

Appendix I
Housing Needs Analysis



Whatcom County

Housing Needs Analysis

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Introduction

This Housing Needs Assessment (HNA) was prepared as part of the background analysis for updating the Housing Chapter of the Whatcom County Comprehensive Plan. As required by RCW 36.70A.070(2), jurisdictions planning under the Growth Management Act (GMA) must include a Housing Element in their comprehensive plan, which identifies current and future housing needs to serve all economic segments of the community and analyzes potential gaps in housing supply, type, and affordability.

This report includes a description of population and household characteristics, a profile of the local workforce, employment projections, an inventory of the housing supply, an overview of local housing market conditions, and gap and land capacity analyses.

This HNA fulfills the requirements of the GMA Housing Element checklist produced by the Washington Department of Commerce. Further information on this checklist can be found in Appendix A.

Key Takeaways

- **Whatcom County's population has been growing at a faster rate than the Puget Sound region** (1.3 percent vs. 1.1 percent average annual growth since 2020). Just under 41 percent of county residents live in Bellingham, while 40 percent live in unincorporated areas. Since 1991, the year with the highest net migration into the county was 2021-2022.
- **The population of Whatcom County is slightly older than the statewide population and there is a higher share of residents identifying as white alone** (not Hispanic or Latino). However, Everson's population is 30 percent Hispanic or Latino – triple the countywide share.
- In Whatcom County, 13 percent of residents are below the federal poverty level compared to 10 percent statewide. Peaceful Valley has the highest share of residents below the poverty level at 27.5 percent while Lynden has the lowest at 7.1 percent. **The high share of residents living below the federal poverty line indicates a need for affordable housing countywide.**
- **Roughly 11,700 Whatcom County residents have an ambulatory disability, indicating a potential need for more accessible units.** Birch Bay has the highest share of residents with a disability (18 percent) while Kendall has the lowest (six percent). Peaceful Valley has the highest share of residents with an ambulatory disability (12 percent).
- In Whatcom County, 63 percent of housing units are owner-occupied compared to 61 percent in the Puget Sound and 64 percent statewide. Nooksack has the highest share of owner-occupied households of Whatcom County cities (87 percent) while Bellingham has the lowest (46 percent). **As home prices rise, there may be a need for more rental housing, especially in population centers like Bellingham and Ferndale.**
- **The typical household in Whatcom County has 2.48 residents, below the statewide average of 2.58.** This is largely driven by the small household sizes in Bellingham (2.28 people per household), where students make up a significant share of the population. Kendall has the largest households, with an average of 3.35 residents. Over two thirds of housing units countywide have two to three bedrooms. **While the county has a low rate of overcrowding (1.3**

percent), 3.8 percent of Ferndale households and 4.5 percent of Peaceful Valley households have more than 1.5 people per bedroom.

- In Whatcom County, 47 percent of households make more than the area median income (AMI) while 12 percent make less than 30 percent of AMI. **Kendall and Peaceful Valley have the lowest share of residents making more than the median (19 and 26 percent, respectively) and the highest share of residents making less than 30 percent of AMI (35 and 30 percent, respectively).** Despite this, half of households in Kendall and two thirds of households in Peaceful Valley own their homes. In Kendall, 49 percent of households are cost burdened, with 41 percent spending more than half of their incomes on housing. **This indicates a potential need for programs aimed at supporting low-income and cost-burdened homeowners as well as renters.**
- According to the Department of Commerce, households south of Everson and in the area that includes Kendall and Peaceful Valley are at a higher risk of displacement than other unincorporated areas. In addition, Ferndale and Bellingham have areas with high displacement risks, while the west side of Lynden is already experiencing demographic and market change. **The County and local jurisdictions should consider enacting policies to help residents of these areas remain housed in their communities.**
- **Whatcom County is expected to add 36,013 housing units and 67,638 residents between 2023 and 2045.** Over half of the new housing units are expected to be in Bellingham (including both the city and UGA) while nearly 13 percent are expected to be located in Ferndale.
- **Bellingham is the major job center in Whatcom County and is home to over half of the jobs countywide as of 2023.** Healthcare and social assistance is the largest job sector countywide and healthcare practitioners have the highest mean hourly wage among top-sector occupations (\$54.09). However, healthcare support occupations typically pay less than the metro area mean at \$19.55 per hour.
- **As the County's major job center, Bellingham has a jobs to housing ratio of 1.2, the highest countywide.** Ferndale and Lynden also have more jobs than housing units, while Nooksack has nearly twice as many homes as jobs. Countywide, the jobs to housing ratio is 0.85.
- **Countywide, the dominant housing type is single family (attached or detached) homes.** However, 20 percent of homes in Bellingham are in structures with at least 20 units, and nearly half of the housing units in Peaceful Valley and Kendall are mobile homes. Between 2003 and 2023, most of the housing permitted countywide was in single-family homes. However, 7,685 homes in structures with at least five units were permitted in Bellingham over that period.
- Home prices rose significantly between 2004 and 2024, with the typical home price in the county reaching \$600,447 in 2024. Sumas and Everson have the lowest typical home prices in the county while Bellingham has the highest. **As home price increases continue to outpace wages, the risks of cost burden and displacement are likely to grow.**

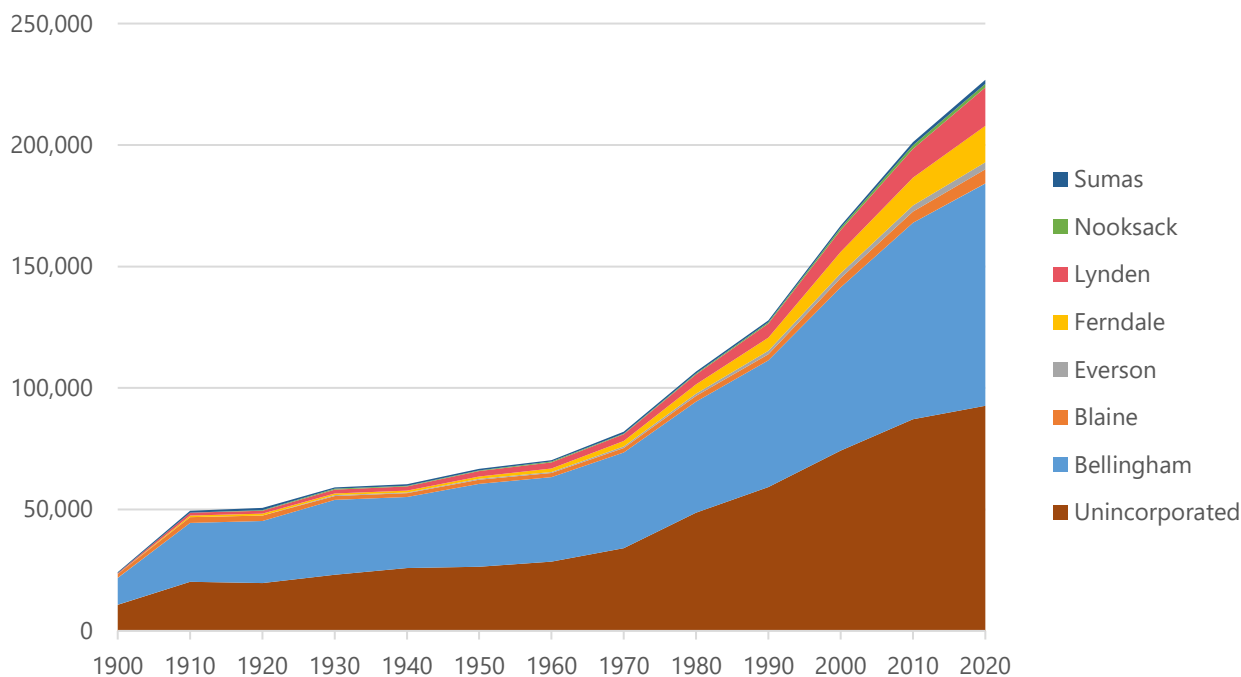
Community Profile

Population Characteristics

According to the Washington Office of Financial Management, as of 2023 there are an estimated 235,800 residents in Whatcom County. This represents an increase of nearly 9,000 residents since the 2020 Census (nearly four percent growth over three years, or 1.3 percent average annual growth). Over the same period, the Puget Sound region’s population grew by just over three percent (1.1 percent average annual growth).

Historically, most of the population growth in Whatcom County has been concentrated in Bellingham and unincorporated areas (which include urban growth areas outside city limits and rural lands). As of 2023, just 19 percent of the population lived in the other cities in the County, including Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas.

Figure 1. Historic Population Growth in Whatcom County, 1900-2020



Source: US Census Bureau Decennial Census via Washington Office of Financial Management (OFM).

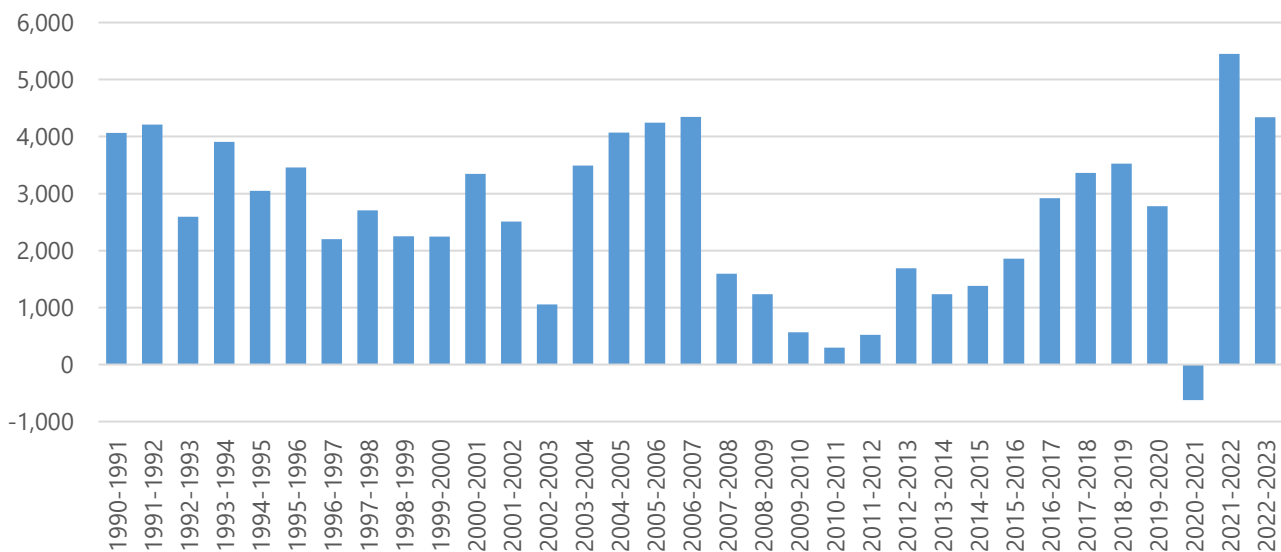
Figure 2. Whatcom County Population by City, 2010-2023

	2010	2020	2023
Bellingham	80,885	91,482	95,960
Blaine	4,684	5,884	6,310
Everson	2,483	2,888	3,135
Ferndale	11,415	15,048	16,330
Lynden	11,951	15,749	16,520
Nooksack	1,338	1,471	1,560
Sumas	1,319	1,665	1,810
Unincorporated	87,065	92,660	94,175
Total	201,140	226,847	235,800

Source: Washington Office of Financial Management (OFM).

Net migration into Whatcom County peaked in 2021-2022, when a net total of 5,488 new residents moved to the county. The 2020-2021 period during the peak of the COVID-19 pandemic was the only instance of negative net migration over the past thirty years. Net migration into the county also slowed during the Great Recession, from 2007 to 2012.

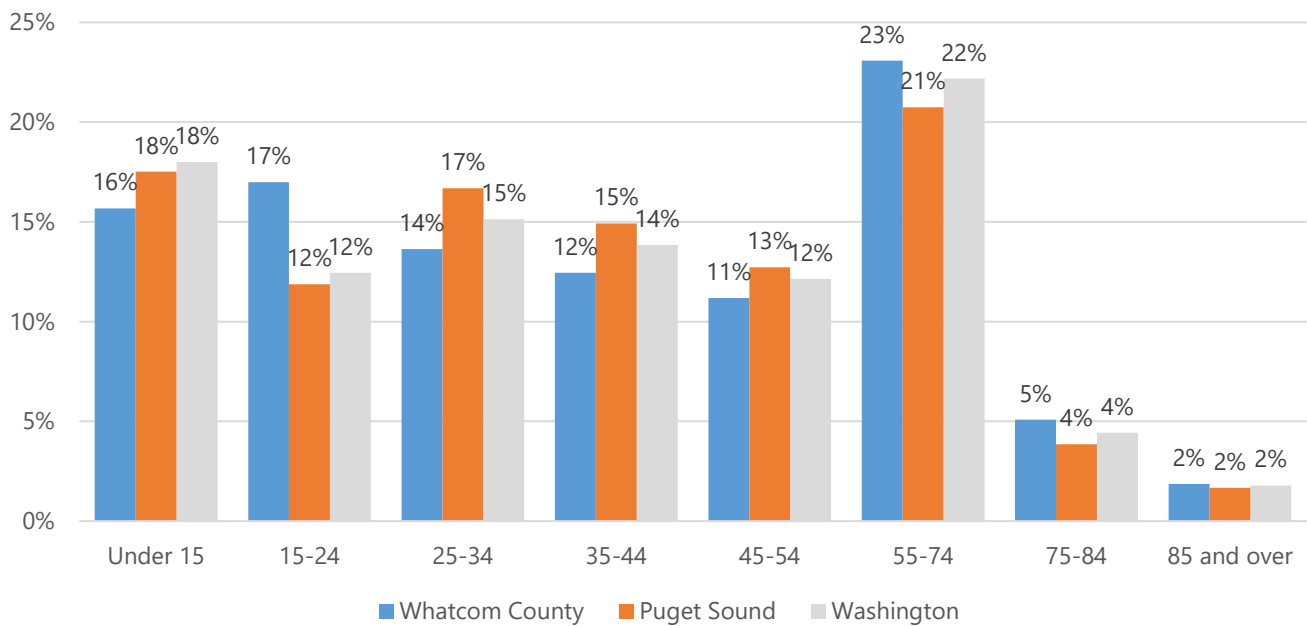
Figure 3. Net Migration in Whatcom County, 1990-2023



Source: Washington Office of Financial Management (OFM).

As shown in Figure 4 below, the population of Whatcom County is slightly older than the four-county Puget Sound region (Snohomish, Pierce, King, and Kitsap Counties). While 30 percent of Whatcom County residents are 55 years or older, 26 percent of Puget Sound residents are within that age range. Whatcom County also has a slightly higher share of residents under the age of 25 (33 percent).

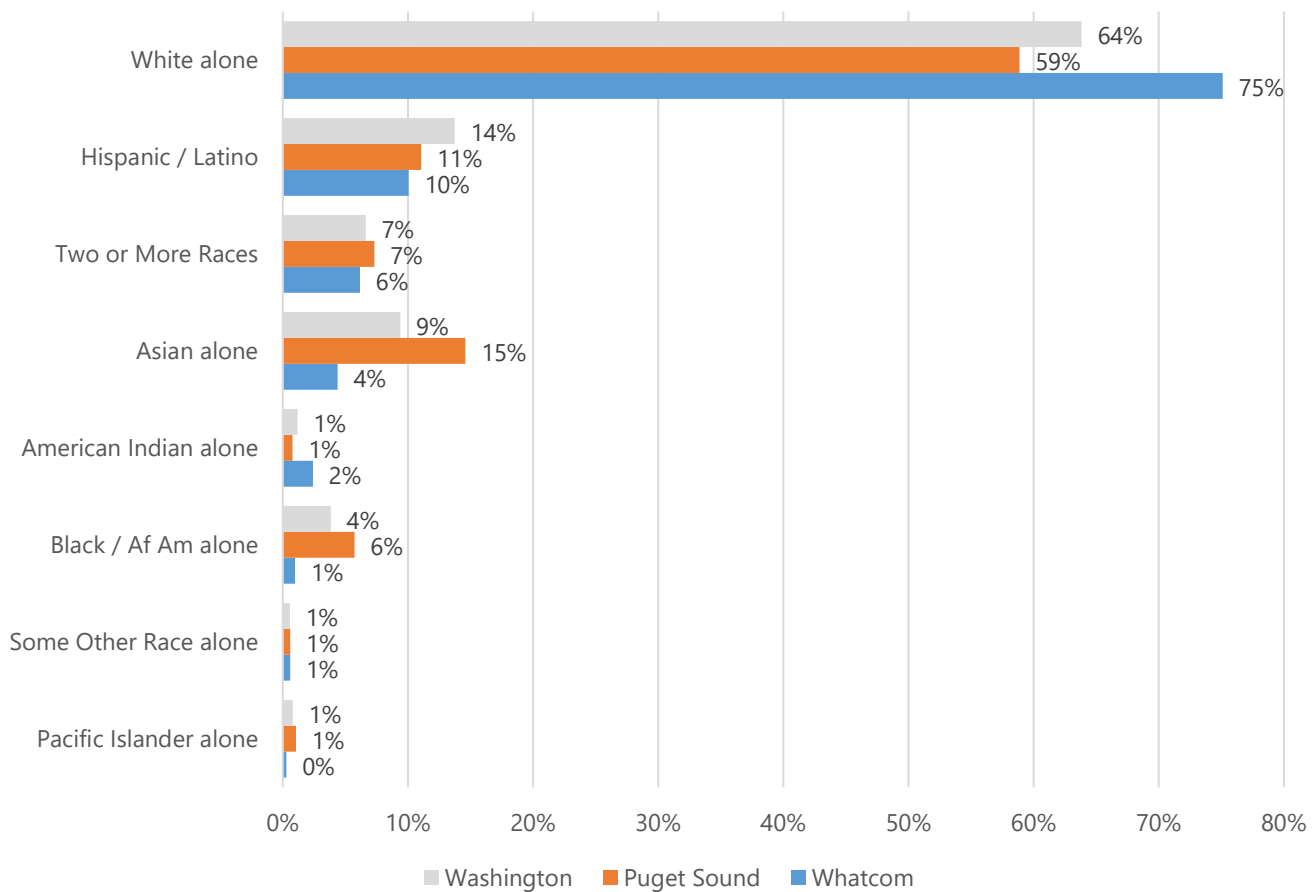
Figure 4. Age Distribution in Whatcom County and the Puget Sound Region, 2022



Source: US Census Bureau 2022 5-Year ACS, Table S0101.

Overall, Whatcom County is less diverse than the Puget Sound region, as Whatcom County has a higher share of white (non-Hispanic) residents than the Puget Sound area. Just four percent of Whatcom County residents are Asian, compared with 15 percent of Puget Sound residents. There are slightly over 2,200 Black or African American (non-Hispanic) residents in Whatcom County, making up just one percent of the population, compared with six percent in the Puget Sound region and four percent statewide.

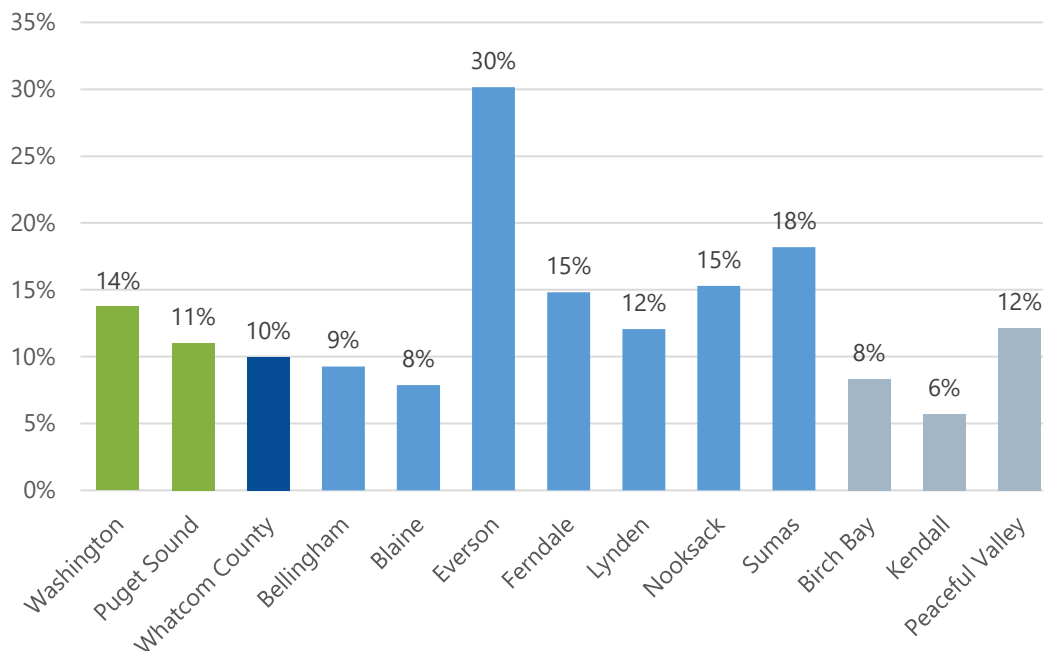
Figure 5. Race and Ethnicity in Whatcom County and the Puget Sound Region, 2020



Source: US Census Bureau 2020 Decennial Census, Table P9.

Ten percent of Whatcom County residents are Hispanic or Latino, compared with 14 percent statewide. The city with the highest share of Hispanic or Latino residents is Everson, where nearly one third of the population is Hispanic or Latino. Ferndale, Nooksack, and Sumas also have relatively high shares of Hispanic or Latino residents. While Bellingham is the largest city in the County with over 91,000 residents, just 8,500 Bellingham residents are Hispanic or Latino (nine percent).

Figure 6. Share of Residents of Any Race Who Are Hispanic or Latino, 2020



Source: US Census Bureau 2020 Decennial Census, Table P9.

Note: Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas refer to the areas within each city boundary. Birch Bay, Kendall, and Peaceful Valley are Census Designated Places (CDPs).

The most common language spoken at home other than English in Whatcom County is Spanish, followed by other Indo-European languages. Roughly 22 percent of Whatcom County residents speak a language other than English in their homes, compared with 24 percent across the Puget Sound region. Since 2010, the share of Whatcom County residents who speak a language other than English has grown slightly as the share of Spanish speakers has increased.

Figure 7. Languages Spoken at Home in Whatcom County, 2022

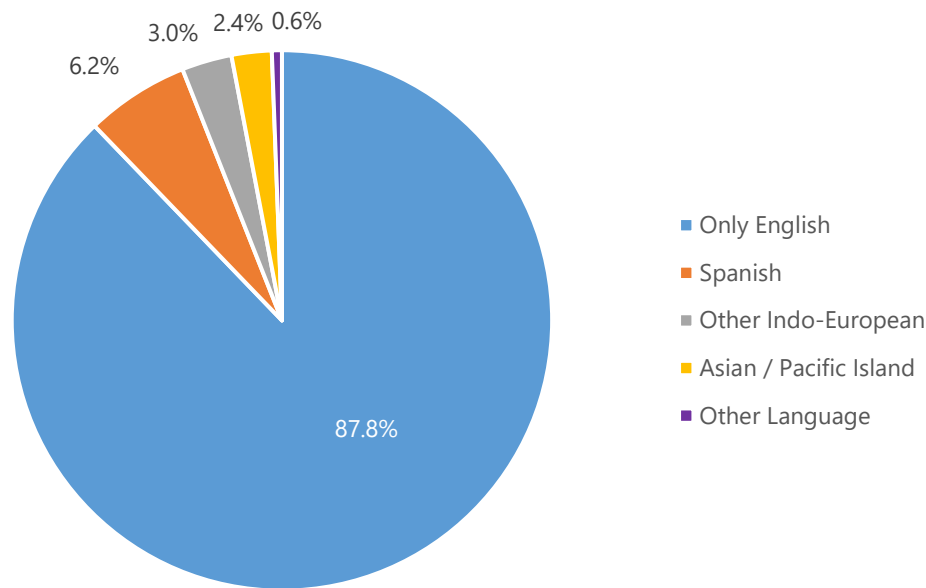


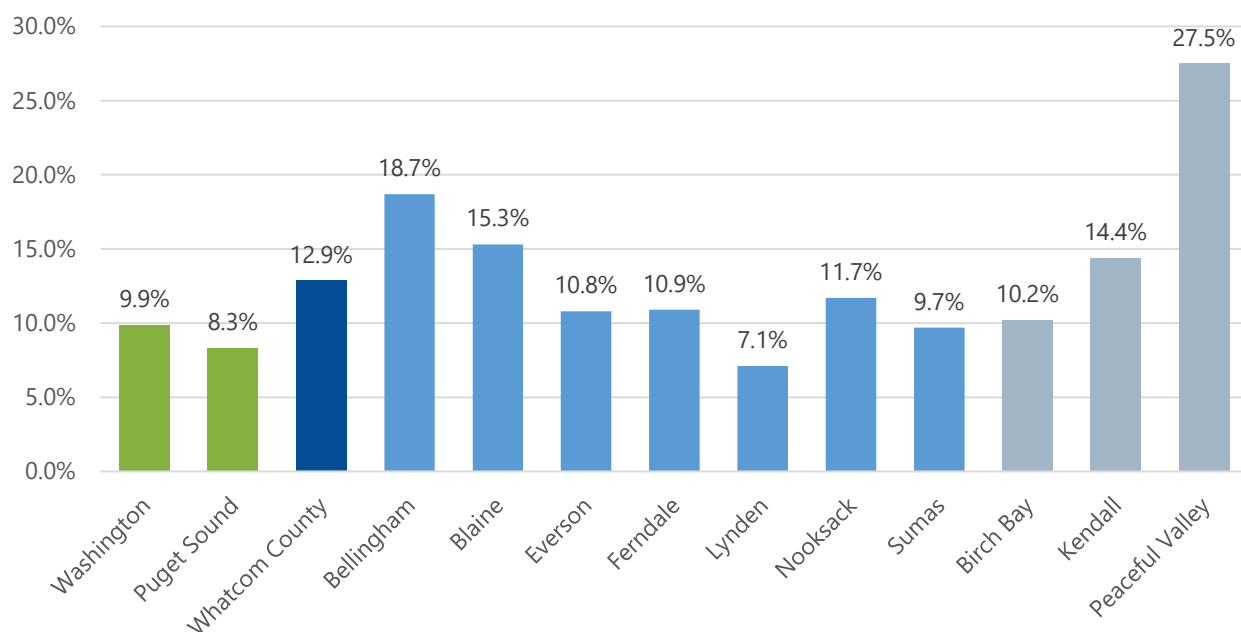
Figure 8. Languages Spoken at Home in Whatcom County, 2010-2022

	2010	2020	2022
Only English	88.6%	88.1%	87.8%
Spanish	4.9%	6.1%	6.2%
Other Indo-European	3.9%	3.0%	3.0%
Asian / Pacific Island	2.1%	2.4%	2.4%
Other Language	0.5%	0.4%	0.6%

Source: US Census Bureau 5-Year ACS, Table S1601.

Whatcom County has a higher share of residents living below the federal poverty level than Washington or the Puget Sound region. The Peaceful Valley CDP and city of Bellingham have the highest share of residents living in poverty, while Lynden has the lowest. However, nearly half (46 percent) of those living below the poverty level in Bellingham are between the ages of 18 and 24 years old, indicating that the poverty level in the city may be impacted by the high share of college students.

Figure 9. Percent of Residents Below the Federal Poverty Line, 2022



Source: US Census 2022 5-Year ACS, Table S1701.

Note: Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas refer to the areas within each city boundary. Birch Bay, Kendall, and Peaceful Valley are Census Designated Places (CDPs).

Among the Whatcom County civilian, non-institutionalized population, 13 percent (29,000 residents) have some type of disability. This is in line with state averages. Peaceful Valley and Birch Bay have the highest share of disabled residents, 22 and 18 percent, respectively. Roughly 11,700 Whatcom County residents have an ambulatory disability, indicating that there may be a need for more accessible housing, especially as the population ages.

Figure 10. Disability by Type among Total Civilian, Non-Institutionalized Population, 2022

	Washington	Puget Sound	Whatcom County	Bellingham	Blaine	Everson
Total Population	7,571,532	4,211,035	224,896	90,152	5,814	2,960
With a Disability	985,655	478,046	29,056	11,259	954	449
Hearing	292,556	132,358	8,709	2,893	274	131
Vision	167,270	79,013	4,707	1,625	229	77
Cognitive	402,321	199,620	13,410	5,519	472	221
Ambulatory	450,435	217,239	11,698	4,870	335	230
Self-Care	177,963	87,653	4,880	1,790	132	85
Independent Living	340,507	170,519	9,852	4,102	244	172

	Ferndale	Lynden	Nooksack	Sumas	Birch Bay	Kendall	Peaceful Valley
Total Population	15,075	15,580	1,564	1,397	11,048	959	2,715
With a Disability	1,820	1,923	195	199	1,986	55	600
Hearing	385	733	67	67	624	-	106
Vision	282	299	48	23	384	-	114
Cognitive	1,019	796	38	38	1,112	29	339
Ambulatory	509	730	66	140	787	44	328
Self-Care	174	469	29	43	278	-	126
Independent Living	787	679	58	60	752	11	107

	Washington	Puget Sound	Whatcom County	Bellingham	Blaine	Everson
With a Disability	13%	11%	13%	12%	16%	15%
Hearing	4%	3%	4%	3%	5%	4%
Vision	2%	2%	2%	2%	4%	3%
Cognitive	5%	5%	6%	6%	8%	7%
Ambulatory	6%	5%	5%	5%	6%	8%
Self-Care	2%	2%	2%	2%	2%	3%
Independent Living	4%	4%	4%	5%	4%	6%

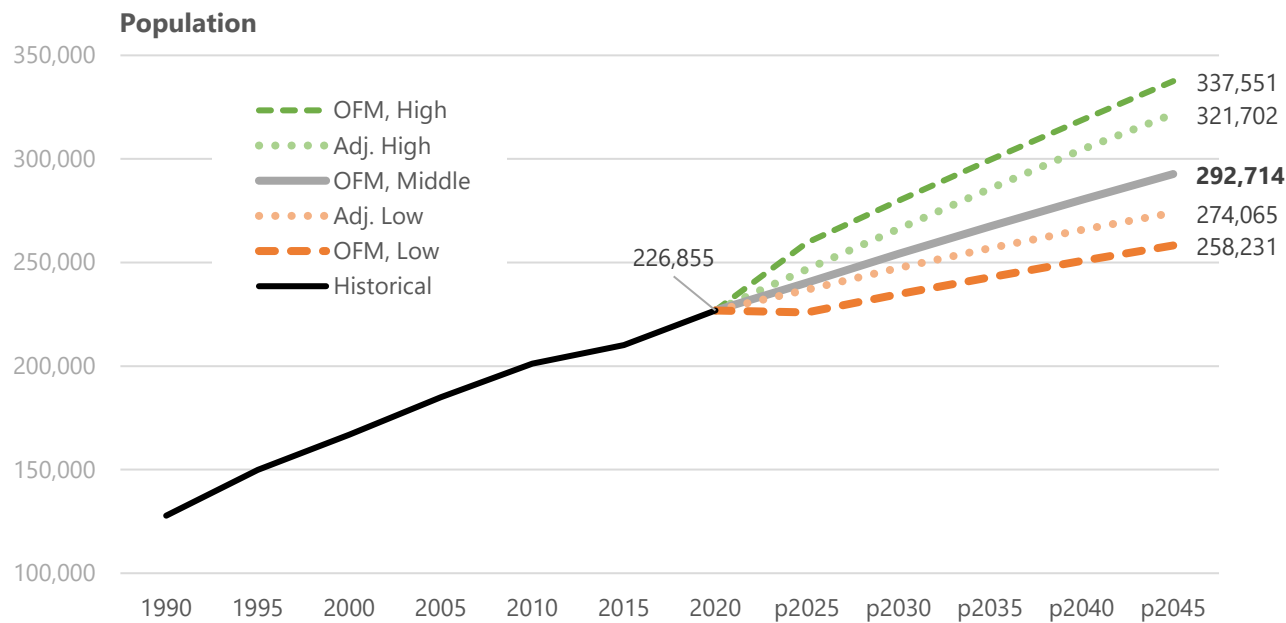
	Ferndale	Lynden	Nooksack	Sumas	Birch Bay	Kendall	Peaceful Valley
With a Disability	12%	12%	12%	14%	18%	6%	22%
Hearing	3%	5%	4%	5%	6%	0%	4%
Vision	2%	2%	3%	2%	3%	0%	4%
Cognitive	7%	5%	2%	3%	10%	3%	12%
Ambulatory	3%	5%	4%	10%	7%	5%	12%
Self-Care	1%	3%	2%	3%	3%	0%	5%
Independent Living	5%	4%	4%	4%	7%	1%	4%

Source: US Census 2022 5-Year ACS, Table S1810.

Note: Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas refer to the areas within each city boundary. Birch Bay, Kendall, and Peaceful Valley are Census Designated Places (CDPs).

As shown below in Figure 5, under OFM’s middle forecast, Whatcom County would increase in population by 2045 to 292,714. The chart below shows the County’s adjusted low and high population projections as well as the low and high population ranges forecast by OFM. Full details of the population forecasts can be found in the “Population and Employment: Growth Projections and Preliminary Allocations Technical Report” (May 22, 2024).

Figure 11: Revised Population Forecast Ranges, Whatcom County, 2020-2045



Source: OFM - Forecasting & Research, December 2022; and Leland Consulting Group

Figure 12 below shows the preliminary growth targets for population and housing units for the 2023-2045 period (Resolution 2025-011 approved by the Whatcom County Council on March 11, 2025, and subsequently modified by County Council in March 2026 for Rural and Resource Lands, Birch Bay UGA, and Columbia Valley UGA).

Figure 12: Population and Housing Growth Targets 2023-2045

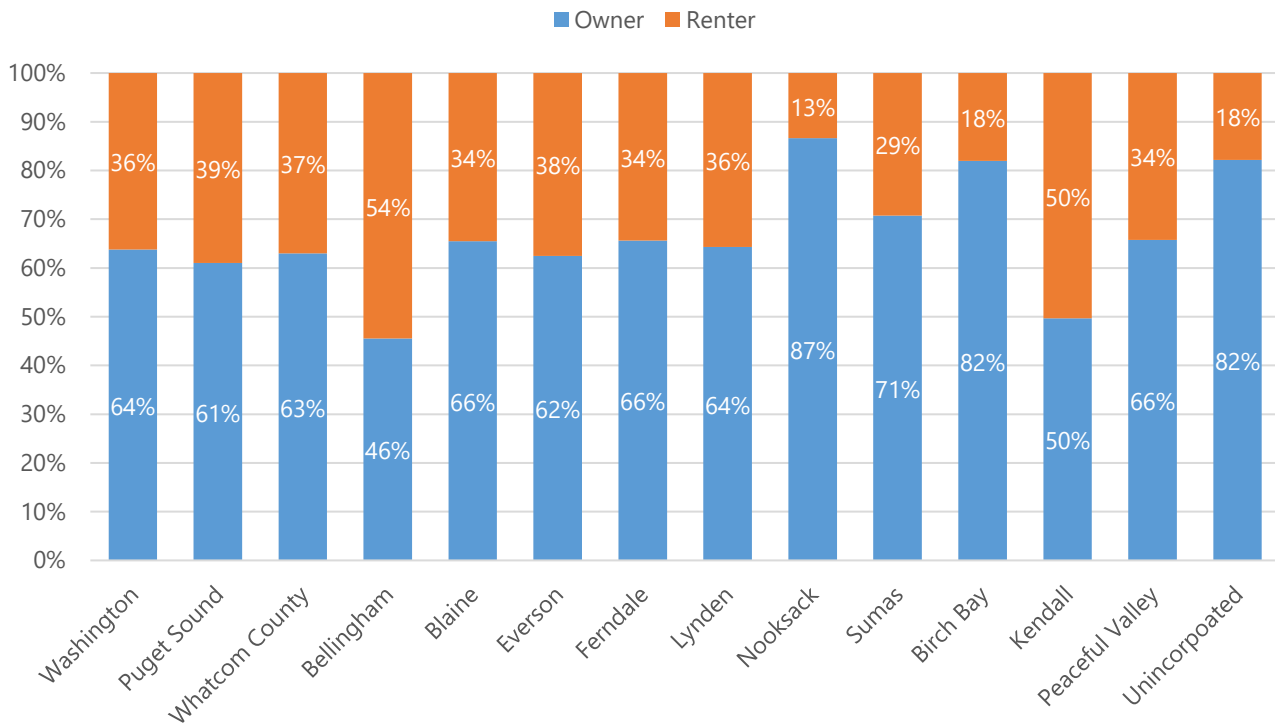
	Population	Population Share	Housing Units	Housing Unit Share
Bellingham City & UGA	30,310	46.0%	18,390	52.2%
Birch Bay UGA	2,662	4.0%	981	2.8%
Blaine City & UGA	3,500	5.3%	1,774	5.0%
Cherry Point UGA	0	0.0%	0	0.0%
Columbia Valley UGA	1,137	1.7%	433	1.2%
Everson City & UGA	1,408	2.1%	610	1.7%
Ferndale City & UGA	10,961	16.6%	4,659	13.2%
Lynden City & UGA	6,665	10.1%	3,535	10.0%
Nooksack City & UGA	995	1.5%	433	1.2%
Sumas City & UGA	1,000	1.5%	643	1.8%
Rural and Resource Lands	7,243	11.0%	3,771	10.7%
Total	65,881	100.0%	35,229	100.0%

Source: Whatcom County Non-Binding Multi-Jurisdictional Resolution No. 2025-011, Adopted March 11, 2025, subsequently modified by County Council in March 2026 for Rural and Resource Lands, Birch Bay UGA, and Columbia Valley UGA.

Household Characteristics

Whatcom County has 91,171 occupied housing units, according to the 2022 American Community Survey 5-year estimates. Of these, 63 percent are owner-occupied while 37 percent are renter-occupied. This is similar to statewide trends. Bellingham has the highest share of renter-occupied housing units (54 percent) while Nooksack has the lowest share (13 percent) countywide.

Figure 13. Share of Owner- and Renter-Occupied Housing Units, 2022

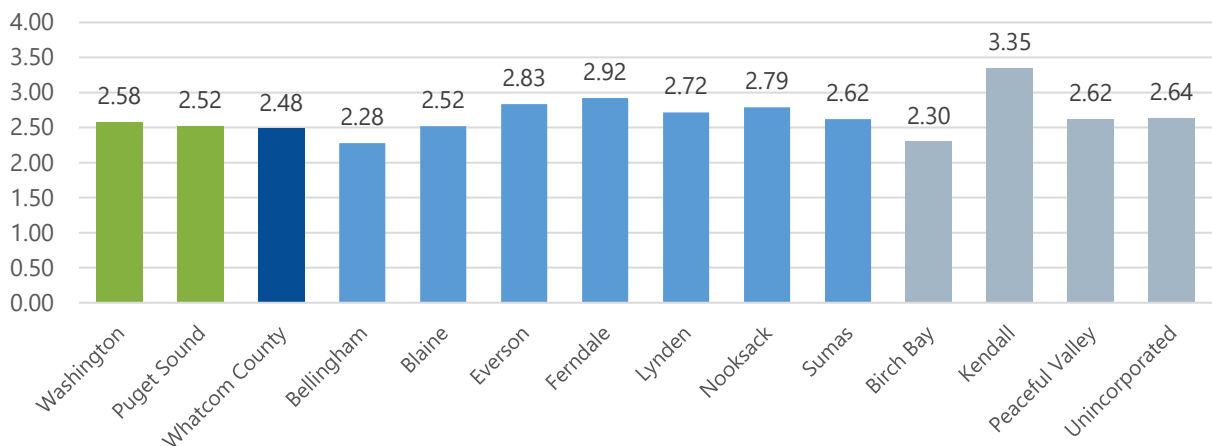


Source: US Census 2022 5-Year ACS, Table S2501.

Note: Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas refer to the areas within each city boundary. Birch Bay, Kendall, and Peaceful Valley are Census Designated Places (CDPs). Unincorporated includes the areas outside of city limits, excluding the Birch Bay, Kendall, and Peaceful Valley CDPs.

Whatcom County has an average of 2.48 people per household, below the statewide average of 2.58. This is largely driven by the relatively small average household size in Bellingham (2.28 people per household), which also correlates with the larger share of renters in Bellingham shown above. The Kendall CDP has the highest number of people per household in the county at 3.35.

Figure 14. Average People per Household in Whatcom County, 2022

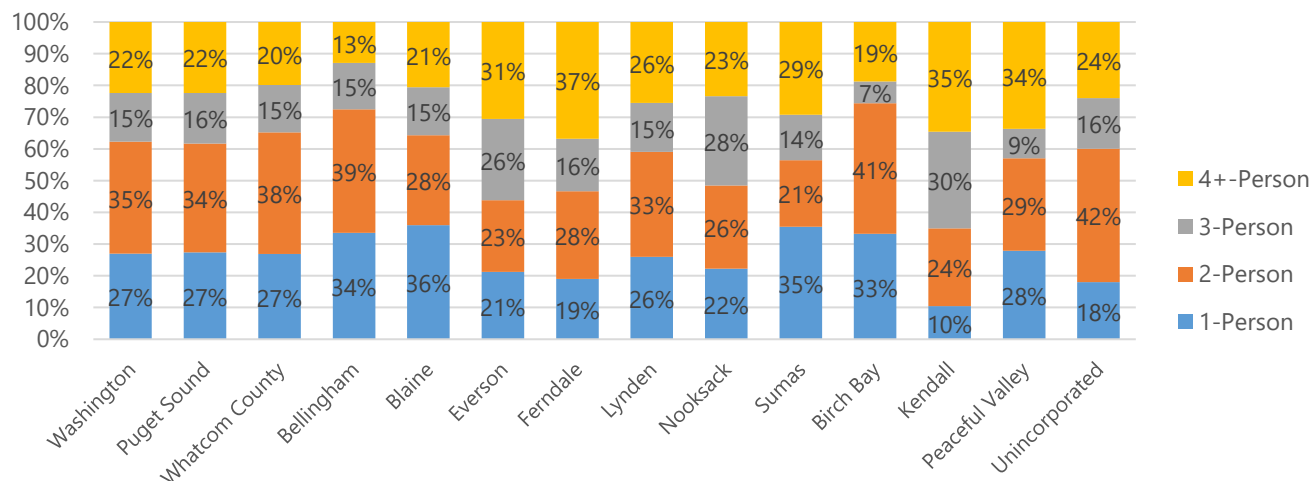


Source: US Census 2022 5-Year ACS, Tables S2501, DP05.

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In Whatcom County, Washington, and the Puget Sound region, 27 percent of households have just one person. Within Whatcom County, Blaine has the highest share of one-person households (36 percent) while the Kendal CDP has the lowest (ten percent). Nearly two thirds of Whatcom County households have one or two residents, indicating a high need for smaller housing units. Just one fifth of Whatcom County households have four or more residents.

Figure 15. Households by Number of Residents, 2022

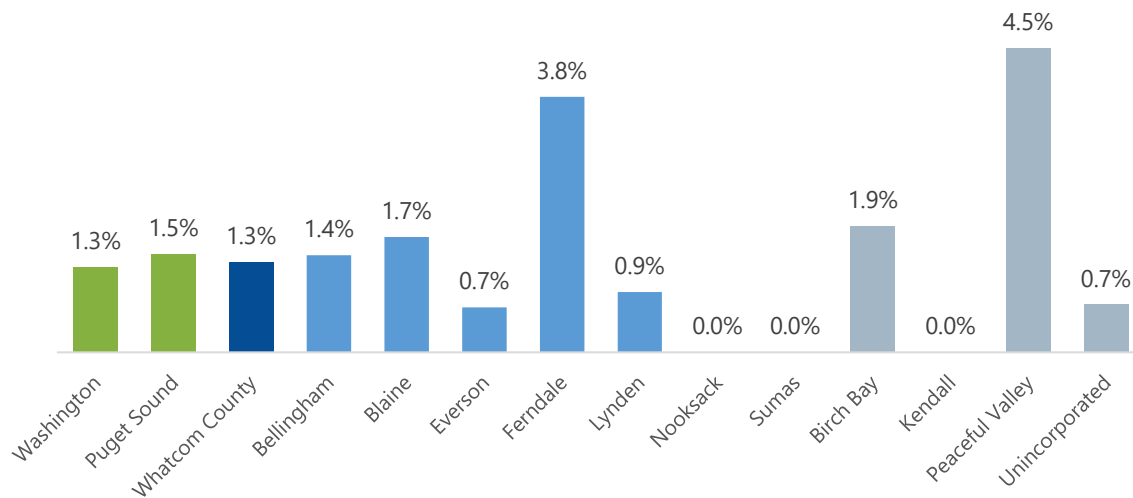


Source: US Census 2022 5-Year ACS, Tables S2501, DP05.

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The Puget Sound Regional Council defines overcrowded households as those where there are more than 1.5 people per bedroom. In Whatcom County, 1.3 percent of households are overcrowded. Peaceful Valley has the highest share of overcrowded households at 4.5 percent, while Nooksack, Sumas, and Kendall do not have any overcrowded households. According to the US Census Bureau, 579 households in Bellingham (1.4 percent) and 197 households in Ferndale (3.8 percent) have more than 1.5 people per bedroom. This suggests a need for more family-sized housing in these cities.

Figure 16. Rates of Overcrowding, Whatcom County, 2022

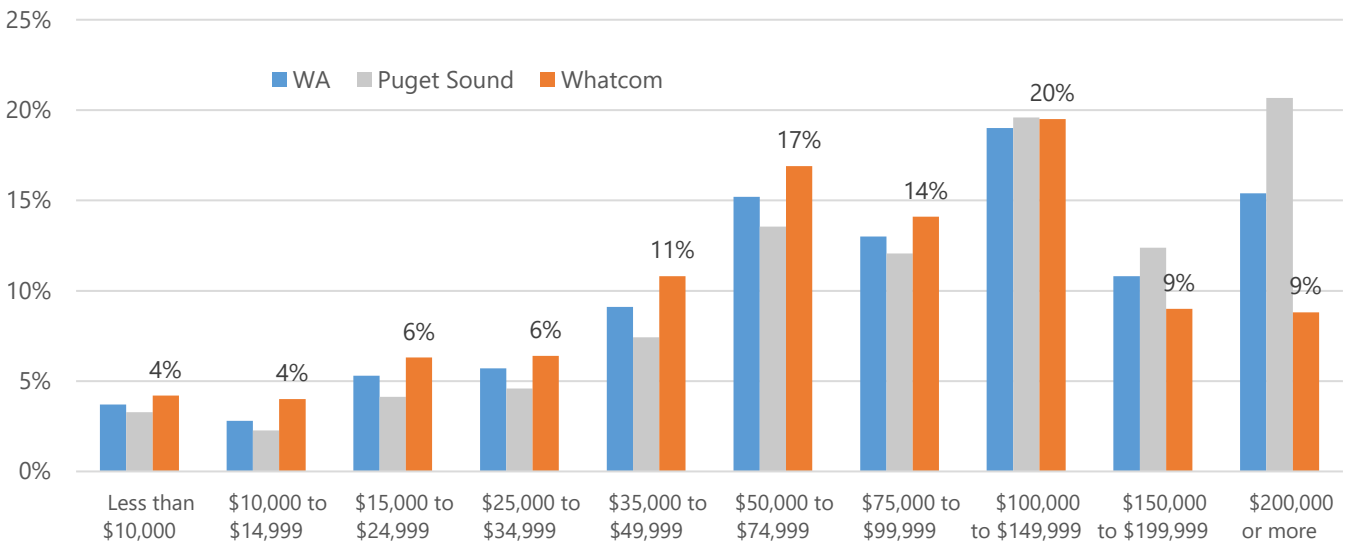


Source: US Census 2022 5-Year ACS, Tables S2501, DP05.

Note: Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas refer to the areas within each city boundary. Birch Bay, Kendall, and Peaceful Valley are Census Designated Places (CDPs). Unincorporated includes the areas outside of city limits, excluding the Birch Bay, Kendall, and Peaceful Valley CDPs.

The median household income in Whatcom County is \$77,581, compared with \$107,565 in the Puget Sound region and \$90,325 statewide. Nearly one third of households in Whatcom County make less than \$50,000 annually, compared with 27 percent statewide.

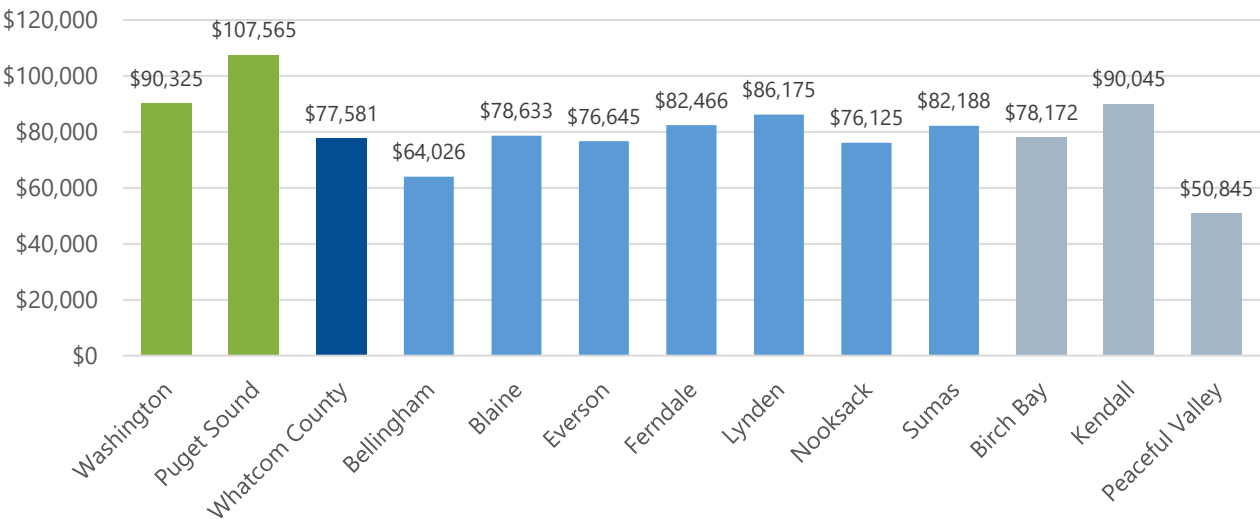
Figure 17. Household Income Distribution, Whatcom County, 2022



Source: US Census 2022 5-Year ACS, Table S1901.

Within Whatcom County, the Kendall CDP and Lynden have the highest median incomes. The Peaceful Valley CDP has the lowest median household income at \$50,845.

Figure 18. Median Household Income, Whatcom County, 2022



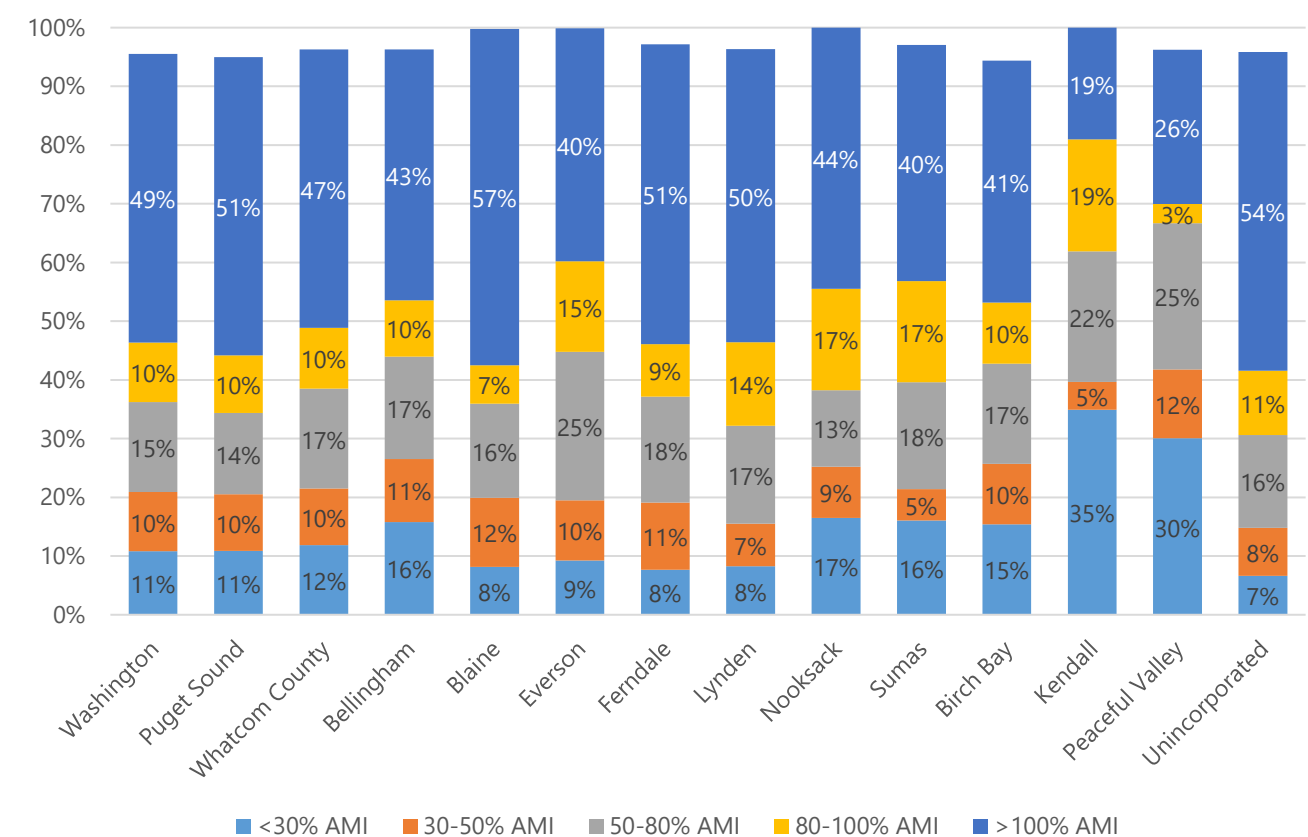
Source: US Census 2022 5-Year ACS, Table S1901.

Note: Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas refer to the areas within each city boundary. Birch Bay, Kendall, and Peaceful Valley are Census Designated Places (CDPs).

In Whatcom County, 47 percent of households make more than 100 percent of Area Median Income (AMI), compared with 49 percent statewide. More than half of households in unincorporated Whatcom

County make above the AMI while 45 percent make less than 80 percent AMI. Kendall has the highest share of households making below 30 percent AMI of any jurisdiction countywide (35 percent).

Figure 19. Households by Income Band, Whatcom County, 2021

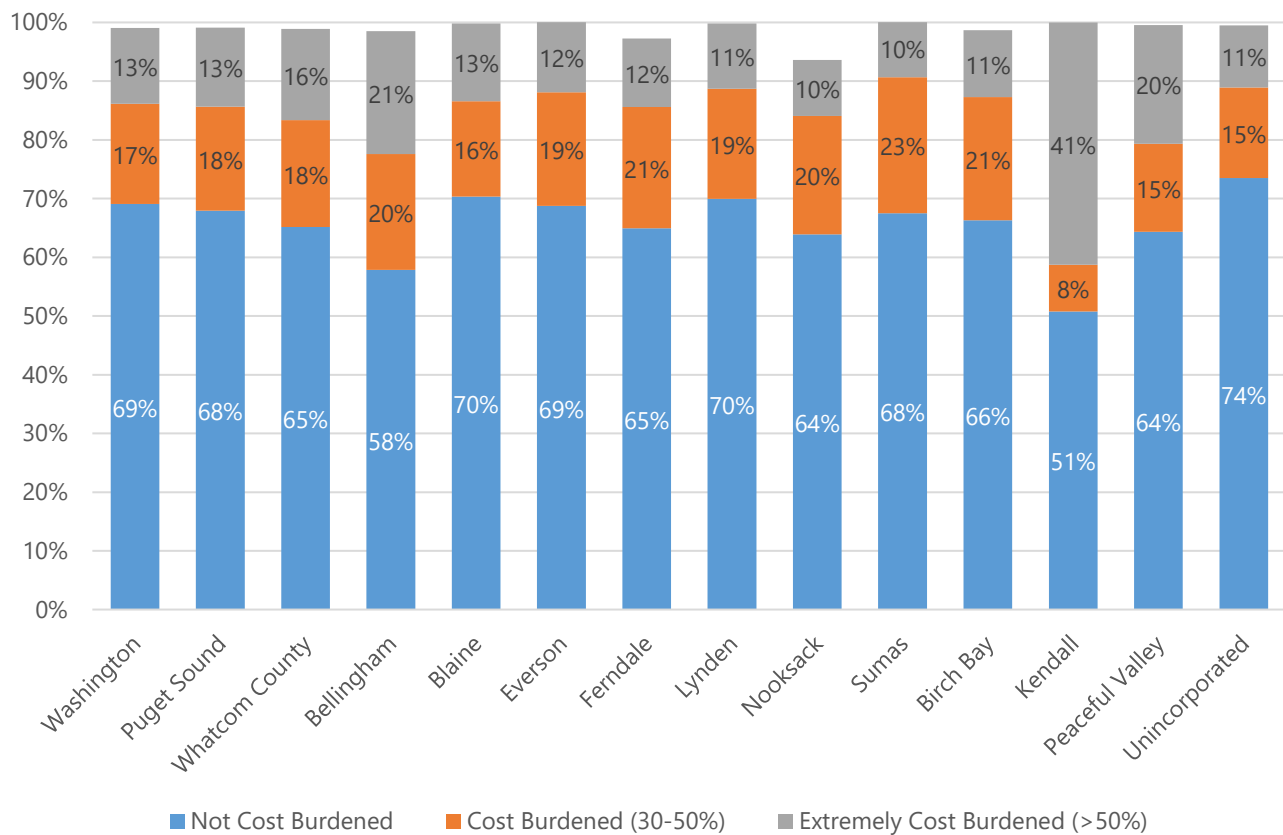


Source: US Department of Housing and Urban Development 2017-2021 Comprehensive Housing Affordability Strategy (CHAS).

Note: Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas refer to the areas within each city boundary. Birch Bay, Kendall, and Peaceful Valley are Census Designated Places (CDPs). Unincorporated includes the areas outside of city limits, excluding the Birch Bay, Kendall, and Peaceful Valley CDPs.

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. Whatcom County has a higher share of cost burdened households than the state at 34 percent (30 percent of Washington households are cost burdened). Bellingham and the Kendall CDP have the highest rates of cost burden, at 41 and 49 percent, respectively. With more than one third of households spending more than 30 percent of their income on housing, Whatcom County needs more housing at price points that better align with local incomes.

Figure 20. Share of Cost Burdened Households, Whatcom County, 2021

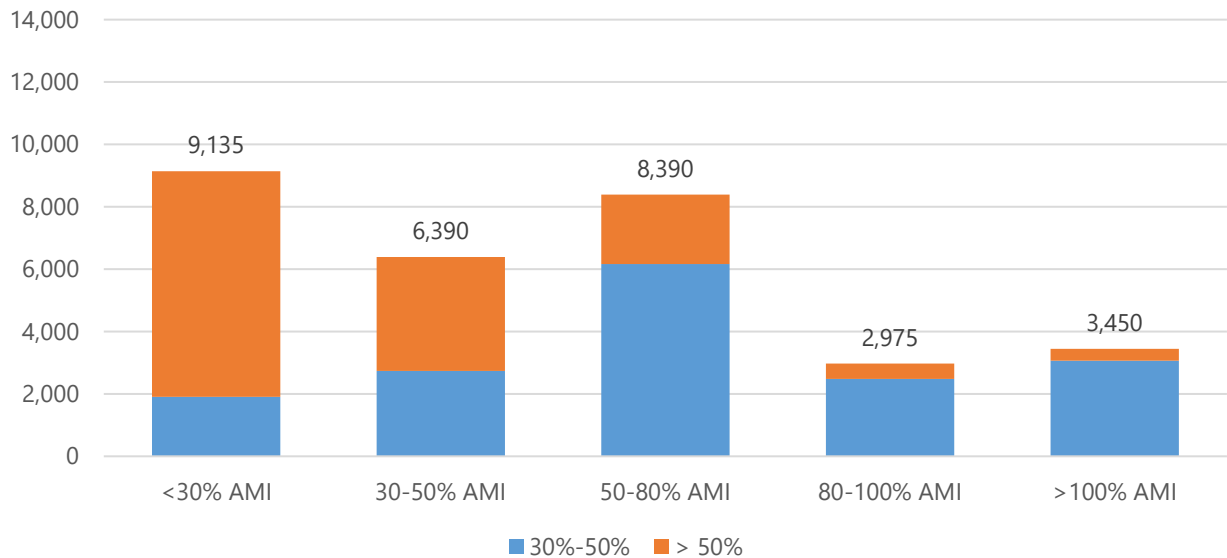


Source: US Department of Housing and Urban Development 2017-2021 Comprehensive Housing Affordability Strategy (CHAS).

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The US Department of Housing and Urban Development (HUD) defines cost-burdened households as those spending more than 30 percent of their income on housing costs. Within Whatcom County, there are cost-burdened households at all income levels. Among households making less than 30 percent AMI are cost burdened, over 9,000 are cost burdened with 7,230 of those households spending more than 50 percent of their income on housing. At the higher end of the income spectrum, there are fewer severely cost burdened households. However, over 6,400 households making at least 80 percent AMI are cost burdened.

Figure 21. Cost Burdened Households by Income Level, Whatcom County, 2021



	Percent of Income Spent on Housing in Whatcom County		
Income Band	< 30%	30-50%	> 50%
< 30% AMI	19%	17%	64%
30-50% AMI	28%	31%	41%
50-80% AMI	47%	39%	14%
80-100% AMI	69%	26%	5%
> 100% AMI	92%	7%	1%

Source: US Department of Housing and Urban Development 2017-2021 Comprehensive Housing Affordability Strategy (CHAS).

As Whatcom County and its cities consider future land use changes, they should be mindful of existing displacement pressures on local communities and neighborhoods. The Washington Department of Commerce has created a draft Displacement Risk Map to help cities and counties understand where residents are most at risk of gentrification and displacement. The map is based on Census tract data – in Whatcom County, this means that some of the data includes areas both within and outside of city limits. The categories used to denote displacement risk include High Risk, Moderate Risk, Low Risk, Demographic and Market Change, and N/A (where there is not sufficient Census data to inform the risk assessment). The WA Department of Commerce uses the matrix in Figure 22 below to determine the risk level of each Census tract. This framework is based on three potential indicators of displacement as

shown in the table. These indicators are all benchmarked based on relationship with the County average (for example a "high" rent is above the 60th percentile of the County, etc.):

- **Social Vulnerability** (characterized by current high share of BIPOC residents, current high share of renters, and current low median household income)
- **Demographic Change** (characterized by decreases in BIPOC residents and increases in median household incomes over the past decade)
- **Market Trends** (looking at if rents were high a decade ago and if they have increased since then)

The combination of the indicators in the first three columns of the table determines the displacement risk "score" in the right column. Various combinations of indicators can lead to high, moderate, or low displacement risk scores, as determined by Commerce's methodology.

The "Demographic & Market Change" category indicates that in that Census Tract, there has been a decrease in BIPOC residents, an increase in household incomes, and that rents were high in 2015 and have increased since then. This indicates that in this area, some displacement due to demographic and market pressures may have occurred in the past decade.

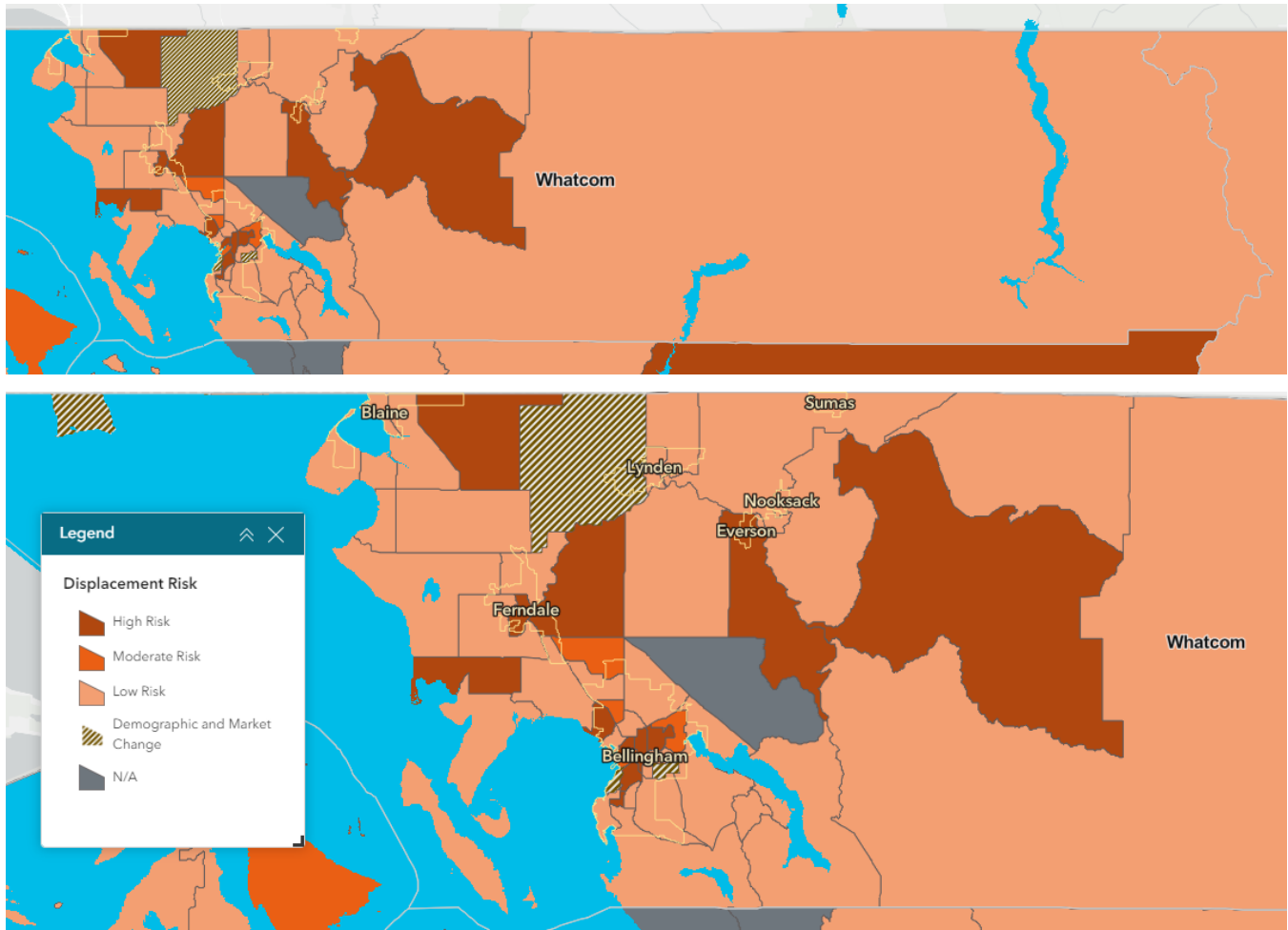
Figure 22. Washington Department of Commerce Displacement Risk Evaluation Matrix

Social Vulnerability	Demographic Change	Market Trends	Displacement Risk
Yes	Gentrification	Accelerating or Stable	High
Yes	No	Accelerating	High
No	Gentrification	Accelerating	High
Yes	No	Appreciated or Stable	Moderate
Yes	Disinvestment	Accelerating	Moderate
Yes	Disinvestment	Appreciated or Stable	Low
No	Gentrification	Stable	Low
No	No or Disinvestment	Appreciated, Accelerating, or Stable	Low
Yes or No	Gentrification	Appreciated	Demographic & Market Change

Source: Washington Department of Commerce Draft Displacement Risk Map.

According to the Washington Department of Commerce’s draft Displacement Risk Map, the areas with the highest displacement risk are located primarily within the municipalities in the western portion of the County. Everson, Ferndale, and Bellingham in particular have significant areas of high displacement risk. There are also significant areas of high displacement risk south of Everson and in the area that includes Kulshan, Van Zandt, Kendall, and Peaceful Valley. The western portion of Lynden has already experienced demographic and market change, as described above. The combination of high cost burden and displacement risk in some of these areas indicates that there is a significant need for additional housing at prices that local residents can afford.

Figure 23. Displacement Risk Maps for Whatcom County



Source: Washington Department of Commerce Draft Displacement Risk Map.

Future Housing Demand

Figure 24 below shows the preliminary population and housing unit targets by UGA and for the Rural & Resource Lands (County Resolution 2025-011, modified by County Council in March 2026). The total countywide housing unit target is 35,229 homes, with over half of those units located in Bellingham. While the County does not have to actually build or finance the construction of these units by 2045, it does need to ensure that it has adequate zoned land capacity to accommodate this number of homes.

Figure 24: Population and Housing Growth Targets 2023-2045

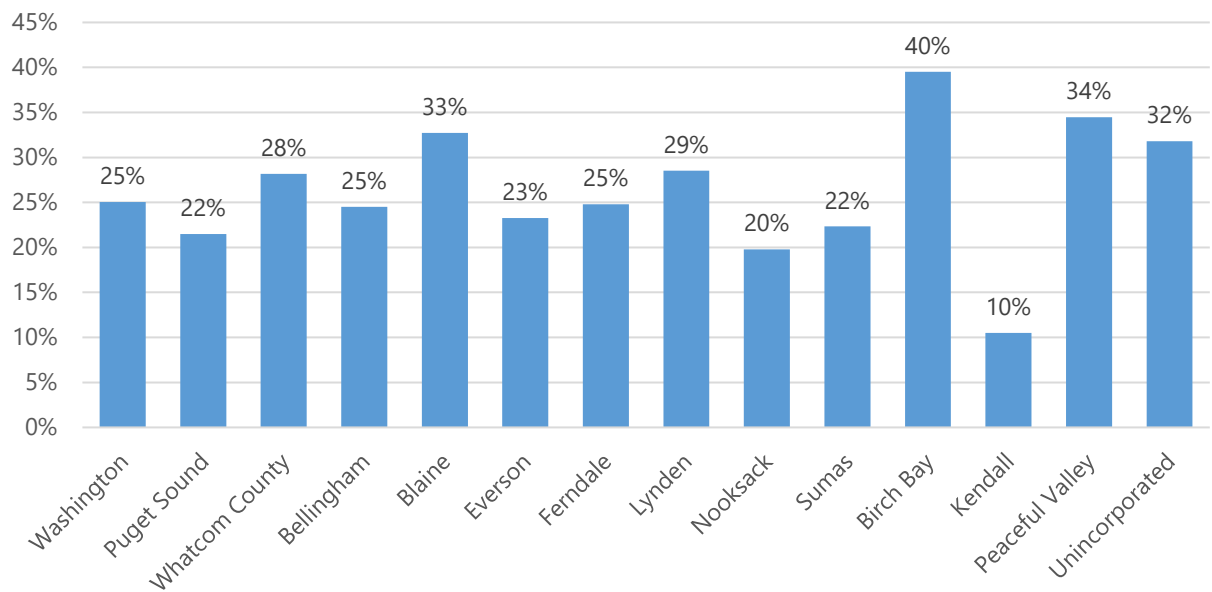
	Population	Population Share	Housing Units	Housing Unit Share
Bellingham City & UGA	30,310	46.0%	18,390	52.2%
Birch Bay UGA	2,662	4.0%	981	2.8%
Blaine City & UGA	3,500	5.3%	1,774	5.0%
Cherry Point UGA	0	0.0%	0	0.0%
Columbia Valley UGA	1,137	1.7%	433	1.2%
Everson City & UGA	1,408	2.1%	610	1.7%
Ferndale City & UGA	10,961	16.6%	4,659	13.2%
Lynden City & UGA	6,665	10.1%	3,535	10.0%
Nooksack City & UGA	995	1.5%	433	1.2%
Sumas City & UGA	1,000	1.5%	643	1.8%
Rural and Resource Lands	7,243	11.0%	3,771	10.7%
Total	65,881	100.0%	35,229	100.0%

Source: Whatcom County Non-Binding Multi-Jurisdictional Resolution No. 2025-011, Adopted March 11, 2025, subsequently modified by County Council in March 2026 for Rural and Resource Lands, Birch Bay UGA, and Columbia Valley UGA.

Special Housing Needs

The term “special housing” refers to types of housing that are not typically delivered by regular market forces. This includes shelters, permanent supportive, accessible, and senior housing. There are nearly 25,700 households in Whatcom County headed by a householder aged 65 or older. Nearly 11,000 of these households are seniors living alone. Birch Bay has the highest share of seniors among Whatcom County jurisdictions, followed by Peaceful Valley and Blaine. Whatcom County has a higher share (28 percent) of senior householders than the state overall (25 percent).

Figure 25. Share of Households with Householders 65 or Older, Whatcom County, 2022

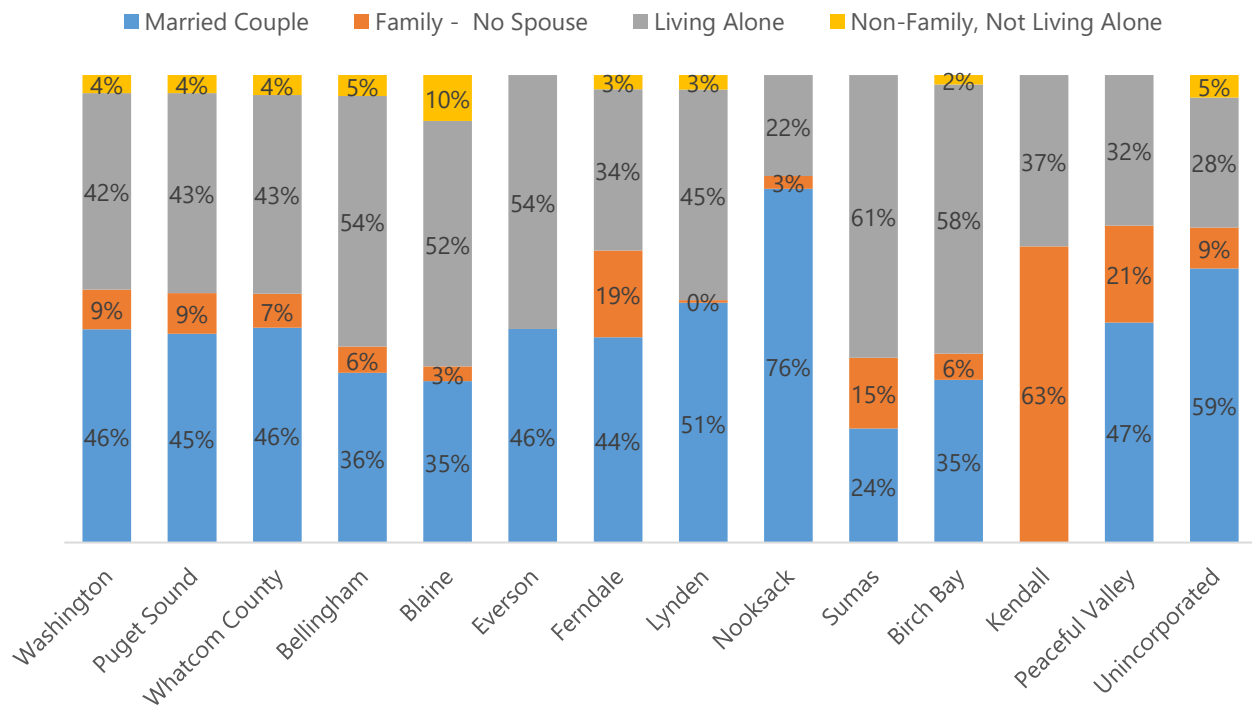


Source: US Census 2022 5-Year ACS, Tables S2501, DP05.

Note: Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas refer to the areas within each city boundary. Birch Bay, Kendall, and Peaceful Valley are Census Designated Places (CDPs). Unincorporated includes the areas outside of city limits, excluding the Birch Bay, Kendall, and Peaceful Valley CDPs.

In Whatcom County, 43 percent of seniors live alone. In Sumas (61 percent), Birch Bay (58 percent), Bellingham (54 percent), Everson (54 percent), and Blaine (52 percent), more than half of seniors live by themselves. In Bellingham, nearly 5,300 seniors (54 percent) live alone. This indicates that there is likely a need for small housing units with enhanced accessibility features that would let this cohort age in place, particularly in areas where they can easily access their everyday needs.

Figure 26. Living Arrangements among Senior Households, Whatcom County, 2022

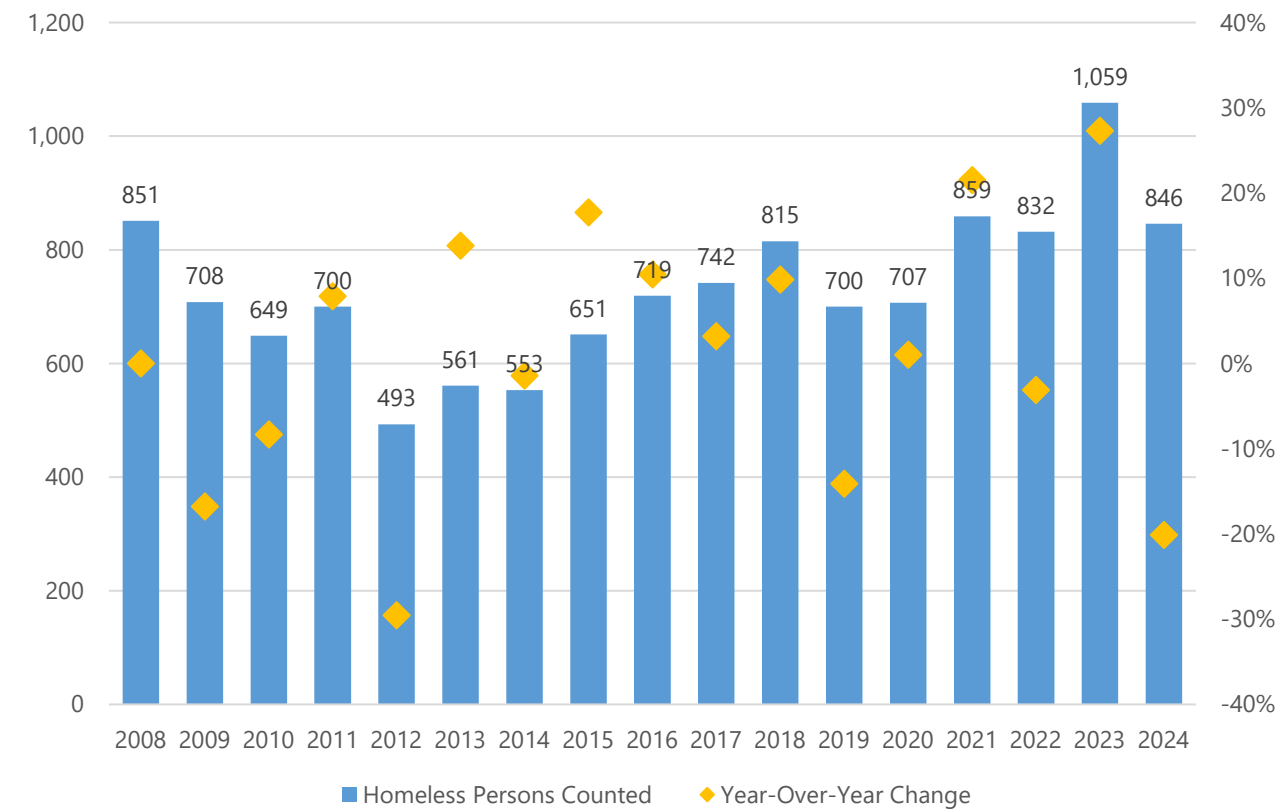


Source: US Census 2022 5-Year ACS, Table S2501.

Note: Bellingham, Blaine, Everson, Ferndale, Lynden, Nooksack, and Sumas refer to the areas within each city boundary. Birch Bay, Kendall, and Peaceful Valley are Census Designated Places (CDPs). Unincorporated includes the areas outside of city limits, excluding the Birch Bay, Kendall, and Peaceful Valley CDPs.

As of 2024, the annual Point-in-Time Count found that there were 846 homeless residents in Whatcom County, down from 1,059 in 2023. This represents a 20 percent decrease, bringing the number of homeless residents countywide down to 2022 levels. However, there was a significant increase in families with children experiencing unsheltered homelessness, despite decreases in homelessness among other household types. As of January 2024, 81 families with children were experiencing unsheltered homelessness and 61 families with children were counted in shelters. Nearly 30 percent of homeless individuals were unsheltered at the time of the 2024 count, a slight reduction from the 33 percent unsheltered in 2023. The County's 2024 Homelessness Report emphasizes that the expiration of federal funding for eviction prevention in 2023 limits the amount of funding available for preventing homelessness. For nearly 70 percent of Whatcom County's homeless residents, their last permanent address was within the county. Housing affordability was the most commonly cited cause of homelessness. There were 850 homeless households in 2023, with an average of 1.25 people per household. In 2008, there were 851 homeless residents in 506 households, an average of 1.68 people per household. This suggests a potential shift in demographics, with an increase in the number of homeless individuals. As of 2023, 88 percent of homeless households were unaccompanied individuals.

Figure 27. Whatcom County Point-In-Time Homeless Census and Annual Change in Persons Counted, 2008-2024



Source: Whatcom County Annual Homeless Census (2023); Whatcom County 2024 Point in Time Count.

In order to address the increase in homelessness in Whatcom County, there will be a need for a combination of emergency housing, permanent supportive housing, and affordable housing targeted to individuals making less than 30 percent AMI. In addition, as 15.5 percent of homeless residents are seniors and 28 percent have physical disabilities, there will likely be a need for more accessible affordable housing options.

Workforce Profile

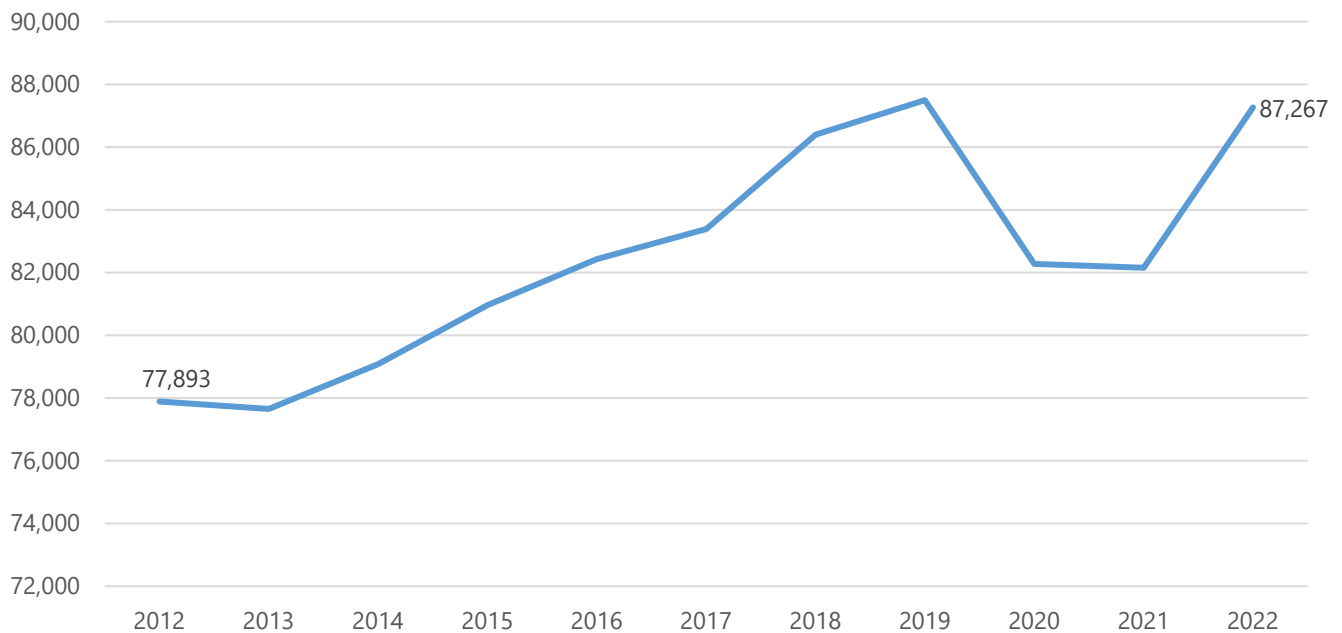
Local Workforce Characteristics

Bellingham is the major job center in Whatcom County – it is home to nearly 60 percent of all jobs in the county. In addition, nearly 22 percent of jobs are located in unincorporated Whatcom County.

The jobs data below comes from LEHD OntheMap. The most recent data year available is 2022 – this is just two years after the mandated business closures during the COVID-19 pandemic, and many job sectors were still recovering from pandemic-related impacts. As of 2022, Whatcom County had

recovered nearly all the jobs lost in 2020. As of 2022, there were 87,267 jobs in Whatcom County, up from 77,893 in 2012 and just below the peak of 87,496 in 2019.

Figure 28. Total Jobs in Whatcom County, 2012-2022



Source: LEHD OntheMap.

Health Care and Social Assistance is the largest job sector in Whatcom County as well as one of the fastest-growing, with a 34 percent increase in jobs between 2012 and 2022. Construction industry jobs in the county grew by 45 percent over the same period.

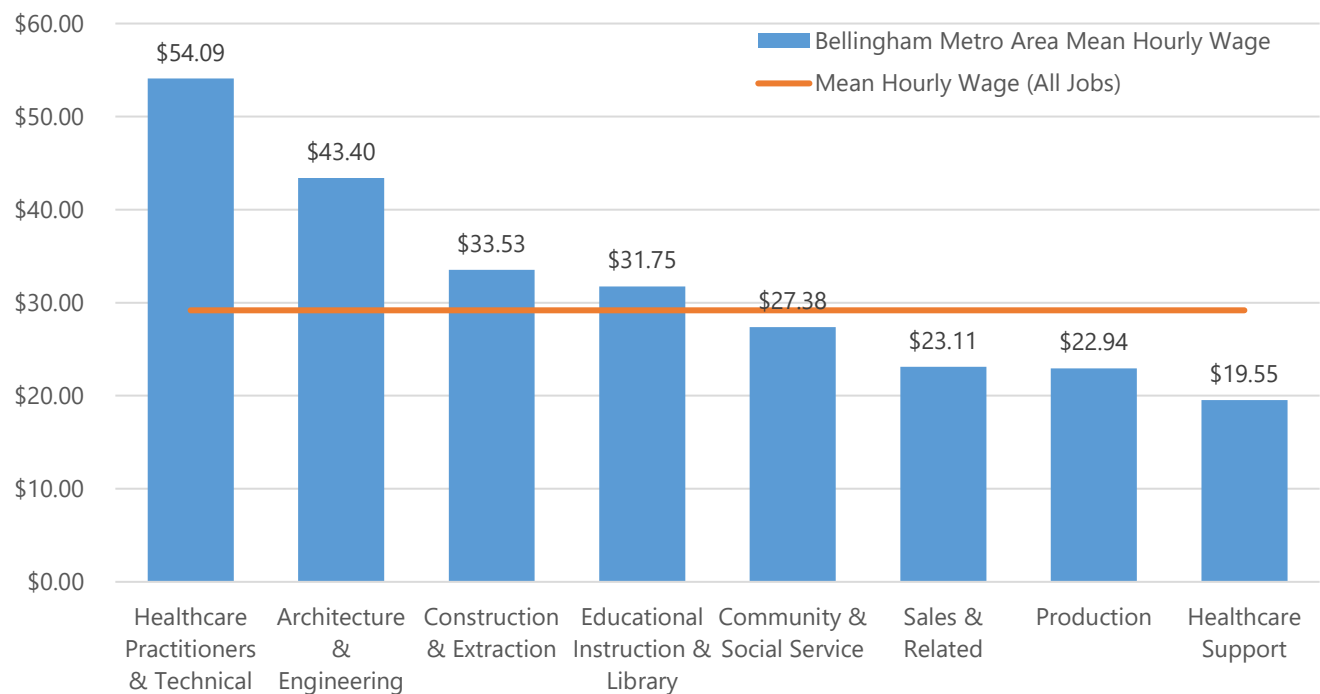
Figure 29. Whatcom County Jobs by Sector, 2012-2022

	2012	2022	Change	Pct. Change
Health Care and Social Assistance	9,575	12,869	3,294	34%
Construction	5,545	8,019	2,474	45%
Professional, Scientific, and Technical Services	3,060	4,252	1,192	39%
Educational Services	8,590	9,423	833	10%
Finance and Insurance	1,598	2,374	776	49%
Accommodation and Food Services	7,086	7,828	742	10%
Administration & Support, Waste Management and Remediation Services	3,359	4,034	675	20%
Real Estate and Rental and Leasing	843	1,322	479	57%
Manufacturing	8,668	9,004	336	4%
Wholesale Trade	2,468	2,796	328	13%
Agriculture, Forestry, Fishing and Hunting	2,666	2,951	285	11%
Transportation and Warehousing	2,232	2,452	220	10%
Retail Trade	8,691	8,785	94	1%
Utilities	223	203	(20)	-9%
Mining, Quarrying, and Oil and Gas Extraction	204	126	(78)	-38%
Other Services (excluding Public Administration)	3,364	3,176	(188)	-6%
Arts, Entertainment, and Recreation	2,434	2,203	(231)	-9%
Management of Companies and Enterprises	600	333	(267)	-45%
Information	1,727	1,356	(371)	-21%
Public Administration	4,960	3,761	(1,199)	-24%
	77,893	87,267	9,374	12%

Source: LEHD OntheMap.

As of May 2022, the mean hourly wage in the Bellingham Metro Area (which includes all of Whatcom County), is \$31.78 (roughly \$66,100 in gross annual income). Figure 30 below shows the mean hourly wage for jobs in the top employment sectors in Whatcom County.

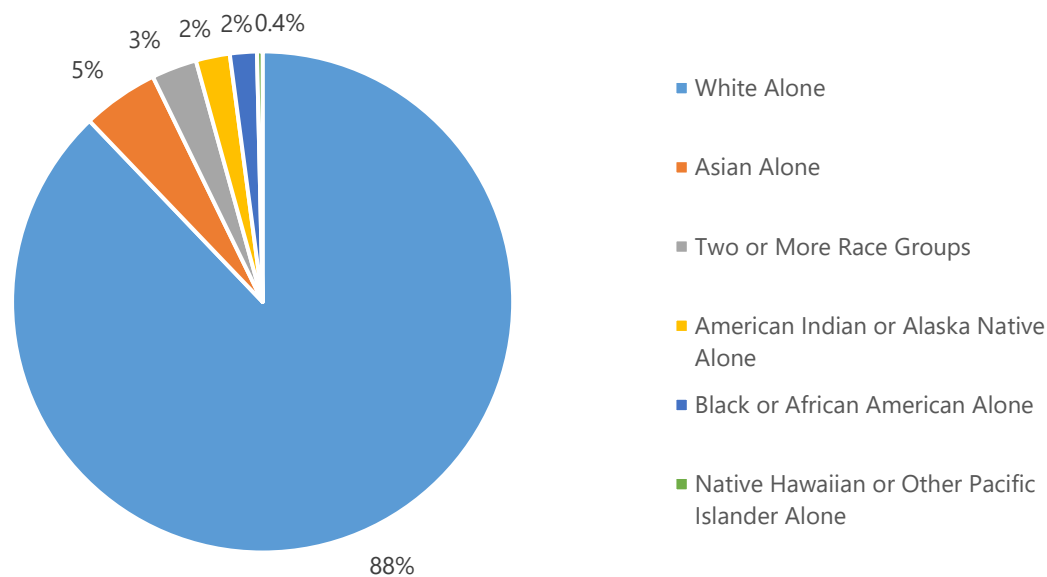
Figure 30. Bellingham Metro Area Mean Hourly Wage for Jobs in Top Employment Sectors, 2023



Source: US Bureau of Labor & Statistics.

As of 2022, 88 percent of workers with jobs in Whatcom County were white, compared with 80 percent of the County’s population. While just one percent of the County’s population is Black/African American, the same is true for just two percent of workers.

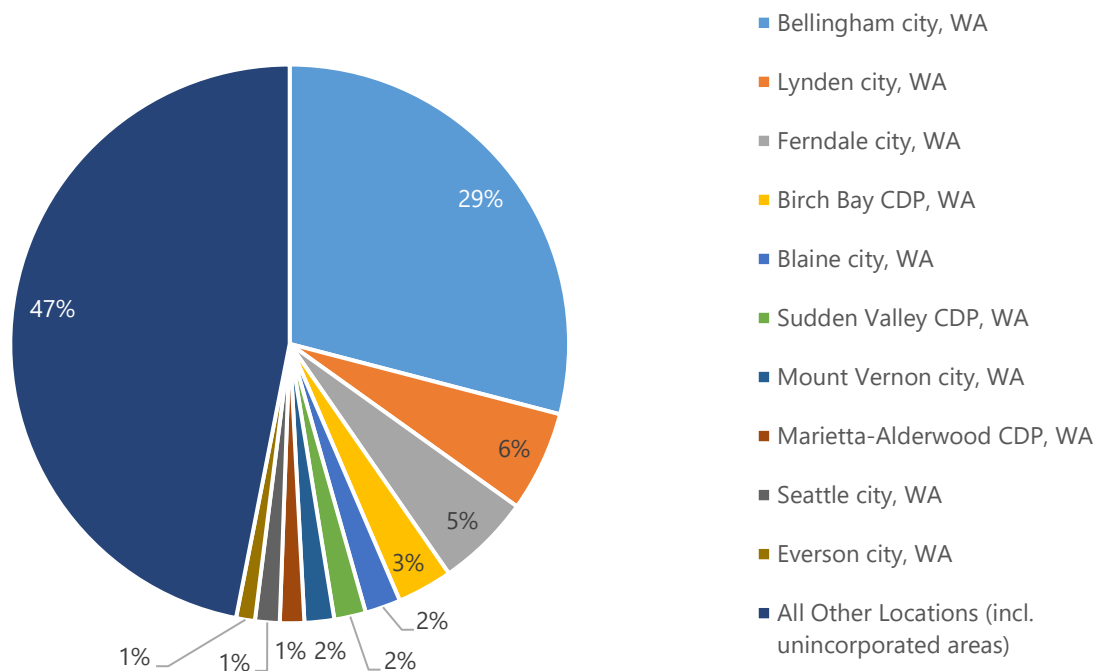
Figure 31. Whatcom County Workers by Race, 2022



Source: LEHD OntheMap.

Jobs in Whatcom County are largely held by local residents, with 29 percent of workers living in the city of Bellingham. However, there are also around 1,500 commuters from Mount Vernon and over 1,200 from Seattle working in Whatcom County. In all, 21,405 people commute to Whatcom County for work while 30,395 Whatcom County residents commute to jobs outside of the county. Over half of jobs in the county are worked by county residents.

Figure 32. Home Locations of Whatcom County Workers, 2022



Source: LEHD OntheMap.

Figure 33. Whatcom County Commuting Patterns, 2022



Source: LEHD OntheMap. "Living locally" refers to people that both live and work in Whatcom County.

There are 96,257 employed residents in Whatcom County. Nearly 51,000 of these employed residents (53 percent) are between the ages of 30 and 54. The top five sectors in which Whatcom County residents work align with the top five county job sectors – Health Care and Social Assistance, Retail Trade, Educational Services, Manufacturing, and Accommodation and Food Services.

Figure 34. Jobs Worked by Whatcom County Residents by Sector, 2012-2022

	2012	2022	Change	Pct. Change
Health Care and Social Assistance	10,067	13,931	3,864	38%
Retail Trade	9,533	10,502	969	10%
Educational Services	8,652	9,947	1,295	15%
Manufacturing	8,572	9,145	573	7%
Accommodation and Food Services	6,925	8,129	1,204	17%
Construction	4,933	7,823	2,890	59%
Professional, Scientific, and Technical Services	3,404	5,270	1,866	55%
Public Administration	5,274	4,494	(780)	-15%
Administration & Support, Waste Management and Remediation Services	3,582	4,473	891	25%
Wholesale Trade	2,894	3,502	608	21%
Other Services (excluding Public Administration)	4,067	3,289	(778)	-19%
Transportation and Warehousing	2,510	3,211	701	28%
Agriculture, Forestry, Fishing and Hunting	2,554	2,768	214	8%
Finance and Insurance	1,901	2,634	733	39%
Arts, Entertainment, and Recreation	2,492	2,386	(106)	-4%
Information	1,621	1,996	375	23%
Real Estate and Rental and Leasing	966	1,408	442	46%
Management of Companies and Enterprises	788	932	144	18%
Utilities	249	277	28	11%
Mining, Quarrying, and Oil and Gas Extraction	256	140	(116)	-45%
	81,240	96,257	15,017	18%

Source: LEHD OntheMap.

Note: This table includes jobs held by people living in Whatcom County. The jobs themselves may be outside of the county.

Figure 35 below shows jobs and local workers by sector in Whatcom County. The industries with the highest oversupply of local workers include Healthcare, Retail, and Professional Services. This indicates that many of these workers commute out of the county. Conversely, the Construction sector in Whatcom County relies on workers from other locations.

Figure 35. Jobs and Local Workers by Sector in Whatcom County, 2022

	Jobs	Local Workforce	Difference
Health Care and Social Assistance	12,869	13,931	1,062
Retail Trade	8,785	10,502	1,717
Educational Services	9,423	9,947	524
Manufacturing	9,004	9,145	141
Accommodation and Food Services	7,828	8,129	301
Construction	8,019	7,823	(196)
Professional, Scientific, and Technical Services	4,252	5,270	1,018
Public Administration	3,761	4,494	733
Administration & Support, Waste Management and Remediation	4,034	4,473	439
Wholesale Trade	2,796	3,502	706
Other Services (excluding Public Administration)	3,176	3,289	113
Transportation and Warehousing	2,452	3,211	759
Agriculture, Forestry, Fishing and Hunting	2,951	2,768	(183)
Finance and Insurance	2,374	2,634	260
Arts, Entertainment, and Recreation	2,203	2,386	183
Information	1,356	1,996	640
Real Estate and Rental and Leasing	1,322	1,408	86
Management of Companies and Enterprises	333	932	599
Utilities	203	277	74
Mining, Quarrying, and Oil and Gas Extraction	126	140	14

Source: LEHD OntheMap.

Jobs to Housing Ratio

As of 2022, there were 87,267 jobs in Whatcom County according to the Census' LEHD dataset, and 102,942 housing units in 2022, according to OFM, for a jobs-to-housing ratio of 0.85. Most of the County's jobs (59 percent) are located in Bellingham, while another 21.6 percent are located in unincorporated areas. Blaine, Everson, Nooksack, Sumas, and unincorporated Whatcom County all have jobs to housing ratios under 1.0, indicating that there are more housing units than jobs in these areas.

Figure 36. Jobs to Housing Ratios for Whatcom County Cities (2022)

	Jobs	Housing Units	Ratio	Percent of Total
Bellingham	51,380	42,712	1.20	58.9%
Blaine	2,750	2,866	0.96	3.2%
Everson	643	1,067	0.60	0.7%
Ferndale	6,150	5,966	1.03	7.0%
Lynden	6,665	6,360	1.05	7.6%
Nooksack	277	547	0.51	0.3%
Sumas	541	729	0.74	0.6%
Whatcom County (unincorporated)	18,861	42,695	0.44	21.6%
Whatcom County (total)	87,267	102,942	0.85	

Source: US Census via LEHD OntheMap; Washington Office of Financial Management.

Employment Trends & Projections

Figure 37 shows preliminary employment targets for Whatcom County for each UGA and the Rural & Resource Lands (County Resolution 2011-011). The majority of job growth is expected in Bellingham, and the highest share of jobs are expected in Commercial sectors, with some industrial and retail growth as well.

Figure 37: 2023-2045 UGA Employment Growth Allocations

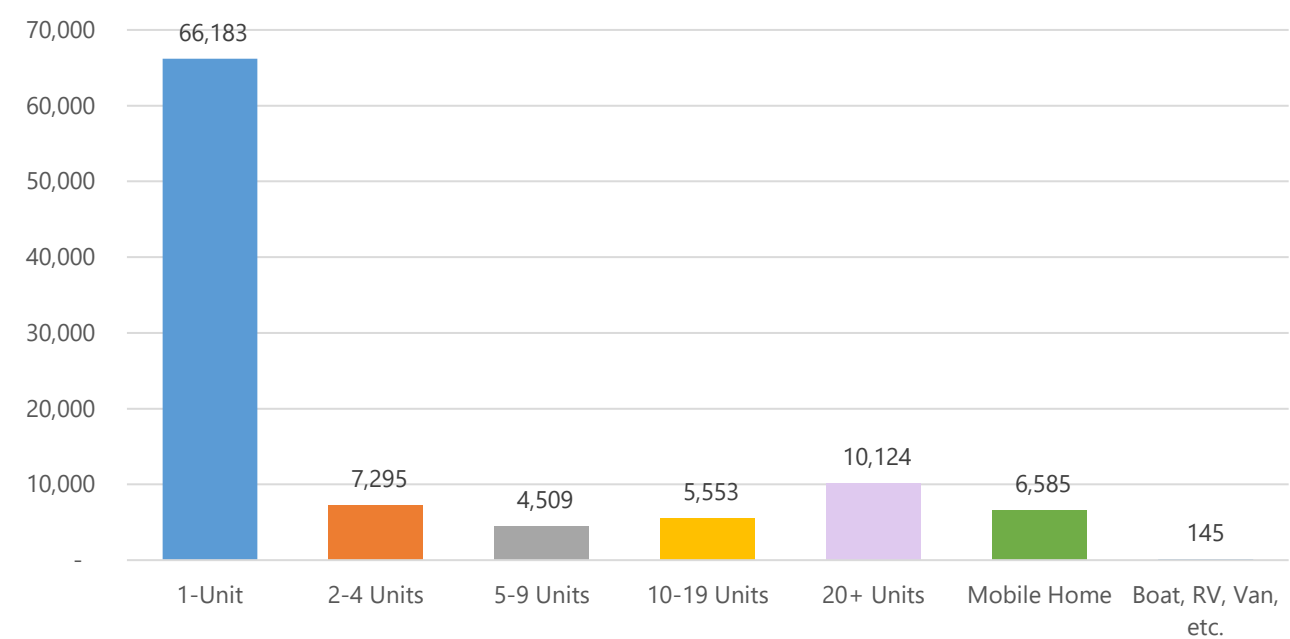
	Net New Employment	Employment Share
Bellingham City & UGA	19,384	59.9%
Birch Bay UGA	450	1.4%
Blaine City & UGA	1,092	3.4%
Cherry Point UGA	1,200	3.7%
Columbia Valley UGA	350	1.1%
Everson City & UGA	602	1.9%
Ferndale City & UGA	3,337	10.3%
Lynden City & UGA	1,799	5.6%
Nooksack City & UGA	232	0.7%
Sumas City & UGA	500	1.5%
Rural and Resource Lands	3,403	10.5%
Total	32,349	100.0%

Housing Supply

General Housing Inventory

There are 100,394 housing units in Whatcom County. The majority of these (66,183) are in single-unit (detached or attached) homes. Of the 27,481 multifamily units in Whatcom County, 37 percent are in buildings with 20 or more units.

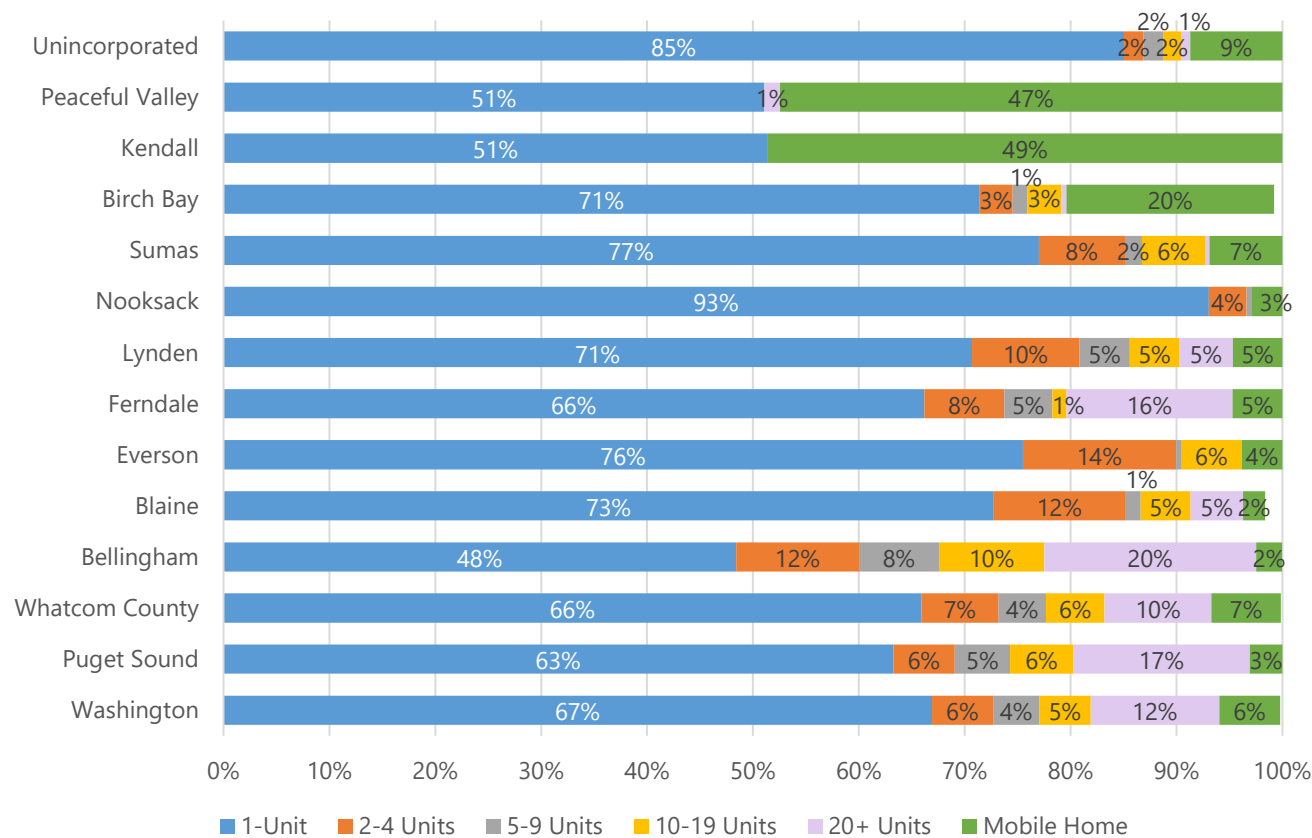
Figure 38. Number of Housing Units in Whatcom County by Type, 2022



Source: US Census Bureau 2022 5-Year ACS, Table DP04.

Statewide, 67 percent of homes are in attached or detached single-unit structures. Whatcom County has a similar share of single unit housing structures (66 percent). Bellingham has the lowest share of housing units in single-unit structures at 48 percent, followed by Peaceful Valley and Kendall (both 51 percent). In Nooksack, 93 percent of the 590 housing units are in single-unit structures.

Figure 39. Housing Units by Type in Whatcom County, the Puget Sound, and Washington, 2022



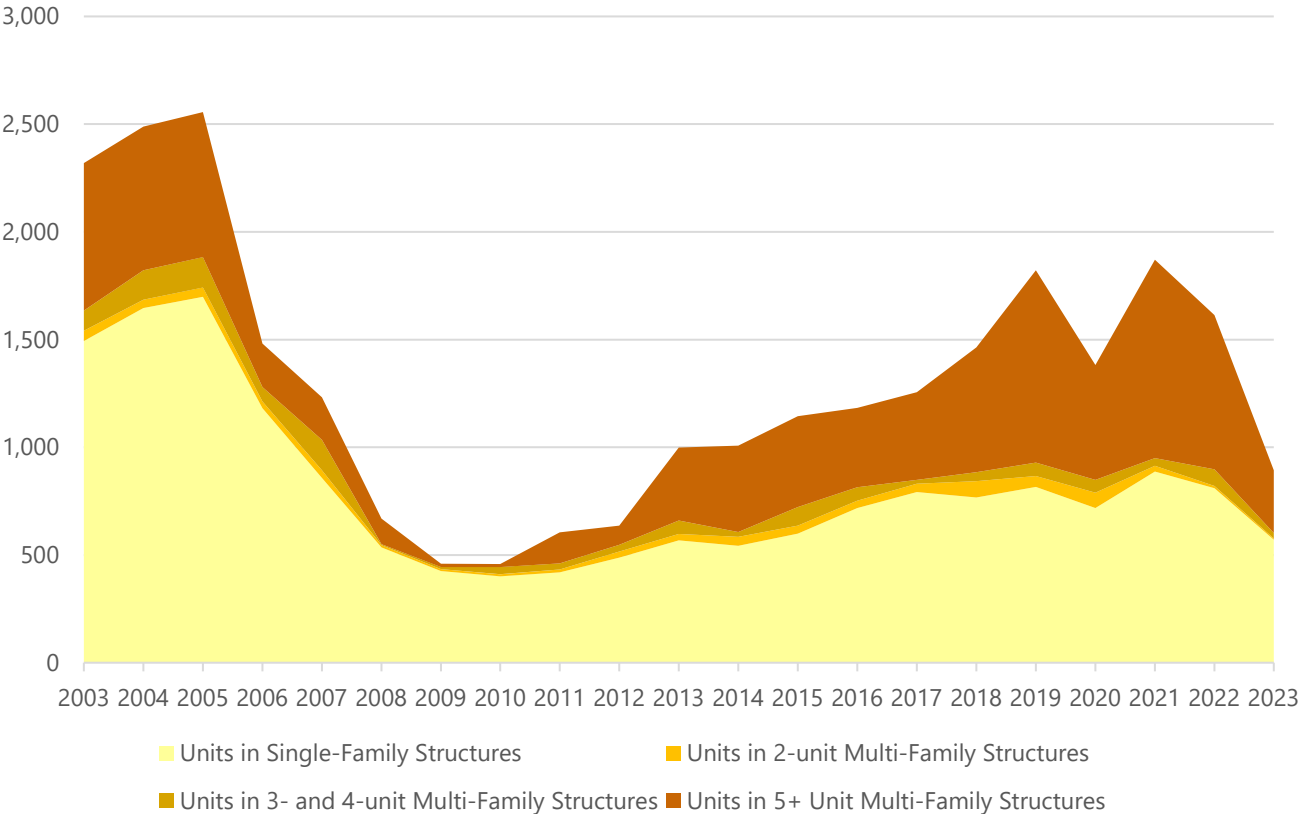
Source: US Census Bureau 2022 5-Year ACS, Table DP04.

Note: The housing category that includes boats, RVs, and vans is not included in this chart.

Housing Market Conditions

Over the last 20 years, 27,542 housing units have been permitted in Whatcom County. Of these, 61.5 percent of these were in single family structures and 38.5 percent were in multifamily structures. Over the past ten years, however, multifamily production has increased and now makes up 47 percent of new units permitted. Despite this uptick in denser construction, permitting has not recovered to its pre-Great Recession peak in Whatcom County.

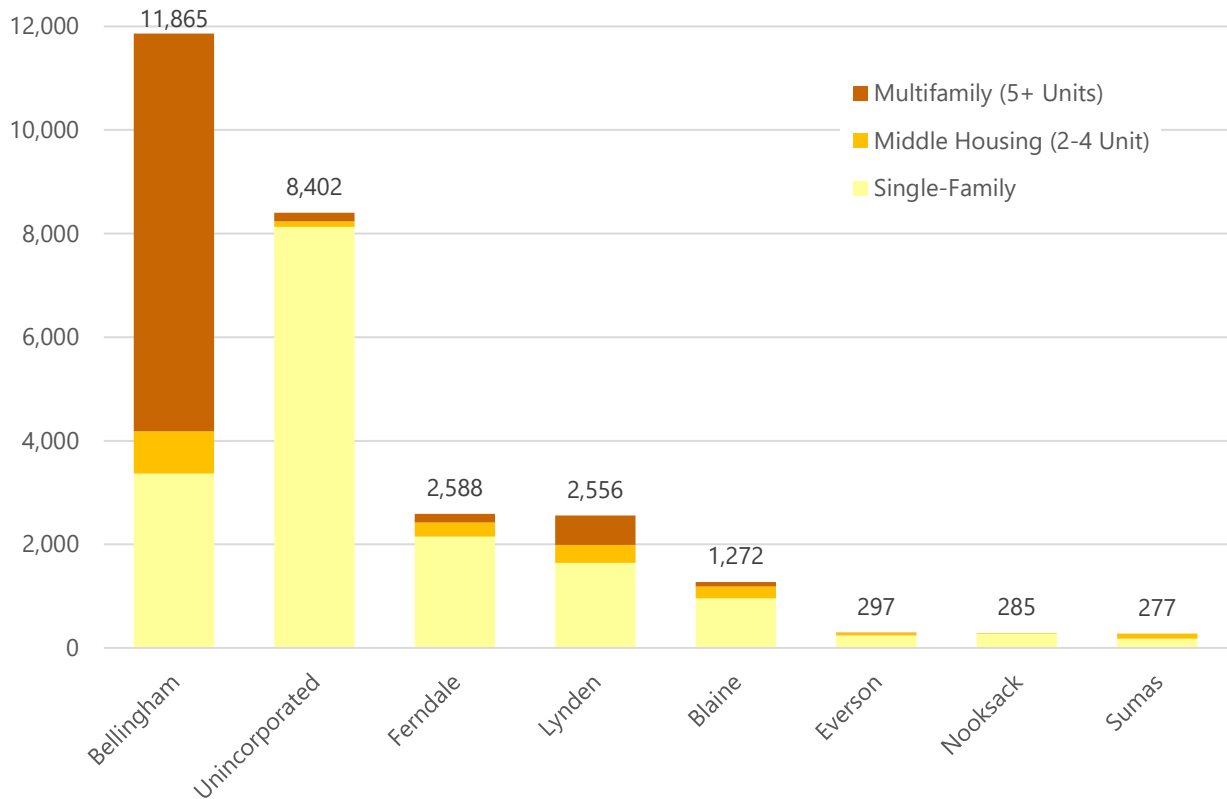
Figure 40. Housing Units Permitted in Whatcom County, 2003-2023



Source: US Census Bureau SOCDS Building Permit Database.

Most of the permitting activity over the past 20 years was in Bellingham, where nearly 12,000 new units were permitted (72 percent middle housing or multifamily), followed by unincorporated areas. Lynden permitted a higher share of multifamily units than the other smaller cities in Whatcom County.

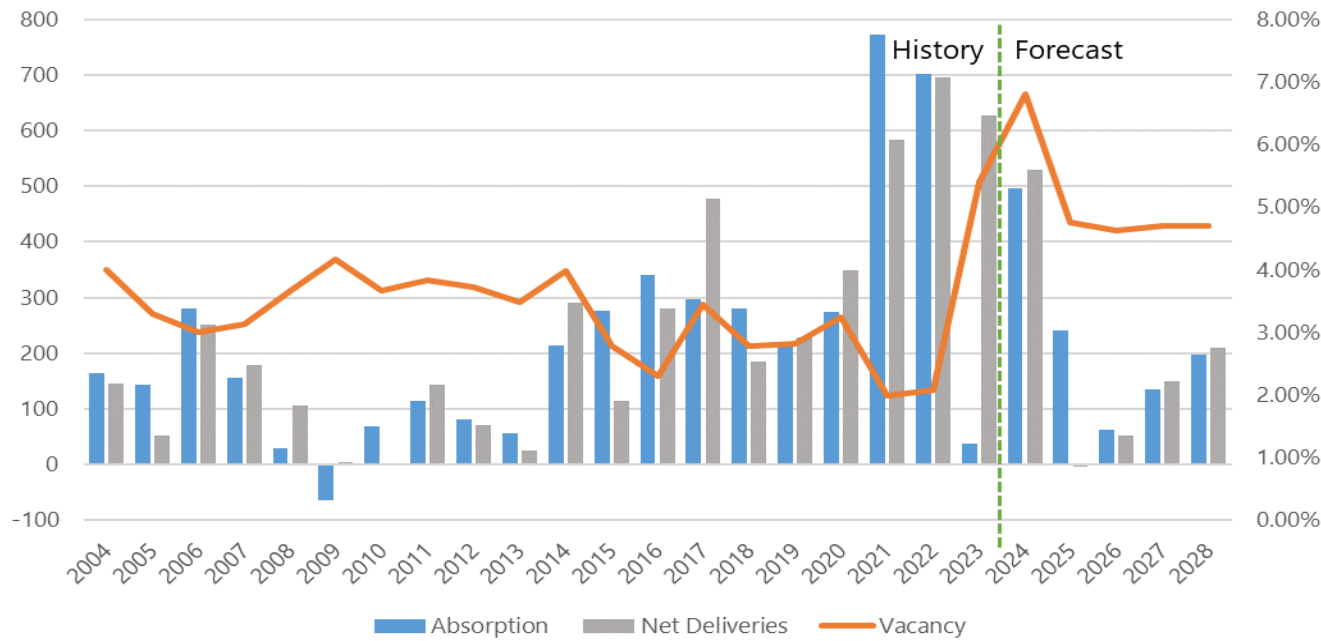
Figure 41. Housing Units Permitted by Type, 2003-2023



Source: US Census Bureau SOCDS Building Permit Database.

According to CoStar, there are around 18,100 multifamily rental housing units in Whatcom County. The vacancy rate for multifamily rental units in Whatcom County is 6.3 percent as of the second quarter of 2024. This is a significant increase from the vacancy rate in 2022, when it was just over two percent. The jump in vacancy rates is due to a large amount of new construction in 2023, when over 600 new multifamily units were delivered in ten buildings. While eight of the ten buildings were in Bellingham, new construction in 2023 also included a duplex in Everson and a 48-unit development in Blaine. The largest new multifamily building completed that year was the 177-unit Park Place Apartments in Bellingham. As of the second quarter of 2024, five new multifamily rental properties have been completed in the county, with a total of nearly 500 units. All of these properties are located in Bellingham. As new multifamily housing came online between 2021 and 2024, the vacancy rate increased to over six percent, but is expected to stabilize as those new units are absorbed.

Figure 42. Absorption, Net Deliveries, and Vacancy Rate for Whatcom County Multifamily, 2004-2028



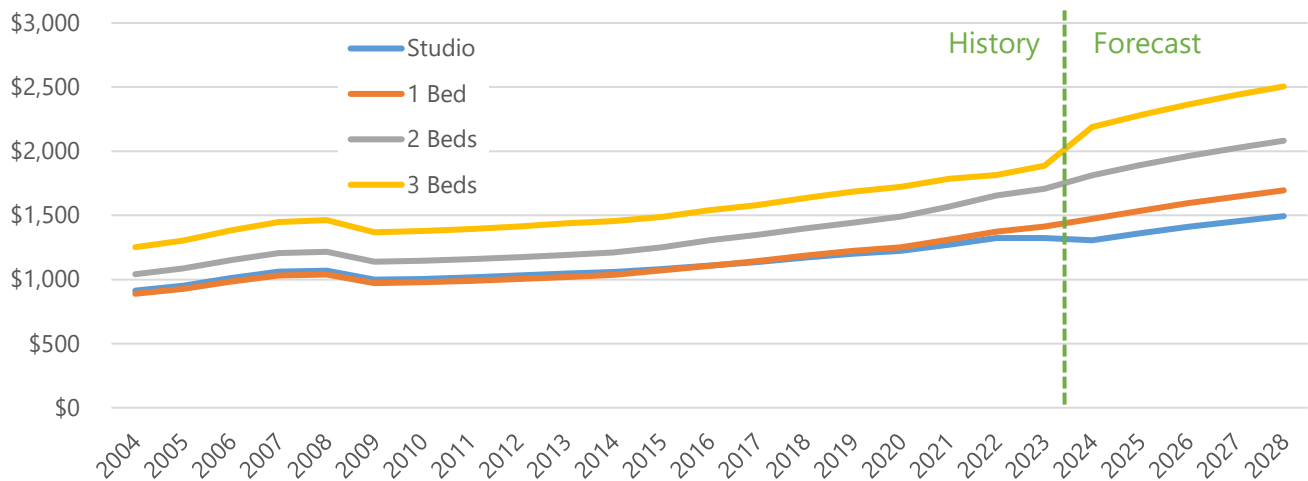
Source: CoStar.

Absorption refers to the change in occupancy over a given period. It is the total units occupied less the total units vacated.

Net Deliveries refers to the net total of new units added over a given period. It is the total units built less the total units removed from the market.

Between 2014 and 2024, the rent for two- and three-bedroom units has increased by around 50 percent, while rent for one-bedrooms increased by 42 percent and rent for studios increased by 23 percent. As of 2024, the market rent for a one-bedroom apartment unit is \$1,472. According to CoStar, this is expected to increase to \$1,695 by 2028. As of the second quarter of 2024, the market asking rent per square foot for apartments is \$2.03.

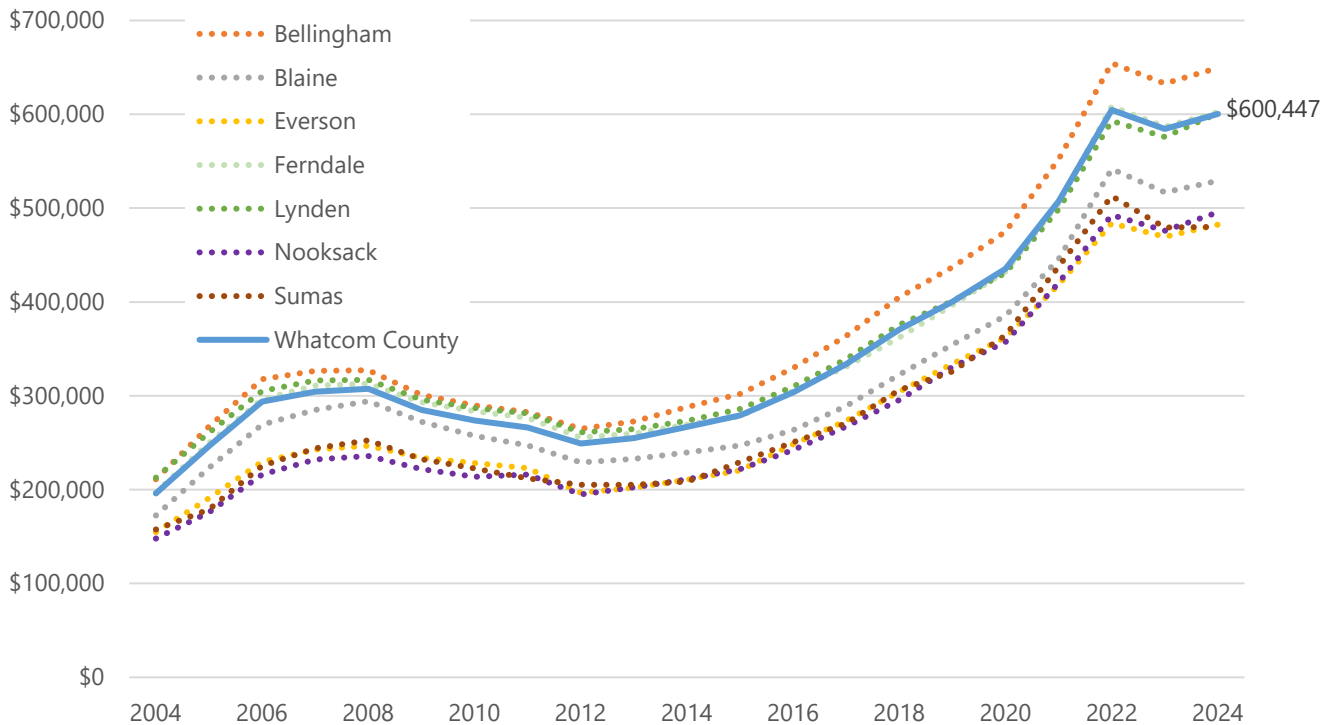
Figure 43. Market Asking Rent per Unit by Bedroom, Whatcom County



Source: CoStar

According to the Zillow Home Value Index, which reflects the typical value for homes in the 35th to 65th percentile range, as of April 2024 the typical home value in Whatcom County was nearly \$600,500. This is a 206 percent increase over the typical home value in 2004. Sumas and Everson have the lowest typical home prices (\$480,170 and \$482,332, respectively), while Bellingham has the highest (\$649,645).

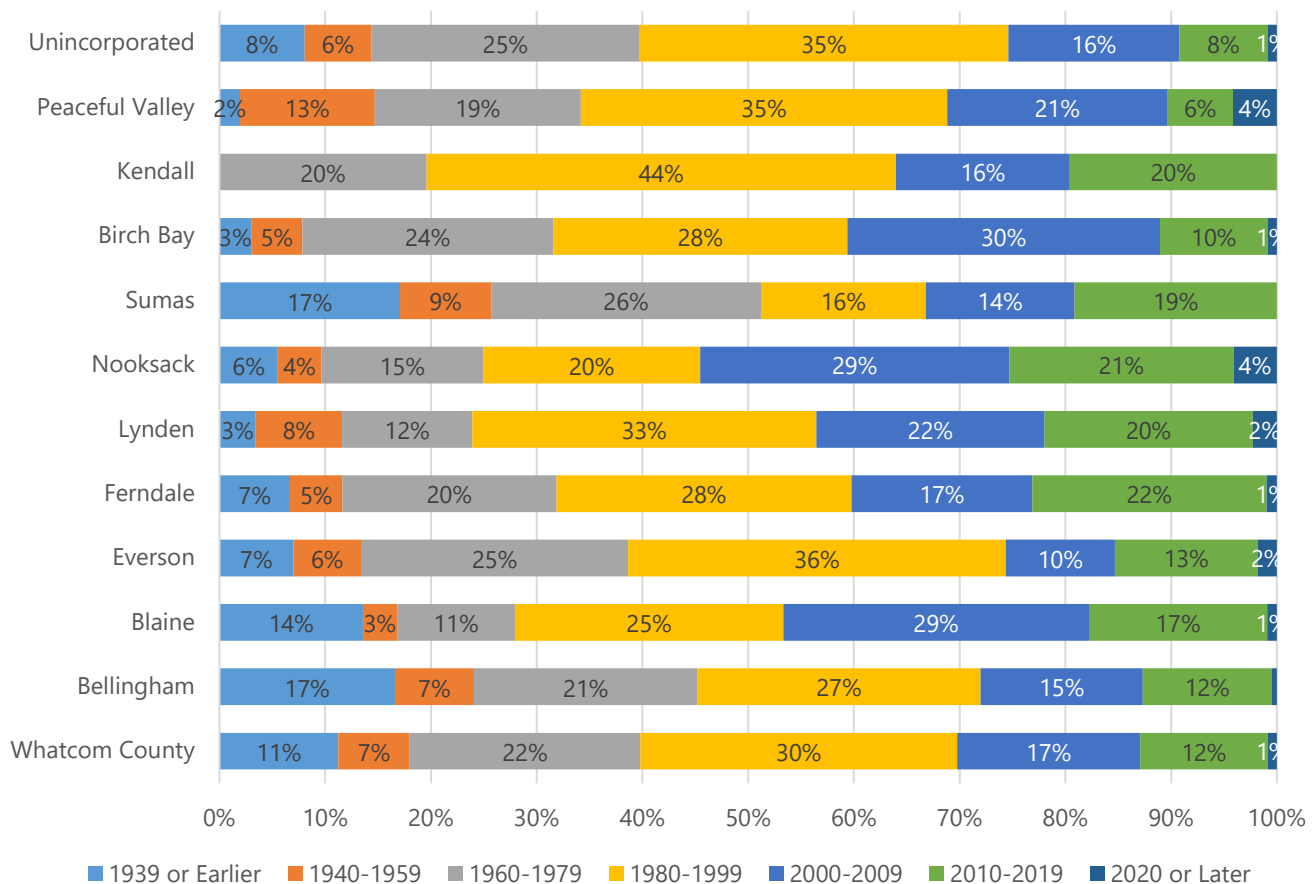
Figure 44. Typical Home Prices in Whatcom County and Select Jurisdictions



Source: Zillow Home Value Index (ZHVI). Values are as of April of each year.

Thirty percent of Whatcom County's 91,171 housing units were built between 2000 and 2022. More than half were built between 1960 and 1999. Sumas has the highest share of housing units built before 1960 (26 percent), while Nooksack has the highest share built between 2010 and 2022 (25 percent). Approximately 40 percent of housing units countywide were built before 1980. There will be a significant need in the coming years to rehabilitate the oldest units and to construct new housing to replace the oldest units.

Figure 45. Housing Units by Year Built in Whatcom County, 2022



Source: US Census Bureau 2022 5-Year ACS, Table S2504.

The US Department of Housing and Urban Development's Comprehensive Housing Affordability Strategy identifies four major housing problems. These are:

- Incomplete kitchen facilities
- Incomplete plumbing facilities
- More than one person per room (overcrowding)
- Cost Burden
 - o "Moderate" – household pays more than 30 percent of their income in housing costs
 - o "Severe" – household pays more than 50 percent of their income in housing costs

In Whatcom County, 30,784 households face at least one of these challenges, with 17,285 households facing severe cost-burden or a combination of severe cost-burden and one of the additional housing problems. Of the households with one or more housing problems, 56 percent are renters. This share jumps to 65 percent for severely cost-burdened households.

Figure 46. Housing Problems by Tenure in Whatcom County, 2021

	Owner	Rental	Total
Household has at least 1 of 4 Housing Problems	13,785	16,999	30,784
Household has none of 4 Housing Problems	40,554	15,177	55,731
Household has at least 1 of 4 Severe Housing Problems	6,455	10,830	17,285
Household has none of 4 Severe Housing Problems	49,620	22,960	72,580

Source: US Department of Housing and Urban Development 2017-2021 Comprehensive Housing Affordability Strategy (CHAS).

Special Housing Inventory

The table below in Figure 47 shows the existing stock of units in Whatcom County serving residents earning under 80 percent of the Area Median Income, including subsidized units serving 0-30 percent AMI households and Permanent Supportive Housing (PSH). As shown, the majority of lower-income and subsidized units, including all of the PSH units in the county, are in Bellingham.

Figure 47. Housing Units Serving Households Earning Under 80% AMI, 2023

	0-30%			
	Non-PSH	PSH	>30-50%	>50-80%
Bellingham City & UGA	1,207	586	4,119	16,782
Birch Bay UGA	197	0	975	1,292
Blaine City & UGA	169	0	246	728
Cherry Point UGA	0	0	1	1
Columbia Valley UGA	153	0	432	727
Everson City & UGA	30	0	120	371
Ferndale City & UGA	203	0	568	1,385
Lynden City & UGA	76	0	328	1,462
Nooksack City & UGA	0	0	29	150
Sumas City & UGA	30	0	83	272
LAMIRDS	335	0	853	990
Area Outside UGAs and LAMIRDS	797	0	2,032	2,369
Total	3,197	586	9,786	26,528

Source: Washington Department of Commerce Housing for All Planning Tool (HAPT), City of Bellingham, City of Blaine, City of Everson, City of Ferndale, City of Lynden, City of Nooksack, City of Sumas, Whatcom County, Leland Consulting Group

The table below in Figure 48 shows 2024 counts of shelters, supportive, and transitional housing in Whatcom County. There are facilities ranging from day shelters to transitional housing and permanent supportive housing in the county with a total of 2,521 beds.

Figure 48. Shelter, Transitional and Supportive Housing Counts, 2021

Type	Total Beds	Total Units
Emergency Shelter – Year-Round	509	144
Emergency Shelter – Seasonal and Hotel/Motels	387	111
Transitional Housing	210	76
PH – Housing with Services (no disability required)	422	188
PH – Permanent Supportive Housing (disability required)	386	333
PH – Rapid Re-Housing	607	252
Grand Total	2,521	1,104

Source: Whatcom County Health Department
Note: Housing with Services includes Group Homes and Care Facilities

The 2024 Point-In-Time Count found a total of 846 individuals experiencing homelessness in Whatcom County on a single night in January of 2024. This is a decrease from the much higher 2023 count of 1,059 individuals (850 households) and is more similar to the level of homelessness seen in 2021 and 2022, as shown below in Figure 49.

Figure 49. Whatcom County Homelessness Point-In-Time Count, 2020-2024

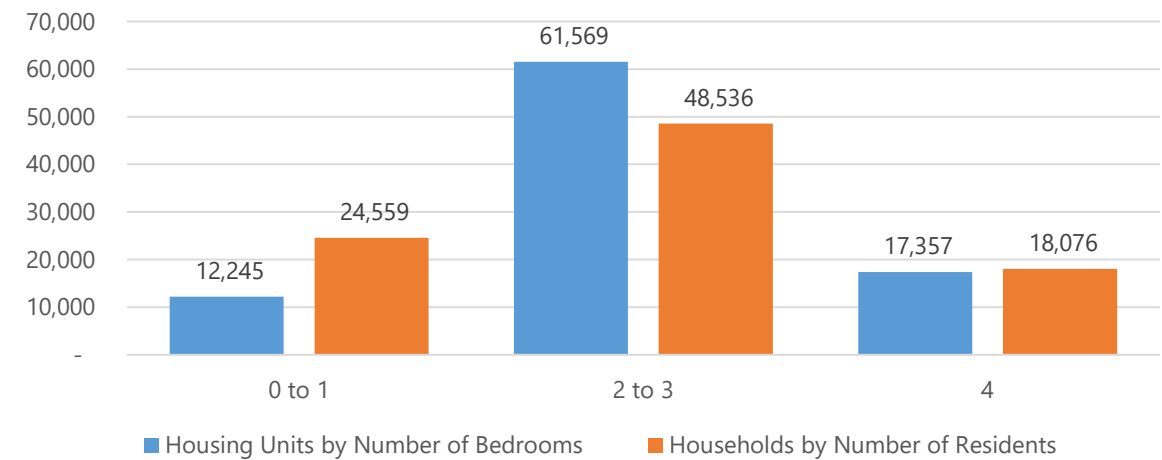
Persons	2020	2021	2022	2023	2024
Sheltered	489	641	650	711	603
Unsheltered	218	218	182	348	243
Total	707	859	832	1,059	846
Households	2020	2021	2022	2023	2024
Sheltered	379	434	482	520	465
Unsheltered	176	192	157	330	206
Total	555	626	639	850	671

Source: Whatcom County Health Department

Gap Analysis

The chart in Figure 50 below shows the households by number of residents compared with housing units by number of bedrooms in Whatcom County. The County has 24,559 one-person households but just 12,245 studio and one-bedroom housing units. In addition, the County has 34,885 households with just two people, some of whom may prefer to live in smaller, one-bedroom units (typically, the US Department of Housing and Urban Development assumes housing units will have 1.5 people per bedroom). This suggests that there is a shortage of smaller housing units countywide.

Figure 50. Housing Units by Number of Bedrooms vs. Households by Number of Residents in Whatcom County



Source: US Census Bureau 2022 5-Year ACS, Tables S2501 and S2504.

Figure 51. Housing Units by Number of Bedrooms, Whatcom County

	Whatcom County	Bellingham	Blaine	Everson	Ferndale	Lynden	Nooksack	Sumas	Birch Bay	Kendall	Peaceful Valley	Unincorporated
0 Bedrooms	3,885	3,086	80	59	179	149	-	-	82	-	47	203
1 Bedroom	8,360	5,850	156	29	318	313	38	56	432	-	101	1,067
2-3 Bedrooms	61,569	25,275	1,614	820	3,627	4,019	389	368	3,619	286	825	20,727
4 or More Bedrooms	17,357	5,874	479	137	1,055	1,305	134	109	713	-	63	7,488

Source: US Census Bureau 2022 5-Year ACS, Table S2501.

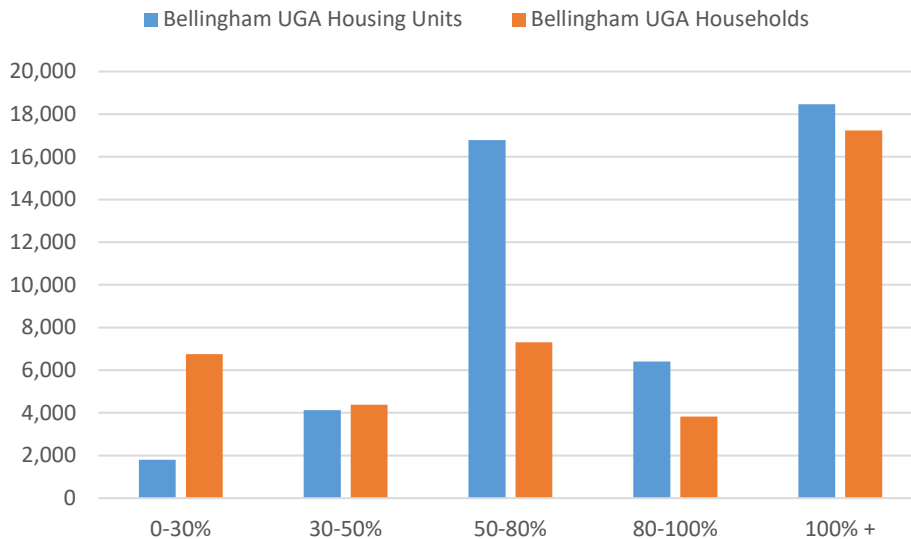
Figure 52. Households by Number of Residents, Whatcom County

	Whatcom County	Bellingham	Blaine	Everson	Ferndale	Lynden	Nooksack	Sumas	Birch Bay	Kendall	Peaceful Valley	Unincorporated
1-Person Household	24,559	13,467	838	222	985	1,505	125	189	1,610	30	289	5,299
2-Person Household	34,885	15,593	661	236	1,433	1,910	147	112	1,997	70	302	12,424
3-Person Household	13,651	5,851	352	268	854	893	158	76	332	87	96	4,684
4- or More Person Household	18,076	5,174	478	319	1,907	1,478	131	156	907	99	349	7,078

Source: US Census Bureau 2022 5-Year ACS, Table S2504.

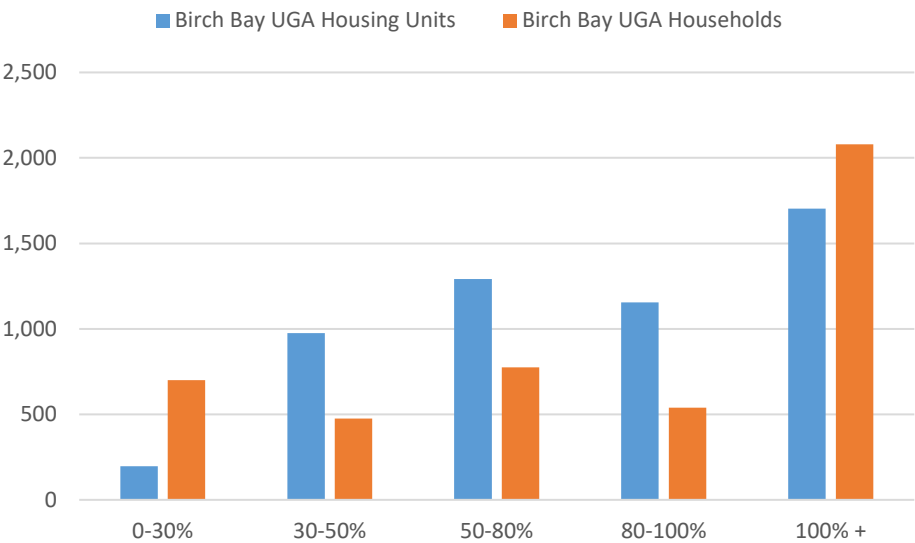
The charts below show a comparison of existing housing units and households at each income band for each UGA, based on data from the Department of Commerce's Housing for All Planning Tool (HAPT) for existing units, and data from HUD's Comprehensive Housing Affordability Strategy (CHAS) for existing households. This data shows the gaps in housing at each income band, and informed the HAPT's calculations of needed housing at each income level shown further below.

Figure 53. Bellingham Existing (2023) Housing Units and Households by Income Band



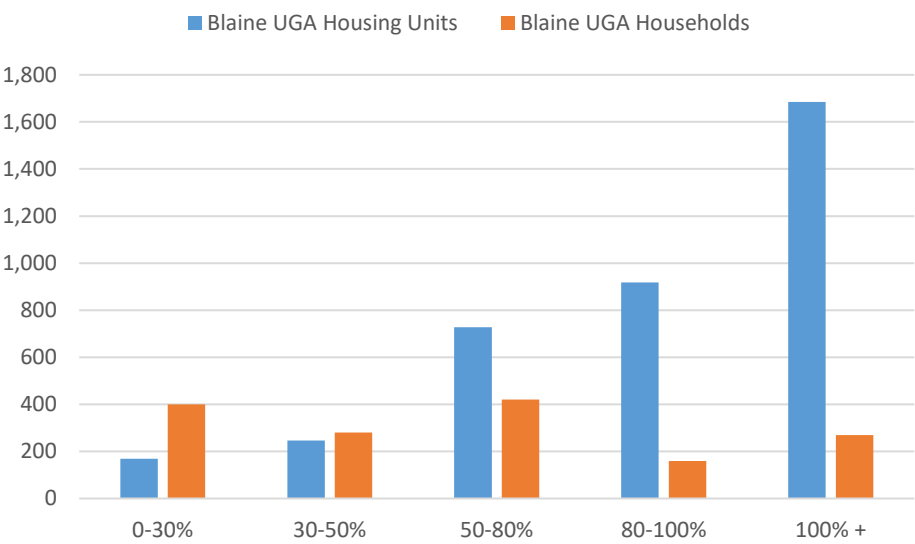
Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 54. Birch Bay Existing (2023) Housing Units and Households by Income Band



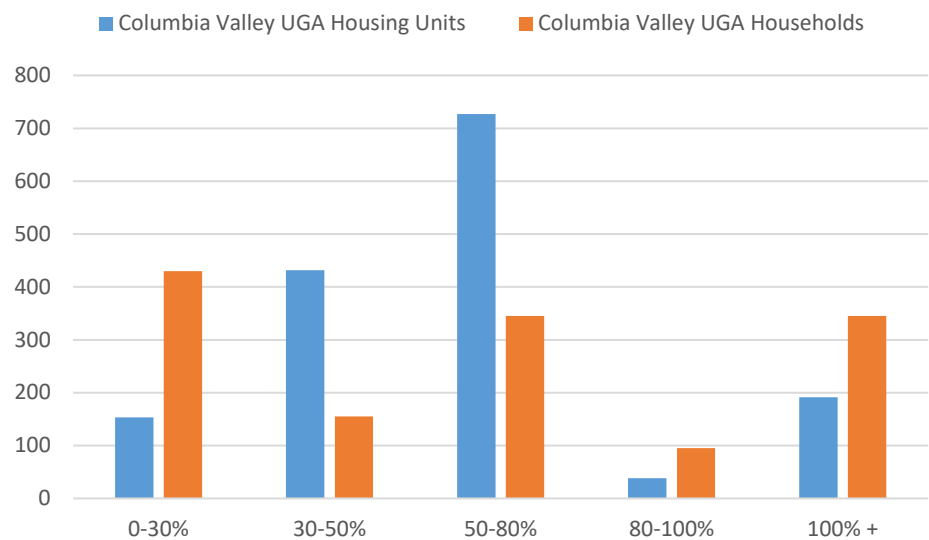
Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 55. Blaine Existing (2023) Housing Units and Households by Income Band



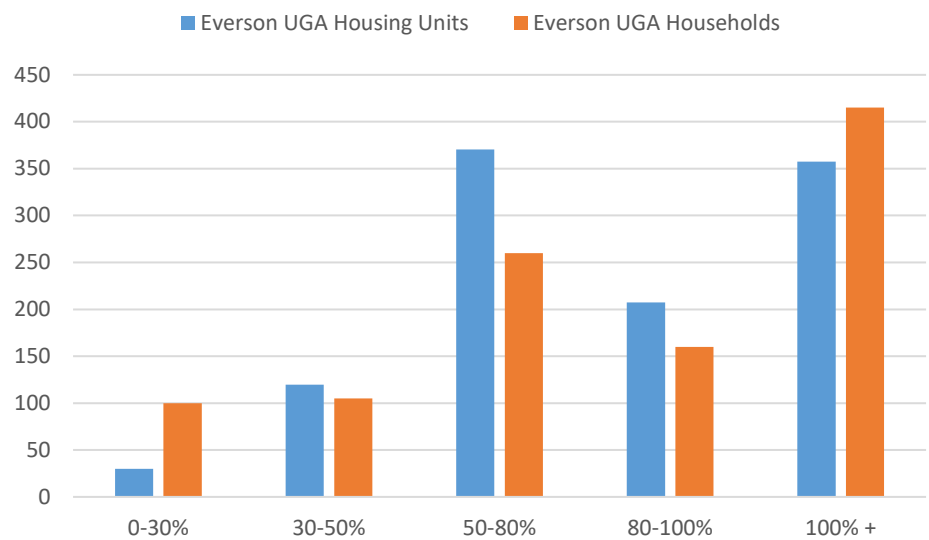
Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 56. Columbia Valley Existing (2023) Housing Units and Households by Income Band



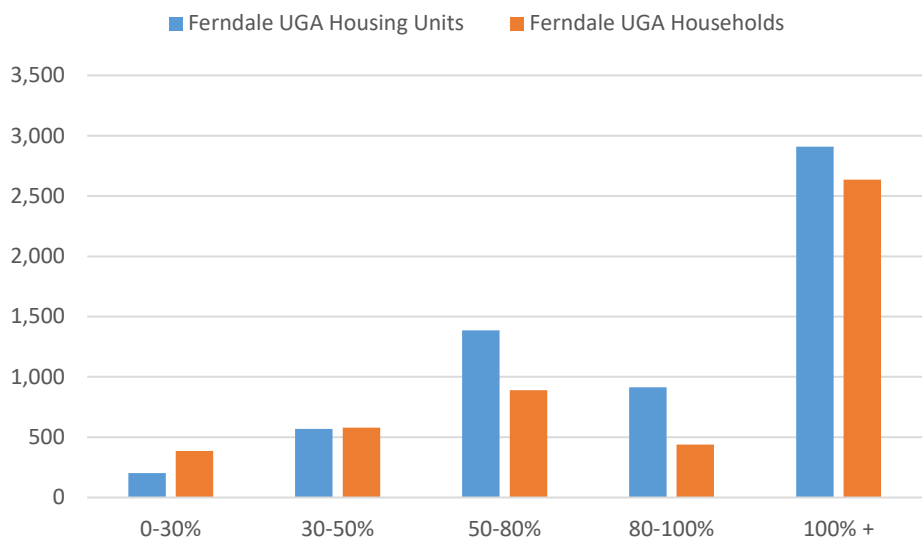
Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 57. Everson Existing (2023) Housing Units and Households by Income Band



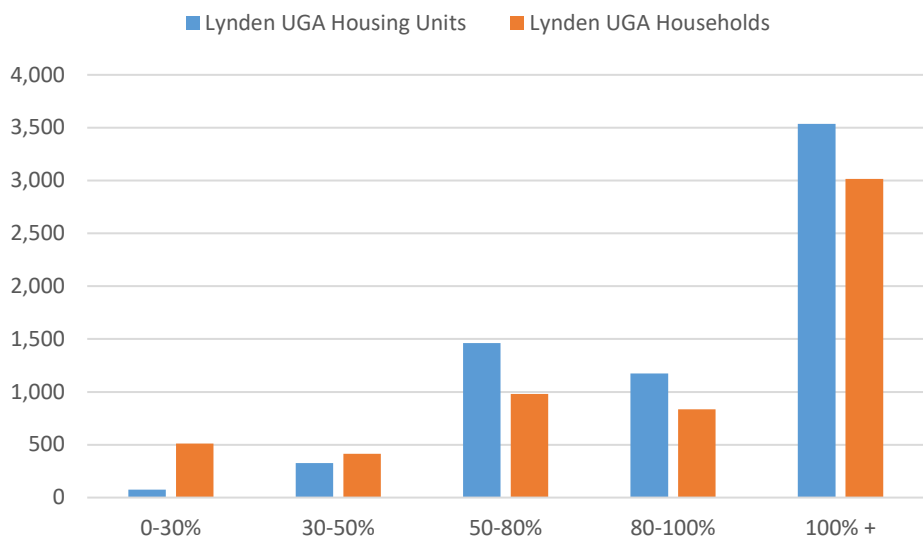
Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 58. Ferndale Existing (2023) Housing Units and Households by Income Band



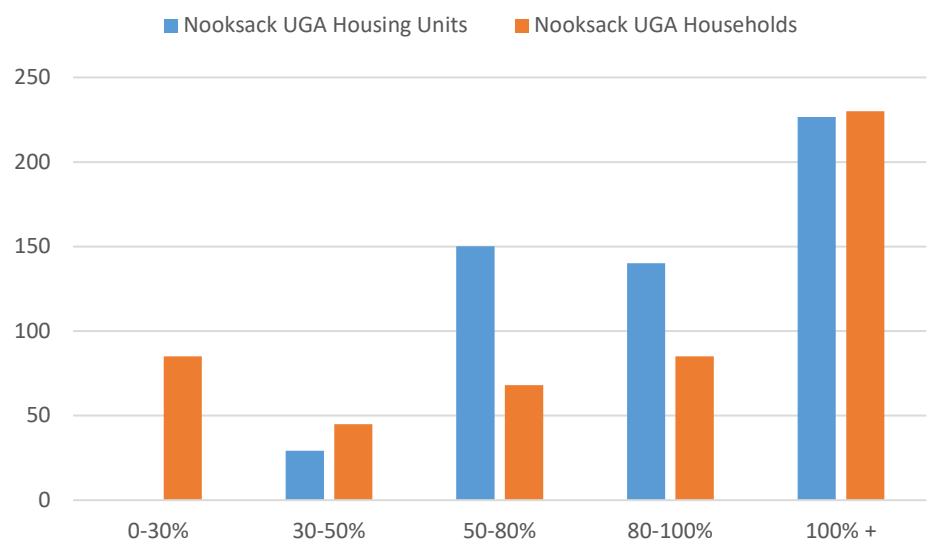
Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 59. Lynden Existing (2023) Housing Units and Households by Income Band



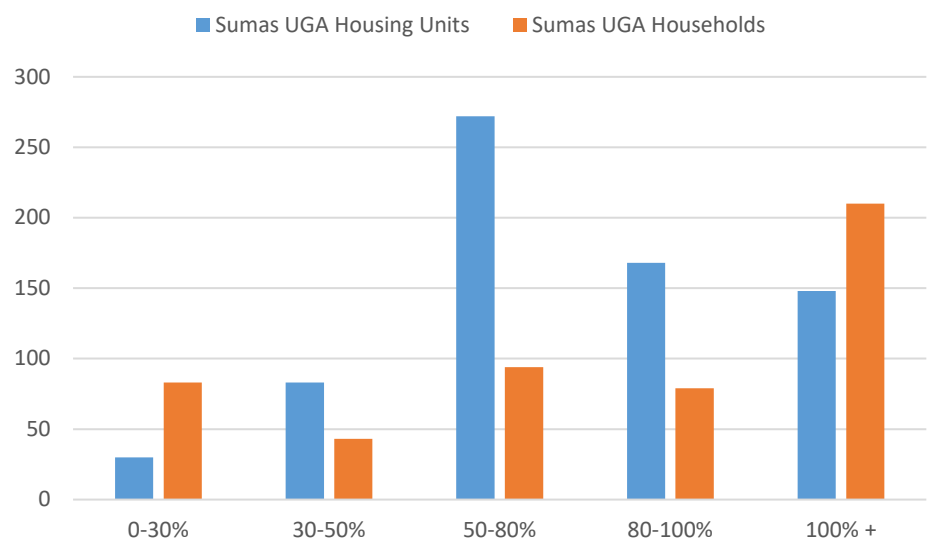
Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 60. Nooksack Existing (2023) Housing Units and Households by Income Band



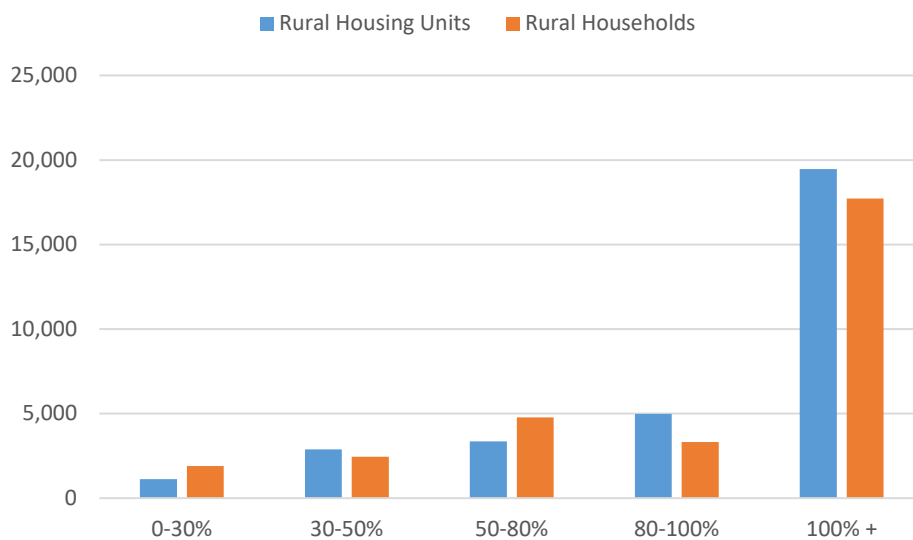
Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 61. Sumas Existing (2023) Housing Units and Households by Income Band



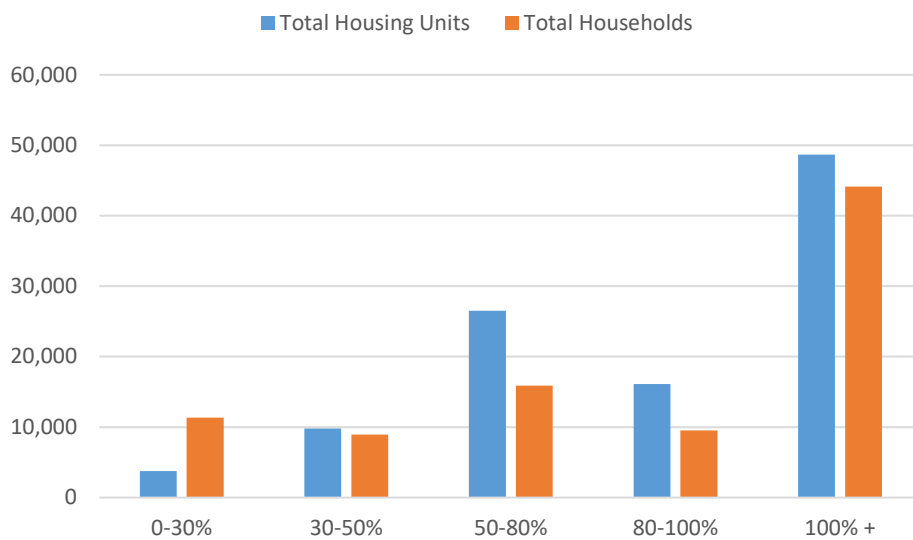
Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 62. Rural Existing (2023) Housing Units and Households by Income Band



Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

Figure 63. Total Whatcom County Existing (2023) Housing Units and Households by Income Band



Source: WA Department of Commerce, Whatcom County, HUD Comprehensive Housing Affordability Strategy (CHAS), Leland Consulting Group.

The chart below shows future housing need by income band (shown as a percentage of Area Median Income) for Whatcom County by UGA, and areas outside UGAs. The countywide total needs were determined based on the selected population target put forth by the County and cities, input into the Department of Commerce’s Housing for All Planning Tool (HAPT), which considers a number of factors including current income distribution, current cost-burden, current and projected future homelessness,

and optimal future vacancy rates to determine the breakdown of needed unit capacity by income band. The countywide totals generated by the HAPT were then allocated by UGA, and to the area outside of UGAs, based on the expected percentage of countywide growth in each UGA, and in the area outside of UGAs, within the range of the OFM medium to Leland Consulting Group adjusted high population forecasts set forth in Leland Consulting Group's May 22, 2024 "Population and Employment: Growth Projections and Preliminary Allocations" Technical Report, as selected by each city based on their expected growth trajectories and based on modifications by the County Council in March 2026. The county and cities are then responsible for showing sufficient land capacity by income band for the targets shown in Figure 64, as described further below under "Land Capacity Analysis."

Figure 64. Whatcom County Housing Unit Targets by Income Band, 2023-2045

	% of Total	Total	0-30%		>30- 50%	>50- 80%	>80- 100%	>100- 120%	>120%	Emergency Housing Needs
			Non- PSH	PSH						
Bellingham City & UGA	52.20%	18,390	4,978	1,944	4,158	1,197	989	1,400	3,725	299
Birch Bay UGA	3.25%	1,146	244	103	216	68	136	165	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	10.24%	3,606	0	0	0	731	145	141	2,589	45
Total	100.00%	35,229	8,472	3,325	7,101	2,788	1,923	2,631	8,989	559

Land Capacity Analysis

As noted above, each UGA must show land capacity to meet the housing unit targets by income band shown above in Figure 64. In cases where jurisdictions cannot show sufficient capacity to meet their targets, land use changes or UGA expansions will need to be adopted concurrently with jurisdictions' comprehensive plans to show sufficient capacity to meet the housing targets.

Land capacity for each UGA was calculated using the Land Capacity Analysis Spreadsheets and the *Whatcom County Land Capacity Analysis For Permanent Housing and Employment Needs Methodology*, except for Bellingham, which used its own internal spreadsheets. The land capacity results are shown below.

Bellingham City & UGA

Bellingham City & UGA Permanent Housing

The future land use assumptions incorporated into the LCA include continued emphasis on strategies proven to be successful and sustainable from previous planning cycles based on the results of the Buildable Lands Report. They also include new changes required by recent state housing legislation. These future assumptions include:

- Continued reliance on mixed use urban villages to accommodate about 1/3 of all future housing and employment growth. These areas have been accommodating this portion of growth for the past 10-15 years and are anticipated to continue to do so through the next 20-years. Urban villages represent about 30-40% of Bellingham's growth capacity on about 4% of the city's total land area. They accommodate growth in a sustainable manner near high-frequency transit, with a mix of employment, service options, and housing affordable to a variety of incomes. The 2025 update includes a newly adopted plan for the Barkley Urban Village with a total capacity of about 3,000 housing units.
- Reconfiguration of residential single zones that currently restrict use to single detached housing. These zones will be renamed "Residential Low" and will allow single-detached housing as well as at least six of the nine middle housing forms identified by HB 1110. These zones will also allow up to four housing units per lot or six with affordability or proximity to high-frequency transit (as per HB 1110). A uniform citywide minimum density (maximum lot size) will also be established to ensure citywide consistency and equity and make the best use of Bellingham's limited supply of buildable land. Each lot allowed by the uniform density will also allow the 4-6 housing units indicated above.
- Reconfiguration of residential multi medium and high zones. These two zones will be renamed "Residential Medium" and "Residential High" dropping the "multi" language in acknowledgement of the city's move away from the binary "single/multi" paradigm. The medium zone will allow limited residential single, and at least six of the nine middle housing forms, and will retain a uniform minimum density. The high zone will allow multi-unit attached housing, and will retain a uniform minimum density. The high zone does not have an upper density limit.

- Changes to residential zoning within the Lake Whatcom Watershed to a new “Residential Watershed” zone. This zone will prioritize limits on development in favor of water quality protection for the watershed which is Bellingham’s municipal water supply.

Bellingham City & UGA Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/ Deficit
0-30 Non PSH	4,978	12,277	5,772	6,505	6,533	28
0-30 PSH	1,944					
30-50	4,158					
50-80	1,197					
80-100	989	2,389	773	1,616	1,970	354
100-120	1,400					
120+	3,725	3,725	953	2,772	2,889	117
Total	18,391	18,391	7,499	10,892	11,392	499

Note: Total Additional Land Capacity does not include Pending Units

Bellingham City & UGA Emergency Housing

Bellingham Emergency Housing Capacity by Zone

Zone	Net Developable Acres	Beds / Acre	Emergency Housing Bed Capacity
Residential Low	138	5	692
Residential Medium	72	25	1,812
Residential High	33	40	1,335
Commercial	32	40	1,288
Industrial	370	25	9,242
Institutional	1	40	51
Urban Village	123	40	4,902
Public	0	0	0
Other mixed zones	7	25	173
Residential Watershed	7	0	0
Airport Operations	1	0	0
Religious Institutions (Gross Acres)	0	4	0
Subtotal	785	25	19,495
Pending			0
TOTAL			19,495

Bellingham Emergency Housing Capacity

Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit	Acres Needed
299	19,495	19,196	12.04

Birch Bay UGA

Birch Bay UGA Permanent Housing

The results below reflect a zoning code amendment to allow duplex, triplex, and fourplex development in the Urban Residential 4 dwellings/acre (UR-4) zone.

Birch Bay UGA Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/ Deficit
0-30 Non-PSH	244	563	0	563	644	81
0-30 PSH	103					
30-50	216					
50-80	68	68	0	68	77	9
80-100	137	302	297	5	128	123
100-120	165					
120+	213	213	301	-88	910	998
Total	1,146	1,146	598	548	1,759	1,211

Note: Total Additional Land Capacity does not include Pending Units

Birch Bay UGA Emergency Housing

Although there is larger theoretical capacity for emergency beds, Whatcom County Code 20.17.040 states " . . . the aggregate total of people in all temporary homeless facilities shall not exceed 100" in unincorporated areas. For purposes of this analysis, 40 of those 100 beds have been allocated to the Birch Bay UGA.

Birch Bay Emergency Housing Capacity by Zone

Zone	Net Developable Residential Acres	Beds / Acre	Emergency Housing Bed Capacity
UR4	152.0	22	3,311
URM6	72.3	22	1,576
URM24	21.2	22	462
RC	33.4	22	728
GC	18.2	22	396
NC	0.0	22	0
Subtotal	297.1		6,473
Pending			0
TOTAL			6,473

Birch Bay Emergency Housing Capacity

Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit	Acres Needed
17	40	23	0.78

Blaine City & UGA

Blaine City & UGA Permanent Housing

All housing can be accommodated with existing city zoning. Please note that no housing growth is included in the area to be de-annexed by the city. The county could consider attributing some modest growth to this area, assuming it’s removed from Blaine’s UGA, as recommended by the Whatcom County Planning Commission and the City of Blaine.

Blaine City & UGA Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/ Deficit
0-30 Non PSH	480	1,184	246	938	954	16
0-30 PSH	188					
30-50	401					
50-80	115					
80-100	95	230	32	198	399	201
100-120	135					
120+	359	359	547	-188	582	770
Total	1,773	1,773	825	948	1,935	987

Note: Total Additional Land Capacity does not include Pending Units

Blaine City & UGA Emergency Housing

Blaine Emergency Housing Capacity by Zone

Zone	Gross Vacant, Partially-Used, and Underutilized Acres	Critical Area Acreage on Vacant, Partially- Used, and Underutilized Parcels	Net Acres	Beds / Acre	Emergency Housing Bed Capacity
R/O	5.5	0.1	5.4	24	130
CB-M-60	0.3	0.3	0.0	60	2
CB-TP-60	2.0	1.0	1.0	60	62
CB-WV	0.0	0.0	0.0	23	0
CB-M-48	0.5	0.2	0.3	28	8
HCc	1.4	0.0	1.4	48	66
Subtotal	9.6	1.5	8.1		268
Pending					0
TOTAL					268

Blaine Emergency Housing Capacity

Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit
29	268	239

Columbia Valley UGA

Columbia Valley UGA Permanent Housing

The results below reflect a zoning code amendment to allow duplex, triplex, and fourplex development in the Urban Residential 4 dwellings/acre (UR-4) zone and rezoning some land in the UGA from UR-4 to Urban Residential Medium Density 6 dwellings/acre (URM-6).

Columbia Valley UGA Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/Deficit
0-30 Non PSH	95	233	0	233	391	158
0-30 PSH	46					
30-50	92					
50-80	33	33	0	33	41	8
80-100	27	65	0	65	74	9
100-120	38					
120+	102	102	36	66	369	303
Total	433	433	36	397	875	478

Note: Total Additional Land Capacity does not include Pending Units

Columbia Valley UGA Emergency Housing

Although there is larger theoretical capacity for emergency beds, Whatcom County Code 20.17.040 states " . . . the aggregate total of people in all temporary homeless facilities shall not exceed 100" in unincorporated areas. For purposes of this analysis, 15 of those 100 beds have been allocated to the Columbia Valley UGA.

Columbia Valley Emergency Housing Capacity by Zone

Zone	Net Developable Residential Acres	Beds / Acre	Emergency Housing Bed Capacity
UR4	95.1	22	2,072
URM6	55.1	22	1,201
GC	1.8	22	38
Religious Institutions (Gross Acres)		4	0
Subtotal	152.0		3,311
Pending			0
TOTAL			3,311

Columbia Valley Emergency Housing Capacity

Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit	Acres Needed
8	15	7	0.37

Everson City & UGA

Everson City & UGA Permanent Housing

To support the population projection allocation of 611 additional housing units from 2023-2045, Everson has revised development codes to accommodate higher density housing. In the past few years, the city has reduced the minimum lot size in the residential zones and implemented code language that allows planned unit developments to be created under a conditional use permit in the Residential Multiple-Use zone.

- 5 units per acre: SF in Res and RMU
- 10 units per acre: Duplex/MF in RMU
- PUDs must be on at least an acre. Flexibility in lot size, width, setbacks, etc. Overall density must comply with the minimum lot size for MF (4,250 sq ft per unit).

HB 1337, which creates new regulations for accessory dwelling units, will also bring increased density in all residential zones. In December 2025, the city implemented these new regulations into the Everson Municipal Code. In the past, Everson only allowed one ADU per residential lot as a permitted or conditional use. These new regulations now allow for two ADUs per residential lot as a permitted use. The city is also proposing to allow zero-lot line townhomes as a permitted use in the RMU zone instead of as a conditional use. This is to help eliminate barriers to building more affordable housing.

In addition to these ongoing code changes, the comprehensive plan update will allow the city to reevaluate the current development code and make changes to better support permanent and supportive housing and remove potential barriers to housing development.

The comprehensive plan update will also allow for rezoning properties to reflect appropriate densities. For example, all FEMA buy-out properties are proposed to being rezoned to agricultural from residential zoning. These properties are within the undevelopable floodway and are not appropriately zoned. To compensate for loss of residential land, the city is proposing to upzone several properties into the RMU zone to allow for higher densities in more appropriate areas.

Even with zoning and code changes, the city is unable to accommodate the projected 611 housing units without the proposed UGA expansion areas to the west, outside of the floodplain. Without the proposed expansions, the city's LCA shows an overall housing deficit of 51 units, including a deficit of 40 and 12 units in the low-income and middle-income brackets, respectively.

Everson is dedicated to supporting safe and affordable housing in a rapidly growing city. To achieve this, the city must focus on developing outside of the floodplain, rather than encouraging high density housing within flood prone areas.

Everson City & UGA Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/ Deficit
0-30 Non PSH	165	408	42	366	374	8
0-30 PSH	65					
30-50	138					
50-80	40					
80-100	33	79	28	51	72	21
100-120	46					
120+	124	124	104	20	21	1
Total	611	611	174	437	466	29

Note: Total Additional Land Capacity does not include Pending Units

Everson City & UGA Emergency Housing

Everson Emergency Housing Capacity by Zone

Zone	Net Developable Residential Acres	Beds / Acre	Emergency Housing Bed Capacity
Commercial	11.0	15	164
Religious Institutions (Gross Acres)	10.9	4	46
Subtotal	11.0		210

Everson Emergency Housing Capacity

Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit	Acres Needed
10	210	200	0.67

Ferndale City & UGA

Ferndale City & UGA Permanent Housing

We are proposing to rezone existing land within the City to:

- RS High Single family Dwelling (RSH)
- Residential Multifamily Medium (RMM)
- Residential Multifamily High (RMH)
- Light Industrial (LI)
- Manufacturing (M)
- General Business (GB)
- Mixed Use Commercial (MXD)

In the UGA we are proposing future zoning:

- RS High Single family Dwelling (RSH)
- Residential Multifamily Medium (RMM)
- Residential Multifamily High (RMH)
- General Business (GB)
- Mixed Use Commercial (MXD)
- Neighborhood Commercial (NC)

The neighborhood commercial zone is a new zone we created.

Ferndale City & UGA Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/ Deficit
0-30 Non PSH	1,261	3,109	611	2,498	2,740	242
0-30 PSH	492					
30-50	1,053					
50-80	303					
80-100	250	605	0	605	856	251
100-120	355					
120+	944	944	15	929	1,179	250
Total	4,658	4,658	626	4,032	4,775	743

Note: Total Additional Land Capacity does not include Pending Units

Ferndale City & UGA Emergency Housing

Ferndale Emergency Housing Capacity by Zone

Zone	Net Developable Residential Acres	Beds / Acre	Emergency Housing Bed Capacity
RS Low	109.4	5	547
RS Medium	67.3	7	471
RS High	57.1	9	514
RMM	159.7	20	3,193
RMH	33.6	20	671
RO	3.3	20	66
GB	0.0	20	0
MXD	84.8	20	1,697
CC	0.0	20	0
RR	0.0	20	0
UR	4.6	20	92
Religious Institutions (Gross Acres)		4	0
Subtotal	519.7	14	7,251

Ferndale Emergency Housing Capacity

Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit	Acres Needed
76	7,251	7,175	5.45

Lynden City & UGA

Lynden City & UGA Permanent Housing

Lynden has acted to increase housing density across the city in several ways. These changes allow for the construction of housing types which are more affordable than the traditional single-family detached housing. To maximize land capacity in newly developed areas the city pre-zoned sections of its Urban Growth Area with a zoning category created specifically for 'middle housing'. This category accommodates attached housing units on small lots with an increase height limit to allow for 3-story construction, facilitating the opportunity of a 'for sale' townhome product. To facilitate infill opportunities, Lynden revised its mixed-use zoning category to allow for the creation of housing without the need to construct a commercial component. Instead of a required commercial component, the revision allowed high density housing in focused areas around six existing commercial centers throughout the city (Ordinance 1657). When originally created the maximum density of the mixed-use code was set at 28 dwelling units per acre but based on conceptual housing designs, and with the need to increase affordable housing types such as stacked apartments, the City has adjusted the maximum density to 40 units per acre with the 2025 Comprehensive Plan update with an update . Simultaneously, Lynden adapted the mixed-use overlay to recognize that within the central core of the city, where lots were smaller, there was a desire to convert existing commercial structures to residential uses. To address this the City adopted a code for a small-scale mixed use which allows for the conversion of structures or new construction within the central city core (Ordinance 23-1669). Other changes to zoning include the adoption of new accessory dwelling unit (ADU) regulations to be consistent with State legislation. Regulations previously allowed at one ADU per single-family lot the revision allowed for two ADUs per lot (City of Lynden Ordinance 24-1683). The City also recognized that manufactured home communities within the city provided a source of affordable housing and the regulations one these communities were revised to allow for increased density as well as the potential densification of existing non-conforming manufactured home communities. Finally, an overarching code amendment made in 2025 eliminated the requirement for multi-family and commercial projects to seek design review approval through a Design Review Board. Instead, standards were written into code to eliminate subjective interpretation (City of Lynden Ordinance 25-1706).

Lynden City & UGA Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/ Deficit
0-30 Non-PSH	957	2,360	241	2,119	2,217	98
0-30 PSH	374					
30-50	799					
50-80	230					
80-100	190	459	140	319	1,207	888
100-120	269					
120+	716	716	75	641	732	91
Total	3,535	3,535	456	3,079	4,156	1,077

Note: Total Additional Land Capacity does not include Pending Units

Lynden City & UGA Emergency Housing

Lynden Emergency Housing Capacity by Zone

Zone	Net Acres	Beds / Acre	Emergency Housing Bed Capacity
RM3		24	
RM4		24	
HBD	0.2	24	5
CSL	15.5	24	369
CSR	36.7	24	876
Subtotal	52.4		1,250
Pending			0
TOTAL			1,250

Lynden Emergency Housing Capacity

Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit	Acres Needed
58	1,250	1,192	2.43

Nooksack City & UGA

Nooksack City & UGA Permanent Housing

The City of Nooksack's initial land capacity analysis results showed substantial housing unit deficits in the low-income and moderate-income bands based on the developable areas available within the existing City and UGA. Housing growth projections through 2045 by Income Band have been addressed through proposed revisions in zoning code to support higher density residential development (reduced minimum lot sizes for multifamily development, up-zoning of specific non-floodplain parcels to the higher-density R-8600 zone, and increased maximum building heights), the inclusion of PUDs to support developer's innovation (e.g. Townhomes, Cottage Clustering), the addition of multifamily and mixed use in Nooksack's Central Market District and Commercial Zones (including Residential over Commercial), and elimination of separation requirements between multifamily developments - as well as the addition of development code supporting construction of accessory dwelling units. Nooksack is also considering opportunities for increasing low income and permanently supportive housing by adding these as enumerated permitted or conditional uses in the residential district. These revisions support Nooksack in satisfying the requirements of state housing initiatives and new legislation.

Based on the City's updated land capacity analysis results for the existing City and UGA, incorporation of the above changes into the zoning code would fully address the housing unit deficit in the low-income band; however, a 26.5-unit deficit would remain in the moderate-income band. One action that was considered to address this remaining deficit was to increase densities within the undeveloped floodplain areas of the City, but this approach was rejected to avoid putting more people at risk from flooding. To address the remaining deficit in the moderate-income housing band, the City has proposed to expand the UGA through addition of a 20-acre area that is located close to the Nooksack Elementary School, outside the floodplain and not within designated resource lands. The proposed zoning changes and addition of the UGA expansion area close to the Elementary School are necessary to fully address the previously identified low- and moderate-income band housing unit deficits. The remaining surplus in the high-income band is driven primarily by the unusually large number of pending units in that income band, which exceeds the corresponding housing need allocation. These pending units are predominantly made up of housing that has been constructed during the first three years of the 22-year planning period, plus housing units that are currently under construction and remaining lots in these recently recorded subdivisions.

Nooksack City & UGA Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/Deficit
0-30 Non PSH	117.00	289.00	4.00	285.00	285.00	0.00
0-30 PSH	46.00					
30-50	98.00					
50-80	28.00					
80-100	23.00	56.00	0.00	56.00	56.50	0.50
100-120	33.00					
120+	88.00	88.00	121.00	-33.00	48.50	81.50
Total	433.00	433.00	125.00	308.00	390.00	82.00

Note: Total Additional Land Capacity does not include Pending Units

Nooksack City & UGA Emergency Housing

Nooksack Emergency Housing Capacity by Zone

Zone	Net Developable Residential Acres	Beds / Acre	Emergency Housing Bed Capacity
COM / CMD / LI <i>(w/Conditional Use)</i>	11.6	10	116
RESIDENTIAL Religious Institutions <i>(Gross Acres)</i>	4.0	4	16
Subtotal	15.6	8	132
Pending			0
TOTAL			132

Nooksack Emergency Housing Capacity

Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit	Acres Needed
89	132	43	8.90

Sumas City & UGA

Sumas City & UGA Permanent Housing

To increase densities within the existing City limits, the City of Sumas has made a number of changes to its zoning regulations. The City eliminated its Residential, Low Density zone and rezoned those properties to Residential, Medium Density, which allows for higher density development, including duplexes. The City also adopted an ordinance to allow construction of accessory dwelling units (ADUs) and removed barriers to construction of multifamily development in the Business, General zone. Our Residential, High Density zoning code regulations allow for all forms of housing which can accommodate all of the income brackets.

Even with these changes, the City Land Capacity Analysis still shows a deficit of 518 units in overall residential capacity in City Limits and the existing UGA. In the 0-80% AMI range, the City Land Capacity Analysis shows a deficit of 386 housing units. In the 120%+ AMI range, the City Land Capacity Analysis shows a deficit of 119 units, and a deficit of 13 units in the 80-120% AMI range.

To offset these deficits, the City has proposed an expansion of its UGA to the west of City Limits to gain access to developable areas outside the floodplain. The City previously considered, and ultimately rejected, options to further increase densities within City Limits, which would also increase densities in the FEMA 100-year floodplain. The table below shows the Land Capacity Analysis results with the proposed UGA added. These results show that the proposed UGA would provide a small surplus of 3 units in overall residential capacity.

Sumas City & UGA Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/ Deficit
0-30 Non PSH	174	429	2	427	428	1
0-30 PSH	68					
30-50	145					
50-80	42					
80-100	35	84	23	61	61	0
100-120	49					
120+	130	130	6	124	126	2
Total	643	643	31	612	615	3

Note: Total Additional Land Capacity does not include Pending Units

Sumas City & UGA Emergency Housing

Sumas Emergency Housing Capacity by Zone

Zone	Net Developable Residential Acres	Beds / Acre	Emergency Housing Bed Capacity
Business General	5.9	10	59
Religious Institutions (Gross Acres)			0
Subtotal	5.9		59

Sumas Emergency Housing Capacity

Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit	Acres Needed
10	59	49	1.00

Rural and Resource Lands

Rural and Resource Lands Permanent Housing

Rural and Resource Lands Land Capacity by Income Band, 2023-2045

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Additional Land Capacity*	Surplus/ Deficit
0-30 Non PSH	0	0	0	0	0	0
0-30 PSH	0					
30-50	0					
50-80	731	731	0	731	736	5
80-100	145	286	0	286	286	0
100-120	141					
120+	2,589	2,589	0	2,589	5,016	2,427
Total	3,606	3,606	0	3,606	6,038	2,432

Note: Total Additional Land Capacity does not include Pending Units

Rural and Resource Lands Emergency Housing

Although there is larger theoretical capacity for emergency beds, Whatcom County Code 20.17.040 states " . . . the aggregate total of people in all temporary homeless facilities shall not exceed 100" in unincorporated areas. For purposes of this analysis, 45 of those 100 beds have been allocated to Rural and Resource Lands.

Rural & Resource Lands Emergency Housing Capacity by Zone

Zone	Net Developable Residential Acres	Beds / Acre	Emergency Housing Bed Capacity
			0
Religious Institutions (<i>Gross Acres</i>)	114.0	4.19	478
Subtotal	0.0		478
Pending			0
TOTAL			478

Rural & Resource Lands Emergency Housing Capacity

Total Emergency Housing Need (Beds)	Total Emergency Housing Capacity (Beds)	Surplus/ Deficit	Acres Needed
45	45	0	10.74

Appendix A: Department of Commerce Housing Needs Analysis Checklist

The chart below documents how the *Whatcom County Comprehensive Plan Housing Needs Analysis* (Leland Consulting Group, 2025) satisfies the GMA Housing Element requirements from Exhibit 2 from the State Department of Commerce’s *Guidance for Updating Your Housing Element* (August 2023, Exhibit 2).

[illegible]

	Required / Recommended	Section / Figure / Page
Household Sizes		Figure 14, p. 16, Figure 15, p. 16
Household Types		
Household Tenure	Requirement	Figure 13, p. 15
Overcrowding Estimates		Figure 16, p. 17
Household Income & Cost Burden	Requirement	Figure 17, p. 18, Figure 18, p. 18, Figure 19, p. 19, Figure 20, p. 20, Figure 21, p. 20
Displacement Risk		Figure 22, p. 21, Figure 23, p. 23
Special Housing Needs		
Groups with Special Housing Needs	Recommendation	Figure 10, p. 12, Figure 25, p. 25, Figure 26, p. 26
Individuals / Families Experiencing Homelessness	Recommendation	Figure 27, p. 27, Figure 49, p. 43
Workforce Profile		
Local Workforce Characteristics		Local Workforce Characteristics, p. 27

	Required / Recommended	Section / Figure / Page
Jobs to Housing Ratio	Recommendation	Jobs to Housing Ratio, p. 33
Employment Trends & Projections	Recommendation	Employment Trends & Projections, p. 34
Housing Supply		
General Housing Inventory		
Unit Count by Type	Requirement	Figure 38, p. 36, Figure 39, p. 37
Size (Bedrooms)	Requirement	Figure 51, p. 46
Housing Market Conditions		
Housing development trends		Housing Market Conditions, p. 37
Sales Prices	Recommendation	Figure 44, p. 40
Rental Rates	Recommendation	Figure 43, p. 41
Vacancy Rate		Figure 42, p. 40
Housing Condition		Figure 46, p. 42
Housing Production		Figure 40, p. 38, Figure 41, p. 39
Housing Affordability	Recommendation	Gap Analysis, p. 44
Special Housing Inventory		
Subsidized / Public Housing Units	Requirement	Figure 47, p. 42
Group Homes / Care Facilities	Requirement	Figure 48, p. 43
Housing for Homeless Individuals	Recommendation	Figure 48, p. 43
Gap Analysis		
Quantity of housing units available to various income brackets	Requirement	Gap Analysis, p. 44, Land Capacity Analysis, p. 52

	Required / Recommended	Section / Figure / Page
Alignment of household size to housing unit sizes	Recommendation	Figure 52, p. 44
Units needed for special demographic groups	Recommendation	Figure 64, p. 51
Projection of future housing demand	Requirement	Figure 64, p. 51
Land Capacity Analysis		
Land available to meet housing unit demand	Requirement	Land Capacity Analysis, p. 52
Land available to meet special housing needs	Recommendation	Land Capacity Analysis, p. 52