

Planning Commission approved draft = Redline
Approved Council amendments = **Green Highlight**

Chapter Three Housing

Introduction

Housing is not only a basic human need; it is a fundamental building block in the development of strong communities. The quality, price and availability of housing have far reaching effects. Housing is an issue of equity, and a healthy community strives to provide housing affordable to households at all income levels.

Every community and neighborhood needs a healthy mix of housing sizes, types and prices, affordable at the wages of the jobs nearby. A balanced mix will have housing costs in sync with wages and incomes.

The built and natural environments must co-exist in balance. Housing should be developed sustainably, in an effort to address housing needs while also protecting and conserving natural resources and mitigating and adapting to worsening climate change related natural hazards like flooding, wildfires, and rising sea levels. Whatcom County must be strategic about where and how it grows and develops. It is important to consider access to or cost of new infrastructure, adjacency to basic needs and services such as health care, education, food, childcare, and jobs, locations that are out of harm’s way and avoid conversion of critical areas, natural resources, and working lands. Housing development should also consider sustainable building materials, energy efficiency, and onsite renewable energy like rooftop solar. In the development of neighborhoods, impacts should be considered and mitigated as well as opportunities for bicycle and pedestrian infrastructure, community gardens, and other community amenities.

Purpose

The purpose of this housing element is to ~~plan~~ foreconsider future needs for housing in Whatcom County by examining existing housing patterns, projected housing needs ~~population growth, and most likely growth scenarios,~~ and ~~accommodate~~ suggest realistic ways to provide for those housing needs within the wishes ~~constraints of housing demand,~~ financial resources of county residents, environmental stewardship, sound public policy, and ~~within~~ the mandates of the Washington State Growth Management Act (GMA).

Commented [MA1]: House Bill 1220 strengthened GMA Goal 4 relating to planning for and accommodating housing (RCW 36.70A.020(4)).

GMA Goals and Countywide Planning Policies

Realization of all the ~~thirteen-fifteen Growth Management Act-GMA~~ goals is fostered by the goals, policies, and action plans in this chapter. Those directly relating to housing will be met with successful adoption of this comprehensive plan chapter. This chapter has been written to satisfy those goals while also meeting the intent of the County-Wide Planning Policies (CWPP) ~~and general guidelines of Visioning Community Value Statements.~~ CWPP's direct the county and its cities to ensure a balance of housing and economic growth consistent with diverse income levels and allowing for a range of housing types and costs. Further, the county and cities can employ innovative techniques providing for a variety of housing types including: single-

Commented [MA2]: These are from the 1990s and are no longer pertinent.

family-detached, multifamily building for both ownership and rental, accessory dwelling units (ADUs), manufactured and modular homes, manufactured and mobile home parks, duplexes, triplexes, fourplexes, townhomes, co-living housing, permanent supportive housing, emergency housing, along with mixed use and increased densities as affordable housing alternatives. ~~Visioning Community Value Statements identify the importance of affordable housing and encourage even distribution of housing affordability and a mix of housing types throughout the county. Growth Management GMA goals, Visioning Community Value Statements,~~ and County-Wide Planning Policies will be served by adoption and implementation of this chapter.

Commented [MA3]: House Bill 1220 indicates that comprehensive plan housing elements are to address a variety of housing types.

GMA Requirements

In 2021, the State legislature approved House Bill 1220 (HB 1220) amending the housing-related requirements for jurisdictions planning under the provisions of the GMA. In accordance with RCW 36.70A.070(2), the Growth Management Act GMA requires that a housing element:

Commented [MA4]: The State Legislature approve House Bill 1220 in 2021, making significant changes to the GMA provisions relating to housing. The text in this section has been updated to summarize these changes.

- Includes an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth, including units for moderate, low, very low, and extremely low-income households, and emergency housing, emergency shelters, and permanent supportive housing;
- Includes a statement of goals, policies, objectives, and mandatory provisions for the preservation, improvement, and development of housing, including single-family residences and, within an urban growth area boundary, moderate density housing options including, but not limited to, duplexes, triplexes, and townhomes;
- Identifies sufficient capacity of land for housing, including, but not limited to, government-assisted housing, housing for low-income families moderate, low, very low, and extremely low-income households, manufactured housing, multi-family housing, and group homes and foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes; ~~and~~
- Makes adequate provisions for existing and projected housing needs of all economic segments of the community, including incorporating consideration for all income brackets, documenting programs and actions needed to achieve housing availability such as gaps in local funding, barriers such as development regulations and other limitations, consideration of housing location in relation to employment location, and consideration of accessory dwelling units in meeting housing needs;
- Identifies local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including zoning that may have a discriminatory effect, disinvestment, and infrastructure availability;

Commented [MA5]: Modification passed by the Planning Commission on 12/18/2025.

- Identifies and implements policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions;
- Identifies areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments; and
- Establishes anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing.

Background Summary

Comprehensive plans have been developed for Whatcom County and each of the cities that lie within its boundaries. Each of these plans contains a housing element that addresses the housing needs of each jurisdiction and offers suggestions for changes that could occur to help meet these needs.

This chapter will overlap many of the ideas put forth in those plans—the problems perceived in each community, their changing demographics, and the directions the communities ~~are seen~~ willing to go to ~~improve the overall situation address the acknowledged housing crisis and the increasingly competing interests that influence the resolution of that crisis.~~ ~~It also incorporates a recent study, t~~The *Whatcom County Housing Needs Analysis* ~~is in Whatcom County Comprehensive Plan Appendix I-2015.~~

Commented [MA6]: Currently in draft form.

Demographic Overview

Whatcom County demographics in general are similar to Puget Sound within the municipal jurisdictions (Bellingham in particular), reflecting the county’s continuing urbanization along the I-5 corridor. Western Washington University, Port of Bellingham, Cherry Point Industrial Zone, and other major regional enterprises have influenced employment, housing, services, and other facilities that have attracted age-specific populations and households.

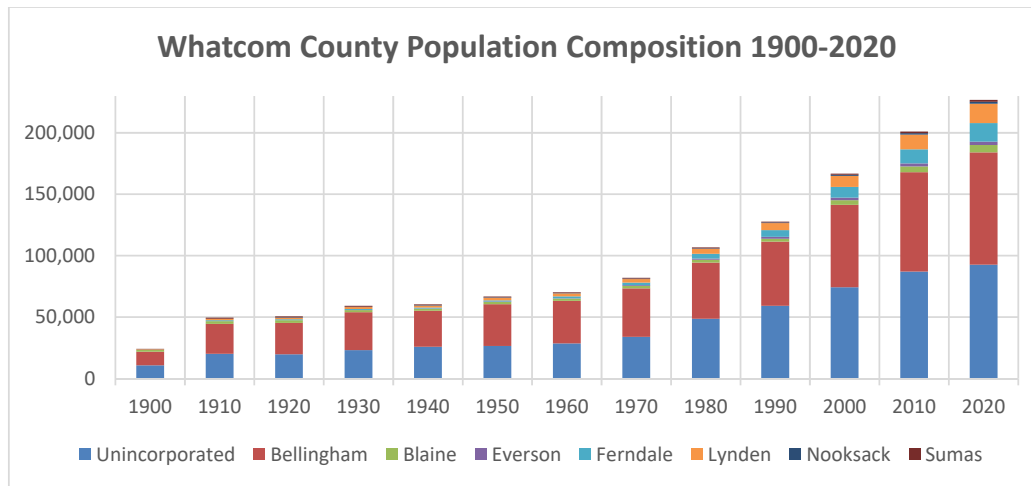
Even so, Whatcom County in total is less urban than Puget Sound with more base industry (agriculture, forestry, and manufacturing) employment, lower incomes, high housing costs, and ~~less ethnic, non-English speaking populations less racially and ethnically diverse communities including households in which English is not the primary language.~~

Specific jurisdictions within Whatcom County reflect the iterative influence of age and household-specific relationships to employment, housing, and services. Where Nooksack, for example, is predominantly married couple family, single-family housing stock, owner occupied, and car dependent; whereas Bellingham includes more non-family households with unrelated individuals, multifamily housing stock, renter occupied, and sees more bike/transit commuting.

Whatcom County’s diverse population is growing steadily. A large portion of our growth is attributable to in-migration as opposed to birth rate. Washington State

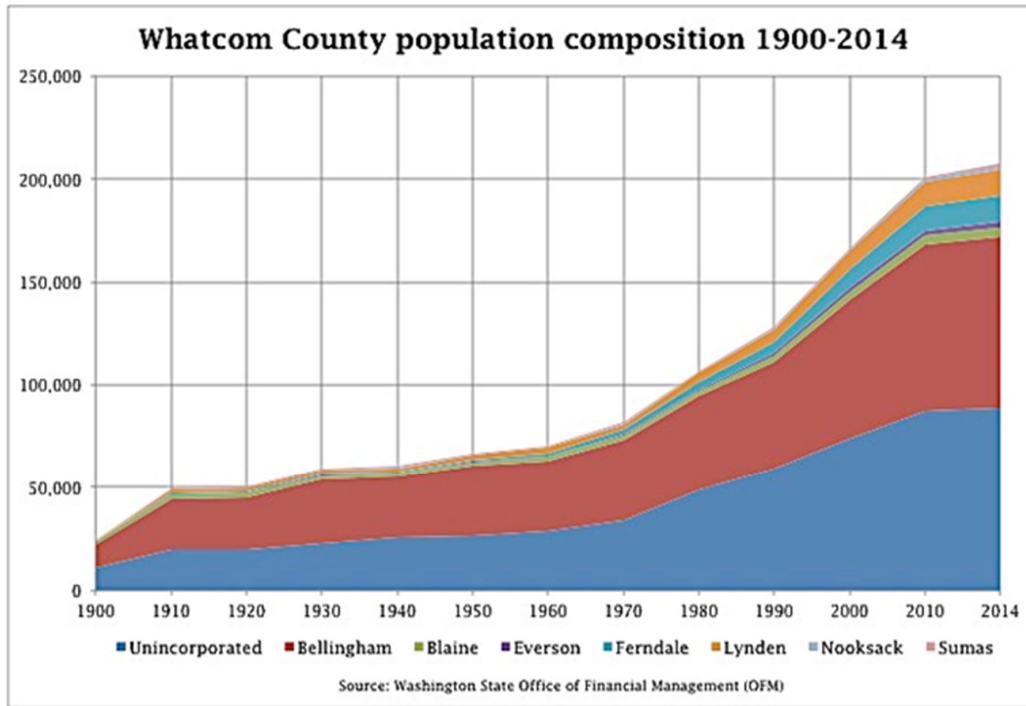
Office of Financial Management (OFM) estimates that net migration into Whatcom County was 15,457 between 2018-2023, representing 98% of population growth in this period (which included the COVID pandemic) projects the number of net migrants into the county will increase from 5,313 persons between 2010-2015 to 14,028 persons 2035-2040. OFM forecasts that 100% of county growth will come from in-migration after 2035. In addition to increasing the number of people living in the County, in-migration is resulting in changes to its demographic makeup. Increased minority, retirement-age, college age and single-parent household populations characterize demographic changes resulting from in-migration.

Figure 1. Whatcom County Population Composition 1900-2020



Source: [Washington State Office of Financial Management \(OFM\), 1900-2020.](#)

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Whatcom County’s future demographics, particularly the composite social characteristics of each municipal jurisdiction, will largely depend on how specific demographic groups are attracted to each municipal jurisdiction by each jurisdiction’s unique economic, land use, transportation, housing conditions, and public **policies**.

Please see [Whatcom County Housing Needs Analysis \(Comprehensive Plan Appendix I\) 2015](#) for more information on demographics.

Commented [MA7]: Currently in draft form.

Income Distribution

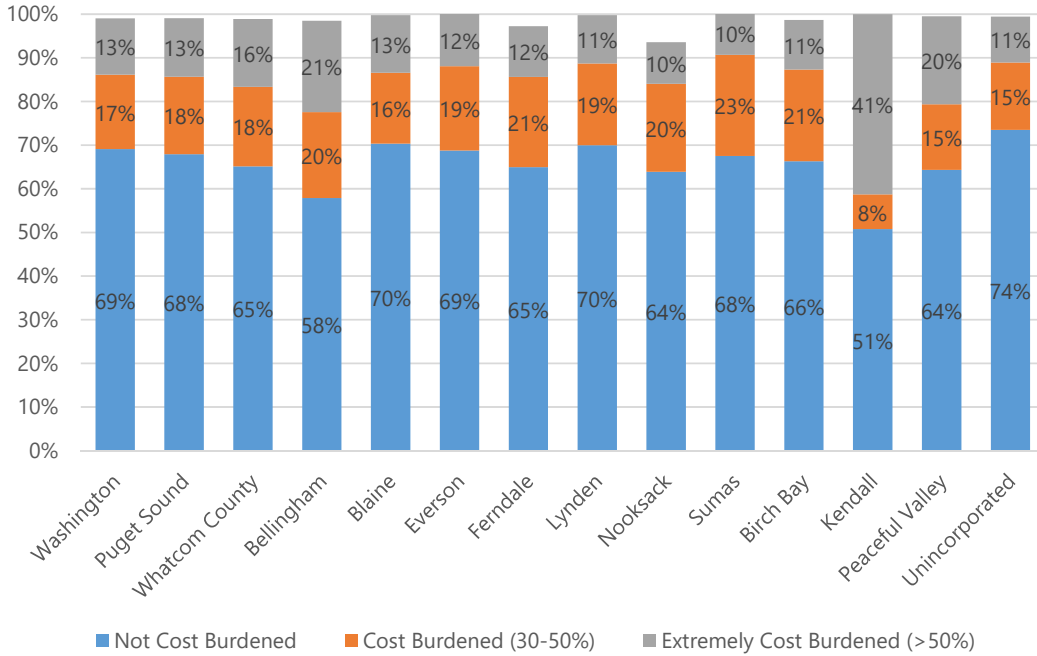
Statistics have shown that as housing prices increased at a faster rate than household incomes, so decreased the ability of Low- to Moderate-Income (LMI) populations to obtain decent housing in Whatcom County. **This has consequentially led to more affordable housing options being developed in rural, unincorporated, underserved, and climate impacted areas that often struggle with adequate infrastructure and access to basic needs such as health care, education, food, childcare, and living wage jobs.**

Significant percentages of extremely low, very low, and low-income households in Whatcom County are paying more for ownership and rent than they can feasibly afford to pay and still have sufficient income for transportation, health care, clothing, food, and the like. The US Department of Housing and Urban Development defines cost burdened households as those spending more than 30 percent of their income on housing costs. Extremely cost burdened households spend more than 50 percent of their income on housing costs. Housing cost burdened households are most prevalent in the lowest income groups but remain a problem in all income groups, particularly those paying more than 50% of income for housing. See the [figurecharts](#)

Commented [MA8]: Definition of “cost burdened” from the draft Housing Needs Analysis.

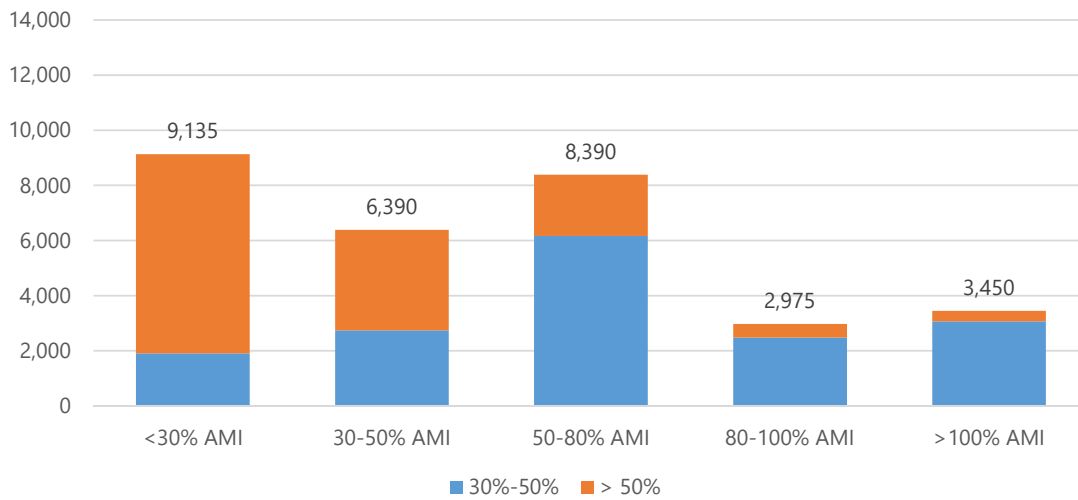
below for the percentage number of households each income group which are housing cost burdened.

Figure 2. Share of Cost Burdened Households, Whatcom County, 2021



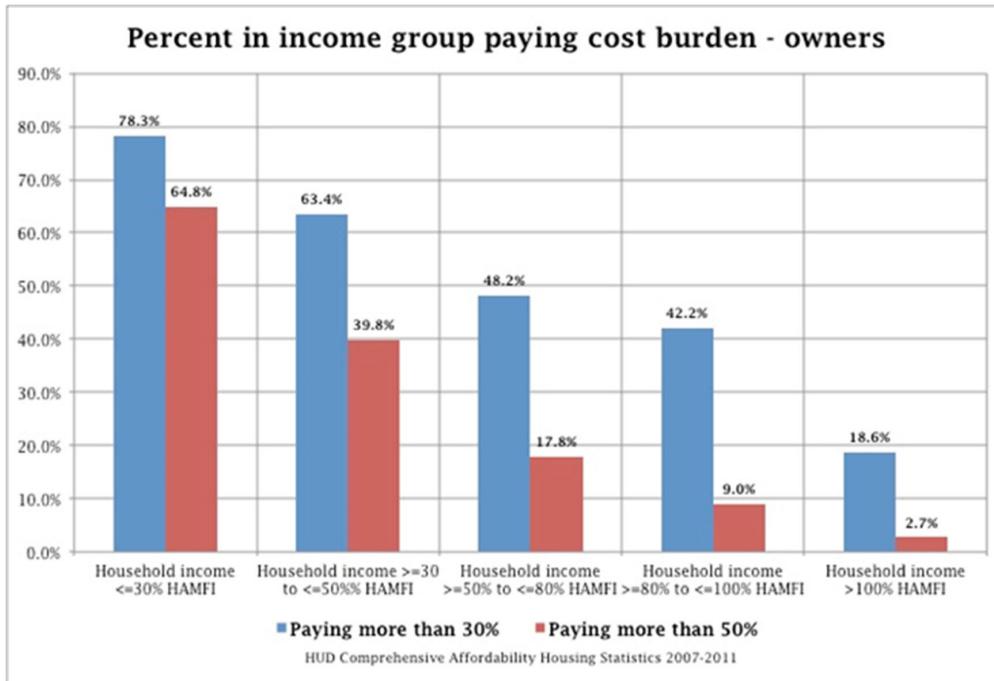
Source: Draft *Whatcom County Housing Needs Analysis* (Leland Consulting Group, 2025).

Figure 3. Cost Burdened Households by Income Level, Whatcom County, 2021

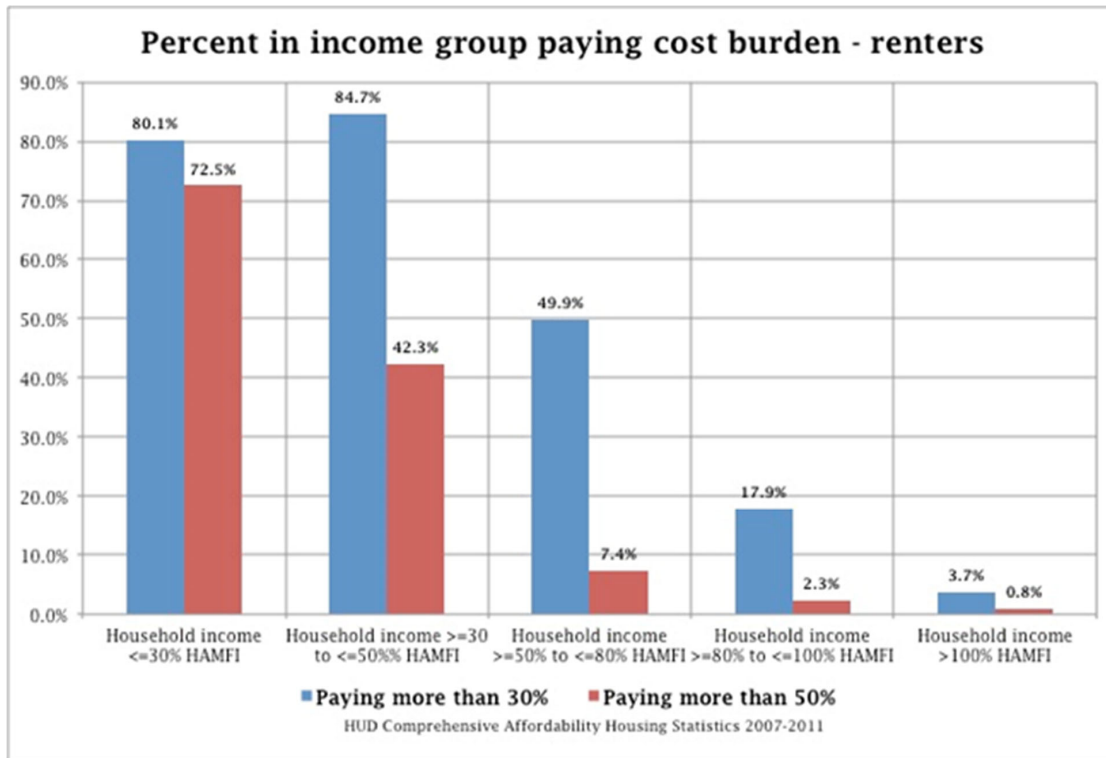


Source: Draft *Whatcom County Housing Needs Analysis* (Leland Consulting Group, 2025). AMI refers to Area Median Income. The 30-50% category refers to households that spend between 30% and 50% of their income on housing costs. The >50% category refers to households that spend greater than 50% of their income on housing costs

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Note: HAMFI is HUD’s Average Median Family Income.

Please see *Whatcom County Housing Needs Analysis 2015-2025* for more information on income distribution and housing cost burden.

Needs

Innovative housing solutions are needed to provide enough housing units to accommodate the County’s growing housing needs **at all income levels in each community**. By the end of the 20-year planning period, Whatcom County will likely experience substantial growth.

While there are many programs that address affordable housing issues in Whatcom County, a growing number of households are in need of assistance, causing increased competition for existing resources. Many of these resources are not available to some jurisdictions that do not meet all of the necessary criteria or cannot produce the required matching funds to participate in certain programs.

~~Between 1990 and 2000, Bellingham’s multi-family housing experienced a 65% increase. In 2009, multi-family housing comprised 50% of the housing in the City. Concern that an increase in rental units may pose a challenge to community development has been expressed in Bellingham’s Consolidated Plan, as rental tenants move frequently.~~

Commented [MA9]: Updated housing information for all cities is included in Appendix I, the Housing Needs Analysis.

Accommodating our future housing need will require substantial public and private sector cooperation, effort, and planning. There is an increasing need for all forms of affordable housing options across the housing continuum, including multi-generational housing, housing that supports aging in place, farmworker housing, and housing with supportive services, so residents can find options that support different household structures, cultural preferences, ages, abilities, and life stages. Types of housing include but are not limited to duplex, triplex, fourplexes, townhomes, multi-family housing, multi-generational housing, flexible floor plans, and smaller single-family houses constructed on smaller lots. These efforts to diversify housing types affordable to all income levels will also support more diverse and inclusive communities accessible to all residents who call Whatcom County home.

Land Capacity to Accommodate Housing Needs Market Inventory and Analysis

The GMA requires the housing element to include an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth, as provided by the State Department of Commerce. In order to identify the number of housing units needed for each jurisdiction, the State Department of Commerce developed the Housing for All Planning Tool (HAPT) spreadsheets for use by local jurisdictions (the County’s consultant modified the tool to address UGAs and limitations on Rural housing under GMA). The overall countywide population figure is inserted in the HAPT, and it calculates the number of housing units that are needed at the various income bands (e.g. low, moderate, high income households) in each UGA and the Rural & Resource Lands outside UGAs. HB1220 requires local jurisdictions to plan for more housing capacity than is needed simply to accommodate projected population growth over the 20-year planning period. There are multiple factors contributing to this additional need, including:

- Additional needed housing to account for a future vacancy rate of 6% by the 2045 planning horizon;
- Housing for existing population experiencing homelessness; and
- Housing for existing cost-burdened households (paying more than 30% of income to housing).

The County and the cities have jointly identified, based upon the HAPT calculations, the housing needs shown in Table 1 below.

It is important to address population growth impacts and housing requirements in Whatcom County over the next 20 year planning period. Comparing the planned (allocated) growth in Table 1 with the UGA population capacities in Chart 1, and comparing the supply of single and multi family dwellings in Chart 2 with the projected housing needs in Chart 3, it appears Whatcom County’s UGAs can accommodate both the number and types of dwellings needed in the next 20 years. It is important to note that the projected housing needs shown in Chart 3 are based

on the assumption that the 2000–2013 growth distribution among housing types will continue. That distribution may change as a result of changing market conditions or jurisdictions’ land use planning policy choices.

Table 1. Whatcom County ~~Housing Needs~~ Population Allocations ~~2023-2045~~2013–2036

	% of Total	Total	0-30%							Emergency Housing Needs
			Non-PSH	PSH	>30-50%	>50-80%	>80-100%	>100-120%	>120%	
Bellingham City & UGA	52.20%	18,390	4,978	1,944	4,158	1,197	989	1,400	3,725	299
Birch Bay UGA	2.78%	981	244	103	216	68	56	80	213	17
Blaine City & UGA	5.04%	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	1.23%	433	95	46	92	33	27	38	102	8
Everson City & UGA	1.73%	610	165	65	138	40	33	46	124	10
Ferndale City & UGA	13.22%	4,659	1,261	492	1,053	303	250	355	944	76
Lynden City & UGA	10.03%	3,535	957	374	799	230	190	269	716	58
Nooksack City & UGA	1.23%	433	117	46	98	28	23	33	88	7
Sumas City & UGA	1.83%	643	174	68	145	42	35	49	130	10
Rural and Resource Lands	10.70%	3,771	0	0	0	731	225	226	2,589	45
Total	100.00%	35,229	8,472	3,325	7,101	2,788	1,923	2,631	8,989	559

Commented [MA10]: The GMA requires local comprehensive plan housing chapters to address the number of housing units necessary to manage growth, including units for the various household income levels (RCW 36.70A.070(2)(a)). The housing numbers in Table 1 are from County Resolution 2025-011. Population growth is addressed in Chapter 1 and does not need to be duplicated in Chapter 3.

	% of Total	Total	Non-PSH	PSH	>30-50%	>50-80%	>80-100%	>100-120%	>120%	Emergency Housing Needs
			0-30%	0-30%						
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
Rural & Resource Lands	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

Commented [KS11]: New chart updated 3/9/26 as a result of 3/3/26 Council motions to amend Table 5, Chapter 1. Per Matt Aamot email 3/9/26.

Commented [KS12]: Table deleted

The housing figures in Table 1 above are from the HAPT and represent the housing needs anticipated between 2023 and 2045. PSH means “Permanent Supportive Housing.” This term is defined in the Growth Management Act at RCW 36.70A.030(33)). The 0-30%, 30-50%, 50-80%, etc. figures refer to Area Median Income (AMI). Emergency housing needs represent the beds needed.

	2013	2036	Projected Growth	Percent of County Growth
Bellingham	92,660	123,710	31,050	44.6%
Birch Bay	7,540	12,822	5,282	7.6%
Blaine	5,171	9,585	4,414	6.3%
Columbia Valley	3,103	4,448	1,345	1.9%
Everson	2,665	3,907	1,242	1.8%
Ferndale	12,758	19,591	6,833	9.8%
Lynden	12,872	19,275	6,403	9.2%
Nooksack	1,435	2,425	990	1.4%
Sumas	1,449	2,323	874	1.3%
Non-UGA	66,104	77,321	11,217	16.1%
Total	205,800	275,450	69,650	100.0%

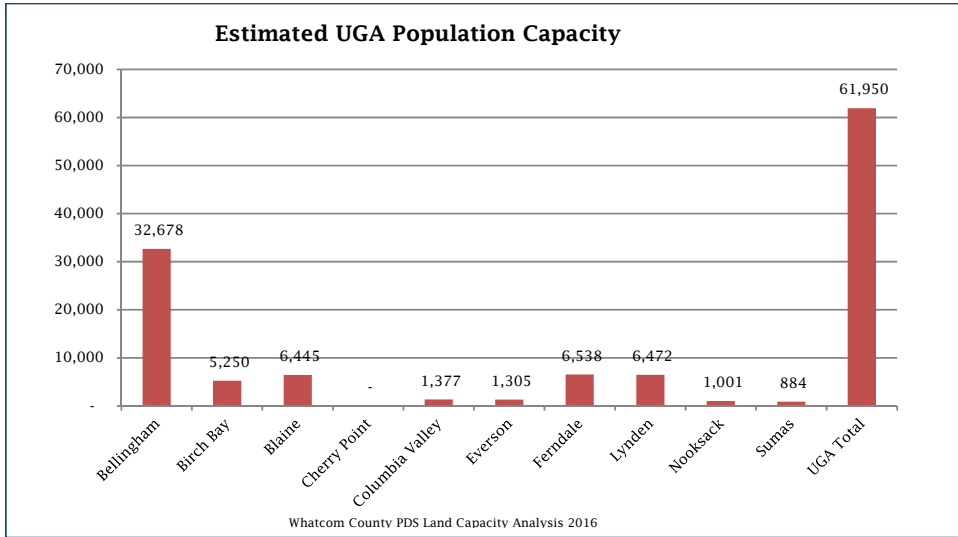
The County and the cities will identify sufficient capacity of land for a healthy mix of home types, sizes, and prices, including but not limited to ownership opportunities for the widest possible range of incomes, income-restricted housing, manufactured housing, multifamily housing, co-living housing, farmworker housing, group homes, foster care facilities, emergency housing, emergency shelters, and permanent supportive housing and other supportive housing types.

The Whatcom County Housing Needs Analysis (Comprehensive Plan Appendix I) shows that each UGA can accommodate the housing needs for the various low, moderate, and high income households in the County.

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Commented [MA13]: This paragraph is consistent with Countywide Planning Policy G.2, which was informed by recommendations of the Whatcom County Housing Advisory Committee (letter dated March 15, 2024).

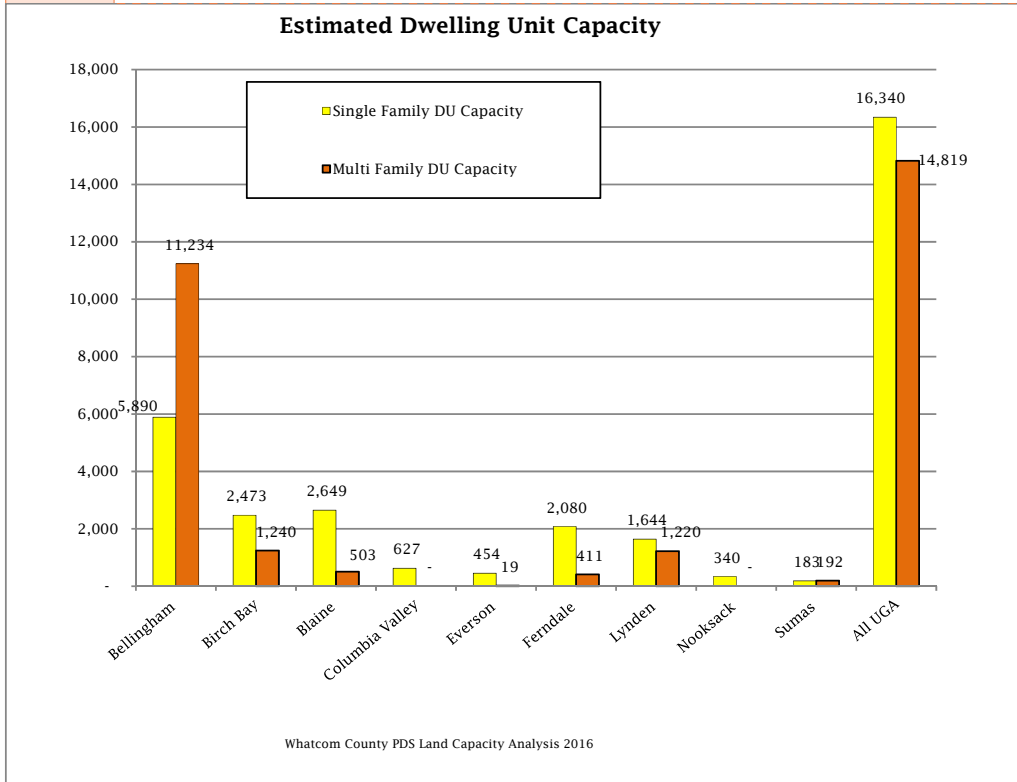
Chart 1



Commented [MA14]: The Washington State Department of Commerce stated in an email dated October 15, 2025 that "showing sufficient land capacity to meet each jurisdiction's or UGA's housing unit allocation demonstrates that the jurisdiction has met its population allocation." The Housing Needs Analysis (Appendix I) contains the Land Capacity Analysis results for housing. Therefore, Chart 1 is being deleted.

Delete chart below

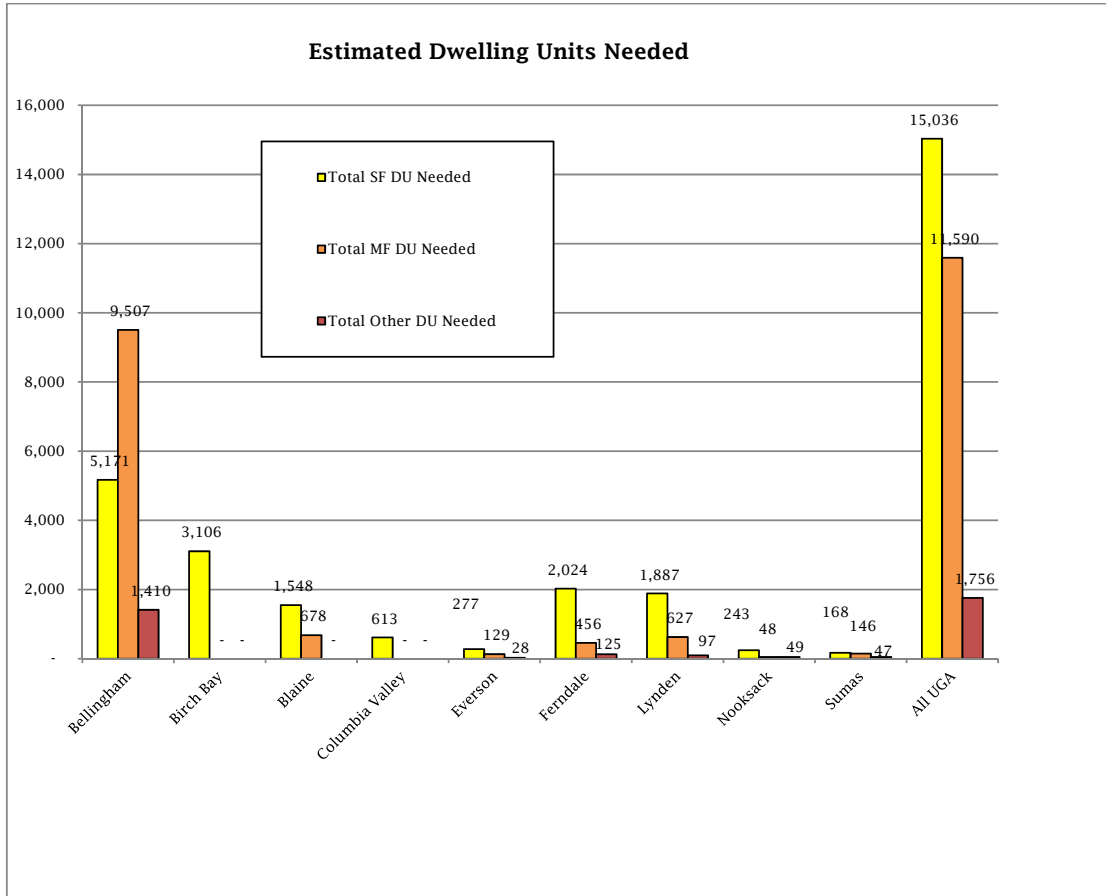
Chart 2



Commented [MA15]: The Housing Needs Analysis (Appendix I) contains the Land Capacity Analysis results for housing. Therefore, Chart 2 is being deleted.

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Chart 3



OFM 2000-2013 Housing Permit Data; WCCP Population Growth Projections

Commented [MA16]: The Housing Needs Analysis (Appendix I) contains the Land Capacity Analysis results for housing. Therefore, Chart 3 is being deleted.

Housing Stability and Access

RCW 36.70A.020(4) requires counties plan for and accommodate housing affordable to all economic segments of the population, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock. Safe, stable, and attainable housing supports strong families, economic resilience, and healthy communities. This chapter focuses on expanding housing choices, improving access to housing near jobs and services, and reducing barriers that prevent residents from securing or maintaining stable housing.

Housing challenges are not experienced equally. Some residents face greater barriers due to income constraints, limited housing supply, location, or market conditions. The County will identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing in accordance with RCW 36.70A.070(2)(e) and work collaboratively with cities, Tribal governments, housing providers, and community partners to promote fair access to housing opportunities throughout the county.

Issues, Goals, and Policies

In order to ~~plan for~~ offer appropriate and affordable housing for everyone in the County, programs and policies designed to meet a variety of housing needs for all economic segments of the community will need to~~can~~ be implemented throughout each neighborhood and community. With the right mix of policy decisions and local programs, we can increase the supply of affordable housing and offer a variety of housing choices, thereby strengthening our communities. Thousands of Whatcom County households do not live in affordable housing and it is recognized that housing scarcity drives up prices. Looking ahead, the incomes of working people in Whatcom County will make affordability one of the County’s biggest challenges. Both public and private investments can be directed into housing that ensures that low- to moderate-income people will be able to continue to live near where they work in the community. (According to the US Department of Housing and Urban Development, ~~in 2015, in Whatcom County a~~ Whatcom County family of four earning ~~\$54,100~~\$76,800 in 2023 was considered low-income, while the median income for a family of four was ~~\$67,600~~\$102,600).¹

Commented [MA17]: Language from the Child & Family Well-being Task Force recommendations dated March 12, 2024.

This Chapter adopts an Adopting an Ambitious but Achievable Affordable overarching Housing Goal to achieve an adequate supply of housing types and sizes that are affordable to all economic segments of the population.

~~Whatcom County and its cities might consider adopting a HOUSING GOAL that sets the bar at a high but achievable level:~~

Commented [MA18]: The deleted language is aspirational only and largely embodied in other goals and policies in Chapter 3.

~~"By the year 2036, every community and neighborhood has a healthy mix of housing sizes, types and prices, affordable at the wages of the jobs nearby. A balanced mix of housing will have housing costs in sync with wages and incomes in the community."~~

To achieve this overarching goal, the following goals and policies are adopted:

Permitting Process Efficiency

Building codes and zoning ordinances, in part, influence costs of development and construction of housing. The permitting processes require time (raising finance costs), fees, and the personal time investment of parties involved. Building plan reviews increase cost and time. Local plans checking of non-commercial development by county officials could save time and money. A budget that allows adequate staff is necessary to minimize processing time. Also, to the extent possible, regulatory predictability and certainty in the processes required of the private sector will contribute to its willingness to contribute to housing affordability.

Goal 3A: Minimize the time required for processing housing-related development and construction permits in the interest of overall predictability and cost reduction.

Policy 3A-1: Streamline and simplify existing and proposed permitting processes. Review County land use, development, and building

¹ HUD FY 2023 Income Limits Documentation System

codes to simplify, modernize, and improve efficiencies. Coordinate with the cities on city adjacent UGAs to ensure consistency.

Policy 3A-2: Educate interested parties in the permitting processes required for land use actions using easy to understand publications such as brochures, handouts, workshops and websites readily available to the public.

Policy 3A-3: Consistently apply all applicable local, state, and federal laws. Clearly communicate rationale for rejected permits and/or provide guidance and request information that will ease applicants’ ability to remedy application-the International Building Codes.

Policy 3A-4: Provide clear and accessible permitting guidance and pre-application assistance to homeowners, small builders, and housing providers to reduce uncertainty and support housing development across a range of income levels.

Policy 3A-5: Where provisions of the Comprehensive Plan are subject to more than one reasonable interpretation, apply the interpretation that most effectively advances the County’s adopted housing supply and affordability objectives, provided that such interpretation:

- Remains consistent with the Growth Management Act.
- Does not diminish required protections for critical areas or designated resource lands.
- Maintains internal consistency among Comprehensive Plan elements.

Policy 3A-6: Periodically review development regulations and administrative practices to identify and eliminate unnecessary ambiguity that may unintentionally constrain housing supply or increase housing costs.

Mixed Land Uses with Appropriate Buffering and Siting Criteria

Where feasible, compatible mixed land uses should be encouraged in an effort to balance the need for both residential and commercial growth and development. The concept of encouraging denser housing development near employment and siting employment near the work force is well-accepted and logical. Housing, transportation, and employment-base needs are well-served by this proximity; it is desirable from public, employer, employee, and public service perspectives. Incompatible uses such as heavy, noisy, or noxious industrial facilities adjacent to residential uses should continue to be discouraged or fully mitigated. Some non-polluting, low-impact types of light industrial uses such as computer or medical equipment assembly, which could be large-scale but not environmentally or aesthetically offensive, could, with some buffering, be perfectly acceptable and probably desirable near residential development. Design standards and funding

sources will be needed to fully explore the potential for mixed use since, in some instances, lenders are reluctant participants in mixed-use projects.

County-Wide Planning Policies, ~~Visioning Community Value Statements~~, preservation of **industrial and** agricultural lands and environmentally sensitive areas, the comprehensive plan, and zoning regulations generally prescribe preferred locations for housing a growing population of county residents. Various levels of affordability and types of housing are needed and must be **somehow** blended into locational constraints.

Subsidized housing, housing for people experiencing homelessness~~housing~~, transient, emergency, and special needs housing are all part of the affordability challenge~~riddle~~, and in some instances a major part. Residents currently possessing safe and decent housing may not fully understand the scope of the housing problem and they may tend not to want housing for less advantaged households near them. In that regard, the location of affordable housing can be as difficult an issue as funding. Many people who do not want rural sprawl also do not want in-fill near them.

Goal 3B: Support residential housing near employment opportunities and transit.

~~Policy 3B-1: Enable and support housing development opportunities integral with, and near, compatible industrial and commercial activities and transit. Expand availability and development of housing, especially mixed and middle housing options, near transit and employment opportunities to reduce travel needs and vehicle miles traveled.~~

Policy 3B-2: Establish commercial zoning regulations that accommodate residential uses at a density higher than surrounding residential or rural zoning provided adequate transportation access and services are available.

~~Policy 3B-3: Establish industrial zoning regulations that accommodate temporary residential uses at a density higher than surrounding residential or rural zoning provided adequate transportation access is available.~~

Policy 3B-~~3~~4: Residential development adjacent to major transportation routes may require buffering.

Policy 3B-4: Consider environmental justice risks associated with locating residential development adjacent to heavy impact industry and mitigate any social, economic, and environmental harms.

Policy 3B-5: Future zoning decisions should protect public health and community well-being by ensuring adequate separation between incompatible land uses. This includes avoiding or minimizing residential uses in close proximity to heavy industrial activities whenever possible and implementing appropriate buffering, siting, and design measures where such proximity cannot reasonably be avoided.

Commented [MA19]: These statements were from the 1990s.

Commented [MA20]: The consultant's proposed modifications to Policy 3B-1 are based on Business and Commerce Advisory Committee (BCAC) language concepts in the Committee's comments dated Sept. 9, 2024.

Commented [TS21]: BCAC Housing Committee comment

Commented [MA22]: The GMA, as amended by HB 1220, requires local comprehensive plans to identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing (RCW 36.70A.070(2)(e)). The *Whatcom County and City Comprehensive Plans Racially Disparate Impacts Analysis* (Leland Consulting Group, Nov. 14, 2025) identifies Policy 3B-3 as a policy that may be insufficient and indicates environmental justice issues may arise for housing located near industry (pp. 31-32). The *Racially Disparate Impacts Analysis* provides options including deleting Policy 3B-3.

Goal 3C: Plan for and accommodate housing affordable to all economic segments of the population. Create opportunity for a broad range of housing prices, sizes, densities and types, and encourage mixed affordability and self-build opportunities.

Commented [MA23]: Modify to more closely align with the Housing goal in the GMA, as amended by House Bill 1220 (RCW 36.70A.020(4)).

Policy 3C-1: Support lot clustering, varied lot sizes, small-scale multi-family dwellings, accessory housing, especially accessory dwelling units (ADUs) in single-family zoning, and reductions in infrastructure requirements for subdivisions as incentives for development of housing obtainable by purchasers with the greatest possible mix of needs and household incomes.

Policy 3C-2: Support programs in which residents participate in the construction of their own home.

Policy 3C-3: Support development of manufactured and mobile home parks and establish design criteria that will enable them to fit into the surrounding community.

Policy 3C-4: Develop zoning criteria in order to appropriately site group homes, co-living housing, and accessory dwelling units within county residential urban growth areas.

Policy 3C-5: Review any changes to regulations affecting the provision of housing for current housing preferences and needs.

Policy 3C-6: In UGAs, consider easing lot consolidation criteria, increasing density, and decreasing minimum lot sizes, in the interest of serving housing affordability.

Policy 3C-7: Coordinate with the cities to ensure efficient, dense, and affordable mixed-use development in UGAs including, for example, appropriate public utility extension and annexation policies, and consideration of cost allocation to provide urban capital facilities.

Policy 3C-8: Encourage adequate urban land supply to provide for a broad range of residential densities and a variety of housing types commensurate with residential market demand and the need for housing that is affordable to all economic segments of the community including lower and moderate income households. Identify priority affordable housing areas and potential sites within unincorporated Whatcom County.

Commented [MA24]: The *Whatcom County and City Comprehensive Plans Racially Disparate Impacts Analysis* (Leland Consulting Group, Nov. 14, 2025) identifies Policy 3C-8 as a policy that may be insufficient and indicates the policy does not consider land available for lower income household (pp. 36).

Policy 3C-9: In UGAs, plan and provide zoning that allows for a full range of affordable housing types including multifamily apartments, condos, townhomes, fourplexes, triplexes, duplexes, detached single family homes, ADUs and tiny homes. In areas adjacent to UGAs with proximity to urban utilities, include sites into the UGA when accompanied by a property owner commitment to produce affordable housing and other GMA requirements are met.

Commented [MA25]: Review policy to support a variety of housing options in UGAs in accordance with RCW 36.70A.070(2)(b)).

Policy 3C-10: Support housing, including middle and high density multi-family housing, in proximity to commercial zones in UGAs.

Policy 3C-11: Explore and pursue opportunities to provide a clear and predictable pathway for code-compliant, sustainable, low-impact, off-grid housing in an effort to accommodate housing, alleviate conversion and development pressures at the rural-forestry interface, and permanently conserve adjacent working forest land necessary to support the local timber industry.

Commented [MA26]: The *Whatcom County and City Comprehensive Plans Racially Disparate Impacts Analysis* (Leland Consulting Group, Nov. 14, 2025) identifies Goal 3C as potentially insufficient and indicates adjusting the goal to support residential housing near commercial zones (p. 32). Staff is proposing to insert new Policy 3C-10 to address this concern.

Access to Housing

Changing demographics demand flexibility in siting, regulating, and designing future housing stocks. Family size, household size, proximity to employment and services, living space requirements due to cultural preferences, immigration patterns, and other factors contribute to changes in the type, number, and location of housing opportunities required for the future. The demographic makeup of Whatcom County's population can logically be expected to change over time through the 20-year Growth Management Act planning period.

While the upper ends of the housing scale are normally well-served by the developers of housing projects, other housing needs are frequently overlooked or neglected. Making housing affordable and accessible in all residential areas will help integrate **these groups a diversity** of people into the larger community. Farmworker housing is also important in the community.

Housing appropriate for those with temporary, transitional, emergency, and special needs is available only on an exceptional basis. Population growth will directly affect the number of people seeking such shelter.

~~Prior to adoption of the comprehensive plan, Whatcom County considered ordinance amendments allowing for easier and better provision of migrant worker housing. Difficult issues associated with the amendments such as water, sewer, and other health concerns caused them to be tabled while an accessory housing ordinance allowing development of detached second dwelling units was adopted. Nevertheless, those farm worker housing amendments must proceed to provide some relief for this important housing need.~~

Commented [MA27]: This language is outdated. Additionally, majority of farmworker housing is permitted by the State Department of Health with review of certain issues (such as setbacks, water, and sewage disposal) by the County.

Goal 3D: ~~Encourage Plan for and accommodate adequate housing types at every income level.~~

Commented [MA28R2]

Policy 3D-1: Participate with other local, state, ~~and~~ federal, ~~and tribal~~ agencies, non-profit organizations, ~~and~~ jurisdictions, ~~and the private sector~~ to ~~provide housing options plan for a regional distribution of housing for all income levels, including permanent supportive housing types and emergency housing and shelter for very low-income households ensuring economic integration to strengthen our communities.~~ **for all income levels by This includes** considering donating land, providing expertise, expediting permits, and other appropriate mechanisms.

Commented [MA29]: Modify to more closely align with the Housing goal in the GMA, as amended by House Bill 1220 (RCW 36.70A.020(4)).

Commented [MA30]: Language added from Countywide Planning Policy G.6, which was informed by recommendations of the Whatcom County Housing Advisory Committee (letter dated March 15, 2024).

Policy 3D-2: Enable the ability of the farmer to provide housing for all agricultural workers.

Policy 3D-3: Support programs which assist agricultural workers seeking affordable housing opportunities.

Policy 3D-4: Consider establishing a housing development fund, accessible to individuals qualified for affordable housing assistance who are legal residents of the county, administered by an agency and funded by contributions from developers wishing to utilize affordable housing incentives and bonuses, but not wishing to include affordable housing in the project receiving the incentives or bonuses.

Policy 3D-6: Advocate for condominium reform at the state level in order to provide long-term housing affordability and diversity.

Policy 3D-7: Review and modify development regulations to remove barriers to development of housing. For affordable housing sites, explore alternatives to remove development barriers including placing an affordable housing site within the UGA, establishing proper zoning, and working cooperatively with utility providers.

Policy 3D-8: The county will support efforts to secure additional affordable housing finance resources and programs that assist in addressing the housing goals and policies of this Chapter, including:

- Support the continuation of existing affordable housing financing programs in the county, including those enabled by state authorizing law;
- Work to secure new local resources to leverage federal and state programs that support the development and preservation of affordable housing and increase the capacity of the county to meet the identified housing needs in the county; and
- Periodically update documented programs and actions needed to achieve housing availability including gaps in local funding, particularly for housing that addresses the needs of households within the < 30% Area Median Income (AMI), 30-50% AMI, 51-80% AMI income bands.

Goal 3E: Provide for future housing needs, affordable to all segments of the community, and by responding to changing household demographics.

Policy 3E-1: Review and revise existing regulations to identify and reduce barriers to development ~~inhibitions to housing~~ for the varying preferences of those needing housing needs. Focus on ~~population segments with~~ particular needs such as housing for lower and moderate income households, multi-family housing, middle

Commented [MA31]: The consultant's proposed new Policy 3D-6 is based on Business and Commerce Advisory Committee (BCAC) recommendation to "Advocate for condominium reform" in the Committee's comments dated Sept. 9, 2024 (with the remainder of the sentence was added by the consultant).

Commented [MA32]: The GMA states local governments are to identify actions needed to achieve housing availability including addressing "barriers such as development regulations" (RCW 36.70A.070(2)(d)(ii)).

Commented [MA33]: Changes align with the Housing goal of the GMA (RCW 36.70A.020(4)).

Commented [MA34]: Some of the language concepts are from the recommendations of the Whatcom County Housing Advisory Committee (letter dated March 15, 2024). Modification passed by the Planning Commission on 12/18/2025.

housing, permanent supportive housing, and temporary, transitional, or emergency housing.

Policy 3E-2: Evaluate all new regulations or codes developed at the county level to ensure they accommodate housing ~~preferences and~~ needs existing at that time.

Policy 3E-3: Encourage financial institutions to participate in creative housing solutions which respond to changing demographics and needs.

Policy 3E-4: Support the development of housing specifically for young adults, seniors, groups, and single parents.

Policy 3E-5: Use Economic Development Investment (EDI) funds for long term, low interest loans to pay for onsite infrastructure for affordable housing. Encourage the use of utility local improvement districts (ULID) assessments to repay the EDI fund to maintain it as a revolving loan fund.

Commented [MA35]: Modification passed by the Planning Commission on 12/18/2025.

Commented [MA36]: From the Business and Commerce Advisory Committee (BCAC) recommendations dated Sept. 9, 2024 (with minor modifications).

Commented [MA37]: Modification passed by the Planning Commission on 12/18/2025.

Incentives for Affordability

Cost and Profit generally drive the production of most housing. Some types of housing, particularly some of the more affordable types, are less profitable to build. If the private sector is expected to play a part in the provision of affordable, obtainable housing, there must be incentives encouraging them to do so.

Goal 3F: Provide incentives to create affordable housing.

Policy 3F-1: Utilize Development Agreements as a mechanism to set project parameters and incentivize development that incorporates community benefits such as permanently affordable housing requirements, new and/or improved infrastructure, parks and open space, onsite mitigation, impact fees, and local workforce development opportunities.

Policy 3F-12: Include incentives in land use regulations, in UGAs and in Planned Unit Developments (PUDs), to offset the reduced profit inherent in more affordable types of housing. Incentives might include density bonuses, fee waivers, expedited permit review, and/or infrastructure concessions to protect developers wherever lower income or special needs populations are specifically served.

Policy 3F-23: Review accessory housing regulations for effectiveness and appropriateness and revise when necessary.

Policy 3F-34: Support innovative housing ideas including co-living housing (essentially a micro-community with some centralized facilities), elder cottages (housing units for healthy but aging **family household** members), accessory dwelling units (ADUs) in single family zoning of all jurisdictions, including cottage designs available at planning department front desk, and shared living residences or group quarters in UGAs, and educate the public about them.

Commented [MA38]: This is the term used in the GMA (RCW 36.70A.535).

- Policy 3F-45: Support existing agencies which provide for, or provide assistance in obtaining, low- or no-interest loans for those needing assistance to purchase homes.
- Policy 3F-56: Study ~~the new~~ innovative programs and policies in other urban areas within our region, particularly Seattle, Portland and Vancouver BC, relating to the use of ADUs and Detached Accessory Dwelling Units (DADUs).
- Policy 3F-67: Develop outreach materials that explain the advantages to the community of ADUs and DADUs such as the ability for residents to derive supplemental income, to age-in-place, provide accommodation for an aging parents and the reduction of the tax burden that results when the cost of providing public services is shared across a larger number of residents etc.
- Policy 3F-78: Work with the cities to develop ADU and DADU policies and programs that encourage infill within urban areas where transportation, public facilities, and utilities already exist.
- Policy 3F-89: Explore and consider various financial incentives and funds to support affordable housing.

~~Policy 3F-910: Encourage the integration of child care centers into multi-family housing developments.~~

~~Policy 3F-1011: Support the adoption and expansion of the Multifamily Tax Exemptions in Whatcom County cities.~~

~~Policy 3F-1112: Consider permitting and land use policies that increase affordable housing such as sustainable development incentives, expedited permitting and fee reductions, form-based building codes, transit-oriented development, infill development, density bonuses, clustering subdivisions, urban villages, and land trusts.~~

~~Policy 3F-1213: Encourage land acquisition for permanently affordable housing development such as a community land trust or land bank model.~~

~~Policy 3F-1314: Provide a waiver of Construction Impact Fees for long term guaranteed affordable housing for the <20% AMI income strata.~~

Regulatory Controls

Many forces act to inhibit the availability of affordable housing. Among these are regulatory controls, including zoning, subdivision regulations, development standards, and critical areas requirements. In addition, growth management itself implies some restrictions to affordable housing, by excluding land from development by focusing growth in urban areas, avoiding environmentally sensitive areas, and other ways. Mechanisms are needed to balance these inhibitions to affordability, such

Commented [MA39]: I language concept from the Child & Family Well-being Task Force recommendations dated March 12, 2024.

Commented [MA40]: I language concept from the Business and Commerce Advisory Committee (BCAC) recommendations dated Sept. 9, 2024. Some of language is also included in Climate Impact Advisory Committee comments dated December 12, 2024.

Commented [MA41]: I language concept from the Business and Commerce Advisory Committee (BCAC) recommendations dated Sept. 9, 2024.

Commented [MA42]: I odification passed by the Planning Commission on 12/18/2025.

as design variety promoted through covenants, conditions, and restrictions, relaxed infrastructure requirements, and zoning.

Goal 3G: Identify and remove barriers/impediments to affordable housing.

Policy 3G-1: Create opportunities to provide more affordability by relaxing or eliminating some infrastructure requirements or impact fees where it is clearly demonstrated that such action does not create a safety hazard and is not contrary to the interests of the health and well-being of county residents.

Policy 3G-2: Review and revise existing and proposed regulations for consistency with other housing goals.

Policy 3G-3: Educate the public on equal opportunity laws specifically related to housing and housing conditions including options available to anyone discriminated against. Promote equitable distribution of housing and anti-displacement protections.

Policy 3G-4: Allow development of smaller lots and creative housing options, especially in UGAs in areas with access to services, education, and jobs. Further explore opportunities for sustainable, low-impact, off-grid development in rural contexts that is footprint constrained, minimizes the need for new infrastructure, and can co-exist with active forest management operations.

Policy 3G-5: Develop policies that encourage the construction of more Attached and Detached Accessory Dwelling Units in urban areas.

Policy 3G-6: Update and streamline land use codes, housing regulations, and permitting processes that further encourage, and where appropriate, require more affordable, dense, sustainable, low impact, and energy efficient development.

Policy 3G-7: Pursue greater coordination between cities, the County, and for-profit and non-profit development community to provide feedback on housing needs.

Policy 3G-8: Adopt customer service standards that include required responses times and monitor outcomes.

Policy 3G-9: Tighten coordination and integration between Public Works, Health and Community Services, and Planning to streamline processes and avoid conflicts and confusion.

Policy 3G-10: Consider creating a program similar to A Regional Coalition for Housing (ARCH) to manage income qualified rentals and Multifamily Tax Exemptions. Coordinate education material for developers and renters regarding this program.

Policy 3G-11: Coordinate with cities and special purpose districts, as applicable, to support annexation of city UGAs.

Commented [MA43]: he *Whatcom County and City Comprehensive Plans Racially Disparate Impacts Analysis* (Leland Consulting Group, Nov. 14, 2025) identifies Policy 3G-4 as a policy that may be insufficient and indicates the policy does not specify where it would be implemented to accelerate housing development that meets the County’s housing needs (pp. 47).

Commented [MA44]: language from the Business and Commerce Advisory Committee (BCAC) recommendations dated Sept. 9, 2024.

Commented [MA45]: language concept from the Business and Commerce Advisory Committee (BCAC) recommendations dated Sept. 9, 2024.

Commented [MA46]: language from the Business and Commerce Advisory Committee (BCAC) recommendations dated Sept. 9, 2024.

Commented [MA47]: language concept from the Business and Commerce Advisory Committee (BCAC) recommendations dated Sept. 9, 2024.

Commented [MA48]: language concept from the Business and Commerce Advisory Committee (BCAC) recommendations dated Sept. 9, 2024.

Policy 3G-12: Support cultural and linguistic accessibility. Public engagement, housing resources, and permitting information should be available in multiple languages and communicated through culturally relevant outreach. Partner with local cultural organizations, faith groups, and community leaders to co-design outreach and education around affordable housing and tenant rights. Establish partnerships with nonprofits to expand renter education programs, translation services, and pathways to homeownership for immigrant households.

Preservation of Existing Housing Stock

Destruction of existing housing units due to redevelopment may be counterproductive for housing affordability. Instead, redevelopment should be taken as an opportunity to increase affordable housing.

Goal 3H: Facilitate **preservation, improvement, maintenance and rehabilitation of existing housing.**

Policy 3H-1: Wherever there is potential for destruction of existing structures, provide for preserving existing housing or creating new housing, whether by incorporation into the new project, moving, or recycling.

Policy 3H-2: Support creation of one or more additional housing units, within permitted density, when existing housing is remodeled, or commercial or light industrial facilities are redeveloped.

Policy 3H-3: Identify and implement incentives to preserve and sensitively rehabilitate historic properties.

Policy 3H-4: Encourage preservation and improvement of affordable housing, including existing mobile home parks.

Policy 3H-5: Support voluntary and incentivized energy reducing retrofits in existing homes.

Commented [MA49]: The GMA requires local comprehensive plans to address preservation and improvement of housing (RCW 36.70A.070(2)(b)).

Commented [MA50]: From Climate Impact Advisory Committee comments dated December 12, 2024.

Quantifiable Targets and Outcomes

The breadth of data identified in the U.S. Census, Land Capacity Analysis, Housing Needs Assessment, Buildable Lands Report and other sources provide a foundation for monitoring and quantifying the outcomes of policy. Use the Buildable Lands Report to review and evaluate whether Whatcom County has achieved its goals and policies and work to implement any identified reasonable measures necessary to reduce the differences between growth and development assumptions contained in the county and cities comprehensive plans with actual development patterns. By developing policies which are measurable, the County can further track results and identify needed actions.

Goal 3I: Develop aspirational measurable targets regarding housing and work to meet targets within the planning period.

Policy 3I-1: Target an average residential rental vacancy rate range of 4% to 7%.

Policy 3I-2: Target available housing for sale supply of 4-6 months, for all income levels.

Policy 3I-3: In accordance with RCW 36.70A.130(9), the County will produce an implementation progress report, consistent with measures developed by the State Department of Commerce, to address adopted changes to Chapter 3 – Housing and the effect those changes have had on housing affordability and availability within the unincorporated portions of the County.

Policy 3I-4: Consider prioritizing affordable housing projects in Whatcom County. The County should consider staffing levels to expedite project review for affordable housing projects.

Policy 3I-5: The County will continue to monitor housing stability indicators, housing production across income levels, geographic distribution of new housing, and cost burden trends to inform future updates and policy adjustments.

Commented [MA51]: I from the Business and Commerce Advisory Committee (BCAC) recommendations dated Sept. 9, 2024.

Commented [MA52]: I from the Business and Commerce Advisory Committee (BCAC) recommendations dated Sept. 9, 2024

Commented [MA53]: I modification passed by the Planning Commission on 12/18/2025.

Racially Disparate Impacts, Displacement, and Exclusion in Housing

Whatcom County recognizes that housing policy directly affects the social, cultural, and economic diversity of Whatcom County. When housing is unaffordable or inaccessible, the community loses essential diversity like young families, working-class residents, immigrants, and elders. Maintaining a diverse population is a core community value and a marker of economic and social health.

The GMA requires the County to identify local policies that result in racially disparate impacts, displacement, and exclusion in housing and identify areas that may be at higher risk of displacement. Such policies and areas are identified in *Whatcom County and City Comprehensive Plans Racially Disparate Impacts Analysis* (Leland Consulting Group, November 14, 2025). The GMA requires local comprehensive plans to identify policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions. Historical barriers to property ownership, such as discriminatory lending, racial covenants, and redlining, have had long lasting negative impacts on communities of color and low-income people that have spanned multiple generations and in many ways are still prevalent today.

Commented [MA54]: I see RCW 36.70A.070(2)(e), (f), (g) and (h).

The GMA also requires housing elements to establish anti-displacement policies with consideration given to the preservation of historical and cultural communities,

investments in low, very low, extremely low, and moderate-income housing, equitable development initiatives, inclusionary zoning, community planning requirements, tenant protections, land disposition policies, and consideration of land that may be used for affordable housing.

Goal 3J: Reverse racially disparate impacts, displacement, and exclusion in housing.

Commented [MA55]: Policy concepts below are from WAC 365-196-410(2)(f)(ii), with modifications.

Policy 3J-1: Increase affordable housing production. Consider generation of revenue for affordable housing and/or encouraging more affordable housing production through options such as affordable housing incentive programs, density bonuses, zoning reforms, tax incentives, and fee waiver programs.

Policy 3J-2: Preserve existing affordable housing. Consider programs or policies including mobile home park preservation or conversion to cooperative, supporting third-party purchases of existing affordable housing, community land trusts, notice of intent to sell ordinances, and regulating short-term rentals.

Policy 3J-3: Consider programs or policies including homeownership programs, such as those that support financial assistance to low-income homeowners or home repair and rehabilitation assistance; rental assistance; and tenant protections, such as right to return policies, rental inspection and registry programs, deferral of taxes, and tenant opportunity to purchase programs.

Policy 3J-4: Ensure benefits of investment and development are equitably distributed.

Policy 3J-5: Consider voluntary inclusionary zoning that provides incentives for a specified percentage of units in a new residential development to be affordable for households with low to moderate incomes.

Commented [MA56]: Modification passed by the Planning Commission on 12/18/2025.

Goal 3K: Whatcom County should establish measurable housing equity targets and work collaboratively with the Cities, Lummi Nation, Nooksack Indian Tribe, Whatcom Racial Equity Commission, and relevant stakeholders to achieve more equitable housing outcomes and inclusive neighborhoods.

Policy 3K-1: Reduce racial cost-burden gaps by supporting wealth building pathways such as co-ops, land trusts, and down payment assistance to increase homeownership among communities of color.

- Policy 3K-2: Adopt anti-displacement and tenant protections such as right-to-return, relocation assistance, preservation funds, rent increase restrictions, just-cause eviction protections, and continued elimination of racial covenants.
- Policy 3K-3: Acknowledge the historical and current disparities created by policies aimed at keeping “neighborhood character”. Remove all policies and goals aimed at keeping “neighborhood character” and other similar language to allow for a broader range of housing throughout Whatcom County.
- Policy 3K-4: Integrate housing with access to food, transit, parks, and essential community services.
- Policy 3K-5: Establish structures and frameworks to improve shared decision-making with community-based organizations and impacted residents.
- Policy 3K-6: Create an accessible process for removal of all racial covenants on homes and lands in Whatcom County.
- Policy 3K-7: Conduct equity and environmental justice impact analysis and mitigate harms in development projects.
- Policy 3K-8: Require periodic fair housing audits and set up a local reporting mechanism for housing discrimination, coordinated with the Washington State Human Rights Commission.
- Policy 3K-9: Coordinate respectfully and early with Tribal governments on housing-related planning topics, consistent with Whatcom County government-to-Tribal government practices and shared regional interests.
- Policy 3K-10: Consider opportunities for tribal land back.