

Whatcom County

# 2025 Comprehensive Plan Land Capacity Analysis Methodologies

County Council Meeting | September 9, 2025



WHATCOM COUNTY

*Washington*



## Agenda

- **Overview / review of requirements**
- **Land Capacity for Permanent Housing and Employment**
  - Methodology Overview
  - Stakeholder Comments
- **Land Capacity for Emergency Housing**
  - Methodology Overview
  - Stakeholder Comments
- **Discussion**

# Review of Requirements



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 HAPT tool generates **total Countywide need** by income band based on population projections.



Housing targets by income band are then **allocated** to UGAs and Rural & Resource Lands based on shares of countywide growth. Employment targets were also developed by the County and Leland Consulting Group.



Jurisdictions must show **land capacity** to accommodate the units and employment targets through zoning.



# Land Capacity by Income Band

- 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 deeply subsidized housing in areas zoned for medium to large scale multifamily development.
  - **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.**



## Land Capacity for Permanent Housing - Methodology

- Initially developed for Buildable Lands process, updated for Comprehensive Planning process
- Targets developed using modified Housing for All Planning Tool and adopted by Resolution 2025-011
- Parcel data provided by County, with supplemental zoning and updates provided by cities.
- **Process:**
  - Select Assumed Densities
  - Assemble Net Developable Land Inventory
  - Estimate Housing and Employment Capacity
  - Evaluate Land Capacity



## Land Capacity for Permanent Housing - Process

- **Select Assumed Densities**
  - Comprehensive plan designations and planned densities, zoning, and achieved densities are factors that local governments consider when selecting assumed future densities.
- **Assemble Net Developable Land Inventory**
  - Classification: Vacant, Partially-Used, Underutilized (County)
  - Deduct Critical Areas, Public Uses, Infrastructure Gaps, Market Factor
- **Estimate Housing and Employment Capacity**
  - Multiply net available acreage by density assumptions
  - Assign zones to income bands based on housing typologies
- **Evaluate Land Capacity**
  - If there is a deficit, analyze how to address through land use changes (i.e. densification) or potential expansion.

## Land Capacity for Permanent Housing - Comments

- Comments received from Futurewise, Whatcom Association of Realtors, Building Industry Association of Whatcom County, Jones Engineers, Carmichael Clark, P.S., ReSources, and Port of Bellingham.
- Concerns voiced over density assumptions, infrastructure gaps, market factor reductions, coordination between jurisdictions, feasibility of various housing types and income levels, and critical areas.
- Updates to methodology were made as well as a detailed comment response letter.
- Stakeholders attended a virtual meeting to review Land Capacity Analysis (LCA) sheets in June 2025.
- The Whatcom County Planning Commission held a public hearing on the Methodologies in July 2025.

## Land Capacity for Emergency Housing - Methodology

- Guidance developed by Commerce to ensure sufficient capacity for Emergency Housing based on new legislative requirements.
- Process:
  - Identify zone acreage where Emergency Housing and Shelter are allowed based on LCA sheets.
    - Take into account any spacing or intensity requirements
  - Develop assumptions for what type of Emergency Housing or Shelter is likely to be built in these zones
    - Emergency Housing sheets contain suggested densities based on Commerce guidance and Whatcom Health Department data
  - Calculate capacity and compare with target.



## Land Capacity for Emergency Housing - Comments

- Comments received from Futurewise, Carmichael Clark, P.S., and ReSources.
- Concerns voiced over double counting of land for permanent and emergency housing needs, definitions of emergency housing, permanent supportive housing, and duration of emergency housing during the planning period
- Updates to methodology were made as well as a detailed comment response letter.
- Stakeholders attended a virtual meeting to review LCA sheets.

# Project Contacts

Matt Aamot  
Senior Planner  
Whatcom County  
[2025Update@co.whatcom.wa.us](mailto:2025Update@co.whatcom.wa.us)

## Project Website



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

Andrew Oliver (Consultant)  
Senior Analyst  
Leland Consulting Group  
[aoliver@lelandconsulting.com](mailto:aoliver@lelandconsulting.com)