



STATE OF WASHINGTON
DEPARTMENT OF COMMERCE

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March 30, 2026

County Council
Whatcom County
c/o Mark Personius
Director, Whatcom County Planning and Development Services

Sent via electronic mail: MPersoni@co.whatcom.wa.us

Re: Review of Whatcom County draft Comprehensive Plan

Dear County Council,

Thank you for the opportunity to comment on Whatcom County's draft Comprehensive Plan. We appreciate the ongoing coordination with our agency as you work to achieve the community's vision consistent with the goals and requirements of the Growth Management Act (GMA). Growth Management Services received the proposed amendment on January 29, 2026, and processed it with material identification number 2026-S-11467.

Your submission represents a great deal of work and progress towards the 2025 periodic update of your comprehensive plan and development regulations, which was due December 31, 2025.

We have reviewed your submittal using Commerce's [Periodic Update Checklist](#), and [Expanded Housing Checklist](#). We encourage you and your community to consider the following as you finalize your drafts:

1. The cities of Sumas, Nooksack, and Everson are each proposing urban growth area (UGA) expansions into areas currently designated as agricultural resource lands of long-term commercial significance. The proposed UGA expansions include de-designation of existing agricultural resource lands. WAC 365-190-040(10)(c) states that designations amendments should be based on consistency with either a change in circumstance related to the designation criteria, a change in circumstance to the subject property that is related to the designation criteria, an error in designation, or new information related to designation criteria. Taking this into consideration, we believe the County's agricultural lands assessment should clearly demonstrate why the areas proposed for de-designation and added to a UGA no longer meet the designation criteria, or why no other option is available for UGA expansion. [WAC 365-196-310\(5\)\(e\)\(v\)](#) states that urban

growth areas should not be expanded into designated agricultural, forest or resource lands unless no other option is available.

2. The housing element does not include documentation of programs and actions needed to achieve housing availability, as required by [RCW 36.70A.070\(2\)\(d\)\(ii\)](#). We recommend modifying the housing element to include a list of barriers to affordable housing needs and actions needed to remove those barriers to align with statute. Guidance on completing this requirement can be found in chapter 4 of [Guidance for Updating Your Housing Element](#) (pg. 52-68), and the [Adequate Provisions checklist](#).

This list of actions should remain separate from adopted policies and written with sufficient specificity so that completion can be clearly demonstrated. Including a completed [Adequate Provisions](#) checklist is one way to demonstrate consistency with this requirement. For barriers related to development regulations, changes to regulations must be made and adopted with the periodic update. For barriers related to programs or other actions, Commerce recommends these actions be scheduled for implementation within the next one to three years.

As a friendly reminder, copies of adopted amendments shall be submitted to Commerce within ten days after final adoption ([RCW 36.70A.106\(2\)](#)).

Again, we appreciate the opportunity to work with the County and provide comments on the proposed amendments. We are available for technical assistance and, if requested, can attend upcoming meetings with your Planning Commission and/or Council. If you wish to discuss any of the comments presented in this letter, you may reach me at Lexine.long@commerce.wa.gov or 360-480-4498.

Sincerely,



Lexine Long
Senior Planner, AICP
Growth Management Services

cc:

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