

Whatcom County

2025 Comprehensive Plan HB 1220 and Housing Needs by Income Band

Elected Officials Meeting | December 4, 2024

Housing Allocation & HB1220 Overview



HB 1220 amended the GMA in 2021 to require that jurisdictions “plan for and accommodate housing affordable to **all economic segments** of the population of the state”



Commerce Housing for All Planning Tool (HAPT) generates **total Countywide need** by income band based on population projections.



Housing targets by income band are then **allocated** using the HAPT to UGAs and Rural & Resource Lands based on shares of countywide growth.



Jurisdictions must show **land capacity** to accommodate the units through zoning, and document potential **barriers to production** and **racially disparate impacts** in housing policy.



Income Bands

- County and Cities **must plan** for Countywide housing targets by income band generated by the HAPT.
- HAPT methodology includes housing needed for a **variety of reasons**:



- Income band allocations are **not predictive forecasts**, but the Legislature requires cities and counties to show capacity for these units to plan for future housing **availability** and **affordability**.
- The County and Cities, with the assistance of the consultants, have been working on allocating housing units to UGAs and Rural & Resource Lands in 2024.

Land Capacity

- Cities and County must show **capacity** for units that meet allocations at each income level
- Capacity is correlated with zoning:
 - **Lowest-income households (0-80% AMI)** served by housing in areas zoned for medium to large scale multifamily development (including subsidized housing).
 - **Moderate-income households (80-120% AMI)** served by apartments and smaller “middle housing” types such as 2-3-4-plexes.
 - **Higher-income households (120% AMI+)** served by single-family detached housing.
 - **ADUs and Middle Housing** can serve a range of moderate incomes.
- **Not all housing will build-out at these income levels, but jurisdictions must demonstrate that these housing types can be built under current or proposed zoning to meet targets.**



Adequate Provisions

- In addition to capacity, Commerce asks jurisdictions to analyze housing production trends to identify **potential barriers** to production in four categories:
 - Development regulations
 - Process obstacles
 - Limited land availability and environmental constraints
 - Funding gaps
- Commerce provides matrices for this analysis:

1. Review housing production trends to determine if a barrier exists (If yes, then proceed to next step)

2. Gather information to determine what kind(s) of barriers exist

3. Identify and document appropriate programs and actions to overcome each barrier identified

OFM Medium Allocations

- Net New Population, Housing, and Employment Allocations using OFM Medium Population Projections:

Draft 2023-2045 Allocations: Alternative 1 (OFM / Technical Report Middle)						
	Population	Population Share	Housing Units	Housing Unit Share	Employment	Employment Share
Bellingham City & UGA	24,158	42.4%	15,219	48.7%	15,172	62.5%
Birch Bay UGA	2,313	4.1%	936	3.0%	124	0.5%
Blaine City & UGA	2,774	4.9%	1,461	4.7%	701	2.9%
Cherry Point UGA	0	0.0%	0	0.0%	493	2.0%
Columbia Valley UGA	988	1.7%	447	1.4%	13	0.1%
Everson City & UGA	933	1.6%	433	1.4%	203	0.8%
Ferndale City & UGA	7,262	12.8%	3,308	10.6%	2,141	8.8%
Lynden City & UGA	6,665	11.7%	3,552	11.4%	1,799	7.4%
Nooksack City & UGA	352	0.6%	190	0.6%	79	0.3%
Sumas City & UGA	697	1.2%	476	1.5%	150	0.6%
Rural and Resource Lands	10,773	18.9%	5,198	16.6%	3,403	14.0%
Total	56,915	100.0%	31,220	100.0%	24,279	100.0%

OFM Medium Allocations by Income Band

- Net New Housing allocations using OFM Medium Population Projections:

DRAFT HOUSING UNITS BY INCOME BAND 2023-2045: ALTERNATIVE 1 (OFM MEDIUM)

	% of Total	Total	0-30%							Emergency Housing Needs
			Non-PSH	PSH	>30-50%	>50-80%	>80-100%	>100-120%	>120%	
Bellingham City & UGA	48.75%	15,219	4,711	1,901	3,864	760	709	1,119	2,155	253
Birch Bay UGA	3.00%	936	290	117	238	47	44	69	132	16
Blaine City & UGA	4.68%	1,461	452	182	371	73	68	107	207	24
Cherry Point UGA	0.00%	-1	0	0	0	0	0	0	0	0
Columbia Valley UGA	1.43%	447	138	56	113	22	21	33	63	7
Everson City & UGA	1.39%	433	134	54	110	22	20	32	61	7
Ferndale City & UGA	10.60%	3,308	1,024	413	840	165	154	243	468	55
Lynden City & UGA	11.38%	3,552	1,100	444	902	177	166	261	503	59
Nooksack City & UGA	0.61%	190	59	24	48	10	9	14	27	3
Sumas City & UGA	1.53%	476	147	59	121	24	22	35	67	8
LAMIRDs and Rural Areas	16.65%	5,198	0	0	45	855	301	305	3,692	87
Total	100.00%	31,220	8,055	3,250	6,652	2,155	1,514	2,218	7,376	520

City-County Proposed Allocations

- Draft proposed net new population, housing, and employment allocations presented to the Whatcom County Planning Commission in November:

Draft 2023-2045 Allocations: Alternative 2 (County/City Scenario)						
	Population	Population Share	Housing Units	Housing Unit Share	Employment	Employment Share
Bellingham City & UGA	30,310	44.8%	18,390	51.1%	19,384	59.9%
Birch Bay UGA	2,662	3.9%	1,051	2.9%	450	1.4%
Blaine City & UGA	3,500	5.2%	1,774	4.9%	1,092	3.4%
Cherry Point UGA	0	0.0%	0	0.0%	1,200	3.7%
Columbia Valley UGA	1,137	1.7%	502	1.4%	350	1.1%
Everson City & UGA	1,408	2.1%	610	1.7%	602	1.9%
Ferndale City & UGA	10,961	16.2%	4,659	12.9%	3,337	10.3%
Lynden City & UGA	6,665	9.9%	3,535	9.8%	1,799	5.6%
Nooksack City & UGA	995	1.5%	433	1.2%	232	0.7%
Sumas City & UGA	1,000	1.5%	643	1.8%	500	1.5%
Rural and Resource Lands	9,000	13.3%	4,416	12.3%	3,403	10.5%
Total	67,638	100.0%	36,013	100.0%	32,349	100.0%

Proposed Allocations by Income Band

- Draft proposed net new housing allocations presented to the Whatcom County Planning Commission in November:

DRAFT HOUSING UNITS BY INCOME BAND 2023-2045: ALTERNATIVE 2 (COUNTY/CITY SCENARIO)

	% of Total	Total	0-30%							Emergency Housing Needs
			Non-PSH	PSH	>30-50%	>50-80%	>80-100%	>100-120%	>120%	
Bellingham City & UGA	51.06%	18,390	4,978	1,944	4,158	1,197	989	1,400	3,725	299
Birch Bay UGA	2.92%	1,051	285	111	238	68	56	80	213	17
Blaine City & UGA	4.93%	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	1.39%	502	136	53	113	33	27	38	102	8
Everson City & UGA	1.70%	610	165	65	138	40	33	46	124	10
Ferndale City & UGA	12.94%	4,659	1,261	492	1,053	303	250	355	944	76
Lynden City & UGA	9.82%	3,535	957	374	799	230	190	269	716	58
Nooksack City & UGA	1.20%	433	117	46	98	28	23	33	88	7
Sumas City & UGA	1.79%	643	174	68	145	42	35	49	130	10
LAMIRDS and Rural Areas	12.26%	4,416	0	0	45	855	304	307	2,905	72
Total	100.00%	36,013	8,553	3,340	7,189	2,912	2,002	2,712	9,305	586

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<https://www.whatcomcounty.us/4218/2025-Comprehensive-Plan-Updates>

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