory is shown in Table 2 below.

Table 2. Existing Trails

Site No.	Trail Name and Location	Miles
1	Bay Horizon/Bay Crest Trail	0.75
2	Bay to Baker Maple Falls-Glacier	4.00
3	Birch Bay Drive and Pedestrian Facility	1.58
4	Canyon Lake Community Forest	7.01
5	Chuckanut Mountain / Pine & Cedar Lakes	16.60
6	Deming Homestead Eagle Park, Truck Rd.	0.30
7	Hovander Homestead Park	3.20
8	Interurban, Chuckanut area	3.15
9	Jensen Family Forest Park, Stein Rd. and Birch Bay Lynden Rd.	0.67
10	Lake Whatcom Park	12.60
11	Lily Point, Point Roberts	2.00
12	Lookout Mountain Forest Preserve	6.80
13	Maple Creek Park, 7842 Silver Lake Rd., Maple Falls	1.28
14	Monument Park, 25 Marine Dr. in Point Roberts	0.35
15	Phillips 66 Soccer Park Trail (Used to be Northwest Soccer Park), Smith	0.38
16	Ostrom Conservation Site, 4304 South Pass Rd.	0.56
17	Point Whitehorn Marine Reserve, 6770 Koehn Rd, Birch Bay	0.81
18	Samish Park, 673 N. Lake Samish	1.38
19	Semiahmoo Park	0.63
20	Silver Lake Park, 9006 Silver Lake Rd.	5.28
21	South Fork Park	2.30
22	Squires Lake, 2510 Nulle Rd.	2.88
23	Stimpson Family Nature Reserve, 2076 Lake Louise Rd.	4.02
24	Sunset Farm, 7977 Blaine Rd.	0.56
25	Teddy Bear Cove	0.33
TOTAL		79.42

Future Needs

A level of service of 0.60 miles of trails for every 1,000 people in the County was adopted in the Whatcom County Comprehensive Plan. With projected population growth in Whatcom County over the next seven years, about 74 additional miles of trails would be needed by the year 2028 to serve the people of Whatcom County.

Proposed Improvement Projects

Trail improvement projects and associated facilities, totaling approximately \$8.3 million dollars, are proposed over the seven-year planning period (see Table 4). These projects would add up to 32.1 trail miles. The South Fork Park trails project would add 5.5 miles, the Lake Whatcom trails project would add up to 20 miles, Governors Point 2.6, and Bay to Baker Trail 4.0.

While there is a shortfall in trail miles provided by the County, there are other

trails that are owned/maintained by a variety of agencies or jurisdictions that provide recreational opportunities for Whatcom County residents and visitors.

Activity Centers

There are currently 13 activity centers that provide a variety of year-round programs for various age groups. The activity center inventory is shown in Table 3 below.

Table 3. Existing Activity Centers

Site No.	Activity Center Name and Location
1	Bay Horizon, 7511 Gemini Street
2	Bellingham Senior Activity Center, 315 Halleck Street
3	Blaine Community Senior Center, 763 G Street
4	East Whatcom Regional Resource Center, 8251 Kendall Rd
5	Everson Senior Center, 111 W. Main Street
6	Ferndale Senior Center, 1999 Cherry Street
7	Lynden Senior Center, 401 Grover Street
8	Plantation Rifle Range, 5102 Samish Way
9	Point Roberts Senior Center, 1487 Gulf Road
10	Roeder Home, 2600 Sunset Dr.
11	Sumas Senior Center, 461 2nd Street
12	Van Zandt Community Hall, 4106 Valley Highway
13	Welcome Senior Center, 5103 Mosquito Lake Rd

Note: The Blaine, Everson, Lynden and Sumas Centers are owned by these respective cities. The Point Roberts Center is owned by the Point Roberts Park District. Whatcom County provides and/or contracts for senior activities and recreational programming at these centers.

Future Needs

The Whatcom County Comprehensive Plan does not contain a level of service standard for activity centers. Rather, Comprehensive Plan Policy 4F-5 states:

Continue to provide and support activity centers, including senior centers, to serve the growing population of Whatcom County by the following methods, as needed, which are listed in priority order: (1) implementing programming changes, (2) adding space to existing centers, and/or (3) establishing new centers.

Proposed Improvement Projects

Eight activity center projects are proposed. These projects will cost about \$8.3 million within the seven-year planning period (see Table 4).

Seven-Year Capital Improvement Program

The park, trail, and activity center projects planned over the next seven years are shown below.

Table 4. Park, Trail, and Activity Center Projects

Project # and Name		Funding Source	Total									Totals	Type
			2025	2026	2027	2028	2029	2030	2031				
2 Alderson Rd End Day-Use Improvements	Parks	5,7	75,000	250,000	0	0	0	0	0	0	325,000	Park	
6 Birch Bay Beach Park Development	Parks	4, 5, 6, 7,	260,000	2,552,500	2,628,500	0	0	0	0	0	5,441,000	Park	
7 Canyon Lake Community Forest Access Road	Parks	4	10,000	10,000	0	0	0	0	0	0	20,000	Park	
8 EWRC - Building and Site Improvements	Parks	8, 13, 14	1,315,000	250,000	250,000	0	0	0	0	0	1,815,000	Activity Cen	
9 Ferndale Senior Center Building Repairs	Parks	1	125,000	214,350	214,350	0	0	0	0	0	553,700	Activity Cen	
10 Ferndale Senior Center HVAC Replacement at	Parks	1	0	0	0	0	0	335,000	0	0	335,000	Activity Cen	
11 Ditttrich Park Parking and Day Use Improver	Parks	2, 4	0	0	50,000	150,000	0	0	0	0	200,000	Park	
12 Glacier Restroom Site Improvements	Parks	7	38,500	261,500	0	0	0	0	0	0	300,000	Park	
13 Governors Point Acquisition and Trailhead de	Parks	1, 2, 5	1,132,500	212,500	0	0	0	0	0	0	1,345,000	Park	
15 Hovander Flood Repair and Mitigation	Parks	3	100,000	200,000	0	0	0	0	0	0	300,000	Park	
16 Hovander Maintenance Shop Facility Progr	Parks	2	1,415,000	0	0	0	0	0	0	0	1,415,000	Park	
18 Hovander Rental Residence Demolition	Parks	2	55,000	0	0	0	0	0	0	0	55,000	Park	
19 Hovander Slough Bridge Replacement	Parks	2	0	0	100,000	200,000	0	0	0	0	300,000	Park	
20 Jensen Family Nature Reserve Parking Lot Im	Parks	2	0	0	0	0	0	0	450,000	0	450,000	Park	
21 Lake Whatcom Park Forest Management Plai	Parks	2, 4, 6, 8,	200,000	200,000	500,000	200,000	400,000	200,000	0	0	1,700,000	Park	
22 Lake Whatcom Park Trail Development and C	Parks	2	121,500	580,000	125,000	492,000	520,400	547,100	0	0	2,386,000	Trail	
23 Lake Whatcom Park Trailhead Improvement:	Parks	2	0	0	0	0	325,000	250,000	0	0	575,000	Trail	
24 Point Roberts Public Boat Launch	Parks	5, 8	400,000	425,000	425,000	0	0	0	0	0	1,250,000	Park	
25 Lighthouse Marine Park - Master Plan/Park I	Parks	4, 8	0	0	250,000	265,000	0	0	0	0	515,000	Park	
28 Lookout Mountain Forest Preserve Parking I:	Parks	2	0	0	0	124,100	300,000	0	0	0	424,100	Trail	
29 Lookout Mountain Forest Preserve LM 2000	Parks	2, 3, 4	500,000	0	0	0	0	0	0	0	500,000	Park	
30 Maple Falls Community Park Maintenance Bt	Parks	2	158,000	0	0	0	0	0	0	0	158,000	Park	
31 Maple Falls Community Park Trailhead Imprc	Parks	2, 7, 8	0	0	200,000	825,000	0	0	0	0	1,025,000	Park	
32 Miscellaneous Parks Capital Improvements	Parks	2	150,000	150,000	150,000	150,000	0	0	0	0	600,000	Park	
33 Multi-Modal Regional Trail Planner Position	Parks	2, 10	128,662	133,138	141,785	151,228	161,540	172,801	0	0	889,154	Trail	
34 Multi-Modal Regional Trail Planning Design a	Parks	1, 5, 6, 8	80,000	247,000	950,000	950,000	340,000	240,000	0	0	2,807,000	Trail	
35 Parks Headquarters	Parks	14	872,400	0	0	0	0	0	0	0	872,400	Park	
36 Parks Construction Supervisor	Parks	2	50,000	50,000	50,000	50,000	50,000	50,000	50,000	0	350,000	Park	
37 Plantation Rifle Range Site Acquisition	Parks	5	0	0	0	0	750,000	0	0	0	750,000	Activity Cen	
38 Plantation Indoor Range Targeting System Re	Parks	1, 8	0	530,000	0	0	0	0	0	0	530,000	Activity Cen	
39 Plantation Rifle Range Lead Remediation and	Parks	1, 8	1,904,857	1,904,857	1,904,857	1,904,857	1,904,857	1,904,857	1,904,858	0	13,334,000	Activity Cen	
41 Roeder Home Historic Structure Stabilization	Parks	2, 8	100,000	0	0	0	0	0	0	0	100,000	Activity Cen	
42 Samish Park Retaining Wall Stabilization and I	Parks	2	35,000	50,000	0	0	0	0	0	0	85,000	Park	
43 Samish Park Residence Delolition	Parks	2	60,000	0	0	0	0	0	0	0	60,000	Park	
44 Samish Park Water System	Parks	2	100,000	360,000	0	0	0	0	0	0	460,000	Park	
45 Semiahmoo Park Sewage Pump Replacement	Parks	2	348,800	0	0	0	0	0	0	0	348,800	Park	
46 Silver Lake Park Boat Launch Renovation	Parks	2	97,750	201,250	0	0	0	0	0	0	299,000	Park	
47 Silver Lake Park Cabin and Lodge Renovation	Parks	2	0	62,458	0	0	0	0	0	0	62,458	Park	
48 Silver Lake Park Cedar Campground Improve	Parks	2	0	0	0	0	0	0	750,000	0	750,000	Park	
49 Silver Lake Park Group Camp Improvements	Parks	2	0	0	0	0	0	0	480,000	0	480,000	Park	
50 Silver Lake Park Lagoon Trail Renovation/Lag	Parks	2	0	57,500	200,000	0	0	0	0	0	257,500	Park	
52 Silver Lake Park Red Mt Campground Improv	Parks	2	0	0	0	0	0	0	750,000	0	750,000	Park	
53 Silver Lake Park Rental Residence Demolition	Parks	2	0	0	0	0	0	0	125,000	0	125,000	Park	
54 Silver Lake Park Utility Improvements	Parks	2	335,000	1,515,000	0	0	0	0	0	0	1,850,000	Park	
56 South Fork Park Loop Trail Improvements	Parks	2	0	0	0	0	0	0	276,600	0	276,600	Trail	
57 South Fork Park Nesset Farm Gateway Impr	Parks	2, 6	0	156,000	845,000	0	0	0	0	0	1,001,000	Trail	
59 Van Zandt Community Hall Renovation	Parks	2, 6, 8	452,000	333,000	0	0	0	0	0	0	785,000	Activity Cen	
Total			10,619,969	10,906,053	8,984,492	5,462,185	4,751,797	3,699,758	4,786,458		49,210,712		

Funding Sources:

1. Real Estate Excise Tax (REET 1)
2. Real Estate Excise Tax (REET 2)
3. Federal Emergency Management Agency (FEMA)
4. Parks Special Revenue Fund
5. Conservation Futures Funds
6. Donations
7. Lodging Tax (Hotel-Motel Tax)
8. Grants
9. Whatcom Policy Group
10. County Road Fund
11. Transportation Benefit District
12. General Fund
13. ARPA
14. EDI

Chapter 3 – Maintenance and Operations

Existing Maintenance and Operations Space

The 2022 inventory of maintenance & operations/facilities management space is 70,681 square feet. This inventory is shown below.

Table 5. Existing Space

Site No.	Facility Name	Square feet
1	Central Shop, 901 W. Smith Rd. (Maintenance and Operations)	35,773
2	3720 Williamson Way (Facilities Management)	31,248
3	Minimum Security Correction Facility - 2030 Division St. (Facilities Management Storage)	3,660
TOTAL		70,681

Future Needs

The Whatcom County Comprehensive Plan does not contain a level of service standard for maintenance and operations. The County will budget for improvements to such facilities as needed.

Proposed Improvement Projects

Improvement and maintenance projects on existing buildings and sites over the seven-year planning period total over \$3.7 million as shown below.

Table 6. Maintenance and Operations Projects

Project # and Name	Funding Source	2025	2026	2027	2028	2029	2030	2031	Total Cost
1 Central Shop NPDES Permit Compliance Plan - 901 W. Smith Rd.	1	\$ 1,200,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	1,200,000
2 Road Oil Tank Removal - 901 W. Smith Rd.	1	\$ 30,000	\$ 100,000	\$ 200,000	\$ -	\$ -	\$ -	\$ -	330,000
3 Salt Storage Building - 901 W. Smith Rd.	1	\$ 150,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	150,000
4 NE Truck Shed Structural Repair - 901 W. Smith Rd.	1	\$ 160,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	160,000
5 Fuel Tank Removal and Abatement - 901 W. Smith Rd.	1	\$ 1,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	1,000,000
6 NPDES Vactor Building - 901 W. Smith Rd.	1	\$ -	\$ 750,000	\$ -	\$ -	\$ -	\$ -	\$ -	750,000
7 Site Prep of Anti Icing Brine System- 901 W. Smith Rd.	1	\$ 150,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	150,000
TOTAL		\$ 2,690,000	\$ 850,000	\$ 200,000	\$ -	\$ -	\$ -	\$ -	3,740,000

Funding Sources

1. Road Fund
2. Federal and State Grant Funded

Chapter 4 – General Government Buildings and Sites

Existing Office Space

The 2024 inventory of County government office space is 313,395 square feet at eleven locations. This inventory is shown below.

Table 7. Existing County Government Office Space

Site No.	Facility Name	Square feet
1	Civic Center Annex (322 North Commercial)	30,000
2	Central Plaza Building (215 N. Commercial)	10,307
3	County Courthouse (311 Grand Avenue)	178,476
4	Lottie St. Annex (316 Lottie St.)	2,533
5	509 Girard St.	13,189
6	3373 Mt. Baker Highway	2,110
7	1500 N. State St.	20,045
8	Northwest Annex (5280 Northwest Dr.)	20,265
9	Crisis Stabilization Center (2026 Division St.)	24,450
10	110 Unity Street	21,800
11	121 Unity Street	1,200
TOTAL		324,375

The County also rents 4,820 of building space at 600 Dupont St.

Future Needs

The Whatcom County Comprehensive Plan does not contain a level of service standard for general government buildings. The County will budget for improvements to such facilities as needed.

Proposed Improvement Projects

Improvement and maintenance projects on existing buildings and sites over the seven-year planning period total approximately \$57.6 million as shown below.

Table 8. Government Building and Site Projects

Project Name	Department	Funding Sources	2025	2026	2027	2028	2029	2030	2031	Total
Annual Security Equipment End of Facilities	Facilities	1, 2	50,000	50,000	50,000	50,000	50,000	50,000	50,000	350,000
Courthouse Locks	Facilities	1, 2	-	-	-	30,000	30,000	-	-	60,000
Courthouse South Parking Lot Grir	Facilities	1, 2	205,000	-	-	-	-	-	-	205,000
Asphalt Replacement	Facilities	1	-	60,000	60,000	60,000	60,000	60,000	60,000	360,000
Carpet Replacement	Facilities	1	75,000	75,000	75,000	75,000	75,000	75,000	75,000	525,000
Interior Painting	Facilities	1	62,500	62,500	62,500	62,500	62,500	62,500	62,500	437,500
Point Roberts Sheriff Compound R	Facilities	1	-	37,500	-	-	-	-	-	37,500
ADA Compliance	Facilities	1	40,000	40,000	40,000	40,000	40,000	40,000	40,000	280,000
Construction Coordinator	Facilities	1	10,000	10,000	10,000	10,000	10,000	10,000	10,000	70,000
Elevator Replacements	Facilities	1, 2	575,500	339,400	-	-	-	-	-	914,900
NW Annex Debt Service	Facilities	1, 2, 11	2,455,662	2,455,662	2,455,662	2,455,662	2,455,662	2,455,662	2,455,662	17,189,634
Courthouse Exterior	Facilities	1, 2	2,051,898	2,051,898	2,051,898	2,051,898	2,051,898	-	-	10,259,490
ADA Courtroom Improvements	Facilities	1	300,000	-	-	-	-	-	-	300,000
Electric Vehicle Charging Station	Facilities	2, 12	250,000	250,000	-	-	-	-	-	500,000
23-Hour Crisis Relief Center	Facilities	6	19,200,000	3,250,000	-	-	-	-	-	22,450,000
Unity Street Purchase and Tenant	Facilities	6	500,000	-	-	-	-	-	-	500,000
Solar Retrofits	Facilities	2, 6	250,000	250,000	250,000	250,000	250,000	250,000	250,000	1,750,000
Jail Security Upgrades	Facilities	6	200,000	150,000	-	-	-	-	-	350,000
County Building Maintenance	Facilities	2	50,000	50,000	50,000	50,000	50,000	50,000	50,000	350,000
Courthouse Boiler Repairs	Facilities	1	100,000	-	-	-	-	-	-	100,000
Building Acquisitions	Facilities	12	100,000	100,000	100,000	100,000	100,000	100,000	100,000	700,000
Totals			\$ 26,475,560.00	\$ 9,231,960.00	\$ 5,205,060.00	\$ 5,235,060.00	\$ 5,235,060.00	\$ 3,153,162.00	\$ 3,153,162.00	\$ 57,689,024.00

Chapter 5 – Sheriff’s Office

Existing Sheriff’s Office Space

The 2022 inventory of Sheriff’s office space is 22,902 square feet. This inventory is shown below.

Table 9. Existing Sheriff’s Facilities

Site No.	Facility Name	Square Feet
1	Public Safety Building (311 Grand Ave)	15,102
2	Minimum Security Correction Facility (2030 Division St.)	6,000
3	Laurel Substation (194 W. Laurel Rd.)	1,800
TOTAL		22,902

Notes: The Sheriff’s Office also has storage facilities at various locations in Whatcom County. The County has two mobile homes and an old detention facility in Point Roberts. The resident deputies operate out of their homes or utilize space at the U.S. Customs office at the border. Deputies are able to utilize an office at the Kendall Fire hall when working in the area.

Future Needs

The Whatcom County Comprehensive Plan does not contain a level of service standard for Sheriff’s Office facilities. Rather, Comprehensive Plan Policy 4D-2 is to:

Maintain Sheriff’s Office adult corrections facilities and headquarters to provide a safe environment for the community, staff and inmates. . . Existing facilities may be expanded, remodeled, and/or new facilities developed in response to changing need.

Proposed Improvement Projects

A new Sheriff’s Office and a new public safety radio system are planned within the next seven years. The comprehensive radio system update will include infrastructure (such as towers), radio systems in buildings, radios in vehicles, and hand-held radios. These improvements will cost approximately \$12 million, as shown below.

Table 10. Sheriff's Office Projects

Project # and Name		Funding Source	2025	2026	2027	2028	2029	2030	2031	
Sheriff's Office Debt Service	Facilities		-	-	1,718,963	1,718,963	1,718,963	1,718,963	1,718,963	8,594,815
Sheriff Impound Storage Lot	1		92,000	-	-	-	-	0	0	92,000
Public Safety Radio System	3		1,782,000	1,028,500	275,000	275,000	-	0	0	3,360,500
Totals			1,874,000	1,028,500	1,993,963	1,993,963	1,718,963	1,718,963	1,718,963	12,047,315

Funding Sources

1. Real Estate Excise Tax (REET)
2. Debt
3. Grants
4. Economic Development Investment (EDI) Fund
5. Fire Districts/Departments
6. Countywide Emergency Medical Services (EMS) Fund

Chapter 6 – Emergency Management

Existing Emergency Management Space

The 2022 inventory of Sheriff’s Office, Division of Emergency Management space is 24,000 square feet, located at the Whatcom Unified Emergency Coordination Center (WUECC). Rented by and shared between both Whatcom County and the City of Bellingham, the WUECC is comprised of 2,000 square feet of office space and an additional 22,000 square feet of support facilities (used for meetings, training, exercises, and during emergencies). The WUECC serves as the Emergency Operations Center for both the County and the City.

Table 11. Existing Emergency Management/EOC Facilities

Site No.	Facility Name	Square feet
1	Whatcom Unified Emergency Coordination Center 3888 Sound Way, Bellingham	24,000

Future Needs

The Whatcom County Comprehensive Plan does not contain a level of service standard for emergency management facilities. Rather, Comprehensive Plan Policy 4D-4 is to:

Maintain adequate facilities for daily emergency management activities and, during an emergency or disaster, for the emergency operations center. The facilities will provide sufficient space for activities relating to emergency/disaster planning, mitigation, response and recovery. Existing facilities may be expanded, remodeled, and/ or new facilities developed in response to changing need.

The County will budget for improvements to such facilities as needed.

Proposed Improvement Projects

There are no emergency management capital improvement projects planned over the next seven years.

Chapter 7 – Adult Corrections

Existing Jail Facilities

The County’s Main Jail was designed and originally built to hold 148 beds, although with some limited remodeling and the use of double bunking, the operational capacity of the main jail should be for the use of 212 beds. Whatcom County completed construction of a 150 bed minimum security correction facility on Division St. in 2006. The Main Jail is located in the Public Safety Building next to the County Courthouse in downtown Bellingham and the Minimum Security Correction Facility is located in the Bakerview Rd. industrial area.

Table 12. Existing Jail Beds

Site No.	Facility Name	Jail Beds
1	Public Safety Building (311 Grand Ave.)	211
2	Jail Work Center (2030 Division St.)	<u>148</u>
TOTAL		359

Note: As the result of the COVID-19 pandemic, the jail is operating at a reduced capacity to provide for social distancing until such time as the pandemic is declared under control by the Washington State Department of Health. Due to the mix of offenders, a firm population cap has not been set, but is anticipated to remain at approximately 150 offenders at the Downtown Jail.

Future Needs

There continues to be serious concerns among law and justice officials related to jail facility needs in the community. That need has been documented over the years, with the most recent being the *Building Assessment Studies and Cost Estimates for Capital Improvements at the Jail (Public Safety Building)* (Sept. 2017).

The Whatcom County Comprehensive Plan does not contain a level of service standard for jail facilities. Rather, Comprehensive Plan Policy 4D-2 is to:

Maintain Sheriff’s Office adult corrections facilities and headquarters to provide a safe environment for the community, staff and inmates. The number of jail beds in adult corrections facilities will be determined after review of multiple factors, including projected population growth, State sentencing laws, alternative programs, treatment diversion programs, early release programs, the need to

separate violent inmates, the need to separate inmates by gender, the need to separate inmates by other classification considerations, average length of stay, peak inmate populations and available funding. Existing facilities may be expanded, remodeled, and/ or new facilities developed in response to changing need.

Proposed Improvement Projects

The adult corrections projects planned over the next seven years are shown below. These improvements will cost approximately \$178 million, as shown below.

Table 13. Adult Corrections Projects

Project # and Name	Department	Funding Source	2025	2026	2027	2028	2029	2030	2031	Total
Jail Facilities Ongoing Maintenance	Facilities	1	200,000	200,000	200,000	200,000	200,000	200,000	200,000	1,400,000
New Jail	Facilities	2	17,456,170	28,495,367	64,713,056	50,933,456	15,011,611	-	-	176,609,661
Totals			17,656,170	28,695,367	64,913,056	51,133,456	15,211,611	200,000	200,000	178,009,661
<u>Funding Sources</u>										
1. Other Sources (Grants, Special Revenue Funds, Donations)										
2. New Sales Tax										
3. Jail Fund										
4. General Fund										

Chapter 8 – Juvenile Detention

Existing Juvenile Detention Facilities

The 2022 inventory of County juvenile detention facilities includes 32 beds serving the countywide population. The juvenile detention facility is located on the sixth floor of the County Courthouse at 311 Grand Avenue.

Table 14. Existing Juvenile Detention Beds

Site No.	Facility Name	Beds
1	County Courthouse (311 Grand Ave.)	32

Future Needs

The Whatcom County Comprehensive Plan does not contain a level of service standard for juvenile detention facilities. Rather, Comprehensive Plan Policy 4D-3 is to:

Maintain juvenile detention facilities and alternative corrections programs to provide safe and secure methods to provide accountability and support for minors who break the law. Existing facilities may be expanded, remodeled, and/or new facilities developed in response to changing need.

The County will budget for improvements to such facilities as needed.

Proposed Improvement Projects

There are no juvenile detention capital improvement projects planned in the seven-year planning period.

Chapter 9 – Transportation

Existing Roads

The 2023 inventory shows a total of 934.86 miles of County roads.

Future Needs

The Whatcom County Comprehensive Plan sets level of service (LOS) standards for County roads. Future traffic and the level of service for roads can be forecasted using computer-modeling software. The Whatcom Council of Governments forecasts future traffic utilizing a computer transportation model. This modeling effort will inform transportation planning in Whatcom County.

Whatcom County accomplishes planning for County road improvements by approving a Six-Year Transportation Improvement Program each year, as required by RCW 36.81.121.

Proposed Improvement Projects

The Whatcom County Six-Year Transportation Improvement Program includes preliminary planning for one proposed new road project:

- Lincoln Road extension (between Harborview Road and Blaine Road).

While this project is on the Six-Year Transportation Improvement Program, construction is not anticipated within the six-year planning period. Rather, preliminary engineering to determine project feasibility may be initiated within this time frame. The Transportation Improvement Program includes 4 projects over \$5 million:

- North Lake Samish Rd. Bridge Replacement (\$12 million); and
- Birch Bay Lynden Rd/California Ck Culvert Replacement (\$7.1 million); and
- Jackson Road/Terrell Creek Bridge Replacement (\$5.7 million); and
- East Smith Rd / Hannegan Rd intersection improvements (\$5.2 million).

The Six-Year Transportation Improvement Program contains a variety of other projects, including flood damage repair, bridge replacements, intersection improvements, road reconstruction, multimodal and fish

passage projects.

Existing Ferry Facilities

Whatcom County currently has one ferry vessel serving Lummi Island. The ferry runs between Lummi Island and Gooseberry Point on a daily basis.

Future Needs

Whatcom County Comprehensive Plan Policy 6A-1 establishes the following LOS standard for the ferry:

Public Works shall establish a performance metric to monitor service performance of the Lummi Island ferry system. This will include a week long count at least every quarter in both sailing directions. This count will include percent capacity, on-time performance, and the number of vehicles left in the queue. The count shall be compared to the desired level of service of no more than two sailing waits during average weekday peak periods.

The Special Programs Manager for the County Public Works Department confirmed that the ferry service currently meets the LOS standard.

Whatcom County accomplishes planning for the ferry by approving a Fourteen-Year Ferry Capital Program, as required by RCW 36.54.015.

Proposed Improvement Projects

The Six-Year Transportation Improvement Program includes replacement of the Whatcom Chief ferry (\$43 million budgeted) and terminal modifications. It also includes engineering for relocation of the ferry terminal.

Total Transportation Costs

Transportation projects, including road and ferry projects, total approximately \$130.5 million over the six-year planning period. This includes almost \$67 million in local funds, with the remainder coming from the State and Federal governments.

Chapter 10 – Stormwater Facilities

Existing Stormwater Management Facilities

The Public Works Department is responsible for design, engineering, and construction of county-owned stormwater facilities. Many stormwater facilities are road-related stormwater conveyance systems such as culverts and ditches on and adjacent to county roads. Others are off right-of-way facilities that control storm flows and improve water quality.

In response to increasing federal and state mandates to manage stormwater and the public's desire to improve stewardship of sensitive watersheds, Whatcom County established a Stormwater Division in 2005. The Stormwater Division is responsible for planning, designing, engineering, and construction of stormwater facilities. Inventories of existing stormwater facilities are maintained by the Public Works Department. The Engineering Services Division maintains an inventory of all road-related facilities. The Stormwater Division maintains an inventory of public and private stormwater facilities in the area covered by the County's NPDES Phase II permit for Municipal Separate Storm Sewer Systems. This inventory includes ditches, culverts, catch basins, vaults, ponds, and swales. Completed Stormwater Construction Projects since the Stormwater Division was created in 2005 are listed below.

Table 15. Completed Stormwater Construction Projects Since 2005

Existing Site No.	Watershed	Facility Name	Year Completed
1	Lake Whatcom	Geneva Stormwater Retrofits	2006
2	Lake Whatcom	Cable Street Reconstruction & Stormwater Improvements	2007
3	Lake Whatcom	Lahti Drive Stormwater Improvements	2010
4	Lake Whatcom	Silver Beach Creek Improvements - Brownsville Drive to E. 16th Place	2011
5	Lake Whatcom	Silver Beach Creek Improvements - West Tributary	2012
6	Lake Whatcom	Coronado-Fremont Stormwater Improvements	2014
7	Lake Whatcom	Cedar Hills-Euclid Stormwater Improvements	2016
8	Lake Whatcom	Agate Bay Improvements-Phase 1 & 2	2018-2019
9	Lake Whatcom	Northshore/Edgewater Stormwater Improvements	2020
10	Lake Whatcom	Silver Beach Creek Phase 1-Woodlake	2021



Figure 1. Lake Whatcom Cedar Hills-Euclid Stormwater Improvements

Whatcom County Public Works regularly seeks and is awarded grant money that contributes to the design and construction of these stormwater projects that improve water quality through treatment systems and stream stabilization.

Future Needs

An increasing emphasis on the protection of sensitive watersheds has resulted in the adoption of comprehensive stormwater plans, including plans for Lake Whatcom and Birch Bay. The adopted plans identify work towards planning, design, engineering, and construction of capital projects intended to address stormwater issues.

Whatcom County and the Washington State Department of Ecology collaborate on the Swift Creek flood control and sediment management project. Whatcom County has developed an action plan and will continue to implement the plan with state funds.

Proposed Improvement Projects

Stormwater improvement projects totaling approximately \$18.2 million are proposed over the seven-year planning period as shown below. These costs would be paid by Real Estate Excise Tax (REET), Lake Whatcom Stormwater Utility, grants, Road fund, funding from the Birch Bay Watershed and Aquatic Resources Management District (BBWARM), Flood fund, and Federal Emergency Management Agency (FEMA) funds.

Table 16. Stormwater Projects

No.	Project Name	Funding	2025	2026	2027	2028	2029	2030	2031	Totals
1	Geneva Bioretention Pilot Project	1,3	45,000	-	-	-	-	-	-	45,000
2	Eagleridge Stormwater Improvements	1,3	500,000	-	-	-	-	-	-	500,000
3	Austin Court Stormwater Improvements	1,3	-	450,000	-	-	-	-	-	450,000
4	Cedar Hills	1,3	205,000	-	-	-	-	-	-	205,000
5	Strawberry Point/Lake Whatcom Blvd Stormwater Improvements	1,3	30,000	335,000	805,000	-	-	-	-	1,170,000
6	Geneva St and Lake Louise Culvert Replacement	1,3	-	-	70,000	200,000	-	-	-	270,000
7	Lake Whatcom Blvd Media Filter Drain	1,3	-	-	205,000	-	630,000	-	-	835,000
8	Sudden Valley Stormwater Improvements 2	1,3	-	10,000	-	210,000	-	1,040,000	-	1,260,000
9	Lake Whatcom Blvd Water Quality Vault	1,3	-	-	-	-	225,000	-	800,000	1,025,000
10	Viewhaven Lane Water Quality & Conveyance Improvements	3	-	-	-	-	115,000	100,000	-	215,000
11	Charel Terrace Stormwater Outfall Repair - Temporary and Perma	3	520,000	-	-	-	-	-	-	520,000
12	Semiahmoo Drive South and Outfall Improvements	3	985,000	-	-	-	-	-	-	985,000
13	Nomar Place Stormwater Improvements	1,3	-	860,000	-	-	-	-	-	860,000
14	Lora Lane Drainage and Tide Gate Modifications	1,3	1,430,000	-	-	-	-	-	-	1,430,000
15	Birch Point Road & Outfall Improvements	1,3	320,000	-	650,000	-	-	-	-	970,000
16	Richmond Park Stormwater Improvements	1,3	-	700,000	-	1,900,000	-	-	-	2,600,000
17	Roger's Slough Drainage Improvements	1,3	-	-	750,000	-	2,100,000	-	-	2,850,000
18	Birch Bay Village Stormwater Improvements	1,3	-	-	-	350,000	-	910,000	-	1,260,000
19	Bay Ridge Estates Stormwater Improvements	1,3	-	-	-	-	220,000	-	550,000	770,000
			4,035,000	2,355,000	2,480,000	2,660,000	3,290,000	2,050,000	1,350,000	18,220,000
	Funding Sources									
1	Reet II									
2	EDI									
3	Other Sources (Grants, Special Revenue Funds, Donations)									
4										

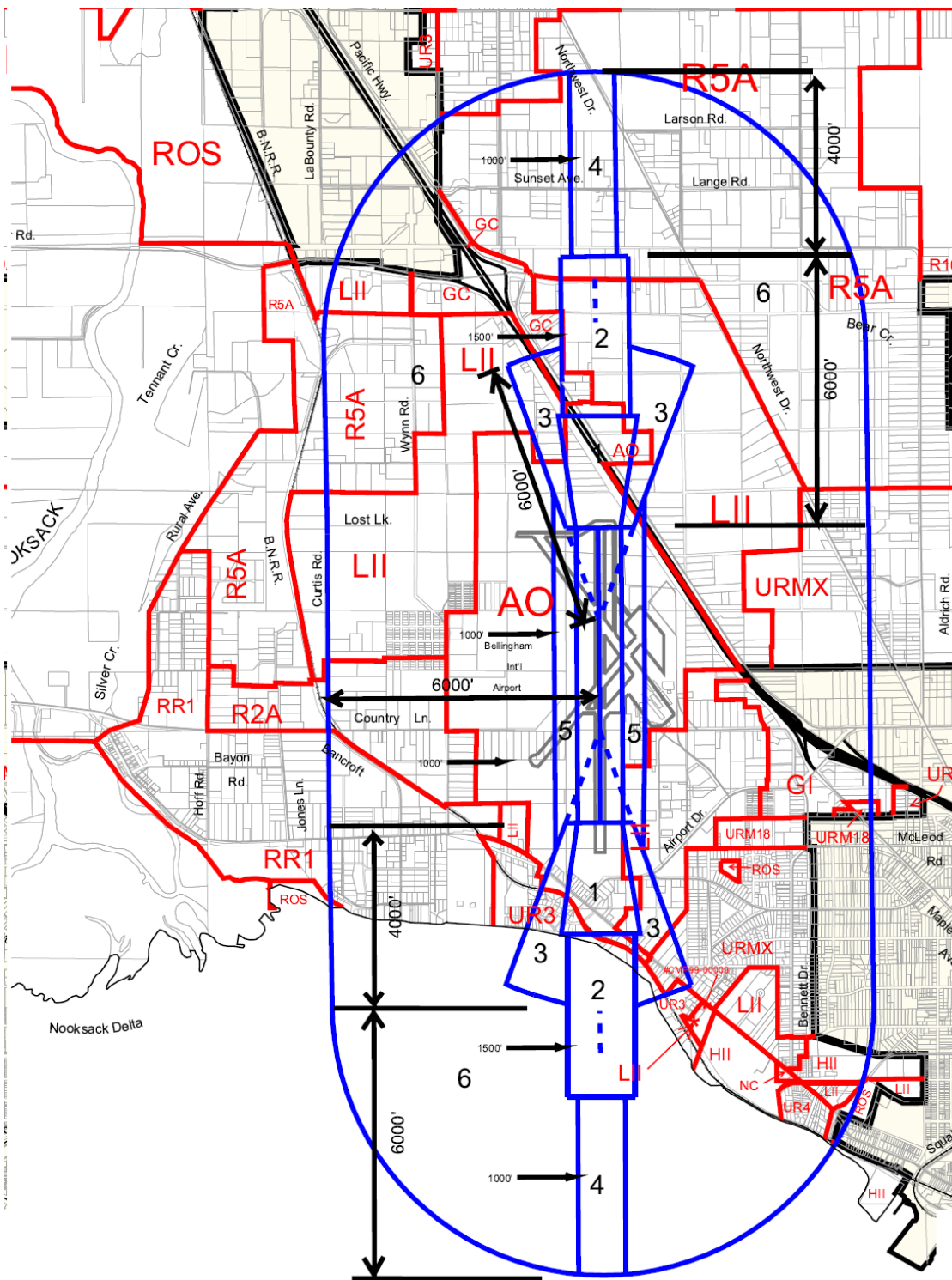
Chapter 11 – Total Costs

Total Costs for the seven-year planning period are shown below.

Table 17. Total Costs for the Seven-Year Planning Period

	Total Costs 2025-2031	Percent of Total Costs
Parks, Trails, and Activity Centers	49,210,712	10.95%
Maintenance and Operations	3,740,000	0.83%
General Government Buildings and Sites	57,689,024	12.84%
Sheriff's Office	12,047,315	2.68%
Emergency Management	0	0.00%
Adult Corrections	178,009,661	39.61%
Juvenile Detention	0	0.00%
Transportation	130,500,000	29.04%
Stormwater Facilities	18,220,000	4.05%
TOTAL	<u>449,416,712</u>	100.00%

The County plans to undertake capital improvement projects costing over \$449 million between 2025 and 2031, which will be financed with a combination of local, state, federal, and other funding sources.

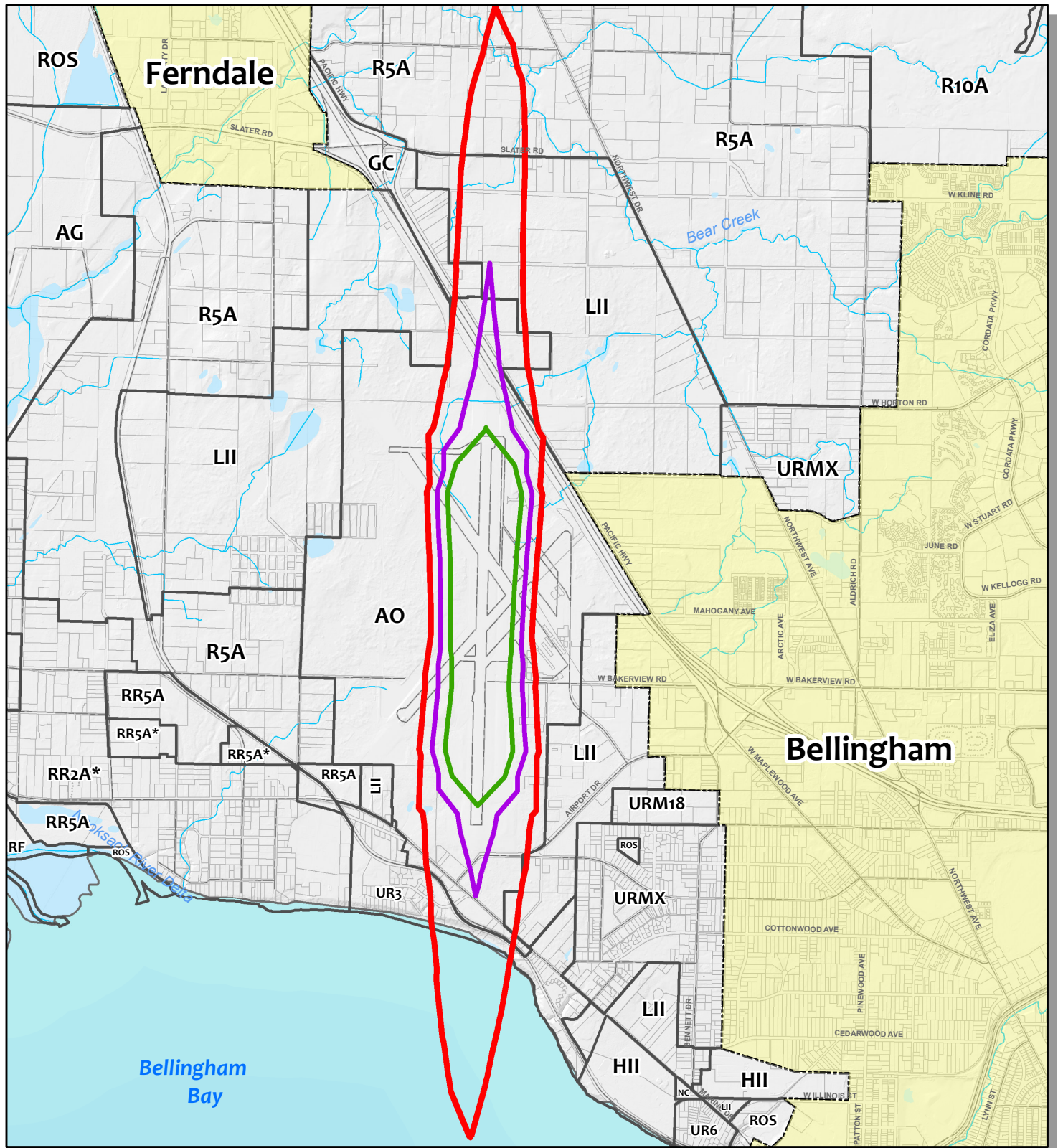


- Bellingham Int. Airport Overlay Zones

- Airport Overlay Zones
- Zoning Designations
- Incorporated City

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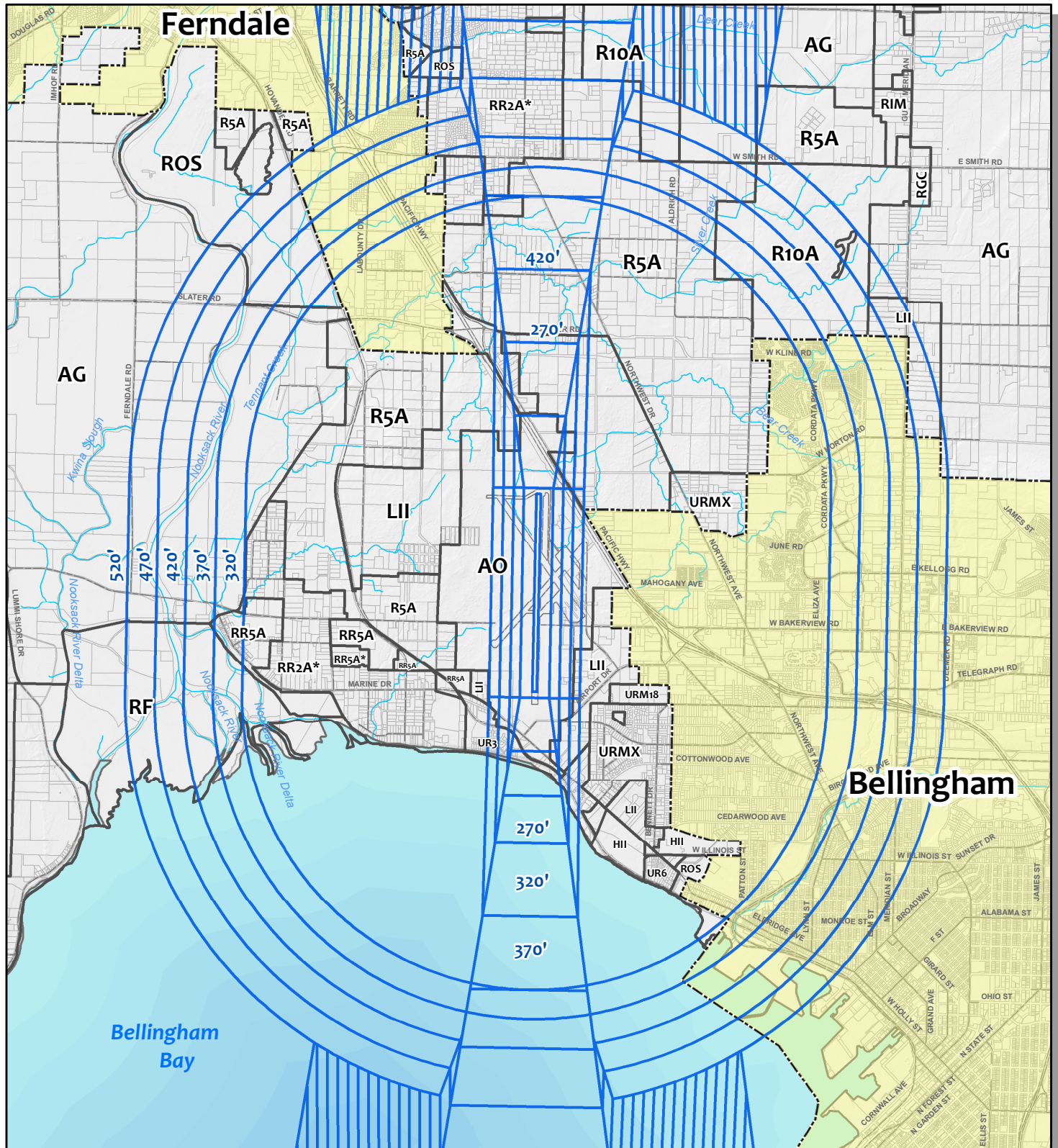
- Bellingham Int. Airport Overlay Zones

- 2037 Noise Contour (65 DNL)
- 2037 Noise Contour (70 DNL)
- 2037 Noise Contour (75 DNL)
- Incorporated City
- Zoning Designations

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 Miles





- Bellingham Int. Airport Imaginary Surfaces

-  FAR Part 77 Imaginary Surfaces
-  Incorporated City
-  Zoning Designations

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Appendix I
Housing Needs Analysis



Whatcom County

Housing Needs Analysis

Prepared by: Leland Consulting Group

June 9, 2026

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Introduction

This Housing Needs Assessment (HNA) was prepared as part of the background analysis for updating the Housing Chapter of the Whatcom County Comprehensive Plan. As required by RCW 36.70A.070(2), jurisdictions planning under the Growth Management Act (GMA) must include a Housing Element in their comprehensive plan, which identifies current and future housing needs to serve all economic segments of the community and analyzes potential gaps in housing supply, type, and affordability.

This report includes a description of population and household characteristics, a profile of the local workforce, employment projections, an inventory of the housing supply, an overview of local housing market conditions, and gap and land capacity analyses.

This HNA fulfills the requirements of the GMA Housing Element checklist produced by the Washington Department of Commerce. Further information on this checklist can be found in Appendix A.

Key Takeaways

- **Whatcom County's population has been growing at a faster rate than the Puget Sound region** (1.3 percent vs. 1.1 percent average annual growth since 2020). Just under 41 percent of county residents live in Bellingham, while 40 percent live in unincorporated areas. Since 1991, the year with the highest net migration into the county was 2021-2022.
- **The population of Whatcom County is slightly older than the statewide population and there is a higher share of residents identifying as white alone** (not Hispanic or Latino). However, Everson's population is 30 percent Hispanic or Latino – triple the countywide share.
- In Whatcom County, 13 percent of residents are below the federal poverty level compared to 10 percent statewide. Peaceful Valley has the highest share of residents below the poverty level at 27.5 percent while Lynden has the lowest at 7.1 percent. **The high share of residents living below the federal poverty line indicates a need for affordable housing countywide.**
- **Roughly 11,700 Whatcom County residents have an ambulatory disability, indicating a potential need for more accessible units.** Birch Bay has the highest share of residents with a disability (18 percent) while Kendall has the lowest (six percent). Peaceful Valley has the highest share of residents with an ambulatory disability (12 percent).
- In Whatcom County, 63 percent of housing units are owner-occupied compared to 61 percent in the Puget Sound and 64 percent statewide. Nooksack has the highest share of owner-occupied households of Whatcom County cities (87 percent) while Bellingham has the lowest (46 percent). **As home prices rise, there may be a need for more rental housing, especially in population centers like Bellingham and Ferndale.**
- **The typical household in Whatcom County has 2.48 residents, below the statewide average of 2.58.** This is largely driven by the small household sizes in Bellingham (2.28 people per household), where students make up a significant share of the population. Kendall has the largest households, with an average of 3.35 residents. Over two thirds of housing units countywide have two to three bedrooms. **While the county has a low rate of overcrowding (1.3**

percent), 3.8 percent of Ferndale households and 4.5 percent of Peaceful Valley households have more than 1.5 people per bedroom.

- In Whatcom County, 47 percent of households make more than the area median income (AMI) while 12 percent make less than 30 percent of AMI. **Kendall and Peaceful Valley have the lowest share of residents making more than the median (19 and 26 percent, respectively) and the highest share of residents making less than 30 percent of AMI (35 and 30 percent, respectively).** Despite this, half of households in Kendall and two thirds of households in Peaceful Valley own their homes. In Kendall, 49 percent of households are cost burdened, with 41 percent spending more than half of their incomes on housing. **This indicates a potential need for programs aimed at supporting low-income and cost-burdened homeowners as well as renters.**
- According to the Department of Commerce, households south of Everson and in the area that includes Kendall and Peaceful Valley are at a higher risk of displacement than other unincorporated areas. In addition, Ferndale and Bellingham have areas with high displacement risks, while the west side of Lynden is already experiencing demographic and market change. **The County and local jurisdictions should consider enacting policies to help residents of these areas remain housed in their communities.**
- **Whatcom County is expected to add 36,013 housing units and 67,638 residents between 2023 and 2045.** Over half of the new housing units are expected to be in Bellingham (including both the city and UGA) while nearly 13 percent are expected to be located in Ferndale.
- **Bellingham is the major job center in Whatcom County and is home to over half of the jobs countywide as of 2023.** Healthcare and social assistance is the largest job sector countywide and healthcare practitioners have the highest mean hourly wage among top-sector occupations (\$54.09). However, healthcare support occupations typically pay less than the metro area mean at \$19.55 per hour.
- **As the County's major job center, Bellingham has a jobs to housing ratio of 1.2, the highest countywide.** Ferndale and Lynden also have more jobs than housing units, while Nooksack has nearly twice as many homes as jobs. Countywide, the jobs to housing ratio is 0.85.
- **Countywide, the dominant housing type is single family (attached or detached) homes.** However, 20 percent of homes in Bellingham are in structures with at least 20 units, and nearly half of the housing units in Peaceful Valley and Kendall are mobile homes. Between 2003 and 2023, most of the housing permitted countywide was in single-family homes. However, 7,685 homes in structures with at least five units were permitted in Bellingham over that period.
- Home prices rose significantly between 2004 and 2024, with the typical home price in the county reaching \$600,447 in 2024. Sumas and Everson have the lowest typical home prices in the county while Bellingham has the highest. **As home price increases continue to outpace wages, the risks of cost burden and displacement are likely to grow.**

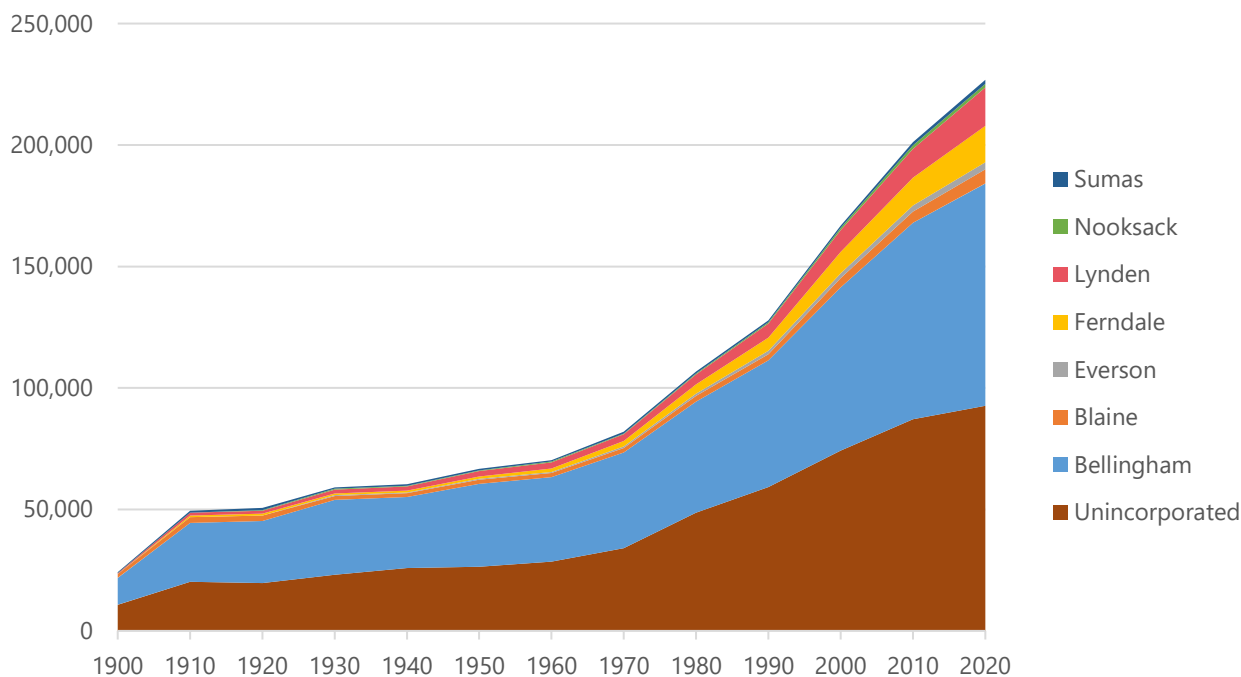
Community Profile

Population Characteristics

According to the Washington Office of Financial Management, as of 2023 there are an estimated 235,800 residents in Whatcom County. This represents an increase of nearly 9,000 residents since the 2020 Census (nearly four percent growth over three years, or 1.3 percent average annual growth). Over the same period, the Puget Sound region’s population grew by just over three percent (1.1 percent average annual growth).

Historically, most of the population growth in Whatcom County has been concentrated in Bellingham and unincorporated areas (which include urban growth areas outside city limits and rural lands). As of 2023, just 19 percent of the population lived in the other cities in the County, including Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas.

Figure 1. Historic Population Growth in Whatcom County, 1900-2020



Source: US Census Bureau Decennial Census via Washington Office of Financial Management (OFM).

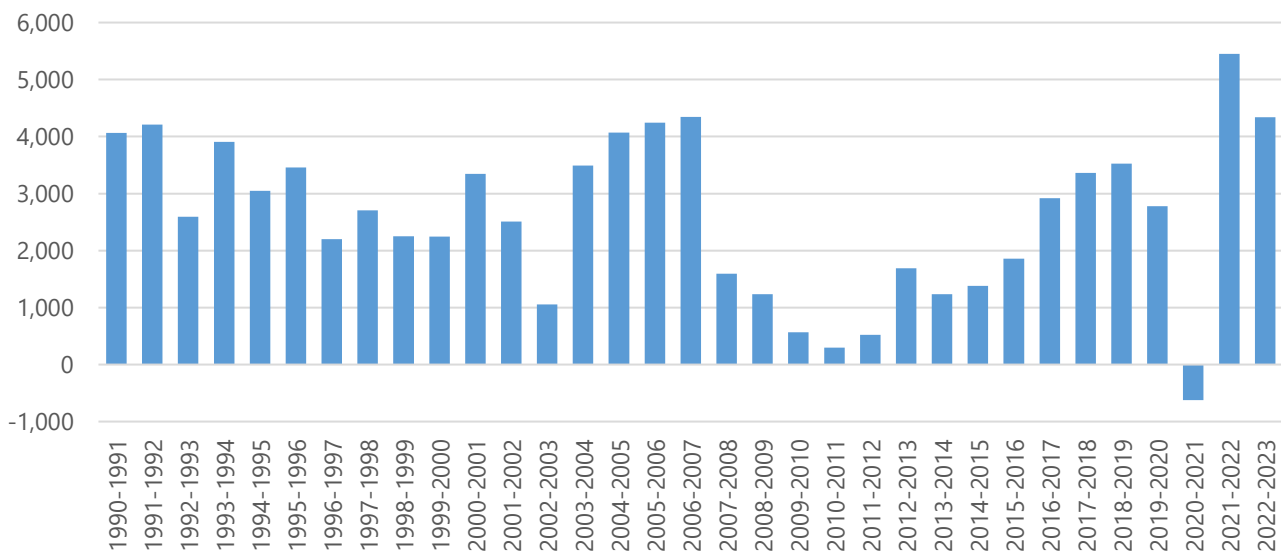
Figure 2. Whatcom County Population by City, 2010-2023

	2010	2020	2023
Bellingham	80,885	91,482	95,960
Blaine	4,684	5,884	6,310
Everson	2,483	2,888	3,135
Ferndale	11,415	15,048	16,330
Lynden	11,951	15,749	16,520
Nooksack	1,338	1,471	1,560
Sumas	1,319	1,665	1,810
Unincorporated	87,065	92,660	94,175
Total	201,140	226,847	235,800

Source: Washington Office of Financial Management (OFM).

Net migration into Whatcom County peaked in 2021-2022, when a net total of 5,488 new residents moved to the county. The 2020-2021 period during the peak of the COVID-19 pandemic was the only instance of negative net migration over the past thirty years. Net migration into the county also slowed during the Great Recession, from 2007 to 2012.

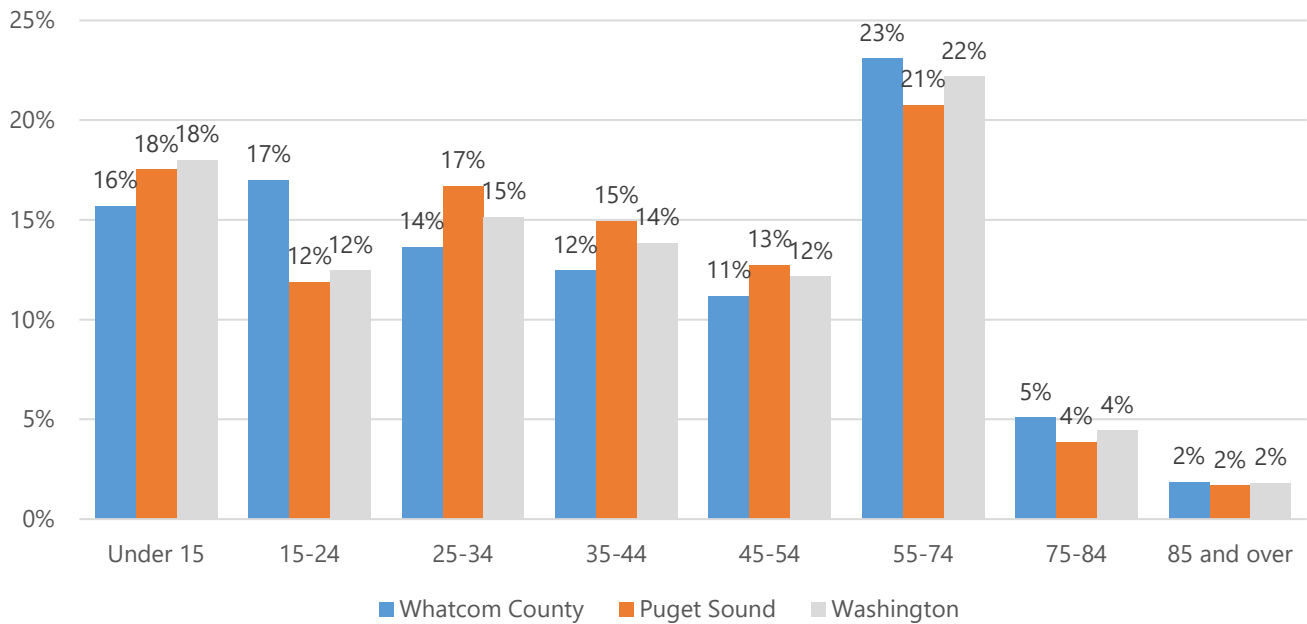
Figure 3. Net Migration in Whatcom County, 1990-2023



Source: Washington Office of Financial Management (OFM).

As shown in Figure 4 below, the population of Whatcom County is slightly older than the four-county Puget Sound region (Snohomish, Pierce, King, and Kitsap Counties). While 30 percent of Whatcom County residents are 55 years or older, 26 percent of Puget Sound residents are within that age range. Whatcom County also has a slightly higher share of residents under the age of 25 (33 percent).

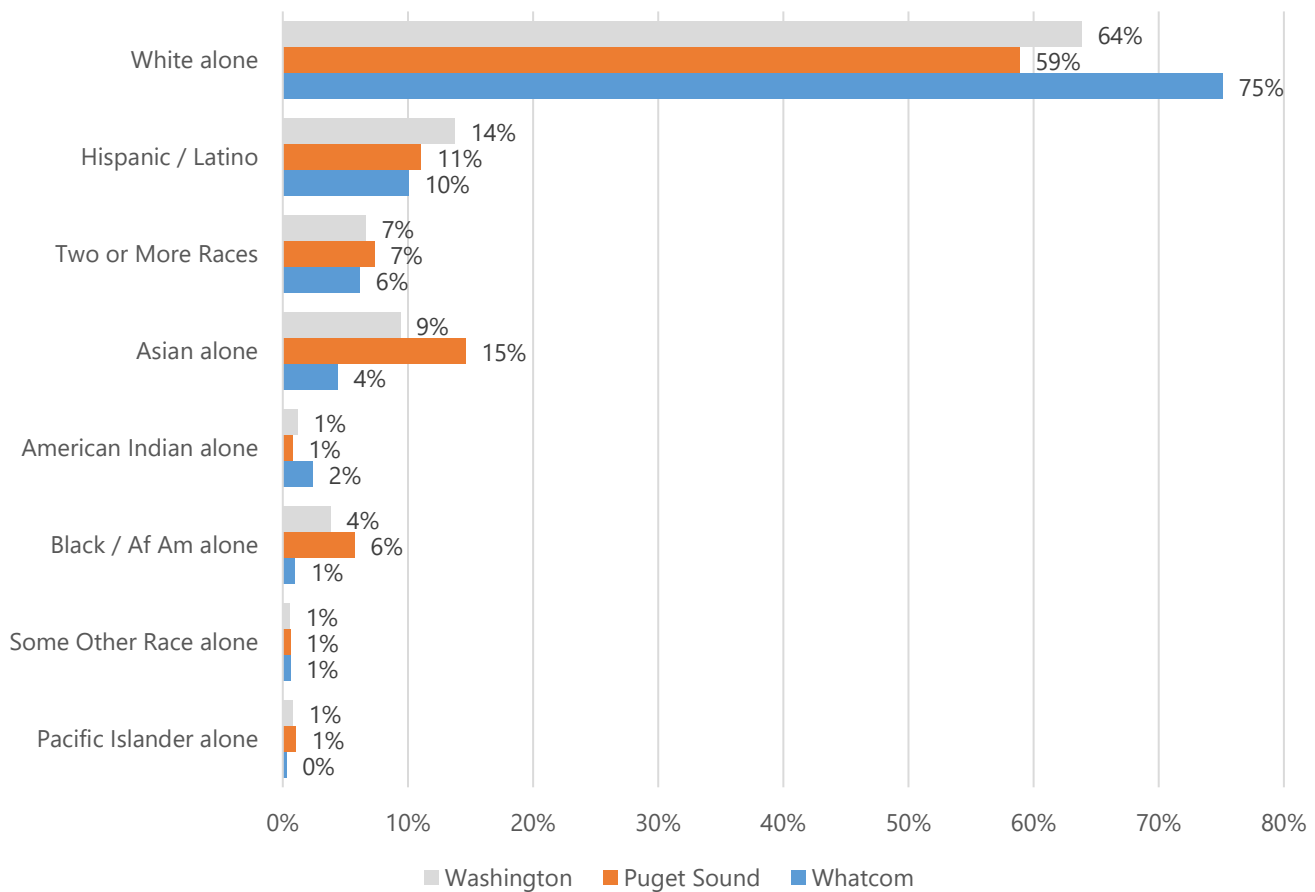
Figure 4. Age Distribution in Whatcom County and the Puget Sound Region, 2022



Source: US Census Bureau 2022 5-Year ACS, Table S0101.

Overall, Whatcom County is less diverse than the Puget Sound region, as Whatcom County has a higher share of white (non-Hispanic) residents than the Puget Sound area. Just four percent of Whatcom County residents are Asian, compared with 15 percent of Puget Sound residents. There are slightly over 2,200 Black or African American (non-Hispanic) residents in Whatcom County, making up just one percent of the population, compared with six percent in the Puget Sound region and four percent statewide.

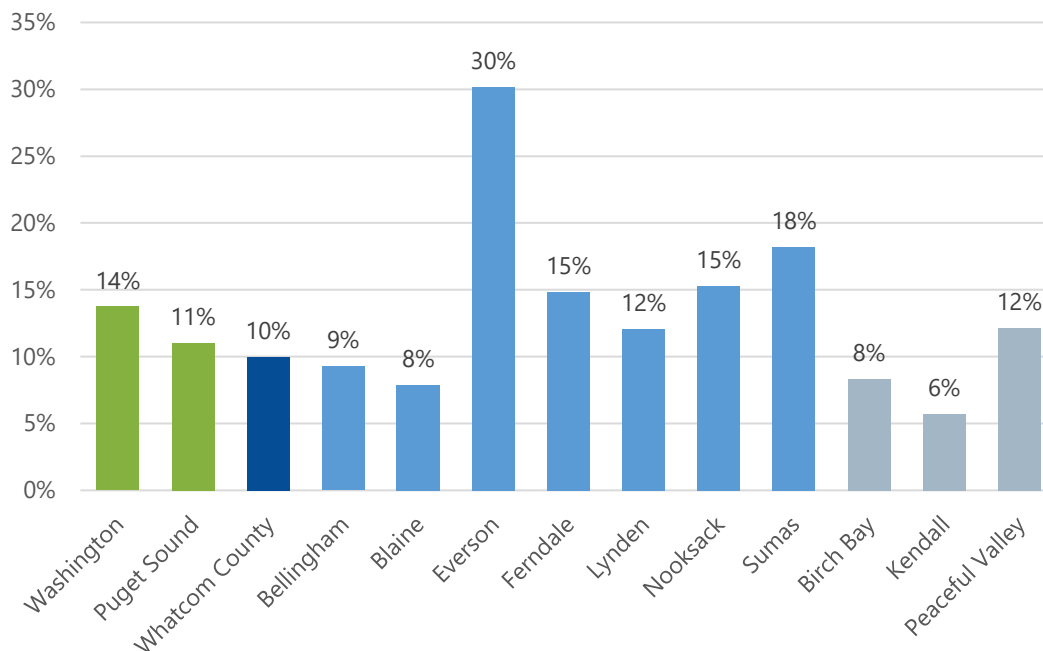
Figure 5. Race and Ethnicity in Whatcom County and the Puget Sound Region, 2020



Source: US Census Bureau 2020 Decennial Census, Table P9.

Ten percent of Whatcom County residents are Hispanic or Latino, compared with 14 percent statewide. The city with the highest share of Hispanic or Latino residents is Everson, where nearly one third of the population is Hispanic or Latino. Ferndale, Nooksack, and Sumas also have relatively high shares of Hispanic or Latino residents. While Bellingham is the largest city in the County with over 91,000 residents, just 8,500 Bellingham residents are Hispanic or Latino (nine percent).

Figure 6. Share of Residents of Any Race Who Are Hispanic or Latino, 2020



Source: US Census Bureau 2020 Decennial Census, Table P9.

Note: Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas refer to the areas within each city boundary. Birch Bay, Kendall, and Peaceful Valley are Census Designated Places (CDPs).

The most common language spoken at home other than English in Whatcom County is Spanish, followed by other Indo-European languages. Roughly 22 percent of Whatcom County residents speak a language other than English in their homes, compared with 24 percent across the Puget Sound region. Since 2010, the share of Whatcom County residents who speak a language other than English has grown slightly as the share of Spanish speakers has increased.

Figure 7. Languages Spoken at Home in Whatcom County, 2022

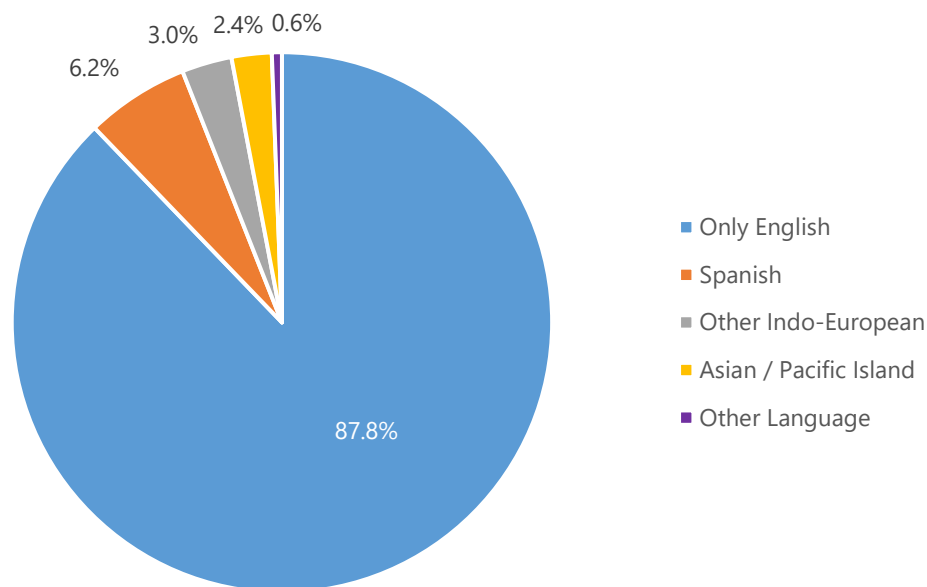


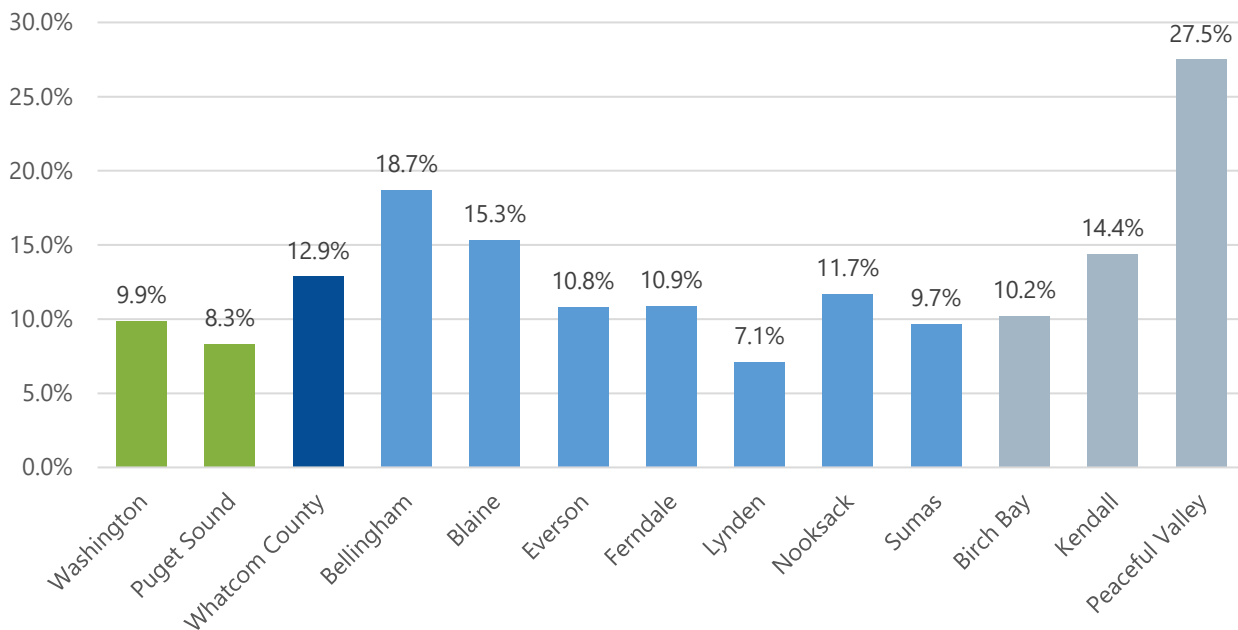
Figure 8. Languages Spoken at Home in Whatcom County, 2010-2022

	2010	2020	2022
Only English	88.6%	88.1%	87.8%
Spanish	4.9%	6.1%	6.2%
Other Indo-European	3.9%	3.0%	3.0%
Asian / Pacific Island	2.1%	2.4%	2.4%
Other Language	0.5%	0.4%	0.6%

Source: US Census Bureau 5-Year ACS, Table S1601.

Whatcom County has a higher share of residents living below the federal poverty level than Washington or the Puget Sound region. The Peaceful Valley CDP and city of Bellingham have the highest share of residents living in poverty, while Lynden has the lowest. However, nearly half (46 percent) of those living below the poverty level in Bellingham are between the ages of 18 and 24 years old, indicating that the poverty level in the city may be impacted by the high share of college students.

Figure 9. Percent of Residents Below the Federal Poverty Line, 2022



Source: US Census 2022 5-Year ACS, Table S1701.

Note: Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas refer to the areas within each city boundary. Birch Bay, Kendall, and Peaceful Valley are Census Designated Places (CDPs).

Among the Whatcom County civilian, non-institutionalized population, 13 percent (29,000 residents) have some type of disability. This is in line with state averages. Peaceful Valley and Birch Bay have the highest share of disabled residents, 22 and 18 percent, respectively. Roughly 11,700 Whatcom County residents have an ambulatory disability, indicating that there may be a need for more accessible housing, especially as the population ages.

Figure 10. Disability by Type among Total Civilian, Non-Institutionalized Population, 2022

	Washington	Puget Sound	Whatcom County	Bellingham	Blaine	Everson
Total Population	7,571,532	4,211,035	224,896	90,152	5,814	2,960
With a Disability	985,655	478,046	29,056	11,259	954	449
Hearing	292,556	132,358	8,709	2,893	274	131
Vision	167,270	79,013	4,707	1,625	229	77
Cognitive	402,321	199,620	13,410	5,519	472	221
Ambulatory	450,435	217,239	11,698	4,870	335	230
Self-Care	177,963	87,653	4,880	1,790	132	85
Independent Living	340,507	170,519	9,852	4,102	244	172

	Ferndale	Lynden	Nooksack	Sumas	Birch Bay	Kendall	Peaceful Valley
Total Population	15,075	15,580	1,564	1,397	11,048	959	2,715
With a Disability	1,820	1,923	195	199	1,986	55	600
Hearing	385	733	67	67	624	-	106
Vision	282	299	48	23	384	-	114
Cognitive	1,019	796	38	38	1,112	29	339
Ambulatory	509	730	66	140	787	44	328
Self-Care	174	469	29	43	278	-	126
Independent Living	787	679	58	60	752	11	107

	Washington	Puget Sound	Whatcom County	Bellingham	Blaine	Everson
With a Disability	13%	11%	13%	12%	16%	15%
Hearing	4%	3%	4%	3%	5%	4%
Vision	2%	2%	2%	2%	4%	3%
Cognitive	5%	5%	6%	6%	8%	7%
Ambulatory	6%	5%	5%	5%	6%	8%
Self-Care	2%	2%	2%	2%	2%	3%
Independent Living	4%	4%	4%	5%	4%	6%

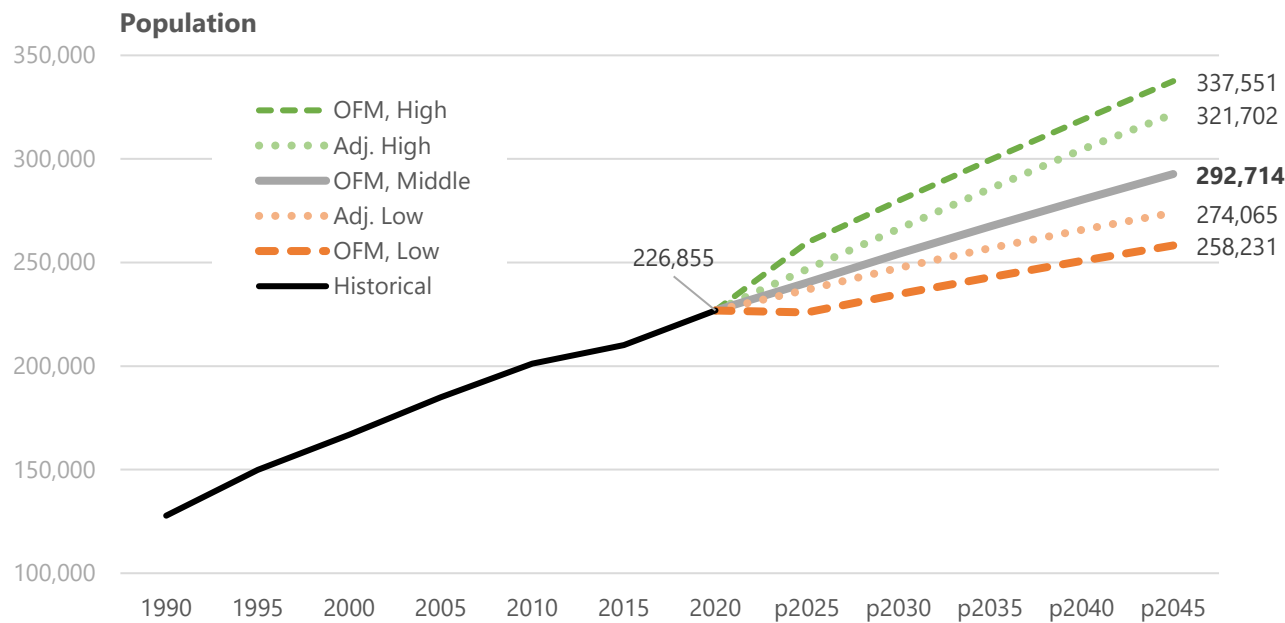
	Ferndale	Lynden	Nooksack	Sumas	Birch Bay	Kendall	Peaceful Valley
With a Disability	12%	12%	12%	14%	18%	6%	22%
Hearing	3%	5%	4%	5%	6%	0%	4%
Vision	2%	2%	3%	2%	3%	0%	4%
Cognitive	7%	5%	2%	3%	10%	3%	12%
Ambulatory	3%	5%	4%	10%	7%	5%	12%
Self-Care	1%	3%	2%	3%	3%	0%	5%
Independent Living	5%	4%	4%	4%	7%	1%	4%

Source: US Census 2022 5-Year ACS, Table S1810.

Note: Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas refer to the areas within each city boundary. Birch Bay, Kendall, and Peaceful Valley are Census Designated Places (CDPs).

As shown below in Figure 5, under OFM’s middle forecast, Whatcom County would increase in population by 2045 to 292,714. The chart below shows the County’s adjusted low and high population projections as well as the low and high population ranges forecast by OFM. Full details of the population forecasts can be found in the “Population and Employment: Growth Projections and Preliminary Allocations Technical Report” (May 22, 2024).

Figure 11: Revised Population Forecast Ranges, Whatcom County, 2020-2045



Source: OFM - Forecasting & Research, December 2022; and Leland Consulting Group

Figure 12 below shows the preliminary growth targets for population and housing units for the 2023-2045 period (Resolution 2025-011 approved by the Whatcom County Council on March 11, 2025, and subsequently modified by County Council in March 2026 for Rural and Resource Lands, Birch Bay UGA, and Columbia Valley UGA).

Figure 12: Population and Housing Growth Targets 2023-2045

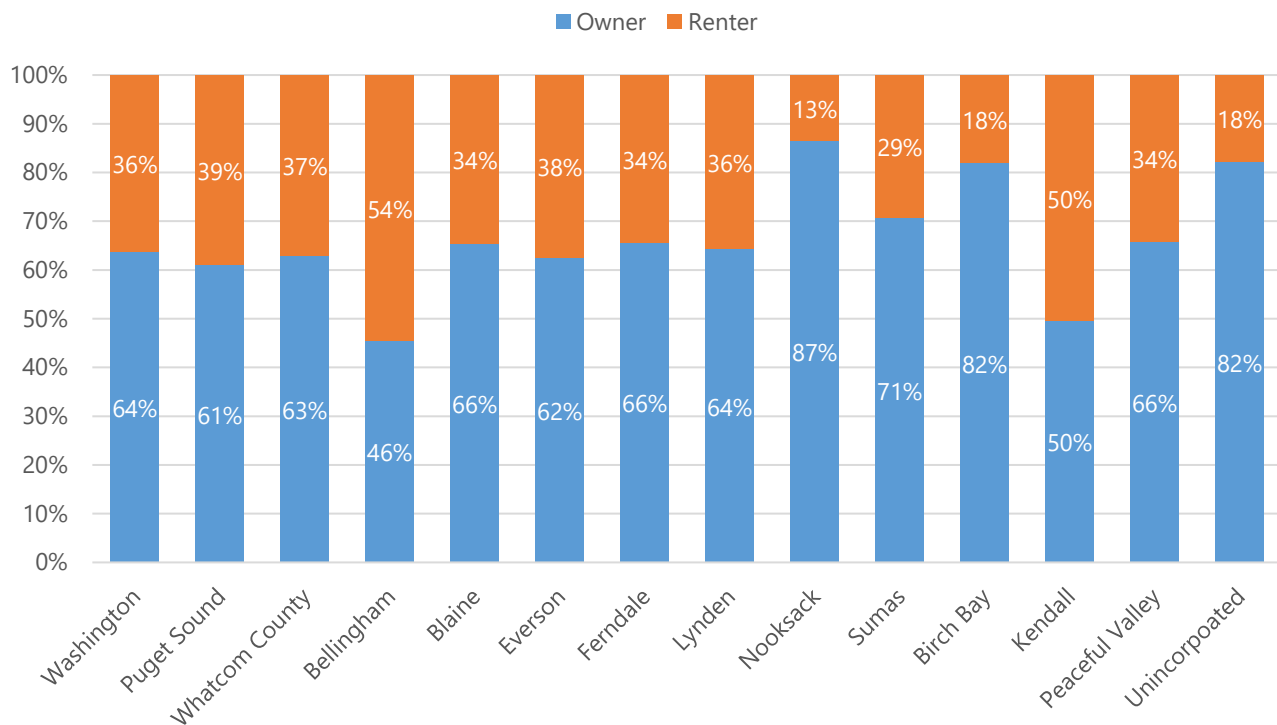
	Population	Population Share	Housing Units	Housing Unit Share
Bellingham City & UGA	30,310	46.0%	18,390	52.2%
Birch Bay UGA	2,662	4.0%	981	2.8%
Blaine City & UGA	3,500	5.3%	1,774	5.0%
Cherry Point UGA	0	0.0%	0	0.0%
Columbia Valley UGA	1,137	1.7%	433	1.2%
Everson City & UGA	1,408	2.1%	610	1.7%
Ferndale City & UGA	10,961	16.6%	4,659	13.2%
Lynden City & UGA	6,665	10.1%	3,535	10.0%
Nooksack City & UGA	995	1.5%	433	1.2%
Sumas City & UGA	1,000	1.5%	643	1.8%
Rural and Resource Lands	7,243	11.0%	3,771	10.7%
Total	65,881	100.0%	35,229	100.0%

Source: Whatcom County Non-Binding Multi-Jurisdictional Resolution No. 2025-011, Adopted March 11, 2025, subsequently modified by County Council in March 2026 for Rural and Resource Lands, Birch Bay UGA, and Columbia Valley UGA.

Household Characteristics

Whatcom County has 91,171 occupied housing units, according to the 2022 American Community Survey 5-year estimates. Of these, 63 percent are owner-occupied while 37 percent are renter-occupied. This is similar to statewide trends. Bellingham has the highest share of renter-occupied housing units (54 percent) while Nooksack has the lowest share (13 percent) countywide.

Figure 13. Share of Owner- and Renter-Occupied Housing Units, 2022

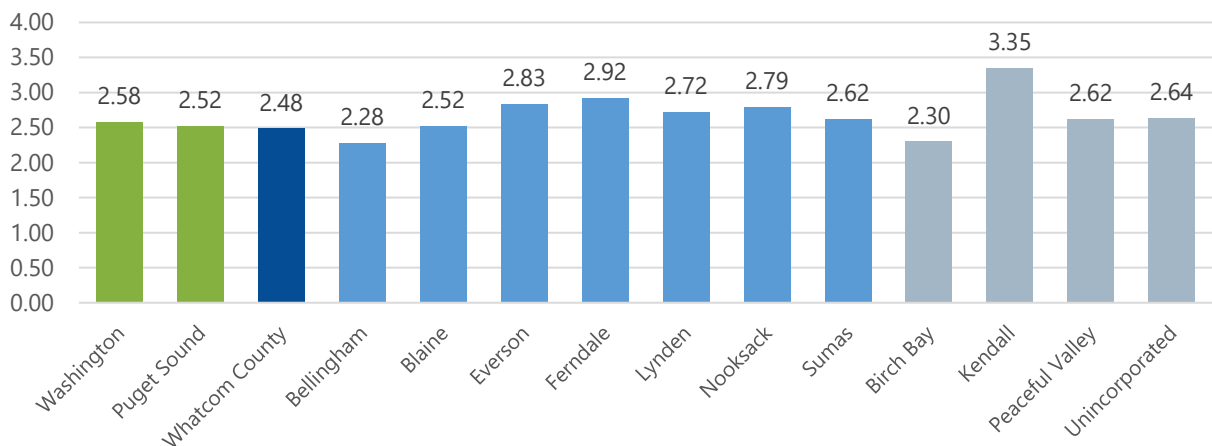


Source: US Census 2022 5-Year ACS, Table S2501.

Note: Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas refer to the areas within each city boundary. Birch Bay, Kendall, and Peaceful Valley are Census Designated Places (CDPs). Unincorporated includes the areas outside of city limits, excluding the Birch Bay, Kendall, and Peaceful Valley CDPs.

Whatcom County has an average of 2.48 people per household, below the statewide average of 2.58. This is largely driven by the relatively small average household size in Bellingham (2.28 people per household), which also correlates with the larger share of renters in Bellingham shown above. The Kendall CDP has the highest number of people per household in the county at 3.35.

Figure 14. Average People per Household in Whatcom County, 2022

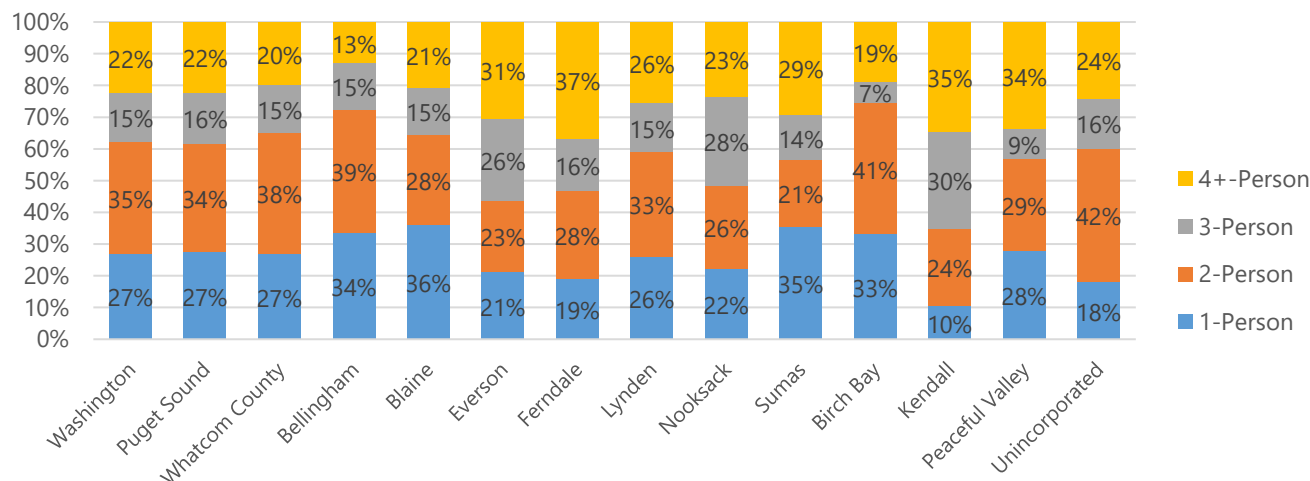


Source: US Census 2022 5-Year ACS, Tables S2501, DP05.

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In Whatcom County, Washington, and the Puget Sound region, 27 percent of households have just one person. Within Whatcom County, Blaine has the highest share of one-person households (36 percent) while the Kendal CDP has the lowest (ten percent). Nearly two thirds of Whatcom County households have one or two residents, indicating a high need for smaller housing units. Just one fifth of Whatcom County households have four or more residents.

Figure 15. Households by Number of Residents, 2022

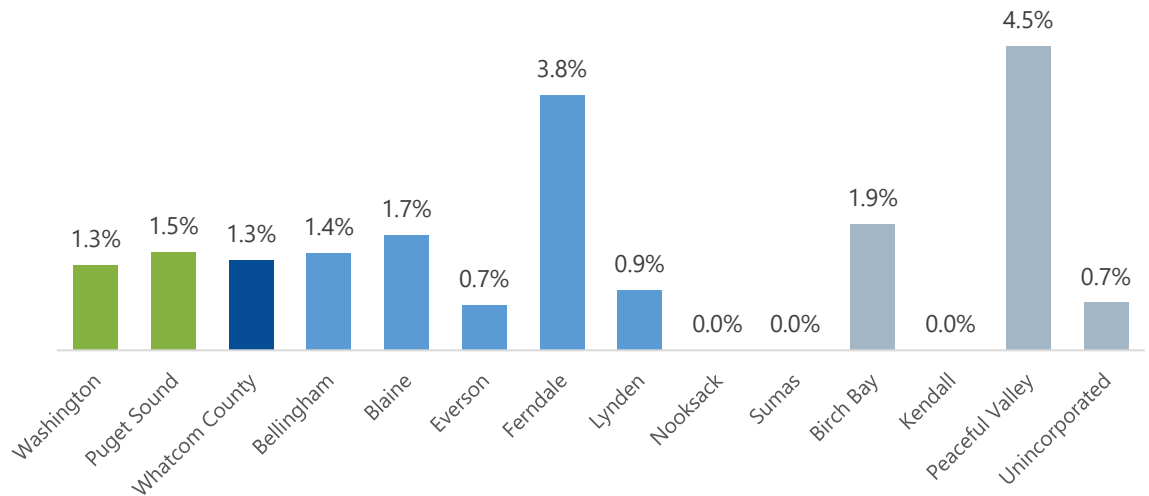


Source: US Census 2022 5-Year ACS, Tables S2501, DP05.

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The Puget Sound Regional Council defines overcrowded households as those where there are more than 1.5 people per bedroom. In Whatcom County, 1.3 percent of households are overcrowded. Peaceful Valley has the highest share of overcrowded households at 4.5 percent, while Nooksack, Sumas, and Kendall do not have any overcrowded households. According to the US Census Bureau, 579 households in Bellingham (1.4 percent) and 197 households in Ferndale (3.8 percent) have more than 1.5 people per bedroom. This suggests a need for more family-sized housing in these cities.

Figure 16. Rates of Overcrowding, Whatcom County, 2022

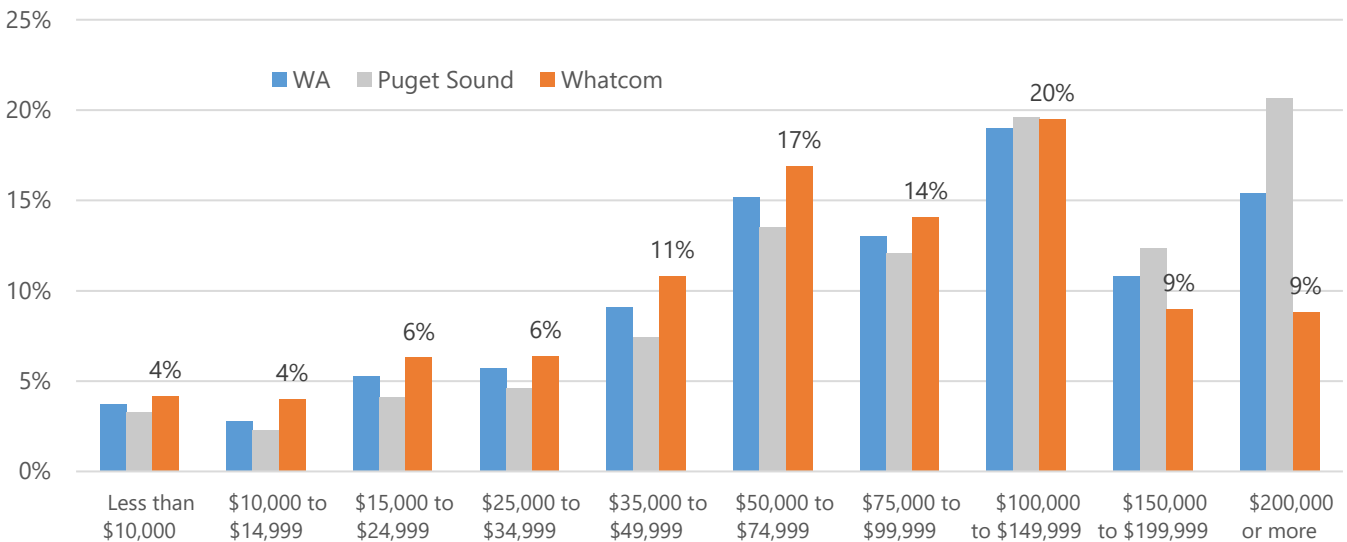


Source: US Census 2022 5-Year ACS, Tables S2501, DP05.

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The median household income in Whatcom County is \$77,581, compared with \$107,565 in the Puget Sound region and \$90,325 statewide. Nearly one third of households in Whatcom County make less than \$50,000 annually, compared with 27 percent statewide.

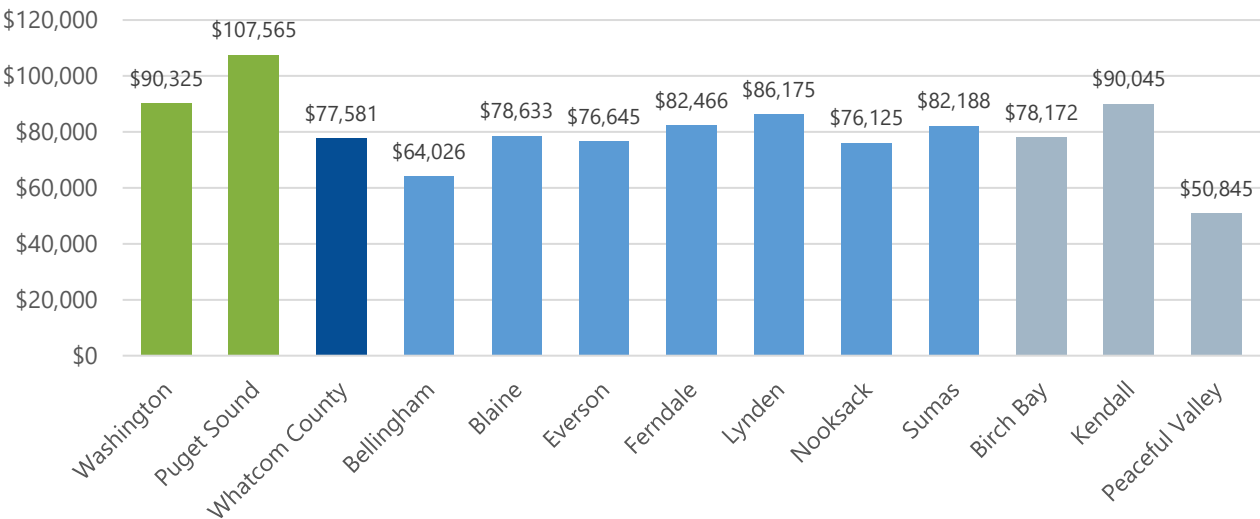
Figure 17. Household Income Distribution, Whatcom County, 2022



Source: US Census 2022 5-Year ACS, Table S1901.

Within Whatcom County, the Kendall CDP and Lynden have the highest median incomes. The Peaceful Valley CDP has the lowest median household income at \$50,845.

Figure 18. Median Household Income, Whatcom County, 2022



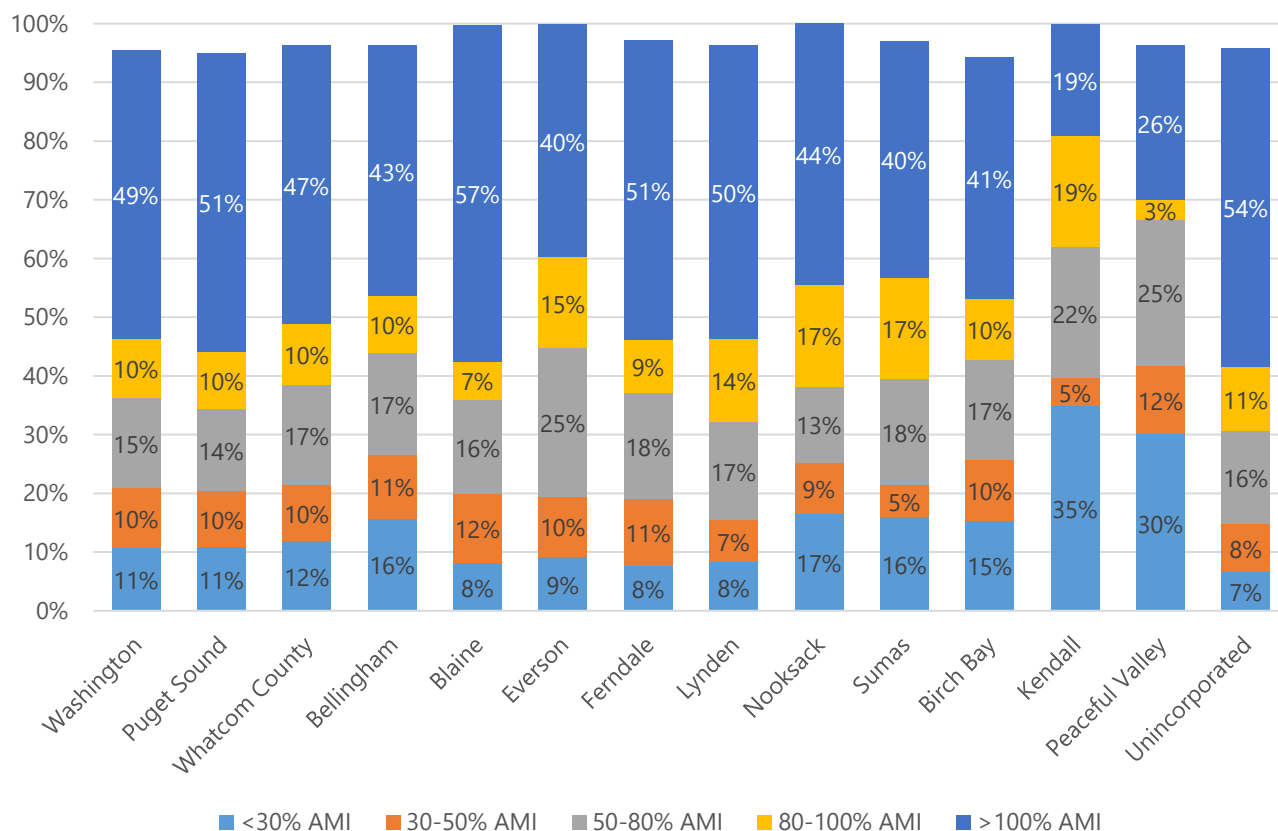
Source: US Census 2022 5-Year ACS, Table S1901.

Note: Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas refer to the areas within each city boundary. Birch Bay, Kendall, and Peaceful Valley are Census Designated Places (CDPs).

In Whatcom County, 47 percent of households make more than 100 percent of Area Median Income (AMI), compared with 49 percent statewide. More than half of households in unincorporated Whatcom

County make above the AMI while 45 percent make less than 80 percent AMI. Kendall has the highest share of households making below 30 percent AMI of any jurisdiction countywide (35 percent).

Figure 19. Households by Income Band, Whatcom County, 2021

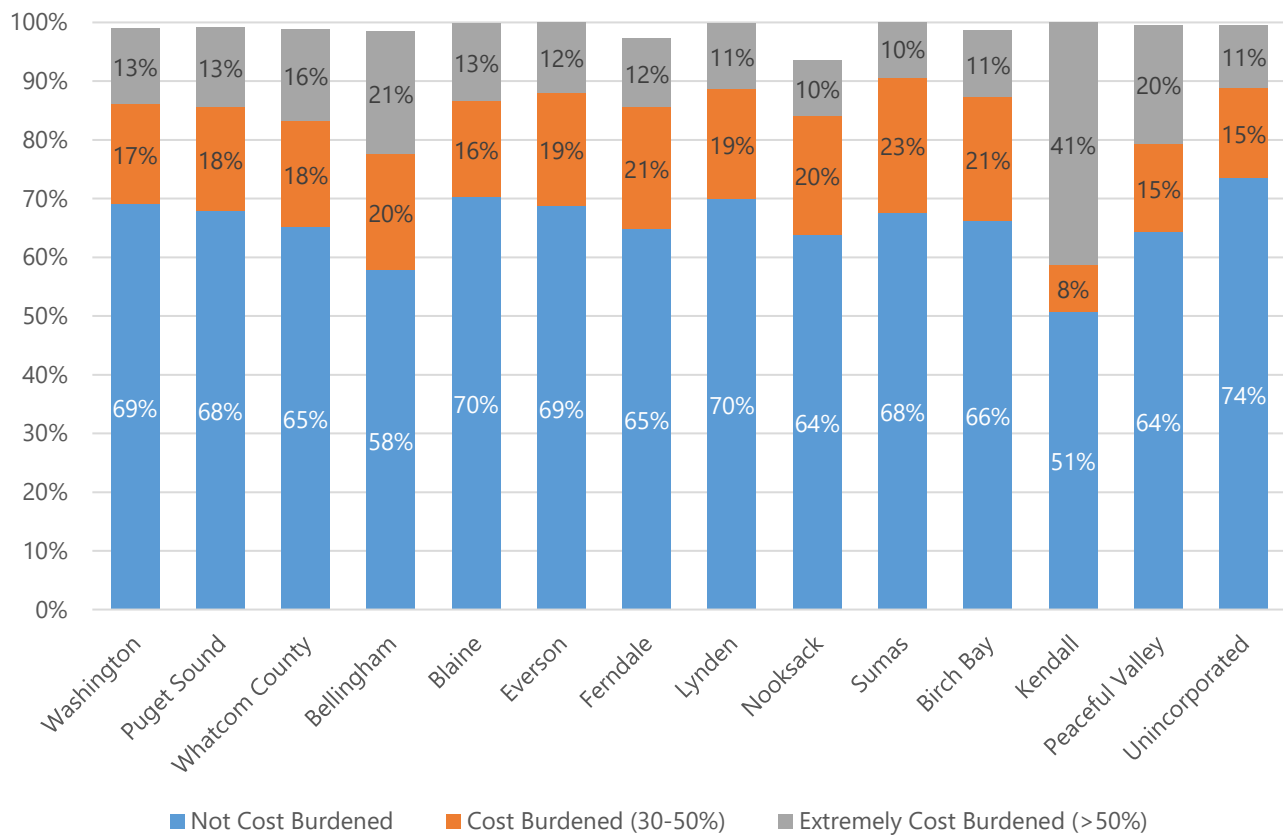


Source: US Department of Housing and Urban Development 2017-2021 Comprehensive Housing Affordability Strategy (CHAS).

Note: Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas refer to the areas within each city boundary. Birch Bay, Kendall, and Peaceful Valley are Census Designated Places (CDPs). Unincorporated includes the areas outside of city limits, excluding the Birch Bay, Kendall, and Peaceful Valley CDPs.

The US Department of Housing and Urban Development defines cost burdened households as those spending more than 30 percent of their income on housing costs. Extremely cost burdened households spend more than 50 percent of their income on housing costs. Whatcom County has a higher share of cost burdened households than the state at 34 percent (30 percent of Washington households are cost burdened). Bellingham and the Kendall CDP have the highest rates of cost burden, at 41 and 49 percent, respectively. With more than one third of households spending more than 30 percent of their income on housing, Whatcom County needs more housing at price points that better align with local incomes.

Figure 20. Share of Cost Burdened Households, Whatcom County, 2021

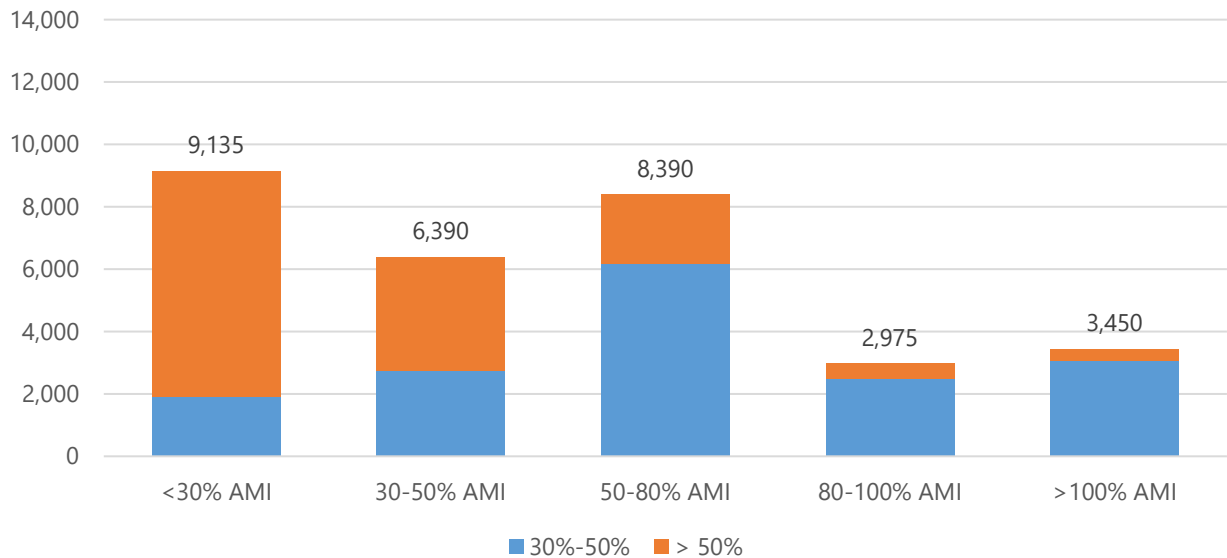


Source: US Department of Housing and Urban Development 2017-2021 Comprehensive Housing Affordability Strategy (CHAS).

Note: Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas refer to the areas within each city boundary. Birch Bay, Kendall, and Peaceful Valley are Census Designated Places (CDPs). Unincorporated includes the areas outside of city limits, excluding the Birch Bay, Kendall, and Peaceful Valley CDPs.

The US Department of Housing and Urban Development (HUD) defines cost-burdened households as those spending more than 30 percent of their income on housing costs. Within Whatcom County, there are cost-burdened households at all income levels. Among households making less than 30 percent AMI are cost burdened, over 9,000 are cost burdened with 7,230 of those households spending more than 50 percent of their income on housing. At the higher end of the income spectrum, there are fewer severely cost burdened households. However, over 6,400 households making at least 80 percent AMI are cost burdened.

Figure 21. Cost Burdened Households by Income Level, Whatcom County, 2021



	Percent of Income Spent on Housing in Whatcom County		
Income Band	< 30%	30-50%	> 50%
< 30% AMI	19%	17%	64%
30-50% AMI	28%	31%	41%
50-80% AMI	47%	39%	14%
80-100% AMI	69%	26%	5%
> 100% AMI	92%	7%	1%

Source: US Department of Housing and Urban Development 2017-2021 Comprehensive Housing Affordability Strategy (CHAS).

As Whatcom County and its cities consider future land use changes, they should be mindful of existing displacement pressures on local communities and neighborhoods. The Washington Department of Commerce has created a draft Displacement Risk Map to help cities and counties understand where residents are most at risk of gentrification and displacement. The map is based on Census tract data – in Whatcom County, this means that some of the data includes areas both within and outside of city limits. The categories used to denote displacement risk include High Risk, Moderate Risk, Low Risk, Demographic and Market Change, and N/A (where there is not sufficient Census data to inform the risk assessment). The WA Department of Commerce uses the matrix in Figure 22 below to determine the risk level of each Census tract. This framework is based on three potential indicators of displacement as

shown in the table. These indicators are all benchmarked based on relationship with the County average (for example a "high" rent is above the 60th percentile of the County, etc.):

- **Social Vulnerability** (characterized by current high share of BIPOC residents, current high share of renters, and current low median household income)
- **Demographic Change** (characterized by decreases in BIPOC residents and increases in median household incomes over the past decade)
- **Market Trends** (looking at if rents were high a decade ago and if they have increased since then)

The combination of the indicators in the first three columns of the table determines the displacement risk "score" in the right column. Various combinations of indicators can lead to high, moderate, or low displacement risk scores, as determined by Commerce's methodology.

The "Demographic & Market Change" category indicates that in that Census Tract, there has been a decrease in BIPOC residents, an increase in household incomes, and that rents were high in 2015 and have increased since then. This indicates that in this area, some displacement due to demographic and market pressures may have occurred in the past decade.

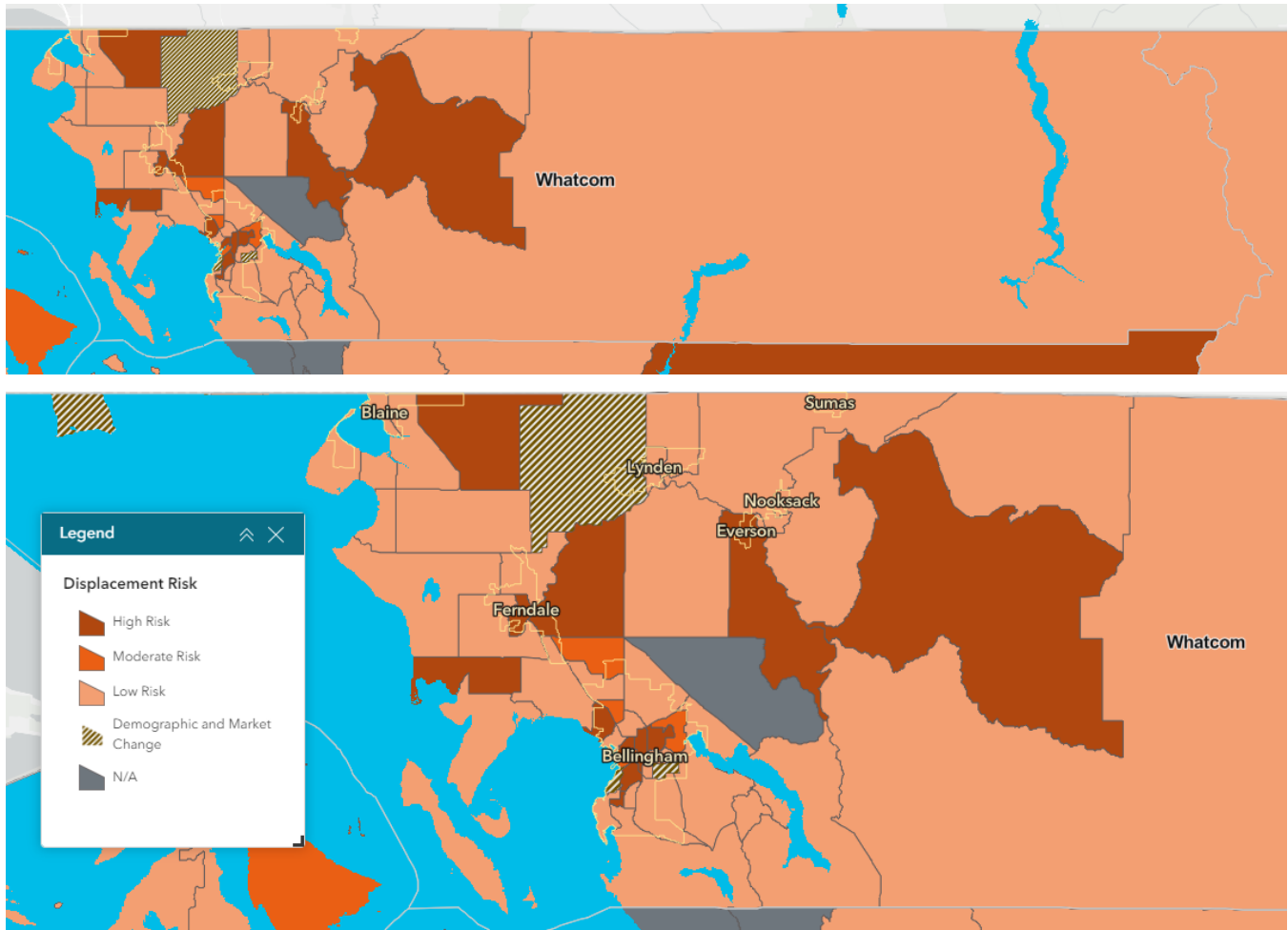
Figure 22. Washington Department of Commerce Displacement Risk Evaluation Matrix

Social Vulnerability	Demographic Change	Market Trends	Displacement Risk
Yes	Gentrification	Accelerating or Stable	High
Yes	No	Accelerating	High
No	Gentrification	Accelerating	High
Yes	No	Appreciated or Stable	Moderate
Yes	Disinvestment	Accelerating	Moderate
Yes	Disinvestment	Appreciated or Stable	Low
No	Gentrification	Stable	Low
No	No or Disinvestment	Appreciated, Accelerating, or Stable	Low
Yes or No	Gentrification	Appreciated	Demographic & Market Change

Source: Washington Department of Commerce Draft Displacement Risk Map.

According to the Washington Department of Commerce’s draft Displacement Risk Map, the areas with the highest displacement risk are located primarily within the municipalities in the western portion of the County. Everson, Ferndale, and Bellingham in particular have significant areas of high displacement risk. There are also significant areas of high displacement risk south of Everson and in the area that includes Kulshan, Van Zandt, Kendall, and Peaceful Valley. The western portion of Lynden has already experienced demographic and market change, as described above. The combination of high cost burden and displacement risk in some of these areas indicates that there is a significant need for additional housing at prices that local residents can afford.

Figure 23. Displacement Risk Maps for Whatcom County



Source: Washington Department of Commerce Draft Displacement Risk Map.

Future Housing Demand

Figure 24 below shows the preliminary population and housing unit targets by UGA and for the Rural & Resource Lands (County Resolution 2025-011, modified by County Council in March 2026). The total countywide housing unit target is 35,229 homes, with over half of those units located in Bellingham. While the County does not have to actually build or finance the construction of these units by 2045, it does need to ensure that it has adequate zoned land capacity to accommodate this number of homes.

Figure 24: Population and Housing Growth Targets 2023-2045

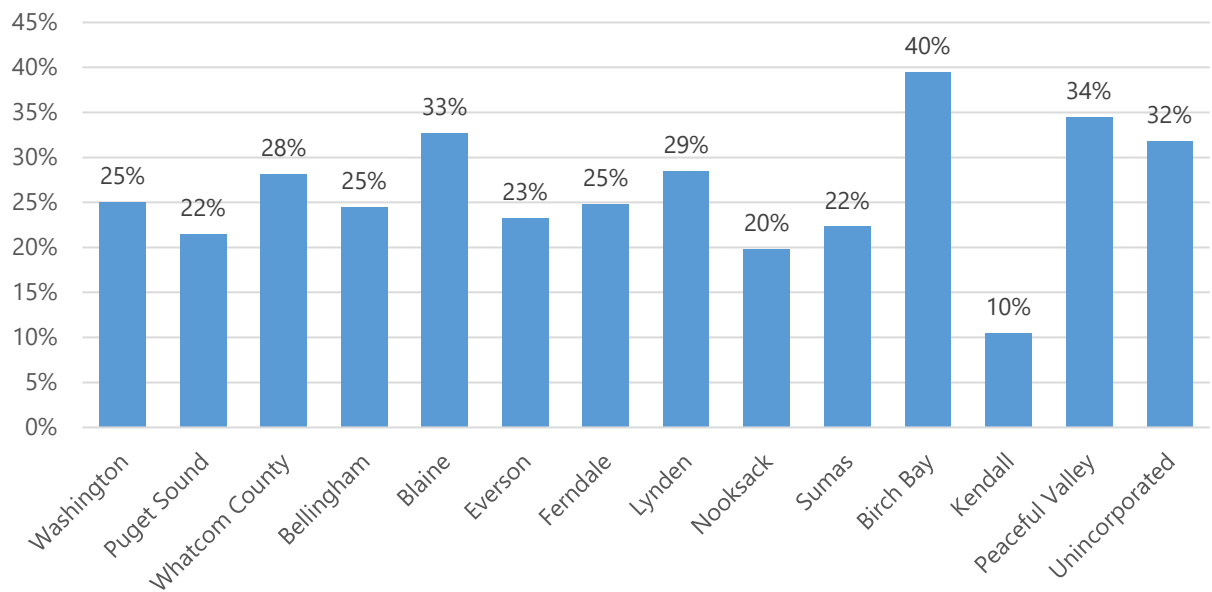
	Population	Population Share	Housing Units	Housing Unit Share
Bellingham City & UGA	30,310	46.0%	18,390	52.2%
Birch Bay UGA	2,662	4.0%	981	2.8%
Blaine City & UGA	3,500	5.3%	1,774	5.0%
Cherry Point UGA	0	0.0%	0	0.0%
Columbia Valley UGA	1,137	1.7%	433	1.2%
Everson City & UGA	1,408	2.1%	610	1.7%
Ferndale City & UGA	10,961	16.6%	4,659	13.2%
Lynden City & UGA	6,665	10.1%	3,535	10.0%
Nooksack City & UGA	995	1.5%	433	1.2%
Sumas City & UGA	1,000	1.5%	643	1.8%
Rural and Resource Lands	7,243	11.0%	3,771	10.7%
Total	65,881	100.0%	35,229	100.0%

Source: Whatcom County Non-Binding Multi-Jurisdictional Resolution No. 2025-011, Adopted March 11, 2025, subsequently modified by County Council in March 2026 for Rural and Resource Lands, Birch Bay UGA, and Columbia Valley UGA.

Special Housing Needs

The term “special housing” refers to types of housing that are not typically delivered by regular market forces. This includes shelters, permanent supportive, accessible, and senior housing. There are nearly 25,700 households in Whatcom County headed by a householder aged 65 or older. Nearly 11,000 of these households are seniors living alone. Birch Bay has the highest share of seniors among Whatcom County jurisdictions, followed by Peaceful Valley and Blaine. Whatcom County has a higher share (28 percent) of senior householders than the state overall (25 percent).

Figure 25. Share of Households with Householders 65 or Older, Whatcom County, 2022

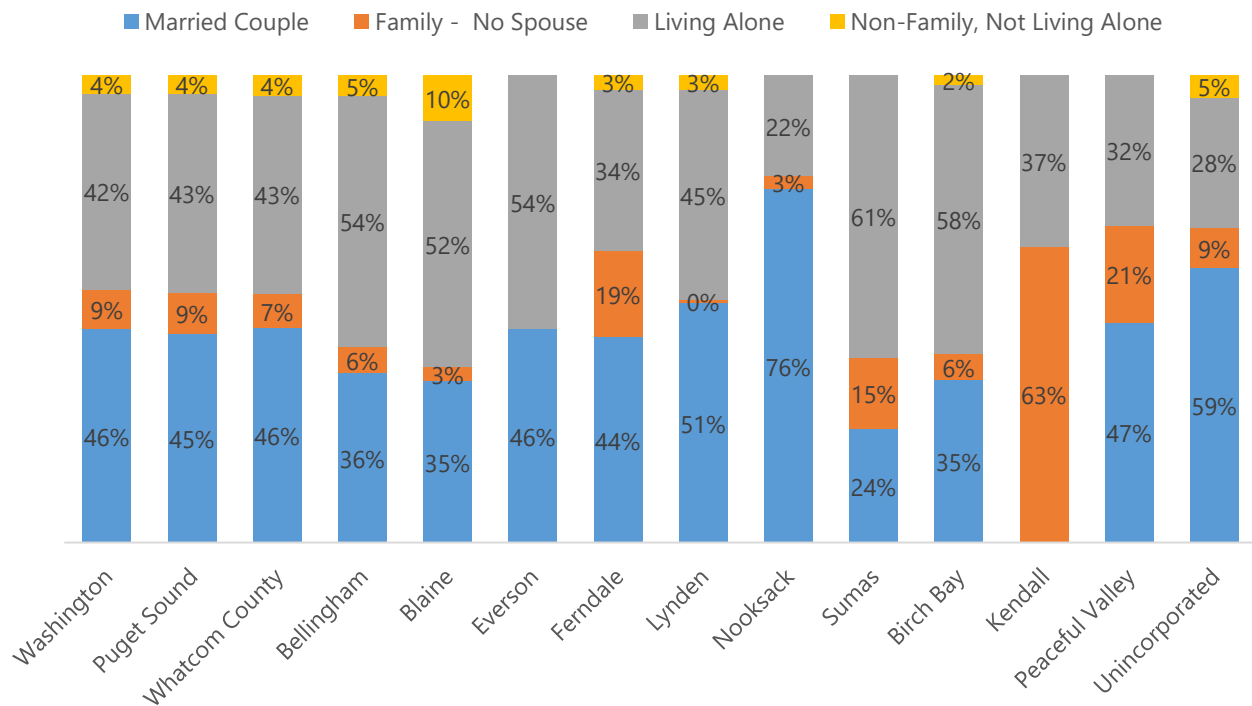


Source: US Census 2022 5-Year ACS, Tables S2501, DP05.

Note: Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas refer to the areas within each city boundary. Birch Bay, Kendall, and Peaceful Valley are Census Designated Places (CDPs). Unincorporated includes the areas outside of city limits, excluding the Birch Bay, Kendall, and Peaceful Valley CDPs.

In Whatcom County, 43 percent of seniors live alone. In Sumas (61 percent), Birch Bay (58 percent), Bellingham (54 percent), Everson (54 percent), and Blaine (52 percent), more than half of seniors live by themselves. In Bellingham, nearly 5,300 seniors (54 percent) live alone. This indicates that there is likely a need for small housing units with enhanced accessibility features that would let this cohort age in place, particularly in areas where they can easily access their everyday needs.

Figure 26. Living Arrangements among Senior Households, Whatcom County, 2022

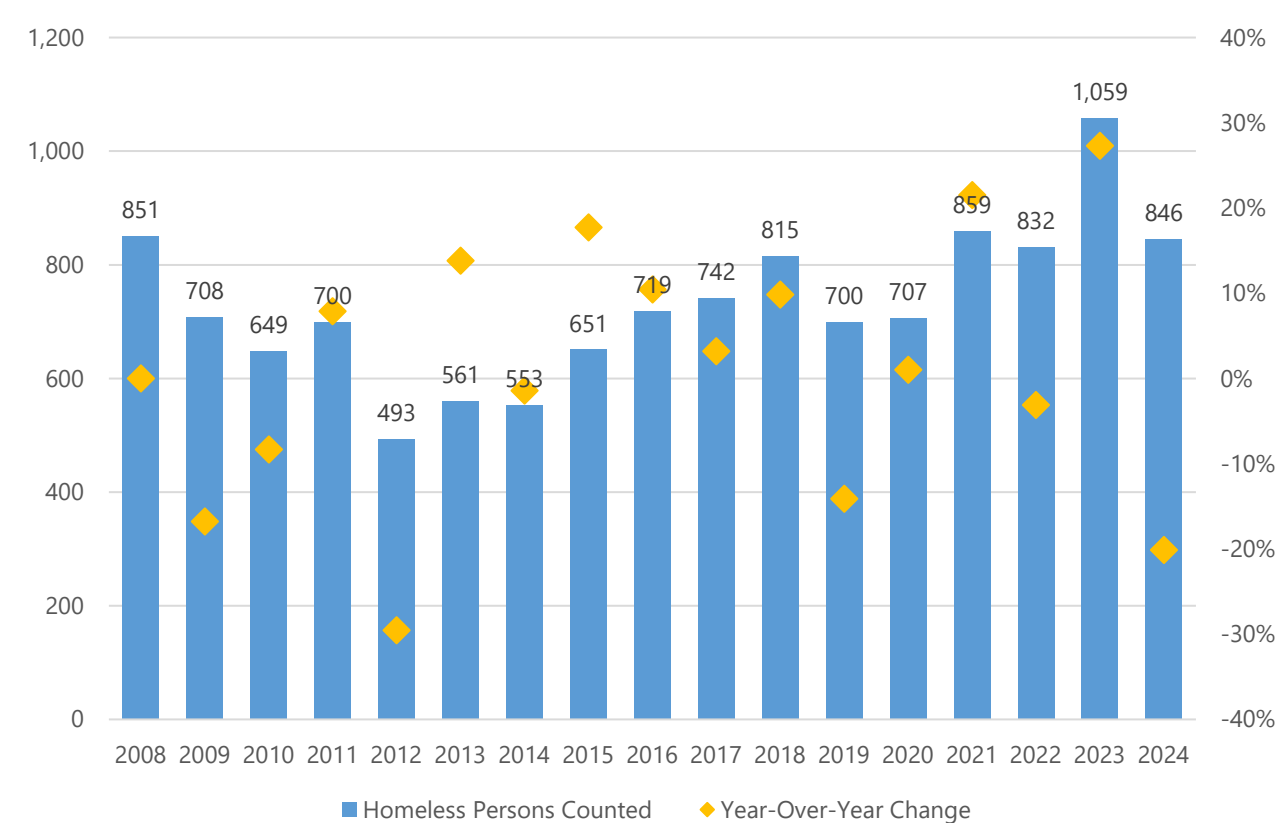


Source: US Census 2022 5-Year ACS, Table S2501.

Note: Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas refer to the areas within each city boundary. Birch Bay, Kendall, and Peaceful Valley are Census Designated Places (CDPs). Unincorporated includes the areas outside of city limits, excluding the Birch Bay, Kendall, and Peaceful Valley CDPs.

As of 2024, the annual Point-in-Time Count found that there were 846 homeless residents in Whatcom County, down from 1,059 in 2023. This represents a 20 percent decrease, bringing the number of homeless residents countywide down to 2022 levels. However, there was a significant increase in families with children experiencing unsheltered homelessness, despite decreases in homelessness among other household types. As of January 2024, 81 families with children were experiencing unsheltered homelessness and 61 families with children were counted in shelters. Nearly 30 percent of homeless individuals were unsheltered at the time of the 2024 count, a slight reduction from the 33 percent unsheltered in 2023. The County's 2024 Homelessness Report emphasizes that the expiration of federal funding for eviction prevention in 2023 limits the amount of funding available for preventing homelessness. For nearly 70 percent of Whatcom County's homeless residents, their last permanent address was within the county. Housing affordability was the most commonly cited cause of homelessness. There were 850 homeless households in 2023, with an average of 1.25 people per household. In 2008, there were 851 homeless residents in 506 households, an average of 1.68 people per household. This suggests a potential shift in demographics, with an increase in the number of homeless individuals. As of 2023, 88 percent of homeless households were unaccompanied individuals.

Figure 27. Whatcom County Point-In-Time Homeless Census and Annual Change in Persons Counted, 2008-2024



Source: Whatcom County Annual Homeless Census (2023); Whatcom County 2024 Point in Time Count.

In order to address the increase in homelessness in Whatcom County, there will be a need for a combination of emergency housing, permanent supportive housing, and affordable housing targeted to individuals making less than 30 percent AMI. In addition, as 15.5 percent of homeless residents are seniors and 28 percent have physical disabilities, there will likely be a need for more accessible affordable housing options.

Workforce Profile

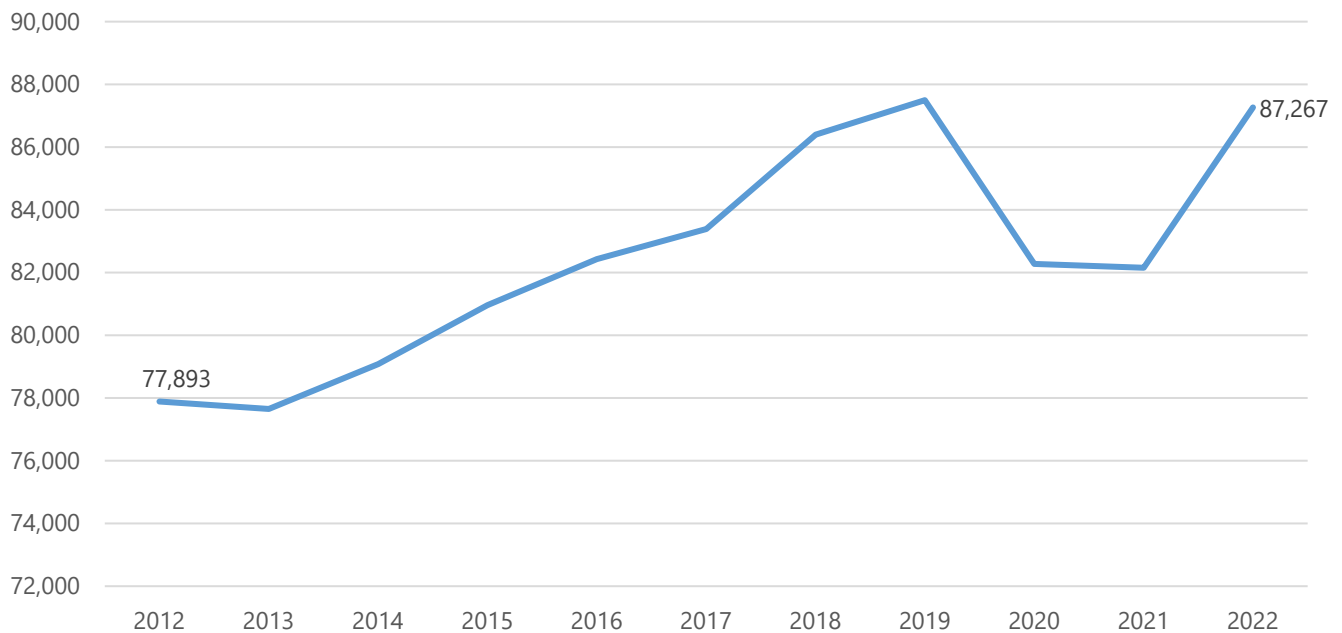
Local Workforce Characteristics

Bellingham is the major job center in Whatcom County – it is home to nearly 60 percent of all jobs in the county. In addition, nearly 22 percent of jobs are located in unincorporated Whatcom County.

The jobs data below comes from LEHD OntheMap. The most recent data year available is 2022 – this is just two years after the mandated business closures during the COVID-19 pandemic, and many job sectors were still recovering from pandemic-related impacts. As of 2022, Whatcom County had

recovered nearly all the jobs lost in 2020. As of 2022, there were 87,267 jobs in Whatcom County, up from 77,893 in 2012 and just below the peak of 87,496 in 2019.

Figure 28. Total Jobs in Whatcom County, 2012-2022



Source: LEHD OntheMap.

Health Care and Social Assistance is the largest job sector in Whatcom County as well as one of the fastest-growing, with a 34 percent increase in jobs between 2012 and 2022. Construction industry jobs in the county grew by 45 percent over the same period.

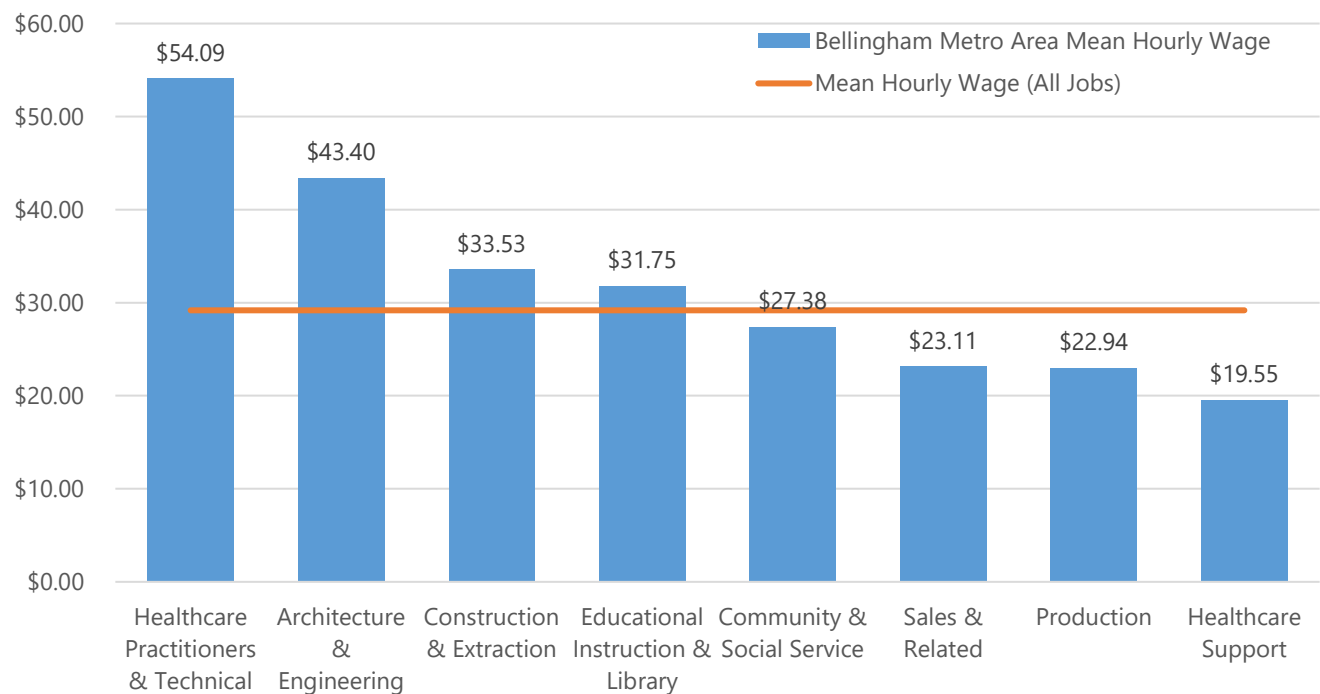
Figure 29. Whatcom County Jobs by Sector, 2012-2022

	2012	2022	Change	Pct. Change
Health Care and Social Assistance	9,575	12,869	3,294	34%
Construction	5,545	8,019	2,474	45%
Professional, Scientific, and Technical Services	3,060	4,252	1,192	39%
Educational Services	8,590	9,423	833	10%
Finance and Insurance	1,598	2,374	776	49%
Accommodation and Food Services	7,086	7,828	742	10%
Administration & Support, Waste Management and Remediation Services	3,359	4,034	675	20%
Real Estate and Rental and Leasing	843	1,322	479	57%
Manufacturing	8,668	9,004	336	4%
Wholesale Trade	2,468	2,796	328	13%
Agriculture, Forestry, Fishing and Hunting	2,666	2,951	285	11%
Transportation and Warehousing	2,232	2,452	220	10%
Retail Trade	8,691	8,785	94	1%
Utilities	223	203	(20)	-9%
Mining, Quarrying, and Oil and Gas Extraction	204	126	(78)	-38%
Other Services (excluding Public Administration)	3,364	3,176	(188)	-6%
Arts, Entertainment, and Recreation	2,434	2,203	(231)	-9%
Management of Companies and Enterprises	600	333	(267)	-45%
Information	1,727	1,356	(371)	-21%
Public Administration	4,960	3,761	(1,199)	-24%
	77,893	87,267	9,374	12%

Source: LEHD OntheMap.

As of May 2022, the mean hourly wage in the Bellingham Metro Area (which includes all of Whatcom County), is \$31.78 (roughly \$66,100 in gross annual income). Figure 30 below shows the mean hourly wage for jobs in the top employment sectors in Whatcom County.

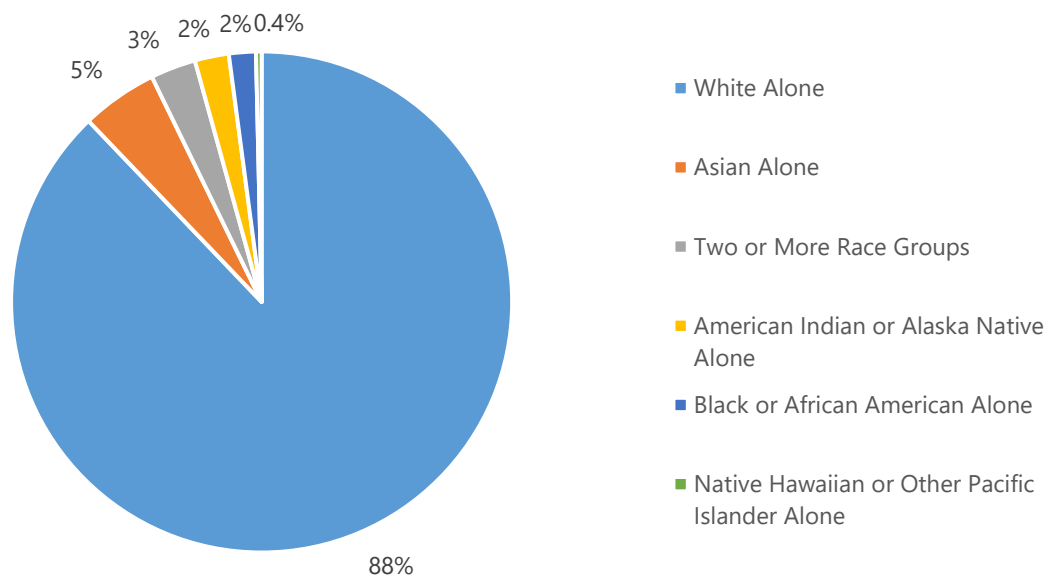
Figure 30. Bellingham Metro Area Mean Hourly Wage for Jobs in Top Employment Sectors, 2023



Source: US Bureau of Labor & Statistics.

As of 2022, 88 percent of workers with jobs in Whatcom County were white, compared with 80 percent of the County’s population. While just one percent of the County’s population is Black/African American, the same is true for just two percent of workers.

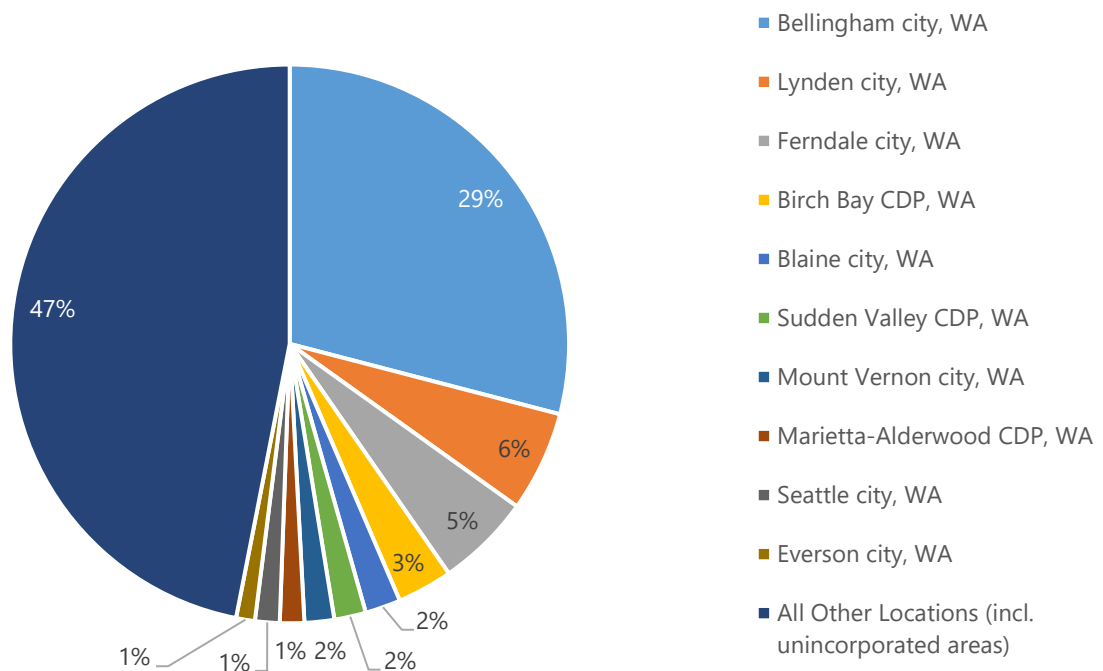
Figure 31. Whatcom County Workers by Race, 2022



Source: LEHD OntheMap.

Jobs in Whatcom County are largely held by local residents, with 29 percent of workers living in the city of Bellingham. However, there are also around 1,500 commuters from Mount Vernon and over 1,200 from Seattle working in Whatcom County. In all, 21,405 people commute to Whatcom County for work while 30,395 Whatcom County residents commute to jobs outside of the county. Over half of jobs in the county are worked by county residents.

Figure 32. Home Locations of Whatcom County Workers, 2022



Source: LEHD OntheMap.

Figure 33. Whatcom County Commuting Patterns, 2022



Source: LEHD OntheMap. "Living locally" refers to people that both live and work in Whatcom County.

There are 96,257 employed residents in Whatcom County. Nearly 51,000 of these employed residents (53 percent) are between the ages of 30 and 54. The top five sectors in which Whatcom County residents work align with the top five county job sectors – Health Care and Social Assistance, Retail Trade, Educational Services, Manufacturing, and Accommodation and Food Services.

Figure 34. Jobs Worked by Whatcom County Residents by Sector, 2012-2022

	2012	2022	Change	Pct. Change
Health Care and Social Assistance	10,067	13,931	3,864	38%
Retail Trade	9,533	10,502	969	10%
Educational Services	8,652	9,947	1,295	15%
Manufacturing	8,572	9,145	573	7%
Accommodation and Food Services	6,925	8,129	1,204	17%
Construction	4,933	7,823	2,890	59%
Professional, Scientific, and Technical Services	3,404	5,270	1,866	55%
Public Administration	5,274	4,494	(780)	-15%
Administration & Support, Waste Management and Remediation Services	3,582	4,473	891	25%
Wholesale Trade	2,894	3,502	608	21%
Other Services (excluding Public Administration)	4,067	3,289	(778)	-19%
Transportation and Warehousing	2,510	3,211	701	28%
Agriculture, Forestry, Fishing and Hunting	2,554	2,768	214	8%
Finance and Insurance	1,901	2,634	733	39%
Arts, Entertainment, and Recreation	2,492	2,386	(106)	-4%
Information	1,621	1,996	375	23%
Real Estate and Rental and Leasing	966	1,408	442	46%
Management of Companies and Enterprises	788	932	144	18%
Utilities	249	277	28	11%
Mining, Quarrying, and Oil and Gas Extraction	256	140	(116)	-45%
	81,240	96,257	15,017	18%

Source: LEHD OntheMap.

Note: This table includes jobs held by people living in Whatcom County. The jobs themselves may be outside of the county.

Figure 35 below shows jobs and local workers by sector in Whatcom County. The industries with the highest oversupply of local workers include Healthcare, Retail, and Professional Services. This indicates that many of these workers commute out of the county. Conversely, the Construction sector in Whatcom County relies on workers from other locations.

Figure 35. Jobs and Local Workers by Sector in Whatcom County, 2022

	Jobs	Local Workforce	Difference
Health Care and Social Assistance	12,869	13,931	1,062
Retail Trade	8,785	10,502	1,717
Educational Services	9,423	9,947	524
Manufacturing	9,004	9,145	141
Accommodation and Food Services	7,828	8,129	301
Construction	8,019	7,823	(196)
Professional, Scientific, and Technical Services	4,252	5,270	1,018
Public Administration	3,761	4,494	733
Administration & Support, Waste Management and Remediation	4,034	4,473	439
Wholesale Trade	2,796	3,502	706
Other Services (excluding Public Administration)	3,176	3,289	113
Transportation and Warehousing	2,452	3,211	759
Agriculture, Forestry, Fishing and Hunting	2,951	2,768	(183)
Finance and Insurance	2,374	2,634	260
Arts, Entertainment, and Recreation	2,203	2,386	183
Information	1,356	1,996	640
Real Estate and Rental and Leasing	1,322	1,408	86
Management of Companies and Enterprises	333	932	599
Utilities	203	277	74
Mining, Quarrying, and Oil and Gas Extraction	126	140	14

Source: LEHD OntheMap.

Jobs to Housing Ratio

As of 2022, there were 87,267 jobs in Whatcom County according to the Census' LEHD dataset, and 102,942 housing units in 2022, according to OFM, for a jobs-to-housing ratio of 0.85. Most of the County's jobs (59 percent) are located in Bellingham, while another 21.6 percent are located in unincorporated areas. Blaine, Everson, Nooksack, Sumas, and unincorporated Whatcom County all have jobs to housing ratios under 1.0, indicating that there are more housing units than jobs in these areas.

Figure 36. Jobs to Housing Ratios for Whatcom County Cities (2022)

	Jobs	Housing Units	Ratio	Percent of Total
Bellingham	51,380	42,712	1.20	58.9%
Blaine	2,750	2,866	0.96	3.2%
Everson	643	1,067	0.60	0.7%
Ferndale	6,150	5,966	1.03	7.0%
Lynden	6,665	6,360	1.05	7.6%
Nooksack	277	547	0.51	0.3%
Sumas	541	729	0.74	0.6%
Whatcom County (unincorporated)	18,861	42,695	0.44	21.6%
Whatcom County (total)	87,267	102,942	0.85	

Source: US Census via LEHD OntheMap; Washington Office of Financial Management.

Employment Trends & Projections

Figure 37 shows preliminary employment targets for Whatcom County for each UGA and the Rural & Resource Lands (County Resolution 2011-011). The majority of job growth is expected in Bellingham, and the highest share of jobs are expected in Commercial sectors, with some industrial and retail growth as well.

Figure 37: 2023-2045 UGA Employment Growth Allocations

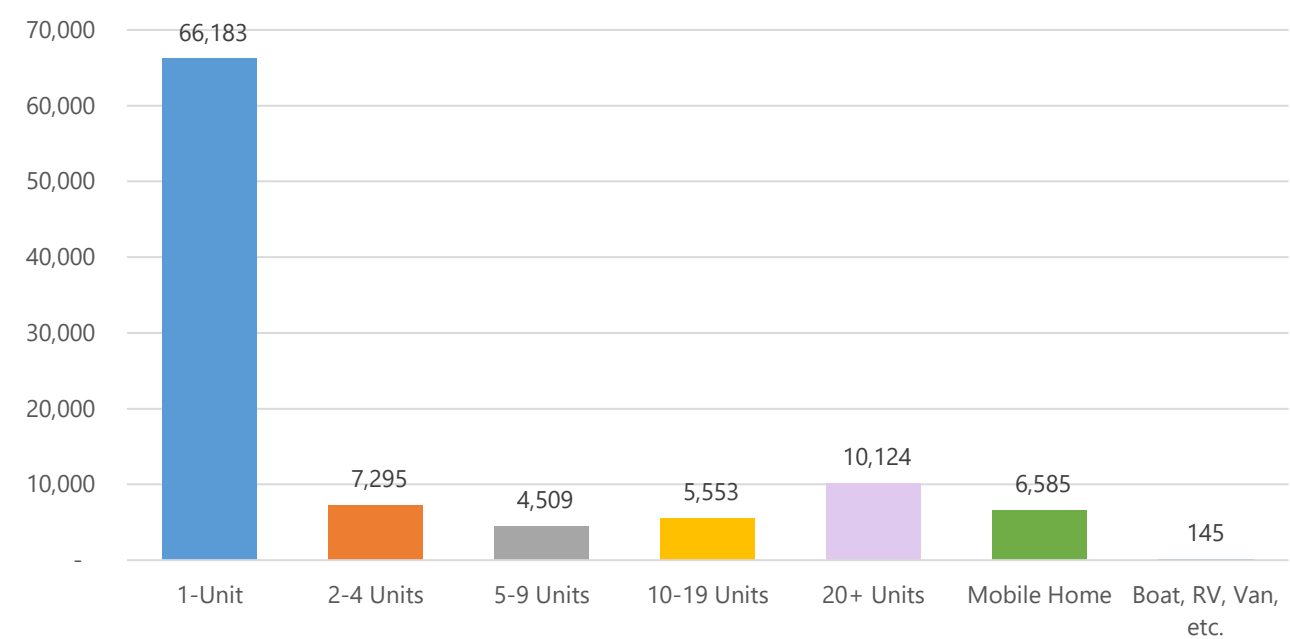
	Net New Employment	Employment Share
Bellingham City & UGA	19,384	59.9%
Birch Bay UGA	450	1.4%
Blaine City & UGA	1,092	3.4%
Cherry Point UGA	1,200	3.7%
Columbia Valley UGA	350	1.1%
Everson City & UGA	602	1.9%
Ferndale City & UGA	3,337	10.3%
Lynden City & UGA	1,799	5.6%
Nooksack City & UGA	232	0.7%
Sumas City & UGA	500	1.5%
Rural and Resource Lands	3,403	10.5%
Total	32,349	100.0%

Housing Supply

General Housing Inventory

There are 100,394 housing units in Whatcom County. The majority of these (66,183) are in single-unit (detached or attached) homes. Of the 27,481 multifamily units in Whatcom County, 37 percent are in buildings with 20 or more units.

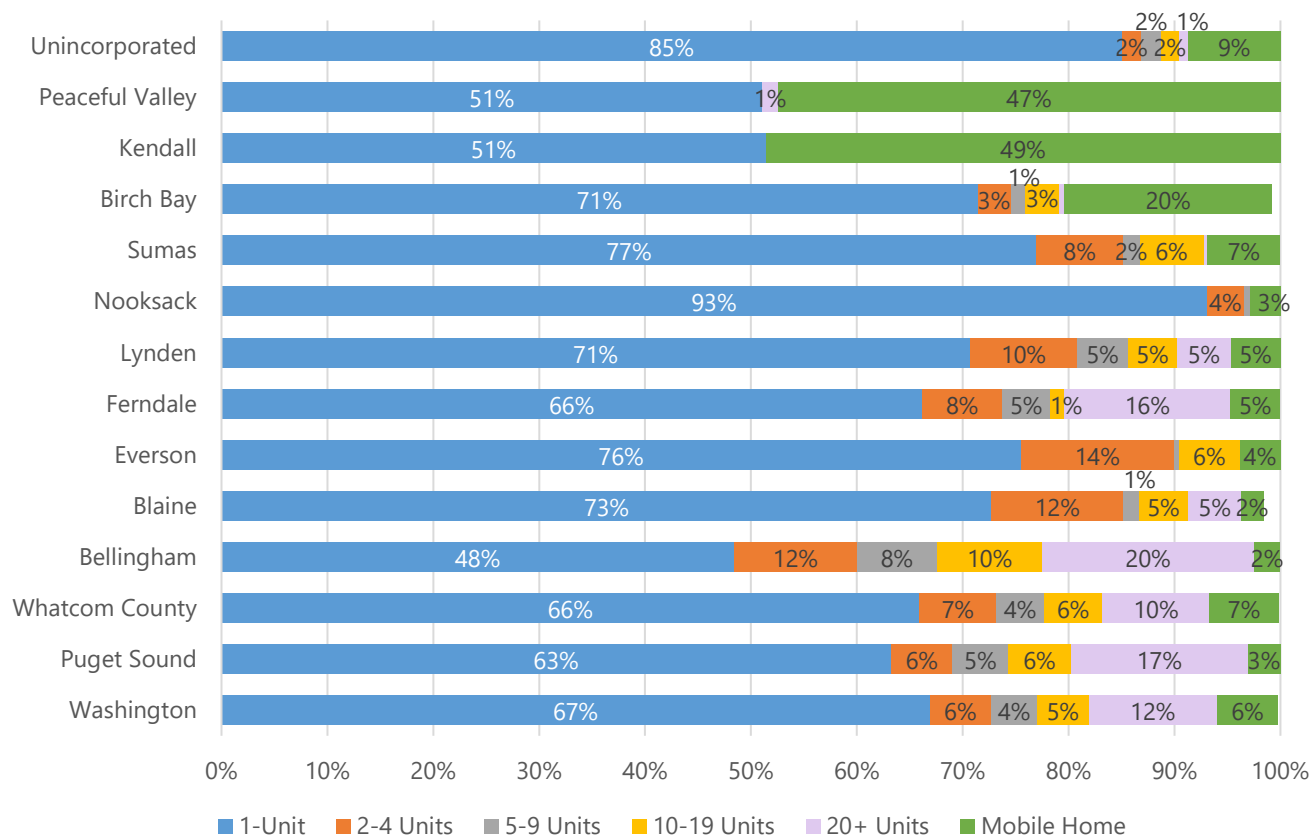
Figure 38. Number of Housing Units in Whatcom County by Type, 2022



Source: US Census Bureau 2022 5-Year ACS, Table DP04.

Statewide, 67 percent of homes are in attached or detached single-unit structures. Whatcom County has a similar share of single unit housing structures (66 percent). Bellingham has the lowest share of housing units in single-unit structures at 48 percent, followed by Peaceful Valley and Kendall (both 51 percent). In Nooksack, 93 percent of the 590 housing units are in single-unit structures.

Figure 39. Housing Units by Type in Whatcom County, the Puget Sound, and Washington, 2022



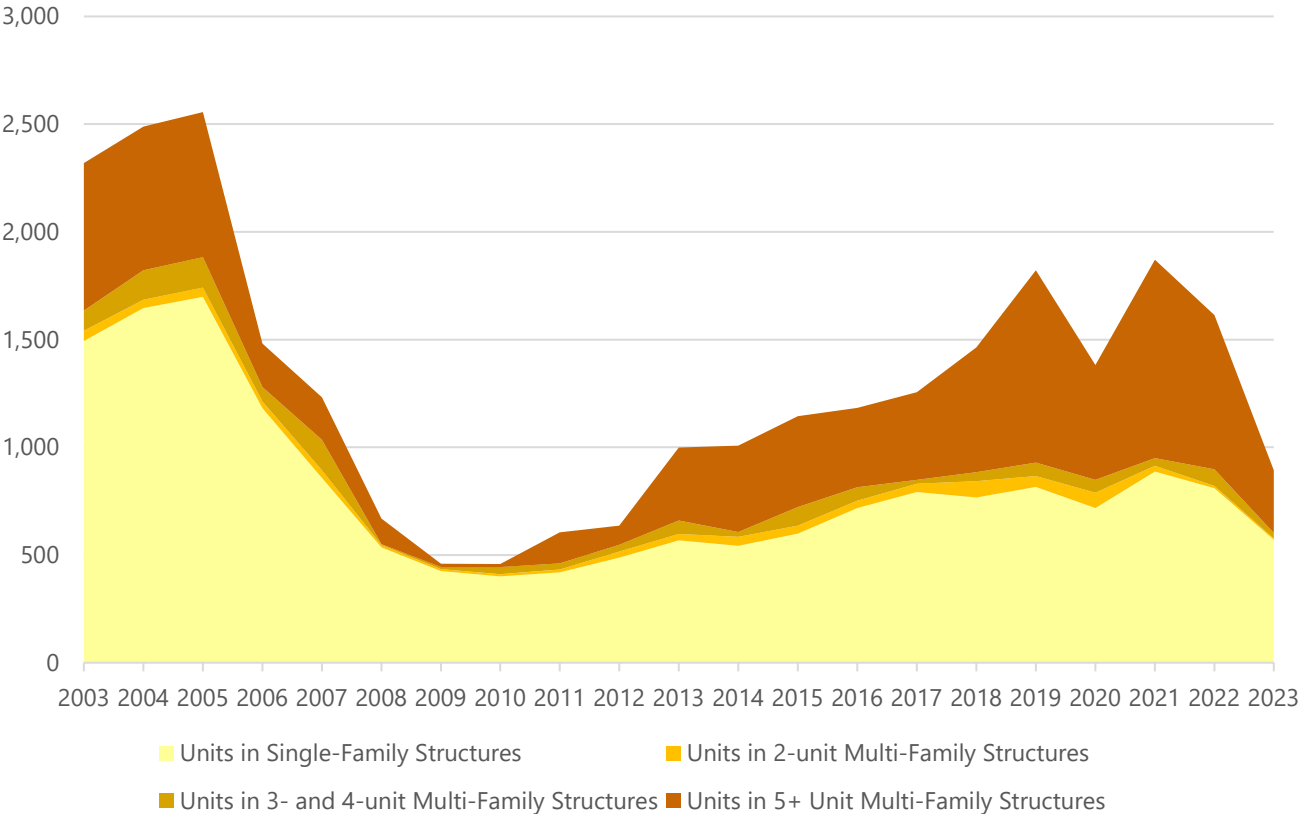
Source: US Census Bureau 2022 5-Year ACS, Table DP04.

Note: The housing category that includes boats, RVs, and vans is not included in this chart.

Housing Market Conditions

Over the last 20 years, 27,542 housing units have been permitted in Whatcom County. Of these, 61.5 percent of these were in single family structures and 38.5 percent were in multifamily structures. Over the past ten years, however, multifamily production has increased and now makes up 47 percent of new units permitted. Despite this uptick in denser construction, permitting has not recovered to its pre-Great Recession peak in Whatcom County.

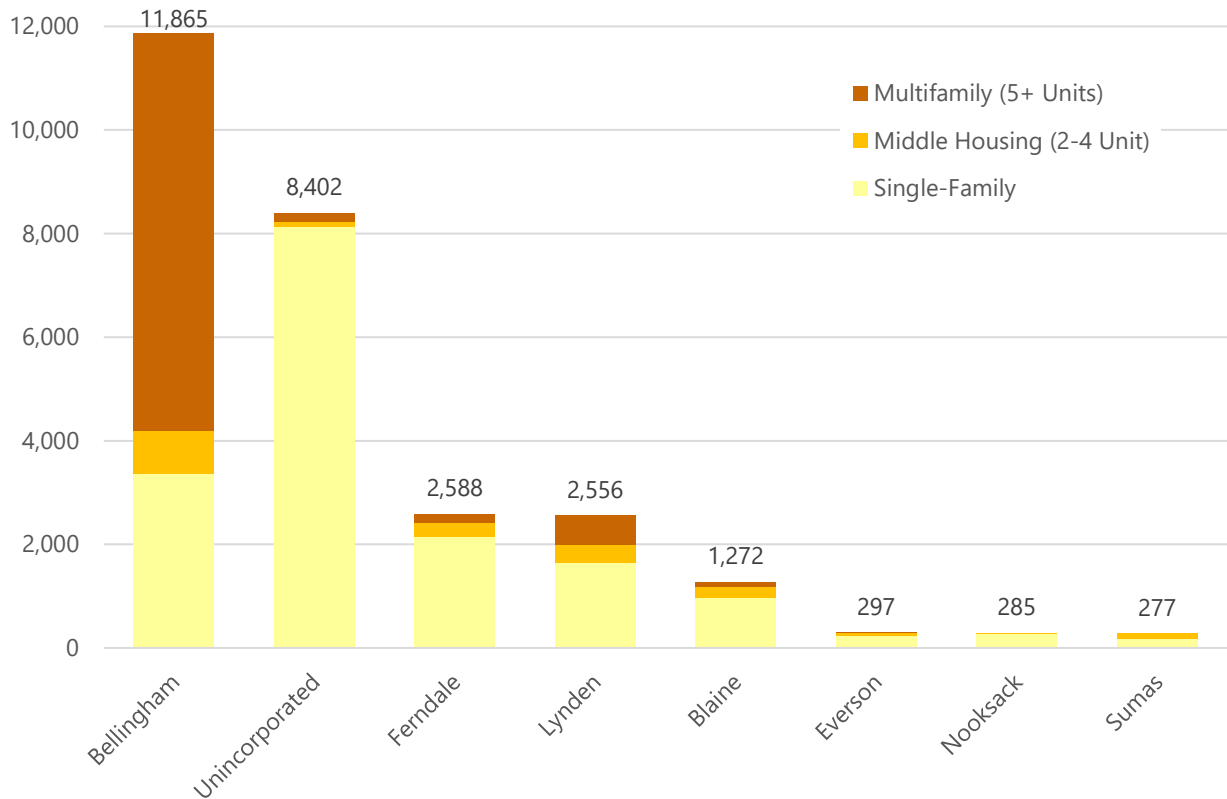
Figure 40. Housing Units Permitted in Whatcom County, 2003-2023



Source: US Census Bureau SOCDS Building Permit Database.

Most of the permitting activity over the past 20 years was in Bellingham, where nearly 12,000 new units were permitted (72 percent middle housing or multifamily), followed by unincorporated areas. Lynden permitted a higher share of multifamily units than the other smaller cities in Whatcom County.

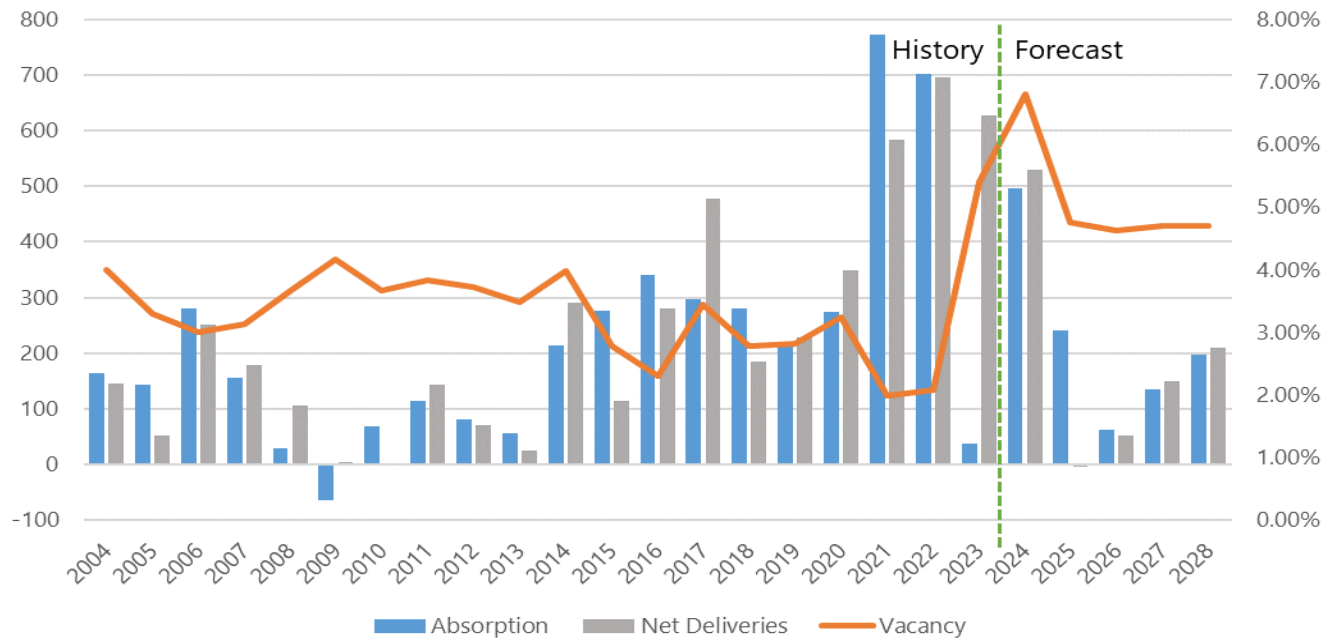
Figure 41. Housing Units Permitted by Type, 2003-2023



Source: US Census Bureau SOCDS Building Permit Database.

According to CoStar, there are around 18,100 multifamily rental housing units in Whatcom County. The vacancy rate for multifamily rental units in Whatcom County is 6.3 percent as of the second quarter of 2024. This is a significant increase from the vacancy rate in 2022, when it was just over two percent. The jump in vacancy rates is due to a large amount of new construction in 2023, when over 600 new multifamily units were delivered in ten buildings. While eight of the ten buildings were in Bellingham, new construction in 2023 also included a duplex in Everson and a 48-unit development in Blaine. The largest new multifamily building completed that year was the 177-unit Park Place Apartments in Bellingham. As of the second quarter of 2024, five new multifamily rental properties have been completed in the county, with a total of nearly 500 units. All of these properties are located in Bellingham. As new multifamily housing came online between 2021 and 2024, the vacancy rate increased to over six percent, but is expected to stabilize as those new units are absorbed.

Figure 42. Absorption, Net Deliveries, and Vacancy Rate for Whatcom County Multifamily, 2004-2028



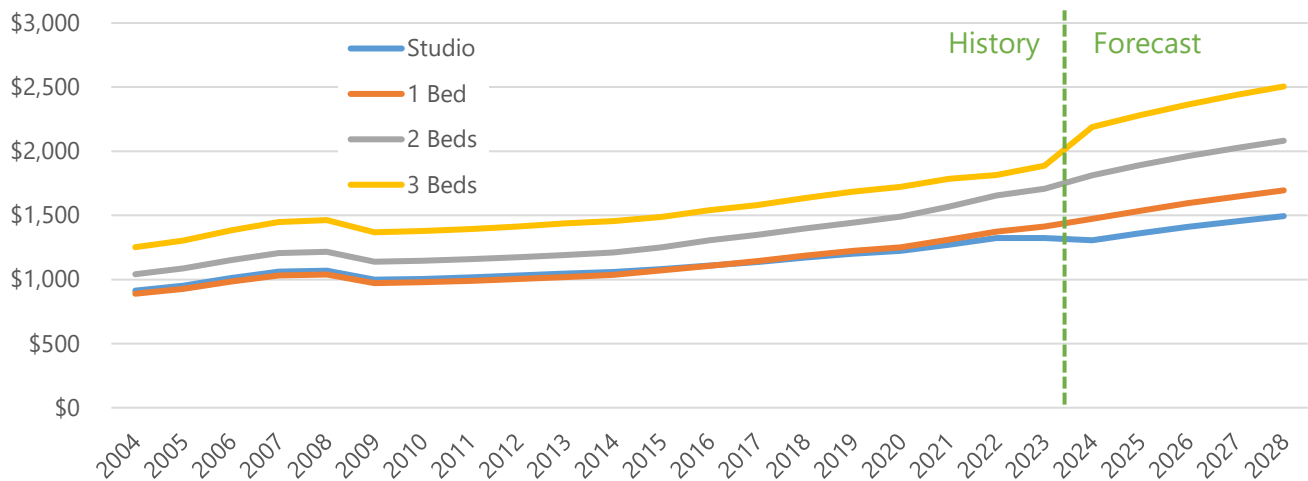
Source: CoStar.

Absorption refers to the change in occupancy over a given period. It is the total units occupied less the total units vacated.

Net Deliveries refers to the net total of new units added over a given period. It is the total units built less the total units removed from the market.

Between 2014 and 2024, the rent for two- and three-bedroom units has increased by around 50 percent, while rent for one-bedrooms increased by 42 percent and rent for studios increased by 23 percent. As of 2024, the market rent for a one-bedroom apartment unit is \$1,472. According to CoStar, this is expected to increase to \$1,695 by 2028. As of the second quarter of 2024, the market asking rent per square foot for apartments is \$2.03.

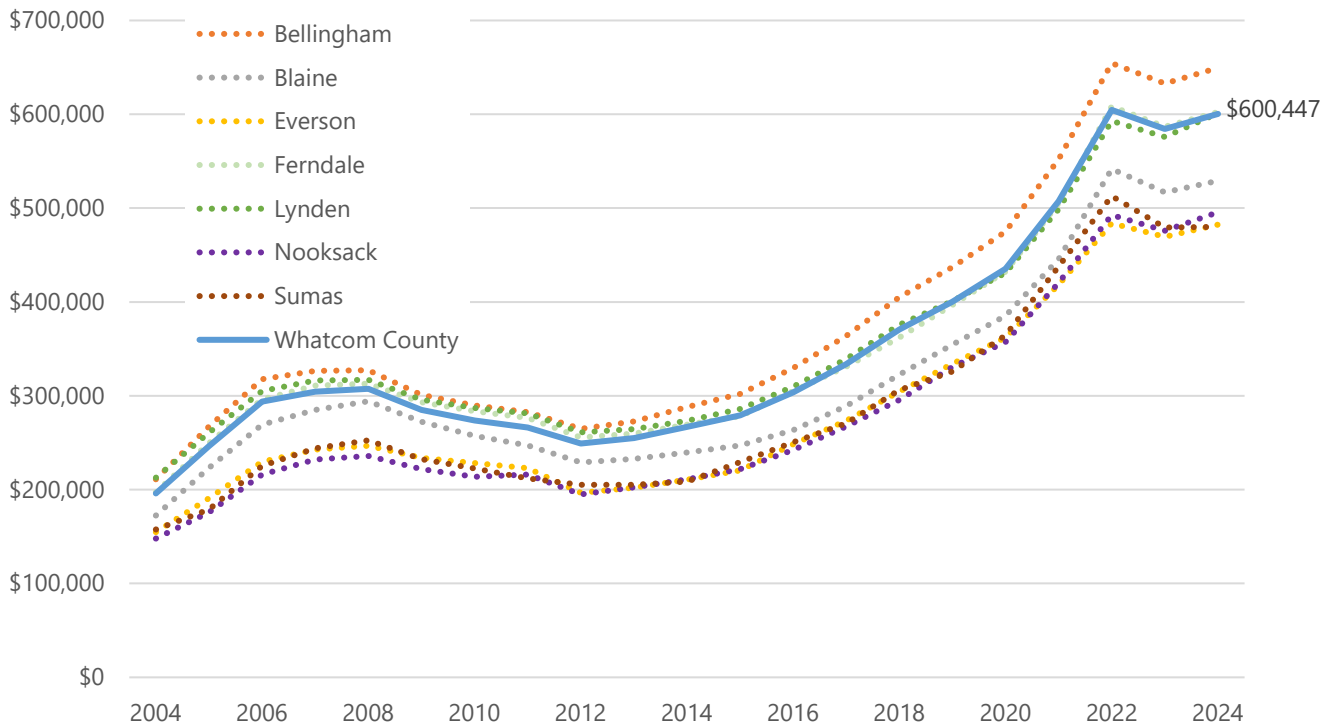
Figure 43. Market Asking Rent per Unit by Bedroom, Whatcom County



Source: CoStar

According to the Zillow Home Value Index, which reflects the typical value for homes in the 35th to 65th percentile range, as of April 2024 the typical home value in Whatcom County was nearly \$600,500. This is a 206 percent increase over the typical home value in 2004. Sumas and Everson have the lowest typical home prices (\$480,170 and \$482,332, respectively), while Bellingham has the highest (\$649,645).

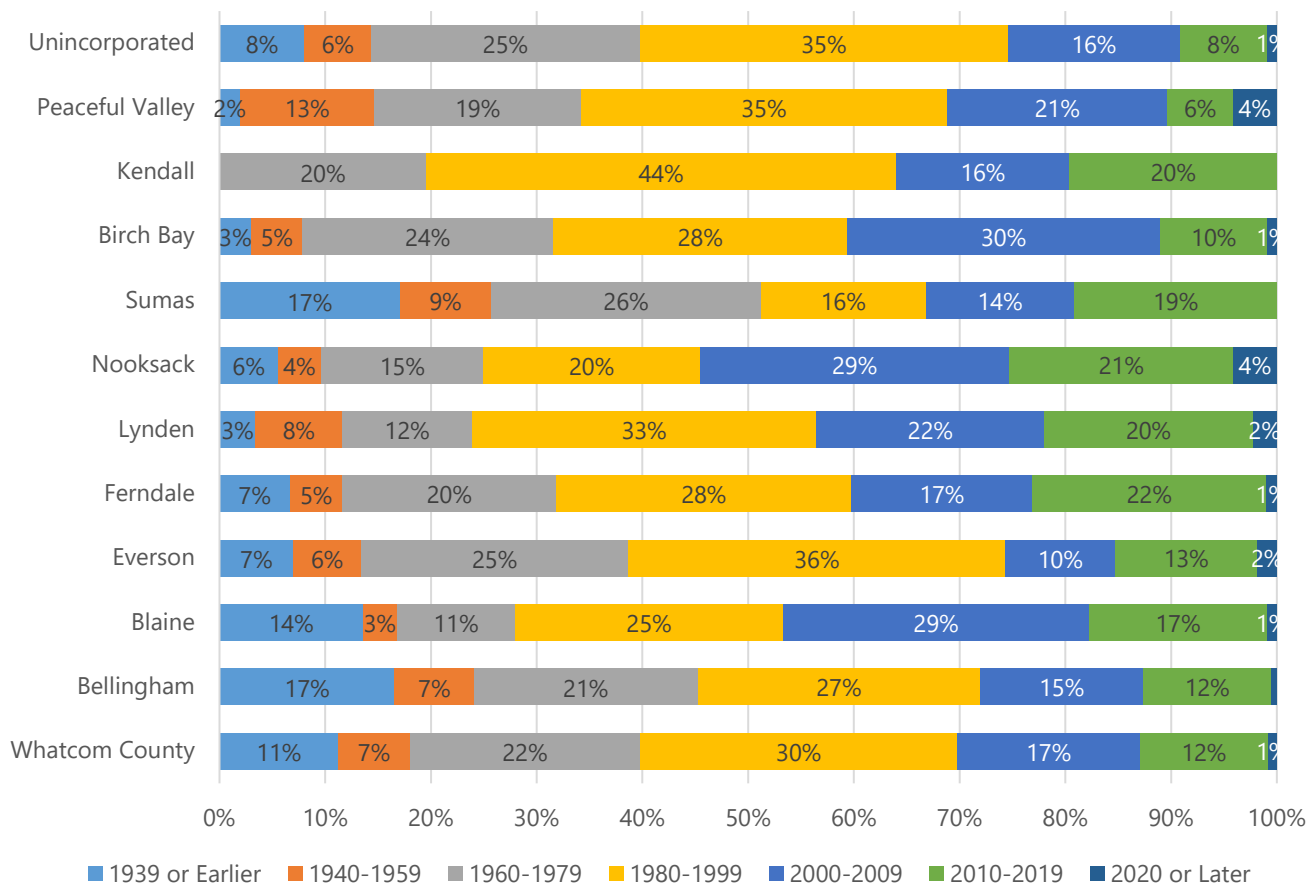
Figure 44. Typical Home Prices in Whatcom County and Select Jurisdictions



Source: Zillow Home Value Index (ZHVI). Values are as of April of each year.

Thirty percent of Whatcom County's 91,171 housing units were built between 2000 and 2022. More than half were built between 1960 and 1999. Sumas has the highest share of housing units built before 1960 (26 percent), while Nooksack has the highest share built between 2010 and 2022 (25 percent). Approximately 40 percent of housing units countywide were built before 1980. There will be a significant need in the coming years to rehabilitate the oldest units and to construct new housing to replace the oldest units.

Figure 45. Housing Units by Year Built in Whatcom County, 2022



Source: US Census Bureau 2022 5-Year ACS, Table S2504.

The US Department of Housing and Urban Development's Comprehensive Housing Affordability Strategy identifies four major housing problems. These are:

- Incomplete kitchen facilities
- Incomplete plumbing facilities
- More than one person per room (overcrowding)
- Cost Burden
 - o "Moderate" – household pays more than 30 percent of their income in housing costs
 - o "Severe" – household pays more than 50 percent of their income in housing costs

In Whatcom County, 30,784 households face at least one of these challenges, with 17,285 households facing severe cost-burden or a combination of severe cost-burden and one of the additional housing problems. Of the households with one or more housing problems, 56 percent are renters. This share jumps to 65 percent for severely cost-burdened households.

Figure 46. Housing Problems by Tenure in Whatcom County, 2021

	Owner	Rental	Total
Household has at least 1 of 4 Housing Problems	13,785	16,999	30,784
Household has none of 4 Housing Problems	40,554	15,177	55,731
Household has at least 1 of 4 Severe Housing Problems	6,455	10,830	17,285
Household has none of 4 Severe Housing Problems	49,620	22,960	72,580

Source: US Department of Housing and Urban Development 2017-2021 Comprehensive Housing Affordability Strategy (CHAS).

Special Housing Inventory

The table below in Figure 47 shows the existing stock of units in Whatcom County serving residents earning under 80 percent of the Area Median Income, including subsidized units serving 0-30 percent AMI households and Permanent Supportive Housing (PSH). As shown, the majority of lower-income and subsidized units, including all of the PSH units in the county, are in Bellingham.

Figure 47. Housing Units Serving Households Earning Under 80% AMI, 2023

	0-30%			
	Non-PSH	PSH	>30-50%	>50-80%
Bellingham City & UGA	1,207	586	4,119	16,782
Birch Bay UGA	197	0	975	1,292
Blaine City & UGA	169	0	246	728
Cherry Point UGA	0	0	1	1
Columbia Valley UGA	153	0	432	727
Everson City & UGA	30	0	120	371
Ferndale City & UGA	203	0	568	1,385
Lynden City & UGA	76	0	328	1,462
Nooksack City & UGA	0	0	29	150
Sumas City & UGA	30	0	83	272
LAMIRDS	335	0	853	990
Area Outside UGAs and LAMIRDS	797	0	2,032	2,369
Total	3,197	586	9,786	26,528

Source: Washington Department of Commerce Housing for All Planning Tool (HAPT), City of Bellingham, City of Blaine, City of Everson, City of Ferndale, City of Lynden, City of Nooksack, City of Sumas, Whatcom County, Leland Consulting Group

The table below in Figure 48 shows 2024 counts of shelters, supportive, and transitional housing in Whatcom County. There are facilities ranging from day shelters to transitional housing and permanent supportive housing in the county with a total of 2,521 beds.

Figure 48. Shelter, Transitional and Supportive Housing Counts, 2021

Type	Total Beds	Total Units
Emergency Shelter – Year-Round	509	144
Emergency Shelter – Seasonal and Hotel/Motels	387	111
Transitional Housing	210	76
PH – Housing with Services (no disability required)	422	188
PH – Permanent Supportive Housing (disability required)	386	333
PH – Rapid Re-Housing	607	252
Grand Total	2,521	1,104

Source: Whatcom County Health Department
Note: Housing with Services includes Group Homes and Care Facilities

The 2024 Point-In-Time Count found a total of 846 individuals experiencing homelessness in Whatcom County on a single night in January of 2024. This is a decrease from the much higher 2023 count of 1,059 individuals (850 households) and is more similar to the level of homelessness seen in 2021 and 2022, as shown below in Figure 49.

Figure 49. Whatcom County Homelessness Point-In-Time Count, 2020-2024

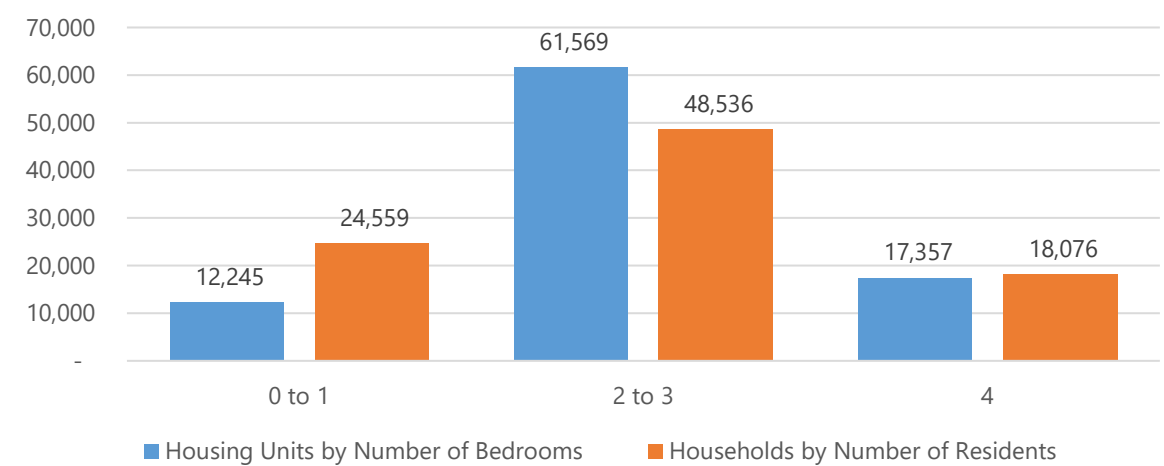
Persons	2020	2021	2022	2023	2024
Sheltered	489	641	650	711	603
Unsheltered	218	218	182	348	243
Total	707	859	832	1,059	846
Households	2020	2021	2022	2023	2024
Sheltered	379	434	482	520	465
Unsheltered	176	192	157	330	206
Total	555	626	639	850	671

Source: Whatcom County Health Department

Gap Analysis

The chart in Figure 50 below shows the households by number of residents compared with housing units by number of bedrooms in Whatcom County. The County has 24,559 one-person households but just 12,245 studio and one-bedroom housing units. In addition, the County has 34,885 households with just two people, some of whom may prefer to live in smaller, one-bedroom units (typically, the US Department of Housing and Urban Development assumes housing units will have 1.5 people per bedroom). This suggests that there is a shortage of smaller housing units countywide.

Figure 50. Housing Units by Number of Bedrooms vs. Households by Number of Residents in Whatcom County



Source: US Census Bureau 2022 5-Year ACS, Tables S2501 and S2504.

Figure 51. Housing Units by Number of Bedrooms, Whatcom County

	Whatcom County	Bellingham	Blaine	Everson	Ferndale	Lynden	Nooksack	Sumas	Birch Bay	Kendall	Peaceful Valley	Unincorporated
0 Bedrooms	3,885	3,086	80	59	179	149	-	-	82	-	47	203
1 Bedroom	8,360	5,850	156	29	318	313	38	56	432	-	101	1,067
2-3 Bedrooms	61,569	25,275	1,614	820	3,627	4,019	389	368	3,619	286	825	20,727
4 or More Bedrooms	17,357	5,874	479	137	1,055	1,305	134	109	713	-	63	7,488

Source: US Census Bureau 2022 5-Year ACS, Table S2501.

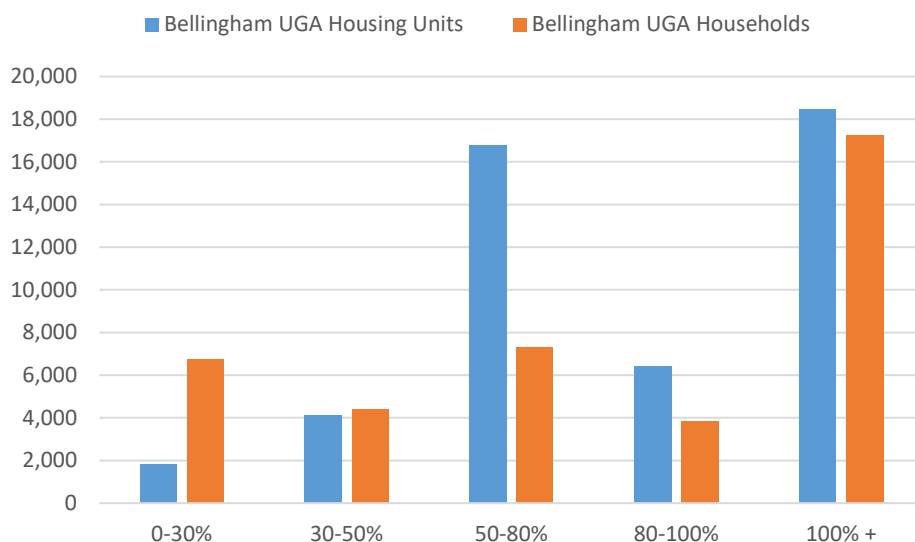
Figure 52. Households by Number of Residents, Whatcom County

	Whatcom County	Bellingham	Blaine	Everson	Ferndale	Lynden	Nooksack	Sumas	Birch Bay	Kendall	Peaceful Valley	Unincorporated
1-Person Household	24,559	13,467	838	222	985	1,505	125	189	1,610	30	289	5,299
2-Person Household	34,885	15,593	661	236	1,433	1,910	147	112	1,997	70	302	12,424
3-Person Household	13,651	5,851	352	268	854	893	158	76	332	87	96	4,684
4- or More Person Household	18,076	5,174	478	319	1,907	1,478	131	156	907	99	349	7,078

Source: US Census Bureau 2022 5-Year ACS, Table S2504.

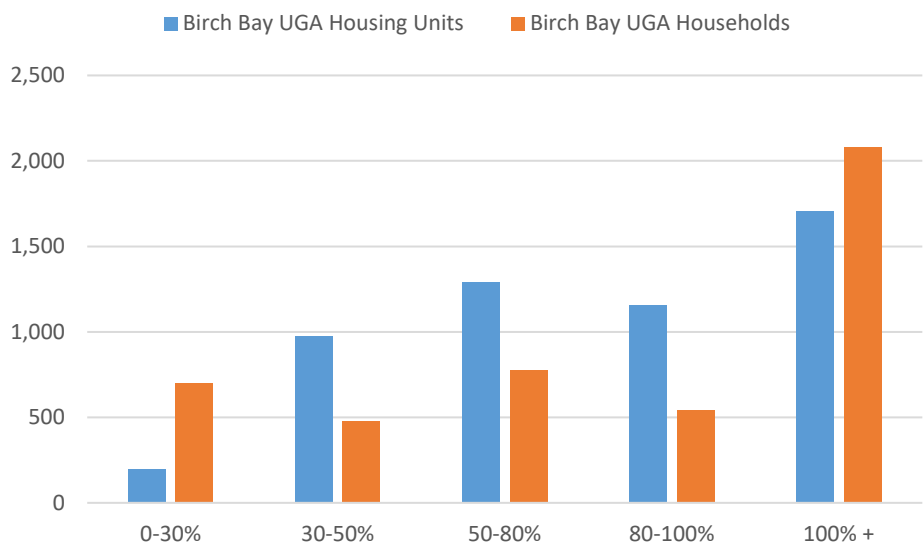
The charts below show a comparison of existing housing units and households at each income band for each UGA, based on data from the Department of Commerce's Housing for All Planning Tool (HAPT) for existing units, and data from HUD's Comprehensive Housing Affordability Strategy (CHAS) for existing households. This data shows the gaps in housing at each income band, and informed the HAPT's calculations of needed housing at each income level shown further below.

Figure 53. Bellingham Existing (2023) Housing Units and Households by Income Band



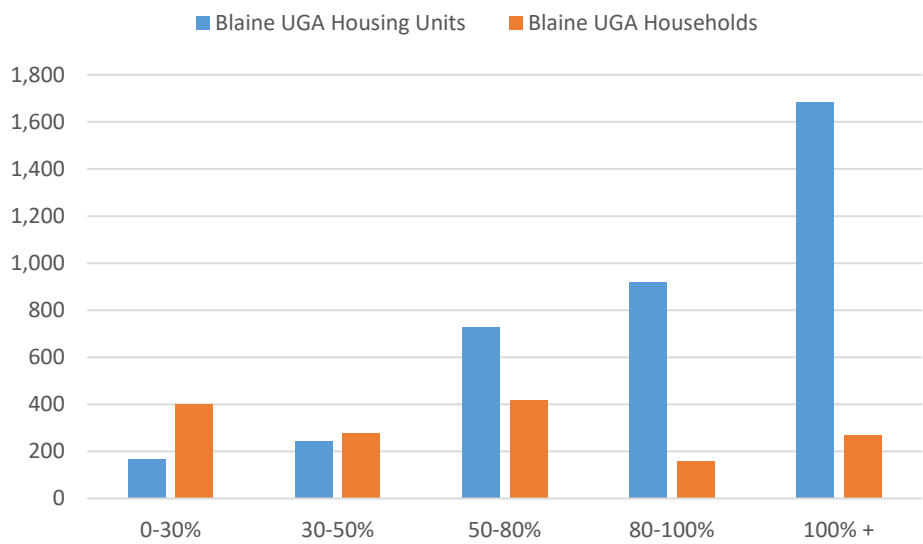
Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 54. Birch Bay Existing (2023) Housing Units and Households by Income Band



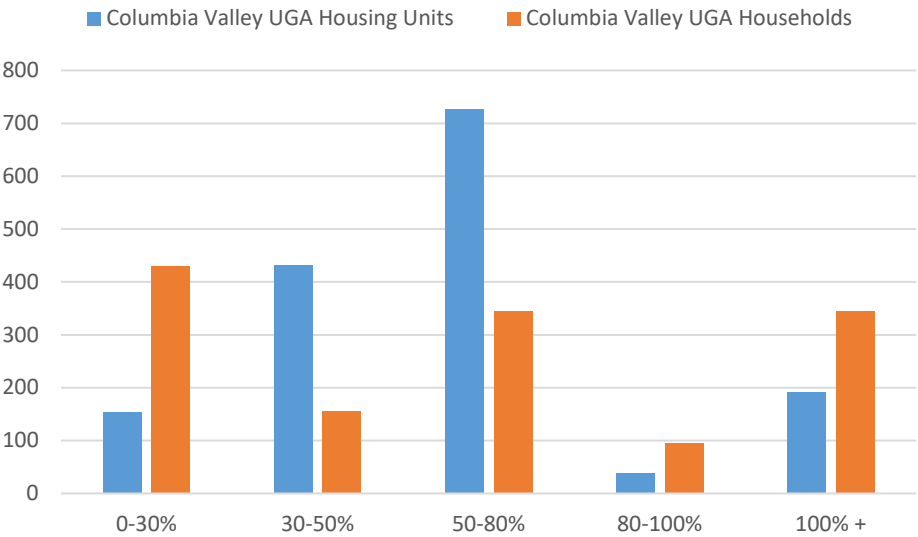
Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 55. Blaine Existing (2023) Housing Units and Households by Income Band



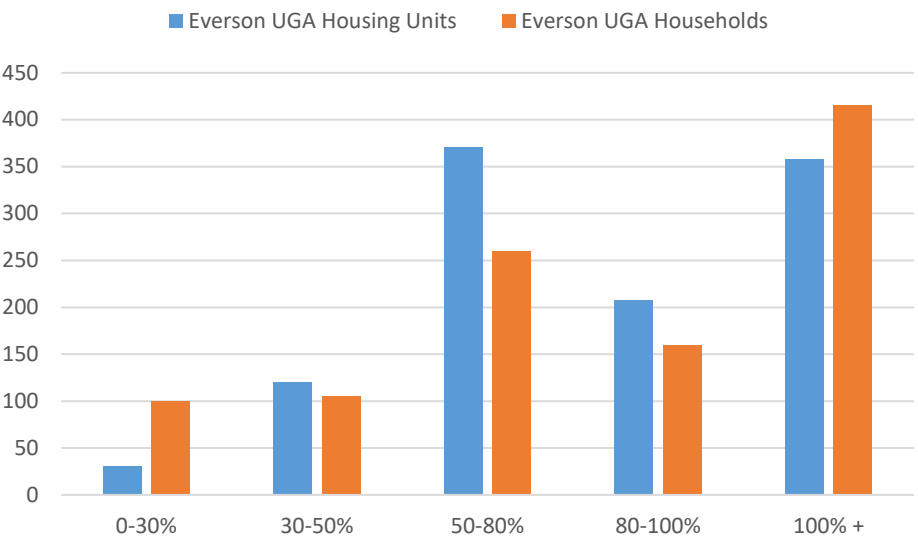
Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 56. Columbia Valley Existing (2023) Housing Units and Households by Income Band



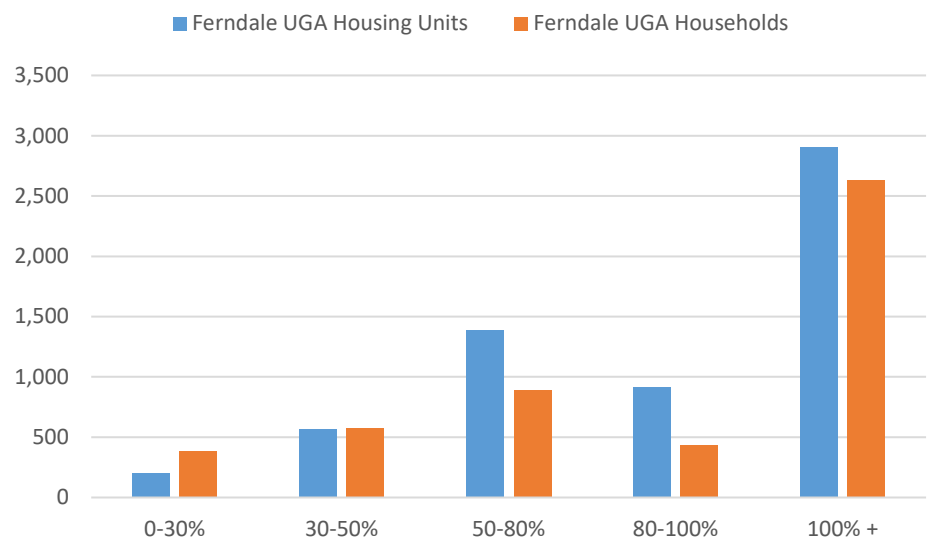
Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 57. Everson Existing (2023) Housing Units and Households by Income Band



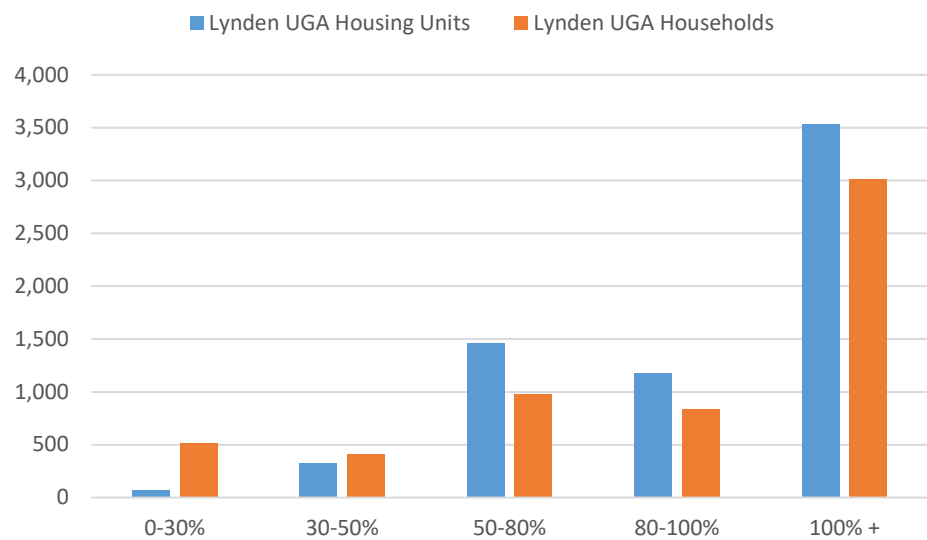
Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 58. Ferndale Existing (2023) Housing Units and Households by Income Band



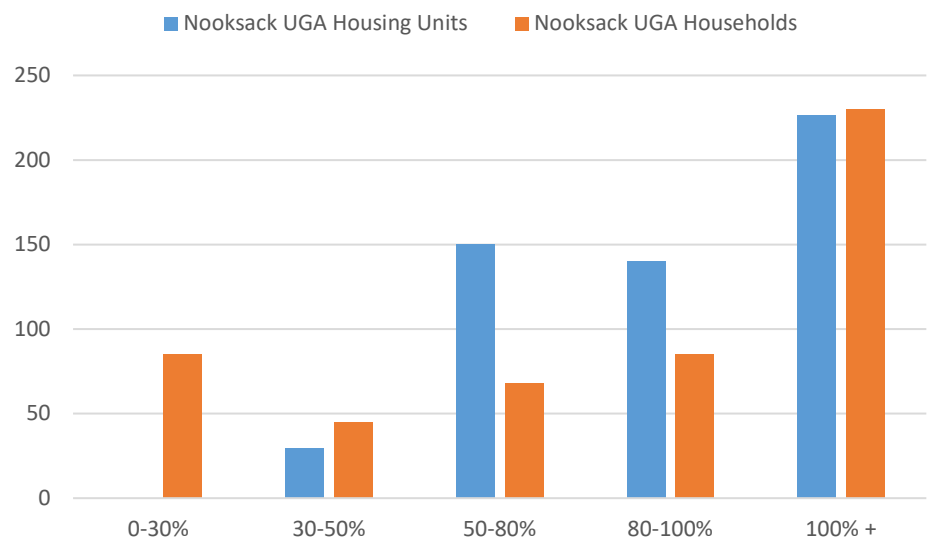
Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 59. Lynden Existing (2023) Housing Units and Households by Income Band



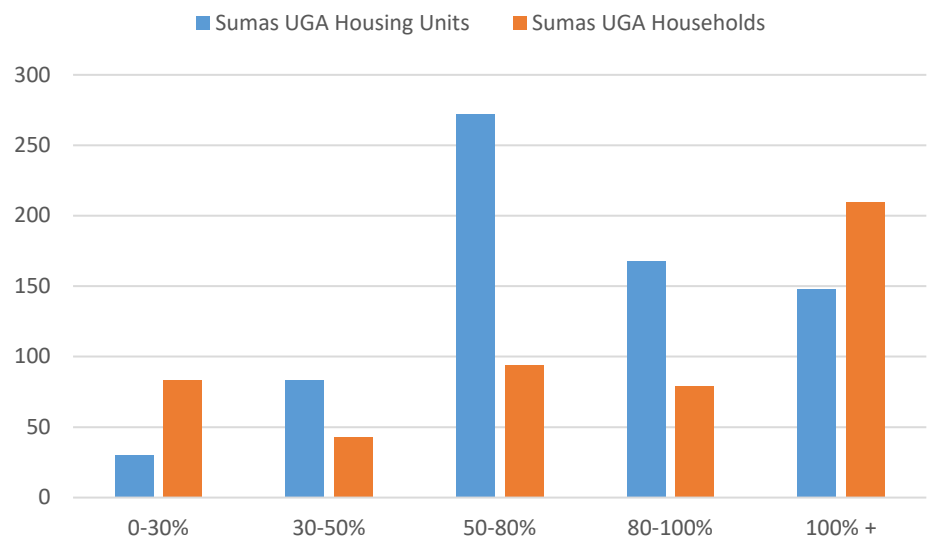
Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 60. Nooksack Existing (2023) Housing Units and Households by Income Band



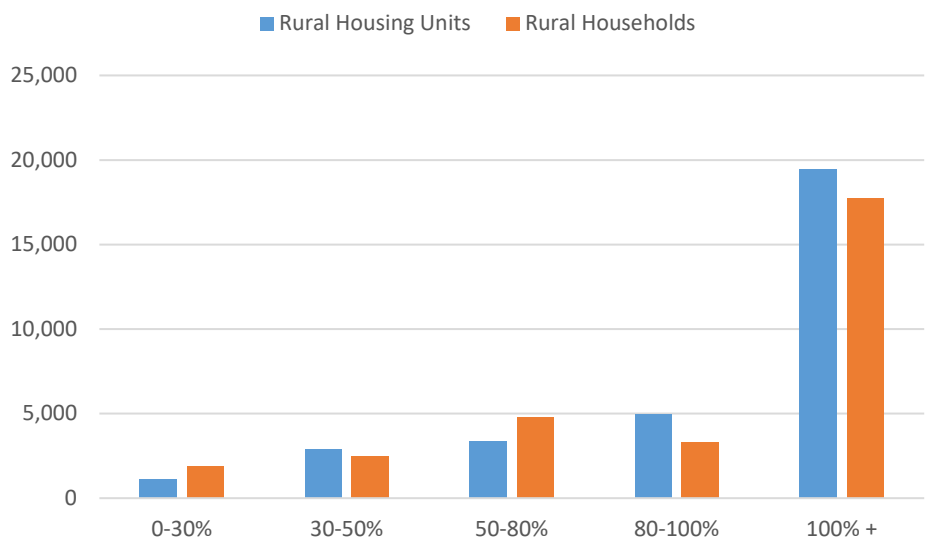
Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 61. Sumas Existing (2023) Housing Units and Households by Income Band



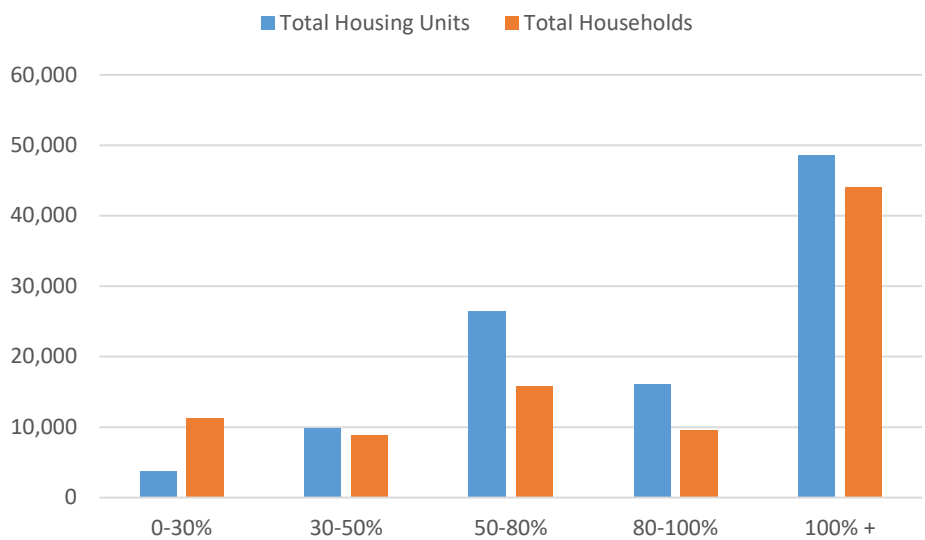
Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 62. Rural Existing (2023) Housing Units and Households by Income Band



Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 63. Total Whatcom County Existing (2023) Housing Units and Households by Income Band



Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

The chart below shows future housing need by income band (shown as a percentage of Area Median Income) for Whatcom County by UGA, and areas outside UGAs. The countywide total needs were determined based on the selected population target put forth by the County and cities, input into the Department of Commerce’s Housing for All Planning Tool (HAPT), which considers a number of factors including current income distribution, current cost-burden, current and projected future homelessness,

and optimal future vacancy rates to determine the breakdown of needed unit capacity by income band. The countywide totals generated by the HAPT were then allocated by UGA, and to the area outside of UGAs, based on the expected percentage of countywide growth in each UGA, and in the area outside of UGAs, within the range of the OFM medium to Leland Consulting Group adjusted high population forecasts set forth in Leland Consulting Group's May 22, 2024 "Population and Employment: Growth Projections and Preliminary Allocations" Technical Report, as selected by each city based on their expected growth trajectories and based on modifications by the County Council in March 2026. The county and cities are then responsible for showing sufficient land capacity by income band for the targets shown in Figure 64, as described further below under "Land Capacity Analysis."

Figure 64. Whatcom County Housing Unit Targets by Income Band, 2023-2045

	% of Total	Total	0-30%		>30- 50%	>50- 80%	>80- 100%	>100- 120%	>120%	Emergency Housing Needs
			Non- PSH	PSH						
Bellingham City & UGA	52.20%	18,390	4,978	1,944	4,158	1,197	989	1,400	3,725	299
Birch Bay UGA	3.25%	1,146	244	103	216	68	136	165	213	17
Blaine City & UGA	5.04%	1,774	480	188	401	115	95	135	359	29
Cherry Point UGA	0.00%	0	0	0	0	0	0	0	0	0
Columbia Valley UGA	1.23%	433	95	46	92	33	27	38	102	8
Everson City & UGA	1.73%	610	165	65	138	40	33	46	124	10
Ferndale City & UGA	13.22%	4,659	1,261	492	1,053	303	250	355	944	76
Lynden City & UGA	10.03%	3,535	957	374	799	230	190	269	716	58
Nooksack City & UGA	1.23%	433	117	46	98	28	23	33	88	7
Sumas City & UGA	1.83%	643	174	68	145	42	35	49	130	10
Rural and Resource Lands	10.24%	3,606	0	0	0	731	145	141	2,589	45
Total	100.00%	35,229	8,472	3,325	7,101	2,788	1,923	2,631	8,989	559

Land Capacity Analysis

As noted above, each UGA must show land capacity to meet the housing unit targets by income band shown above in Figure 64. In cases where jurisdictions cannot show sufficient capacity to meet their targets, land use changes or UGA expansions will need to be adopted concurrently with jurisdictions' comprehensive plans to show sufficient capacity to meet the housing targets.

Land capacity for each UGA was calculated using the Land Capacity Analysis Spreadsheets and the *Whatcom County Land Capacity Analysis For Permanent Housing and Employment Needs Methodology*, except for Bellingham, which used its own internal spreadsheets. The land capacity results are shown below.

Bellingham City & UGA

Bellingham City & UGA Permanent Housing

The future land use assumptions incorporated into the LCA include continued emphasis on strategies proven to be successful and sustainable from previous planning cycles based on the results of the Buildable Lands Report. They also include new changes required by recent state housing legislation. These future assumptions include:

- Continued reliance on mixed use urban villages to accommodate about 1/3 of all future housing and employment growth. These areas have been accommodating this portion of growth for the past 10-15 years and are anticipated to continue to do so through the next 20-years. Urban villages represent about 30-40% of Bellingham's growth capacity on about 4% of the city's total land area. They accommodate growth in a sustainable manner near high-frequency transit, with a mix of employment, service options, and housing affordable to a variety of incomes. The 2025 update includes a newly adopted plan for the Barkley Urban Village with a total capacity of about 3,000 housing units.
- Reconfiguration of residential single zones that currently restrict use to single detached housing. These zones will be renamed "Residential Low" and will allow single-detached housing as well as at least six of the nine middle housing forms identified by HB 1110. These zones will also allow up to four housing units per lot or six with affordability or proximity to high-frequency transit (as per HB 1110). A uniform citywide minimum density (maximum lot size) will also be established to ensure citywide consistency and equity and make the best use of Bellingham's limited supply of buildable land. Each lot allowed by the uniform density will also allow the 4-6 housing units indicated above.
- Reconfiguration of residential multi medium and high zones. These two zones will be renamed "Residential Medium" and "Residential High" dropping the "multi" language in acknowledgement of the city's move away from the binary "single/multi" paradigm. The medium zone will allow limited residential single, and at least six of the nine middle housing forms, and will retain a uniform minimum density. The high zone will allow multi-unit attached housing, and will retain a uniform minimum density. The high zone does not have an upper density limit.

- Changes to residential zoning within the Lake Whatcom Watershed to a new “Residential Watershed” zone. This zone will prioritize limits on development in favor of water quality protection for the watershed which is Bellingham’s municipal water supply.

Bellingham City & UGA Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/ Deficit
0-30 Non PSH	4,978	12,277	5,772	6,505	6,533	28
0-30 PSH	1,944					
30-50	4,158					
50-80	1,197					
80-100	989	2,389	773	1,616	1,970	354
100-120	1,400					
120+	3,725	3,725	953	2,772	2,889	117
Total	18,391	18,391	7,499	10,892	11,392	499

Note: Total Additional Land Capacity does not include Pending Units

Bellingham City & UGA Emergency Housing

Bellingham Emergency Housing Capacity by Zone

Zone	Net Developable Acres	Beds / Acre	Emergency Housing Bed Capacity
Residential Low	138	5	692
Residential Medium	72	25	1,812
Residential High	33	40	1,335
Commercial	32	40	1,288
Industrial	370	25	9,242
Institutional	1	40	51
Urban Village	123	40	4,902
Public	0	0	0
Other mixed zones	7	25	173
Residential Watershed	7	0	0
Airport Operations	1	0	0
Religious Institutions (Gross Acres)	0	4	0
Subtotal	785	25	19,495
Pending			0
TOTAL			19,495

Bellingham Emergency Housing Capacity

Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit	Acres Needed
299	19,495	19,196	12.04

Birch Bay UGA

Birch Bay UGA Permanent Housing

The results below reflect a zoning code amendment to allow duplex, triplex, and fourplex development in the Urban Residential 4 dwellings/acre (UR-4) zone.

Birch Bay UGA Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/ Deficit
0-30 Non-PSH	244	563	0	563	644	81
0-30 PSH	103					
30-50	216					
50-80	68	68	0	68	77	9
80-100	137	302	297	5	128	123
100-120	165					
120+	213	213	301	-88	910	998
Total	1,146	1,146	598	548	1,759	1,211

Note: Total Additional Land Capacity does not include Pending Units

Birch Bay UGA Emergency Housing

Although there is larger theoretical capacity for emergency beds, Whatcom County Code 20.17.040 states " . . . the aggregate total of people in all temporary homeless facilities shall not exceed 100" in unincorporated areas. For purposes of this analysis, 40 of those 100 beds have been allocated to the Birch Bay UGA.

Birch Bay Emergency Housing Capacity by Zone

Zone	Net Developable Residential Acres	Beds / Acre	Emergency Housing Bed Capacity
UR4	152.0	22	3,311
URM6	72.3	22	1,576
URM24	21.2	22	462
RC	33.4	22	728
GC	18.2	22	396
NC	0.0	22	0
Subtotal	297.1		6,473
Pending			0
TOTAL			6,473

Birch Bay Emergency Housing Capacity

Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit	Acres Needed
17	40	23	0.78

Blaine City & UGA

Blaine City & UGA Permanent Housing

All housing can be accommodated with existing city zoning. Please note that no housing growth is included in the area to be de-annexed by the city. The county could consider attributing some modest growth to this area, assuming it’s removed from Blaine’s UGA, as recommended by the Whatcom County Planning Commission and the City of Blaine.

Blaine City & UGA Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/ Deficit
0-30 Non PSH	480	1,184	246	938	954	16
0-30 PSH	188					
30-50	401					
50-80	115					
80-100	95	230	32	198	399	201
100-120	135					
120+	359	359	547	-188	582	770
Total	1,773	1,773	825	948	1,935	987

Note: Total Additional Land Capacity does not include Pending Units

Blaine City & UGA Emergency Housing

Blaine Emergency Housing Capacity by Zone

Zone	Gross Vacant, Partially-Used, and Underutilized Acres	Critical Area Acreage on Vacant, Partially- Used, and Underutilized Parcels	Net Acres	Beds / Acre	Emergency Housing Bed Capacity
R/O	5.5	0.1	5.4	24	130
CB-M-60	0.3	0.3	0.0	60	2
CB-TP-60	2.0	1.0	1.0	60	62
CB-WV	0.0	0.0	0.0	23	0
CB-M-48	0.5	0.2	0.3	28	8
HCc	1.4	0.0	1.4	48	66
Subtotal	9.6	1.5	8.1		268
Pending					0
TOTAL					268

Blaine Emergency Housing Capacity

Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit
29	268	239

Columbia Valley UGA

Columbia Valley UGA Permanent Housing

The results below reflect a zoning code amendment to allow duplex, triplex, and fourplex development in the Urban Residential 4 dwellings/acre (UR-4) zone and rezoning some land in the UGA from UR-4 to Urban Residential Medium Density 6 dwellings/acre (URM-6).

Columbia Valley UGA Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/ Deficit
0-30 Non PSH	95	233	0	233	391	158
0-30 PSH	46					
30-50	92					
50-80	33	33	0	33	41	8
80-100	27	65	0	65	74	9
100-120	38					
120+	102	102	36	66	369	303
Total	433	433	36	397	875	478

Note: Total Additional Land Capacity does not include Pending Units

Columbia Valley UGA Emergency Housing

Although there is larger theoretical capacity for emergency beds, Whatcom County Code 20.17.040 states " . . . the aggregate total of people in all temporary homeless facilities shall not exceed 100" in unincorporated areas. For purposes of this analysis, 15 of those 100 beds have been allocated to the Columbia Valley UGA.

Columbia Valley Emergency Housing Capacity by Zone

Zone	Net Developable Residential Acres	Beds / Acre	Emergency Housing Bed Capacity
UR4	95.1	22	2,072
URM6	55.1	22	1,201
GC	1.8	22	38
Religious Institutions (Gross Acres)		4	0
Subtotal	152.0		3,311
Pending			0
TOTAL			3,311

Columbia Valley Emergency Housing Capacity

Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit	Acres Needed
8	15	7	0.37

Everson City & UGA

Everson City & UGA Permanent Housing

To support the population projection allocation of 611 additional housing units from 2023-2045, Everson has revised development codes to accommodate higher density housing. In the past few years, the city has reduced the minimum lot size in the residential zones and implemented code language that allows planned unit developments to be created under a conditional use permit in the Residential Multiple-Use zone.

- 5 units per acre: SF in Res and RMU
- 10 units per acre: Duplex/MF in RMU
- PUDs must be on at least an acre. Flexibility in lot size, width, setbacks, etc. Overall density must comply with the minimum lot size for MF (4,250 sq ft per unit).

HB 1337, which creates new regulations for accessory dwelling units, will also bring increased density in all residential zones. In December 2025, the city implemented these new regulations into the Everson Municipal Code. In the past, Everson only allowed one ADU per residential lot as a permitted or conditional use. These new regulations now allow for two ADUs per residential lot as a permitted use. The city is also proposing to allow zero-lot line townhomes as a permitted use in the RMU zone instead of as a conditional use. This is to help eliminate barriers to building more affordable housing.

In addition to these ongoing code changes, the comprehensive plan update will allow the city to reevaluate the current development code and make changes to better support permanent and supportive housing and remove potential barriers to housing development.

The comprehensive plan update will also allow for rezoning properties to reflect appropriate densities. For example, all FEMA buy-out properties are proposed to being rezoned to agricultural from residential zoning. These properties are within the undevelopable floodway and are not appropriately zoned. To compensate for loss of residential land, the city is proposing to upzone several properties into the RMU zone to allow for higher densities in more appropriate areas.

Even with zoning and code changes, the city is unable to accommodate the projected 611 housing units without the proposed UGA expansion areas to the west, outside of the floodplain. Without the proposed expansions, the city's LCA shows an overall housing deficit of 51 units, including a deficit of 40 and 12 units in the low-income and middle-income brackets, respectively.

Everson is dedicated to supporting safe and affordable housing in a rapidly growing city. To achieve this, the city must focus on developing outside of the floodplain, rather than encouraging high density housing within flood prone areas.

Everson City & UGA Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/ Deficit
0-30 Non PSH	165	408	42	366	374	8
0-30 PSH	65					
30-50	138					
50-80	40					
80-100	33	79	28	51	72	21
100-120	46					
120+	124	124	104	20	21	1
Total	611	611	174	437	466	29

Note: Total Additional Land Capacity does not include Pending Units

Everson City & UGA Emergency Housing

Everson Emergency Housing Capacity by Zone

Zone	Net Developable Residential Acres	Beds / Acre	Emergency Housing Bed Capacity
Commercial	11.0	15	164
Religious Institutions (Gross Acres)	10.9	4	46
Subtotal	11.0		210

Everson Emergency Housing Capacity

Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit	Acres Needed
10	210	200	0.67

Ferndale City & UGA

Ferndale City & UGA Permanent Housing

We are proposing to rezone existing land within the City to:

- RS High Single family Dwelling (RSH)
- Residential Multifamily Medium (RMM)
- Residential Multifamily High (RMH)
- Light Industrial (LI)
- Manufacturing (M)
- General Business (GB)
- Mixed Use Commercial (MXD)

In the UGA we are proposing future zoning:

- RS High Single family Dwelling (RSH)
- Residential Multifamily Medium (RMM)
- Residential Multifamily High (RMH)
- General Business (GB)
- Mixed Use Commercial (MXD)
- Neighborhood Commercial (NC)

The neighborhood commercial zone is a new zone we created.

Ferndale City & UGA Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/ Deficit
0-30 Non PSH	1,261	3,109	611	2,498	2,740	242
0-30 PSH	492					
30-50	1,053					
50-80	303					
80-100	250	605	0	605	856	251
100-120	355					
120+	944	944	15	929	1,179	250
Total	4,658	4,658	626	4,032	4,775	743

Note: Total Additional Land Capacity does not include Pending Units

Ferndale City & UGA Emergency Housing

Ferndale Emergency Housing Capacity by Zone

Zone	Net Developable Residential Acres	Beds / Acre	Emergency Housing Bed Capacity
RS Low	109.4	5	547
RS Medium	67.3	7	471
RS High	57.1	9	514
RMM	159.7	20	3,193
RMH	33.6	20	671
RO	3.3	20	66
GB	0.0	20	0
MXD	84.8	20	1,697
CC	0.0	20	0
RR	0.0	20	0
UR	4.6	20	92
Religious Institutions (Gross Acres)		4	0
Subtotal	519.7	14	7,251

Ferndale Emergency Housing Capacity

Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit	Acres Needed
76	7,251	7,175	5.45

Lynden City & UGA

Lynden City & UGA Permanent Housing

Lynden has acted to increase housing density across the city in several ways. These changes allow for the construction of housing types which are more affordable than the traditional single-family detached housing. To maximize land capacity in newly developed areas the city pre-zoned sections of its Urban Growth Area with a zoning category created specifically for 'middle housing'. This category accommodates attached housing units on small lots with an increase height limit to allow for 3-story construction, facilitating the opportunity of a 'for sale' townhome product. To facilitate infill opportunities, Lynden revised its mixed-use zoning category to allow for the creation of housing without the need to construct a commercial component. Instead of a required commercial component, the revision allowed high density housing in focused areas around six existing commercial centers throughout the city (Ordinance 1657). When originally created the maximum density of the mixed-use code was set at 28 dwelling units per acre but based on conceptual housing designs, and with the need to increase affordable housing types such as stacked apartments, the City has adjusted the maximum density to 40 units per acre with the 2025 Comprehensive Plan update with an update . Simultaneously, Lynden adapted the mixed-use overlay to recognize that within the central core of the city, where lots were smaller, there was a desire to convert existing commercial structures to residential uses. To address this the City adopted a code for a small-scale mixed use which allows for the conversion of structures or new construction within the central city core (Ordinance 23-1669). Other changes to zoning include the adoption of new accessory dwelling unit (ADU) regulations to be consistent with State legislation. Regulations previously allowed at one ADU per single-family lot the revision allowed for two ADUs per lot (City of Lynden Ordinance 24-1683). The City also recognized that manufactured home communities within the city provided a source of affordable housing and the regulations one these communities were revised to allow for increased density as well as the potential densification of existing non-conforming manufactured home communities. Finally, an overarching code amendment made in 2025 eliminated the requirement for multi-family and commercial projects to seek design review approval through a Design Review Board. Instead, standards were written into code to eliminate subjective interpretation (City of Lynden Ordinance 25-1706).

Lynden City & UGA Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/ Deficit
0-30 Non-PSH	957	2,360	241	2,119	2,217	98
0-30 PSH	374					
30-50	799					
50-80	230					
80-100	190	459	140	319	1,207	888
100-120	269					
120+	716	716	75	641	732	91
Total	3,535	3,535	456	3,079	4,156	1,077

Note: Total Additional Land Capacity does not include Pending Units

Lynden City & UGA Emergency Housing

Lynden Emergency Housing Capacity by Zone

Zone	Net Acres	Beds / Acre	Emergency Housing Bed Capacity
RM3		24	
RM4		24	
HBD	0.2	24	5
CSL	15.5	24	369
CSR	36.7	24	876
Subtotal	52.4		1,250
Pending			0
TOTAL			1,250

Lynden Emergency Housing Capacity

Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit	Acres Needed
58	1,250	1,192	2.43

Nooksack City & UGA

Nooksack City & UGA Permanent Housing

The City of Nooksack's initial land capacity analysis results showed substantial housing unit deficits in the low-income and moderate-income bands based on the developable areas available within the existing City and UGA. Housing growth projections through 2045 by Income Band have been addressed through proposed revisions in zoning code to support higher density residential development (reduced minimum lot sizes for multifamily development, up-zoning of specific non-floodplain parcels to the higher-density R-8600 zone, and increased maximum building heights), the inclusion of PUDs to support developer's innovation (e.g. Townhomes, Cottage Clustering), the addition of multifamily and mixed use in Nooksack's Central Market District and Commercial Zones (including Residential over Commercial), and elimination of separation requirements between multifamily developments - as well as the addition of development code supporting construction of accessory dwelling units. Nooksack is also considering opportunities for increasing low income and permanently supportive housing by adding these as enumerated permitted or conditional uses in the residential district. These revisions support Nooksack in satisfying the requirements of state housing initiatives and new legislation.

Based on the City's updated land capacity analysis results for the existing City and UGA, incorporation of the above changes into the zoning code would fully address the housing unit deficit in the low-income band; however, a 26.5-unit deficit would remain in the moderate-income band. One action that was considered to address this remaining deficit was to increase densities within the undeveloped floodplain areas of the City, but this approach was rejected to avoid putting more people at risk from flooding. To address the remaining deficit in the moderate-income housing band, the City has proposed to expand the UGA through addition of a 20-acre area that is located close to the Nooksack Elementary School, outside the floodplain and not within designated resource lands. The proposed zoning changes and addition of the UGA expansion area close to the Elementary School are necessary to fully address the previously identified low- and moderate-income band housing unit deficits. The remaining surplus in the high-income band is driven primarily by the unusually large number of pending units in that income band, which exceeds the corresponding housing need allocation. These pending units are predominantly made up of housing that has been constructed during the first three years of the 22-year planning period, plus housing units that are currently under construction and remaining lots in these recently recorded subdivisions.

Nooksack City & UGA Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/ Deficit
0-30 Non PSH	117.00	289.00	4.00	285.00	285.00	0.00
0-30 PSH	46.00					
30-50	98.00					
50-80	28.00					
80-100	23.00	56.00	0.00	56.00	56.50	0.50
100-120	33.00					
120+	88.00	88.00	121.00	-33.00	48.50	81.50
Total	433.00	433.00	125.00	308.00	390.00	82.00

Note: Total Additional Land Capacity does not include Pending Units

Nooksack City & UGA Emergency Housing

Nooksack Emergency Housing Capacity by Zone

Zone	Net Developable Residential Acres	Beds / Acre	Emergency Housing Bed Capacity
COM / CMD / LI <i>(w/Conditional Use)</i>	11.6	10	116
RESIDENTIAL Religious Institutions <i>(Gross Acres)</i>	4.0	4	16
Subtotal	15.6	8	132
Pending			0
TOTAL			132

Nooksack Emergency Housing Capacity

Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit	Acres Needed
89	132	43	8.90

Sumas City & UGA

Sumas City & UGA Permanent Housing

To increase densities within the existing City limits, the City of Sumas has made a number of changes to its zoning regulations. The City eliminated its Residential, Low Density zone and rezoned those properties to Residential, Medium Density, which allows for higher density development, including duplexes. The City also adopted an ordinance to allow construction of accessory dwelling units (ADUs) and removed barriers to construction of multifamily development in the Business, General zone. Our Residential, High Density zoning code regulations allow for all forms of housing which can accommodate all of the income brackets.

Even with these changes, the City Land Capacity Analysis still shows a deficit of 518 units in overall residential capacity in City Limits and the existing UGA. In the 0-80% AMI range, the City Land Capacity Analysis shows a deficit of 386 housing units. In the 120%+ AMI range, the City Land Capacity Analysis shows a deficit of 119 units, and a deficit of 13 units in the 80-120% AMI range.

To offset these deficits, the City has proposed an expansion of its UGA to the west of City Limits to gain access to developable areas outside the floodplain. The City previously considered, and ultimately rejected, options to further increase densities within City Limits, which would also increase densities in the FEMA 100-year floodplain. The table below shows the Land Capacity Analysis results with the proposed UGA added. These results show that the proposed UGA would provide a small surplus of 3 units in overall residential capacity.

Sumas City & UGA Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/ Deficit
0-30 Non PSH	174	429	2	427	428	1
0-30 PSH	68					
30-50	145					
50-80	42					
80-100	35	84	23	61	61	0
100-120	49					
120+	130	130	6	124	126	2
Total	643	643	31	612	615	3

Note: Total Additional Land Capacity does not include Pending Units

Sumas City & UGA Emergency Housing

Sumas Emergency Housing Capacity by Zone			
Zone	Net Developable Residential Acres	Beds / Acre	Emergency Housing Bed Capacity
Business General	5.9	10	59
Religious Institutions (Gross Acres)			0
Subtotal	5.9		59

Sumas Emergency Housing Capacity			
Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit	Acres Needed
10	59	49	1.00

Rural and Resource Lands

Rural and Resource Lands Permanent Housing

Rural and Resource Lands Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/ Deficit
0-30 Non PSH	0	0	0	0	0	0
0-30 PSH	0					
30-50	0					
50-80	731	731	0	731	736	5
80-100	145	286	0	286	286	0
100-120	141					
120+	2,589	2,589	0	2,589	5,016	2,427
Total	3,606	3,606	0	3,606	6,038	2,432

Note: Total Additional Land Capacity does not include Pending Units

Rural and Resource Lands Emergency Housing

Although there is larger theoretical capacity for emergency beds, Whatcom County Code 20.17.040 states " . . . the aggregate total of people in all temporary homeless facilities shall not exceed 100" in unincorporated areas. For purposes of this analysis, 45 of those 100 beds have been allocated to Rural and Resource Lands.

Rural & Resource Lands Emergency Housing Capacity by Zone

Zone	Net Developable Residential Acres	Beds / Acre	Emergency Housing Bed Capacity
			0
Religious Institutions (<i>Gross Acres</i>)	114.0	4.19	478
Subtotal	0.0		478
Pending			0
TOTAL			478

Rural & Resource Lands Emergency Housing Capacity

Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit	Acres Needed
45	45	0	10.74

Appendix A: Department of Commerce Housing Needs Analysis Checklist

The chart below documents how the *Whatcom County Comprehensive Plan Housing Needs Analysis* (Leland Consulting Group, 2025) satisfies the GMA Housing Element requirements from Exhibit 2 from the State Department of Commerce’s *Guidance for Updating Your Housing Element* (August 2023, Exhibit 2).

[illegible]

	Required / Recommended	Section / Figure / Page
Household Sizes		Figure 14, p. 16, Figure 15, p. 16
Household Types		
Household Tenure	Requirement	Figure 13, p. 15
Overcrowding Estimates		Figure 16, p. 17
Household Income & Cost Burden	Requirement	Figure 17, p. 18, Figure 18, p. 18, Figure 19, p. 19, Figure 20, p. 20, Figure 21, p. 20
Displacement Risk		Figure 22, p. 21, Figure 23, p. 23
Special Housing Needs		
Groups with Special Housing Needs	Recommendation	Figure 10, p. 12, Figure 25, p. 25, Figure 26, p. 26
Individuals / Families Experiencing Homelessness	Recommendation	Figure 27, p. 27, Figure 49, p. 43
Workforce Profile		
Local Workforce Characteristics		Local Workforce Characteristics, p. 27

	Required / Recommended	Section / Figure / Page
Jobs to Housing Ratio	Recommendation	Jobs to Housing Ratio, p. 33
Employment Trends & Projections	Recommendation	Employment Trends & Projections, p. 34
Housing Supply		
General Housing Inventory		
Unit Count by Type	Requirement	Figure 38, p. 36, Figure 39, p. 37
Size (Bedrooms)	Requirement	Figure 51, p. 46
Housing Market Conditions		
Housing development trends		Housing Market Conditions, p. 37
Sales Prices	Recommendation	Figure 44, p. 40
Rental Rates	Recommendation	Figure 43, p. 41
Vacancy Rate		Figure 42, p. 40
Housing Condition		Figure 46, p. 42
Housing Production		Figure 40, p. 38, Figure 41, p. 39
Housing Affordability	Recommendation	Gap Analysis, p. 44
Special Housing Inventory		
Subsidized / Public Housing Units	Requirement	Figure 47, p. 42
Group Homes / Care Facilities	Requirement	Figure 48, p. 43
Housing for Homeless Individuals	Recommendation	Figure 48, p. 43
Gap Analysis		
Quantity of housing units available to various income brackets	Requirement	Gap Analysis, p. 44, Land Capacity Analysis, p. 52

	Required / Recommended	Section / Figure / Page
Alignment of household size to housing unit sizes	Recommendation	Figure 52, p. 44
Units needed for special demographic groups	Recommendation	Figure 64, p. 51
Projection of future housing demand	Requirement	Figure 64, p. 51
Land Capacity Analysis		
Land available to meet housing unit demand	Requirement	Land Capacity Analysis, p. 52
Land available to meet special housing needs	Recommendation	Land Capacity Analysis, p. 52

Appendix J Subsidized Housing Needs and Funding

Affordable Housing Funding Gap for the Birch Bay and Columbia Valley UGAs¹

As a result of the Final Decision and Order of the Washington State Growth Management Hearings Board Case No. 25-3-0003 (*Futurewise, Kian Bradley, and Trevor Reed, Petitioners v. City of Mercer Island, Respondent* – August 1, 2025), the Washington Department of Commerce's document entitled "Considerations Regarding New GMHB Housing Cases", posted on the Department of Commerce Website in November 2025, suggests that jurisdictions provide additional analysis of funding gaps and quantify potential needed subsidy to meet their affordable/subsidized unit targets as part of the Adequate Provisions analyses required by RCW 36.70A.070(2) in their comprehensive plans. This analysis considers the targets for units available to households earning under 80 percent of the Area Median Income (AMI) in Whatcom County's two unincorporated Urban Growth Areas (UGAs) – Birch Bay and Columbia Valley. The Department of Commerce, in its *Guidance for Updating Your Housing Element (v.3.4)*, estimates that, as of 2022, the cost of developing a subsidized unit in Whatcom County would be \$475,118. For this analysis, Leland Consulting Group assumed that the cost per unit would increase by 2.5 percent annually due to inflation. Applying this to the combined housing targets for Birch Bay and Columbia Valley shows a need for **\$556.65 million** in subsidy for construction of affordable housing units over the planning horizon, or **\$25.30 million** per year. However, it is particularly likely that the lower-income units will need to be subsidized, and it is possible that some smaller market-rate units could meet the need in the 50-80% category. This analysis assumes that subsidies are needed for the following percentage of units in each income category:

- 0-30% Area Median Income (Permanent Supportive Housing (PSH) and non-Permanent Supportive Housing (non-PSH)): 100% of the units
- 30-50% Area Median Income: 100% of the units
- 50-80% Area Median Income: 53% of the units

¹ The Affordable Housing Funding Gap for Birch Bay and Columbia Valley UGAs section of Appendix J is based upon a memo from Leland Consulting Group dated March 30, 2026.

The Washington State Department of Commerce's *Guidance for Updating your Housing Element* (August 2024) states on p. 61 that all units serving income bands under 50 percent AMI should be counted in this analysis, and a portion of 50-80 percent AMI at the discretion of jurisdictions. In Whatcom County, 53 percent of households earning 50-80 percent AMI experience some level of cost-burden (meaning they pay more than 30 percent of their income in housing costs). Therefore, this share of units was used to estimate units requiring subsidy for this analysis. The estimated subsidy needed is shown for each income band below for the 22-year planning period between 2023-2045:

Figure 1. Subsidy Gap Analysis for Birch Bay and Columbia Valley

	Income Band (as a % of Area Median Income)				Total
	0-30% non-PSH*	0-30% PSH*	>30-50%	>50-80%	
Birch Bay UGA Units	244	103	216	36	599
Columbia Valley UGA Units	95	46	92	18	251
Total Units Needed	339	149	308	54	850
Approx. Units per Year	15.41	6.77	14.00	2.45	38.64
2022 Cost per Unit	\$ 475,118	\$ 475,118	\$ 475,118	\$ 475,118	\$ 475,118
Inflation Rate	2.5%	2.5%	2.5%	2.5%	2.5%
Avg. Cost per Unit	\$ 654,886	\$ 654,886	\$ 654,886	\$ 654,886	\$ 654,886
Total Subsidy Needed	\$ 222,006,487	\$ 97,578,073	\$ 201,705,009	\$ 35,363,865	\$ 556,653,434
Annual Subsidy Needed	\$ 10,091,204	\$ 4,435,367	\$ 9,168,410	\$ 1,607,448	\$ 25,302,429

The Whatcom County Health & Community Services Department and the Bellingham & Whatcom County Housing Authorities indicated in emails dated December 4, 2025 that they are not aware of local, state or federal funding going towards construction of affordable housing in the Birch Bay UGA or Columbia Valley UGA in the last 10-years.

Local Option Tools for Addressing Affordable Housing Funding Gaps

The checklist below is from the Washington State Department of Commerce's *Guidance for Updating your Housing Element* (August 2024). It is intended to identify tools that local governments can consider to address funding gaps for affordable housing.

Figure 2. Checklist for Local Option Tools for Addressing Affordable Housing Funding Gaps

Local option tools for addressing affordable housing funding gaps*	Implementation status	Plans for implementation
Housing and related services sales tax (RCW 82.14.530)	Implemented - Fund 133 - Affordable Housing, Behavior Health Facilities and Related Services Programs Fund - Established in 2021 and added new chapter (3.47) to Whatcom County Code	N/A
Affordable housing property tax levy (RCW 84.52.105)	Not implemented	None
REET 2 (RCW 82.46.035) – GMA jurisdictions only and only available through 2025 NOTE: This is to address housing: "Until January 1, 2026, planning, acquisition, construction, reconstruction, repair, replacement, rehabilitation, or improvement of facilities for those experiencing homelessness and affordable housing projects." This does not relate to other REET funds.	Not implemented for housing uses.	N/A
Affordable Housing Sales Tax Credit (RCW 82.14.540) – was only available to jurisdictions through July 2020	Implemented - Fund 129- Affordable & Supportive Housing Fund. Established in 2019 to receive an additional tax distribution from the state sales and use tax, to be used for affordable and supportive housing.	N/A
Lodging Tax (RCW 67.28.150 and RCW 67.28.160) to repay general obligation bonds or revenue bonds	Not implemented	None

Local option tools for addressing affordable housing funding gaps*	Implementation status	Plans for implementation
Mental Illness and Drug Dependency Tax (RCW 82.14.460) – jurisdictions with a population over 30,000	Implemented - Fund 124 - Behavioral Health Program Fund. Established in 2008 to impose a sales and use tax for the purpose of providing new or expanded chemical dependency or mental health treatment services	N/A
Donating surplus public lands for affordable housing projects (RCW 39.33.015)	County partnered with community based agencies for an affordable housing project at Laurel & Forest and a shelter project at the Way Station. Though this specific statute may not have been the tool utilized, each project represented significant commitment of county owned-property and capital.	Ongoing
Impact fee waivers for affordable housing projects (RCW 82.02.060)	N/A - Whatcom County does not have impact fees	N/A
Application fee waivers or other benefits for affordable housing projects (RCW 36.70A.540)	Not implemented	None
Multifamily Tax Exemption (MFTE) with affordable housing requirement (RCW 84.14)	<u>Not</u> implemented in unincorporated Whatcom County	N/A
General funds (including levy lid lifts to increase funds available)	Implemented - Healthy Children Fund - 145. Passing funds through to local nonprofits to provide services including homelessness services.	N/A
Sales and Use Tax for Public Facilities in Rural Counties (Housing authorization under RCW 82.14.370)	Implemented with annual application cycles for affordable housing projects.	N/A

* See MRSC's summary of [Affordable Housing Funding Sources](#) for more details.

Whatcom County Comprehensive Plan

Appendix K

Adequate Provisions Checklists

The checklists in this document comprise “Exhibits B1 through B4” of “[Appendix B: Adequate Provisions Checklists](#)” from the Washington State Department of Commerce’s “[Guidance for Updating Your Housing Element](#)”, updated January 2026. The purpose of this checklist is to document barriers and actions to achieve housing availability in accordance with RCW [36.70A.070](#)(2)(d) codified under the Washington State Growth Management Act (GMA), while meeting digital accessibility requirements pursuant to ADA Title II/WCAG 2.1 Level AA standards.

Moderate Density, Low-Rise, and Mid-Rise Housing Barrier

Review Checklist ([Exhibits B1 & B2](#))

A. Development Regulations

Barrier #1: Unclear Development Regulations

Is This Barrier Likely to Affect Housing Production (Yes or No)?

Yes.

Why or Why Not? (Provide Evidence)

Whatcom County Planning and Development Services (PDS) has heard from the development community that zoning regulations, in general, are difficult to interpret and/or interpreted differently by different parties.

Action Needed to Address Barrier

Under the [2025-2026 Biennial Budget](#) adopted by the County Council on December 2, 2025, \$150,000 was allocated for a "Development Code Review & Update"(pg. 7). Additionally, PDS is proposing code amendments to implement the updated Goal & Policies of the 2025-26 Comprehensive Plan periodic update and measures identified in this checklist, requiring urgent and ongoing extensive consultation with the development community for their assistance in Code review and update.

Barrier #2: Prohibiting Some Moderate Density Housing Types, such as:

- Duplexes
- Triplexes
- Four/five/six-plexes
- Townhomes
- Cottage housing
- Live-work units
- Manufactured home parks

Is This Barrier Likely to Affect Housing Production (Yes or No)?

Yes.

Why or Why Not? (Provide Evidence)

Some forms of Middle Housing, as defined in RCW [36.70A.030](#)(28), are not permitted in all zoning districts that allow for residential uses within UGAs. Below is a list of said districts, specifying which forms of Middle Housing are currently allowed:

Urban Residential (UR) - WCC 20.20

- Single-Family Attached (Permitted Use)

Urban Residential Medium (URM) – WCC 20.22

- Single-Family Attached (Permitted Use)
- Duplexes (Permitted Use)
- Multifamily Dwellings (Permitted Use)
- Mobile Home Park (Conditional Use)

Urban Residential-Mixed (UR-MX) – WCC 20.24

- Single-Family Attached (Permitted Use)
- Duplexes (Administrative or Conditional Use depending on proposal)
- Multifamily Dwellings (Administrative or Conditional Use depending on proposal)
- Mobile Home Parks (Conditional Use)

General Commercial (GC) – WCC 20.62

- Single-Family Attached (Permitted Use)
- Duplex (Permitted Use)
- Multifamily Dwellings (Permitted Use)

Resort Commercial (RC) – WCC 20.64

- Duplex (Permitted Use)
- Multifamily Dwellings (Permitted Use)
- Mobile Home Parks (Conditional Use)

Small Town Commercial (STC) – WCC 20.61

- Duplexes (Permitted)

NOTES:

- The definition of "Mobile Home Parks" includes Manufactured Home Parks - WCC 20.97.130.
- The definition of "Multifamily Dwellings" includes Triplexes and Fourplexes - WCC 20.97.130.
- The definition of "Single-Family Attached Dwellings" includes Townhouses- WCC 20.97.190.

Action Needed to Address Barrier

The following are proposed code amendments, as part of the 2025-26 periodic update, relating to Middle Housing:

1. Allowance of Duplexes, Triplexes, & Fourplexes as a "Permitted" use in the three "urban" (UR, URM & UR-MX) zones, where not currently allowed, all of which are located within UGAs, limited to a maximum of 4 units per lot, subject to the underlying zoning of the district, & when served by public water, sewer, and stormwater management facilities.

2. Allowance of Mobile Home Parks in the UR zone, to match allowance in the URM & UR-MX zoning districts, as an "Administrative" use, subject to current development regulations for Mobile Home Parks.
3. Allowance of Duplexes, Triplexes, and Fourplexes in the Residential Rural-2 (RR-2), Residential Rural-3 (RR-3) zoning districts, in areas designated under the Comprehensive Plan as "Rural Community", restricting to Limited Areas of More Intensive Rural Development (LAMIRDs), with a maximum of 4 dwelling units per lot, subject to the underlying zoning of the district, and when served by public water, sewer, and stormwater management facilities.
4. Allowance of Triplexes and Fourplexes in the Small Town Commercial (STC) zoning district, in areas designated under the Comprehensive Plan as "Rural Community", restricting to Limited Areas of More Intensive Rural Development (LAMIRDs), with a maximum of 4 dwelling units per lot, subject to the underlying zoning of the district, and when served by public water, sewer, and stormwater management facilities.

Summary of Proposed New Middle Housing Types by Zone (Subject to Requirements Above):

Urban Residential (UR) - WCC 20.20

- Allow Duplexes (Permitted Use)
- Allow Triplexes (Permitted Use)
- Allow Fourplexes (Permitted Use)
- Allow Mobile Home Parks (Administrative Use)

Residential Rural (RR) – RR-2 & RR-3 & LAMIRDs ONLY - WCC 20.32

- Allow Duplexes (Permitted Use)
- Allow Triplexes (Permitted Use)
- Allow Fourplexes (Permitted Use)

Small Town Commercial (STC) – LAMIRDs ONLY - WCC 20.32

- Allow Triplexes (Permitted Use)
- Allow Fourplexes (Permitted Use)

NOTES:

- Live-Work Units can be permitted within UGAs through the Planned Unit Development (PUD) process authorized by a Conditional Use Permit.

Barrier #3: High Minimum Lot Sizes

Is This Barrier Likely to Affect Housing Production (Yes or No)?

No.

Why or Why Not? (Provide Evidence)

In the UR, URM, and UR-MX zoning districts, where public utility services are available, minimum lot sizes are typically low, ranging from 2,000 to 4,500 sf, with the exception of a minimum lot size of 12,000 sf in the UR-3 zoning district near the Bellingham International Airport.

In the RC zone, the minimum lot size for duplexes is 6,000 sf; for multifamily dwellings, 8,000 sf, with a minimum of 2,000 sf per unit; and for mobile home parks, 3,000 square feet per unit.

The GC zone is the least restrictive, as it has no set minimum lot size. The requirement states, “minimum lot size shall be consistent with the area required to meet the building setback, lot coverage, and development standards of this district.”

Action Needed to Address Barrier

None identified at this time.

Barrier #4: Low Maximum Densities or Low Maximum Floor Area Ratio (FAR)

Is This Barrier Likely to Affect Housing Production (Yes or No)?

No.

Why or Why Not? (Provide Evidence)

In the UR, URM, and UR-MX zoning districts, where public utility services are available, densities range from 3 dwelling units (du)/acre to 12 du/acre; with the exception of the URM zoning district, which can allow up to 24 du/acre (with transfer of development rights).

In the RC zone, where public utility services are available, densities range from 7 to 22 du/acre.

In the GC zone, densities range from 7 to 18 du/acre.

Required densities for zoning districts within UGAs that allow residential development are similar to those required in other Counties within UGAs, as detailed below.

For residential zones within Snohomish County’s UGAs, the minimum net density is 6 du/acre; [see code section 30.21.025\(1\)\(a\) linked here](#).

Thurston County’s density requirements for UGAs are similar, requiring a minimum of 6 du/acre with a maximum of 12 du/acre in their “Moderate Density Residential District” in the Lacey UGA; [see code section 21.15.020.A.1 linked here](#).

King County’s density standards for urban residential zones widely vary from 1 du/are (for lands with environmental constraints) to 48 du/acre (for lands in and next to established mixed-use areas); [as cited within code section 21A.04.080 linked here](#). King County’s 2024 Comprehensive Plan “Growth Targets and the Urban Growth Area” report noted, “98 percent of residential development was over four dwelling units per acre”; [see page 11 of the report linked here](#).

Action Needed to Address Barrier

None identified at this time.

Barrier #5: Low Maximum Building Heights

Is This Barrier Likely to Affect Housing Production (Yes or No)?

No.

Why or Why Not? (Provide Evidence)

In the UR, URM, UR-MX, GC, and RC zones, the maximum height limits range from 35 to 45 feet, accommodating 3 to 4-story structures (low- to mid-rise developments). With a Conditional Use Permit, the height in the RC zone can be extended up to 75 feet.

Action Needed to Address Barrier

None identified at this time.

Barrier #6: Large Setback RequirementsIs This Barrier Likely to Affect Housing Production (Yes or No)?

Yes.

Why or Why Not? (Provide Evidence)

Setbacks are determined by the road classifications given by the Public Works Department. Usually, the higher the classification, the greater the setback.

Within urban zones (UR, URM, UR-MX), front setback requirements range from 10 feet in the UR-MX zone and 20 feet in UR/URM zones (adjacent to Minor/Local Access Streets) to 45 feet (adjacent to Interstates, Highways, and Arterials).

The side and rear yard setback requirements are usually 5 feet, except when next to the Rural Forestry (RF) zone, which necessitates a 100-foot buffer.

Action Needed to Address Barrier

As part of the 2025-2026 periodic update, PDS proposes reducing the front setback requirement for the UR & URM zoning districts from 20' to 10' (adjacent to Minor/Local Access Streets) to align with the UR-MX zoning district standard. PDS sought input from Public Works Engineering on the proposal. In an email dated April 15, 2026, the Department stated it had no concerns about the proposal.

Barrier #7: High Off-Street Parking RequirementsIs This Barrier Likely to Affect Housing Production (Yes or No)?

Yes.

Why or Why Not? (Provide Evidence)

Whatcom County requires a minimum parking stall size of 9 feet by 18 feet for conventional stalls and allows 8 feet by 15 feet for compact stalls. Below is a list of current parking stall requirements for residential uses:

Accessory dwelling unit:

- 2 for each unit, except: For lots smaller than 6,000 square feet, and located within a UGA, 1 parking stall per unit is required; this exception does not apply to the Lake Whatcom Watershed Overlay District.

Apartments:

- 3 for every 2 units.

Co-living:

- 0.25 off-street parking spaces are required per sleeping unit.

Duplexes:

- 2 for each unit, plus for any duplex development of more than 4 units within a UGA or LAMIRD: 1 overflow space for every 2 units.

Mobile homes:

- 2 for each unit.

Multifamily dwelling:

- 3 for every 2 units, plus for any multifamily development of more than 4 units within a UGA or LAMIRD: 1 overflow space for every 2 units.

Single-family dwelling (except accessory dwelling units):

- 2 for each unit, plus for any single-family development of more than 4 units within a UGA or LAMIRD: 1 overflow space for every 2 units.

These parking requirements are high for urban areas, given that many jurisdictions in the State are considering eliminating all residential off-street parking requirements, including the City of Bellingham.

Action Needed to Address Barrier

As part of the 2025-2026 periodic update, PDS has already addressed required parking standards for Accessory Dwelling Units ([RCW 36.70A.681](#)) and Co-Living Housing ([RCW 36.70A.535](#)).

Also, under the 2025-2026 periodic update, PDS is proposing updated residential parking regulations to comply with Senate Bill 6015, relaxing residential off-street parking standards to promote more residential development, codified in [RCW 36.70A.622](#). Proposal includes:

1. Reducing the minimum parking stall width from nine (9) feet to eight (8) feet.
2. Allowing for grass block pavers for all residential development projects.
3. Allow up to six (6) parking spaces in legally nonconforming gravel parking areas to count toward the minimum number of parking stalls required for a residential development.
4. Remove limitations on locational requirements for parking in the front yard setback, to explicitly allow tandem parking.

Whatcom County will be further amending its off-street residential parking standards, after completion of the Comprehensive Plan, as adoption is not required to be concurrent with the periodic update, to comply with:

- [RCW 36.70A.817](#)/HB 1183 (Off-Street Parking Requirements for Residential Projects);
- [RCW 36.70A.842](#)/SB 1491 (Transit-oriented development—Off-street parking); and
- [RCW 36.01.397](#)/SB 5184 (Minimum parking requirements).

Barrier #8: High Impervious Coverage Limits**Is This Barrier Likely to Affect Housing Production (Yes or No)?**

No.

Why or Why Not? (Provide Evidence)

Whatcom County's definition of Lot Coverage only applies to the area covered by structures/buildings, not all impervious surfaces. As such, PDS has found that lot coverage requirements have not posed a barrier to housing production.

Within the UR, URM, and UR-MX zoning districts, lot coverage standards range from a maximum of 2,500 sf/35% of the lot area to 40%, whichever is greater.

The URM zoning district also includes an open space requirement of 20% for Multifamily Dwellings and 40% for Mobile Home Parks. These are relatively low, and PDS has not encountered them as barriers in past proposals.

Within the GC zoning district, maximum lot coverage is 30%, with at least 10% of the site shall be kept free of buildings, structures, hard surfacing, parking areas, and other impervious surfaces.

Within the RC zoning district, lot coverage for residential uses shall not exceed 35 percent of the parcel.

Action Needed to Address Barrier

None identified at this time.

Barrier #9: Lack of Alignment Between Building Codes & Development Codes

Is This Barrier Likely to Affect Housing Production (Yes or No)?

No.

Why or Why Not? (Provide Evidence)

There does not appear to be a lack of alignment between building and development codes.

Action Needed to Address Barrier

None identified at this time. However, Whatcom County is currently operating under the 2021 International Building Code and plans to adopt the 2024 Code in 2026 as required by State law.

Barrier #10: Other (for example: complex design standards, tree retention regulations, historic preservation requirements).

Is This Barrier Likely to Affect Housing Production (Yes or No)?

Yes.

Why or Why Not? (Provide Evidence)

In reviewing development regulations for Middle Housing types in zones within UGAs, PDS identified several barriers to the construction of Middle Housing types within the UR-MX zoning codified in WCC [20.24.132](#).

Barriers include a requirement to hold a neighborhood meeting, the permit pathway for the proposal depending on an evaluation of the surrounding neighborhood density, open space restriction specifically for Middle Housing types, and the order in which housing types may be constructed on site.

Action Needed to Address Barrier

As part of the periodic update, PDS proposes removing the referenced restrictions for housing developments in the UR-MX zoning district codified in WCC [20.24.132](#).

B. Process Obstacles

Barrier #1: Conditional Use Permit Process

Is This Barrier Likely to Affect Housing Production (Yes or No)?

Yes.

Why or Why Not? (Provide Evidence)

Some forms of Middle Housing, as defined in RCW [36.70A.030](#)(28), are classified as "Conditional" uses within UGAs, a barrier that could affect housing production because of associated process requirements, such as increased permitting costs and extended processing timelines, since a public hearing is required for all "Conditional" uses.

Action Needed to Address Barrier

As part of the 2025-2026 periodic update, PDS is proposing to recategorize Middle Housing types to address regulatory barriers as follows:

Urban Residential Medium (URM) - WCC 20.22

- Recategorize Mobile Home Parks from "Conditional" use to "Administrative" use.

Urban Residential Mixed (UR-MX) – WCC 20.24

- Recategorize Duplexes from "Administrative/Conditional" use to "Permitted" use.
- Recategorize Triplexes from "Administrative/Conditional" use to "Permitted" use.
- Recategorize Fourplexes from "Administrative/Conditional" use to "Permitted" use.
- Recategorize Mobile Home Parks from "Conditional" use to "Administrative" use.

Resort Commercial (RC) – WCC 20.64

- Recategorize Duplexes from "Conditional" use to "Permitted" use.
- Recategorize Triplexes from "Conditional" use to "Permitted" use.
- Recategorize Fourplexes from "Conditional" use to "Permitted" use.
- Recategorize Mobile Home Parks from "Conditional" use to "Administrative" use.

Barrier #2: Design ReviewIs This Barrier Likely to Affect Housing Production (Yes or No)?

No.

Why or Why Not? (Provide Evidence)

Whatcom County does not have design regulations for residential buildings.

Action Needed to Address Barrier

None identified at this time.

Barrier #3: Lack of Clear and Accessible Information about Processes and FeesIs This Barrier Likely to Affect Housing Production (Yes or No)?

Yes .

Why or Why Not? (Provide Evidence)

In 2024, PDS hired its first Communication Specialist to improve internal and external communication regarding development regulations and the permitting process. PDS also met SB 5290 requirements by updating permit review processes in 2024.

Both of these measures have led to several improvements that clarify permitting processes and fees, including:

- Updating and publishing the [PDS Administrative Manual](#) online, which includes detailed instructions for submittal of each type of land use application.
- Creation of complementary "Guides" to the new Administrative Manual, which list and link the requirements for each application type.
- Update of PDS webpages, including creation of a new [permitting webpage](#), that includes all Applications, Forms, & Guides in the same location; as well as links to required documents from other Departments.
- In spite of these efforts, there is still room for improvement in communication on permit processes and fees.

Action Needed to Address Barrier

- Increase outreach to stakeholder groups and the public, and train staff to increase efficiency and consistency in staff communication to customers.

Barrier #4: Permit Fees, Impact Fees & Utility Connection Fees

Is This Barrier Likely to Affect Housing Production (Yes or No)?

Yes.

Why or Why Not? (Provide Evidence)

- PDS permitting fees, in general, are low compared to those in comparable counties in Washington state. In 2024, PDS conducted a fee comparison for land use and building permit applications, comparing Whatcom County's rates with those of Benton, Yakima, Skagit, Kitsap & Thurston counties. PDS found that permit fees for land use applications were substantially lower than those in other counties of comparable size and services offered. In addition, building permit fees are based on the valuation of the proposed structure. Lastly, PDS does not charge development impact fees.
- However, PDS does not exempt or reduce permit fees for affordable housing developments.

Action Needed to Address Barrier

- Increase in permit fees could win community support, if it results in faster and more reliable permit issuance.
- The County could also create a permit fee exemption or reduction for qualified affordable housing developments.
- Conduct a fee study and update fee schedule to collect reasonable and sufficient fees to cover the cost of processing permits, enabling investment in staff and administrative infrastructure necessary to improve permit processes and timelines.

- Consider implementing impact fees to defray the costs of infrastructure and service improvements required by development in areas under county jurisdiction as allowed by state law.

Barrier #5: Processing Times and Staffing Challenges

Is This Barrier Likely to Affect Housing Production (Yes or No)?

Yes.

Why or Why Not? (Provide Evidence)

Following the 2008 recession, PDS lost approximately 30% of its workforce. Due to funding shortages, these positions have never been replaced despite a substantial increase in population, and additional duties have been assigned to the Department without additional staff and/or funding.

This has resulted in a negative effect on permit processing timelines despite being technically fully staffed. In addition, several positions have been unbudgeted, frozen, or unfulfilled due to budgetary constraints.

[This information was presented at the March 10, 2026, County Council Planning and Development Meeting. See slide number nine \(9\) of the presentation linked here.](#)

Action Needed to Address Barrier

- Fulfillment of the five (5) identified positions from [PDS's March 10, 2026, presentation to County Council, linked here](#), and evaluation of other needed positions in conjunction with the County Council and the Executive's Office.
- Increase in permit fees could win community support, if it results in faster and more reliable permit issuance.

Barrier #6: SEPA Process

Is This Barrier Likely to Affect Housing Production (Yes or No)?

No.

Why or Why Not? (Provide Evidence)

Whatcom County SEPA regulations are codified in WCC 16.08 and adopt by reference the standards of the State Environmental Policy Act (SEPA), [RCW 43.21C.120](#), and the Washington Administrative Code (WAC), SEPA rules, WAC 197-11-904.

Action Needed to Address Barrier

None identified at this time.

C. Limited Land Availability and Environmental Constraints

Barrier #1: Lack of Large Parcels for Infill Development

Is This Barrier Likely to Affect Housing Production (Yes or No)?

Yes.

Why or Why Not? (Provide Evidence)

PDS has heard from the development community that there is a shortage of large, undeveloped parcels not affected by critical areas, as regulated under the Whatcom County Critical Areas Ordinance (CAO), codified in WCC 16.16.

Action Needed to Address Barrier

Whatcom County is researching the establishment of a Mitigation Bank that could be used for residential development projects rather than requiring on-site mitigation for impacts to critical areas.

Barrier #2: Environmental ConstraintsIs This Barrier Likely to Affect Housing Production (Yes or No)?

Yes.

Why or Why Not? (Provide Evidence)

- Regulated critical areas exist countywide, including within UGAs. Mitigation often requires the conversion of large areas of nearby farmland, pushing future housing further away from urban areas.
- Public mitigation banks are difficult to establish in less than 10 years in Washington State, compared to 2 years elsewhere e.g. the State of Virginia.

Action Needed to Address Barrier

- Whatcom County is researching off-site mitigation options, including the creation of a Mitigation Bank and implementation of in-lieu fees to address environmental constraints associated with development. Whatcom County also plans to evaluate UGA Reserve boundaries, in association with the Cities, in 2026-2027.
- As part of the periodic update, PDS proposes upzoning other suitable areas in the County to address this barrier to housing.

Barrier #3: Infrastructure Investments in Underserved AreasIs This Barrier Likely to Affect Housing Production (Yes or No)?

Yes.

Why or Why Not? (Provide Evidence)

Whatcom County itself is not a provider of utility infrastructure. However, in general, the cost of extending infrastructure to incorporated UGAs is a barrier to housing production. As such, Whatcom County has only three Limited Areas of More Intensive Rural Development (LAMIRDS) with public sewer service available: Sandy Point, Sudden Valley, and Lake Samish.

In 2026, the Washington State legislature passed [House Bill 2269](#), updating utility service requirements for Middle Housing types within LAMIRDS codified in the GMA under [RCW 36.70A.536](#); effective June 11, 2026.

As part of the update, all forms of Middle Housing in LAMIRDS are now required to be served by “a publicly owned sanitary sewer system,” a.k.a. public sewer service.

Development of several duplex projects has occurred within the Small Town Commercial zoning district, which has historically allowed duplexes served by on-site sewage systems, in the Hinote’s Corner

LAMIRD. PDS has also received frequent interest in developing Middle Housing types in other LAMIRDs, such as Deming and Kendall.

With this change in State law, opportunities to develop Middle Housing types are no longer available in counties that lack public sewer service in most of their LAMIRDs.

Action Needed to Address Barrier

Potential use of EDI funds to subsidize utility extension or a change in State law to remediate issues with the lack of public utility services within LAMIRDs.

Supplementary Barrier Review Checklist for Permanent Supportive Housing (PSH) & Emergency Housing ([Exhibit B3](#))

A. Development Regulations

Barrier #1: Spacing Requirements (for example, minimum distances from parks, schools, or other emergency/PSH facilities)

Is This Barrier Likely to Affect Housing Production (Yes or No)?

N/A

Why or Why Not? (Provide Evidence)

This requirement is associated with RCW [35A.21.430](#), which does not apply to Counties.

Action Needed to Address Barrier

None identified at this time.

Barrier #2: Parking Requirements

Is This Barrier Likely to Affect Housing Production (Yes or No)?

No.

Why or Why Not? (Provide Evidence)

- The Whatcom County Code does not appear to include any development standards for Permanent Supportive Housing that differ from those for other housing types.
- Emergency Housing is considered a “Temporary Homeless Facility” and regulated under WCC 20.17.

“Temporary Homeless Facilities” are not mentioned under the standard parking regulations of WCC [20.80.500](#). The only specific parking requirements for the use are found in WCC [20.17.060](#)(7), which mandates onsite parking to meet the sponsor's needs but does not specify a set number of parking stalls. It also allows flexibility by not requiring onsite parking if sufficient off-site parking is available. As such, parking requirements are handled on a case-by-case basis, and final determination is left up to the Director under WCC [20.80.590](#).

Action Needed to Address Barrier

None identified at this time.

Barrier #3: On-Site Recreation and Open Space Requirements

Is This Barrier Likely to Affect Housing Production (Yes or No)?

No.

Why or Why Not? (Provide Evidence)

- The Whatcom County Code does not appear to include any development standards for Permanent Supportive Housing that differ from those for other housing types.

- Emergency Housing is considered a “Temporary Homeless Facility” and regulated under WCC 20.17. There are no on-site recreation and open space requirements for "Temporary Homeless Facilities".

Action Needed to Address Barrier

None identified at this time

Barrier #4: Restrictions on Support Spaces, such as Office Space, within a Transitional or PSH Building in a Residential Zone.

Is This Barrier Likely to Affect Housing Production (Yes or No)?

No.

Why or Why Not? (Provide Evidence)

- The Whatcom County Code does not appear to include any development standards for Permanent Supportive Housing that differ from those for other housing types.
- Emergency Housing is considered a “Temporary Homeless Facility” and regulated under WCC 20.17. There are no restrictions on support/office spaces associated with "Temporary Homeless Facilities" under WCC [20.17](#).

Action Needed to Address Barrier

None identified at this time.

Barrier #5: Arbitrary limits on the number of occupants (in conflict with RCW 35A.21.314).

Is This Barrier Likely to Affect Housing Production (Yes or No)?

N/A

Why or Why Not? (Provide Evidence)

RCW [35A.21.430](#) does not apply to Counties.

Action Needed to Address Barrier

None identified at this time.

Barrier #6: Requirements for PSH or emergency housing that are different than the requirements imposed on housing developments generally (in conflict with RCW 36.130.020).

Is This Barrier Likely to Affect Housing Production (Yes or No)?

No.

Why or Why Not? (Provide Evidence)

- The Whatcom County Code does not appear to include any development standards for Permanent Supportive Housing that differ from those for other housing types.
- Emergency Housing is considered a “Temporary Homeless Facility” and regulated under WCC 20.17.

Action Needed to Address Barrier

None identified at this time.

Barrier #7: Other Restrictions Specific to Emergency Shelters, Emergency Housing, Transitional Housing, & PSH.

Is This Barrier Likely to Affect Housing Production (Yes or No)?

No.

Why or Why Not? (Provide Evidence)

Temporary Homeless Facilities" standards codified in WCC 20.17 were amended in 2021 under Ordinance Number 2021-055 to comply with RCW [36.01.290](#) (Hosting the homeless by religious organizations). The requirements of RCW [35A.21.430](#) do not apply to Counties.

Action Needed to Address Barrier

None identified at this time.

Accessory Dwelling Unit Barrier Review Checklist [\(Exhibit B4\)](#)

A. Development Regulations

Barrier #1: Consistency with House Bill 1337 (2023):

- Must allow two ADUs on each lot in urban growth areas;
- May not require the owner to occupy the property, and may not prohibit sale as independent units, but may restrict the use of ADUs as short-term rentals;
- Must allow an ADU of at least 1,000 square feet;
- Must set parking requirements based on distance from transit and lot size;
- May not charge more than 50% of the impact fees charged for the principal unit;
- Must permit ADUs in structures detached from the principal unit;
- May not restrict roof heights of ADUs to less than 24 feet, unless that limitation applies to the principal unit;
- May not impose setback requirements, yard coverage limits, tree retention mandates, restrictions on entry door locations, aesthetic requirements, or requirements for design review for ADUs that are more restrictive than those for principal units;
- Must allow an ADU on any lot that meets the minimum lot size required for the principal unit;
- Must allow detached ADUs to be sited at a lot line if the lot line abuts a public alley, unless the city or county routinely plows snow on the public alley;
- Must allow conversions from existing structures, even if they violate current code requirements for setbacks or lot coverage; and
- May not require public street improvements as a condition of permitting ADUs.

Is This Barrier Likely to Affect Housing Production (Yes or No)?

No.

Why or Why Not? (Provide Evidence)

Whatcom County adopted Ordinance Number 2025-060, updating applicable development regulations under WCC 20.80.910 to comply with the requirements of [House Bill 1337/RCW 36.70A.680/.681/.682](#).

Action Needed to Address Barrier

PDS plans to update its ADU definition as part of the 2025-2026 periodic update to comply with the updated definition under RCW [36.70A.696](#).

Barrier #2: Unclear Development Regulations

Is This Barrier Likely to Affect Housing Production (Yes or No)?

No.

Why or Why Not? (Provide Evidence)

Whatcom County adopted Ordinance Number 2025-060, updating applicable development regulations under WCC 20.80.910 to comply with the requirements of [House Bill 1337/RCW 36.70A.680/.681/.682](#).

Action Needed to Address Barrier

None identified at this time.

Barrier #3: Large Setback RequirementsIs This Barrier Likely to Affect Housing Production (Yes or No)?

No.

Why or Why Not? (Provide Evidence)

Whatcom County adopted Ordinance Number 2025-060, updating applicable development regulations under WCC 20.80.910 to comply with the requirements of [House Bill 1337](#)/RCW [36.70A.680/.681/.682](#).

Action Needed to Address Barrier

None identified at this time.

Barrier #4: Off-Street Parking RequirementsIs This Barrier Likely to Affect Housing Production (Yes or No)?

No.

Why or Why Not? (Provide Evidence)

Whatcom County adopted Ordinance Number 2025-060, updating applicable development regulations under WCC 20.80.910 to comply with the requirements of [House Bill 1337](#)/RCW [36.70A.680/.681/.682](#).

Action Needed to Address Barrier

None identified at this time.

Barrier #5: Other (for example: burdensome design standards, tree retention regulations, historic preservation requirements, open space requirements, etc.)Is This Barrier Likely to Affect Housing Production (Yes or No)?

No.

Why or Why Not? (Provide Evidence)

Whatcom County adopted Ordinance Number 2025-060, updating applicable development regulations under WCC 20.80.910 to comply with the requirements of [House Bill 1337](#)/RCW [36.70A.680/.681/.682](#).

Action Needed to Address Barrier

None identified at this time.

B. Process Obstacles**Barrier #1: Lack of Clear and Accessible Information about Processes and Fees**Is This Barrier Likely to Affect Housing Production (Yes or No)?

Yes .

Why or Why Not? (Provide Evidence)

- The County maintains clear information about the process and fees for [Accessory Dwelling Units on a new webpage linked here](#), which has been updated to include new regulations for ADUs in urban areas.

- In spite of these efforts, there is still room for improvement in communication on permit processes and fees.

Action Needed to Address Barrier

- Increase outreach to stakeholder groups and the public, and train staff to increase efficiency and consistency in staff communication to customers.

Barrier #2: Permit Fees, Impact Fees & Utility Connection Fees Not Proportionate to Impact

Is This Barrier Likely to Affect Housing Production (Yes or No)?

No.

Why or Why Not? (Provide Evidence)

Under [Ordinance Number 2025-060](#), proposals for ADUs in UGAs no longer need to first obtain an Administrative Use Permit before submitting a Building Permit. This change will save applicants thousands of dollars in permitting fees. In addition, land use application fees in Whatcom County are low compared to other jurisdictions of similar size and services offered, and Building Permit fees are based on the valuation of the proposed structure.

Action Needed to Address Barrier

None identified at this time.

Barrier #3: Processing Times & Staffing Challenges

Is This Barrier Likely to Affect Housing Production (Yes or No)?

No.

Why or Why Not? (Provide Evidence)

While PDS has a limited number of planners who are able to process special land use applications like "Administrative Use Permits", under the new ADU regulations adopted under [Ordinance Number 2025-060](#), ADU applications in UGAs were recategorized from "Administrative" to "Permitted", meaning an application can directly apply for a Building Permit without first obtaining a land use permit. This reduces administrative processing time for these ADU applications.

Action Needed to Address Barrier

None identified at this time.

Appendix L

Greenhouse Gas Emissions Reduction Subelement- Washington State Department of Commerce Approval

On May 26, 2026, the Whatcom County Council (“Council”) approved Resolution 2026-022, “Regarding Greenhouse Gas Reduction Sub-Element Voluntary Review,” relating to the 2026 Whatcom County Comprehensive Plan Periodic Update under the Washington State Growth Management Act (RCW 36.70A.096). Within 10 days of adoption of the Comprehensive Plan, Whatcom County will submit the greenhouse gas reduction sub-element application to the Washington State Department of Commerce (“Commerce”) for review, following the requirements listed in [RCW 36.70A.096\(3\)\(b\) \(2023\)](#). The State approval decision becomes final and the Greenhouse Gas Reduction subelement becomes effective upon publication by the State in the Washington State Register.

Per [RCW 36.70A.096](#), “Comprehensive Plans- Greenhouse Gas Emissions Reduction Subelement- Department Approval,” Commerce’s final decision to approve or reject a proposed greenhouse gas emissions reduction subelement or amendment must be based solely on whether or not the adopted or amended greenhouse gas emissions reduction subelement, any adopted amendments to other elements of the comprehensive plan necessary to carry out the subelement, and any adopted or amended development regulations necessary to implement the subelement, comply with the goal set forth in [RCW 36.70A.020\(14\)](#) as it applies to greenhouse gas emissions reductions, [RCW 36.70A.070\(9\)](#) excluding [RCW 36.70A.070\(9\)\(e\)](#), the guidelines adopted under [RCW 70A.45.120](#) applicable to the greenhouse gas emissions reduction subelement, or [chapter 43.21C RCW](#).

[WAC 365-196-443\(1\)](#) outlines requirements and recommendations for the planning process to develop a climate and resiliency element. The greenhouse gas reduction subelement must be designed to, “result in reductions in overall greenhouse gas emissions... which must include efforts to reduce localized greenhouse gas emissions.” The greenhouse gas emissions reduction subelement must also be consistent with guidelines published by Commerce pursuant to [RCW 70A.45.120](#) (Washington Department of Commerce 2023 Intermediate Climate Guidance). Actions not specifically identified in the guidelines developed by Commerce may be considered consistent with the guidelines only if the actions meet certain criteria. Actions will be considered consistent if those actions are projected to achieve greenhouse gas emissions reductions or per capita vehicle miles traveled reductions equivalent to what would be required of the jurisdiction under guidelines adopted by Commerce, and the actions are supported by scientifically credible projections and impact scenarios that indicate their adoption is likely to result in reductions of greenhouse gas emissions or per capita vehicle miles travelled.

Per Commerce recommendations for both the greenhouse gas reduction and resilience subelements, the climate element may take the form of a single chapter or may be a collection of climate goals and policies (for example, land use, housing, and transportation elements). Counties and cities that must create a greenhouse gas reduction subelement are required revise the subelement every comprehensive plan periodic update cycle, based on updated emissions data for the county's geographic area.

Counties and cities creating a greenhouse gas reduction subelement are also recommended to follow Commerce's five step planning process. This process includes conducting an inventory of local greenhouse gas emissions, including all emissions sources. The 2023 Washington State Department of Commerce Intermediate Guidance (p. 44) provides that counties voluntarily seeking Commerce's approval of the Greenhouse Gas Reduction Sub-element should use a Commerce-provided inventory to select mitigation goals and policies to satisfy the minimum requirements. This emissions data is intended to establish a baseline for 2022 countywide emissions that can be updated for five-year periodic reporting and support jurisdictions when developing incremental emission-reduction targets commensurate with Washington's 2050 statewide target, per [RCW 70A.45.020\(1\)\(c\)](#).

Guidance from the state also directs that if a local governmental entity decides to integrate greenhouse gas emission reduction goals and policies in other elements rather than with a single climate chapter, then the county or city should provide an index of the location of the full suite of climate measures in a memo when submitting its comprehensive plan for Commerce's review. The subjoined appendix serves to designate which goals and policies Council is directing are within the scope of the state review for the purposes of, "explaining how the adopted subelement complies with the provisions of [RCW 36.70A.096](#)." Final legislative action to adopt the Whatcom County Comprehensive Plan is codified in the Ordinance, "Adopting Amendments to the Whatcom County Comprehensive Plan and Foothills Subarea Plan for the Growth Management Act Periodic Review and Update."

Whatcom County Greenhouse Gas Emissions Reduction Subelement- Goals and Policies for State Review

In 2023, the Washington State Legislature passed House Bill 1181, an act relating to improving the state's climate response through updates to the state's planning framework. In addition to adding the climate element as a required element for certain jurisdictions, the following sections of RCW 36.70A were amended by the legislature relating to the Land Use and Transportation Elements as follows (amendments underlined):

- [RCW 36.70A.020\(3\)](#)- "Encourage efficient multimodal transportation systems that will reduce greenhouse gas emissions and per capita vehicle miles

traveled, and are based on regional priorities and coordinated with county and city comprehensive plans.”

- [RCW 36.70A.070\(1\)](#)- “Wherever possible, the land use element should consider utilizing urban planning approaches that promote physical activity and reduce per capita vehicle miles traveled within the jurisdiction, but without increasing greenhouse gas emissions elsewhere in the state.”
- [RCW 36.70A.070\(6\)\(B\)](#)- Multimodal level of service standards for all locally owned arterials, locally and regionally operated transit routes that serve urban growth areas, state-owned or operated transit routes that serve urban areas if the department of transportation has prepared such standards, and active transportation facilities to serve as a gauge to judge performance of the system and success in helping to achieve the goals of this chapter consistent with environmental justice. These standards should be regionally coordinated.

As part of the review procedures under [RCW 36.70A.130](#), Council initiated a full review of revisions to every chapter of the Comprehensive Plan. This included legislative action to review and revise the comprehensive plan to address new planning requirements, as well as Council-initiated amendments across multiple chapters. Consistent with county code, Council found that the public interest will be served by the amendments initiated and approved by Council ([Whatcom County Code 22.10.060](#)).

Given that the implementation progress report requirements for the climate element will include, “progress toward implementing any actions required to achieve reductions to meet greenhouse gas and vehicle miles traveled requirements as provided for any element of the comprehensive plan under RCW 36.70A.070,” and Council has amended policies related to greenhouse gas emissions reductions throughout the Comprehensive Plan, Whatcom County will submit the subjoined index in the application for state review and approval.

Assuming Commerce approves the greenhouse gas subelement, it will provide a final determination through publication of the decision on the Washington State Register, indicating that the policies and goals, as identified in the index below, are consistent with state law and agency guidance. Any future modifications to the Whatcom County Comprehensive Plan policies that Commerce utilizes to make its approval determination, as listed in the final notice of approval, will require resubmittal of the greenhouse gas reduction subelement for Commerce approval.

Policy Index: Whatcom County Comprehensive Plan- Chapter 12- Climate Element- Greenhouse Gas Reduction Subelement- Goals and Policies (Preliminary Council Motion for Public Hearing)-

Ch. 12	Climate- Greenhouse Gas Reduction Subelement- Background Summary
	Until such time as Commerce adopts such guidelines for periodic reporting and Climate Element Implementation Progress Reports, Whatcom County will quantify countywide progress on greenhouse gas emissions and vehicle miles traveled reductions per capita for the Five-Year Climate Element implementation progress report required in RCW 36.70A.130(9) (2025) based on the following interim performance indicators. Consistent with the 2050 statewide net zero greenhouse gas emissions target set by the Washington State Legislature in RCW 70A.45.020 and adopted in Whatcom County Countywide Planning Policy T3: • All electric utilities serving retail customers in Whatcom County meet interim targets for greenhouse gas neutrality under WAC 194-40-040 (2026). • Natural gas utilities serving retail customers in Whatcom County meet each two-year therm conservation target, consistent with RCW 80.28.380 (2024). • Battery electric vehicles (BEVs) and plug-in hybrid electric passenger vehicles (PHEVs) registered in Whatcom County increase by at least 20% towards the target of 13,810 electric vehicles, in partnership with the private sector and developers, and subject to consumer demand and economic conditions. • Reduce annual vehicle miles traveled (VMT) per capita across incorporated and unincorporated Whatcom County by at least 3%, as measured by annual certified mileage reporting by the Washington State Department of Transportation.
Ch. 12	Relationship to Federal, State, and Regional Regulations
	Greenhouse gas emissions generated within Whatcom County's geographic boundary are also the subject of federal, state and regional regulations. For the purposes of the climate element review and evaluation program and implementation progress reporting requirements under RCW 36.70A.130 (2025), any legislatively approved incremental greenhouse gas emissions target adopted by Whatcom County, five-year required progress reporting for the climate element, and identified regulations, zoning, land use changes, or other legislative or

	administrative action to implement the climate element will consider express or implied preemption, where consistent with state and federal regulations. This principle is consistent with RCW 70A.65.080(8) (2025), the Washington State Climate Commitment Act which designates that WA State Department of Ecology cannot require that multiple covered entities, including refineries, fuel suppliers, facilities using natural gas, and natural gas utilities, have compliance obligations for the same greenhouse gas emissions. The state operating budget, ESSB 5092 (2021), which funded the WA State Department of Commerce's initial development of the climate intermediate planning guidance also stipulated that the set of actions cities and counties may take, as recommended by Washington State Department of Commerce, must be within a jurisdiction's existing statutory authority and implemented through updates to comprehensive plans and development regulations.

Ch. 12	Climate- Greenhouse Gas Reduction Subelement- Agriculture & Food Systems (12-A)
12-A	Reduce greenhouse gas emissions from agriculture and food system activities that contribute to climate change.
12-A-1	Support incentives for renewable energy projects, including agrivoltaic systems, that integrate renewable energy production with ongoing agricultural activities.
12-A-2	Encourage agricultural producers to reduce the uses of fuels, agricultural supplies, synthetic fertilizers, and pesticides derived from fossil fuels.
12-A-3	Increase accessibility of locally produced agricultural products by supporting retail, institutional, and community market opportunities for local producers and food businesses.
12-A-4	Facilitate the development of local distribution networks and processing infrastructure to reduce distances traveled to transport agricultural goods and inputs.
12-A-5	Provide financial incentives and technical support for the replacement of conventional refrigeration systems with appliances that use alternative refrigerants, reducing pollutants from leaking cooling systems.
12-A-6	Partner with livestock producers to implement best practices for manure management, including anaerobic digesters and manure application to reduce greenhouse gas emissions and improve soil health.
12-A-7	Promote the adoption of efficient irrigation technologies and practices that minimize water use, increase soil water holding capacity, and reduce energy consumption associated with water treatment and distribution.

Ch. 12	Climate- Greenhouse Gas Reduction Subelement- Buildings & Energy (12-B)
12-B	Reduce emissions from building and energy use by promoting the transition to renewable energy sources, implementing green building standards, and retrofitting existing buildings to be more energy efficient.
12-B-1	Continue to implement the Washington State Building Code’s requirements for residential and commercial construction, including space and water heating guidelines for eligible new commercial construction and energy efficiency targets for residential construction.
12-B-2	Expand access to utility, state, and federal resources, technical assistance and incentives for the retrofitting of existing buildings to improve building operational efficiency.
12-B-3	Encourage the development of single and networked microgrids and distributed energy storage with battery back-up to support energy security, resilience, and affordability.
12-B-4	Promote the development of wind, hydroelectric, biomass, nuclear, tidal, wave, solar, and geothermal energy projects, including small-scale and community-owned renewable energy installations.
12-B-5	Advocate for utility investments in renewable energy development, energy efficiency incentives, and low-income energy assistance in Whatcom County to meet the Clean Energy Transformation Act compliance targets.
12-B-6	Encourage the design of highly energy-efficient new buildings that utilize on-site or off-site renewable energy, and include the use of low-carbon, recycled, or reused materials in building projects.
12-B-7	Update the Whatcom County code and development standards to incorporate best practices for renewable energy project permitting and siting, consistent with WA Healthy Environment for All (HEAL) Act guidance.
12-B-8	Improve construction resource efficiency by encouraging the use of locally or regionally derived building materials, such as wood and mass timber products that sequester and store embodied carbon.
12-B-9	Review bidding and procurement policies to prioritize lower-carbon building processes, sustainable and/or reclaimed building materials, energy efficiency, renewable energy, and alternative and active transportation infrastructure (such as electric vehicle charging and bicycle storage) in County funded capital projects.

Ch. 12	Climate- Greenhouse Gas Reduction Subelement- Cultural Resources (12-C)
12-C	Protect, avoid, minimize, or mitigate impacts to cultural resources from Climate Commitment Act funded programs or projects through meaningful consultation, as defined by HB 1753 (2022) and RCW 70A.65.305 (2024), with the appropriate local, state, and federal authorities, including affected Indian Tribes.

12-C-1	At the earliest possible date prior to submittal of an application to receive funds from Climate Commitment Act accounts, Whatcom County will consult with the Department of Archaeology and Historic Preservation, Department of Fish and Wildlife and all interested federally recognized Tribes with treaty rights or interests in the project area, in accordance with RCW 70A.65.305 (2024) .
12-C-2	Consultation will be early, meaningful, and individual with any affected federally recognized Tribe, with the goal of identifying Tribal and cultural resources potentially affected by the funding decisions and funding programs, assess their effects, and seek ways to avoid, minimize, or mitigate any adverse effects on cultural resources.
12-C-3	Whatcom County will accept any documents summarizing Tribal issues, questions, concerns, or other statements regarding the project. The summary document submitted by Tribes during consultation will become part of the official application on file and do not limit what issues affected Tribes raise in the consultation process.
12-C-4	Whatcom County will adhere to all state and federal regulations that protect the location of certain cultural resources from disclosure. Any information that is exempt from disclosure pursuant to RCW 42.56.300 (2014) or federal law, including section 304 of the National Historic Preservation Act of 1966, shall not become part of the official application file.
12-C-5	Consultation will be independent of, and in addition to, any public participation process required by federal or state law, or by a federal or state agency, including the requirements of Executive Order 21-02 related to archaeological and cultural resources.
12-C-6	Whatcom County will work with the state and Tribes to identify and determine the potential impacts, including cumulative impacts, on affected cultural resources during the review of large-scale renewable energy permitting applications.
12-C-7	Whatcom County will work with the state and Tribes to identify and evaluate the potential impacts, including cumulative impacts, of proposed low-carbon transportation projects, energy transmission, and water utility infrastructure expansion on cultural resources.
12-C-8	Development on sites adjacent to or containing cultural resources should be planned and carried out so as to be compatible with continued protection of that resource.

Ch. 12	Climate- Greenhouse Gas Reduction Subelement- Economic Development (12-D)
12-D	Support the development of a local economic system that fosters business operations and opportunities associated with climate action.
12-D-1	Assist property owners regulated under the Clean Buildings Performance Standard in accessing incentives to reduce building energy use and meet early compliance deadlines for Tier 1 and 2 buildings.
12-D-2	Consistent with the Climate Commitment Act, support covered industries' participation in the Washington State cap-and-invest market.
12-D-3	Encourage the development of local carbon offset projects to reduce greenhouse gas emissions and generate industry investment in local carbon sequestration projects.
12-D-4	Support emissions reductions within the manufacturing sector by partnering to increase access to state and federal incentives for the adoption of less carbon-intensive equipment.
12-D-5	Encourage participation of qualified commercial, industrial, and multifamily properties in Whatcom County's C-PACER (Commercial Property Assessed Clean Energy and Resilience Program) to finance energy efficiency, renewable energy, water conservation, and resilience projects.
12-D-6	Determine eligible uses of economic development incentives, such as consumption tax exemptions, property tax abatements, and tax increment financing, to support climate action projects.
12-D-7	Promote purchasing from local businesses to support economic development and reduce emissions associated with the production and distribution of goods.
12-D-8	Partner with Western Washington University, Whatcom Community College, Bellingham Technical College, Northwest Indian College, K-12 schools and skill centers, Northwest Workforce Council, the Port of Bellingham, the Whatcom Working Waterfront Coalition, cities, unions and apprenticeship programs, and local businesses to address workforce skill gaps in emerging sectors that support climate action.

Ch. 12	Climate- Greenhouse Gas Reduction Subelement- Ecosystems (12-E)
12-E	Protect, expand, retain, and restore open space, green space and tree canopy to promote aquatic and terrestrial carbon sequestration.
12-E-1	Identify, protect, and restore tidal wetlands and submerged aquatic vegetation, including seagrass, eelgrass, and kelp to enhance blue carbon sequestration.
12-E-2	Designate high-value greenspace and greenways for acquisition, conservation easements, or other preservation programs to enhance carbon sequestration and provide community benefits.

12-E-3	Increase, retain, and protect the tree canopy in UGAs, prioritizing underserved areas with low canopy cover and areas that may otherwise be vulnerable to urban heat island effects.
12-E-4	Develop and implement forest management plans for County-owned property, including individual parcels, parks, greenspace, and forestland to address climate stressors and guide adaptive management practices.
12-E-5	Discourage the conversion of forests, agricultural land, grasslands, wetlands, critical areas, riparian areas, estuaries, and other high-carbon storage areas for uses that are incompatible with habitat preservation and carbon sequestration goals.
12-E-6	Identify, protect, and restore riparian areas on public and private properties to protect water quality, salmon and wildlife habitat, and to store carbon in riparian vegetation, wetlands, and soils.

Ch. 12	Climate- Greenhouse Gas Reduction Subelement- Health (12-F)
12-F	Improve public health outcomes and advance health equity by increasing access to sustainable transportation, renewable energy, and locally produced food.
12-F-1	Protect, maintain, and invest in transportation infrastructure that promotes access to sustainable transportation options, such as walking, cycling, transit services, and electric vehicles.
12-F-2	Prioritize investments to reduce vehicle emissions and miles travelled in neighborhoods disproportionately affected by air and water pollution.
12-F-3	Ensure equitable access to clean drinking water, wastewater, and energy services by identifying and addressing utility infrastructure gaps, particularly in rural and underserved communities.
12-F-4	Coordinate with existing utility-run or state administered programs that provide financial assistance or subsidies for low-income households and landlords to improve energy efficiency, reduce utility costs, and access renewable energy.
12-F-5	Strengthen support for community-based programs that promote access to locally produced, healthy, and culturally appropriate food, particularly for individuals experiencing food insecurity.
12-F-6	Improve recreational access to public lands to promote equitable access to open space, greenspace, and parks and improved public health outcomes.

Ch. 12	Greenhouse Gas Reduction Subelement-Transportation (12-G)
12-G	Support reductions in per capita Vehicles Miles Traveled (VMT) and in greenhouse gas emissions per VMT by adopting new transportation planning approaches and technologies, expanding infrastructure, improving connectivity, and increasing access to low-carbon transportation options.
12-G-1	Support efforts to reduce per capita vehicle miles traveled (VMT) and single occupant vehicle trips, including compliance with the Commute Trip Reduction Act and other initiatives to increase carpooling, ridesharing, telecommuting, bicycling, rail, and transit use.
12-G-2	Work with Whatcom Council of Governments and cities to establish and track local and regionally coordinated per capita VMT reduction goals and policies consistent with the statewide reduction targets in RCW 47.01.440 (2023) .
12-G-3	Coordinate with WSDOT, Whatcom Council of Governments, Tribes, and cities to update the regional transportation plan to estimate and track transportation related greenhouse gas emissions by jurisdiction in Whatcom County.
12-G-4	Support initiatives that drive the adoption of fuel-efficient and low-emission freight technologies, including electric trucks and cleaner heavy-duty cargo-handling equipment.
12-G-5	Promote the adoption of electric vehicles (EVs) by increasing awareness of state and federal incentives for EV purchases and leases.
12-G-6	Collaborate with regional partners to facilitate and invest in the development and installation of a countywide electric vehicle (EV) charging network, including prioritizing underserved and disadvantaged communities to ensure equitable access.
12-G-7	Implement the countywide active transportation network and further expand an interconnected, regional multimodal network of pedestrian, bicycle, and transit facilities that enables more trips via walking, biking, and transit.
12-G-8	Encourage the adoption of battery-electric and low-carbon technology alternatives for off-road equipment used in construction, agriculture, and industrial activities.
12-G-9	Collaborate with Whatcom Transportation Authority (WTA) to ensure the operation and promote the use of a reliable, efficient, and equitable transit network that reduces emissions by promoting transit use over internal combustion engine vehicles.
12-G-10	Support Whatcom Transportation Authority's goal to transition to a zero-emission fleet by 2040.
12-G-11	Support regional and industrial efforts to reduce emissions in the aviation sector through advancements in sustainable aviation fuel and aircraft technologies.

12-G-12	Support the Port of Bellingham’s initiatives to electrify shipping terminals and promote the transition to cleaner marine engines and equipment.
12-G-13	Support state and federal incentives to increase efficiency and replace diesel-powered passenger and freight trains with lower carbon alternatives.
12-G-14	Review bidding and procurement policies to prioritize lower-carbon materials and processes in County funded transportation and infrastructure projects.

Ch. 12	Climate- Greenhouse Gas Reduction Subelement- Waste Management (12-H)
12-H	Reduce emissions associated with waste management, sewage disposal, and wastewater treatment across Whatcom County.
12-H-1	Support reductions in waste hauler emissions by promoting efficiency in collection routes, reducing idle times, and transitioning fleets from diesel to low- or zero-carbon fuels.
12-H-2	Advocate for waste processors to adhere strictly to the Environmental Protection Agency (EPA) and manufacturer guidelines for proper refrigerant decommissioning to reduce emissions during disposal.
12-H-3	Encourage the alignment of private waste haulers with the Whatcom County Comprehensive Solid and Hazardous Waste Management Plan to minimize waste generation and disposal emissions.
12-H-4	Support the expansion of organic material collection services to increase the diversion of waste from landfills, as required by RCW 70A.205.545 (2025) and consistent with RCW 70A.205.715 (2020) .
12-H-5	Consider revising Whatcom County’s Flow Control Ordinance (No. 91-041) to include the recycling of construction and demolition debris, promoting the reuse and recovery of building materials to reduce waste and associated emissions.
12-H-6	Support the adoption of technologies that reduce methane emissions in public wastewater treatment systems.
12-H-7	Expand the septic tank replacement rebate programs and septic inspections to incentivize the installation and maintenance of systems.
12-H-8	Compliant with RCW 70A.205.040 (2022) , Whatcom County will amend zoning code to allow for the siting of organic materials management facilities in the areas identified in RCW 70A.205.040(3)(a)(i) , to the extent necessary to provide for the establishment of the organic materials management volumetric capacity identified under RCW 70A.205.040(3)(a)(ii).

Ch. 12	Climate- Greenhouse Gas Reduction Subelement- Water Resources (12-I)
12-I	Work with water utilities to reduce emissions associated with water treatment through the adoption of new technologies and implementation of water conservation and efficiency practices.
12-I-1	Support efforts to improve energy efficiency in wastewater treatment through investment in advanced monitoring and control technologies that optimize energy use.
12-I-2	Support incentive programs to promote water conservation practices that reduce overall water demand and the energy required for water treatment.
12-I-3	Encourage the use of smart irrigation systems, stormwater management strategies, and preventative maintenance by water users to improve water efficiency.
12-I-4	Promote wastewater reuse and water conservation by water users to lower energy and water treatment emissions.

Ch. 12	Climate- Greenhouse Gas Reduction Subelement- Zoning & Development (12-J)
12-J	Implement dense, mixed-use, and transit-oriented development in UGAs, where appropriate, and land preservation policies in rural areas to reduce greenhouse emissions.
12-J-1	Adopt incentive programs, such as density bonuses and tax deferrals in Urban Growth Areas (UGAs) to promote compact, transit-oriented, and infill development, reducing vehicle miles traveled and associated transportation emissions.
12-J-2	Strengthen the Density Credit Program, Conservation Easement Program, and Transfer of Development Rights Program to promote higher-density developments and preservation of open spaces and rural lands for carbon sequestration.
12-J-3	Review Whatcom County code for opportunities to discourage conversion of forestland for non-forestry uses and agriculture land for non-agriculture uses.
12-J-4	Consistent with the Critical Areas Ordinance, strongly discourage development that would degrade wetlands to support carbon sequestration goals.
12-J-5	Evaluate mitigation monitoring to determine the effectiveness of critical areas protections and riparian management initiatives.
12-J-6	Support the creation of Whatcom County wetland mitigation banks that can be used by public and private development.

Policy Index: Whatcom County Comprehensive Plan- Chapter 2- Land Use (2DDD), Chapter 4- Capital Facilities (4M), Chapter 5- Utilities (5G, 5H, 5T), Chapter 6- Transportation (6A, 6D, 6F, 6H, 6J, 6K)- Goals and Policies (Preliminary Council Motion for Public Hearing)

Ch. 2	Land Use- Vehicle Miles Travelled Per Capita (2DDD)
2DDD	Wherever possible, consider utilizing urban planning approaches that reduce per capita vehicle miles traveled within the County, but without increasing greenhouse gas emissions elsewhere in the state.
2DDD-1	Support compact mixed-use development near transit in UGAs to improve transit accessibility and reduce vehicle trips.
2DDD-2	Support development of a safe, well-connected, and attractive bicycle and pedestrian transportation network to connect communities and destinations.
2DDD-3	Support efforts to reduce per capita vehicle miles traveled and single occupant vehicle trips, including compliance with WCC 16.24 (Commute Trip Reduction) and other initiatives to increase carpooling, ridesharing, telecommuting, bicycling, rail, and transit use.
2DDD-4	Coordinate with cities and employers to plan for development of housing, services, alternative transportation, and infrastructure in proximity to employment to reduce vehicle miles traveled.

Ch. 4	Capital Facilities- Climate (4M)
4M	Plan for greenhouse gas emissions reduction and climate resilience as part of all capital projects included in the County's Capital Improvement Program.
4M-1	Install fleet and publicly accessible electric vehicle charging infrastructure at new and existing County facilities, as required by WAC 51-50-0429 , and in support of fleet electrification requirements under RCW 43.19.648 , to the extent practicable.
4M-2	Construct new and renovated County facilities over 5,000 square feet to a minimum of LEED (Leadership in Energy and Environmental Design) Silver standard where feasible, as required in County resolution 2005-028, and evaluate costs to meet LEED Gold or Platinum certification level.
4M-3	Retrofit County owned buildings, that are regulated under the Clean Buildings Performance Standard, to meet energy use intensity targets set by the state's energy benchmarking law, RCW 19.27A.210 .
4M-4	Site solar systems with battery storage at County facilities, where suitable.
4M-7	Explore opportunities to support alternative infrastructure models and off-grid and distributed renewable energy systems serving public facilities development, where such systems reduce reliance on existing infrastructure and advance the County's climate resilience goals.

Ch. 5	Utilities- Regulatory Controls Encouraging Energy Conservation and Efficiency (5G)
5G	Support cost-effective conservation as a significant supply factor and implement policies that promote energy conservation measures.
5G-1	Land use regulations shall be consistent with the conservation and other goals in this chapter and the climate element.
5G-2	Encourage and support the use of energy conservation strategies and technologies.
5G-3	Support energy conservation and energy efficiency in all proposed residential, commercial, and industrial projects by improving the energy efficiency of new construction and the existing building stock through building codes and practices, and support refurbishing and remodeling projects to include energy efficient components via expedited permitting and assistance.
5G-4	Facilitate and encourage conservation of resources, in order to delay the need for additional facilities for electrical energy and water resources, and to maintain adopted air quality standards.
5G-5	The County should work with utility providers and consider opportunities for coordinated education and outreach and to inform the public about energy efficiency and renewable energy sources.
5G-6	Consider the County's potential role in supporting rural off-grid residential development in partnership with landowners and partners, where such development is designed to minimize public infrastructure demand, including demand on the energy grid, generate useful performance data, and remain consistent with the long-term use of adjacent resource lands.
Ch. 5	Utilities- Low Carbon or Renewable Energy (5H)
5H	Support cost-effective renewable energy projects and implement policies that promote renewable energy projects.
5H-1	Land use regulations shall be consistent with the renewable energy and other goals in this chapter and the climate element.
5H-2	Explore emerging low-carbon or renewable energy technologies, and when applicable, update Whatcom County Code as needed to support renewable energy production, generation, transmission, and distribution.
5H-3	Whatcom County should engage and coordinate with Tribal treaty rights holders and other impacted communities before recommending resource, land, or water-intensive energy projects such as hydroelectricity, nuclear, and tidal energy when the County has permitting responsibilities.
5H-4	Encourage and support the development of low-carbon or renewable energy projects and technologies, such as anaerobic digesters and solar, battery energy storage systems, and wind energy, geothermal, nuclear, wave, tidal, and green hydrogen, where applicable.
5H-5	Support renewable energy incentives to businesses and groups to install renewable energy systems.

5H-6	Coordinate with the Department of Ecology for eligible renewable energy products through the Clean Energy Coordinated Permitting Process, Chapter 43.158 RCW .
5H-7	Work with utilities regulated under the Clean Energy Transformation Act (CETA) to ensure Clean Energy Implementation Plans align with state target for an electricity supply free of greenhouse gas emissions by 2045.
5H-8	Support Whatcom Public Utility District’s energy efficiency programs and exploration of alternative energy sources, such as geothermal and fusion.
5H-9	Support regional and statewide efforts to develop utility scale renewable projects to increase production of energy from renewable sources, such as wind, solar, green hydrogen, and other alternatives.
5H-10	Explore pathways to support integrated off-grid renewable energy and utility systems—including solar generation with battery storage and alternative onsite wastewater treatment—serving low-impact rural residential development on resource lands, subject to applicable state health and building codes, site suitability, and County capacity considerations. Consider off-grid renewable energy systems as a complementary distributed energy strategy.
5H-11	Support reliable, affordable, resilient, and environmentally responsible energy systems, including renewable, non-carbon or low-carbon, and emerging energy technologies, while ensuring appropriate protection of natural resources, treaty rights, cultural resources, public safety, and rural character.
5H-12	Recognize geothermal energy, including hydrothermal, direct- use, closed-loop, and other emerging geothermal technologies, as a potential renewable energy resource that may contribute to regional energy reliability, economic development, and greenhouse gas reduction goals.
5H-13	Recognize that certain non-carbon or renewable energy resources, including geothermal resources, may be geographically constrained and may require case-specific siting considerations based on geology, thermal resource location, transmission availability, environmental constraints, and public safety considerations.
5H-14	The County should periodically evaluate and update development regulations, permitting procedures, definitions, and environmental review processes related to non-carbon, renewable, and emerging energy technologies to ensure regulations remain effective, scientifically informed, and consistent with state law, technological advances, and regional energy needs.
5H-15	The County may adopt or amend land use designations, zoning classifications, development regulations, conditional use procedures, performance standards, or other implementing regulations to accommodate non-carbon or renewable resource energy generation, storage, transmission, and related infrastructure, including location-dependent energy resources, where appropriate and consistent with environmental review, public safety, and resource protection goals.

5H-16	Non-carbon or renewable resource energy generation, storage, transmission, and supporting utility infrastructure may serve essential public functions and should not be categorically precluded from consideration within the County where impacts can be appropriately mitigated.
Ch. 5	Utilities- Solid Waste Management (5T)
5T	Support Washington’s organic management goal of reducing organic waste going to the landfill by 75% in eligible Business Organic Management Areas and eligible residential customers, through source reduction, composting, anaerobic digestion, or other means.
5T-1	The County’s goal is to reduce Whatcom County’s share of food waste sent to landfills by 50%, consistent with the Use Food Well Washington Plan, Whatcom County Food Systems Plan, Whatcom County Climate Action Plan, and Comprehensive Solid and Hazardous Waste Management Plan.
5T-2	Participate in state programs to conduct regular audits of food waste sources across the county, establish food waste reduction programs, and support stakeholders required to comply with Washington’s organic management law.
5T-3	Increase diversion from the landfill by providing financial incentives to programs that donate surplus food to food banks and food shelters.

Ch. 6	Transportation- Multimodal Level of Service Standard- Pedestrian, Bicycle, Transit (6A)
6A	Provide for the long-term safe and efficient movement of people and goods, taking into consideration mitigation of climate impacts and natural hazards, by establishing and maintaining multimodal level of service (MMLOS) standards levels of service for motor vehicle traffic volumes compared to roadway capacity (Maps 6-5, 6-6, and 6-10) and for Active Transportation Network (ATN) completeness (Maps 6-2, 6-7, and 6-8).
6A-7	Pedestrian MMLOS Standards on the countywide Active Transportation Network (Maps 6-2, 6-7, and 6-8) are listed below; incorporate these standards into long-range capital planning and Six-Year TIP programming to achieve network completion over time subject to funding availability: A. Incorporated UGA: Urban standard sidewalks both sides or shared two-way multiuse pathway one side. B. Unincorporated UGA: Urban standard sidewalk both sides or shared two-way multiuse pathway one side. C. Rural County: 5-foot-wide shoulder on roadway • Green = Complete Network Link, meets County standards • Yellow = Incomplete Network, doesn't meet County standards • Red = Missing Network Link, doesn't meet County standards

6A-8	Bicycle MMLOS Standards on the countywide Active Transportation Network (Map 6-2, 6-7, and 6-8) are listed below; incorporate these standards into long-range capital planning and Six-Year TIP programming to achieve network completion over time subject to funding availability: A. Incorporated UGA: Urban standard marked bike lanes both sides or shared two-way multiuse pathway one side. B. Unincorporated UGA: Urban standard marked bike lanes both sides or shared two-way multiuse pathway one side. C. Rural County: 5-foot-wide shoulder on roadway • Green = Complete Network Link, meets County standards • Yellow = Incomplete Network, doesn't meet County standards • Red = Missing Network Link, doesn't meet County standards
6A-9	The Transit MMLOS Standard is based on site readiness for installation of stop amenities and ADA accessibility of WTA transit bus stops within the public road right-of-way. The prioritization and completion of ADA upgrades at all WTA bus stops provides mutual benefit to Whatcom County and WTA. • Gold = ADA Compliant Pedestrian Connection to Transit Stop and a landing pad sufficient to support a transit shelter • Green = ADA Compliant Transit Stop and ADA-compliant pedestrian connection to transit stop or a landing pad sufficient to support a transit shelter • Orange = Non-ADA-compliant transit Stop and substandard pedestrian connection to transit stop and a landing pad sufficient to support a transit shelter • Red = Non-compliant Transit Stop and No Pedestrian Connection to Transit Stop
6A-10	Continue to evaluate using Level of Traffic Stress (LTS) as the MMLOS standard for pedestrian and bicycle facilities on the countywide Active Transportation Network, including studying the appropriate LTS for Rural County roads that form connections between population and employment centers located in UGAs and cities.
Ch. 6	Transportation- Coordination with Land Use (6D)
6D	Support land use planning efforts in Whatcom County that include land use types and densities that promote walking, biking, and transit and reduces reliance on single-occupant vehicles and vehicle miles traveled.
6D-1	Allow densities and mixed uses in urban areas to reduce the number and length of vehicle trips, increase opportunity to use public transportation, and encourage pedestrian and bicycle trips.
6D-2	Promote land use strategies and transportation investments that reduce single occupant vehicle trips and vehicle miles traveled while discouraging transportation improvements investments that would trigger development

	that is premature or not consistent with applicable comprehensive plans, policies, or zoning.
6D-3	Support continual education of the public regarding the relationship between transportation and land use issues and ways to support walking, biking, and transit to help reduce traffic congestion.
6D-5	Ensure that new developments provide safe and efficient infrastructure for pedestrians and bicyclists.
6D-6	Prioritize transportation investments and encourage new housing developments to be located in urban growth areas to help provide a sense of community and safe, active nonmotorized transportation to community facilities and public transit nodes.
6D-8	Support compatible land uses on the multimodal regional transportation system, including state highways subject to state Complete Streets requirements, to address all user needs.
Ch. 6	Transportation- Bicycle and Pedestrian Facilities (6F)
6F	Develop a countywide Active Transportation Network (Map 6-2) of bicycle and pedestrian facilities that encourages enhanced community access and promotes healthy lifestyles and supports both the transportation and recreational segments of our economy.
6F-1	Planning and design shall emphasize connectivity to the greatest extent possible, creating regional networks of bicycle and pedestrian facilities. Regional networks include both an on-road bicycle facility and walkway network and a regional multi-use path network. These networks should be interconnected; for example, walkways connect seamlessly with pedestrian paths and bike lanes connect to shared-roadway bike routes. The networks should also be coordinated with public transportation hubs and activity centers to enable multimodal trips of longer distances.
6F-2	Provide safe pedestrian facilities in all new construction and reconstruction transportation projects where there is the potential for significant use, unless physically or financially impracticable. An example of such a location would be in a traffic corridor within one mile of a school or community center that links residents to such facilities. Traditional curb/gutter/sidewalk designs may not be the standard approach in these areas since they are expensive, require large impervious surfaces, and may detract from the rural atmosphere. Other separated walkway designs should be considered that provide a physical separation or a barrier from motorized traffic
6F-3	An effective bicycle and pedestrian system for Whatcom County will require facilities for both regional connectivity and local access. Regional connectivity can be defined as transportation routes connecting major activity centers, towns, and cities within the region. A good example of a regional facility would be the Bay to Baker Trail or the proposed Salish Coast Trail.

6F-4	Coordinate design and implementation of multimodal transportation system improvements with cities, WTA, local community organizations, associations, or other governing structures. Collect and use the best available data to identify, analyze, and prioritize multimodal transportation. projects based on the following criteria: • safety improvements are needed • serves a residential or relatively high density rural or urban population area • serves a location frequently traveled by seniors, children, or people with disabilities • leads to a school or is part of a school route • provides access to a recreational facility or park • functions as a key network link for the regional active transportation network • offers economic development potential for an underserved area • ease of implementation due to low cost, public ownership, or other features • increases public safety and resilience to climate impacts and natural hazards Project prioritization should utilize a transparent and publicly available scoring framework that evaluates safety benefits, network connectivity, school access, traffic/stress rating, climate resilience, and cost effectiveness. The scoring criteria and results should be published as part of the Six-Year TIP development process.
6F-5	Fund an update to the existing (2011) Bicycle and Pedestrian Plan to be included in the Active Transportation Network (Map 6-2) improvement planning that identifies and prioritizes future pedestrian and bicycle facilities. The updated plan should identify and prioritize development of low- stress active transportation corridors that provide safe and comfortable connections between urban growth areas, rural communities, schools, and major activity & transit centers. Give priority to construction of pedestrian and bicycle facilities on streets within and between urban growth areas and rural communities where practical, and not at risk from climate impacts or natural hazards, and give priority to walkways and crosswalks along roadways within a one-mile radius of schools.
6F-6	For commercial and residential developments within urban growth areas and rural communities, developers shall fund on- street walkways, paths, crosswalks, consideration of regional trail segments, and other pedestrian accommodations, along with internal walkways or paths for onsite circulation that are necessary to provide pedestrian access from public streets to building entrances and within and between buildings.
6F-8	Publish an Annual Concurrency Report documenting the status of the countywide multimodal transportation system to inform investment in transportation facilities in the Whatcom County six-year transportation improvement program (TIP).

6F-9	Prioritize active transportation projects that utilize existing public rights-of-way, surplus roadway capacity, or publicly owned corridors to accelerate network completion and reduce implementation barriers.
6F-10	Develop and maintain a phased implementation strategy for achieving completion of the countywide Active Transportation Network (Map 6-2), including interim solutions where full buildout is not immediately feasible. Progress toward network completion shall be tracked and reported annually.
Ch. 6	Transportation- Intergovernmental Coordination and Implementation (6H)
6H	Coordinate with other governmental agencies in planning the County's transportation system.
6H-12	Inform and coordinate early and often with WSDOT to: a. Identify and plan for projects on or across state facilities. b. Identify and plan for projects to support multimodal use along and across the regional transportation network including state highways consistent with RCW 47.04.035 Complete Streets principles. c. Identify and plan for projects to support multimodal use along and across the regional transportation network including state highways consistent with the WSDOT Active Transportation Plan. d. Pursue support and funding for recommended projects identified in the 6-year Transportation Improvement Plan and the Capital Improvement Plan. e. Support maintenance in state rights of way or state facilities based on maintenance agreements. f. Review development projects near or adjacent to state facilities to coordinate local access and address transportation needs for all users. g. Minimize private access to state highways to enhance safety and mitigate chances of vehicle collisions. h. Coordinate with WSDOT to ensure that improvements meet the need of development and maintain MMLOS standards. i. Establish that proposed improvements on state facilities are consistent with the WSDOT Design Manual. j. Coordinate alterations to landscaping in WSDOT right-of-way are consistent with WSDOT removal and replacement policies, in coordination with maintenance agreements. k. To determine shared priorities related to international border crossings.
Ch. 6	Transportation- Congestion and Emissions Reduction (6J)
6J	Reduce the need for costly capacity-increasing roadway construction projects, and minimize emissions from combustion of fossil fuels, through completion of the Active Transportation Network (Map 6-2), motor vehicle travel demand reduction

	programs, promoting transit, and the use of intelligent transportation technology.
6J-1	Develop programs that reduce single-occupant vehicle use and vehicle miles traveled, minimizing trip length and reducing travel during peak periods, in order to minimize fuel consumption and the emission of greenhouse gases. These programs include, but are not limited to, trip reduction programs in coordination with major employers, other jurisdictions, and the Whatcom Transportation Authority.
6J-2	Support a regional public transit system that connects with various modes of transportation including auto, bicycle, and pedestrian travel and with the intercity bus, rail, ferries and airline facilities.
6J-3	Coordinate with Whatcom Transportation Authority to establish rural transit service in unincorporated areas, including Rural Communities and Rural areas, consistent with county land use plans, based on cost effectiveness, location of major trip generators, distance between generators, and the needs of transit-dependent individuals.
6J-4	Coordinate with Whatcom Transportation Authority and Washington State Department of Transportation to consider redevelopment of existing under-utilized park-and-ride lots along major corridors as Transit-Oriented Development opportunities to encourage infill development and transit use.
6J-5	Support multimodal use by encouraging, for example, secure bicycle storage facilities at park-and-ride lots and other transit facilities, and providing for the transportation of bicycles on public transit vehicles.
6J-8	Work with Whatcom County and the Sudden Valley Association to provide appropriate level of transit service to Sudden Valley to reduce traffic in the Lake Whatcom watershed.
6J-9	Encourage the development and installation of a comprehensive electric vehicle charging network, including the following opportunities: • Allow charging stations in commercial parking lots and other convenient locations; • Provide a streamlined and expedited permitting process for charging stations; • Provide incentives to developers, employers, and organizations that provide charging stations; • Consider requirements to include infrastructure for charging stations in multifamily and commercial developments; and • Pursue partnerships with Puget Sound Energy to consider voluntary development of charging stations to reduce costs.
Ch. 6	Transportation- Funding of Transportation Improvements (6K)
6K	Provide for adequate funding to keep Whatcom County's transportation facilities in good condition and current in terms of capacity.
6K-7	Allocate at least 5% of funding in the County's Six-Year Transportation Improvement Program (TIP) to projects that advance completion of the

	countywide Active Transportation Network (Map 6-2), including pedestrian, bicycle, and ADA accessibility improvements. Progress toward this goal shall be reported annually in the Concurrency Report.