

WHATCOM COUNTY PLANNING COMMISSION
Findings of Fact and Reasons for Action, Conclusions, and
Recommendations

Periodic Update

Whatcom County Zoning Map Amendments associated with City of
Blaine's Urban Growth Area Proposal under 2025 Comprehensive
Plan Periodic Update

WHEREAS, The Growth Management Act requires Whatcom County to periodically review and update its comprehensive plan and development regulations to ensure compliance with the requirements of the GMA under RCW [36.70A.130](#)(1); and

WHEREAS, The Washington Administrative Code (WAC) requires development regulations to be internally consistent, and be consistent with and implement the comprehensive plan under WAC [365-196-500](#); and

WHEREAS, Zoning Maps are considered an official control, and the GMA defines "Development Regulations" as "...the controls placed on development or land use activities by a county or city, including, but not limited to, zoning ordinances...official controls..." under RCW [36.70A.030](#).

WHEREAS, The Whatcom County Planning Commission reviewed and considered Growth Management Act requirements, staff recommendations, City recommendations, and public comments; and

WHEREAS, The Planning Commission hereby adopts the following findings of fact and reasons for action:

FINDINGS OF FACT AND REASONS FOR ACTION

1. The County Council docketed PLN2023-00001 to implement development regulation updates associated with the 2025-26 periodic update of the Whatcom County Comprehensive Plan, as required under RCW [36.70A.130](#); and
2. A 60-day notice of the proposed zoning map amendments was submitted to Washington State Department of Commerce on February 17, 2026; and
3. Recommended zoning map amendments associated with 2025-26 periodic update of the Whatcom County Comprehensive Plan, and City of Blaine De-Annexation action of subject area, were studied under the [Whatcom County Comprehensive Plan Environmental Impact Statement \(EIS\)](#) issued on August 22, 2025 under file number SEPA2024-00001; and

4. The Planning Commission held a duly noticed public hearing on the proposed zoning map amendments on February 26, 2026;
5. The Planning Commission supports two (2) of the three (3) rezone requests as follows, which has been determined to be consistent with the goals and policies of the 2025-26 periodic update of the Whatcom County and City of Blaine Comprehensive Plans, and GMA Planning Goals codified in RCW [36.70.020](#):
 - a. The Planning Commission supports PDS's recommendation to zone the subject pending De-Annexed area, approximately 573 as "Rural 1 dwelling unit/10-acres" (R-10A) after return to County land base; and
 - b. The Planning Commission supports PDS's recommendation to maintain the current zoning in the East Blaine UGA as "Urban Residential-4" (UR-4) pending a high-level study of the critical areas and public outreach; and
 - c. The Planning Commission does not support PDS's recommendation to rezone the south Blaine "Dakota Creek" UGA from UR-4 to R-10A, if removal of UGA designation is approved by County Council; and
6. The Planning Commission instead recommends County Council consider maintaining the Dakota Creek UGA designation, or if they do not, adopt the highest potential density available in the rural designation. The recommended zoning map amendments are consistent with the following GMA Planning Goals under RCW [36.70.020](#):
 - d. Number 1: *"Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner"* (RCW [36.70A.020](#)(1)); and
 - e. Number 2: *"Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development"* (RCW [36.70A.020](#)(2)); and
 - f. Number 5, *"Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities"* (RCW [36.70A.020](#)(5)); and
 - g. Number 11, *"Citizen participation and coordination. Encourage the involvement of citizens in the planning process and ensure coordination between communities and jurisdictions to reconcile conflicts"* (RCW [36.70A.020](#)(11));
6. The proposed zoning map amendments are part of the GMA required periodic update pursuant to RCW [36.70A.130](#). The recommended zoning map amendments are consistent with the 2025-26 periodic update of the Whatcom County Comprehensive Plan, Countywide Planning Policies, and Blaine Interlocal

agreement;

7. The recommended zoning map amendments will take effect 10-calendar days after signature of Ordinance by the County Executive, or as follows:
 - a. The zoning map amendment for the pending de-annexed area, approximately 573-acres, shall only take effect upon finalization of de-annexation and return to County land base; per Article 2 of the Whatcom County Charter Section [2.30](#); and
 - b. The zoning map amendment for the "Dakota Creek" UGA, approximately 37-acres, shall only take effect upon removal of UGA status of the subject area by County Council; per Article 2 of the WC Charter Section [2.30](#).

CONCLUSIONS

1. The recommended amendments are in the public interest.
2. The recommended amendments do not include, or facilitate, spot zoning.
3. The recommended amendments are consistent with applicable approval requirements for zoning map amendments under WCC [22.10.060](#).
4. The recommended amendments are consistent with the Planning Goals of the Growth Management Act under RCW [36.70A.020](#).

RECOMMENDATIONS

The Whatcom County Planning Commission recommends approval to:

1. Zone the subject pending De-Annexed area, approximately 573 as "Rural 1 dwelling unit/10-acres" (R-10A) after return to County land base; and
2. Maintain the current zoning in the East Blaine UGA as "Urban Residential-4" (UR-4) pending a high-level study of the critical areas and public outreach; and
3. The Planning Commission recommends County Council consider maintaining the Dakota Creek UGA designation, or if they do not, adopt the highest potential density available in the rural designation.

WHATCOM COUNTY PLANNING COMMISSION

X

Daniel Dunne
Chair

X

Aileen Kogut-Aguon
Secretary

Commissioners voted to recommend approval on February 26, 2026 (vote was 5-1, with 0 members abstaining and 1 member absent). Members present at the meeting when the vote was taken: Matthew Berry, Rud Browne, Daniel Dunne, Jim Hansen, Dominic Mocerri, and Scott Van Dalen.

WHATCOM COUNTY PLANNING COMMISSION **Findings of Fact, Reasons for Action, Conclusions & Recommendations**

Whatcom County Zoning Map Amendments under the 2025 Periodic Update of the Whatcom County Comprehensive Plan in Urban Growth Areas and Rural Lands

WHEREAS, under the Washington State Growth Management Act (GMA), Whatcom County is required to periodically review and update its Comprehensive Plan and development regulations to ensure compliance with the GMA, codified in Revised Code of Washington (RCW) section 36.70A.130(1); and

WHEREAS, the Washington Administrative Code (WAC) requires that development regulations be consistent with and implement the Comprehensive Plan pursuant to WAC 365-196-500; and

WHEREAS, Zoning Maps are an official control and therefore constitute a development regulation pursuant to RCW 36.70A.030; and

WHEREAS, the Whatcom County Planning Commission reviewed and considered GMA requirements, Whatcom County Planning and Development Services and City recommendations, and public comments; and

WHEREAS, the Planning Commission hereby adopts the following Findings of Fact and Reasons for Action:

FINDINGS OF FACT AND REASONS FOR ACTION

1. The County Council docketed PLN2023-00001 to implement development regulation updates associated with the 2025-26 periodic update of the Whatcom County Comprehensive Plan as required pursuant to RCW 36.70A.130; and
2. A "Notice of Intent to Adopt Development Regulations", requesting expedited review, was submitted for the proposed zoning map amendments to the Washington State Department of Commerce on April 14, 2026; and
3. The Planning Commission held a duly noticed public hearing on the proposed zoning map amendments on April 23, 2026; and

4. The recommended zoning map amendments associated with the 2025-2026 periodic update of the Whatcom County Comprehensive Plan were studied under the associated Environmental Impact Statement issued on August 22, 2025, under file number SEPA2024-00001; and
5. The proposed zoning map amendments are part of the 2025-2026 periodic update pursuant to RCW 36.70A.130, and are consistent with the goals and policies of the current Comprehensive Plan and those proposed for adoption under the update.
6. Adoption of the amendments implements applicable requirements under the GMA pursuant to RCW 36.70A.070 and 36.70A.130; and
7. The recommended zoning map amendments are consistent with the following GMA Planning Goals under RCW 36.70A.020:
 - Number 1: "Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner"; and
 - Number 2: "Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development"; and
 - Number 4: "Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock"; and
 - Number 5: "Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities"; and
 - Number 8: "Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forestlands and productive agricultural lands, and discourage incompatible uses"; and
 - Number 9: "Retain open space and green space, enhance recreational opportunities, enhance fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities"; and
 - Number 10: "Protect and enhance the environment and enhance the state's high quality of life, including air and water quality, and the availability of water"; and
 - Number 11: "Citizen participation and coordination. Encourage the involvement of citizens in the planning process and ensure coordination between communities and jurisdictions to reconcile conflicts".

CONCLUSIONS

1. The recommended amendments are in the public interest; and
2. The recommended amendments do not include or facilitate spot zoning; and
3. The recommended amendments are consistent with applicable approval requirements for zoning map amendments under WCC [22.10.060](#); and
4. The recommended amendments are consistent with the Planning Goals of the Growth Management Act under RCW [36.70A.020](#).

RECOMMENDATIONS

The Planning Commission makes the following recommendations to the County Council:

1. Consider the Planning Commission's discussion of the proposed zoning map amendments, as shown in Exhibit 1 within the Bellingham UGA, as documented in the April 23, 2026 minutes, as the Commission was unable to agree on a recommendation for the zoning map amendments related to Bellingham's UGA; and
2. Approval of the proposed zoning map amendments within the Everson UGA, as shown in Exhibit 2:
 - a. Vote was 7 (Ayes) – 0 (Nays); and
3. Approval of the proposed zoning map amendments within the Nooksack UGA, shown in Exhibit 3:
 - a. Vote was 7 (Ayes) – 0 (Nays); and
4. Approval of the proposed zoning map amendments within the Cherry Point UGA, as shown in Exhibit 4:
 - a. Vote was 6 (Ayes) – 0 (Nays) -1 (Absent); and
5. Approval of the proposed zoning map amendments within the Birch Bay UGA, as shown in Exhibit 5:
 - a. Vote was 5 (Ayes) – 1 (Nays) -1 (Abstain); and
6. Consider the attached letter from the Birch Bay Advisory Committee, supported by the Planning Commission, public comment received in relation to this meeting on the Birch Bay UGA, and the Planning Commission's interest in reconsideration of the Birch Bay UGA boundaries and land capacity analysis:
 - a. Vote was 5 (Ayes) – 1 (Nays) -1 (Abstain); and

April 23, 2026 PC Meeting Findings

7. Approval of the proposed zoning map amendments within the Columbia Valley UGA, as shown in the attached corrected Exhibit 6:
 - a. Vote was 5 (Ayes) – 2 (Nays); and
8. Approval of the proposed zoning map amendments within the Hinote's Corner LAMIRD, as shown in Exhibit 7:
 - a. Vote was 7 (Ayes) – 0 (Nays); and
9. Approval of the proposed zoning map amendments within the Pole & Guide Meridian LAMIRD, as shown in Exhibit 8:
 - a. Vote was 7 (Ayes) – 0 (Nays); and
10. Approval of the proposed zoning map amendments within the Custer LAMIRD, as shown in Exhibit 9:
 - a. Vote was 7 (Ayes) – 0 (Nays); and

WHATCOM COUNTY PLANNING COMMISSION

Signed by:

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Daniel Dunne, Chair

Signed by:

2698EFC1750444F...

Aileen Kogut-Aguon, Coordinator

Members present at the meeting when the votes were taken, as documented above: Matthew Berry, Rud Browne, Daniel Dunne, Dominic Mocerri, Scott Van Dalen, Jeremy Thompson, and Jim Hansen.

WHATCOM COUNTY PLANNING COMMISSION
Findings of Fact, Reasons for Action, Conclusions &
Recommendations

**Whatcom County Zoning Map & Code Amendments under
the 2025-2026 Periodic Update of the Whatcom County
Comprehensive Plan Under the Growth Management Act**

WHEREAS, every ten years as part of the periodic update, RCW [36.70A.130](#)(1)(a) requires Whatcom County to take legislative action to review and, if needed, revise its comprehensive plan and development regulations to comply with the requirements of Chapter [36.70A](#) RCW (the Growth Management Act); and

WHEREAS, Zoning Code and Maps are an official control and therefore constitute development regulations pursuant to RCW [36.70A.030](#); and

WHEREAS, the Washington Administrative Code (WAC) requires that development regulations be consistent with and implement the Comprehensive Plan pursuant to WAC [365-196-500](#); and

WHEREAS, the Whatcom County Planning Commission reviewed and considered GMA requirements, Whatcom County Planning and Development Services (PDS) recommendations, and public comments; and

WHEREAS, the Planning Commission hereby adopts the following Findings of Fact and Reasons for Action:

FINDINGS OF FACT AND REASONS FOR ACTION

1. The County Council docketed PLN2023-00001 to implement development regulation updates associated with the 2025-26 periodic update of the Whatcom County Comprehensive Plan as required pursuant to RCW [36.70A.130](#); and
2. A "Notice of Intent to Adopt Development Regulations" requesting expedited review was submitted to the Washington State Department of Commerce on May 6, 2026, for the proposed amendments. It was assigned Submittal ID Number 2026-S-12796 and granted expedited review on May 21, 2026; and
3. The Planning Commission held a duly noticed public hearing on the proposed zoning code and map amendments on May 14, 2026; and

4. The recommended amendments associated with the 2025-2026 periodic update of the Whatcom County Comprehensive Plan were studied under the associated [Environmental Impact Statement](#) issued on August 22, 2025, under file number SEPA2024-00001; and
5. The proposed amendments are part of the 2025-2026 periodic update pursuant to RCW [36.70A.130](#), and are consistent with the goals and policies of the current Comprehensive Plan and those proposed for adoption under the update.
6. The State legislature found that order to meet the goal of 1,000,000 new homes statewide by 2044, and enhanced quality of life and environmental protection, innovative housing policies will need to be adopted and that increasing housing options that are more affordable to various income levels is critical to achieving the state's housing goals, including those established by the legislature in Engrossed Second Substitute House Bill No. 1220 (chapter 254, Laws of 2021); and
7. Adoption of the Zoning Code amendments implements the Growth Management Act's mandatory housing element for Comprehensive Plans, pursuant to RCW [36.70A.070](#) and RCW [36.70A.130](#); and
8. The proposed amendments are consistent with the following GMA Planning Goals under RCW [36.70.020](#):
 - a. Number 1: *"Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner"*; and
 - b. Number 2: *"Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development"*; and
 - c. Number 4: *"Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock."*
 - d. Number 5: *"Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities"*; and
 - e. Number 9: *"Retain open space and green space, enhance recreational opportunities, enhance fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities."*; and

- f. Number 10: "Protect and enhance the environment and enhance the state's high quality of life, including air and water quality, and the availability of water."; and
- g. Number 11: "Citizen participation and coordination. Encourage the involvement of citizens in the planning process and ensure coordination between communities and jurisdictions to reconcile conflicts".

CONCLUSIONS OF LAW

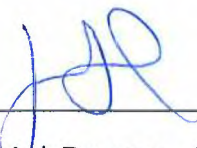
1. The recommended code and map amendments are in the public interest.
2. The recommended amendments do not include or facilitate spot zoning.
3. The recommended map amendments are consistent with applicable approval requirements for zoning map amendments under WCC [22.10.060](#).
4. The recommended code amendments implement and are internally consistent with the updated associated goals and policies of the 2025-2026 Comprehensive Plan pursuant to RCW [36.70A.070](#), RCW [36.70A.130](#), and WAC [365-196-500](#).
5. The recommended amendments are consistent with the Washington State Growth Management Act (RCW [36.70A](#)) and its Planning Goals (RCW [36.70A.020](#)).

RECOMMENDATIONS

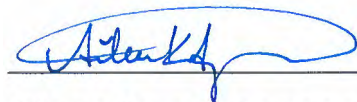
The Planning Commission makes the following recommendations to the County Council:

1. Approval of the proposed Zoning Code Amendments, relating to additional adequate provisions for housing availability, as shown in Exhibit 1:
 - a. Vote was 8 (Ayes) – 0 (Nays); and
2. Approval of the proposed Lummi Island Zoning Map Amendment, to remove a 25-acre area of the "Mineral Resource Special District Overlay" as shown in Exhibit 2:
 - a. Vote was 8 (Ayes) – 0 (Nays); and

WHATCOM COUNTY PLANNING COMMISSION



Daniel Dunne, Chair



Aileen Kogut-Aguon, Coordinator

Members present at the meeting when the votes were taken, as documented above: Selena Knoblauch, Matthew Berry, Rud Browne, Daniel Dunne, Dominic Mocerri, Scott Van Dalen, Jeremy Thompson, and Jim Hansen.