



## Memorandum

**TO:** The Honorable Whatcom County Council  
**FROM:** Matt Aamot and Maddie Schacht, Senior Planners  
**THROUGH:** Mark Personius, Director  
**DATE:** May 19, 2026  
**SUBJECT:** Comprehensive Plan Update – Appendix K  
Adequate Provisions relating to Housing

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On January 22, 2026, the Whatcom County Planning Commission issued "*Findings of Fact and Reasons for Action, Conclusions, and Recommendations*" regarding the periodic update to the Comprehensive Plan, which is now under review by the Whatcom County Council.

The Washington State Department of Commerce issued a letter dated March 30, 2026, recommending that the County include a completed "[Adequate Provisions Checklist](#)" as part of the update.

The "[Adequate Provisions Checklist](#)", created by the Washington State Department of Commerce and included in its "[Guidance for Updating Your Housing Element](#)" handbook (updated January 2026), is a tool to help jurisdictions identify and document barriers and actions to achieve housing availability pursuant to [RCW 36.70A.070\(2\)\(d\)](#).

As recommended by the State, Whatcom County Planning and Development Services (PDS) proposed adopting an accessible version of the "[Adequate Provisions Checklist](#)" as Comprehensive Plan Appendix K as part of the periodic update.

The Planning Commission held a public hearing on May 14, 2026 and recommended approval of Appendix K with modifications (attached, with Planning Commission modifications shown in Track Changes mode).

This Checklist addresses barriers to:

- Moderate Density housing; and
- Low-Rise or Mid-Rise housing; and
- Permanent supportive housing (PSH) and emergency housing; and
- Accessory dwelling units.

The State Guidance also includes a "*Checklist for local option tools for addressing affordable housing funding gaps*" (Exhibit B5, see page 8). This Checklist has already been presented as part of the periodic update in Appendix J (*Subsidized Housing Needs and Funding*).

The following findings relating to new Appendix K will be inserted in the draft ordinance for the Comprehensive Plan Update for consideration by Council (alongside findings for the other Comprehensive Plan chapters and appendices):

1. The Growth Management Act (GMA), codified under RCW 36.70A.070(2), requires local governments to include a housing element in their comprehensive plans that makes adequate provisions for existing and projected housing needs of all economic segments of the community.
2. The State Department of Commerce's "Guidance for Updating Your Housing Element" handbook (updated January 2026) includes an "*Adequate Provisions Checklist*" to help local governments meet housing element requirements under the GMA, as set forth in RCW 36.70A.070(2)(d).
3. Appendix K (Adequate Provisions Checklist) identifies barriers and actions to achieve housing availability for moderate-density, low-rise, and mid-rise housing, permanent supportive and emergency housing, and accessory dwelling units.

Thank you for your consideration of this matter. We look forward to discussing it with you.