

Urban Growth Area Review

City of Bellingham UGA / UGA Reserve Proposal

September 15, 2025

I. Introduction

The Growth Management Act (GMA) requires each county to designate urban growth areas (UGAs) within which urban growth will be encouraged (RCW 36.70A.110(1)). GMA planning goal 11 requires coordination between jurisdictions in the comprehensive planning process (RCW 36.70A.020(11)). Additionally, the GMA indicates that county and city comprehensive plans must be coordinated and consistent when they share common borders or related regional issues (RCW 36.70A.100). Therefore, Whatcom County and the cities have undertaken a joint planning process to allocate population, housing and employment growth, review permitted densities, and review UGA boundaries. The joint planning process includes a number of steps, including:

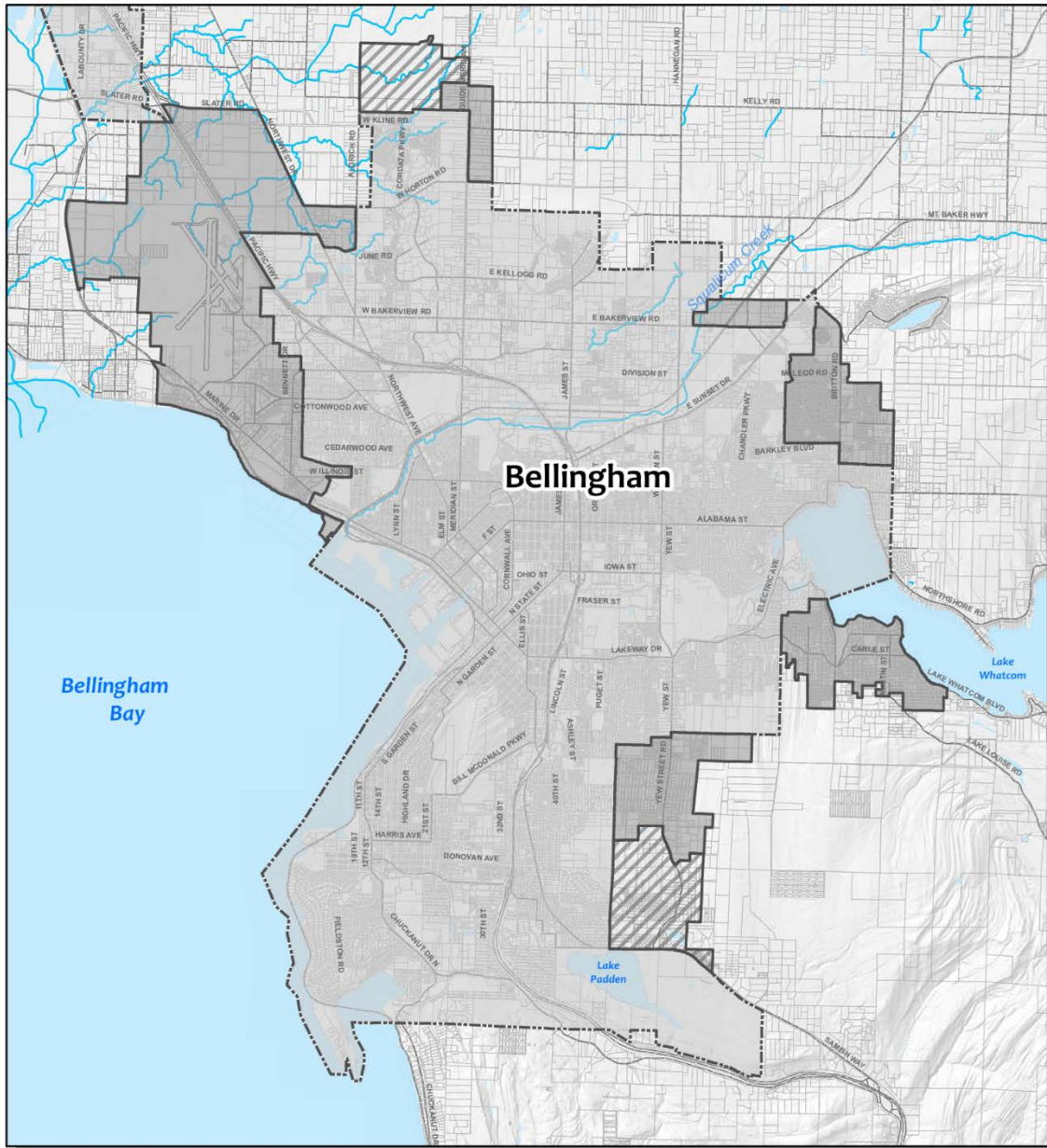
- Approval of interlocal agreements (2022).
- Preliminary County and city UGA population and employment proposals (2024).
- County Planning Commission review of preliminary city and County population and employment growth proposals (2024).
- County and city approval of non-binding multi-jurisdictional resolutions regarding preliminary population, housing and employment allocations (2025). See Whatcom County Council Resolution 2025-011.
- Draft Environmental Impact Statement (2025).
- Final Environmental Impact Statement (2025).
- City and County UGA boundary proposals (2025).
- County Planning Commission review (2025).
- County Council and City Council approval of comprehensive plans (2025-26).

UGAs must include areas and densities sufficient to accommodate the projected urban growth for the 20-year planning period (RCW 36.70A.130(3)), which extends through 2045. However, cities and the County are not required to plan for the future based solely upon past trends. Local government goals and policies, public input, new GMA requirements to plan for and accommodate housing for all economic segments of the community, infrastructure availability, capital facility planning, land capacity, and other factors are also taken into consideration.

Existing interlocal agreements indicate that the County and cities will work together to develop proposed population and employment allocations to UGAs and review UGA boundaries. The County and cities are recommending UGA boundary proposals for their respective UGAs. Review of these proposals includes opportunities for public comments and County Planning Commission recommendations. Final growth allocations and UGA boundaries will be adopted by the County Council in the Comprehensive Plan update in 2025 or 2026.

II. City Profile

The City of Bellingham is Whatcom County's largest urban area with a 2025 population estimated at 98,340 with another 8,500 people living in the unincorporated urban growth area (UGA). The existing city limits and UGA cover about 22,989 acres or about 36 square miles land area. Bellingham is a regional transportation hub served by Interstate 5, three state highways, freight and passenger rail, the Bellingham International Airport, and marine shipping, fishing, and ferry services on Bellingham Bay. The city is home to Western Washington University, Whatcom Community College, and Bellingham Technical College as well as the PeaceHealth hospital campus. Bellingham is bordered on the south by Chuckanut Mountain a westerly extension of the Cascade foothills, on the east by Lake Whatcom which is also the city's municipal water source, and on the west by Bellingham Bay. From its original 1904 incorporation boundaries the city has expanded primarily north through a series of annexations. Over the past 15 years expansion has slowed as growth has been focused into more sustainable infill in seven mixed-use urban village areas, and in residential multi zones located close to transit, parks and trails, and urban services.



- Bellingham Urban Growth Area

-  City of Bellingham
-  Urban Growth Area
-  Urban Growth Area Reserve

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III. Review of Permitted Densities

The GMA, at RCW 36.70A.130(3)(a), requires that:

Each county that designates urban growth areas under RCW 36.70A.110 shall review . . . its designated urban growth area or areas, patterns of development occurring within the urban growth area or areas, and the densities permitted within both the incorporated and unincorporated portions of each urban growth area. In conjunction with this review by the county, each city located within an urban growth area shall review the densities permitted within its boundaries, and the extent to which the urban growth occurring within the county has located within each city and the unincorporated portions of the urban growth areas.

Zoning districts and permitted densities in the city and the portion of the UGA within unincorporated Whatcom County are shown below.

<i>Table 1. Permitted Densities in the City</i>		
Zoning Abbreviation	Zoning	Permitted Densities
RS	Residential Single	0.5 to 12.1 units per acre
RM	Residential Multi	6.0 units per acre minimum for RM Low to 12.1 units per acre minimum for RM High, unlimited maximum density for RM High
UV	Urban Village	Floor area ratios (FARs) vary from core to transition areas. Typical achieved residential densities range from 12 to 100 units per acre. Some areas allowed unlimited height.
C	Commercial	Most commercial areas allow residential multi development in connection with commercial uses. Achieved residential densities vary
IN	Institutional	Educational and Medical campus areas, often with adopted institutional master plans. Residential uses like dormitories usually take residential multi forms with typical densities of 50 to 100 units per acre
I	Industrial	No residential uses allowed
P	Public	Primarily city and school district land without residential uses

Table 2. Permitted Densities in the UGA (outside the City)		
Zoning Abbreviation	Zoning	Permitted Densities
AO	Airport Operations	Hotels and motels shall not exceed a floor area ratio (FAR) of .60
GC	General Commercial	Hotels and motels shall not exceed a floor area ratio of .60 Duplexes and multifamily dwellings not to exceed 18 units per gross acre (when public water and sewer are available) Residences on premises in a commercial structure: The overall residential density will not exceed 12 units per acre
HII	Heavy Impact Industrial	N/A
LII	Light Impact Industrial	N/A
ROS	Recreation and Open Space	N/A
UR	Urban Residential	1 dwelling/10 acres (without public water and sewer). When in the Lake Whatcom Watershed, 1 dwelling/5 acres if public water and sewer are available
UR3	Urban Residential	Maximum gross density: 3 dwellings/acre, if public water and sewer are available 1 dwelling/10 acres, if public water and sewer are not available
UR4	Urban Residential	Maximum gross density: 4 dwelling units/1 acre, if public water and sewer are available Minimum net density: 4 dwelling units/1 acre, if public water and sewer are available 1 dwelling/10 acres, if public water sewer are not available
UR6	Urban Residential	Maximum gross density: 6 dwelling units/1 acre and minimum net density: 6 dwelling units/1 acre, if public water and sewer are available

		1 dwelling/10 acres, if public water and sewer are not available
URM18	Urban Residential Medium Density	Maximum gross density: 18 dwelling units/acre and minimum net density: 8 dwelling units/acre, if public water and sewer are available 1 dwelling/10 acres, if public water and sewer are not available
URMX	Urban Residential Mixed	Maximum gross density: 10 dwelling units/acre and minimum net density: 6 dwelling units/acre, if public water and sewer are available 1 dwelling/10 acres, if public water and sewer are not available
URMX6-10	Urban Residential Mixed	Maximum gross density: 10 dwelling units/acre and minimum net density: 6 dwelling units/acre, if public water and sewer are available 1 dwelling/10 acres, if public water and sewer are not available
URMX6-12	Urban Residential Mixed	Maximum gross density: 12 dwelling units/acre and minimum net density: 6 dwelling units/acre, if public water and sewer are available 1 dwelling/10 acres, if public water and sewer are not available

IV. UGA Growth Allocation Proposal

This section of the proposal compares population and employment growth allocations in the 2025 City proposal to those in the non-binding multi-jurisdictional resolutions approved by the County and all cities in 2025.

Bellingham's growth proposal matches the population, housing, and employment totals in the non-binding multi-jurisdictional resolution WCR 2025-011.

Table 3. UGA Population Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	30,310
2	City Growth Allocation Proposal	30,310
3	Difference	0

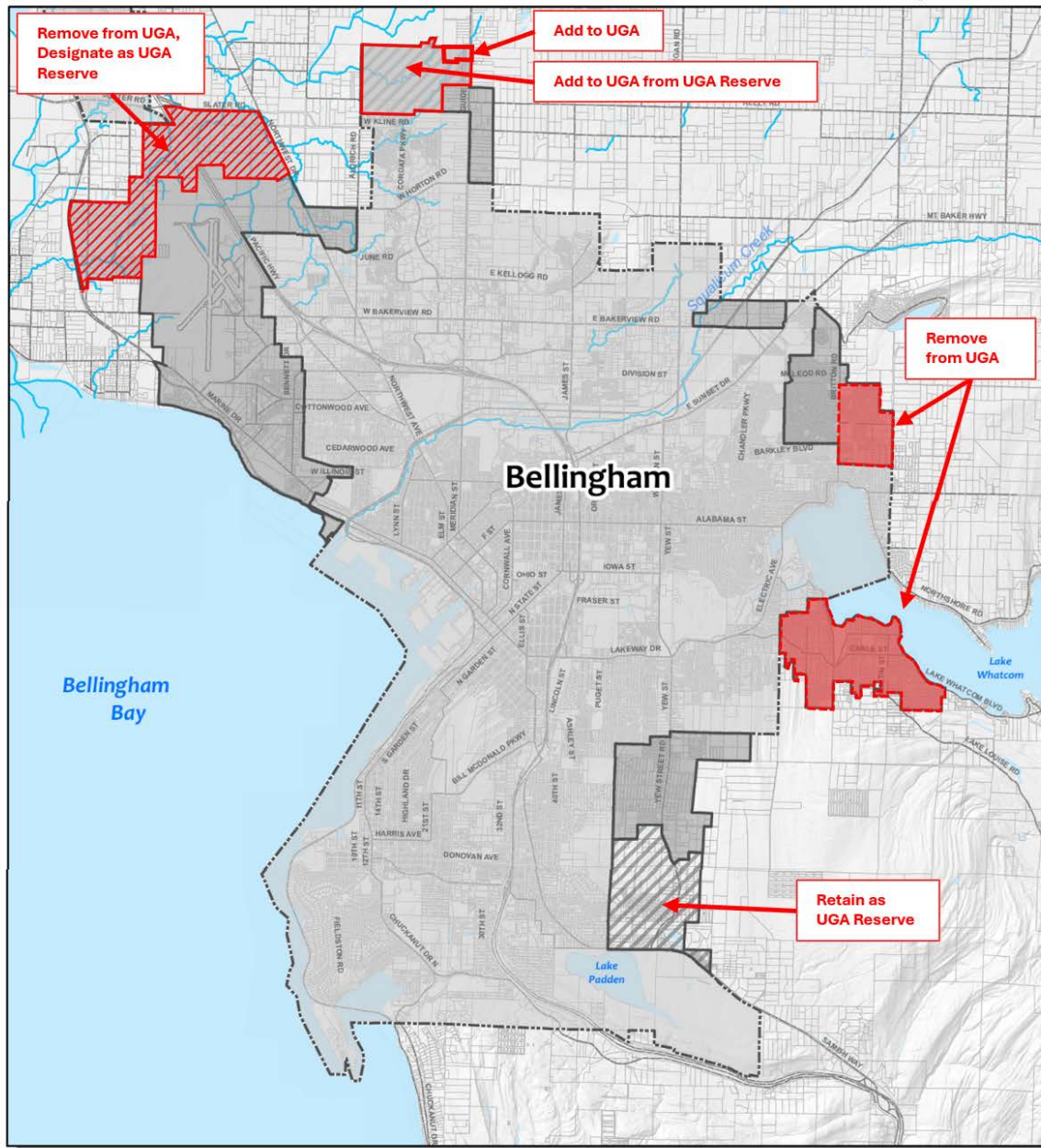
Table 4. UGA Housing Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	18,390
2	City Growth Allocation Proposal	18,390
3	Difference	0

Table 5. UGA Employment Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	19,384
2	City Growth Allocation Proposal	19,384
3	Difference	0

V. UGA / UGA Reserve Boundary Proposal

Responsive to its growth strategy and anticipated growth needs, Bellingham proposes a reconfigured UGA including the following.

- Removal of residential UGA areas within the Lake Whatcom Watershed recognizing their prioritization for protection of Bellingham's municipal water source.
- Removal of industrial and commercial UGA areas west and north of the Bellingham International Airport that are highly impacted by wetlands and streams, are largely in state, tribal, or port ownership, and are unlikely to be annexed to Bellingham within the 2025-2045 planning period. These areas are proposed for UGA Reserve status for potential consideration in future planning cycles.
- Expanding the UGA to include the North Bellingham UGA Reserve area and adjacent tax parcels south of West Larson Road into the UGA. The majority of this area is under control of a single owner that has expressed a strong interest in developing a significant amount of housing during the planning period including a mix of middle and multi-unit housing in forms aimed at the ownership market.
- Retaining the South Yew Street UGA Reserve area for consideration in a future plan update.



- Bellingham Proposed Urban Growth Area

-  City of Bellingham
-  Urban Growth Area
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VI. Land Capacity Analysis Overview

A land capacity analysis compares the proposed growth allocations to the capacity of the UGA to accommodate growth. The land capacity analysis is an important tool for sizing UGAs. Land capacity analysis results for the 2025 City Proposal, based upon proposed UGA densities and boundaries, are shown below.

Table 6. Proposed UGA - Population Land Capacity Analysis Results		
1	Population Growth Capacity of Proposed UGA	33,619
2	Population Growth Allocation Proposed	30,310
3	Surplus (Deficit)	3,309

Bellingham's population estimate assumes a housing vacancy rate of 6% by 2045, and that ADUs have a 25% vacancy rate and a household size that is 50% of that for single detached primary units.

Table 7. Proposed UGA – Housing Land Capacity Analysis Results

Income Band (AMI)	Aggregated Housing Needs	Total Capacity of Proposed UGA	Surplus (Deficit)
0-80%	12,277	12,306	29
80-120%	2,389	2,779	390
120+ %	3,725	3,807	82
Total	18,390	18,892	501

NOTE: AMI means "Area Median Income"

The results of the land capacity analysis show that the proposed UGA boundary and land use regulatory changes will increase the estimated land capacity for housing to meet the projected growth for the 2025-2045 planning period. These changes will create capacity for the housing forms needed to meet the housing by income range allocation for Bellingham. However, the financial and organizational (public and non-profit) resources to fully meet the rental subsidy and human service needs for the 0-30%, 30-50%, and 50-80% AMI housing allocation are not currently present in our community. Most of Bellingham's existing market rate rental housing rents in the 50-80% AMI income range. Without significant additional public and non-profit subsidy, new rental housing built during the planning period will also likely rent in this income range resulting in an over-supply of 50-80% housing and an acute lack

of 0-50% AMI housing (and permanent supportive housing). The existing financial and organizational resources will fall short or exceed projected needs by the following estimated amounts:

0-30% AMI Housing = 3,254 unit shortfall (35% of need met)
0-30% AMI PSH* = 1,690 unit shortfall (13% of need met)
30-50% AMI Housing = 1,206 unit shortfall (71% of need met)
50-80% AMI Housing = 6,179 unit surplus (616% of need met)

*PSH is Permanent Supportive Housing (onsite specialized services)

Currently, Bellingham uses federal HUD block grant and HOME investment partnership funds, local housing levy and sales tax funds, and other sources totaling about \$14 million each year for:

- Production of permanently affordable rental housing
- Renter and homebuyer downpayment assistance
- Preservation of housing through home rehabilitation loans
- Provision of supportive human services

The funds directed to production of affordable housing are leveraged and extended at about a 1:8 ratio through partnerships with local non-profit developers.

Bellingham also provides a broad range of incentives to developers of affordable housing including:

- Density bonuses
- Reduced impact fees
- Reduced utility system development charges
- Multi-family tax exemption program
- Opportunity zones
- Expedited project and permit review

To meet the projected housing by income need and overcome the shortfalls identified above, more financial and non-profit organizational resources will be required. These additional resources would allow subsidies to push the market-rate housing built in the 50-80% AMI range down to rental and/or ownership rates affordable to households with incomes in the 0-30% and 30-50% AMI range.

The two figures below illustrate the likely distribution of future housing by income given existing financial and organizational resources (Figure 1), and the distribution of future housing by income possible if sufficient additional resources were available.

Figure 1

Housing Capacity by Income (with existing resources)

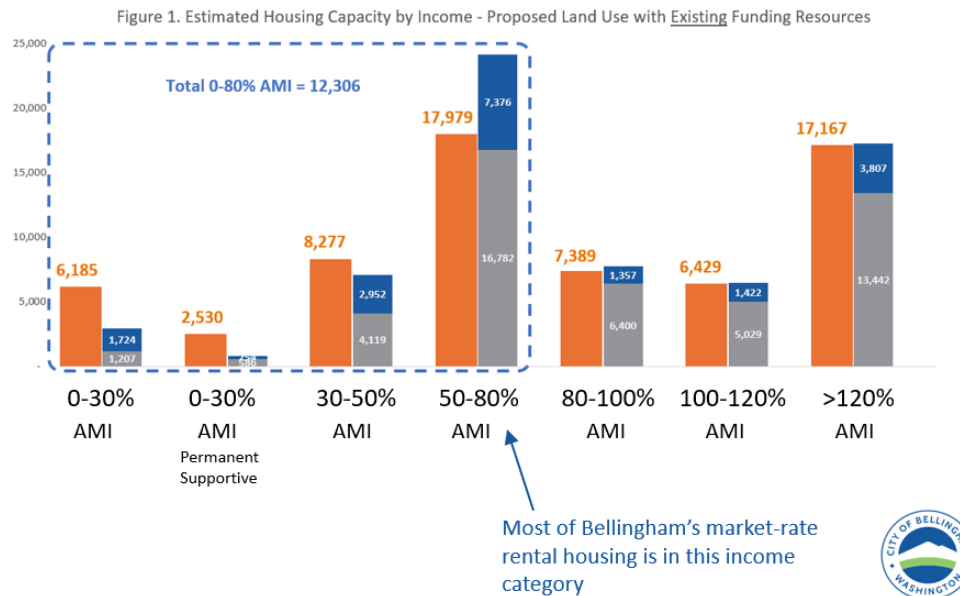


Figure 2

Housing Capacity by Income (with additional resources)



Table 8. Proposed UGA - Commercial/Industrial Land Capacity Analysis Results		
1	Employment Growth Capacity of Proposed UGA	21,085
2	Employment Growth Allocation Proposed	19,384
3	Surplus (Deficit)	1,701

Bellingham's employment growth proposal allocates 19,384 jobs or about 880 jobs per year (2023-2045). The LCA estimates capacity for 21,085 jobs in new construction related to commercial (includes institutional uses) and industrial zones. Prior to the Covid-19 Pandemic, Bellingham was growing by an estimated 1,815 jobs per year. Employment dropped significantly during the Pandemic and has not recovered to previous levels. Recent City surveys in the community indicate remote work is an option utilized by nearly 60% of the local workforce, with about 25% of workers choosing to work remote a majority of the time. This trend is common to most urban areas and is something Bellingham will continue to monitor in the coming years.

VII. Capital Facility Planning

The City and special districts, as applicable, have undertaken the following capital facility planning efforts in order to assure adequate public facilities and services are planned for the UGA.

Water – Bellingham's draft 2025 Water System Plan anticipates and includes the capacity to serve the population, housing, and employment growth allocated in the city's growth proposal.

Sewer – Bellingham's Sewer System Plan is scheduled for update in 2026. The 2009 Sewer Plan and 2016 Wastewater Conveyance Plan include infrastructure necessary to serve development in the UGA and the UGA Reserve areas.

Stormwater – The City updated its Surface and Stormwater Comprehensive Plan in 2020 to identify and plan for population growth and development, ongoing operations and maintenance requirements, safety and property damage issues related to flooding, and environmental concerns for water quality and aquatic resources. The City's Plan and rate study update provide a road map for the City's stormwater utility and Capital Improvement Plan (CIP) programs with implementation strategies to keep pace with new development.

Fire Protection – Bellingham is developing a public safety strategic plan that will guide their future public safety operations. Bellingham's draft Capital Facilities Plan includes a discussion of fire service facilities, equipment, and staffing needs, and level of service standards necessary to serve the community and anticipated growth during the planning period. Additionally,

the surrounding rural fire districts are updating capital facility plans in coordination with Whatcom County.

Schools – The Bellingham and Meridian school districts are both in the process of updating their capital facility plans to align with growth anticipated during the 2025-2045 planning period.

Transportation – Bellingham's draft Multimodal Transportation Plan includes a capital projects list that anticipates the transportation needs of the city's growth proposal.

VIII. UGA Expansions into UGA Reserves (if applicable)

Bellingham is proposing to expand the UGA into the UGA Reserve.

Whatcom County Comprehensive Plan Chapter 2 contains criteria for transferring properties from the UGA Reserve to UGA. The general criteria are set forth below:

1. Need for Land Capacity. The need for additional land is necessary to accommodate projected urban growth, as documented in a land capacity analysis. A transfer from Urban Growth Area Reserve to Urban Growth Area will not be allowed which would provide capacity to accommodate substantially more than 20 years of urban growth. Additional consideration can be made regarding the mix of housing and employment opportunities that are required to serve the Urban Growth Area which could be accommodated in the Urban Growth Area Reserve and which cannot be accommodated within the Urban Growth Area.

City Comments: Bellingham's land capacity analysis shows a lack of available land to meet projected housing needs within the existing city and unincorporated UGA. The land added from the North Bellingham UGA Reserve (Caitac) and adjacent areas south of West Larson Road is anticipated to provide enough capacity to meet the growth proposal. In particular, the conceptual plan provided by the primary property owner (Caitac USA) includes a diverse mix of housing types including middle housing and multi-unit housing with opportunities for homeownership.

2. Adequate Public Facilities and Services. There are plans and capacity to serve the areas with urban governmental services as set forth in the Growth Management Act. There is no requirement to extend these services prior to transferring the area from Urban Growth Area Reserve to Urban Growth Area, but the Capital Facility Plans must document the capacity and plans to serve at urban levels of service within the 20-year planning period.

City Comments: Bellingham's utility and transportation plans include capacity to serve the growth anticipated for this area during the 2025-2045 planning period. Additionally, the draft Meridian School District Capital Facility Plan includes anticipated facility needs and mitigation measures for funding these facilities for the growth anticipated during the planning period.

3. Land Use Plans. The respective city, or county for unincorporated Urban Growth Areas, has a comprehensive plan and land use regulations in place to allow for the transition from Urban Growth Area Reserve to Urban Growth Area. The respective jurisdiction will also have in place development regulations that ensure urban densities are achieved within the existing Urban Growth Area. Urban Growth Area Reserves should be jointly planned between Whatcom County and the respective city.

City Comments: Bellingham's comprehensive plan (The Bellingham Plan) includes policies calling for development of an updated annexation plan and for pre-zoning the entire unincorporated UGA (including expansion areas) to establish appropriate future city zoning designations that would be realized with annexation. These zones would include the same urban densities and development incentives proposed for areas currently inside the city. The evaluation of zoning in the UGA will be conducted in collaboration with Whatcom County and affected property owners. If included in Bellingham's UGA, the Reserve area would need to be zoned for urban levels of development prior to annexation. Draft policies in the Bellingham Plan Land Use chapter (see examples below) call for careful management of the limited supply of developable land to meet the community's long-term growth capacity needs. To meet those needs, areas added to the UGA should be zoned for true urban development rather than inefficient suburban patterns that are costly to serve.

LU-11. Utilize and periodically update an annexation plan that includes for each area of the UGA and UGA Reserve

- Identification of future land use and zoning designations for that area, considering long-term community needs; and
- Analysis of the opportunities (e.g. providing needed land uses, infrastructure, revenue or other benefits to the city), costs (e.g. providing and maintaining services and infrastructure to the annexation area, impacts to others or the environment) and priorities of annexing that area, including a sustainable approach to servicing it that may include phased level of service standards.

LU-12. Retain or add to the UGA or UGA reserve areas that have the ability to provide urban levels of development with land uses that fulfill an identified need, applying those urban land use designations upon annexation.

LU-13. Collaborate with Whatcom County and applicable school or utility districts to identify areas for addition to the UGA or UGA Reserve, discourage rural development in the UGA and UGA Reserve and develop a transition strategy for annexation of those areas.

LU-14. Work with Whatcom County to apply the City's infrastructure improvement standards and environmental regulations in the City's unincorporated UGA.

LU-15. Establish and maintain a periodic collaboration with the City of Ferndale to intentionally plan future annexations or UGA and open space corridor changes within the areas between Bellingham and Ferndale.

LU-16. Allow annexations of land in Bellingham's unincorporated UGA only when the analysis required in the annexation plan is complete and includes a financially sustainable approach to provide urban facilities and services such as police, fire, water and sewer.

4. Natural Resource Lands. Expansion into the Urban Growth Area Reserve will not allow uses that are incompatible with adjoining natural resource lands unless mitigated through buffers, increased setbacks or other measures as necessary to maintain the productivity of the adjacent resource lands. If the expansion is into lands zoned Agricultural, the city and county shall have an interlocal agreement or regulations in place that implement a program that outlines the respective roles in protecting at least 100,000 acres of agricultural land in Whatcom County.

City Comments: Whatcom County requires a disclosure notice to be recorded against certain properties located near ag and forestry land, these "right to farm and right to practice forestry" notices inform property owners that farming and forestry operations may have additional noises, smells or other characteristics. Some properties in the UGA may be located near these business operations.

5. Environment. Land use regulations are in place to ensure protection of the environment and sensitive watersheds.

City Comments: Following annexation, development proposals will be reviewed in accordance with and be subject to the requirements in Bellingham's Critical Areas regulations in Title 16 of the Bellingham

Municipal Code. These regulations provide for the protection of and mitigation of impacts to the environment and sensitive watersheds.

6. Open Space Corridors. Continued provisions are made for open space corridors within and between Urban Growth Areas where not otherwise precluded by previous development patterns.

City Comments: Bellingham's Park Recreation and Open Space Plan includes identified open space corridors within the city and unincorporated UGA including corridors between the Bellingham International Airport and the City of Ferndale UGA.

Whatcom County Comprehensive Plan Chapter 2 also contains specific criteria for transferring UGA Reserve to UGA. These criteria are set forth below:

Bellingham Urban Area

The south Yew St. and the south Caitac areas have been designated as Urban Growth Area Reserves. Prior to redesignating the south Yew St. area to UGA, need for additional land capacity must be demonstrated, planning for adequate public facilities and services must be completed, and potential impacts on Lake Padden water quality must be addressed. Prior to re-designating the south Caitac area to UGA, need for additional land capacity must be demonstrated and planning for adequate public facilities and services must be completed. UGA Reserve areas should retain rural zoning until such time the unincorporated area is placed in the UGA.

Bellingham's land capacity analysis does indicate a shortage of land for housing. To address this need, the city is proposing to add the North Bellingham UGA Reserve (south Caitac area) and adjacent tax parcels south of West Larson Road into the UGA. The majority of this area is under control of a single owner (Caitac USA) that has expressed a strong interest in developing a significant amount of housing during the planning period including a mix of middle and multi-unit housing in forms aimed at the ownership market. As part of the periodic update, Bellingham has coordinated with the Meridian School District to evaluate anticipated impacts and necessary mitigation measures related to additional housing in this area. Bellingham's draft Multimodal Transportation Plan includes a 20-year capital project list that anticipates development of this area. The draft 2025 Water System Plan includes an analysis of the water storage capacity needs necessary to provide potable water service to this area. And the 2016 Wastewater Conveyance Plan (to be updated in 2026) includes sewer network infrastructure elements to serve this area.

The south Yew Street area is proposed to remain in UGA Reserve status for consideration in a future periodic update. The factors leading to this decision include city acquisition of a significant portion of the developable area through the Greenways program for future trail corridors and preservation of open space, the challenging steep topography compared to the northerly UGA areas, and balancing application of the city's limited funds for development of infrastructure and provision of urban

services. The development capacity in adjacent portions of the city and existing UGA will depend on evaluation and establishment of minimum densities, consideration for mixed-use infill, and planning for infrastructure in the coming years.

IX. UGA Expansion in the Floodplain (if applicable)

Bellingham is not proposing to expand the UGA into areas mapped by FEMA as floodplain.

X. UGA Expansions into Resource Lands (if applicable)

Bellingham is not proposing to expand the UGA or UGA Reserve into lands designated as Agriculture, Rural Forestry, Commercial Forestry, or Mineral Resource Lands on the Whatcom County Comprehensive Plan map.

XI. UGA Swap (if applicable)

Bellingham is not proposing a UGA swap under the GMA.

XII. Conclusions

Based on the results of the land capacity analysis, the current Bellingham UGA does not contain sufficient capacity to accommodate the housing needs for the 2025 to 2045 planning period. To meet the projected housing needs, Bellingham is proposing a variety of changes including:

- Removal of residential UGA areas within the Lake Whatcom Watershed recognizing their prioritization for protection of Bellingham's municipal water source.
- Removal of industrial and commercial UGA areas west and north of the Bellingham International Airport that are highly impacted by wetlands and streams, are largely in state, tribal, or port ownership, and are unlikely to be annexed to Bellingham within the 2025-2045 planning period. These areas are proposed for UGA Reserve status for potential consideration in future planning cycles.
- Expanding the UGA to include the North Bellingham UGA Reserve area and adjacent tax parcels south of West Larson Road into the UGA. The majority of this area is under control of a single owner that has expressed a strong interest in developing a significant amount of housing during the planning period including a mix of middle and multi-unit housing in forms aimed at the ownership market.
- Reconfiguration of all Residential Single zones to a new Residential Low zone that allows single detached as well as middle housing forms (ADUs, duplex-

fourplex, townhomes, cottages, etc.), establishing citywide minimum densities, and allowing 4 to 6 units on every lot (6 if 2 are affordable).

- A variety of regulatory changes to allow more housing, and to make it easier to build housing including allowing co-living housing (individually rented rooms with shared kitchen facilities), more permissive and streamlined rules for emergency shelters, creating objective design standards, simplifying the design review process, allowing single-stair multi-story structures, and expanding the multi-family tax exemption program.
- Expanding goals and policies around transit oriented development (TOD) to include a stronger emphasis on a partnership with WTA to establish higher-intensity land uses along TOD corridors connecting urban villages and institutional campus areas.
- Establishing a Residential Watershed zone in the Lake Whatcom Watershed to recognize the water-quality priorities of this area and allow for an emphasis on higher density infill in other areas of the city.