



WHATCOM COUNTY

WASHINGTON

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TO: The Honorable Whatcom County Council

FROM: Matt Aamot, Senior Planner

THROUGH: Mark Personius, Director

RE: 2025 Comp Plan Update – Land Capacity Analysis Methodologies

The Growth Management Act (GMA) requires Whatcom County to review and revise its Comprehensive Plan and development regulations in 2025 ([RCW 36.70A.130](#)). Washington Administrative Code (WAC) 365-196-325(1)(a) states:

RCW [36.70A.115](#) requires counties and cities to ensure that, taken collectively, comprehensive plans and development regulations provide sufficient capacity of land suitable for development within their jurisdictions to accommodate their allocated housing and employment growth, including the accommodation of, as appropriate, the medical, governmental, educational, institutional, commercial, and industrial facilities related to such growth, as adopted in the applicable countywide planning policies and consistent with the 20-year population forecast from the office of financial management. To demonstrate this requirement is met, counties and cities must conduct an evaluation of land capacity sufficiency that is commonly referred to as a "land capacity analysis."

The County and cities have conducted land capacity analyses in past comprehensive plan updates. However, [House Bill 1220](#), passed in the 2021 legislative session, places more emphasis on planning for and accommodating housing that is affordable to all economic segments of the community. The GMA now requires local comprehensive plans to identify:

. . . sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes ([RCW 36.70A.070\(2\)\(c\)](#)).

Therefore, the land capacity analysis methodology now must explicitly address housing for moderate, low, very low, and extremely low-income households. Additionally, there is a new requirement to analyze land capacity for emergency housing and shelters.

The City/County Planner Group, in conjunction with Leland Consulting Group, has formulated the following documents:

- The draft *Whatcom County Land Capacity Analysis For Permanent Housing and Employment Needs Methodology*; and
- The draft *Whatcom County Comprehensive Plan Land Capacity Analysis Methodology for Emergency Housing*.

These documents outline methods to be used by the County and cities for conducting the land capacity analyses in association with the 2025 comprehensive plan/urban growth area (UGA) updates.

The draft *Whatcom County Land Capacity Analysis For Permanent Housing and Employment Needs Methodology* contains the following sections:

1. Introduction
2. State Requirements
3. Data Collection
4. Land Suitable for Development
5. Reports and Implementation
6. Land Capacity Analysis
7. Definitions
8. Appendix A – GIS Data
9. Appendix B – Bellingham UGA Supplemental Methods

The draft *Whatcom County Comprehensive Plan Land Capacity Analysis Methodology for Emergency Housing* contains the following sections:

1. Introduction
2. Methodology

The County Planning Commission held a public hearing on the Methodologies on July 24, 2025, at which Leland Consulting Group provided an informational presentation.

Leland Consulting Group will also provide an overview of the draft methodologies to the County Council Committee of the Whole on September 9. However, since the methodologies are technical documents that will be administratively approved by the County Planning Director, we are not asking for Council action.

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