



Memorandum

October 25, 2022

To: The Honorable Satpal Sidhu, Whatcom County Executive
The Honorable Whatcom County Council

From: Matt Aamot, Senior Planner

Through: Steve Roberge, Assistant Director

RE: Buildable Lands Report 2022

The Washington State legislature amended the Growth Management Act (GMA) in 1997 to include a "review and evaluation program," also known as the buildable lands program (RCW 36.70A.215). At that time, the review and evaluation program applied to six counties: Clark, King, Kitsap, Pierce, Snohomish, and Thurston. The State legislature amended the GMA in 2017 to add Whatcom County to the list of counties required to undertake a review and evaluation program ([ESSSB 5254](#)).

The review and evaluation program has several main components, which are summarized below:

- Determining whether a county and its cities are achieving urban densities within urban growth areas by comparing growth and development assumptions contained in the county and city comprehensive plans with actual growth and development that has occurred;
- Determining whether there is sufficient land that is suitable for development in the future; and
- Identifying reasonable measures, if necessary, to reduce the differences between growth assumptions contained in comprehensive plans and actual development patterns ([RCW 36.70A.215](#)).

The County and the Cities, with the assistance of a consultant, developed the *Buildable Lands Report 2022* to address these state requirements. This Report, issued on July 7, 2022, contains countywide findings and jurisdiction profiles that address each individual urban growth area.

The Planning Commission held a public hearing on October 13, 2022 and recommended that the County Council adopt the *Buildable Lands Report 2022*. Main issues discussed at the Planning Commission included:

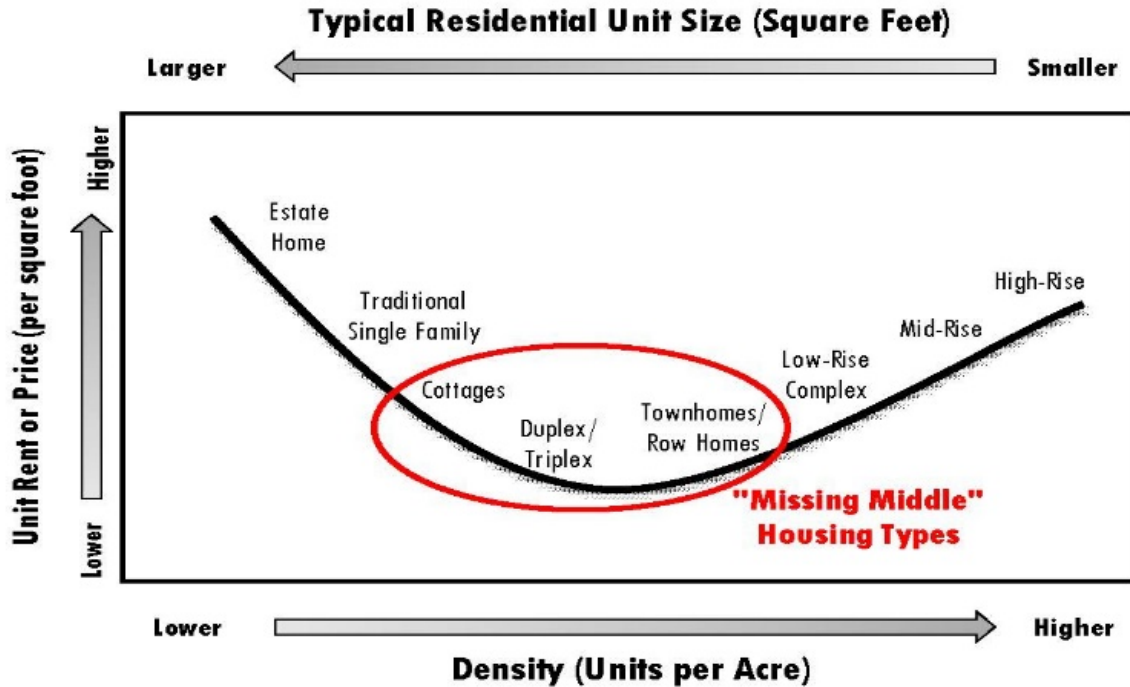
1. Housing affordability; and
2. Land supply for single family homes in Bellingham.

The Planning Commission approved "Findings of Fact and Reasons for Action" adding finding # 1:

Staff and the Planning Commission recognize that the Buildable Lands Report does not address the issue of housing affordability. Additional work that revisits the estimates of supply and demand that are feasible, realistic, and consistent with current regulatory requirements and infrastructure are needed and will be reviewed in the 2025 comprehensive plan updates.

The State legislature amended the GMA by adopting Engrossed Second Substitute House Bill (ESSHB) [1220](#) in 2021. This bill places a greater emphasis on housing affordability in local government planning. However, it relates to the 2025 County and city comprehensive plan updates rather than the Buildable Lands Report. It's anticipated that the State legislature will allocate funding to local governments to conduct the planning required by the bill in 2023. The City/County Planner Group is developing a consultant scope of work for the 2025 comprehensive plan updates and has included the new housing element requirements from ESSHB 1220 in this scope.

The *Buildable Lands Report 2022* finds that new residential construction in Bellingham between 2016 and 2021 occurred at an average 11.5 units per acre compared to the 7.2 units per acre forecast in the 2016 Comprehensive Plan. The Report also finds there is adequate land supply in the Bellingham Urban Growth Area to accommodate projected single family housing units through the end of the current planning period (2036). At the County Planning Commission meeting, the City of Bellingham's Long Range Planning Manager indicated that some of this land supply will be for attached single family residential development. This will include townhouse development where units are attached, but each residence is on its own residential lot. This form of development can provide ownership opportunities with housing units that are less expensive than traditional detached single family dwellings. Attached single family developments also allow realization of intended densities on properties impacted by environmental constraints by clustering smaller lots on buildable areas avoiding wetlands, buffers, and other critical areas. The State Department of Commerce *Housing Memorandum: Issues Affecting Housing Availability and Affordability* (June 2019) states that: ". . . 'missing middle' housing types . . . are moderate-density housing types that also sell or rent at moderate costs compared to detached single-family units and higher-density attached unit types. . ." (p. 84). The State's *Housing Memorandum* includes the following figure on p. 85 showing that townhomes are considered a "missing middle" housing type that tends to be less expensive than traditional single family homes.



The City of Bellingham’s Long Range Planning Manager indicated that Bellingham’s 2023 work program includes updates to the 2018 Accessory Dwelling Unit ordinance, a market study and feasibility report on inclusionary zoning for affordable housing, and updates to the Barkley Urban Village plan.

In the context of the 2025 update to the City of Bellingham Comprehensive Plan, the City will have a community discussion about the forms of housing development that the City will plan to accommodate in the new planning period through the year 2045. It is anticipated that this discussion, and ultimate decisions by the Bellingham City Council, will address the land supply needed to accommodate various forms of housing, including traditional single family detached dwellings and townhouse development. The County will also address housing needs in the 2025 update to the Whatcom County Comprehensive Plan. This will include consideration of land supply for housing and Bellingham’s recommendation on whether or not to expand the Urban Growth Area to accommodate additional housing. City/County coordination through the comprehensive plan updates will be critical to ensure that the housing needs of the larger community are addressed.

Staff will make a presentation on Buildable Lands at County Council’s Planning and Development Committee on November 9. At a later date, we will request Council to conduct a public hearing and adopt an ordinance approving the *Buildable Lands Report 2022*.

Thank you for your review of the Buildable Lands Report. We look forward to discussing it with you.