

**CHAPTER 1 – [Preliminary Planning Commission Version May 22, 2025 \(AB2025-438\)](#)**

#	Page #	Section/Policy #	Question, Comment, or Proposed Amendment	Sponsor
1	1-1	How the Plan was Created	<p><i>Are the goals set in GMA word for word (1) – (15)? Or can we make small edits such as:</i></p> <p><b>Proposed Amendment:</b></p> <p>(5) Economic development. Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all <del>residents</del><u>citizens</u> of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities.</p> <p>(8) Natural resource industries. Maintain and <u>sustainably</u> enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forest lands and productive agricultural lands, and discourage incompatible uses.</p> <p>(11) <del>Citizen-Community</del> participation and coordination. Encourage the involvement of <del>citizens-the community</del> in the planning process, including the participation of vulnerable populations and overburdened communities, and ensure coordination between communities and jurisdictions to reconcile conflicts.</p> <p>(13) Historic preservation. Identify and encourage the preservation of lands, sites, and structures that have historical, <u>cultural</u>, or archaeological significance.</p>	Galloway
2	1-2	How the Plan was Created	<p><b>Proposed Amendment:</b></p> <p>“Third, extensive <del>citizen-community</del> participation was facilitated through meetings, presentations, public hearings, and written comments made throughout this process, <u>consistent with the Public Participation Plan</u>.”</p> <p><b>Hyperlink Public Participation Plan or add to the appendix:</b>  <a href="https://www.whatcomcounty.us/DocumentCenter/View/85488/Approved-Public-Participation-Plan-June-4-2024---2025-Update">https://www.whatcomcounty.us/DocumentCenter/View/85488/Approved-Public-Participation-Plan-June-4-2024---2025-Update</a></p> <p><i>Follow up question regarding Public Participation Plan:</i></p> <p><i>Is there a plan to update the Plan to reflect the changes in timeline and deliverables? Since some of the anticipated workshops and community engagement opportunities have not come to fruition. Would also be helpful to update the schedule for chapter releases.</i></p>	Galloway

3	1-3	Introducing Whatcom County	<p><i>Do we want to add a land acknowledgement?</i></p> <p><i>Reference other indigenous populations?</i></p>	Galloway
4	1-3	Countywide Planning Policies	<p><b>Proposed Amendment:</b></p> <p>The Whatcom County Council, in conjunction with the cities, previously adopted a set of Countywide Planning Policies (see Appendix C, <u>for those policies in place when this update began</u>). The framework provided by the adopted Countywide Planning Policies ensures that local planning efforts will be consistent with one another and supportive of regional goals. <u>Policies existing when the 2025 update began directed jurisdictions to plan based on the most accurate population projections provided by the Office of Financial Management (OFM). Those CPP policies were amended halfway through this Comprehensive Plan update to allow planning based on more flexible uses of OFM projections, rather than the most accurate projections.</u></p>	Donovan
5	1-4	Goal 1A	<p><b>Proposed Amendment:</b></p> <p>Ensure that government activities, regulations and policies are transparent, accountable, <u>accessible</u>, and easy to understand.</p>	Galloway
6	1-8	Population Projections	<p><b>Proposed Amendment:</b></p> <p>The County's 2045 population projection of 303,438 is within OFM's range <del>and therefore requires no further justification</del>. The rationale for using this figure, which is above OFM's medium projection, include: ensuring an adequate land supply to accommodate growth, the need to plan for growth, and the need to protect the quality of life and natural resources in Whatcom County</p> <p><i>Rationale: Seems contradictory to the following sentence which is providing rationale.</i></p>	Galloway
7	1-8	Population Projections	<p>"This population projection is selected for planning purposes."</p> <p><i>Need help understanding the policy implications of opting for a projection higher than OFM medium. Given RCW 36.70A.110, what are the County's obligations to designating new UGAs or areas within which urban growth shall be encouraged?</i></p> <p><i>How do we reconcile what we are hearing from jurisdictions, that infrastructure cost will be a significant financial barrier to accommodating growth even within the UGAs and that the cost of over-planning and building more infrastructure to accommodate a higher projection than actual growth experienced is ultimately passed on to tax payers and residents, and further impacts affordability and cost of living?</i></p>	Galloway
8	1-9	Table 4	<p><b>Proposed Amendment:</b></p> <p>Revert to OFM Medium for Birch Bay UGA (2,313 rather than 2,662) and Columbia Valley UGA (988 rather than 1,137)</p>	Galloway

9	1-10	Employment Projections	<p>Employment <u>Projections</u></p> <p><i>The title to this section used to say Employment Projections, in this draft, the word projections is removed. Councilmember Donovan would like to see the word “projections” added back.</i></p>	Donovan
10	1-10	Employment	<p><i>Need help understanding this sentence:</i></p> <p>“Due to the challenge in designating lands for commercial or industrial development, the allocation of employment allowed for these optimistic scenarios.”</p>	Galloway
11	1-10	Employment Projections	<p><b>Proposed Amendment:</b></p> <p>Employment allocations were based largely on the local request recognizing the incentives that cities have for larger employment areas (sales tax, property tax). <del>Due to the challenge in designating lands for commercial or industrial development, the allocation of employment allowed for these optimistic scenarios.</del> <u>Most of the employment projections displayed in Table 5 shows the allocation of employment to for the Urban Growth Areas and the area outside UGAs greatly exceed the “high” projections provided in the Technical Analysis (Leland Report).</u></p>	Donovan
12	1-11	Table 5	<p><i>Most of the employment projections/allocations are OFM high or above high. What are the implications? Are these reasonable? Do we want to consider something more reasonable or closer to OFM medium? Have we engaged Cherry Point industries/landowners to see if these projections are reasonable within their plans for industrial growth?</i></p> <p><i>And with these employment allocations being not proportionate to population growth allocations within the UGA, are there unintended consequences we should be tracking such as are we further exacerbating the issues related to increased vehicle miles traveled (VMT) by increasing need for commute to other areas?</i></p>	Galloway
13	1-12	Demographics	<p><i>Should we add reference to college/university student populations?</i></p>	Galloway
14	1-13	Land Use History	<p><i>Have we consulted with tribes on this language?</i></p>	Galloway

15	1-14	Current Land Use	<p>Given RCW 36.70A.110, “...shall designate an urban growth area or areas within which urban growth shall be encouraged and <b>outside of which growth can occur only if it is not urban in nature.</b>” Should we specify where county growth is happening, or can happen, or should be happening? Given the RCW references UGAs and other areas, and specifies outside of those designated areas should not be urban in nature.</p> <p><b>Proposed Amendment:</b></p> <p>The majority of single-family homes are concentrated in the cities, <u>Urban Growth Areas (UGAs), Limited Areas of More Intense Rural Development (LAMIRDS), and other unincorporated areas within the county designated for urban growth</u> <del>the major urban and intensely developed unincorporated rural portions of the county</del> such as Sudden Valley, Columbia Valley, Glacier, Lake Samish, Lake Whatcom (north end), Cain Lake, Birch Bay, Sandy Point, and Lummi Island. Lower density residential development is scattered throughout the rural areas of the County. As may be expected, single-family homes are also located along the valley floors of the three forks of the Nooksack. The Cherry Point industrial area, the agriculturally dominated area north of Lynden and the forested foothills in the eastern part of the county have very low to zero residential density.</p> <p><i>Rationale: if these areas are not UGAs, LAMIRDS, or other areas designated by county for urban level growth, then they should not be urban in nature per RCW. The areas listed, Sudden Valley, Columbia Valley, Glacier, Lake Samish, Lake Whatcom, Cain Lake, Birch Bay, Sandy Point, and Lummi Island – Do we want to be driving growth to these areas given future climate impacts, watershed health, and inadequate infrastructure. These areas if not designated as UGA or LAMIRD seem incompatible with urban growth.</i></p>	Galloway
16	1-14	Current Land Use	<p><b>Proposed Amendment:</b></p> <p>The majority of single-family homes are concentrated in the cities, <u>Urban Growth Areas (UGAs), Limited Areas of More Intense Rural Development (LAMIRDS), and other unincorporated areas within the county designated for urban growth</u> <del>the major urban and intensely developed unincorporated rural portions of the county</del> such as Sudden Valley, Columbia Valley, Glacier, Lake Samish, Lake Whatcom (north end), Cain Lake, Birch Bay, Sandy Point, and Lummi Island. Lower density residential development is scattered throughout the rural areas of the County. As may be expected, single-family homes are also located along the valley floors of the three forks of the Nooksack. The Cherry Point industrial area, the agriculturally dominated area north of Lynden and the forested foothills in the eastern part of the county have very low to zero residential density. <u>A substantial proportion of existing and planned single-family housing, particularly for higher income brackets, is in areas zoned rural.</u></p>	Donovan
17	1-14	Current Land Use	<p><b>Proposed Amendment:</b></p> <p>A prominent characteristic of Whatcom County housing is the high number of vacation, resort, and second-home units found throughout the county. In 2020, approximately 50% of the "vacant" units were occupied part of the year for seasonal, recreational or occasional use (2023 American Community Survey 5-Year Estimates, Table B25004). <u>Over 1000 single-family housing units in the unincorporated areas are used as short-term vacation rentals, which likely increases housing costs (cite the study PDS provided Council).</u></p>	Donovan