11-3-2022

PROPOSED BY: Planning & Development Services
INTRODUCTION DATE: _____

**ORDINANCE NO. _____**

**ADOPTING THE BUILDABLE LANDS REPORT 2022**

**WHEREAS,** The Whatcom County Planning Commission held a public hearing and issued recommendations on the Buildable Lands Report; and

**WHEREAS,** The County Council considered Planning Commission recommendations;

**WHEREAS,** The County Council held a public hearing; and

**WHEREAS,** The County Council hereby adopts the following findings of fact:

**FINDINGS OF FACT**

1. Whatcom County recognizes 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.

2. The proposal is to adopt the *Buildable Lands Report 2022 – Whatcom County Review and Evaluation Program* (July 7, 2022).

3. The SEPA Official determined on July 19, 2022 that adoption of the *Buildable Lands Report 2022 – Whatcom County Review and Evaluation Program* is categorically exempt from SEPA review under WAC 197-11-800(17) as information collection and research.

4. Notice of the Planning Commission hearing was posted on the County website on September 30, 2022.

5. Notice of the Planning Commission hearing was published in the Bellingham Herald on September 30, 2022.

6. Notice of the Planning Commission hearing was sent to the County's email list on September 30, 2022.

7. The Planning Commission held a public hearing and recommended that the County Council adopt the *Buildable Lands Report 2022 – Whatcom County Review and Evaluation Program* on October 13, 2022.

8. The Growth Management Act (GMA) "Review and Evaluation Program" (buildable land) requirements became applicable to Whatcom County and the cities when the State Legislature adopted Engrossed Second Substitute Bill 5254 in 2017.

9. The GMA's Review and Evaluation Program requirements (RCW 36.70A.215) include updating county-wide planning policies, developing a buildable lands program methodology, data collection, reviewing achieved densities, evaluating land suitable for development, and issuing a Buildable Lands Report. The information contained in the Buildable Lands Report will inform the next update of the Whatcom County Comprehensive Plan, which is due by June 30, 2025.

10. The County's consultant held interviews with representatives of each jurisdiction and several key community stakeholders. This information was compiled in a *Stakeholder Interview Summary Whatcom County Review and Evaluation (Buildable Lands) Program* (CAI, May 2019).

11. The County's consultant conducted research on topics with important implications for the buildable lands report, including local regulations, infrastructure, housing affordability, and growth trends. This included reviewing relevant portions of the Revised Code of Washington and Washington Administrative Code. This information was compiled in a *Background Information and Key Issues Report* (CAI, June 2019).

12. Whatcom County and the cities, with the assistance of a consultant, developed the *Whatcom County Review and Evaluation Program Public Participation Plan* (April 2020) and have followed that Plan.

13. Whatcom County and the cities developed draft Countywide Planning Policies establishing the Review and Evaluation Program. The Whatcom County Planning Commission held a public hearing on these Countywide Planning Policies on September 10, 2020. The Whatcom County Council held a public hearing and adopted the Countywide Planning Policies on February 9, 2021 (Ordinance 2021-003).

14. Whatcom County and the cities, with the assistance of a consultant, drafted the *Whatcom County Review and Evaluation Program Methodology* to implement the 2017 state amendments to the GMA. Stakeholders reviewed and provided comments on preliminary draft versions of this Methodology in 2021. Modifications to the draft Methodology were made based upon stakeholder comments in 2021. The Whatcom County Planning Commission held a public hearing on the draft Methodology on

October 28, 2021. The County Council and city councils were briefed on the draft Methodology in 2021-2022. The Whatcom County Planning Director approved the Methodology on February 10, 2022.

15. Whatcom County and the cities, with the assistance of a consultant, developed Data Reporting Tool templates for collection of data on development and local government ordinances over the review period. The templates are intended to facilitate uniform collection of data by the County and cities.

16. The County and cities entered information in the Data Reporting Tools, including information on building permits and plats issued between April 1, 2016 and March 31, 2021. The Data Reporting Tools calculate achieved densities over the five year review period.

17. Whatcom County and the cities, with the assistance of a consultant, developed Suitable Land Tool templates for estimating the amount of land available for development over the remaining portion of the planning period. The templates are intended to facilitate uniform evaluation of land supply by the County and cities.

18. The County and cities entered information in the Suitable Land Tools to estimate the capacity of land suitable for development to accommodate population and employment growth over the remaining portion of the existing planning period (2021-2036). The Suitable Land Tools compare the land capacity to the projected population and employment growth to estimate whether there will be a surplus or deficit of land to accommodate projected growth (2021-2036).

19. The City of Bellingham and the County shared draft Data Reporting Tool and Suitable Land Tool spreadsheets at a Buildable Lands - Virtual Stakeholder Workshop on February 9, 2022.

20. Whatcom County and the cities issued the *Buildable Lands Report 2022 – Whatcom County Review and Evaluation Program* on July 7, 2022. This Report summarizes and analyzes information from the Data Reporting Tools, Suitable Land Tools, and other sources to meet the requirements of the Growth Management Act.

21. The *Buildable Lands Report 2022 – Whatcom County Review and Evaluation Program* shows that there is sufficient suitable land to accommodate the countywide population projection contained in the *Whatcom County Comprehensive Plan* (Chapter 1).

22. The *Buildable Lands Report 2022 – Whatcom County Review and Evaluation Program* shows that each Urban Growth Area (UGA), with the exception of the Birch Bay UGA, has sufficient suitable land to accommodate the UGA population projections contained in the *Whatcom County Comprehensive Plan* (Chapter 1).

23. The *Buildable Lands Report 2022 – Whatcom County Review and Evaluation Program* shows that there is sufficient suitable land to accommodate the countywide employment projection contained in the *Whatcom County Comprehensive Plan* (Chapter 1).

24. The *Buildable Lands Report 2022 – Whatcom County Review and Evaluation Program* shows that each UGA has sufficient suitable land to accommodate the UGA employment projections contained in the *Whatcom County Comprehensive Plan* (Chapter 1).

25. The *Buildable Lands Report 2022 – Whatcom County Review and Evaluation Program* shows that reasonable measures are needed for the Birch Bay, Cherry Point, and Columbia Valley UGAs pursuant to RCW 36.70A.215.

26. For the Birch Bay UGA, reasonable measures are needed to address:

    a. Achieved residential densities between 2016 and 2021 were below the planned densities in *Whatcom County Comprehensive Plan* Chapter 2 (Goal 2P);

    b. Land capacity to accommodate the population projection adopted in *Whatcom County Comprehensive Plan* Chapter 1; and

    c. Land capacity to accommodate single family housing needs as set forth in *Whatcom County Comprehensive Plan* Chapter 3.

27. For the Cherry Point UGA, reasonable measures are needed to address employment growth because growth that occurred between 2016 and 2021 was significantly below the planned growth projected in the *Whatcom County Comprehensive Plan* (Chapter 1). Employment growth would had exceeded the planned growth, except that a major employer shut down in 2020.

28. For the Columbia Valley UGA, reasonable measures are needed to address employment growth because growth that occurred between 2016 and 2021 was significantly below the planned growth projected in the *Whatcom County Comprehensive Plan* (Chapter 1).

29. Reasonable measures are not needed for any other lands in unincorporated Whatcom County.

**NOW, THEREFORE, BE IT ORDAINED** by the Whatcom County Council that:

**Section 1.** The review and evaluation required by the Growth Management Act has occurred and the *Buildable Lands Report 2022 – Whatcom County Review and Evaluation Program* has been issued in accordance with RCW 36.70A.215.

**Section 2.** The Whatcom County Council hereby adopts the *Buildable Lands Report 2022 – Whatcom County Review and Evaluation Program* (Exhibit A); and

**Section 3.** The Whatcom County Council has determined that reasonable measures are needed for the Birch Bay, Cherry Point, and Columbia Valley Urban Growth Areas (UGAs) pursuant to RCW 36.70A.215.

**Section 4.** For the Birch Bay UGA reasonable measures are needed to address:

- Achieved densities that occurred between 2016 and 2021 that were below the planned densities in Whatcom County Comprehensive Plan Chapter 2 (Goal 2P);
- Land capacity to accommodate the population projection adopted in Whatcom County Comprehensive Plan Chapter 1; and
- Land capacity to accommodate the single family housing need as set forth in Whatcom County Comprehensive Plan Chapter 3.

**Section 5.** For the Cherry Point UGA reasonable measures are needed to address employment growth that occurred between 2016 and 2021 that was significantly below the planned growth projected in Whatcom County Comprehensive Plan Chapter 1. Employment growth would have exceeded the planned growth, except that a major employer shut down in 2020.

**Section 6.** For the Columbia Valley UGA reasonable measures are needed to address employment growth that occurred between 2016 and 2021 that was significantly below the planned growth projected in Whatcom County Comprehensive Plan Chapter 1.

**Section 7.** Reasonable measures are not needed for any other lands in unincorporated Whatcom County.

**Section 8.** The Clerk of the Council is hereby instructed to publish notice of the ordinance adopting the *Buildable Lands Report 2022 – Whatcom County Review and Evaluation Program* pursuant to RCW 36.70A.290.

**Section 9.** Adjudication of invalidity of any of the sections, clauses, or provisions of this ordinance shall not affect or impair the validity of the ordinance as a whole or any part thereof other than the part so declared to be invalid.

ADOPTED this _____ day of _____, 2022.

WHATCOM COUNTY COUNCIL
WHATCOM COUNTY, WASHINGTON

ATTEST:

_____ _____

Dana Brown-Davis, Council Clerk Todd Donovan, Chairperson

APPROVED as to form: ( ) Approved ( ) Denied

/s/ Karen Frakes

_____ _____

Civil Deputy Prosecutor Satpal Sidhu, County Executive

Date: _____

# Exhibit A

Buildable Lands Report

# Buildable Lands Report 2022

## Whatcom County Review and Evaluation Program

July 7, 2022

# ACKNOWLEDGEMENTS


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- Matt Aamot, Whatcom County

## Technical Committee

- Greg Aucutt, City of Bellingham
- Chris Behee, City of Bellingham
- Jori Burnett, City of Ferndale (former member)
- Michael, Cerbone, City of Ferndale
- Heidi Gudde, City of Lynden
- Eric Guida, Washington State Department of Commerce (former member)
- Rollin Harper, Cities of Everson, Nooksack, and Sumas
- Haylie Miller, City of Ferndale (former member)
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# Executive Summary

The *Whatcom County Buildable Lands Report 2022* is the first report completed by the County and cities consistent with the requirements of the Review and Evaluation Program within Washington State's Growth Management Act (*RCW 36.70A.215*). The purpose of this report is to assess how recent development in the cities and urban growth areas (UGAs) has compared with planning assumptions, targets, and objectives in adopted Countywide Planning Policies and comprehensive plans, and whether there are inconsistencies for the County and cities to address. The report assesses how much land is available to serve future growth, and whether it is sufficient to accommodate expected growth. Finally, the report provides basic information relating to development on rural and resource lands (areas outside UGAs).

## Population & Employment Growth

From 2016-2021, new residential construction in Whatcom County and the cities accommodated an estimated 24% of the projected 20-year population growth for the planning period (2016 through 2036). The County and cities will need to accommodate another 46,069 persons for the remaining period 2021 through 2036. From 2016 to 2021, new commercial and industrial construction in Whatcom County and the cities accommodated an estimated 17% of the projected employment growth for the 20-year planning period, and will need to accommodate another 26,640 jobs by 2036.

- Whatcom County contains 10 urban growth areas (UGAs). Seven UGAs represent future annexation areas for corresponding incorporated cities. Three are standalone UGAs, not associated with a city.
- Whatcom County is projected to have 275,450 residents and 120,284 employees by 2036 with projected growth allocations of 60,565 for population and 32,219 for employment between 2016 and 2036.
- New construction in Whatcom County and the cities accommodated an estimated 14,496 people (84% within UGAs) and 5,539 employees (94% within UGAs) from 2016-2021.
- Whatcom County has an estimated 46,069 population growth and 26,640 employment growth remaining to accommodate between 2021 and 2036.

## Development Activity

From 2016-2021, Whatcom County and the cities permitted 6,729 new housing units, averaging 1,346 per year. This average will need to increase to accommodate remaining projected population growth. Achieved densities in incorporated city UGA areas are exceeding planned densities, while achieved

commercial and industrial densities are lagging in some areas. The Jurisdiction Profiles section of this report contains UGA-level details on achieved densities for the period 2016-2021.

- Whatcom County and the cities permitted a total of 6,729 housing units countywide between 2016 and 2021 (84% within the UGAs, 16% outside the UGAs).
- On average countywide, the number of net new housing units permitted and built was 1,346 per year from 2016-2021. The jurisdictions will need to increase the average annual housing production to 1,474 units per year from 2021-2036 to accommodate remaining projected population growth.
- Densities ranging from 4.4 to 11.5 dwelling units per acre were achieved for residential uses in incorporated areas and one dwelling unit per 3.7 acres for Non-UGA areas.
- Achieved residential densities in cities exceeded planned densities, while three unincorporated city UGAs had achieved densities that were lower than ultimate planned densities (as city water and sewer are typically not extended to new development outside city limits). Achieved commercial and industrial densities are lagging planned densities in several small cities.
- For non-city UGAs, residential development in the Columbia Valley UGA exceeded the planned density while residential development in the Birch Bay UGA did not.

## Land Suitable for Development

For the inaugural Review and Evaluation Period, it is estimated that Whatcom County UGAs have over 6,102 acres of net developable (vacant, partially-used, and underutilized) land to accommodate remaining projected population and employment growth from 2021-2036. The Jurisdiction Profiles section of this report contains UGA-level details on developable land and deductions. Appendices A through C document annexations, UGA changes, and zoning map changes for the period 2016-2021.

- Whatcom County UGAs, which include cities, have estimated net land capacity for remaining population growth of 73,075 for the remainder of the 20-year planning period from 2021 to 2036, indicating an estimated population capacity surplus of 34,385.
- Whatcom County UGAs, which include cities, have estimated net land capacity for remaining employment growth of 41,057 for the remainder of the 20-year planning period from 2021 to 2036, indicating an estimated employment capacity surplus of 16,841.

## Inconsistencies and Reasonable Measures

On a county-wide basis, surplus capacity exists to accommodate both remaining projected population and employment growth for the rest of the 20-year planning period through 2036. In addition, planned residential densities in the cities are being achieved.

When planned densities are not being achieved, there is not sufficient capacity to accommodate remaining projected population or employment growth, or development patterns are not occurring as planned, Whatcom County and the cities will work together to determine if reasonable measures are necessary to address the issue, with the jurisdiction making the final decision on reasonable measures.

A list of potential reasonable measures that jurisdictions may consider, if needed, are documented in the *Whatcom County Review and Evaluation Program Methodology (February 10, 2022), Appendix A.* The Jurisdiction Profiles address whether reasonable measures may be needed for individual UGAs.

# INTRODUCTION

## Background and Purpose

The Review and Evaluation Program, which is also known as the Buildable Lands program, is part of Washington State's Growth Management Act (GMA). The program requires that certain counties and cities review the growth and development that has occurred within their jurisdictions since the last updates to their State mandated comprehensive plans. Past growth is compared with the growth and development assumptions, targets, and objectives that are contained in the current plans. Where actual growth diverges from growth and development assumptions, the State calls on the jurisdictions to implement "reasonable measures" in the next comprehensive plan updates to maintain consistency with GMA requirements (*RCW 36.70A.215(1)*). Under the GMA, the deadline for the next comprehensive plan updates is June 30, 2025.

The GMA's Review and Evaluation Program was established in 1997 and originally applied to all jurisdictions within six counties. The first major revision to the program was completed in 2017, when the State Legislature passed Engrossed Second Substitute Bill (E2SSB) 5254. As part of this revision, Whatcom County was added as the seventh Buildable Lands county.

The *Buildable Lands Report 2022* is the County and cities first report responding to the review and evaluation requirements of GMA. The report reviews development data from 2016-2021, and evaluates capacity to serve remaining growth through 2036, the planning horizon from the most recently adopted comprehensive plan.

The report summarizes development data at the city, UGA and County level to answer the following questions:

- What is the actual density and type of housing (single family and multifamily) that has been built in Whatcom County's UGAs? Approximately how much population does it support? Are urban densities being achieved?
- How much land has been developed for commercial and industrial uses? Approximately how much employment does it support?
- How does this development activity compare with growth and development assumptions, targets, and objectives in the comprehensive plans?
- How much population and employment growth remains to be accommodated by 2036? Is there sufficient land and densities in UGAs to accommodate planned growth?

Whatcom County and the cities have updated the inventory of vacant, partially-used, and underutilized land in accordance with the *Whatcom County Review and Evaluation Program Methodology*. This is the supply of land available to serve future growth. Using recent achieved densities and other data as a guide, the report estimates how much population and employment this land can support. This analysis is used to answer the following question: is there enough suitable land to accommodate population and employment growth through 2036?

Where inconsistencies are identified, the report will discuss whether "reasonable measures" may be needed to address inconsistencies in the upcoming comprehensive plan update cycle. Ultimately, the County and each city will individually determine whether reasonable measures are required for their jurisdiction.

## Methods

The methods for this analysis were developed based on the Department of Commerce's 2018 *Buildable Lands Guidelines* and the *Whatcom County Review and Evaluation Program Methodology*. A technical committee with representatives of the County and each city (City/County Planner Group) met regularly to discuss and establish key elements of the program. Program methods are summarized in the "Methods" section, with full detail provided in the *Whatcom County Review and Evaluation Program Methodology*.

## Organization of Report

This report is organized into the following sections:

- **Policy Framework.** Explains key Whatcom County policies relevant to the program, including Countywide Planning Policies and growth allocations.
- **Methods.** Explains how data was gathered and analyzed for this report, key assumptions, and how these methods were developed.
- **Countywide Findings.** Summarizes the ability of UGAs and other areas to accommodate adopted population and employment allocations through 2036. Seven of the ten UGAs correspond to cities.
- **Jurisdiction Profiles.** Provides detailed findings for recent development activity and land suitable for development at the UGA and zoning designation level.

# POLICY FRAMEWORK

## Countywide Planning Policies

The County and cities worked together to develop Countywide Planning Policies to establish and guide the Review and Evaluation Program, as required by RCW 36.70A.215. In summary, Countywide Planning Policies Q.1 - Q.8:

- Indicate that the County and cities will cooperate to implement and maintain the Review and Evaluation Program;
- Set forth the purposes of the program;
- Address the Review and Evaluation Program Methodology; and
- Indicate that the County and cities will prepare a Buildable Lands Report, collect and analyze development data, and discuss potential reasonable measures if there are inconsistencies between actual development patterns and assumptions contained in the County or city comprehensive plans.

The County and cities also developed Countywide Planning Policies R.1 – R.4 relating to Dispute Resolution Procedures.

## Population and Employment Growth Allocations

A key outcome of the Review and Evaluation Program is estimating population and employment growth and determining if population and employment capacity are consistent with adopted growth targets. Whatcom County has adopted population projections by UGA and for areas outside of UGAs (Non-UGAs) through 2036 in the *Whatcom County Comprehensive Plan, Chapter 1 (page 1-7).* Total Whatcom County population is projected at 275,450 by 2036. The Comprehensive Plan also adopts employment projections for 2036 (page 1-8), totaling 120,284 by 2036.

For the purposes of the Review and Evaluation Program analysis, population and employment growth projections have been pro-rated to the 2016-2036 timeframe to fit the Review and Evaluation period (**Exhibit 1** and **Exhibit 2**).

Population and employment growth estimates for 2016-2021 are subtracted from total projected growth by UGA for 2016-2036 to estimate the remaining population and employment growth to be accommodated during the review period (2021-2036). This remaining growth to be accommodated is then compared to estimated population and employment capacity to understand if there are sufficient land and densities to accommodate planned growth.

**Exhibit 1. Whatcom County Comprehensive Plan Population (2013-2036) and Pro-Rated Population Growth (2016-2036)**

| UGA | 2013 Population | 2036 Population Allocation | 2016-2036 Population Growth |
|---|---|---|---|
| Bellingham | 92,660 | 123,710 | 27,000 |
| Birch Bay | 7,540 | 12,822 | 4,593 |
| Blaine | 5,171 | 9,585 | 3,838 |
| Columbia Valley | 3,103 | 4,448 | 1,170 |
| Everson | 2,665 | 3,907 | 1,080 |
| Ferndale | 12,758 | 19,591 | 5,942 |
| Lynden | 12,872 | 19,275 | 5,568 |
| Nooksack | 1,435 | 2,425 | 861 |
| Sumas | 1,449 | 2,323 | 760 |
| UGA Total | 139,696 | 198,129 | 50,811 |
| Non-UGA | 66,104 | 77,321 | 9,754 |
| **County Total** | **205,800** | **275,450** | **60,565** |

*Sources: Whatcom County Comprehensive Plan (Chapter 1, page 1-7); Whatcom County, 2021.*
*Notes: The Cherry Point UGA is excluded from this table as no population growth is projected for the UGA.*

**Exhibit 2. Whatcom County Comprehensive Plan Employment (2013-2036) and Pro-Rated Employment Growth (2016-2036)**

| UGA | 2013 Employment | 2036 Employment Allocation | 2016-2036 Employment Growth |
|---|---|---|---|
| Bellingham | 52,359 | 75,000 | 19,688 |
| Birch Bay | 595 | 1,140 | 474 |
| Blaine | 3,062 | 5,159 | 1,823 |
| Cherry Point | 1,993 | 2,883 | 774 |
| Columbia Valley | 85 | 444 | 312 |
| Everson | 710 | 1,312 | 523 |
| Ferndale | 5,372 | 9,372 | 3,478 |
| Lynden | 4,946 | 7,103 | 1,876 |
| Nooksack | 254 | 369 | 100 |
| Sumas | 700 | 1,145 | 387 |
| UGA Total | 70,076 | 103,927 | 29,436 |
| Non-UGA | 13,156 | 16,357 | 2,783 |
| **County Total** | **83,232** | **120,284** | **32,219** |

*Sources: Whatcom County Comprehensive Plan (Chapter 1, page 1-8); Whatcom County, 2021.*

# Methods

This section summarizes the principal methods, data sources, and key assumptions developed for Whatcom County's *Buildable Lands Report 2022*. The complete methodology is documented in the *Whatcom County Review and Evaluation Program Methodology*.

## Data Sources

Whatcom County and the cities collected key data on development in their jurisdiction between 2016 and 2021. Each jurisdiction submitted data and analysis to Whatcom County, who facilitated the overall Buildable Lands process. Whatcom County gathered data for unincorporated UGAs and Non-UGAs (rural areas and resource lands). Jurisdictions collected the following data for this Review and Evaluation Program:

1. **Development activity**, sourced primarily from city and County building permitting and platting data.
2. **Land use and zoning changes**, from local ordinances relating to annexations, changes to UGAs and zoning map changes.
3. **Changes to development and environmental regulations**, from city and County ordinances relating to zoning, development codes and critical areas regulation.
4. **Parcel data,** from County Assessor's real property and parcel files and related extracts, to tabulate and classify types of land available for future development.
5. **Other documentation,** such as changes to planned capital facilities and any adopted reasonable measures that could impact land capacity.

## Data Collection and Evaluation (2016-2021)

Data collection is only required to the extent necessary to determine compliance with RCW 36.70A.215 (including achieved densities and the remaining quantity and types of land available for development during the current planning period). The County and cities entered data into spreadsheet-based Data Reporting Tools for each jurisdiction to capture all required data between April 1, 2016 and March 31, 2021. City data is maintained separately from unincorporated UGA data as building permit records for unincorporated UGAs are maintained and administered by the County and urban development is not generally anticipated to occur in unincorporated city UGAs until they are annexed.

The Data Reporting Tools facilitate the collection, organization, and analysis of permitting, platting, and other data from each city and the County. The data are used to calculate and compare actual achieved densities for the reporting period (2016-2021) with planned densities. The Data Reporting

Tools estimate population and employment growth between 2016- 2021 and estimate population and employment growth for the remainder of the 20-year planning period of the current County Comprehensive Plan (2021-2036).

In looking forward to subsequent updates, additional information on planned future capital facilities, regulatory updates, and any previously adopted reasonable measures will be collected to facilitate tracking by the County and cities. Countywide annexations, UGA changes, and zoning map changes are also inventoried for the reporting period (**Appendix A** through **C**). Data should be collected annually for subsequent Review and Evaluation Periods.

## Review and Evaluation of Land Suitable for Development (2021-2036)

The GMA requires Whatcom County and cities to identify land suitable for development or redevelopment and determine whether there is sufficient suitable land to accommodate future growth. This section outlines the steps and methods used to complete this Buildable Lands analysis. The basic steps for cities and UGAs are as follows:

1. **Review Assumptions and Achieved Densities**
2. **Assemble Net Developable Land Inventory**
3. **Estimate Population and Employment Capacity**
4. **Evaluate Land Capacity Sufficiency**

The County and cities entered data and assumptions into spreadsheet-based Suitable Land Tools for each UGA to estimate population and employment capacity, compare that capacity to growth allocations, and evaluate whether land capacity is sufficient to accommodate growth over the remaining portion of the planning period (2021-2036).

If the analysis identifies shortfalls in land capacity, or if recent development has diverged from planning assumptions, targets, and objectives there is an additional requirement to determine if **reasonable measures** are required to improve consistency.

### Review Assumptions and Achieved Densities

Several key components of the Buildable Lands analysis rely on developing assumptions and calculating the achieved net density of new residential, commercial, and industrial development in cities and UGAs during the reporting period (2016-2021). Two primary steps in the process are:

- Developing assumptions for occupancy rates and average household sizes (for residential development) and occupancy and square feet per employee rates (for commercial / industrial development).

- Determining achieved densities for residential, commercial, and industrial development completed during the reporting period.

Three technical memos developed for Whatcom County's Review and Evaluation Program document methods used to determine the assumptions used in the analysis. *Technical Memo Comparing Whatcom County Occupancy and Persons Per Household Rates by Housing Type and Owner/Renter Tenure* (City of Bellingham, February 2022) examines the differences between occupancy and persons per household rates for single family and multifamily housing types and for renter-occupied and owner-occupied households. *Whatcom County Review and Evaluation Program Birch Bay Occupancy & Persons per Household* Rates (CAI, June 29, 2021) provides alternative assumptions for the Birch Bay UGA. The City of Bellingham developed a *Technical Memo Estimating Square Feet Per Job for Commercial and Industrial Lands in Whatcom County* (October 20, 2020) that evaluates local space utilization patterns for all UGAs throughout the County. Resulting figures are used to translate built commercial and industrial building area into an estimate of the number of employees that can be accommodated in that area. Based on this analysis, each city and Whatcom County selected the appropriate assumed square feet per employee for commercial and industrial development types. **Exhibit 3** summarizes the assumptions by development type and jurisdiction.

**Exhibit 3. Commercial and Industrial Employment Density Estimates in Square Feet per Employee**

| UGA | Commercial | Industrial |
|---|---|---|
| Bellingham | 440 | 660 |
| Birch Bay | 532 | 812 |
| Blaine | 531 | 739 |
| Cherry Point | 205 | 1,779 |
| Columbia Valley | 532 | 812 |
| Everson | 800 | 1,501 |
| Ferndale | 580 | 1,129 |
| Lynden | 721 | 1,037 |
| Nooksack | 605 | 795 |
| Sumas | 669 | 890 |

*Source: Technical Memo Estimating Square Feet Per Job for Commercial and Industrial Lands in Whatcom County, City of Bellingham, October 20, 2020. Whatcom County and cities' Suitable Land Tools.*

Once population and employment assumptions have been selected, the next step is to determine the actual density of residential and employment development that occurred during the reporting period (2016-2021) in terms of dwelling units per net acre for residential development and floor area ratios (FAR) for commercial and industrial development. Later, achieved net density data and other planning assumptions are used to convert developable land into future population and employment capacity for UGAs in the Suitable Land Tools.

## Assemble Net Developable Land Inventory

The Net Developable Land Inventory for UGAs consists of all land which, as of April 1, 2021, was considered **vacant, partially-used, or underutilized** and which is expected to be available for development and served by infrastructure during the current planning period. **Exhibit 4** details the criteria underlying each of these categories.

**Exhibit 4. Criteria for Classifying Developable Land**

| Category | Parcel Zoning | Criteria for Classification |
|---|---|---|
| **Vacant** | All Residential, Commercial, Industrial | Improvement value less than $10,000 |
| **Partially Used** | Single Family | Parcel size greater than three (3) times minimum allowed under zoning.[1] This may be lowered to between two (2) and three (3) times the minimum allowed under zoning at the discretion of the jurisdiction.<br><br>Jurisdictions may propose to exclude parcels with current assessed improvement value > 93rd percentile[2] of jurisdiction improvement values if the parcel size is less than five acres. |
| | Multifamily, Commercial, Industrial | Ratio between improvement value and land value less than 1.0.[3] |

[1] This threshold accounts for parcels less than three times the minimum size that due to parcel configuration, location of existing development on the site, or other factors are not likely to be divided to their maximum potential.

[2] The option to exclude parcels with high improvement values is meant to account for large single family parcels with high-end homes that are unlikely to be subdivided. The 93rd percentile threshold was determined by analyzing the distribution of housing values in the County and selecting a reasonable value that could be applied across all jurisdictions.

[3] The Department of Commerce's *Buildable Lands Guidelines* (2018) state ". . . When the value of the land is near or higher than the value of the improvement on the land, the property is generally going to be more favorable for redevelopment. . ." (page 34).

| Category | Parcel Zoning | Criteria for Classification |
|---|---|---|
| | | Jurisdictions can identify existing development, such as gas stations or uses that preclude significant development on the site, as fully developed when the ratio of improvement value to land value is less than 1.0. If identified as fully developed, the parcel will be subtracted from the inventory. |
| **Under-Utilized** | Single Family | N/A |
| | Multifamily | Parcels occupied by nonconforming single family residential uses. |
| | Commercial and Industrial | Parcels occupied by nonconforming residential uses or other nonconforming uses. |

The net developable land inventory process for the Review and Evaluation Period included the following steps, described in greater detail in the *Whatcom County Review and Evaluation Program Methodology:*

- **Compile Gross Developable Land Inventory:** Identify parcels zoned for residential and employment development which are considered vacant, partially-used, or underutilized.
- **Deduct Critical Areas and Other Areas with Reduced Development Potential:** Remove the parcels and portions of parcels which are impacted by critical areas or other issues that, it is assumed, will not be developable during the planning period.
- **Deduct Land for Future Public Uses:** Remove any land already planned for future capital facilities and quasi-public uses.
- **Infrastructure Gaps:** Determine if there are infrastructure gaps that would reduce or prevent urban density development on vacant, partially-used, and underutilized lands over the remainder of the planning period. Remove land not likely to be served with the capital facilities needed to support urban density development.
- **Deduct Land for Future Infrastructure and Quasi-Public Uses:** Apply percentage reductions to deduct assumed portions of developable land that will be dedicated to future infrastructure and quasi-public

uses. Future infrastructure deductions are informed by the analysis of 2016-2021 permit data for each jurisdiction.

- **Deduct Market Factor:** Apply a reasonable market factor to account for lands that are not likely to be available for development because of landowner preferences or other reasons not accounted in the previous deduction steps. For the Review and Evaluation Period, Whatcom County and the cities have developed a framework, documented in the *Whatcom County Review and Evaluation Program Methodology* to guide development of suitable market factors specific to the UGAs and land uses by development status. Market factors applied by development type and parcel status, as well as the overall average market factor for each UGA are presented in **Exhibit 5**.

**Exhibit 5. Market Factors by UGA, Land Use Category, and Development Status**

| UGA | Single Family | | | Multifamily | | | Commercial | | | Industrial | | | Combined |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Vacant | PU | UU | Vacant | PU | UU | Vacant | PU | UU | Vacant | PU | UU | |
| Bellingham | 22% | 26% | 30% | 20% | 25% | 30% | 20% | 25% | 30% | 20% | 25% | 30% | **24%** |
| Birch Bay | 17% | 27% | 27% | 15% | 27% | 27% | 17% | 27% | 27% | N/A | N/A | N/A | **20%** |
| Blaine | 15% | 25% | 25% | 15% | 25% | 25% | 15% | 25% | 25% | 15% | 25% | 25% | **19%** |
| Cherry Point | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 23% | 33% | 33% | **23%** |
| Columbia Valley | 24% | 30% | N/A | 24% | N/A | 30% | 24% | N/A | 30% | 24% | N/A | N/A | **24%** |
| Everson | 15% | 25% | N/A | 15% | 25% | N/A | 15% | 25% | 25% | 15% | 25% | 25% | **19%** |
| Ferndale | 15% | 25% | 25% | 15% | 25% | 25% | 15% | 25% | 25% | 15% | 25% | 25% | **20%** |
| Lynden | 15% | 25% | N/A | 15% | 25% | 25% | 15% | 25% | 25% | 15% | 25% | 25% | **20%** |
| Nooksack | 15% | 25% | N/A | N/A | N/A | N/A | 15% | 25% | 25% | 15% | N/A | 25% | **21%** |
| Sumas | 15% | 25% | N/A | 15% | 25% | N/A | 15% | N/A | 25% | 15% | 25% | 25% | **19%** |

*Sources: Whatcom County and Cities' Suitable Land Tools, 2022.*
*Note: PU refers to partially-used land. UU refers to underutilized land. N/A's indicate a category that has no assumed future development or no developable land capacity within the jurisdiction.*

After applying the market factor, the final acreage totals by zoning designation and UGA represent the updated net developable land inventory – the land expected to be available to accommodate future population and employment over the remaining planning period.

## Estimate Population and Employment Capacity

In this step, net developable land inventory is converted into population and employment capacity. The final product is an estimate of the number of people and employees that can be accommodated in each UGA on developable land. This process includes the following steps, described in detail in the *Whatcom County Review and Evaluation Program Methodology:*

- **Determine Assumed Future Densities**: Use achieved densities, when available, as the baseline assumed densities for future

development in the UGA over the remaining portion of the current 20- year planning period.

- **Determine Population Capacity:** Apply residential development assumptions, including assumed density, occupancy rate and persons per household to the residential Net Developable Land Inventory to estimate current capacity for new residential development in UGAs.

- **Determine Employment Capacity:** Apply employment development assumptions, including assumed density (FAR), occupancy rate, and employees per square foot to the commercial and industrial net developable land inventory to estimate current capacity for new commercial and industrial development.

## Evaluate Land Capacity Sufficiency

The final step is to evaluate whether there is currently enough land capacity in UGAs to accommodate projected growth through the remainder of the current 20-year planning period (2021-2036). This includes the following steps:

- **Compare Population Capacity to Remaining Projected Growth:** Compare the estimated population growth capacity to the remaining projected population growth. Identify any inconsistencies.

- **Compare Employment Capacity to Remaining Projected Growth:** Compare the estimated employment growth capacity to remaining projected employment growth. Identify any inconsistencies.

## COUNTYWIDE FINDINGS

Whatcom County contains ten urban growth areas (UGAs). Seven UGAs represent future annexation areas for corresponding cities and three are standalone, non-city UGAs (Cherry Point, Columbia Valley, and Birch Bay). Whatcom County as a whole is projected to have 275,450 residents and 120,284 employees by 2036. Whatcom County UGAs have projected growth allocations of 50,811 for population and 29,436 for employment between 2016 and 2036 (**Exhibit 1** and **Exhibit 2**).

Based on data collected by the cities and the County in the Data Reporting Tools for building permits that received final approval between April 1, 2016 and April 1, 2021 and occupancy, persons per household and square feet per employee assumptions, new construction in Whatcom County and the cities accommodated an estimated 14,496 people (84% within UGAs) and 5,539 employees (94% within UGAs) in this five year period (**Exhibit 6** and **Exhibit 7**).

The Washington State Office of Financial Management (OFM) estimates that Whatcom County population grew by 13,631 between April 1, 2016 and April 1, 2021. This total would have been higher if not for the COVID 19 pandemic, which resulted in out-of-county higher education students returning home to engage in on-line classes. OFM estimates that changes in housing occupancy rates and household size in existing 2016 housing stock account for 14% of total growth in countywide household population between 2016 and 2021.

The *Buildable Lands Report 2022* uses the 2036 population projections that were adopted in the 2016 city and County comprehensive plans. The estimated growth from building permits, as compiled in the Data Reporting Tools by the cities and the County, is similar to the growth estimated by OFM (2016-2021) as shown below.

| | County-wide Population Growth (2016-2021) | County-wide Pro-rated Population Growth (2016-2036) | Growth to Accommodate (2021-2036) |
|---|---|---|---|
| Based on information from the Data Reporting Tools | 14,496 | 60,565 | 46,069 |

| | | | |
|---|---|---|---|
| Based upon OFM estimates | 13,631 | 60,565 | 46,934 |

This Buildable Lands Report uses the population growth estimate (2016-2021) from the Data Reporting Tools, which means that Whatcom County and the cities have an estimated 46,069 more people and 26,640 more employees to accommodate between 2021 and 2036 (**Exhibit 6** and **Exhibit 7**).

For the Review and Evaluation Period of 2016-2021, Whatcom County and the cities permitted a total of 6,729 net new housing units (**Exhibit 8**). Of these, 84% were permitted within the UGAs, and 16% were outside the UGAs. On average, the number of net new housing units permitted and built was 1,346 per year for the County as a whole. With 22,1161 additional housing units needed to accommodate projected population growth from 2021 through 2036, and based on UGA-specific occupancy and density assumptions, the cities and County will need to increase the average annual housing production to 1,474 units per year from 2021-2036 **(Exhibit 9)**. This represents an increase of around 9.5% over the 2016-2021 production rate.

From 2016-2021 Whatcom County and the cities also developed a total of 4.0 million square feet of built area on 1,303 commercial and industrial acres supporting an estimated 5,539 jobs (**Exhibit 7** and **Exhibit 10**). UGAs accommodated 95% of the built square footage and 94% of the estimated jobs on 39% of the developed acres. Non-UGA areas accommodated 5% of the built square footage and 6% of the estimated jobs on 61% of the developed acres. Commercial development comprised 84% of this developed acreage for the period 2016-2021, with industrial development comprising 16%. When considering these numbers, it should be noted that some commercial building in the Non-UGAs occurs on rather large parcels where large areas of the lot remain undeveloped. On a countywide basis, commercial development averaged 0.05 floor-area ratio (FAR - a ratio of built square footage to net parcel land area), while industrial development averaged 0.07 FAR.

Between 2016 and 2021, the cities and the Columbia Valley UGA have achieved densities greater than planned for residential uses, while the Birch Bay UGA has not (**Exhibit 11**). These achieved densities ranged from 4.4 to 11.5 dwelling units per net acre for residential uses in incorporated areas and averaged one dwelling unit per 3.7 acres for Non-UGA areas. The unincorporated portions of city UGAs generally lag planned urban densities for their corresponding cities or did not experience residential development during the five-year review period. This is likely due to these as-yet unannexed areas lacking urban zoning and/or infrastructure. These

unincorporated areas serve as urban growth potential for future growth after annexation, when city zoning is adopted and public water and sewer provided.

Four cities have planned densities for commercial development within their incorporated UGAs – Blaine, Everson, Nooksack, and Sumas (**Exhibit 11**). Blaine and Nooksack have achieved densities that are lagging the planned densities for the 2016-2021 period. Everson exceeded its planned commercial density, while Sumas did not have any commercial development in the five-year review period. Whatcom County has not adopted planned densities for commercial uses in its city UGAs, non-city UGAs, nor its Non-UGA areas.

The same four cities also have planned densities for industrial development within their incorporated UGAs (**Exhibit 11**). Blaine is lagging the planned densities for the 2016-2021 period. Sumas has exceeded its planned industrial density, while Everson and Nooksack did not have any industrial development in the five-year review period. Whatcom County has not adopted planned densities for industrial uses in its city-UGAs, non-city UGAs, nor its Non-UGA areas.

The UGAs in Whatcom County have estimated net land capacity for population growth of 73,075 for the remainder of the 20-year planning period from 2021 to 2036, indicating an estimated population capacity surplus of 34,385 (**Exhibit 12**).

The UGAs in Whatcom County have estimated net land capacity for employment growth of 41,057 for the remainder of the 20-year planning period from 2021 to 2036, indicating an estimated employment capacity surplus of 16,841 (**Exhibit 13**).

On a countywide basis, surplus capacity exists to accommodate both remaining projected population and employment growth for the rest of the 20-year planning period through 2036. In addition, planned residential densities in the cities are being achieved.

## Population & Employment Growth

Data collected for the Review and Evaluation Period from 2016-2021 indicate that new construction in Whatcom County and the cities accommodated 14,496 people, or about 24% of its 2016-2036 growth projection of 60,565 for the 20-year planning period (**Exhibit 6**). About 43% of this growth occurred in the City of Bellingham and almost 84% occurred within the urban growth areas (UGAs) of the County.

The remaining projected population growth for the County from 2021-2036 is 46,069. Of this, the Bellingham UGA is allocated 45%, the Ferndale UGA,

8%, the Lynden UGA, 8%; and the Blaine UGA, 7%. Approximately 16% of remaining projected population growth is to be accommodated in non UGA-areas of the County for the remainder of the 20-year planning period.

**Exhibit 6. Population Growth Estimates and Projected Growth, 2016-2036**

| UGA | 2016-2021 Population Growth Estimate | | | 2016-2036 Population Growth Projection | 2021-2036 Remaining Population Growth to Accommodate |
|---|---|---|---|---|---|
| | City | County | Total | | |
| Bellingham | 6,202 | 78 | 6,280 | 27,000 | 20,720 |
| Birch Bay | N/A | 389 | 389 | 4,593 | 4,204 |
| Blaine | 501 | 50 | 551 | 3,838 | 3,287 |
| Cherry Point | N/A | 0 | 0 | 0 | 0 |
| Columbia Valley | N/A | 271 | 271 | 1,170 | 899 |
| Everson | 317 | 0 | 317 | 1,080 | 763 |
| Ferndale | 2,273 | 8 | 2,281 | 5,942 | 3,661 |
| Lynden | 1,665 | 3 | 1,668 | 5,568 | 3,900 |
| Nooksack | 174 | 0 | 174 | 861 | 687 |
| Sumas | 190 | 0 | 190 | 760 | 570 |
| UGA Total | 11,322 | 799 | 12,121 | 50,812 | 38,690 |
| Non-UGA | N/A | 2,375 | 2,375 | 9,754 | 7,379 |
| **Total** | **11,322** | **3,174** | **14,496** | **60,566** | **46,069** |

*Sources: Whatcom County and Cities' Data Reporting Tools, 2022; Community Attributes, Inc., 2021.*

Data collected for the 2016-2021 Review and Evaluation Period indicate that new construction in Whatcom County and the cities accommodated 5,539 jobs, or about 17% of its 2016-2036 growth projection of 32,179 for the 20-year planning period (**Exhibit 7**). Approximately 56% of this growth occurred within the Bellingham UGA, while most of the remaining employment growth occurred in the Ferndale, Lynden, and Blaine UGAs. Almost 94% occurred within the UGAs.

The remaining projected employment growth for the County from 2021-2036 is 26,640. Of this, the Bellingham UGA is allocated 62%; the Ferndale UGA, 9%, the Blaine UGA, 6%, and the Lynden UGA, 5%. Approximately 9% of remaining projected employment growth is to be accommodated in Non-UGA areas of the County for the remainder of the 20-year planning period.

**Exhibit 7. Employment Growth Estimates and Projected Growth, 2016-2036**

| UGA | 2016-2021 Employment Growth Estimate | | | 2016-2036 Employment Growth Projection | 2021-2036 Remaining Employment Growth to Accommodate |
|---|---|---|---|---|---|
| | City | County | Total | | |
| Bellingham | 2,613 | 495 | 3,108 | 19,688 | 16,580 |
| Birch Bay | N/A | 55 | 55 | 474 | 419 |
| Blaine | 245 | 0 | 245 | 1,823 | 1,578 |
| Cherry Point* | N/A | (141) | (141) | 735 | 876 |
| Columbia Valley | N/A | 11 | 11 | 312 | 301 |
| Everson | 13 | 3 | 16 | 523 | 507 |
| Ferndale | 1,132 | 59 | 1,191 | 3,478 | 2,287 |
| Lynden | 622 | 0 | 622 | 1,876 | 1,254 |
| Nooksack | 8 | 0 | 8 | 100 | 92 |
| Sumas | 65 | 0 | 65 | 387 | 322 |
| UGA Total | 4,698 | 482 | 5,180 | 29,396 | 24,216 |
| Non-UGA | N/A | 359 | 359 | 2,783 | 2,424 |
| **Total** | **4,698** | **841** | **5,539** | **32,179** | **26,640** |

*Sources: Whatcom County and Cities' Data Reporting Tools, 2022; Community Attributes, Inc., 2021.*

** Employment for Cherry Point is estimated through supplemental analysis provided to Whatcom County by Western Washington University (Employment at Cherry Point, June 2021), as permit data for this UGA do not accurately reflect employment growth trends. Cherry Point UGA employment declined between 2016 and 2021 because of job losses associated with the Alcoa (Intalco) shutdown.*

## Development Activity

The Review and Evaluation Program tracks both residential and nonresidential development, as well as the distribution of development between urban and rural areas. This analysis tracks housing production to compare against planned growth and the necessary growth rates in terms of housing units to achieve those targets. It also tracks commercial and industrial land developed, building square footage, and development expressed as a floor-to-area ratio (FAR - a ratio of built square footage to net parcel land area).

### Residential Development

For the Review and Evaluation Period of April 1, 2016 through March 31, 2021, the cities and the County permitted a total of 6,729 housing units inside and outside its UGAs (**Exhibit 8**). Of these units, 84% were permitted within the UGAs, and 16% were permitted outside the UGAs.

**Exhibit 8. Net Housing Units Permitted, Rural and Urban Areas Countywide, 2016-2021**

| | 2016* | 2017 | 2018 | 2019 | 2020 | 2021** | Total |
|---|---|---|---|---|---|---|---|
| UGAs | 851 | 1,074 | 946 | 1,041 | 1,140 | 531 | 5,686 |
| Area Outside UGAs | 135 | 198 | 215 | 238 | 215 | 42 | 1,043 |
| Total | 986 | 1,272 | 1,161 | 1,279 | 1,355 | 573 | 6,729 |
| | | | | | | | |
| UGA Share | 86% | 84% | 81% | 81% | 84% | 93% | 84% |
| Outside UGAs Share | 14% | 16% | 19% | 19% | 16% | 7% | 16% |

*Sources: Whatcom County and Cities, 2022; Community Attributes, Inc., 2021.*
** 2016 captures net housing units permitted between April 1, 2016 and December 31, 2016.*
*** 2021 captures net housing units permitted between January 1, 2021 and March 31, 2021.*

Of these new units, almost 48% were permitted and built in the Bellingham UGA (3,219 from 2016-2021), while almost 37% were permitted and built in all other UGAs combined (2,467 units from 2016-2021). The remaining 1,043 units were constructed outside UGAs (**Exhibit 9**).

On average, the number of net new housing units permitted and built was 1,346 per year for the County as a whole (UGA plus Non-UGA areas) for the 2016-2021 Review and Evaluation Period. With 22,116 additional housing units needed to accommodate projected population growth through 2036, and based on the current distribution of single family and multifamily development and UGA specific occupancy and density assumptions, the cities and the County will need to increase average annual housing production to 1,474 units per year from 2021-2036. This represents an increase of around 9.5% over the 2016-2021 production rate.

Relatively small increases in production rates will be needed for the Bellingham, Nooksack, and Columbia Valley UGAs. The Birch Bay and Blaine UGAs will have to substantially increase their housing production rates to meet their population allocation targets. Specifically, housing production in the Birch Bay UGA will need to increase from an average of 46 new units per year in 2016-2021 to 164 units per year for the remainder of the planning period 2021-2036. Housing production in the Blaine UGA will need to increase from 53 to 105 for the remainder of the planning period 2021-2036.

**Exhibit 9. Annual Housing Production Necessary to Accommodate Growth Allocations by UGA and Non-UGA Areas, 2021-2036**

| UGA | Net New Units (2016-2021) | Average Net New Units Per Year (2016-2021) | Additional Housing Units Needed by 2036 | Average Net New Units per Year Needed ( 2021-2036) |
|---|---|---|---|---|
| Bellingham | 3,219 | 644 | 10,620 | 708 |
| Birch Bay | 228 | 46 | 2,462 | 164 |
| Blaine | 263 | 53 | 1,569 | 105 |
| Cherry Point | 0 | 0 | 0 | 0 |
| Columbia Valley | 106 | 21 | 352 | 23 |
| Everson | 108 | 22 | 260 | 17 |
| Ferndale | 893 | 179 | 1,433 | 96 |
| Lynden | 730 | 146 | 1,707 | 114 |
| Nooksack | 58 | 12 | 230 | 15 |
| Sumas | 81 | 16 | 242 | 16 |
| UGA Total | 5,686 | 1,137 | 18,875 | 1,258 |
| Non-UGA | 1,043 | 209 | 3,241 | 216 |
| **County Total** | **6,729** | **1,346** | **22,116** | **1,474** |

*Sources: Whatcom County and Cities, 2022; Community Attributes, Inc., 2022.*

## Commercial & Industrial Development

For the Review and Evaluation Period (April 1, 2016 through March 31, 2021), a total of 4.0 million square feet was constructed on 1,303 commercial and industrial acres supporting an estimated 5,539 jobs inside and outside its urban growth areas (**Exhibit 7** and **Exhibit 10**). UGAs accommodated almost 95%% of the built square footage and 94% of the estimated jobs on approximately 39% of the developed acres. Non-UGA areas accommodated approximately 5% of the built square footage and 6% of the jobs on 61% of the acres. When considering these numbers, it should be noted that some commercial building in the Non-UGAs occurred on rather large parcels where large areas of the lot remain undeveloped.

On a countywide basis, commercial development comprised 84% of this developed acreage for the period 2016-2021, with industrial development comprising 16%. Overall, commercial development averaged 0.05 FAR, while industrial development averaged 0.07 FAR. Within UGAs, commercial development averaged 0.16 FAR, while industrial development averaged 0.17 FAR.

**Exhibit 10. Countywide Nonresidential Development by UGA, 2016-2021**

| UGA | Commercial | | | Industrial | | | Total | | |
|---|---|---|---|---|---|---|---|---|---|
| | Net Acres | Building Sq Ft | FAR | Net Acres | Building Sq Ft | FAR | Net Acres | Building Sq Ft | FAR |
| Bellingham | | | | | | | | | |
| *City* | 110.8 | 1,174,506 | 0.24 | 43.8 | 466,871 | 0.24 | 154.6 | 1,641,377 | 0.24 |
| *County* | 16.6 | 184,246 | 0.26 | 5.3 | 67,200 | 0.29 | 21.8 | 251,446 | 0.26 |
| UGA Total | 127.4 | 1,358,752 | 0.24 | 49.0 | 534,071 | 0.25 | 176.4 | 1,892,823 | 0.25 |
| Birch Bay | 11.9 | 30,628 | 0.06 | 0.0 | 0 | 0.00 | 11.9 | 30,628 | 0.06 |
| Blaine | | | | | | | | | |
| *City* | 6.6 | 116,580 | 0.41 | 0.0 | 0 | 0.00 | 6.6 | 116,580 | 0.41 |
| *County* | 0.0 | 0 | 0.00 | 0.0 | 0 | 0.00 | 0.0 | 0 | 0.00 |
| UGA Total | 6.6 | 116,580 | 0.41 | 0.0 | 0 | 0.00 | 6.6 | 116,580 | 0.41 |
| Cherry Point | 0.0 | 0 | 0.00 | 16.8 | 80,551 | 0.11 | 16.8 | 80,551 | 0.11 |
| Columbia Valley | 2.7 | 6,364 | 0.05 | 0.0 | 0 | 0.00 | 2.7 | 6,364 | 0.05 |
| Everson | | | | | | | | | |
| *City* | 0.9 | 10,825 | 0.26 | 0.0 | 0 | 0.00 | 0.9 | 10,825 | 0.26 |
| *County* | 0.0 | 0 | 0.00 | 16.1 | 5,400 | 0.01 | 16.1 | 5,400 | 0.01 |
| UGA Total | 0.9 | 10,825 | 0.26 | 16.1 | 5,400 | 0.01 | 17.0 | 16,225 | 0.02 |
| Ferndale | | | | | | | | | |
| *City* | 130.5 | 531,565 | 0.09 | 47.9 | 413,301 | 0.20 | 178.4 | 944,866 | 0.12 |
| *County* | 0.0 | 0 | 0.00 | 7.6 | 70,214 | 0.21 | 7.6 | 70,214 | 0.21 |
| UGA Total | 130.5 | 531,565 | 0.09 | 55.5 | 483,515 | 0.20 | 186.0 | 1,015,081 | 0.13 |
| Lynden | | | | | | | | | |
| *City* | 37.3 | 190,276 | 0.12 | 35.4 | 405,818 | 0.26 | 72.8 | 596,094 | 0.19 |
| *County* | 0.0 | 0 | 0.00 | 0.0 | 0 | 0.00 | 0.0 | 0 | 0.00 |
| UGA Total | 37.3 | 190,276 | 0.12 | 35.4 | 405,818 | 0.26 | 72.8 | 596,094 | 0.19 |
| Nooksack | | | | | | | | | |
| *City* | 0.8 | 4,925 | 0.14 | 0.0 | 0 | 0.00 | 0.8 | 4,925 | 0.14 |
| *County* | 0.0 | 0 | 0.00 | 0.0 | 0 | 0.00 | 0.0 | 0 | 0.00 |
| UGA Total | 0.8 | 4,925 | 0.14 | 0.0 | 0 | 0.00 | 0.8 | 4,925 | 0.14 |
| Sumas | | | | | | | | | |
| *City* | 0.0 | 0 | 0.00 | 11.2 | 60,549 | 0.12 | 11.2 | 60,549 | 0.12 |
| *County* | 0.0 | 0 | 0.00 | 0.0 | 0 | 0.00 | 0.0 | 0 | 0.00 |
| UGA Total | 0.0 | 0 | 0.00 | 11.2 | 60,549 | 0.12 | 11.2 | 60,549 | 0.12 |
| UGA Total | 318.2 | 2,249,915 | 0.16 | 183.9 | 1,569,904 | 0.20 | 502.1 | 3,819,820 | 0.17 |
| Non-UGA* | 777.9 | 201,601 | 0.01 | 23.1 | 16,920 | 0.02 | 801.0 | 218,521 | 0.01 |
| **County Total** | **1,096.1** | **2,451,517** | **0.05** | **207.0** | **1,586,824** | **0.18** | **1,303.1** | **4,038,341** | **0.07** |

*Sources: Whatcom County and Cities' Data Reporting Tools, 2022; Community Attributes, Inc., 2021.*
** Non-UGA acreage is gross acres, rather than net acres.*

## Planned and Achieved Densities

The jurisdictions entered permit information into their respective Data Reporting Tools, which calculated the achieved densities (2016-2021). The cities all achieved greater-than-planned residential densities as articulated in their planning and zoning policies and regulations. The cities of Bellingham, Ferndale, Lynden, and Sumas significantly outperformed their planned residential densities for the period.

In the corresponding unincorporated portions of UGAs of Bellingham, Ferndale and Lynden achieved residential densities generally lag planned densities. The unincorporated portions of the Everson, Nooksack, and Sumas UGAs did not experience any residential development between 2016 and 2021. This is largely because these as-yet unannexed areas lack urban zoning and/or infrastructure. The unincorporated areas serve as urban growth potential for future growth after annexation, when city zoning is adopted and public water and sewer provided. For non-city UGAs, residential development in the Columbia Valley UGA exceeded the planned density while residential development in the Birch Bay UGA did not.

Many cities in Whatcom County do not yet have planned commercial or industrial densities. However, several cities have such planned densities. Blaine and Nooksack achieved densities lagged planned densities. Development in Everson and Sumas exceeded planned densities between 2016 and 2021.

**Exhibit 11. Planned and Achieved Densities by Jurisdiction**

| UGA | Residential | | | Commercial | | | Industrial | | |
|---|---|---|---|---|---|---|---|---|---|
| | Planned Density (units/ac) | Achieved Density 2016-2021 (units/ac) | Difference | Planned Density (FAR) | Achieved Density 2016-2021 (FAR) | Difference | Planned Density (FAR) | Achieved Density 2016-2021 (FAR) | Difference |
| Bellingham | | | | | | | | | |
| *City* | 7.2 | 11.5 | 4.3 | N/A | 0.22 | N/A | N/A | 0.24 | N/A |
| *County* | 6.0 | 1.3 | (4.7) | N/A | 0.26 | N/A | N/A | 0.29 | N/A |
| Birch Bay | 5.0 | 4.5 | (0.5) | N/A | 0.06 | N/A | N/A | 0.00 | N/A |
| Blaine | | | | | | | | | |
| *City* | 4.3 | 4.4 | 0.2 | 0.80 | 0.31 | (0.49) | 0.89 | 0.30 | (0.59) |
| *County* | 4.0 | 4.7 | 0.7 | N/A | 0.00 | N/A | N/A | 0.00 | N/A |
| Cherry Point | N/A | 0.0 | N/A | N/A | 0.00 | N/A | N/A | 0.11 | N/A |
| Columbia Valley | 4.0 | 4.9 | 0.9 | N/A | 0.05 | N/A | N/A | 0.00 | N/A |
| Everson | | | | | | | | | |
| *City* | 4.0 | 4.8 | 0.8 | 0.20 | 0.26 | 0.06 | 0.30 | 0.00 | N/A |
| *County* | 4.0 | 0.0 | N/A | N/A | 0.00 | N/A | N/A | 0.01 | N/A |
| Ferndale | | | | | | | | | |
| *City* | 4.0 | 6.4 | 2.4 | N/A | 0.09 | N/A | N/A | 0.20 | N/A |
| *County* | 6.0 | 0.3 | (5.7) | N/A | 0.00 | N/A | N/A | 0.21 | N/A |
| Lynden | | | | | | | | | |
| *City* | 5.0 | 7.1 | 2.1 | NA | 0.12 | N/A | NA | 0.26 | N/A |
| *County* | 6.0 | 1.7 | (4.3) | N/A | 0.00 | N/A | N/A | 0.00 | N/A |
| Nooksack | | | | | | | | | |
| *City* | 4.4 | 5.1 | 0.7 | 0.25 | 0.14 | (0.11) | 0.10 | 0.00 | N/A |
| *County* | 4.0 | 0.0 | N/A | N/A | 0.00 | N/A | N/A | 0.00 | N/A |
| Sumas | | | | | | | | | |
| *City* | 4.9 | 7.5 | 2.7 | 0.22 | 0.00 | N/A | 0.11 | 0.12 | 0.01 |
| *County* | 4.0 | 0.0 | N/A | N/A | 0.00 | N/A | N/A | 0.00 | N/A |
| Non-UGA Areas | N/A | 3.7 | N/A | N/A | 0.01 | N/A | N/A | 0.02 | N/A |

*Sources: Whatcom County and Cities' Data Reporting Tools, 2022; Community Attributes, Inc., 2022.*
*Note: An N/A in the Planned Density columns indicates that the jurisdiction does not have an adopted planned density for the specific development type. An N/A in the Difference columns indicates that the difference between planned and achieved densities cannot be calculated because no planned density is available. The achieved density for the Non-UGA Areas is acres per dwelling unit.*

## Land Suitable for Development

An analysis of the developable lands inventory by UGA, deducting critical areas, future public uses, quasi-public uses, infrastructure gaps, and an assumed market factor, provides an estimate of land capacity for population and employment growth. Applying densities, occupancy rates, and other population and employment assumptions, the developable lands inventory results in an estimate of population and employment capacity to compare to the remaining population to accommodate.

Development data show that UGAs accommodated population growth of approximately 12,121 persons for the Review and Evaluation Period of 2016-

2021. The remaining forecast population growth to be accommodated for the rest of the 20-year planning period ending in 2036 is 38,690 for all UGAs (**Exhibit 6**). Based on an analysis of developable residential land capacity for the UGAs, additional population (housing) growth capacity exists to accommodate 73,075 for the period – a surplus of 34,385, or 17% beyond what is necessary (**Exhibit 12**).

While individual UGA population growth capacity surpluses range from 9% in Bellingham to 84% in Blaine, Birch Bay has a 10% deficit in capacity.

**Exhibit 12. Whatcom County Population Growth Capacity and Allocations by UGA, 2021-2036**

| UGA | 2016-2036 Population Growth Allocation | 2036 Total Population Allocation | 2036 Population Allocation Share | 2016-2021 Population Growth Estimate | 2021-2036 Remaining Population Growth | 2021-2036 Population Capacity | Surplus (Deficit) | Surplus Percent |
|---|---|---|---|---|---|---|---|---|
| Bellingham | 27,000 | 123,710 | 45% | 6,280 | 20,720 | 31,392 | 10,672 | 9% |
| Birch Bay | 4,593 | 12,822 | 5% | 389 | 4,204 | 2,950 | (1,254) | (10%) |
| Blaine | 3,838 | 9,585 | 3% | 551 | 3,287 | 11,324 | 8,037 | 84% |
| Cherry Point | 0 | 43 | 0% | 0 | 0 | 0 | 0 | 0% |
| Columbia Valley | 1,170 | 4,448 | 2% | 271 | 899 | 2,167 | 1,268 | 29% |
| Everson | 1,080 | 3,907 | 1% | 317 | 763 | 3,634 | 2,871 | 73% |
| Ferndale | 5,942 | 19,591 | 7% | 2,281 | 3,661 | 10,786 | 7,125 | 36% |
| Lynden | 5,568 | 19,275 | 7% | 1,668 | 3,900 | 8,467 | 4,567 | 24% |
| Nooksack | 861 | 2,425 | 1% | 174 | 687 | 1,283 | 596 | 25% |
| Sumas | 760 | 2,323 | 1% | 190 | 570 | 1,073 | 503 | 22% |
| **UGA Total** | **50,812** | **198,129** | **72%** | **12,121** | **38,690** | **73,075** | **34,385** | **17%** |

*Sources: Whatcom County and Cities, 2022; Community Attributes, Inc., 2021.*

For Non-UGAs (areas outside UGAs), the *Whatcom County Comprehensive Plan's* pro-rated population growth allocation for 2016-2036 equates to 9,754 more people (**Exhibit 1**). Based upon building permits and assumptions in the Data Reporting Tool, it is estimated that new development in the Non-UGAs accommodated about 2,375 people between 2016 and 2021. Therefore, these areas would need to accommodate about 7,379 more people over the remainder of the planning period from 2021-2036 (**Exhibit 6**). The County estimates that land outside UGAs can accommodate in excess of 14,000 additional dwelling units. This is more than enough capacity to accommodate population growth in these areas.

Both UGAs, which include cities, and Non-UGAs have sufficient capacity to accommodate projected population growth over the remaining portion of the planning period through the year 2036. Therefore, there is sufficient suitable land capacity to accommodate the countywide population projection set forth in the *Whatcom County Comprehensive Plan.*

UGAs accommodated estimated employment growth of approximately 5,180 jobs from 2016-2021. The remaining forecast employment growth to be accommodated for the rest of the 20-year planning period ending in 2036 is 24,216 for all UGAs (**Exhibit 7**). Based on an analysis of developable commercial and industrial land capacity for UGAs, additional employment growth capacity exists to accommodate 41,057 more jobs for the period – a surplus of 16,841, or 16% beyond what is necessary (**Exhibit 13**).

Individual UGA employment growth surpluses ranged from 3% in Bellingham to 136% in Blaine. No UGA has a deficit in capacity to accommodate employment growth for the remainder of the planning period (2021-2036).

**Exhibit 13. Whatcom County Employment Growth Capacity and Allocations by UGA, 2021-2036**

| UGA | 2016-2036 Employment Growth Allocation | 2036 Total Employment Allocation | 2036 Employment Allocation Share | 2016-2021 Employment Growth Estimate | 2021-2036 Remaining Employment Growth | 2021-2036 Employment Capacity | Surplus (Deficit) | Surplus Percent |
|---|---|---|---|---|---|---|---|---|
| Bellingham | 19,688 | 75,000 | 62% | 3,108 | 16,580 | 18,671 | 2,090 | 3% |
| Birch Bay | 474 | 1,140 | 1% | 55 | 419 | 573 | 154 | 13% |
| Blaine | 1,823 | 5,159 | 4% | 245 | 1,578 | 8,570 | 6,992 | 136% |
| Cherry Point* | 735 | 2,883 | 2% | (141) | 876 | 2,613 | 1,737 | 60% |
| Columbia Valley | 312 | 444 | 0% | 11 | 301 | 420 | 119 | 27% |
| Everson | 523 | 1,312 | 1% | 16 | 507 | 1,575 | 1,068 | 81% |
| Ferndale | 3,478 | 9,372 | 8% | 1,191 | 2,287 | 3,484 | 1,197 | 13% |
| Lynden | 1,876 | 7,103 | 6% | 622 | 1,254 | 4,038 | 2,785 | 39% |
| Nooksack | 100 | 369 | 0% | 8 | 92 | 355 | 263 | 71% |
| Sumas | 387 | 1,145 | 1% | 65 | 322 | 758 | 436 | 38% |
| **UGA Total** | **29,396** | **103,927** | **86%** | **5,180** | **24,216** | **41,057** | **16,841** | **16%** |

*Sources: Whatcom County and Cities, 2022; Community Attributes, Inc., 2021.*
**Cherry Point UGA employment estimates were developed by Western Washington University (Employment at Cherry Point, June 2021). The timeframe for the estimated employment growth, and employment growth allocation for Cherry Point is 2017-2021 and 2017-2036 to coordinate with the timeframe for the employment growth estimate. Complete data was not available for 2016 for the Cherry Point UGA.*

## Inconsistencies and Reasonable Measures

On a countywide basis, **surplus capacity exists to accommodate both remaining projected population and employment growth for the rest of the 20-year planning period through 2036**. In addition, planned residential densities in the cities are being achieved.

When planned densities are not being achieved, there is not sufficient capacity to accommodate remaining projected population or employment growth, or development patterns are not occurring as planned, Whatcom County and the cities will need to determine if reasonable measures are necessary to address the issue.

Reasonable measures should, if necessary, be selected by the jurisdiction based on the nature of the inconsistency that has occurred. The measures should be reasonably likely to increase consistency during the succeeding review and evaluation period. Once selected, reasonable measures must be adopted, as applicable, into individual County and city comprehensive plans and/or implementing regulations.

A list of potential reasonable measures that jurisdictions may consider, if needed, are documented in the *Whatcom County Review and Evaluation Program Methodology, Appendix A.* The Jurisdiction Profiles address whether reasonable measures may be needed for individual UGAs.

## Jurisdiction Profiles

This section provides detailed data and analysis on achieved and assumed future densities, as well as summaries of developable land capacity and growth capacity, by jurisdiction. Whatcom County contains ten UGAs – seven city UGAs, and three non-City UGAs (Birch Bay, Cherry Point, and Columbia Valley) – that are described in this section.

In accordance with RCW 36.70A.215(3)(e) and the *Whatcom County Review and Evaluation Program Methodology*, the Buildable Lands Report will typically use achieved densities (as measured for the Review and Evaluation period, 2016-2021) as a basis for the assumed densities for future development in the UGA over the remaining portion of the current 20-year planning period (2021-2036). If there is little or no data on achieved densities, or the achieved densities are clearly not reflective of future development that is anticipated in the UGA then, based on a review of achieved densities in comparable areas and other analysis, the local jurisdiction has developed assumptions for future development densities in the UGA.

# 1. Bellingham UGA

The Bellingham Urban Growth Area is the largest in Whatcom County, projected to encompass 123,710 residents and 75,000 employees by 2036. The UGA has growth allocations of 27,000 new residents and 19,688 new jobs between 2016 and 2036 (**Exhibit 1** and **Exhibit 2**).

**Achieved Growth 2016-2021**

Based on permit data collected between 2016 and 2021 and occupancy, persons per household, and square feet per employee assumptions, new construction in the Bellingham UGA accommodated an estimated 6,278 new residents (99% within the City of Bellingham) and 3,108 new jobs (84% within the City of Bellingham) (**Exhibit 6** and **Exhibit 7**).

Bellingham's residential growth over the past five years has occurred at higher-than-expected densities achieving an overall density of 11.5 units per acre. The *Whatcom County Land Capacity Analysis Report* referenced in the *2016 City of Bellingham Comprehensive plan* (Land Use Chapter page 31) assumed future residential growth would average 7.2 units per acre. The achieved density within the incorporated portions of the UGA falls within the planned densities of 6.0 to 24.0 units per acre adopted in the *Whatcom County Comprehensive Plan* for the City of Bellingham (**Exhibit 11**).

Development in the unincorporated portions of the Bellingham UGA achieved a residential density of 1.3 units per acre (**Exhibit 11**). This density lags planned urban densities for the City of Bellingham and is likely due to these as-yet unannexed areas lacking city zoning and complete infrastructure; instead, the unincorporated areas serve as urban growth potential for future growth after annexation, when city zoning is adopted and public water and sewer provided.

Neither the City of Bellingham or Whatcom County have adopted planned densities for commercial or industrial uses. Between 2016 and 2021, incorporated areas of the UGA achieved a commercial Floor-Area-Ratio (FAR) of 0.22, and an industrial FAR of 0.24. The unincorporated areas within the Bellingham UGA achieved slightly higher FARs of 0.26 and 0.29 for commercial and industrial uses respectively (**Exhibit 11**).

## Population Capacity 2021-2036

Based on achieved densities and regulatory changes adopted since 2016, the forward-looking evaluation of land suitable for development that estimates the growth capacity on remaining buildable lands is assuming an overall residential density of 11.2 units per acre on vacant, partially used, and underutilized lands. This aligns well with the 11.5 units per acre overall achieved density for residential development from 2016 to 2021.

City of Bellingham planners are assuming future densities ranging between 0.2 units per acre and 14.5 units per acre for single-family zones, depending on the specific zone (Zones in Bellingham's unincorporated UGA with a density of 0.2 units per acre or one dwelling per five acres are located within the Lake Whatcom Watershed and were adopted by Whatcom County for the purpose of water quality protection). Future density assumptions range between 4.0 and 69.7 units per acre for zones allowing multifamily uses (**Exhibit 14**).

The results of the analysis show the Bellingham UGA has estimated net land capacity for residential development (population growth) of 752.98 acres (**Exhibit 15**). When combined with pending projects in the development pipeline and in approved master plans these buildable lands have a total estimated occupied unit capacity of 15,531 dwelling units. Based on persons per household assumptions, these dwelling units can accommodate an estimated 31,392 new residents indicating an estimated population capacity surplus of 10,672 people (**Exhibit 16**).

## Housing Needs by Type

The Whatcom County Comprehensive Plan (Chapter 3- Housing, Chart 3 – Estimated Dwelling Units Needed, page 3-8) indicates Bellingham has a need for 5,171 single-family, 9,507 multi-family, and 1,410 other (group housing) new dwelling units during the 2013-2036 planning period.

- During the period April 1, 2013 to March 31, 2016 Bellingham completed final inspections on permits for 372 single-family and 797 multi-family housing units.
- During the period April 1, 2016 to March 31, 2021 Bellingham completed final inspections on permits for 794 new single-family and 2,393 new multi-family housing units (including 537 student housing and memory-care group housing units that would fall under the "other" category in the County housing needs chart).

- The forward-looking evaluation of land suitable for development component of Bellingham's Buildable Lands Analysis shows that the City and unincorporated UGA have an estimated 2021-2036 capacity for an additional 4,200 single-family and 11,863 multi-family housing units (**Exhibit 16**).

Combining the 2013-2016 and 2016-2021 built totals with the estimated 2021-2036 capacity results in an overall capacity of 5,366 single-family and 15,053 multi-family housing units plus 537 completed units in the "other" category. The combined single-family totals exceed the estimated need by 4% or 195 housing units (5,366 – 5,171). The combined multi-family totals exceed the estimated need by 58% or 5,546 housing units (15,053 – 9,507). And the combined overall total (single-family, multi-family, and other) exceeds the estimated need by 30% or 4,868 housing units (20,956 – 16,088). These capacities are sufficient to accommodate the dwelling units needed in the planning period as established in the *Whatcom County Comprehensive Plan* (Chapter 3- Housing, Chart 3).

**Employment Capacity 2021-2036**

Based on achieved densities and regulatory changes adopted since 2016, City of Bellingham planners are assuming future commercial FARs ranging between 0.25 and 3.50, depending on the specific zone. Assumed future industrial FARs range between 0.25 and 0.40 (**Exhibit 17**).

The results of the evaluation of land suitable for development show the Bellingham UGA has estimated net land capacity for employment growth of 377.6 acres (**Exhibit 18**). When combined with pending projects in the development pipeline and in approved master plans these buildable lands have a total estimated occupied commercial and industrial capacity of 9.8 million square feet. Based on square feet per employee assumptions, this employment space can accommodate an estimated 18,671 jobs indicating an estimated employment capacity surplus of 2,091 jobs (**Exhibit 19**).

## Analysis of Comprehensive Plan Objectives and Reasonable Measures

Over the past five years Bellingham has worked hard to implement the goals adopted in the 2016 Comprehensive Plan. As described below in the Regulatory Changes section, new development rules for land division, multi-family housing, and infill toolkit (middle) housing have expanded capacity significantly. And as documented in this report Bellingham is meeting or exceeding the development assumptions in the county-wide planning policies and the comprehensive plan. To that end, and as stated in section 5.2 of the *Whatcom County Review and Evaluation Program Methodology*, no reasonable measures are required. There is still much work to do though around housing. Like other communities in Washington and across the nation the supply of housing that is affordable to most households is small and getting smaller. Through the Home Fund Bellingham is investing over $60 million to build new and preserve existing affordable housing (over 700 units 2012-2022). The City also spends over $2 million annually in federal grant dollars to provide housing, services, and rental assistance to our community's most vulnerable members. Current work program initiatives like the manufactured home park overlay zone and funding to study inclusionary zoning also aim to preserve and expand the supply of affordable housing. Work on the 2025 Comprehensive Plan will begin in 2023 and will include a community-wide conversation around housing affordability. These efforts will be guided by the Department of Commerce recommendations for compliance with House Bill 1220 instructing local governments to "plan and accommodate" housing affordable to all income levels. Through this plan update the City will work to further develop goals and policies for preserving existing affordable housing and to carefully manage the remaining buildable land supply to prioritize housing that is affordable to the full range of Bellingham's residents.

## Analysis by Zoning Category

The following section provides details for each of Bellingham's general zoning categories of the residential densities assumed in 2016, those achieved 2016 to 2021, and those used in the forward-looking evaluation of land suitable for development that estimates the growth capacity on remaining buildable lands from 2021 to 2036.

Single family residential zones in Bellingham accommodated 566 single family and 321 multi family units for a total of 886 units and an overall achieved density of 5.3 units per acre compared to an assumed density of 4.7 units

per acre. There are 19 unique single family zones, of which 15 had growth over the past five years. Nine experienced higher than expected levels of development accommodating 160% of the growth assumed for them. Six zones fell short accommodating about 90% of assumed growth. Overall single family zones accommodated 114% of assumed growth.

Multi family residential zones accommodated 748 multi family and 149 single family units for a total of 897 units and an overall achieved density of 22.9 units per acre compared to an assumed density of 17.7 units per acre. There are 34 unique multi family zones, of which 17 had growth over the past five years. Nine experienced higher than expected levels of development accommodating 263% of the growth assumed for them. Eight zones fell short accommodating about 91% of assumed growth. Overall multi family zones accommodated 130% of assumed growth.

Commercial zones allowing and encouraging residential uses accommodated 671 multi family units for an achieved density of 20.7 units per acre compared to an assumed density of 17.8 units per acre. There are seven unique commercial zones, of which two had residential growth over the past five years. Both zones experienced higher than expected levels of development accommodating 116% of the growth assumed for them. For commercial zones allowing and encouraging residential uses the analysis continues the use of 2,500 square feet per multi family unit (Municipal Code does not specify a density) as a realistic value given the densities achieved in recent projects in these zones.

Commercial/Industrial/Residential Multi zones accommodated 154 single family and 93 multi family units for an overall achieved density of 13.1 units per acre compared to an assumed density of 7.5 units per acre. There are two unique Com/Ind/RM zones, one of which experienced residential growth over the past five years. This zone experienced higher than expected levels of development accommodating 176% of the growth assumed for it.

Urban Village zones accommodated 5 single family and 524 multi family units for an overall achieved density of 58.9 units per acre compared to an assumed density of 41.4 units per acre. There are 13 unique urban village zones, 11 of which experienced residential growth over the past five years. Ten experienced higher than expected levels of development accommodating 175% of the growth assumed for them. One zone fell short accommodating 89% of assumed growth. Overall urban village zones accommodated 142% of assumed growth. For urban village zones the analysis uses density values keyed to the floor area ratios (FARs) specified in the

Municipal Code for each urban village land use area. A table included in the evaluation of land suitable for development worksheet documents the assumptions that model allocation of building square footage to non-residential uses, parking, hallway/mechanical spaces, and residential units to translate each FAR value into a specific units per acre density. These model assumptions are based on densities achieved by recent projects in each of the urban villages.

## Background Details

The following section highlights details specific to Bellingham's application of the *Whatcom County Review and Evaluation Program Methodology* in the analysis of buildable lands. It includes the rates used to estimate population and employment, discussions of regulatory changes since 2016 that affect development capacity, infrastructure and future public uses, environmental constraints, market factors, and lands in Washington State ownership excluded from the capacity analysis.

### Population and Employment Assumptions

The housing occupancy rate and persons per household assumptions for the Bellingham UGA are based on current values from the Washington State Office of Financial Management (OFM) and are specific to Bellingham. The employment occupancy rate and jobs per square foot assumptions are based on Washington State Employment Security and Whatcom County Assessor's data as explained in Section 4.1 of the *Whatcom County Review and Evaluation Program Methodology*. The values are as follows:

- 97.5% Single Family occupancy rate
- 96.4% Multifamily occupancy rate
- 95.0% Commercial and Industrial occupancy rate
- 2.499 persons per Single Family household
- 1.850 persons per Multifamily household
- 440 and 660 respectively Commercial and Industrial square feet per employee

The Bellingham UGA has an estimated 20,720 population and 16,580 employment growth remaining to accommodate between 2021 and 2036 (**Exhibit 6** and **Exhibit 7**).

### Regulatory Changes

Since adoption of the 2016 Comprehensive Plan Bellingham has approved many

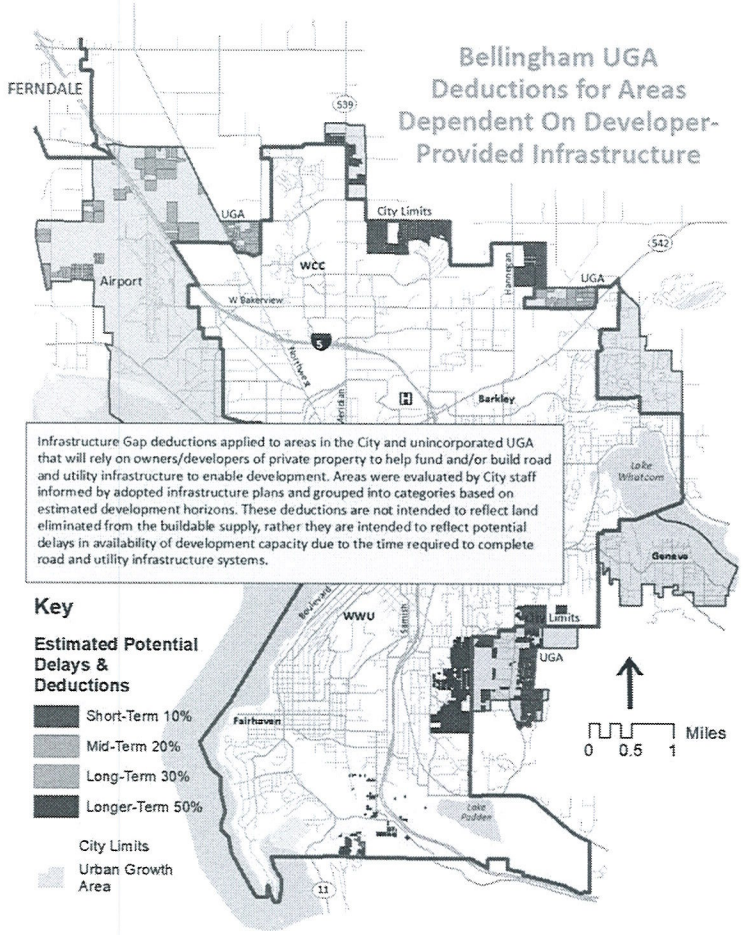
regulatory changes that impact either the amount of land available for development, or the densities and mix of uses allowed on buildable lands. These changes are documented in detail in the Data Reporting Tool worksheet. The most significant changes include a rezone for Cordata Park removing 20 acres of mixed-use land from the buildable land supply (estimated capacity of 150 jobs and 100 housing units); approval of two annexations activating development of infrastructure and allowing development on 249 acres; approval of Title 23 (subdivision ordinance) streamlining the plat process and allowing a 50% density bonus for single-family cluster zones when at least 50% of units are Infill Toolkit forms; approval of an Accessory Dwelling Unit (ADU) ordinance allowing and encouraging ADUs in Bellingham's neighborhoods; approval of an updated residential multi-family (RM) development code establishing a simplified tiered density system and minimum densities (increasing Bellingham's overall development capacity by an estimated 20%); and Phase I of an update to the Infill Toolkit regulations streamlining and clarifying the development of missing-middle housing forms.

Infrastructure and Future Public Uses

Bellingham has identified areas within the City and unincorporated UGA that are within the service area for urban sewer utilities but may not achieve full buildout until after 2036 due to reliance upon developer-provided portions of these future utility systems. The areas identified based on mapping from the 2016 Bellingham Wastewater Conveyance Plan were also determined to be areas where development of other related infrastructure like roads and municipal water would likely depend on some level of developer participation. These areas were assigned estimated near-term, mid-term, long-term, or longer-term time frames and received associated percentage deductions of their developable area. The deductions total approximately 112 acres and do not preclude all development but acknowledge that full buildout may not occur until after 2036. This jurisdiction profile includes a map of the Bellingham UGA illustrating the land areas associated with these deductions.

Deductions of buildable land related to roads, and water, sewer, and storm utilities are accounted for in the methodology through an infrastructure deduction on vacant, partially-used, and underutilized land of between 5% and 24%. The recent 17-acre land acquisition by the Bellingham School District for a future elementary school is also removed from the buildable land supply. Future development on the three college campuses in Bellingham is

accounted for in the "master planned" category of buildable land based on the adopted Institutional Master Plan (IMP) for each institution. Deductions for future public uses were made from the developable land supply based primarily on land acquisition needs identified in the Bellingham 2020 Park, Recreation, and Open Space (PRO) Plan. A total of 104 acres was deducted from developable vacant land for these purposes (see 2020 PRO Plan, Table 4.6.1 "Proposed Park System Additions – City & UGA").


Bellingham UGA
Deductions for Areas
Dependent On Developer-
Provided Infrastructure
FERNDALE
539
UGA
City Limits
542
WCC
Airport
W Bakerview
Lakeway
UGA
5
Barkley
Infrastructure Gap deductions applied to areas in the City and unincorporated UGA that will rely on owners/developers of private property to help fund and/or build road and utility infrastructure to enable development. Areas were evaluated by City staff informed by adopted infrastructure plans and grouped into categories based on estimated development horizons. These deductions are not intended to reflect land eliminated from the buildable supply, rather they are intended to reflect potential delays in availability of development capacity due to the time required to complete road and utility infrastructure systems.
Lake Whatcom
Geneva
Key
Estimated Potential Delays & Deductions
Short-Term 10%
Mid-Term 20%
Long-Term 30%
Longer-Term 50%
City Limits
Urban Growth Area
WWU
Limits
UGA
Fairhaven
Lake Padden
11
Miles
0 0.5 1

Environmental Constraints

Deductions for environmental constraints (critical areas) were made to all developable land including ALL residential, commercial, and industrial zones. Deductions were based on the best-available data in the City's GIS system following criteria set out in Bellingham Municipal Code (BMC) Chapter 16.55. Wetlands were buffered with 150-foot buffers based on a composite of all mapped wetland delineations, and wetland reconnaissance inventories from 2015, 2003, and 1992 (NWI data from the 1980's was not used due to the relatively complete coverage by more recent/accurate studies). In addition, a staff-generated potential wetlands layer was created from color-infrared imagery and LiDAR data to fill gaps across properties where access limitations prevent on-the-ground mapping of wetland systems. Other critical areas layers used include steep slopes, FEMA floodways and floodplains (2019 data), and regulated shorelines and stream/riparian corridors. Shorelines were buffered using adopted Shoreline Master Program (SMP) development setbacks designated for each reach. Stream/riparian buffers were based on distances specified for each reach in BMC Table 16.55.500(A).

Market Factors

The Review and Evaluation Program Methodology includes a market factor deduction to account for land not likely to develop during the remainder of the 2021 to 2036 planning period. The criteria considered while developing the market factor(s) for Bellingham's buildable lands analysis include examination of improvement to total value ratios, transaction and conversion history, a property owner survey, targeted outreach to specific owners and developers, and comparative studies of market factors from other buildable lands jurisdictions. The market factors developed for Bellingham's analysis are arranged in a tiered system corresponding to the complexities involved in development and the relative return or benefit to property owners and developers. Vacant land usually presents the fewest challenges to development, partially-utilized land is typically more complex to develop due to existing ongoing uses on the property during development, and underutilized land is often the most-complex due to the requisite re-location or change of non-conforming uses accompanying redevelopment. The relative return or benefit to property owners and developers is closely related to the zoned density or intensity of developable land. Land zoned for higher density or intensity uses will

usually provide a bigger return or benefit to owners and developers making it more likely they will develop sooner. And land zoned for lower density or intensity uses will usually provide a lower return or benefit to owners making it less likely to develop sooner. The market factors assigned to each tier are as follows: vacant higher density/intensity = 20%, vacant lower density/intensity = 25%, partially-utilized higher density/intensity = 25%, partially-utilized lower density/intensity = 30%, underutilized higher density/intensity = 30%, underutilized lower density/intensity = 35%. A technical memo explaining the details of Bellingham's market factor analysis can be found here https://maps.cob.org/resources/images/pcd/BellinghamMarketFactor_TechnicalMemo_Sept10th2021.pdf

State-Owned Lands

The 2016 Bellingham Comprehensive Plan Land Capacity Analysis included some development capacity on approximately 266 acres of land owned by Washington State. This land located in one block west of Bellingham International Airport, and in three blocks lying north of and parallel to the Mt Baker Highway has been excluded from the developable land supply in this analysis.

**Exhibit 14. Residential Development, Achieved and Assumed Densities, City of Bellingham, 2016-2021**

| Zoning Category | Development Type | Acres Developed | Dwelling Units | Achieved Density (Units/Acre) | Density Assumed (Units/Acre) | |
|---|---|---|---|---|---|---|
| | | | | | Min | Max |
| Single Family | Single Family | 138.2 | 586 | 4.24 | 0.20 | 14.52 |
| | Multifamily | 29.9 | 321 | 10.74 | 7.26 | 7.26 |
| Multifamily | Single Family | 20.1 | 149 | 7.40 | N/A | N/A |
| | Multifamily | 32.2 | 748 | 23.25 | 4.04 | 43.56 |
| Mixed-Use | Single Family | 28.5 | 169 | 5.93 | 6.00 | 6.00 |
| | Multifamily | 3.3 | 93 | 28.24 | 6.00 | 17.42 |
| Urban Village | Single Family | 0.5 | 5 | 9.96 | 8.71 | 8.71 |
| | Multifamily | 8.7 | 524 | 59.93 | 8.71 | 69.70 |
| Commercial | Multifamily | 20.6 | 671 | 32.55 | 12.10 | 48.40 |
| Institutional | Multifamily | 1.5 | 76 | 50.97 | N/A | N/A |
| Industrial | Multifamily | 0.2 | 1 | 6.19 | N/A | N/A |

*Sources: City of Bellingham, 2022; Community Attributes Inc., 2021.*
*Note: "Density Assumed" is the assumed density for evaluation of land suitable for development by zone. City of Bellingham zoning districts are grouped into seven collapsed, generalized categories.*

## Exhibit 15. Residential Land Supply, Bellingham UGA, 2021-2036

| | UGA Total | Single Family | Multifamily | Mixed-Use | Urban Village | Commercial | Institutional | Industrial | Public | Airport Operations |
|---|---|---|---|---|---|---|---|---|---|---|
| **Vacant Land** | | | | | | | | | | |
| Gross Acres | 1,291.19 | 802.97 | 322.52 | 119.16 | 2.94 | 41.41 | 2.19 | 0.00 | 0.00 | 0.00 |
| Critical Areas | 688.47 | 426.50 | 183.11 | 48.51 | 0.52 | 27.81 | 2.02 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 63.66 | 39.59 | 15.90 | 5.87 | 0.14 | 2.04 | 0.11 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 55.48 | 41.84 | 8.74 | 4.89 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 24.18 | 14.75 | 5.74 | 2.99 | 0.11 | 0.58 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Deduction | 97.79 | 70.81 | 11.48 | 14.22 | 0.11 | 1.16 | 0.01 | 0.00 | 0.00 | 0.00 |
| Market Factor | 75.72 | 45.29 | 19.51 | 8.53 | 0.41 | 1.96 | 0.01 | 0.00 | 0.00 | 0.00 |
| **Net Acres** | **285.91** | **164.20** | **78.04** | **34.14** | **1.64** | **7.86** | **0.05** | **0.00** | **0.00** | **0.00** |
| **Partially-Used Land** | | | | | | | | | | |
| Gross Acres | 1,378.76 | 845.05 | 141.46 | 321.62 | 53.25 | 17.39 | 0.00 | 0.00 | 0.00 | 0.00 |
| Critical Areas | 567.27 | 421.40 | 49.59 | 84.38 | 4.89 | 7.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 23.84 | 8.42 | 0.40 | 15.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 39.38 | 20.76 | 4.57 | 11.11 | 2.42 | 0.52 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Deduction | 165.59 | 99.65 | 9.15 | 53.34 | 2.42 | 1.04 | 0.00 | 0.00 | 0.00 | 0.00 |
| Market Factor | 149.18 | 77.22 | 19.44 | 39.45 | 10.88 | 2.21 | 0.00 | 0.00 | 0.00 | 0.00 |
| **Net Acres** | **433.50** | **217.59** | **58.31** | **118.34** | **32.64** | **6.62** | **0.00** | **0.00** | **0.00** | **0.00** |
| **Underutilized Land** | | | | | | | | | | |
| Gross Acres | 69.84 | 0.00 | 25.64 | 1.15 | 29.40 | 9.92 | 3.72 | 0.00 | 0.00 | 0.00 |
| Critical Areas | 14.96 | 0.00 | 8.29 | 0.02 | 0.81 | 2.65 | 3.18 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 2.72 | 0.00 | 0.87 | 0.06 | 1.43 | 0.36 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Deduction | 4.22 | 0.00 | 1.73 | 0.27 | 1.43 | 0.73 | 0.05 | 0.00 | 0.00 | 0.00 |
| Market Factor | 14.38 | 0.00 | 4.42 | 0.24 | 7.72 | 1.85 | 0.15 | 0.00 | 0.00 | 0.00 |
| **Net Acres** | **33.56** | **0.00** | **10.32** | **0.56** | **18.01** | **4.32** | **0.34** | **0.00** | **0.00** | **0.00** |

*Sources: City of Bellingham, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*
*Note: City of Bellingham zoning districts are grouped into nine collapsed, generalized categories.*

## Exhibit 16. Developable Residential Land Capacity, Bellingham UGA, 2021-2036

| | UGA | Multi-family | Single-family | Mixed-Use | Urban Village | Commercial | Institutional | Industrial | Public | Airport Operations |
|---|---|---|---|---|---|---|---|---|---|---|
| **Net Developable Residential Acres (Vacant, PU, UU)** | **752.98** | **381.79** | **146.67** | **153.03** | **52.29** | **18.80** | **0.39** | **0.00** | **0.00** | **0.00** |
| **Single Family Developable Acres** | 485.56 | 374.47 | - | 110.00 | 1.09 | - | - | - | - | - |
| Assumed Single Family Density (units/acre) | | | | | | | | | | |
| Subtotal Single Family Unit Capacity | 2,994 | 2,325 | - | 660 | 9 | - | - | - | - | - |
| Existing Single Family Units | 1,646 | 419 | 370 | 314 | 366 | 28 | 1 | 146 | - | 2 |
| Pending Single Family Units | 1,872 | 1,164 | 505 | 123 | 14 | 65 | - | - | 1 | - |
| Master Planned Single Family Units | 75 | - | - | 58 | - | - | - | 17 | - | - |
| Subtotal: Net Single Family Unit Capacity | 4,200 | 3,070 | 505 | 527 | 15 | 65 | - | 17 | 1 | - |
| Potential Occupied Single Family Units | 4,095 | 2,993 | 492 | 514 | 15 | 63 | - | 16 | 1 | - |
| Single Family Population Capacity | 10,233 | 7,480 | 1,230 | 1,285 | 37 | 158 | - | 41 | 2 | - |
| **Multifamily Developable Acres** | 267.42 | 7.32 | 146.67 | 43.03 | 51.20 | 18.80 | 0.39 | - | - | - |
| Assumed Multifamily Density (units/acre) | | | | | | | | | | |
| Subtotal Multifamily Unit Capacity | 5,544 | 65 | 2,791 | 420 | 1,842 | 411 | 15 | - | - | - |
| Existing Multifamily Units | 122 | 27 | 25 | 20 | 20 | 10 | - | 20 | - | - |
| Pending Multifamily Units | 4,903 | 124 | 927 | 758 | 1,477 | 1,617 | - | - | - | - |
| Master Planned Multifamily Units | 1,492 | - | - | 413 | 760 | - | 200 | 119 | - | - |
| Subtotal: Net Multifamily Unit Capacity | 11,863 | 189 | 3,693 | 1,571 | 4,059 | 2,018 | 215 | 119 | - | - |
| Potential Occupied Multifamily Units | 11,436 | 182 | 3,560 | 1,514 | 3,913 | 1,945 | 207 | 115 | - | - |
| Multifamily Population Capacity | 21,159 | 338 | 6,586 | 2,801 | 7,239 | 3,599 | 384 | 212 | - | - |
| Net Dwelling Unit Capacity | 16,063 | 3,259 | 4,198 | 2,098 | 4,074 | 2,083 | 215 | 135 | 1 | - |
| Potential Occupied Dwelling Units | 15,531 | 3,175 | 4,052 | 2,028 | 3,928 | 2,009 | 207 | 131 | 1 | - |
| **Population Capacity** | **31,392** | **7,818** | **7,816** | **4,086** | **7,276** | **3,757** | **384** | **253** | **2** | **-** |
| Remaining Population Growth to Accommodate (2021-2036) | 20,720 | | | | | | | | | |
| **Population Capacity Surplus (Deficit)** | **10,672** | | | | | | | | | |

*Sources: City of Bellingham, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*
*Note: Bellingham UGA zoning districts are grouped into nine collapsed, generalized categories.*

## Commercial and Industrial Development

**Exhibit 17. Nonresidential Development, Achieved and Assumed Densities, City of Bellingham, 2016-2021**

| Zoning Designation | Development Type | Acres Developed | Built Square Feet | Achieved Density (FAR) | Assumed Density (FAR) | |
|---|---|---|---|---|---|---|
| | | | | | Min | Max |
| Single Family | Commercial | 7.6 | 22,776 | 0.07 | N/A | N/A |
| Multifamily | Commercial | 1.4 | 17,966 | 0.28 | N/A | N/A |
| Mixed-Use | Commercial | 21.7 | 230,519 | 0.24 | 0.40 | 0.40 |
| | Industrial | 0.0 | 0 | 0.00 | 0.40 | 0.40 |
| Urban Village | Commercial | 3.1 | 81,619 | 0.61 | 0.40 | 3.50 |
| | Industrial | 2.4 | 58,710 | 0.57 | 0.40 | 0.40 |
| Commercial | Commercial | 10.8 | 189,313 | 0.40 | 0.40 | 2.50 |
| Institutional | Commercial | 12.3 | 188,774 | 0.35 | 0.40 | 0.40 |
| Industrial | Commercial | 12.0 | 155,697 | 0.30 | N/A | N/A |
| | Industrial | 45.2 | 466,052 | 0.24 | 0.25 | 0.25 |
| Public | Commercial | 50.2 | 323,042 | 0.15 | 0.40 | 0.40 |
| | Industrial | 1.4 | 9,309 | 0.15 | N/A | N/A |
| Airport Operations | Commercial | 8.2 | 149,046 | 0.42 | 0.25 | 0.25 |
| | Industrial | 0.0 | 0 | 0.00 | 0.25 | 0.25 |

*Sources: City of Bellingham, 2022; Community Attributes Inc., 2021.*
*Note: Assumed Density is the assumed density for evaluation of land suitable for development by zone. Bellingham UGA zoning districts are grouped into nine collapsed, generalized categories.*

## Exhibit 18. Developable Nonresidential Land Supply, Bellingham UGA, 2021-2036

| | UGA Total | Single Family | Multifamily | Mixed-Use | Urban Village | Commercial | Institutional | Industrial | Public | Airport Operations |
|---|---|---|---|---|---|---|---|---|---|---|
| **Vacant Land** | | | | | | | | | | |
| Gross Acres | 819.40 | 0.00 | 0.07 | 24.40 | 3.38 | 41.61 | 6.58 | 743.27 | 0.08 | 0.00 |
| Critical Areas | 562.80 | 0.00 | 0.05 | 10.32 | 0.23 | 27.81 | 6.07 | 518.24 | 0.08 | 0.00 |
| Future Public Uses | 40.40 | 0.00 | 0.00 | 1.20 | 0.17 | 2.05 | 0.32 | 36.64 | 0.00 | 0.00 |
| Infrastructure Gaps | 22.55 | 0.00 | 0.00 | 0.54 | 0.00 | 0.00 | 0.00 | 22.01 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 1.35 | 0.00 | 0.00 | 0.62 | 0.15 | 0.59 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Deduction | 20.13 | 0.00 | 0.00 | 2.15 | 0.15 | 1.18 | 0.02 | 16.64 | 0.00 | 0.00 |
| Market Factor | 34.43 | 0.00 | 0.00 | 1.91 | 0.54 | 2.00 | 0.03 | 29.95 | 0.00 | 0.00 |
| **Net Acres** | **137.73** | **0.00** | **0.01** | **7.66** | **2.15** | **7.99** | **0.14** | **119.79** | **0.00** | **0.00** |
| **Partially-Used Land** | | | | | | | | | | |
| Gross Acres | 359.15 | 0.00 | 0.24 | 35.74 | 25.13 | 17.52 | 0.00 | 279.05 | 0.00 | 1.48 |
| Critical Areas | 146.67 | 0.00 | 0.09 | 9.38 | 2.92 | 7.00 | 0.00 | 126.77 | 0.00 | 0.52 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 10.20 | 0.00 | 0.00 | 1.67 | 0.00 | 0.00 | 0.00 | 8.53 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 2.88 | 0.00 | 0.01 | 1.23 | 1.11 | 0.53 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Deduction | 22.57 | 0.00 | 0.02 | 5.93 | 1.11 | 1.05 | 0.00 | 14.38 | 0.00 | 0.10 |
| Market Factor | 44.21 | 0.00 | 0.03 | 4.38 | 5.00 | 2.23 | 0.00 | 32.34 | 0.00 | 0.22 |
| **Net Acres** | **132.62** | **0.00** | **0.10** | **13.15** | **14.99** | **6.70** | **0.00** | **97.03** | **0.00** | **0.65** |
| **Underutilized Land** | | | | | | | | | | |
| Gross Acres | 444.57 | 0.00 | 0.03 | 0.13 | 3.74 | 10.70 | 3.72 | 426.24 | 0.00 | 0.00 |
| Critical Areas | 273.85 | 0.00 | 0.00 | 0.00 | 0.13 | 2.65 | 3.18 | 267.88 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 0.59 | 0.00 | 0.00 | 0.01 | 0.18 | 0.40 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Deduction | 16.91 | 0.00 | 0.00 | 0.03 | 0.18 | 0.81 | 0.05 | 15.84 | 0.00 | 0.00 |
| Market Factor | 45.97 | 0.00 | 0.01 | 0.03 | 0.97 | 2.05 | 0.15 | 42.76 | 0.00 | 0.00 |
| **Net Acres** | **107.25** | **0.00** | **0.02** | **0.06** | **2.27** | **4.79** | **0.34** | **99.77** | **0.00** | **0.00** |

*Sources: City of Bellingham, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*
*Note: Bellingham UGA zoning districts are grouped into nine collapsed, generalized categories.*

## Exhibit 19. Developable Nonresidential Land Capacity, Bellingham UGA, 2021-2036

| | UGA | Multi-family | Single-family | Mixed-Use | Urban Village | Commercial | Institutional | Industrial | Public | Airport Operations |
|---|---|---|---|---|---|---|---|---|---|---|
| **Net Developable Employment Acres (Vacant, PU, UU)** | **377.60** | **0.00** | **0.13** | **20.87** | **19.41** | **19.48** | **0.48** | **316.59** | **0.00** | **0.65** |
| **Commercial Developable Acres** | 54.06 | - | 0.13 | 18.89 | 14.75 | 19.48 | 0.48 | - | - | 0.32 |
| Subtotal: Commercial Capacity (SF) | 2,330,253 | - | 2,203 | 329,224 | 1,400,226 | 586,709 | 8,373 | - | - | 3,518 |
| Existing Commercial Space (SF) | 716,719 | 4,287 | 5,423 | - | 422,903 | 224,113 | - | 59,993 | - | - |
| Pending Commercial Space (SF) | 1,095,040 | 78,100 | 6,933 | 26,239 | 140,669 | 268,607 | 11,813 | 463,912 | 98,767 | - |
| Master Planned Commercial Space (SF) | 2,528,209 | - | - | 210,603 | 617,200 | - | 1,294,730 | 39,397 | 266,279 | 100,000 |
| Subtotal: Net Commercial Capacity (SF) | 5,346,344 | 78,100 | 9,136 | 566,066 | 1,775,050 | 631,203 | 1,314,916 | 503,309 | 365,046 | 103,518 |
| Potential Occupied Commercial Space (SF) | 5,079,027 | 74,195 | 8,679 | 537,763 | 1,686,297 | 599,643 | 1,249,170 | 478,144 | 346,793 | 98,342 |
| Commercial Employment Capacity | 11,542 | 168 | 20 | 1,222 | 3,832 | 1,362 | 2,839 | 1,087 | 788 | 224 |
| **Industrial Developable Acres** | 323.54 | - | - | 1.97 | 4.66 | - | - | 316.59 | - | 0.32 |
| Subtotal: Industrial Capacity (SF) | 3,566,662 | - | - | 34,347 | 81,132 | - | - | 3,447,665 | - | 3,518 |
| Existing Industrial Space (SF) | 871,274 | 79,196 | 26,762 | 5,496 | 135,082 | 81,437 | - | 543,301 | - | - |
| Pending Industrial Space (SF) | 1,016,738 | - | - | - | 28,382 | 45,000 | - | 912,841 | 30,515 | - |
| Master Planned Industrial Space (SF) | 981,055 | - | - | 77,213 | 376,000 | - | - | 172,841 | - | 355,000 |
| Subtotal: Net Industrial Capacity (SF) | 4,952,113 | - | - | 111,560 | 416,473 | 45,000 | - | 3,990,046 | 30,515 | 358,518 |
| Potential Occupied Industrial Space (SF) | 4,704,507 | - | - | 105,982 | 395,649 | 42,750 | - | 3,790,544 | 28,989 | 340,592 |
| Industrial Employment Capacity | 7,129 | - | - | 161 | 599 | 65 | - | 5,743 | 44 | 516 |
| Net Commercial & Industrial Capacity (SF) | 10,298,457 | 78,100 | 9,136 | 677,626 | 2,191,523 | 676,203 | 1,314,916 | 4,493,355 | 395,561 | 462,036 |
| Potential Occupied Commercial & Industrial Capacity (SF) | 9,783,534 | 74,195 | 8,679 | 643,745 | 2,081,947 | 642,393 | 1,249,170 | 4,268,688 | 375,783 | 438,934 |
| Employment Capacity | **18,671** | **168** | **20** | **1,383** | **4,431** | **1,427** | **2,839** | **6,830** | **832** | **740** |
| Remaining Employment Growth to Accommodate (2021-2036) | 16,580 | | | | | | | | | |
| **Employment Capacity Surplus (Deficit)** | **2,091** | | | | | | | | | |

*Sources: City of Bellingham, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*
*Note: Bellingham UGA zoning districts are grouped into nine collapsed, generalized categories.*

## 2. Birch Bay UGA

The Birch Bay Urban Growth Area is one of three Non-City UGAs in Whatcom County. The UGA has a projected total allocation of 12,822 residents and 1,140 jobs by 2036. The UGA has a projected growth allocation of 4,593 new residents and 474 new jobs between 2016 and 2036 (**Exhibit 1** and **Exhibit 2**).

### Achieved Growth 2016-2021

Based on permit data collected between 2016 and 2021, occupancy, persons per household and square feet per employee assumptions, new construction in the Birch Bay UGA accommodated an estimated 389 new residents and 55 new jobs over this five-year period (**Exhibit 6** and **Exhibit 7**).

The Birch Bay UGA achieved an overall residential density of 4.5 units per net acre between 2016 and 2021. This is below the 5.0 to 10.0 units per net acre planned in the *Whatcom County Comprehensive Plan* (**Exhibit 11**).

The *Whatcom County Comprehensive Plan* does not have adopted planned densities for commercial or industrial uses. Between 2016 and 2021, the UGA has achieved a commercial FAR of 0.06. The Commercial FAR is based upon a limited number of commercial building permits (eight) issued between April 1, 2016 and March 31, 2021. Six of the eight building permits were in commercial zones (the other two were in residential zones). Five of the six permits in commercial zones were for commercial storage buildings (the other was for a covered patio). The UGA did not have industrial development between 2016 and 2021 (**Exhibit 11**).

### Population and Employment Assumptions

Occupancy rate and population and employment assumptions for estimating future growth capacity in the Birch Bay UGA are:

- 75.0% Single Family occupancy rate
- 51.0% Multifamily occupancy rate
- 95.0% Commercial and Industrial occupancy rate
- 2.38 Single Family persons per household
- 2.22 Multifamily persons per household
- 532 Commercial square feet per employee

The Birch Bay UGA is characterized by a mix of single family and multifamily residences, as well as historically high seasonal housing. There are also a number of businesses in the UGA.

## Population Capacity 2021-2036

The Birch Bay UGA will need to accommodate 4,204 more residents and 419 more jobs between 2021 and 2036 under current planning assumptions (**Exhibit 6** and **Exhibit 7**).

Based on achieved densities between 2016 and 2021 and other planning assumptions, Whatcom County is assuming future densities ranging between 4.4 units per acre and 10.0 units per acre for single family development, depending on the specific zone. Future density assumptions range between 5.9 and 17.0 units per acre for multifamily development (**Exhibit 20**). Density assumptions for the Suitable Land Tool, which estimates future development capacity, are further described below (achieved density is based on building permits issued between 2016 and 2021):

Urban Residential (UR4) – The achieved net density from the Data Reporting Tool for the UR4 zone is 4.4 units/acre for single family development. This net density is used in the Suitable Land Tool to estimate capacity to accommodate development in the future.

Urban Residential Medium Density (URM6) – For single family, the achieved net density from the Data Reporting Tool for the URM6 zone is 3.3 units/acre. However, this is likely not reflective of future development. While there is currently not a minimum density in the URM6, the County Comp Plan encourages development at 5-10 units per acre in the Birch Bay UGA. For multi-family, the achieved net density from the Data Reporting Tool for the URM6 zone is 5.9 units/acre. This density is used in the Suitable Land Tool for both single family and multi-family land.

Urban Residential Medium Density (URM24) – The URM24 zone did not experience any residential development from 2016-2021 (see Data Reporting Tool). The URM24 zone has a minimum net density of 10 dwelling units/acre and a maximum gross density of 24 dwellings/acre (WCC 20.22.252). A density of 10 units per net acre is used for single family land and 17 units per net acre for multi-family land in the Suitable Land Tool.

Resort Commercial (RC) –For single family, the achieved net density from the Data Reporting Tool for the RC zone is 8.3 units/acre. This density is used in the Suitable Land Tool for future single family development. The RC zone did not experience any multi-family residential development from 2016-2021 (see Data Reporting Tool). The RC zone allows multi-family zoning at a maximum gross density of 22 units per acre (WCC 20.64.262). A density of 17 units per net acre

for multi-family development is used in the Suitable Land Tool (same as the URM24 zone).

General Commercial (GC) - The GC zone did not experience any residential development from 2016-2021 (see Data Reporting Tool). Therefore, the achieved density for the RC zone (8.3 units/net acre) is used in the Suitable Land Tool for single family land in the GC zone. The GC zone allows multi-family zoning at a maximum density of 18 units per acre (WCC 20.62.066). A density of 17 units per net acre is used for multi-family development in the Suitable Land Tool (same as URM24 and RC zones).

The Birch Bay UGA has estimated net land capacity for population growth of about 297 acres (**Exhibit 21**), with a total estimated potential occupied unit capacity of 1,257 dwelling units. Based on persons per household assumptions, the Birch Bay UGA has an estimated population capacity of 2,950, indicating an estimated population capacity deficit of 1,254 for the 2021-2036 time period (**Exhibit 22**).

## Housing Needs by Type

The *Whatcom County Comprehensive Plan* (Chapter 3- Housing, Chart 3 – Estimated Dwelling Units Needed, page 3-8) indicates that the Birch Bay UGA has a need for 3,106 new single-family dwelling units during the 2013-2036 planning period (the Comprehensive Plan does not estimate multifamily housing needs for Birch Bay). The calculation for Chart 3 in the *Whatcom County Comprehensive Plan* included building activity from 2013. Therefore, the analysis below includes permit data from April 1, 2013, even though the planning period for this Buildable Lands Report is from 2016.

- Between April 1, 2013 and March 31, 2021, Whatcom County performed final inspections on 304 single-family and 39 multi-family units in the Birch Bay UGA. Comparing units built and the needs indicated on Chart 3, the Birch Bay UGA needs an additional 2,802 single-family units between 2021 and 2036.

- The Birch Bay UGA has an estimated 2021-2036 capacity for 1,333 single-family and 504 multi-family housing units (**Exhibit 22).**

The capacity to accommodate single family residential housing in the Birch Bay UGA is not sufficient to accommodate the single family dwelling units needed in the planning period as established in the *Whatcom County Comprehensive Plan* (Chapter 3- Housing, Chart 3).

## Employment Capacity 2021-2036

Whatcom County is using an average of the small city FARs for future commercial development, since there are limited data on achieved densities in the Birch Bay UGA (**Exhibit 23**).

The Birch Bay UGA has estimated net land capacity for employment growth of 44.3 acres (**Exhibit 24**), with a total estimated potential occupied commercial capacity of 305,008 square feet. Based on square feet per employee assumptions, the Birch Bay UGA has an estimated employment capacity of 573, indicating an estimated employment capacity surplus of 154 for the 2021-2036 time period (**Exhibit 25**).

## Regulatory Changes

The County has evaluated development regulations adopted in the review period (April 1, 2016 – March 31, 2021). Only Ordinance 2019-005 could prevent assigned densities from being achieved or impact the quantity of land suitable for development in the remainder of the 20-year planning period (2021-2036). In an e-mail of October 6, 2021, a representative of the Whatcom County Public Works River & Flood Division stated:

> . . . the 2019 revisions were done mainly to reflect updated flood study and the most recent just adopted in 2021 was for compliance with building freeboard required for CRS [Community Rating System] credit, nothing to do with 'supply of land'. That being said, the flood study did change the Base Flood Elevations and floodplain boundaries in those areas and the FEMA Biological Opinion does restrict density in the floodplain. . ."

A September 30, 2021 River & Flood Division memo attached to the e-mail states that the Special Flood Hazard Area is:

> . . . designated Critical Area and/or Habitat Conservation Area (HCA) per WCC Title-16. As such, creating additional 'buildable' lots within a Critical Area or HCA may be prohibited. For further information reference WCC 16.16.420 – Frequently Flooded Areas. . .

Pursuant to the *Whatcom County Review and Evaluation Program Methodology*, Whatcom County deducted floodplains from the buildable land supply.

## Infrastructure Gaps

Whatcom County has reviewed capital facility plans and/or consulted with service providers. Based upon these actions, the County has not identified any infrastructure gaps that would prevent service providers from supplying planned capital facilities to developable land in the Birch Bay UGA within the planning period (2021-2036).

## Analysis of Comprehensive Plan Objectives and Reasonable Measures

Residential development in the Birch Bay UGA between 2016 and 2021 has occurred at an overall net density less than anticipated in the *Whatcom County Comprehensive Plan*. Additionally, there is not enough capacity in the Birch Bay UGA, with current density assumptions, to accommodate the projected residential growth in the remaining portion of the planning period (between 2021 and 2036). The single family unit capacity in the Birch Bay UGA is insufficient to accommodate the estimated dwelling units needed between 2021 and 2036. Therefore, reasonable measures are appropriate.

*Whatcom County Comprehensive Plan* Goal 2P states:

> . . . The County should approve new residential developments at overall average net densities as shown below, while respecting unique characteristics of each community:
>
> - Birch Bay – five to ten units per net acre. . .

The overall achieved residential density in the Birch Bay UGA was 4.5 units per net acre during the review period (2016-2021). Lots in the Birch Bay UGA have historically been created at densities that the land owner or developer chose. The UR4 zone has a minimum net density of 4 dwelling units/acre, but this is below the Comprehensive Plan goal of five to ten units per net acre. Several other zones in the UGA do not have minimum density requirements. Increasing residential density, including density in zones that allow single family dwellings, would provide additional capacity for growth within the UGA. Therefore, adjustments to the zoning code are appropriate to better implement the Comprehensive Plan.

The Growth Management Act indicates that one of the purposes of the review and evaluation program is to:

> Identify reasonable measures, other than adjusting urban growth areas, that will be taken to comply with the requirements of this chapter. Reasonable measures are those actions necessary to reduce the differences between growth and development assumptions and targets contained in the countywide planning policies and the county and city comprehensive plans with actual development patterns. . . (RCW 36.70A.215(1)(b)).

The *Whatcom County Review and Evaluation Program Methodology* (February 10, 2022) identifies minimum density requirements and maximum lot sizes as potential reasonable measures (Appendix A). Specifically, the Methodology states:

> Zoning ordinances can establish minimum and maximum densities in each zone to ensure that development occurs as envisioned for the community (page 46).

The State Department of Commerce *Housing Memorandum: Issues Affecting Housing Availability and Affordability* (June 2019) identifies "Reasonable Measures as Tools for Increasing Housing Availability and Affordability" including:

> Allow or require small lots (5,000 square feet or less) for single-family neighborhoods within UGAs. Small lots limit sprawl, contribute to the more efficient use of land, and promote densities that can support transit. Small lots also provide expanded housing ownership opportunities to broader income ranges and provide additional variety to available housing types (page 116).

In October 2021, Whatcom County adopted a reasonable measure increasing the allowed density in the UR4 zone in the Birch Bay UGA, if public water and sewer are available and density credits are purchased, from 4 dwellings/acre to 5 dwellings per acre (Ordinance 2021-059). This ordinance also reduced the conventional minimum lot size for residential development in the UR4 zone in the Birch Bay UGA from 8,000 square feet to 4,500 square feet when public water and sewer are available. In November 2017, Whatcom County adopted an ordinance allowing increased density for single family development in the RC zone through the planned unit development process, if density credits are purchased (Ordinance 2017-062). Other potential reasonable measures the County may consider for the Birch Bay UGA include:

- Increasing the minimum net residential density and/or adopting maximum lot size in the UR4 zone (WCC 20.20);
- Adopting minimum net residential density requirements and/or maximum lot size in the URM6 zone (WCC 20.22);
- Adopting minimum net residential density requirements and/or maximum lot size in the GC zone (WCC 20.62); and/or
- Adopting minimum net residential density requirements and/or maximum lot size in the RC zone (WCC 20.64).

The UR4, URM6, GC, and RC zones all allow single family dwelling units.

## Residential Development

**Exhibit 20. Residential Development, Achieved and Assumed Densities, Birch Bay UGA, 2016-2021**

| Zoning Designation | Development Type | Acres Developed | Dwelling Units | Achieved Density (Units/Acre) | Density Assumed (Units/Acre) |
|---|---|---|---|---|---|
| UR4 | Single Family | 38.3 | 168 | 4.39 | 4.39 |
| URM6 | Single Family | 7.6 | 25 | 3.31 | 5.89 |
| | Multifamily | 4.6 | 27 | 5.89 | 5.89 |
| URM24 | Single Family | N/A | N/A | N/A | 10.00 |
| | Multifamily | N/A | N/A | N/A | 17.00 |
| RC | Single Family | 1.4 | 12 | 8.32 | 8.32 |
| | Multifamily | N/A | N/A | N/A | 17.00 |
| GC | Single Family | N/A | N/A | N/A | 8.32 |
| | Multifamily | N/A | N/A | N/A | 17.00 |

*Sources: Whatcom County, 2022; Community Attributes Inc., 2021.*
*Note: "Density Assumed" is the assumed density for evaluation of land suitable for development by zone.*

## Exhibit 21. Residential Land Supply, Birch Bay UGA, 2021-2036

| | UGA Total | UR4 | URM6 | URM24 | RC | GC | NC |
|---|---|---|---|---|---|---|---|
| **Vacant Land** | | | | | | | |
| Gross Acres | 816.99 | 471.94 | 146.62 | 98.96 | 62.65 | 36.82 | 0.00 |
| Critical Areas | 450.86 | 277.61 | 43.69 | 69.51 | 37.86 | 22.19 | 0.00 |
| Future Public Uses | 15.80 | 14.00 | 0.00 | 0.00 | 0.00 | 1.80 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 17.52 | 9.02 | 5.15 | 1.47 | 1.24 | 0.64 | 0.00 |
| Infrastructure Deduction | 74.76 | 41.48 | 22.13 | 5.30 | 4.26 | 1.59 | 0.00 |
| Market Factor | 43.87 | 22.07 | 12.86 | 3.85 | 3.28 | 1.80 | 0.00 |
| **Net Acres** | **214.18** | **107.77** | **62.79** | **18.82** | **16.01** | **8.80** | **0.00** |
| **Partially-Used Land** | | | | | | | |
| Gross Acres | 232.69 | 109.12 | 64.66 | 0.00 | 52.63 | 6.28 | 0.00 |
| Critical Areas | 84.62 | 48.97 | 14.24 | 0.00 | 20.73 | 0.69 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 7.40 | 3.01 | 2.52 | 0.00 | 1.59 | 0.28 | 0.00 |
| Infrastructure Deduction | 30.86 | 13.84 | 10.84 | 0.00 | 5.49 | 0.69 | 0.00 |
| Market Factor | 29.65 | 11.69 | 10.01 | 0.00 | 6.70 | 1.25 | 0.00 |
| **Net Acres** | **80.16** | **31.62** | **27.06** | **0.00** | **18.11** | **3.37** | **0.00** |
| **Underutilized Land** | | | | | | | |
| Gross Acres | 4.16 | 0.00 | 0.00 | 0.00 | 0.00 | 4.16 | 0.00 |
| Critical Areas | 0.28 | 0.00 | 0.00 | 0.00 | 0.00 | 0.28 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 0.19 | 0.00 | 0.00 | 0.00 | 0.00 | 0.19 | 0.00 |
| Infrastructure Deduction | 0.48 | 0.00 | 0.00 | 0.00 | 0.00 | 0.48 | 0.00 |
| Market Factor | 0.87 | 0.00 | 0.00 | 0.00 | 0.00 | 0.87 | 0.00 |
| **Net Acres** | **2.34** | **0.00** | **0.00** | **0.00** | **0.00** | **2.34** | **0.00** |

*Sources: Whatcom County, 2022; Community Attributes Inc., 2021.*

## Exhibit 22. Developable Residential Land Capacity, Birch Bay UGA, 2021-2036

| | UGA | UR4 | URM6 | URM24 | RC | GC | NC |
|---|---|---|---|---|---|---|---|
| **Net Developable Residential Acres (Vacant, PU, UU)** | **296.68** | **139.39** | **89.85** | **18.82** | **34.12** | **14.51** | **0.00** |
| **Single Family Developable Acres** | 249.48 | 139.39 | 76.37 | 9.41 | 17.06 | 7.25 | - |
| Assumed Single Family Density (units/acre) | | 4 | 6 | 10 | 8 | 8 | |
| Subtotal Single Family Unit Capacity | 1,358 | 612 | 450 | 94 | 142 | 60 | - |
| Existing Single Family Units | 188 | 67 | 95 | - | 4 | 4 | 18 |
| Pending Single Family Units | 145 | - | 145 | - | - | - | - |
| Master Planned Single Family Units | - | - | - | - | - | - | - |
| Subtotal: Net Single Family Unit Capacity | 1,333 | 545 | 500 | 94 | 138 | 56 | - |
| Potential Occupied Single Family Units | 1,000 | 409 | 375 | 71 | 104 | 42 | - |
| Single Family Population Capacity | 2,380 | 973 | 893 | 168 | 246 | 100 | - |
| **Multifamily Developable Acres** | 47.20 | - | 13.48 | 9.41 | 17.06 | 7.25 | - |
| Assumed Multifamily Density (units/acre) | | | 6 | 17 | 17 | 17 | |
| Subtotal Multifamily Unit Capacity | 652 | - | 79 | 160 | 290 | 123 | - |
| Existing Multifamily Units | 148 | - | 35 | - | 113 | - | - |
| Pending Multifamily Units | - | - | - | - | - | - | - |
| Master Planned Multifamily Units | - | - | - | - | - | - | - |
| Subtotal: Net Multifamily Unit Capacity | 504 | - | 44 | 160 | 177 | 123 | - |
| Potential Occupied Multifamily Units | 257 | - | 22 | 82 | 90 | 63 | - |
| Multifamily Population Capacity | 570 | - | 50 | 181 | 200 | 139 | - |
| Net Dwelling Unit Capacity | 1,837 | 545 | 544 | 254 | 315 | 179 | - |
| Potential Occupied Dwelling Units | 1,257 | 409 | 397 | 152 | 194 | 105 | - |
| **Population Capacity** | **2,950** | **973** | **943** | **349** | **446** | **239** | **-** |
| Remaining Population Growth to Accommodate (2021-2036) | 4,204 | | | | | | |
| **Population Capacity Surplus (Deficit)** | **(1,254)** | | | | | | |

*Sources: Whatcom County, 2022; Community Attributes Inc., 2021.*

## Commercial and Industrial Development

**Exhibit 23. Nonresidential Development, Achieved and Assumed Densities, Birch Bay UGA, 2016-2021**

| Zoning Designation | Development Type | Acres Developed | Built Square Feet | Achieved Density (FAR) | Assumed Density (FAR) |
|---|---|---|---|---|---|
| UR4 | Commercial | 7.1 | 3,780 | 0.01 | N/A |
| RC | Commercial | 0.6 | 368 | 0.01 | 0.18 |
| GC | Commercial | 4.1 | 26,480 | 0.15 | 0.18 |
| NC | Commercial | N/A | N/A | N/A | 0.18 |

*Sources: Whatcom County, 2022; Community Attributes Inc., 2021.*
*Note: Assumed Density is the assumed density for evaluation of land suitable for development by zone.*

## Exhibit 24. Developable Nonresidential Land Supply, Birch Bay UGA, 2021-2036

| | UGA Total | UR4 | URM6 | URM24 | RC | GC | NC |
|---|---|---|---|---|---|---|---|
| **Vacant Land** | | | | | | | |
| Gross Acres | 103.67 | 0.00 | 0.00 | 0.00 | 6.96 | 85.91 | 10.80 |
| Critical Areas | 64.19 | 0.00 | 0.00 | 0.00 | 4.21 | 51.77 | 8.21 |
| Future Public Uses | 4.20 | 0.00 | 0.00 | 0.00 | 0.00 | 4.20 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 1.76 | 0.00 | 0.00 | 0.00 | 0.14 | 1.50 | 0.13 |
| Infrastructure Deduction | 4.44 | 0.00 | 0.00 | 0.00 | 0.47 | 3.71 | 0.26 |
| Market Factor | 4.94 | 0.00 | 0.00 | 0.00 | 0.36 | 4.20 | 0.37 |
| **Net Acres** | **24.13** | **0.00** | **0.00** | **0.00** | **1.78** | **20.52** | **1.82** |
| **Partially-Used Land** | | | | | | | |
| Gross Acres | 20.50 | 0.00 | 0.00 | 0.00 | 5.85 | 14.65 | 0.00 |
| Critical Areas | 3.91 | 0.00 | 0.00 | 0.00 | 2.30 | 1.60 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 0.83 | 0.00 | 0.00 | 0.00 | 0.18 | 0.65 | 0.00 |
| Infrastructure Deduction | 2.23 | 0.00 | 0.00 | 0.00 | 0.61 | 1.62 | 0.00 |
| Market Factor | 3.65 | 0.00 | 0.00 | 0.00 | 0.74 | 2.91 | 0.00 |
| **Net Acres** | **9.88** | **0.00** | **0.00** | **0.00** | **2.01** | **7.87** | **0.00** |
| **Underutilized Land** | | | | | | | |
| Gross Acres | 17.52 | 0.00 | 0.00 | 0.00 | 0.00 | 9.70 | 7.82 |
| Critical Areas | 0.64 | 0.00 | 0.00 | 0.00 | 0.00 | 0.64 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 0.84 | 0.00 | 0.00 | 0.00 | 0.00 | 0.45 | 0.39 |
| Infrastructure Deduction | 1.91 | 0.00 | 0.00 | 0.00 | 0.00 | 1.12 | 0.78 |
| Market Factor | 3.81 | 0.00 | 0.00 | 0.00 | 0.00 | 2.02 | 1.79 |
| **Net Acres** | **10.31** | **0.00** | **0.00** | **0.00** | **0.00** | **5.46** | **4.85** |

*Sources: Whatcom County, 2022; Community Attributes Inc., 2021.*

## Exhibit 25. Developable Nonresidential Land Capacity, Birch Bay UGA, 2021-2036

| | UGA | UR4 | URM6 | URM24 | RC | GC | NC |
|---|---|---|---|---|---|---|---|
| **Net Developable Employment Acres (Vacant, PU, UU)** | **44.32** | **0.00** | **0.00** | **0.00** | **3.79** | **33.85** | **6.68** |
| **Commercial Developable Acres** | 44.32 | - | - | - | 3.79 | 33.85 | 6.68 |
| Assumed Commercial Density (FAR) | | | | | 0.2 | 0.2 | 0.2 |
| Subtotal: Commercial Capacity (SF) | 355,214 | - | - | - | 30,387 | 271,322 | 53,505 |
| Existing Commercial Space (SF) | 70,779 | 3,848 | 7,663 | - | 35,726 | 21,742 | 1,800 |
| Pending Commercial Space (SF) | 19,776 | - | - | - | - | 19,776 | - |
| Master Planned Commercial Space (SF) | - | - | - | - | - | - | - |
| Subtotal: Net Commercial Capacity (SF) | 321,061 | - | - | - | - | 269,356 | 51,705 |
| Potential Occupied Commercial Space (SF) | 305,008 | - | - | - | - | 255,888 | 49,120 |
| Commercial Employment Capacity | 573 | - | - | - | - | 481 | 92 |
| **Industrial Developable Acres** | - | - | - | - | - | - | - |
| Assumed Industrial Density (FAR) | | | | | | | |
| Subtotal: Industrial Capacity (SF) | - | - | - | - | - | - | - |
| Existing Industrial Space (SF) | 43,012 | 2,402 | 6,768 | - | 756 | 33,086 | - |
| Pending Industrial Space (SF) | - | - | - | - | - | - | - |
| Master Planned Industrial Space (SF) | - | - | - | - | - | - | - |
| Subtotal: Net Industrial Capacity (SF) | - | - | - | - | - | - | - |
| Potential Occupied Industrial Space (SF) | - | - | - | - | - | - | - |
| Industrial Employment Capacity | - | - | - | - | - | - | - |
| Net Commercial & Industrial Capacity (SF) | 321,061 | - | - | - | - | 269,356 | 51,705 |
| Potential Occupied Commercial & Industrial | 305,008 | - | - | - | - | 255,888 | 49,120 |
| Employment Capacity | **573** | - | - | - | - | 481 | 92 |
| Remaining Employment Growth to Accommodate (2021-2036) | 419 | | | | | | |
| **Employment Capacity Surplus (Deficit)** | **154** | | | | | | |

*Sources: Whatcom County, 2022; Community Attributes Inc., 2021.*

## 3. Blaine UGA

The Blaine Urban Growth Area is projected to encompass 9,585 residents and 5,159 employees by 2036. The UGA has a projected growth allocation of 3,838 population and 1,823 employment between 2016 and 2036 (**Exhibit 1** and **Exhibit 2**).

**Achieved Growth 2016-2021**

Based on permit data collected between 2016 and 2021 and occupancy and persons per household and square feet per employee assumptions, the Blaine UGA grew by an estimated 551 population (91% within the City of Blaine) and 245 employment (100% within the City of Blaine) (**Exhibit 6** and **Exhibit 7**).

Between 2016 and 2021, the City of Blaine achieved densities greater than planned for residential uses, 4.4 units per acre achieved compared to 4.25 average across single family residential zones adopted by the City of Blaine. The achieved density within the incorporated portions of the UGA also fall within the planned densities of 4.0 to 6.0 units per acre adopted in the *Whatcom County Comprehensive Plan* for the City of Blaine (**Exhibit 11**).

The unincorporated portions of the Blaine UGA have an achieved residential density of 4.7 units per acre, matching the densities achieved within incorporated portions of the UGA (**Exhibit 11**).

The City of Blaine has not adopted FARs. However, for purposes of the Data Reporting Tool, Blaine developed FARs based on the bulk, dimensional, and performance standards defined in municipal code for non-residential zones. The City of Blaine developed planned FARs for commercial zones averaging 0.80. Across all commercial development between 2016-2021, the achieved FAR is 0.31. No commercial development occurred during the period in unincorporated areas of the UGA. The average planned FAR for industrial zones is 0.89 for the City of Blaine. Between 2016 and 2021, the achieved FAR is 0.30. No industrial development occurred in the unincorporated portions of the UGA. Whatcom County has not adopted planned densities for commercial or industrial development (**Exhibit 11**).

## Population and Employment Assumptions

Specific occupancy rate and population and employment density assumptions for the Blaine UGA are:

- 87.8% Single Family occupancy rate
- 86.9% Multifamily occupancy rate
- 95.0% Commercial and Industrial occupancy rate
- 2.479 Single Family persons per household
- 2.009 Multifamily persons per household
- 531 and 739 respectively Commercial and Industrial square feet per employee

The Blaine UGA has an estimated 3,287 population and 1,578 employment growth remaining to accommodate between 2021 and 2036 (**Exhibit 6** and **Exhibit 7**).

## Population Capacity 2021-2036

Based on achieved densities between 2016 and 2021 and planning assumptions, City of Blaine planners are assuming future densities ranging between 3.0 units per acre and 20.0 units per acre for single family residential, depending on the specific zone. Future density assumptions range between 4.0 and 24.0 units per acre for multifamily zones (**Exhibit 26**).

The Blaine UGA has estimated net land capacity for population growth of 684.97 acres (**Exhibit 27**), with a total estimated potential occupied unit capacity of 4,857 dwelling units. Based on persons per household assumptions, the Blaine UGA has an estimated population capacity of 11,324, indicating an estimated population capacity surplus of 8,037 (**Exhibit 28**).

## Housing Needs by Type

The *Whatcom County Comprehensive Plan* (Chapter 3- Housing, Chart 3 – Estimated Dwelling Units Needed, page 3-8) indicates that Blaine has a need for 1,548 single-family and 678 multi-family new dwelling units during the 2013-2036 planning period. The calculation for Chart 3 in the *Whatcom County Comprehensive Plan* included building activity from 2013. Therefore, the analysis below includes permit data from April 1, 2013, even though the planning period for this Buildable Lands Report is from 2016.

- Between April 1, 2013 and March 31, 2021, Blaine issued building permits for 343 single-family/mobile home units, 5 accessory dwelling units, and multi-family

units 179 (this includes duplexes). Comparing units built and the needs indicated on Chart 3, Blaine needs an additional 1,205 single-family/mobile home units and 499 multi-family units between 2021 and 2036.

- The City and unincorporated UGA have an estimated 2021-2036 net capacity for 3,794 single-family and 1,756 multi-family housing units.

These capacities are sufficient to accommodate the dwelling unit types needed in the planning period as established in the Whatcom County Comprehensive Plan (Chapter 3- Housing, Chart 3).

**Employment Capacity 2021-2036**

Based on achieved densities between 2016 and 2021 and planning assumptions, City of Blaine planners are assuming future commercial FARs ranging between 0.60 and 1.00, depending on the specific zone. Assumed future industrial FARs range between 0.75 and 1.00 (**Exhibit 29**).

The Blaine UGA has estimated net land capacity for employment growth of 165.76 acres (**Exhibit 30**), with a total estimated potential occupied commercial and industrial capacity of 5.38 million square feet. Based on square feet per employee assumptions, the Blaine UGA has an estimated employment capacity of 8,570, indicating an estimated employment capacity surplus of 6,992 (**Exhibit 31**).

**Regulatory Changes**

Subsequent to the adoption of the 2016 Comprehensive Plan and through April of 2021, the City of Blaine adopted regulatory changes that either impacted the amount of land available for development or modified the densities and mix of uses allowed on buildable lands. These changes are listed in the Data Reporting Tool worksheet. In summary, those updates include the following:

- Updates to the City's Central Business District zoning designation that allow it to function as an urban village. Examples include zero-lot line setbacks, multi-use and multi-family development, and higher allowable impervious surfaces.

- Adoption of a multi-family tax exemption (MFTE) to encourage the construction of affordable, multi-family housing.

- Updates to the Wharf District Master Plan to permit additional space for

marine commercial and industrial development.

As of the issuance of this report, the City has additionally adopted updates to allow work/live units in the Manufacturing zone, and modified the Highway Commercial "C" zone to permit a greater range of land uses.

The City in early 2022 also adopted legislation to identify the Hearing Examiner as the hearing body for quasi-judicial decisions, ensuring a more predictable and legally sound process for land use decisions. The City will be updating the Critical Areas Ordinance in 2023.

**Infrastructure Gaps**

Blaine has identified a lack of capacity for sewer service in East Blaine, however the City of Blaine Capital Improvement Plan for Wastewater Utility: 2022-2027 anticipates needed capacity being restored pursuant to the funded "G Street Sewer Improvement – East Blaine Pipe Capacity" project. Subsequent to the improvements being completed in 2022, the City will be able to supply this planned wastewater capital facilities to developable land in the eastern Blaine UGA within the planning period (2021-2036). Additional sewer upgrades under I-5 are identified in the 2022-2027 CIP. The City of Blaine has identified potential constraints to water availability and capacity. The City has contracted with a consultant to both identify existing capacity and propose recommendations to increase that capacity. As of the writing of this report, the City has determined that if needed, it will consider updates to the 2021 Comprehensive Water System Plan and Capital Facilities Plan to plan and budget for the increased capacity, and therefore the planned densities in the City's Comprehensive Plan will be realized.

**Analysis of Comprehensive Plan Objectives and Reasonable Measures**

The City of Blaine has determined that growth targets and assumptions for residential development are being met. Therefore, an analysis of comprehensive plan residential development targets, assumptions, and objectives is not deemed necessary during the reporting cycle.

No inconsistencies between planned and actual residential growth have been identified in the Blaine UGA. Therefore, reasonable measures are not required under RCW 36.70A.215.

The City of Blaine has identified that there are inconsistencies between planned and actual commercial, industrial, and manufacturing growth in the Blaine UGA.

Potential reasonable measures may include the following:

- Updates to the Binding Site Plans requirements. Blaine should consider adopting updates that require the installation of public and private infrastructure as a condition of final binding site plan approval. Binding site plan expiration dates should be modified to align with the timelines for plats.

- Updates the allowed uses in the Manufacturing zoning districts. Blaine should consider adopting updates that would expand allowed uses in the manufacturing zone, subject to appropriate performance standards.

**Exhibit 26. Residential Development, Achieved and Assumed Densities, City of Blaine, 2016-2021**

| Zoning Designation | Development Type | Acres Developed | Dwelling Units | Achieved Density (Units/Acre) | Density Assumed (Units/Acre) |
|---|---|---|---|---|---|
| PR | Single Family | 3.3 | 17 | 5.09 | 4.00 |
| | Multifamily | N/A | N/A | N/A | 4.00 |
| RL | Single Family | 9.6 | 54 | 5.62 | 6.00 |
| SF-1 | Single Family | 1.0 | 4 | 4.09 | 6.00 |
| SF-2 | Single Family | 2.3 | 14 | 6.19 | 6.00 |
| PC | Single Family | 0.2 | 1 | 5.42 | N/A |
| RH | Single Family | N/A | N/A | N/A | 20.00 |
| | Multifamily | 0.5 | 2 | 3.72 | 24.00 |
| RM | Single Family | 2.4 | 14 | 5.82 | 6.00 |
| | Multifamily | 2.6 | 28 | 10.61 | 12.00 |
| R/O | Single Family | N/A | N/A | N/A | 6.00 |
| | Multifamily | N/A | N/A | N/A | 24.00 |
| RPR | Single Family | 21.0 | 72 | 3.42 | 3.00 |
| CB G-36 | Multifamily | N/A | N/A | N/A | 20.00 |
| CB G-48 | Multifamily | N/A | N/A | N/A | 20.00 |
| CB-M | Multifamily | N/A | N/A | N/A | 20.00 |
| CB M-48 | Multifamily | N/A | N/A | N/A | 20.00 |
| CB M-60 | Multifamily | N/A | N/A | N/A | 20.00 |
| CB-T | Multifamily | N/A | N/A | N/A | 20.00 |
| CB TP-60 | Multifamily | N/A | N/A | N/A | 20.00 |
| CB WV-36 | Multifamily | N/A | N/A | N/A | 20.00 |
| HCA | Multifamily | N/A | N/A | N/A | 20.00 |
| HCb | Multifamily | N/A | N/A | N/A | N/A |
| HCc | Multifamily | N/A | N/A | N/A | 20.00 |
| HCd | Multifamily | N/A | N/A | N/A | 20.00 |
| Mpr | Single Family | 6.4 | 36 | 5.60 | 5.00 |
| | Multifamily | 3.3 | 18 | 5.40 | 12.00 |

*Sources: City of Blaine, 2022; Community Attributes Inc., 2021.*
*Note: "Density Assumed" is the assumed density for evaluation of land suitable for development by zone. NOTE Assumed densities differ from achieved density*

## Exhibit 27. Residential Land Supply, Blaine UGA, 2021-2036

| | UGA Total | CB-M | CB-T | HCA | Ma | Mb | Mpr | PC | PR | RL | RM | R/O | RPR | SF-1 | SF-2 | CB TP-60 | CB M-60 | CB M-48 | CB G-36 | CB WV-36 | HCc | HCd | RH | CB G-48 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Vacant Land** | | | | | | | | | | | | | | | | | | | | | | | | |
| Gross Acres | 818.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 7.74 | 368.53 | 109.17 | 38.43 | 54.74 | 216.18 | 5.18 | 3.77 | 2.21 | 0.31 | 0.97 | 2.13 | 6.00 | 1.43 | 0.63 | 0.52 | 0.07 |
| Critical Areas | 229.19 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 5.65 | 48.30 | 47.05 | 20.83 | 49.74 | 49.74 | 0.52 | 0.30 | 0.68 | 0.27 | 0.23 | 0.10 | 5.26 | 0.00 | 0.00 | 0.52 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 29.44 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.10 | 16.01 | 3.11 | 0.88 | 0.25 | 8.32 | 0.23 | 0.17 | 0.08 | 0.00 | 0.04 | 0.10 | 0.04 | 0.07 | 0.03 | 0.00 | 0.00 |
| Infrastructure Deduction | 29.44 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.10 | 16.01 | 3.11 | 0.88 | 0.25 | 8.32 | 0.23 | 0.17 | 0.08 | 0.00 | 0.04 | 0.10 | 0.04 | 0.07 | 0.03 | 0.00 | 0.00 |
| Market Factor | 79.49 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.28 | 43.23 | 8.39 | 2.38 | 0.68 | 22.47 | 0.63 | 0.47 | 0.21 | 0.01 | 0.10 | 0.27 | 0.10 | 0.19 | 0.08 | 0.00 | 0.01 |
| **Net Acres** | **450.45** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **1.60** | **244.98** | **47.52** | **13.47** | **3.83** | **127.33** | **3.56** | **2.65** | **1.17** | **0.03** | **0.57** | **1.55** | **0.56** | **1.09** | **0.48** | **0.00** | **0.05** |
| **Partially-Used Land** | | | | | | | | | | | | | | | | | | | | | | | | |
| Gross Acres | 428.70 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 3.80 | 181.35 | 213.60 | 9.27 | 1.40 | 9.68 | 0.48 | 5.18 | 0.45 | 0.00 | 0.71 | 0.48 | 0.36 | 1.01 | 0.09 | 0.34 | 0.49 |
| Critical Areas | 86.61 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.58 | 14.41 | 68.67 | 2.33 | 0.00 | 0.03 | 0.00 | 0.00 | 0.31 | 0.00 | 0.03 | 0.00 | 0.01 | 0.00 | 0.00 | 0.24 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 17.10 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.16 | 8.35 | 7.25 | 0.35 | 0.07 | 0.48 | 0.02 | 0.26 | 0.01 | 0.00 | 0.03 | 0.02 | 0.02 | 0.05 | 0.00 | 0.01 | 0.02 |
| Infrastructure Deduction | 17.10 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.16 | 8.35 | 7.25 | 0.35 | 0.07 | 0.48 | 0.02 | 0.26 | 0.01 | 0.00 | 0.03 | 0.02 | 0.02 | 0.05 | 0.00 | 0.01 | 0.02 |
| Market Factor | 76.97 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.72 | 37.56 | 32.61 | 1.56 | 0.32 | 2.17 | 0.11 | 1.16 | 0.03 | 0.00 | 0.15 | 0.11 | 0.08 | 0.23 | 0.02 | 0.02 | 0.11 |
| **Net Acres** | **230.91** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **2.17** | **112.68** | **97.83** | **4.69** | **0.95** | **6.51** | **0.33** | **3.49** | **0.09** | **0.00** | **0.46** | **0.32** | **0.23** | **0.68** | **0.06** | **0.07** | **0.33** |
| **Underutilized Land** | | | | | | | | | | | | | | | | | | | | | | | | |
| Gross Acres | 5.57 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.40 | 2.55 | 0.00 | 0.00 | 0.00 | 0.21 | 0.16 | 0.42 | 0.00 | 0.00 | 0.68 | 0.56 | 0.00 | 0.59 |
| Critical Areas | 0.21 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.16 | 0.00 | 0.00 | 0.00 | 0.06 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 0.27 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.02 | 0.13 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 | 0.02 | 0.00 | 0.00 | 0.03 | 0.03 | 0.00 | 0.03 |
| Infrastructure Deduction | 0.27 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.02 | 0.13 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 | 0.02 | 0.00 | 0.00 | 0.03 | 0.03 | 0.00 | 0.03 |
| Market Factor | 1.20 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.09 | 0.57 | 0.00 | 0.00 | 0.00 | 0.05 | 0.00 | 0.09 | 0.00 | 0.00 | 0.14 | 0.13 | 0.00 | 0.13 |
| **Net Acres** | **3.61** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.27** | **1.72** | **0.00** | **0.00** | **0.00** | **0.14** | **0.00** | **0.28** | **0.00** | **0.00** | **0.42** | **0.38** | **0.00** | **0.40** |

*Sources: City of Blaine, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

## Exhibit 28. Developable Residential Land Capacity, Blaine UGA, 2021-2036

| | UGA | CB-M | CB-T | HCA | Ma | Mb | Mpr | PC | PR | RL | RM | R/O | RPR | SF-1 | SF-2 | CB TP-60 | CB M-60 | CB M-48 | CB G-36 | CB WV-36 | HCc | HCd | RH | CB G-48 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Net Developable Residential Acres (Vacant, PU, UU)** | **684.97** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **3.77** | **357.66** | **145.36** | **18.42** | **6.49** | **133.84** | **3.89** | **6.15** | **1.41** | **0.04** | **1.31** | **1.87** | **0.80** | **2.19** | **0.92** | **0.07** | **0.79** |
| **Single Family Developable Acres** | 546.67 | - | - | - | - | - | - | - | 282.37 | 145.36 | - | 3.25 | 105.66 | 3.89 | 6.15 | - | - | - | - | - | - | - | 0.00 | - |
| Assumed Single Family Density (units/acre) | | | | | | | 5 | | 4 | 6 | 6 | 6 | 3 | 6 | 6 | | | | | | | | 20 | |
| Subtotal Single Family Unit Capacity | 2,397 | - | - | - | - | - | - | - | 1,129 | 872 | - | 19 | 317 | 23 | 37 | - | - | - | - | - | - | - | - | - |
| Existing Single Family Units | 232 | - | - | 28 | 2 | 11 | - | - | 58 | 74 | 11 | 5 | - | 5 | 13 | 1 | - | - | 3 | - | 8 | 3 | 2 | 4 |
| Pending Single Family Units | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Master Planned Single Family Units | 1,552 | - | - | - | - | - | - | - | 1,177 | - | - | - | 375 | - | - | - | - | - | - | - | - | - | - | - |
| Subtotal: Net Single Family Unit Capacity | 3,794 | - | - | - | - | - | - | - | 2,248 | 798 | - | 14 | 692 | 18 | 24 | - | - | - | - | - | - | - | - | - |
| Potential Occupied Single Family Units | 3,331 | - | - | - | - | - | - | - | 1,974 | 701 | - | 12 | 608 | 16 | 21 | - | - | - | - | - | - | - | - | - |
| Single Family Population Capacity | 8,258 | - | - | - | - | - | - | - | 4,893 | 1,737 | - | 30 | 1,506 | 39 | 52 | - | - | - | - | - | - | - | - | - |
| **Multifamily Developable Acres** | 138.30 | - | - | - | - | - | - | 3.77 | 75.30 | - | 18.42 | 3.25 | 28.18 | - | - | 1.41 | 0.04 | 1.31 | 1.87 | 0.80 | 2.19 | 0.92 | 0.07 | 0.79 |
| Assumed Multifamily Density (units/acre) | | 20 | 20 | 20 | | | 12 | 18 | 4 | | 12 | 24 | 12 | | | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 24 | 20 |
| Subtotal Multifamily Unit Capacity | 1,194 | - | - | - | - | - | - | 68 | 301 | - | 221 | 78 | 338 | - | - | 28 | 1 | 26 | 37 | 16 | 44 | 18 | 2 | 16 |
| Existing Multifamily Units | 27 | - | - | - | - | - | - | - | 3 | 2 | - | 8 | - | - | 4 | - | - | 2 | 8 | - | - | - | - | - |
| Pending Multifamily Units | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Master Planned Multifamily Units | 583 | - | - | - | - | - | 220 | - | 212 | - | - | - | 151 | - | - | - | - | - | - | - | - | - | - | - |
| Subtotal: Net Multifamily Unit Capacity | 1,756 | - | - | - | - | - | 220 | 68 | 510 | - | 221 | 70 | 489 | - | - | 28 | 1 | 24 | 29 | 16 | 44 | 18 | 2 | 16 |
| Potential Occupied Multifamily Units | 1,526 | - | - | - | - | - | 191 | 59 | 443 | - | 192 | 61 | 425 | - | - | 24 | 1 | 21 | 25 | 14 | 38 | 16 | 2 | 14 |
| Multifamily Population Capacity | 3,066 | - | - | - | - | - | 384 | 119 | 890 | - | 386 | 122 | 854 | - | - | 49 | 2 | 42 | 51 | 28 | 77 | 31 | 3 | 28 |
| Net Dwelling Unit Capacity | 5,550 | - | - | - | - | - | 220 | 68 | 2,758 | 798 | 221 | 84 | 1,181 | 18 | 24 | 28 | 1 | 24 | 29 | 16 | 44 | 18 | 2 | 16 |
| Potential Occupied Dwelling Units | 4,857 | - | - | - | - | - | 191 | 59 | 2,417 | 701 | 192 | 73 | 1,033 | 16 | 21 | 24 | 1 | 21 | 25 | 14 | 38 | 16 | 2 | 14 |
| **Population Capacity** | **11,324** | **-** | **-** | **-** | **-** | **-** | **384** | **119** | **5,783** | **1,737** | **386** | **152** | **2,360** | **39** | **52** | **49** | **2** | **42** | **51** | **28** | **77** | **31** | **3** | **28** |
| Remaining Population Growth to Accommodate (2021-2036) | 3,287 | | | | | | | | | | | | | | | | | | | | | | | |
| **Population Capacity Surplus (Deficit)** | **8,037** | | | | | | | | | | | | | | | | | | | | | | | |

*Sources: City of Blaine, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

**Exhibit 29. Nonresidential Development, Achieved and Assumed Densities, City of Blaine, 2016-2021**

| Zoning Designation | Development Type | Acres Developed | Built Square Feet | Achieved Density (FAR) | Assumed Density (FAR) |
|---|---|---|---|---|---|
| PR | Commercial | N/A | N/A | N/A | 0.60 |
| PC | Commercial | N/A | N/A | N/A | 0.80 |
| R/O | Commercial | N/A | N/A | N/A | 0.70 |
| RPR | Commercial | 0.5 | 6,955 | 0.31 | 0.70 |
| CB G-36 | Commercial | N/A | N/A | N/A | 0.85 |
| CB G-48 | Commercial | N/A | N/A | N/A | 0.85 |
| CB-M | Commercial | 0.9 | 19,644 | 0.51 | 1.00 |
| CB M-48 | Commercial | N/A | N/A | N/A | 1.00 |
| CB M-60 | Commercial | N/A | N/A | N/A | 1.00 |
| CB-T | Commercial | N/A | N/A | N/A | 1.00 |
| CB TP-60 | Commercial | N/A | N/A | N/A | 1.00 |
| CB WV-36 | Commercial | N/A | N/A | N/A | 1.00 |
| CB-W | Commercial | 3.7 | 62,296 | 0.39 | 1.00 |
| | Industrial | N/A | N/A | N/A | 1.00 |
| GW | Commercial | N/A | N/A | N/A | 0.90 |
| | Industrial | 2.3 | 22,873 | 0.23 | 0.90 |
| HCA | Commercial | 1.5 | 27,685 | 0.41 | 0.85 |
| HCb | Commercial | N/A | N/A | N/A | 0.85 |
| HCc | Commercial | N/A | N/A | N/A | 0.85 |
| HCd | Commercial | N/A | N/A | N/A | 0.85 |
| M | Industrial | N/A | N/A | N/A | 0.75 |
| Ma | Commercial | N/A | N/A | N/A | 0.75 |
| | Industrial | N/A | N/A | N/A | 0.75 |
| Mb | Commercial | N/A | N/A | N/A | 0.75 |
| | Industrial | N/A | N/A | N/A | 0.75 |
| Mc | Commercial | N/A | N/A | N/A | 0.75 |
| | Industrial | 2.9 | 43,600 | 0.35 | 0.75 |
| Mpr | Commercial | N/A | N/A | N/A | 0.70 |

*Sources: City of Blaine, 2022; Community Attributes Inc., 2021.*
*Note: Assumed Density is the assumed density for evaluation of land suitable for development by zone.*

## Exhibit 30. Developable Nonresidential Land Supply, Blaine UGA, 2021-2036

| | UGA Total | GW | HCA | Ma | Mb | Mc | Mpr | PC | PR | RL | R/O | RPR | CB TP-60 | CB M-60 | CB M-48 | CB G-36 | CB WV-36 | HCb | HCc | HCd | CB G-48 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Vacant Land** | | | | | | | | | | | | | | | | | | | | | |
| Gross Acres | 262.01 | 9.05 | 41.03 | 15.07 | 122.02 | 9.23 | 0.00 | 2.58 | 19.40 | 0.00 | 13.69 | 11.38 | 0.25 | 0.08 | 0.32 | 0.53 | 3.01 | 2.59 | 1.43 | 0.63 | 0.02 |
| Critical Areas | 105.40 | 0.00 | 24.34 | 1.83 | 55.65 | 0.73 | 0.00 | 1.88 | 2.54 | 0.00 | 12.44 | 2.62 | 0.08 | 0.07 | 0.08 | 0.03 | 2.64 | 0.00 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 7.83 | 0.45 | 0.83 | 0.66 | 3.32 | 0.43 | 0.00 | 0.03 | 0.84 | 0.00 | 0.06 | 0.44 | 0.01 | 0.00 | 0.01 | 0.03 | 0.02 | 0.13 | 0.07 | 0.03 | 0.00 |
| Infrastructure Deduction | 7.83 | 0.45 | 0.83 | 0.66 | 3.32 | 0.43 | 0.00 | 0.03 | 0.84 | 0.00 | 0.06 | 0.44 | 0.01 | 0.00 | 0.01 | 0.03 | 0.02 | 0.13 | 0.07 | 0.03 | 0.00 |
| Market Factor | 21.14 | 1.22 | 2.25 | 1.79 | 8.96 | 1.15 | 0.00 | 0.09 | 2.28 | 0.00 | 0.17 | 1.18 | 0.02 | 0.00 | 0.03 | 0.07 | 0.05 | 0.35 | 0.19 | 0.08 | 0.00 |
| **Net Acres** | **119.80** | **6.93** | **12.76** | **10.13** | **50.77** | **6.50** | **0.00** | **0.53** | **12.89** | **0.00** | **0.96** | **6.70** | **0.13** | **0.01** | **0.19** | **0.39** | **0.28** | **1.98** | **1.09** | **0.48** | **0.01** |
| **Partially-Used Land** | | | | | | | | | | | | | | | | | | | | | |
| Gross Acres | 43.68 | 15.80 | 2.93 | 0.00 | 4.87 | 2.76 | 0.00 | 1.27 | 9.54 | 0.00 | 0.35 | 0.51 | 0.05 | 0.00 | 0.24 | 0.12 | 0.18 | 1.63 | 1.01 | 0.09 | 0.12 |
| Critical Areas | 10.97 | 4.58 | 1.59 | 0.00 | 0.71 | 0.15 | 0.00 | 0.19 | 0.76 | 0.00 | 0.00 | 0.00 | 0.03 | 0.00 | 0.01 | 0.00 | 0.01 | 0.71 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 1.64 | 0.56 | 0.07 | 0.00 | 0.21 | 0.13 | 0.00 | 0.05 | 0.44 | 0.00 | 0.02 | 0.03 | 0.00 | 0.00 | 0.01 | 0.01 | 0.01 | 0.05 | 0.05 | 0.00 | 0.01 |
| Infrastructure Deduction | 1.64 | 0.56 | 0.07 | 0.00 | 0.21 | 0.13 | 0.00 | 0.05 | 0.44 | 0.00 | 0.02 | 0.03 | 0.00 | 0.00 | 0.01 | 0.01 | 0.01 | 0.05 | 0.05 | 0.00 | 0.01 |
| Market Factor | 7.36 | 2.52 | 0.30 | 0.00 | 0.94 | 0.59 | 0.00 | 0.24 | 1.98 | 0.00 | 0.08 | 0.11 | 0.00 | 0.00 | 0.05 | 0.03 | 0.04 | 0.21 | 0.23 | 0.02 | 0.03 |
| **Net Acres** | **22.08** | **7.57** | **0.90** | **0.00** | **2.81** | **1.76** | **0.00** | **0.72** | **5.93** | **0.00** | **0.24** | **0.34** | **0.01** | **0.00** | **0.15** | **0.08** | **0.12** | **0.62** | **0.68** | **0.06** | **0.08** |
| **Underutilized Land** | | | | | | | | | | | | | | | | | | | | | |
| Gross Acres | 64.54 | 0.30 | 6.19 | 13.03 | 42.07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.64 | 0.00 | 0.02 | 0.04 | 0.14 | 0.00 | 0.00 | 0.72 | 0.68 | 0.56 | 0.15 |
| Critical Areas | 29.17 | 0.00 | 2.10 | 4.45 | 22.52 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.04 | 0.00 | 0.00 | 0.00 | 0.00 | 0.06 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 1.77 | 0.01 | 0.20 | 0.43 | 0.98 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.03 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 | 0.00 | 0.04 | 0.03 | 0.03 | 0.01 |
| Infrastructure Deduction | 1.77 | 0.01 | 0.20 | 0.43 | 0.98 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.03 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 | 0.00 | 0.04 | 0.03 | 0.03 | 0.01 |
| Market Factor | 7.96 | 0.07 | 0.92 | 1.93 | 4.40 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.14 | 0.00 | 0.01 | 0.00 | 0.03 | 0.00 | 0.00 | 0.16 | 0.14 | 0.13 | 0.03 |
| **Net Acres** | **23.87** | **0.20** | **2.76** | **5.79** | **13.20** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.43** | **0.00** | **0.02** | **0.00** | **0.09** | **0.00** | **0.00** | **0.49** | **0.42** | **0.38** | **0.10** |

*Sources: City of Blaine, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

## Exhibit 31. Developable Nonresidential Land Capacity, Blaine UGA, 2021-2036

| | UGA | GW | HCA | Ma | Mb | Mc | Mpr | PC | PR | RL | R/O | RPR | CB TP-60 | CB M-60 | CB M-48 | CB G-36 | CB WV-36 | HCb | HCc | HCd | CB G-48 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Net Developable Employment Acres (Vacant, PU, UU)** | **165.76** | **14.70** | **16.42** | **15.92** | **66.78** | **8.27** | **0.00** | **1.26** | **18.82** | **0.00** | **1.62** | **7.04** | **0.16** | **0.01** | **0.44** | **0.47** | **0.40** | **3.08** | **2.19** | **0.92** | **0.20** |
| **Commercial Developable Acres** | 71.97 | 14.70 | 16.42 | - | - | - | - | 1.26 | 18.82 | - | 1.62 | 7.04 | 0.16 | 0.01 | 0.44 | 0.47 | 0.40 | 3.08 | 2.19 | 0.92 | 0.20 |
| Assumed Commercial Density (FAR) | | 0.9 | 0.9 | 0.8 | 0.8 | 0.8 | 0.7 | 0.8 | 0.6 | | 0.7 | 0.7 | 1.0 | 1.0 | 1.0 | 0.9 | 1.0 | 0.9 | 0.9 | 0.9 | 0.9 |
| Subtotal: Commercial Capacity (SF) | 2,466,577 | 576,235 | 608,115 | - | - | - | - | 43,790 | 491,993 | - | 49,505 | 214,792 | 6,825 | 413 | 19,010 | 17,314 | 17,396 | 114,111 | 81,215 | 33,946 | 7,290 |
| Existing Commercial Space (SF) | 143,180 | 45,286 | 13,682 | - | - | - | - | 17,773 | - | 160 | 11,177 | - | 1,223 | 2,472 | 18,393 | 1,494 | 2,182 | 5,640 | 3,848 | 2,352 | 5,945 |
| Pending Commercial Space (SF) | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Master Planned Commercial Space (SF) | 225,000 | 37,000 | - | - | - | - | 71,000 | - | 72,000 | - | - | 45,000 | - | - | - | - | - | - | - | - | - |
| Subtotal: Net Commercial Capacity (SF) | 2,558,953 | 567,949 | 594,433 | - | - | - | 71,000 | 26,017 | 563,993 | - | 38,328 | 259,792 | 5,602 | - | 617 | 15,820 | 15,214 | 108,471 | 77,367 | 31,594 | 1,345 |
| Potential Occupied Commercial Space (SF) | 2,431,006 | 539,552 | 564,711 | - | - | - | 67,450 | 24,716 | 535,793 | - | 36,412 | 246,802 | 5,322 | - | 586 | 15,029 | 14,453 | 103,047 | 73,499 | 30,014 | 1,278 |
| Commercial Employment Capacity | 4,578 | 1,016 | 1,063 | - | - | - | 127 | 47 | 1,009 | - | 69 | 465 | 10 | - | 1 | 28 | 27 | 194 | 138 | 57 | 2 |
| **Industrial Developable Acres** | 93.79 | - | - | 15.92 | 66.78 | 8.27 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Assumed Industrial Density (FAR) | | 0.9 | | 0.8 | 0.8 | 0.8 | | | | | | | | | | | | | | | |
| Subtotal: Industrial Capacity (SF) | 3,094,830 | - | - | 520,064 | 2,181,559 | 270,122 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Existing Industrial Space (SF) | 19,761 | - | 1,044 | - | - | 200 | - | - | - | 4,864 | - | - | - | - | - | - | 2,000 | - | 6,253 | - | - |
| Pending Industrial Space (SF) | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Master Planned Industrial Space (SF) | 10,208 | 10,208 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Subtotal: Net Industrial Capacity (SF) | 3,104,838 | 10,208 | - | 520,064 | 2,181,559 | 269,922 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Potential Occupied Industrial Space (SF) | 2,949,596 | 9,698 | - | 494,061 | 2,072,481 | 256,426 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Industrial Employment Capacity | 3,992 | 13 | - | 669 | 2,804 | 347 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Net Commercial & Industrial Capacity (SF) | 5,663,791 | 578,157 | 594,433 | 520,064 | 2,181,559 | 269,922 | 71,000 | 26,017 | 563,993 | - | 38,328 | 259,792 | 5,602 | - | 617 | 15,820 | 15,214 | 108,471 | 77,367 | 31,594 | 1,345 |
| Potential Occupied Commercial & Industrial | 5,380,602 | 549,249 | 564,711 | 494,061 | 2,072,481 | 256,426 | 67,450 | 24,716 | 535,793 | - | 36,412 | 246,802 | 5,322 | - | 586 | 15,029 | 14,453 | 103,047 | 73,499 | 30,014 | 1,278 |
| Employment Capacity | **8,570** | 1,029 | 1,063 | 669 | 2,804 | 347 | 127 | 47 | 1,009 | - | 69 | 465 | 10 | - | 1 | 28 | 27 | 194 | 138 | 57 | 2 |
| Remaining Employment Growth to Accommodate (2021-2036) | 1,578 | | | | | | | | | | | | | | | | | | | | |
| **Employment Capacity Surplus (Deficit)** | **6,992** | | | | | | | | | | | | | | | | | | | | |

*Sources: City of Blaine, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

# 4. Cherry Point UGA

The Cherry Point Urban Growth Area is characterized by and planned for industrial uses. This UGA does not have residential zoning or allocated population growth. The UGA has an employment growth allocation of 774 between 2016 and 2036 (**Exhibit 2**).

## Achieved Growth 2016-2021

Permit data for the Cherry Point UGA is not a sufficient data source to estimate past employment growth. This is because a major employer in the UGA shutdown in 2020. Additionally, the Cherry Point Urban Growth Area is unique in that many of the building permits are not for the more traditional enclosed industrial buildings that have been permitted in other cities and UGAs (building permits at Cherry Point include equipment, pipe supports, platforms, etc.). Therefore, Whatcom County contracted with Western Washington University to provide an employment growth estimate for the review period (*Employment at Cherry Point, June 2021)*. Employment data for 2016 was limited. Therefore, the employment estimate represents growth between 2017 and 2021. Based on these estimates, the Cherry Point UGA declined in employment by 141 (**Exhibit 7**). Cherry Point UGA employment declined between 2016 and 2021 because of job losses associated with the Alcoa Intalco shutdown in 2020.

## Employment Assumptions

Occupancy rate and employment density assumptions for estimating future growth capacity in the Cherry Point UGA are:

- 95.0% Industrial occupancy rate
- 1,779 Industrial square feet per employee

The Cherry Point UGA will need to accommodate 876 more jobs between 2021 and 2036 under current planning assumptions (**Exhibit 7**).

## Employment Capacity 2021-2036

The *Whatcom County Comprehensive Plan* does not have adopted industrial planned densities. Between 2016 and 2021 the Cherry Point UGA has seen an overall achieved industrial FAR of 0.11 (**Exhibit 11**).

Based on achieved densities between 2016 and 2021, Whatcom County is assuming future FARs of 0.10 for the HII zone and 0.12 for the LII zone (**Exhibit 32**).

The Cherry Point UGA has estimated net land capacity for employment growth of 1,152 acres (**Exhibit 33**), with a total estimated potential occupied industrial capacity of over 4.6 million square feet. Based on square feet per employee assumptions, the Cherry Point UGA has an estimated future employment capacity of 2,613, indicating an estimated employment capacity surplus of 1,737 (**Exhibit 34**).

## Regulatory Changes

The County has evaluated development regulations adopted in the review period (April 1, 2016 - March 31, 2021). Only Ordinance 2019-005 could prevent assigned densities from being achieved or impact the quantity of land suitable for development in the remainder of the 20-year planning period (2021-2036). In an e-mail of October 6, 2021, a representative of the Whatcom County Public Works River & Flood Division stated:

> . . . the 2019 revisions were done mainly to reflect updated flood study and the most recent just adopted in 2021 was for compliance with building freeboard required for CRS [Community Rating System] credit, nothing to do with 'supply of land'. That being said, the flood study did change the Base Flood Elevations and floodplain boundaries in those areas and the FEMA Biological Opinion does restrict density in the floodplain. . .

A September 30, 2021 River & Flood Division memo attached to the e-mail states that the Special Flood Hazard Area is:

> . . . designated Critical Area and/or Habitat Conservation Area (HCA) per WCC Title-16. As such, creating additional 'buildable' lots within a Critical Area or HCA may be prohibited. For further information reference WCC 16.16.420 – Frequently Flooded Areas. . .

Pursuant to the *Whatcom County Review and Evaluation Program Methodology*, Whatcom County deducted floodplains from the buildable land supply.

After the end of the review period, the County Council adopted Ordinance 2021-046 prohibiting certain uses and requiring a conditional use permit for certain uses in the Cherry Point UGA. This ordinance also included greenhouse gas provisions in SEPA.

## Infrastructure Gaps

Whatcom County has reviewed capital facility plans and/or consulted with service providers. Based upon these actions, the County has not identified any infrastructure gaps that would

prevent service providers from supplying planned capital facilities to developable land in the Cherry Point UGA within the remaining portion of the planning period (2021-2036).

**Analysis of Comprehensive Plan Objectives and Reasonable Measures**

The Cherry Point UGA experienced negative job growth in the review period because of the Alcoa Intalco shutdown, which resulted in the loss of approximately 662 jobs at this plant (*Employment at Cherry Point, June 2021, page 8)*. The shutdown was a business decision by a large corporation based upon a number of factors, including the global business environment. If not for this shutdown, employment growth in the UGA would have outpaced the growth allocated in the Whatcom County Comprehensive Plan.

Whatcom County Comprehensive Plan Policy 7B-1 states:

> The Port of Bellingham, serving as the ADO [Associate Development Organization], will work with the cities, the County, Chambers of Commerce, educational institutions, and other groups to assist retention and expansion of existing local businesses and to attract appropriate businesses to Whatcom County. . .

The Port of Bellingham is actively working to recruit a business for the Alcoa Intalco property. A reasonable measure is for the Port of Bellingham to continue the recruitment process until a new tenant is found, in order to facilitate job growth as envisioned in the *Whatcom County Comprehensive Plan* and implement Comprehensive Plan Policy 7B-1.

## Commercial and Industrial Development

**Exhibit 32. Nonresidential Development, Achieved and Assumed Densities, Cherry Point UGA, 2016-2021**

| Zoning Designation | Development Type | Acres Developed | Built Square Feet | Achieved Density (FAR) | Assumed Density (FAR) |
|---|---|---|---|---|---|
| HII | Industrial | 8.8 | 39,560 | 0.10 | 0.10 |
| LII | Industrial | 8.0 | 40,991 | 0.12 | 0.12 |

*Sources: Whatcom County, 2022; Community Attributes Inc., 2021.*
*Note: Assumed Density is the assumed density for evaluation of land suitable for development by zone.*

## Exhibit 33. Developable Nonresidential Land Supply, Cherry Point UGA, 2021-2036

| | UGA Total | HII | LII |
|---|---|---|---|
| **Vacant Land** | | | |
| Gross Acres | 3,834.69 | 3,765.09 | 69.60 |
| Critical Areas | 2,188.05 | 2,132.12 | 55.93 |
| Future Public Uses | 10.00 | 10.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 81.83 | 81.15 | 0.68 |
| Infrastructure Deduction | 163.66 | 162.30 | 1.37 |
| Market Factor | 313.01 | 310.39 | 2.62 |
| **Net Acres** | **1,078.14** | **1,069.13** | **9.01** |
| | | | |
| **Partially-Used Land** | | | |
| Gross Acres | 148.42 | 148.42 | 0.00 |
| Critical Areas | 109.30 | 109.30 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 1.96 | 1.96 | 0.00 |
| Infrastructure Deduction | 3.91 | 3.91 | 0.00 |
| Market Factor | 10.81 | 10.81 | 0.00 |
| **Net Acres** | **22.45** | **22.45** | **0.00** |
| | | | |
| **Underutilized Land** | | | |
| Gross Acres | 223.24 | 218.47 | 4.77 |
| Critical Areas | 133.21 | 130.42 | 2.79 |
| Future Public Uses | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 4.50 | 4.40 | 0.10 |
| Infrastructure Deduction | 9.00 | 8.80 | 0.20 |
| Market Factor | 24.87 | 24.32 | 0.55 |
| **Net Acres** | **51.65** | **50.52** | **1.14** |

*Sources: Whatcom County, 2022; Community Attributes Inc., 2021.*

## Exhibit 34. Developable Nonresidential Land Capacity, Cherry Point UGA, 2021-2036

| | UGA | HII | LII |
|---|---|---|---|
| **Net Developable Employment Acres (Vacant, PU, UU)** | **1,152.24** | **1,142.09** | **10.15** |
| **Commercial Developable Acres** | - | - | - |
| Assumed Commercial Density (FAR) | | | |
| Subtotal: Commercial Capacity (SF) | - | - | - |
| Existing Commercial Space (SF) | 11,328 | 11,328 | - |
| Pending Commercial Space (SF) | - | - | - |
| Master Planned Commercial Space (SF) | - | - | - |
| Subtotal: Net Commercial Capacity (SF) | - | - | - |
| Potential Occupied Commercial Space (SF) | - | - | - |
| Commercial Employment Capacity | - | - | - |
| **Industrial Developable Acres** | 1152.24 | 1142.09 | 10.15 |
| Assumed Industrial Density (FAR) | | 0.1 | 0.1 |
| Subtotal: Industrial Capacity (SF) | 5,027,995 | 4,974,958 | 53,037 |
| Existing Industrial Space (SF) | 134,000 | 134,000 | - |
| Pending Industrial Space (SF) | - | - | - |
| Master Planned Industrial Space (SF) | - | - | - |
| Subtotal: Net Industrial Capacity (SF) | 4,893,995 | 4,840,958 | 53,037 |
| Potential Occupied Industrial Space (SF) | 4,649,295 | 4,598,910 | 50,385 |
| Industrial Employment Capacity | 2,613 | 2,585 | 28 |
| Net Commercial & Industrial Capacity (SF) | 4,893,995 | 4,840,958 | 53,037 |
| Potential Occupied Commercial & Industrial | 4,649,295 | 4,598,910 | 50,385 |
| Employment Capacity | **2,613** | 2,585 | 28 |
| Remaining Employment Growth to Accommodate (2021-2036) | 876 | | |
| **Employment Capacity Surplus (Deficit)** | **1,737** | | |

*Sources: Whatcom County, 2022; Community Attributes Inc., 2021.*

## 5. Columbia Valley UGA

The Columbia Valley Urban Growth Area, one of three Non-City UGAs, is projected to reach 4,448 total population and 444 employees by 2036. The UGA has projected growth allocations of 1,170 new residents and 312 new jobs between 2016 and 2036 (**Exhibit 1** and **Exhibit 2**).

### Achieved Growth 2016-2021

Based on permit data collected between 2016 and 2021, occupancy, persons per household and square feet per employee assumptions, new construction in the Columbia Valley UGA accommodated an estimated 271 new residents and 11 new jobs over this five-year period (**Exhibit 6** and **Exhibit 7**).

The Columbia Valley UGA achieved an overall residential density of 4.9 units per net acre between 2016 and 2021. This is within the range of 4.0 to 6.0 units per net acre planned in the *Whatcom County Comprehensive Plan* (**Exhibit 11**).

Whatcom County has not adopted planned densities for commercial or industrial uses. Between 2016 and 2021, the UGA achieved a commercial FAR of 0.05, and did not have industrial development during the period (**Exhibit 11**). The commercial FAR is based upon a limited number of commercial building permits (2) issued between April 1, 2016 and March 31, 2021. One of the 2 building permits was in a commercial zone (the other was in a residential zone). The permit in commercial zone was for a new food bank.

### Population and Employment Assumptions

Occupancy rate and population and employment assumptions for estimating future growth capacity in the Columbia Valley UGA are:

- 88.0% residential occupancy rate
- 95.0% Commercial and Industrial occupancy rate
- 2.90 persons per household
- 532 and 812 respectively Commercial and Industrial square feet per employee

### Population Capacity 2021-2036

The Columbia Valley UGA will need to accommodate 899 more residents and 301 more jobs between 2021 and 2036 under current planning assumptions (**Exhibit 6** and **Exhibit 7**).

Based on achieved densities between 2016 and 2021, Whatcom County is assuming future residential densities of 4.9 units per acre for

both single family and multifamily development (**Exhibit 35**).

The Columbia Valley UGA has estimated net land capacity for population growth of 178.4 acres (**Exhibit 36**), with a total estimated potential occupied unit capacity of 747 dwelling units. Based on persons per household assumptions, the Columbia Valley UGA has an estimated population capacity of 2,167, indicating an estimated population capacity surplus of 1,268 (**Exhibit 37**).

**Housing Needs by Type**

The *Whatcom County Comprehensive Plan* (Chapter 3- Housing, Chart 3 – Estimated Dwelling Units Needed, page 3-8) indicates that the Columbia Valley UGA has a need for 613 new single-family dwelling units during the 2013-2036 planning period (the Comprehensive Plan does not estimate multifamily housing needs for Columbia Valley). The calculation for Chart 3 in the *Whatcom County Comprehensive Plan* included building activity from 2013. Therefore, the analysis below includes permit data from April 1, 2013, even though the planning period for this Buildable Lands Report is from 2016.

- Between April 1, 2013 and March 31, 2021, Whatcom County performed final inspections on 120 single-family and 0 multi-family units in the Columbia UGA. Comparing units built and the needs indicated on Chart 3, the Columbia Valley UGA needs an additional 493 single-family units between 2021 and 2036.
- The Columbia Valley UGA has an estimated 2021-2036 capacity for 840 single-family and 9 multi-family housing units (**Exhibit 37).**

The capacity to accommodate single family residential housing in the Columbia Valley UGA is sufficient to accommodate the single family dwelling units needed in the planning period as established in the *Whatcom County Comprehensive Plan* (Chapter 3- Housing, Chart 3).

**Employment Capacity 2021-2036**

Whatcom County is using an average of the small city FARs for future commercial and industrial development, since there is little or no data on achieved densities in the Columbia Valley UGA (**Exhibit 38**).

The Columbia Valley UGA has estimated net land capacity for employment growth of 33.1 acres (**Exhibit 39**), with a total estimated potential occupied commercial and industrial capacity of 278,205 square feet. Based on square feet per employee assumptions, the

UGA has an estimated employment capacity of 420, indicating an estimated employment capacity surplus of 119 (**Exhibit 40**).

## Regulatory Changes

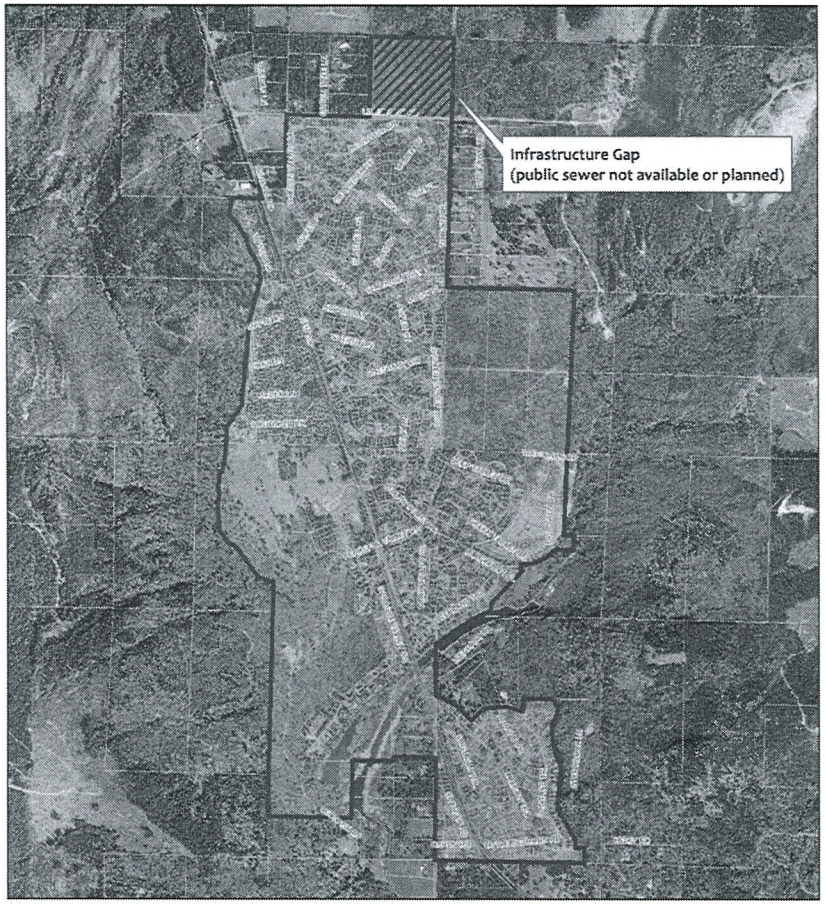
The County has evaluated development regulations adopted in the review period (April 1, 2016 – March 31, 2021). No ordinances adopted during the review period have been identified that would prevent assigned densities from being achieved or impact the quantity of land suitable for development in the remainder of the 20-year planning period (2021-2036).

## Infrastructure Gaps

Whatcom County has reviewed capital facility plans and/or consulted with service providers. Based upon these actions, the County has the following comments on infrastructure gaps that would prevent service providers from supplying planned capital facilities to developable land in the Columbia Valley UGA within the planning period (2021-2036).

Water District 13 is the only sewer purveyor in the UGA. There is no public sewer in parts of the UGA outside of District 13, including the Planned Industrial area north of Limestone Rd. On-site sewage systems may be used in areas with no sewer, which will especially affect the Planned Light Impact Industrial Area. A 30% deduction will be taken from the land in the Planned Light Impact Industrial Area to account for the lack of public sewer. A map of the Columbia Valley UGA showing the land area associated with this deduction is provide below. Residential areas located outside District 13 are platted already and have developed with on-site sewage systems.

Additionally, the Water District 13 Sewer Plan will need to be updated to serve planned growth within its boundaries, as the existing Sewer System Plan only plans for projected population and sewer connections through the year 2029.




## Columbia Valley UGA - Infrastructure Gaps

Legend

Columbia Valley UGA

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## Analysis of Comprehensive Plan Objectives and Reasonable Measures

The Columbia Valley UGA has experienced slow employment growth between 2016 and 2021. The *Whatcom County Comprehensive Plan* employment projection would suggest that about 78 jobs should be created in the Columbia Valley UGA over a given five-year period (Chapter 1, page 1-8). However, the Data Reporting Tool estimates that only 11 jobs were created in the UGA between 2016 and 2021.

The County rezoned land in the UGA from Urban Residential to General Commercial in 2009 to provide land for business within the UGA. There is also a Planned Light Impact Industrial designation in the northern portion of the UGA, but this site has not yet been rezoned to accommodate industry. Therefore, it is not able to accommodate intensive employment growth at this time. A potential reasonable measure the County could consider is rezoning the Planned Light Impact Industrial area for industrial uses as set forth in the *Foothills Subarea Plan* (pages 2-12, 12-4, 12-5, and 12-10).

**Exhibit 35. Residential Development, Achieved and Assumed Densities, Columbia Valley UGA, 2016-2021**

| Zoning Designation | Development Type | Acres Developed | Dwelling Units | Achieved Density (Units/Acre) | Density Assumed (Units/Acre) |
|---|---|---|---|---|---|
| UR4 | Single Family | 22.2 | 109 | 4.91 | 4.91 |
| GC | Multifamily | N/A | N/A | N/A | 4.91 |

*Sources: Whatcom County, 2022; Community Attributes Inc., 2021.*
*Note: "Density Assumed" is the assumed density for evaluation of land suitable for development by zone.*

## Exhibit 36. Residential Land Supply, Columbia Valley UGA, 2021-2036

| | UGA Total | UR4 | GC | RF |
|---|---|---|---|---|
| **Vacant Land** | | | | |
| Gross Acres | 408.37 | 406.02 | 2.35 | 0.00 |
| Critical Areas | 101.05 | 100.94 | 0.11 | 0.00 |
| Future Public Uses | 3.00 | 3.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 15.22 | 15.10 | 0.11 | 0.00 |
| Infrastructure Deduction | 69.70 | 69.48 | 0.22 | 0.00 |
| Market Factor | 52.66 | 52.20 | 0.46 | 0.00 |
| **Net Acres** | **166.74** | **165.29** | **1.45** | **0.00** |
| **Partially-Used Land** | | | | |
| Gross Acres | 29.17 | 29.17 | 0.00 | 0.00 |
| Critical Areas | 6.53 | 6.53 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 1.13 | 1.13 | 0.00 | 0.00 |
| Infrastructure Deduction | 5.21 | 5.21 | 0.00 | 0.00 |
| Market Factor | 4.89 | 4.89 | 0.00 | 0.00 |
| **Net Acres** | **11.41** | **11.41** | **0.00** | **0.00** |
| **Underutilized Land** | | | | |
| Gross Acres | 0.49 | 0.00 | 0.49 | 0.00 |
| Critical Areas | 0.00 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 0.02 | 0.00 | 0.02 | 0.00 |
| Infrastructure Deduction | 0.05 | 0.00 | 0.05 | 0.00 |
| Market Factor | 0.13 | 0.00 | 0.13 | 0.00 |
| **Net Acres** | **0.29** | **0.00** | **0.29** | **0.00** |

*Sources: Whatcom County, 2022; Community Attributes Inc., 2021.*

## Exhibit 37. Developable Residential Land Capacity, Columbia Valley UGA, 2021-2036

| | UGA | UR4 | GC | RF |
|---|---|---|---|---|
| **Net Developable Residential Acres (Vacant, PU, UU)** | **178.45** | **176.71** | **1.74** | **0.00** |
| **Single Family Developable Acres** | 176.71 | 176.71 | - | - |
| Assumed Single Family Density (units/acre) | | 5 | | |
| Subtotal Single Family Unit Capacity | 868 | 868 | - | - |
| Existing Single Family Units | 87 | 86 | 1 | - |
| Pending Single Family Units | 58 | 58 | - | - |
| Master Planned Single Family Units | - | - | - | - |
| Subtotal: Net Single Family Unit Capacity | 840 | 840 | - | - |
| Potential Occupied Single Family Units | 739 | 739 | - | - |
| Single Family Population Capacity | 2,144 | 2,144 | - | - |
| **Multifamily Developable Acres** | 1.74 | - | 1.74 | - |
| Assumed Multifamily Density (units/acre) | | | 5 | |
| Subtotal Multifamily Unit Capacity | 9 | - | 9 | - |
| Existing Multifamily Units | - | - | - | - |
| Pending Multifamily Units | - | - | - | - |
| Master Planned Multifamily Units | - | - | - | - |
| Subtotal: Net Multifamily Unit Capacity | 9 | - | 9 | - |
| Potential Occupied Multifamily Units | 8 | - | 8 | - |
| Multifamily Population Capacity | 23 | - | 23 | - |
| Net Dwelling Unit Capacity | 849 | 840 | 9 | - |
| Potential Occupied Dwelling Units | 747 | 739 | 8 | - |
| **Population Capacity** | **2,167** | 2,144 | 23 | - |
| Remaining Population Growth to Accommodate (2021-2036) | 899 | | | |
| **Population Capacity Surplus (Deficit)** | **1,268** | | | |

*Sources: Whatcom County, 2022; Community Attributes Inc., 2021.*

**Exhibit 38. Nonresidential Development, Achieved and Assumed Densities, Columbia Valley UGA, 2016-2021**

| Zoning Designation | Development Type | Acres Developed | Built Square Feet | Achieved Density (FAR) | Assumed Density (FAR) |
|---|---|---|---|---|---|
| UR4 | Commercial | 0.1 | 864 | 0.27 | N/A |
| GC | Commercial | 2.6 | 5,500 | 0.05 | 0.18 |
| RF | Industrial | N/A | N/A | N/A | 0.22 |

*Sources: Whatcom County, 2022; Community Attributes Inc., 2021.*
*Note: Assumed Density is the assumed density for evaluation of land suitable for development by zone.*

## Exhibit 39. Developable Nonresidential Land Supply, Columbia Valley UGA, 2021-2036

| | UGA Total | UR4 | GC | RF |
|---|---|---|---|---|
| **Vacant Land** | | | | |
| Gross Acres | 59.74 | 0.00 | 21.16 | 38.58 |
| Critical Areas | 0.97 | 0.00 | 0.97 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 11.57 | 0.00 | 0.00 | 11.57 |
| Quasi-Public Use Deduction | 2.36 | 0.00 | 1.01 | 1.35 |
| Infrastructure Deduction | 4.72 | 0.00 | 2.02 | 2.70 |
| Market Factor | 9.63 | 0.00 | 4.12 | 5.51 |
| **Net Acres** | **30.49** | **0.00** | **13.04** | **17.45** |
| | | | | |
| **Partially-Used Land** | | | | |
| Gross Acres | 0.00 | 0.00 | 0.00 | 0.00 |
| Critical Areas | 0.00 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Deduction | 0.00 | 0.00 | 0.00 | 0.00 |
| Market Factor | 0.00 | 0.00 | 0.00 | 0.00 |
| **Net Acres** | **0.00** | **0.00** | **0.00** | **0.00** |
| | | | | |
| **Underutilized Land** | | | | |
| Gross Acres | 4.43 | 0.00 | 4.43 | 0.00 |
| Critical Areas | 0.00 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 0.22 | 0.00 | 0.22 | 0.00 |
| Infrastructure Deduction | 0.44 | 0.00 | 0.44 | 0.00 |
| Market Factor | 1.13 | 0.00 | 1.13 | 0.00 |
| **Net Acres** | **2.64** | **0.00** | **2.64** | **0.00** |

*Sources: Whatcom County, 2022; Community Attributes Inc., 2021.*

## Exhibit 40. Developable Nonresidential Land Capacity, Columbia Valley UGA, 2021-2036

| | UGA | UR4 | GC | RF |
|---|---|---|---|---|
| **Net Developable Employment Acres (Vacant, PU, UU)** | **33.12** | **0.00** | **15.68** | **17.45** |
| | | | | |
| **Commercial Developable Acres** | 15.68 | - | 15.68 | - |
| Assumed Commercial Density (FAR) | | | 0.2 | |
| Subtotal: Commercial Capacity (SF) | 125,658 | - | 125,658 | - |
| Existing Commercial Space (SF) | - | - | - | - |
| Pending Commercial Space (SF) | - | - | - | - |
| Master Planned Commercial Space (SF) | - | - | - | - |
| Subtotal: Net Commercial Capacity (SF) | 125,658 | - | 125,658 | - |
| Potential Occupied Commercial Space (SF) | 119,375 | - | 119,375 | - |
| Commercial Employment Capacity | 224 | - | 224 | - |
| | | | | |
| **Industrial Developable Acres** | 17.45 | - | - | 17.45 |
| Assumed Industrial Density (FAR) | | | | 0.2 |
| Subtotal: Industrial Capacity (SF) | 167,189 | - | - | 167,189 |
| Existing Industrial Space (SF) | - | - | - | - |
| Pending Industrial Space (SF) | - | - | - | - |
| Master Planned Industrial Space (SF) | - | - | - | - |
| Subtotal: Net Industrial Capacity (SF) | 167,189 | - | - | 167,189 |
| Potential Occupied Industrial Space (SF) | 158,830 | - | - | 158,830 |
| Industrial Employment Capacity | 196 | - | - | 196 |
| | | | | |
| Net Commercial & Industrial Capacity (SF) | 292,847 | - | 125,658 | 167,189 |
| Potential Occupied Commercial & Industrial | 278,205 | - | 119,375 | 158,830 |
| Employment Capacity | **420** | - | 224 | 196 |
| | | | | |
| Remaining Employment Growth to Accommodate (2021-2036) | 301 | | | |
| **Employment Capacity Surplus (Deficit)** | **119** | | | |

*Sources: Whatcom County, 2022; Community Attributes Inc., 2021.*

# 6. Everson UGA

The Everson Urban Growth Area is projected to reach a total population and employment of 3,907 and 1,312 respectively by 2036. The UGA has projected growth allocation of 1,080 for population and 523 for employment between 2016 and 2036 (**Exhibit 1** and **Exhibit 2**).

## Achieved Growth 2016-2021

Based on permit data collected between 2016 and 2021 and occupancy and persons per household and square feet per employee assumptions, the Everson UGA grew by an estimated 317 population (100% within the City of Everson) and 16 employment (79% within the City of Everson) (**Exhibit 6** and **Exhibit 7**).

Between 2016 and 2021, the City of Everson achieved densities greater than planned for residential uses, 4.8 units per acre achieved compared to 4.0 planned based in the *Whatcom County Land Capacity Analysis Report* referenced in the *2016 City of Everson Comprehensive Plan*. This achieved residential density also falls within the planned density range of 4.0 to 6.0 units per acre adopted in the *Whatcom County Comprehensive Plan* for the City of Everson. The unincorporated portions of the Everson UGA have seen no residential or commercial development between 2016 and 2021 (**Exhibit 11**).

The City of Everson, in the Comprehensive Plan, references commercial and industrial planned densities based on the *Whatcom County Land Capacity Analysis*. Whatcom County has not adopted planned densities for commercial or industrial uses. Planned commercial and industrial FAR for the Everson UGA are 0.20 and 0.30, respectively. Between 2016 and 2021, incorporated areas of the UGA have achieved a commercial FAR of 0.26, exceeding the adopted FAR. No industrial developed has occurred in the City of Everson between 2016 and 2021. Limited industrial development in the unincorporated portion of the UGA achieved a 0.01 FAR (**Exhibit 11**).

## Population and Employment Assumptions

Specific occupancy rate and population and employment density assumptions for estimating future growth capacity in the Everson UGA are:

- 97.0% Single Family occupancy rate
- 92.8% Multifamily occupancy rate
- 95.0% Commercial and Industrial occupancy rate

- 3.066 Single Family persons per household
- 2.901 Multifamily persons per household
- 800 and 1,501 respectively Commercial and Industrial square feet per employee

The Everson UGA has an estimated 763 population and 507 employment growth remaining to accommodate between 2021 and 2036 (**Exhibit 6** and **Exhibit 7**).

## Population Capacity 2021-2036

The City of Everson is utilizing achieved densities when estimating future residential land capacity. Based on achieved densities between 2016 and 2021 and planning assumptions, City of Everson planners are assuming future single family density of 4.4 units per acre, and 8.5 units per acre for multifamily zones (**Exhibit 41**).

The Everson UGA has estimated net land capacity for population growth of 248.4 acres (**Exhibit 42**), with a total estimated potential occupied unit capacity of 1,203 dwelling units. Based on persons per household assumptions, the UGA has an estimated population capacity of 3,634, indicating an estimated population capacity surplus of 2,871 (**Exhibit 43**).

## Housing Needs by Type

The *Whatcom County Comprehensive Plan* (Chapter 3- Housing, Chart 3 – Estimated Dwelling Units Needed, page 3-8) indicates that Everson has a need for 277 single-family, 129 multi-family, and 28 other ("group housing") new dwelling units during the 2013-2036 planning period. The calculation for Chart 3 in the *Whatcom County Comprehensive Plan* included building activity from 2013. Therefore, the analysis below includes permit data from April 1, 2013, even though the planning period for this Buildable Lands Report is from 2016.

- Between April 1, 2013 and March 31, 2021, Everson issued building permits for 117 single-family and 20 multi-family units. No group housing has been built during this time. Comparing units built and the needs indicated on Chart 3, Everson needs an additional 160 single-family units, 109 multi-family units, and 28 group housing units between 2021 and 2036.

- The City and unincorporated UGA have an estimated 2021-2036 capacity for 904 single-family and 351 multi-family housing units (**Exhibit 43).** The multi-family capacity includes group housing.

These capacities are sufficient to accommodate the dwelling unit types needed in the planning period as established in the Whatcom County Comprehensive Plan (Chapter 3- Housing, Chart 3).

## Employment Capacity 2021-2036

The City of Everson is utilizing achieved densities (when available) when estimating future land capacity for employment. Based on achieved densities between 2016 and 2021 and planning assumptions, City of Everson planners are assuming a future commercial FAR of 0.26 and an industrial FAR of 0.30 (**Exhibit 44**).

The Everson UGA has estimated net land capacity for employment growth of 179.4 acres (**Exhibit 45**), with a total estimated potential occupied commercial and industrial capacity of 2.1 million square feet. Based on square feet per employee assumptions, the Everson UGA has an estimated employment capacity of 1,575, indicating an estimated employment capacity surplus of 1,065 (**Exhibit 46**).

## Regulatory Changes

The City of Everson has not identified any regulatory changes that would prevent assigned densities from being achieved or impact the quantity of land suitable for development during the remainder of the planning period.

## Infrastructure Gaps

The City of Everson has not identified any infrastructure gaps that would prevent assigned densities from being achieved or impact the quantity of land suitable for development during the remainder of the planning period (2021 to 2036).

## Analysis of Comprehensive Plan Objectives and Reasonable Measures

The City of Everson has determined that growth targets and assumptions are being met to a reasonable degree; therefore, an analysis of comprehensive plan development targets, assumptions and objectives is not deemed necessary.

Based on the results presented in the Buildable Land Report, implementation of reasonable measures is not deemed necessary. If in the future it is determined that Reasonable Measures are appropriate, then the following measures could be considered for implementation:

- Increase residential densities by reducing minimum lot sizes in the Residential District above the increases likely to result from

establishment of the Residential-7500 Subzone.

- Increase opportunities for construction of accessory dwelling units (ADUs).

## Residential Development

**Exhibit 41. Residential Development, Achieved and Assumed Densities, City of Everson, 2016-2021**

| Zoning Designation | Development Type | Acres Developed | Dwelling Units | Achieved Density (Units/Acre) | Density Assumed (Units/Acre) |
|---|---|---|---|---|---|
| RES | Single Family | 20.3 | 89 | 4.38 | 4.38 |
| | Multifamily | 0.3 | 2 | 7.14 | N/A |
| RES-7500 | Single Family | N/A | N/A | N/A | 4.38 |
| RMU | Single Family | 0.4 | 3 | 7.33 | N/A |
| | Multifamily | 1.6 | 14 | 8.50 | 8.50 |

*Sources: City of Everson, 2022; Community Attributes Inc., 2021.*
*Note: "Density Assumed" is the assumed density for evaluation of land suitable for development by zone.*

## Exhibit 42. Residential Land Supply, Everson UGA, 2021-2036

| | UGA Total | RES | RES-7500 | RMU | COM | LI |
|---|---|---|---|---|---|---|
| **Vacant Land** | | | | | | |
| Gross Acres | 201.31 | 161.60 | 0.64 | 39.07 | 0.00 | 0.00 |
| Critical Areas | 20.18 | 20.18 | 0.00 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 9.06 | 7.07 | 0.03 | 1.95 | 0.00 | 0.00 |
| Infrastructure Deduction | 9.06 | 7.07 | 0.03 | 1.95 | 0.00 | 0.00 |
| Market Factor | 24.45 | 19.09 | 0.09 | 5.27 | 0.00 | 0.00 |
| **Net Acres** | **138.57** | **108.19** | **0.49** | **29.89** | **0.00** | **0.00** |
| **Partially-Used Land** | | | | | | |
| Gross Acres | 214.57 | 201.09 | 0.00 | 13.48 | 0.00 | 0.00 |
| Critical Areas | 51.84 | 50.37 | 0.00 | 1.48 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 8.14 | 7.54 | 0.00 | 0.60 | 0.00 | 0.00 |
| Infrastructure Deduction | 8.14 | 7.54 | 0.00 | 0.60 | 0.00 | 0.00 |
| Market Factor | 36.61 | 33.91 | 0.00 | 2.70 | 0.00 | 0.00 |
| **Net Acres** | **109.84** | **101.74** | **0.00** | **8.10** | **0.00** | **0.00** |
| **Underutilized Land** | | | | | | |
| Gross Acres | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Critical Areas | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Deduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Market Factor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| **Net Acres** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

*Sources: City of Everson, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

## Exhibit 43. Developable Residential Land Capacity, Everson UGA, 2021-2036

| | UGA | RES | RES-7500 | RMU | COM | LI |
|---|---|---|---|---|---|---|
| **Net Developable Residential Acres (Vacant, PU, UU)** | **248.41** | **209.93** | **0.49** | **37.99** | **0.00** | **0.00** |
| **Single Family Developable Acres** | 210.42 | 209.93 | 0.49 | - | - | - |
| Assumed Single Family Density (units/acre) | | 4 | 4 | | | |
| Subtotal Single Family Unit Capacity | 921 | 919 | 2 | - | - | - |
| Existing Single Family Units | 63 | 37 | - | 5 | 16 | 5 |
| Pending Single Family Units | 20 | 20 | - | - | - | - |
| Master Planned Single Family Units | - | - | - | - | - | - |
| Subtotal: Net Single Family Unit Capacity | 904 | 902 | 2 | - | - | - |
| Potential Occupied Single Family Units | 877 | 875 | 2 | - | - | - |
| Single Family Population Capacity | 2,689 | 2,683 | 6 | - | - | - |
| **Multifamily Developable Acres** | 37.99 | - | - | 37.99 | - | - |
| Assumed Multifamily Density (units/acre) | | | | 9 | | |
| Subtotal Multifamily Unit Capacity | 323 | - | - | 323 | - | - |
| Existing Multifamily Units | - | - | - | - | - | - |
| Pending Multifamily Units | 28 | - | - | 28 | - | - |
| Master Planned Multifamily Units | - | - | - | - | - | - |
| Subtotal: Net Multifamily Unit Capacity | 351 | - | - | 351 | - | - |
| Potential Occupied Multifamily Units | 326 | - | - | 326 | - | - |
| Multifamily Population Capacity | 945 | - | - | 945 | - | - |
| Net Dwelling Unit Capacity | 1,255 | 902 | 2 | 351 | - | - |
| Potential Occupied Dwelling Units | 1,203 | 875 | 2 | 326 | - | - |
| **Population Capacity** | **3,634** | 2,683 | 6 | 945 | - | - |
| Remaining Population Growth to Accommodate (2021-2036) | 763 | | | | | |
| **Population Capacity Surplus (Deficit)** | **2,871** | | | | | |

*Sources: City of Everson, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

## Commercial and Industrial Development

**Exhibit 44. Nonresidential Development, Achieved and Assumed Densities, City of Everson, 2016-2021**

| Zoning Designation | Development Type | Acres Developed | Built Square Feet | Achieved Density (FAR) | Assumed Density (FAR) |
|---|---|---|---|---|---|
| COM | Commercial | 0.9 | 10,825 | 0.26 | 0.26 |
| LI | Industrial | N/A | N/A | N/A | 0.30 |

*Sources: City of Everson, 2022; Community Attributes Inc., 2021.*
*Note: Assumed Density is the assumed density for evaluation of land suitable for development by zone.*

## Exhibit 45. Developable Nonresidential Land Supply, Everson UGA, 2021-2036

| | UGA Total | RES | RES-7500 | RMU | COM | LI |
|---|---|---|---|---|---|---|
| **Vacant Land** | | | | | | |
| Gross Acres | 175.15 | 0.00 | 0.00 | 0.00 | 9.89 | 165.25 |
| Critical Areas | 2.52 | 0.00 | 0.00 | 0.00 | 0.19 | 2.33 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 8.63 | 0.00 | 0.00 | 0.00 | 0.48 | 8.15 |
| Infrastructure Deduction | 8.63 | 0.00 | 0.00 | 0.00 | 0.48 | 8.15 |
| Market Factor | 23.30 | 0.00 | 0.00 | 0.00 | 1.31 | 22.00 |
| **Net Acres** | **132.06** | **0.00** | **0.00** | **0.00** | **7.42** | **124.64** |
| **Partially-Used Land** | | | | | | |
| Gross Acres | 6.20 | 0.00 | 0.00 | 0.00 | 3.52 | 2.68 |
| Critical Areas | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 0.31 | 0.00 | 0.00 | 0.00 | 0.18 | 0.13 |
| Infrastructure Deduction | 0.31 | 0.00 | 0.00 | 0.00 | 0.18 | 0.13 |
| Market Factor | 1.40 | 0.00 | 0.00 | 0.00 | 0.79 | 0.60 |
| **Net Acres** | **4.19** | **0.00** | **0.00** | **0.00** | **2.38** | **1.81** |
| **Underutilized Land** | | | | | | |
| Gross Acres | 79.02 | 0.00 | 0.00 | 0.00 | 26.46 | 52.55 |
| Critical Areas | 15.01 | 0.00 | 0.00 | 0.00 | 0.00 | 15.01 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 3.20 | 0.00 | 0.00 | 0.00 | 1.32 | 1.88 |
| Infrastructure Deduction | 3.20 | 0.00 | 0.00 | 0.00 | 1.32 | 1.88 |
| Market Factor | 14.40 | 0.00 | 0.00 | 0.00 | 5.95 | 8.45 |
| **Net Acres** | **43.20** | **0.00** | **0.00** | **0.00** | **17.86** | **25.34** |

*Sources: City of Everson, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

## Exhibit 46. Developable Nonresidential Land Capacity, Everson UGA, 2021-2036

| | UGA | RES | RES-7500 | RMU | COM | LI |
|---|---|---|---|---|---|---|
| **Net Developable Employment Acres (Vacant, PU, UU)** | **179.45** | **0.00** | **0.00** | **0.00** | **27.66** | **151.79** |
| **Commercial Developable Acres** | 27.66 | - | - | - | 27.66 | - |
| Assumed Commercial Density (FAR) | | | | | 0.3 | |
| Subtotal: Commercial Capacity (SF) | 313,283 | - | - | - | 313,283 | - |
| Existing Commercial Space (SF) | 4,592 | - | - | - | 4,592 | - |
| Pending Commercial Space (SF) | - | - | - | - | - | - |
| Master Planned Commercial Space (SF) | - | - | - | - | - | - |
| Subtotal: Net Commercial Capacity (SF) | 308,691 | - | - | - | 308,691 | - |
| Potential Occupied Commercial Space (SF) | 293,256 | - | - | - | 293,256 | - |
| Commercial Employment Capacity | 367 | - | - | - | 367 | - |
| **Industrial Developable Acres** | 151.79 | - | - | - | - | 151.79 |
| Assumed Industrial Density (FAR) | | | | | | 0.3 |
| Subtotal: Industrial Capacity (SF) | 1,983,592 | - | - | - | - | 1,983,592 |
| Existing Industrial Space (SF) | 84,096 | - | - | - | 9,626 | 74,470 |
| Pending Industrial Space (SF) | - | - | - | - | - | - |
| Master Planned Industrial Space (SF) | - | - | - | - | - | - |
| Subtotal: Net Industrial Capacity (SF) | 1,909,122 | - | - | - | - | 1,909,122 |
| Potential Occupied Industrial Space (SF) | 1,813,666 | - | - | - | - | 1,813,666 |
| Industrial Employment Capacity | 1,208 | - | - | - | - | 1,208 |
| Net Commercial & Industrial Capacity (SF) | 2,217,813 | - | - | - | 308,691 | 1,909,122 |
| Potential Occupied Commercial & Industrial | 2,106,922 | - | - | - | 293,256 | 1,813,666 |
| Employment Capacity | **1,575** | - | - | - | 367 | 1,208 |
| Remaining Employment Growth to Accommodate (2021-2036) | 510 | | | | | |
| **Employment Capacity Surplus (Deficit)** | **1,065** | | | | | |

*Sources: City of Everson, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

## 7. Ferndale UGA

The Ferndale Urban Growth Area is the second largest in the County and is projected to reach a total population and employment of 19,591 and 9,372 respectively by 2036. The UGA has projected growth allocation of 5,942 for population and 3,478 for employment between 2016 and 2036 (**Exhibit 1** and **Exhibit 2**).

### Achieved Growth 2016-2021

Based on permit data collected between 2016 and 2021 and occupancy and persons per household and square feet per employee assumptions, the Ferndale UGA grew by an estimated 2,287 population (99% within the City) and 1,191 employment (95% within the City) (**Exhibit 6** and **Exhibit 7**).

The City of Ferndale has achieved residential densities of 6.4 units per net acre, a commercial FAR of 0.09, and an industrial FAR of 0.20 between 2016 and 2021. Achieved residential densities are greater than the planned densities for residential within the *Whatcom County Comprehensive Plan* of between 6.0 and 10.0 units per net acre. The City of Ferndale has not adopted commercial or industrial planned densities (**Exhibit 11**).

The unincorporated portions of the Ferndale UGA have an achieved residential density of 0.3 units per acre, based on construction of three dwelling units in the 2016-2021 time period (**Exhibit 11**). Densities within the City limits are consistent with county planned urban densities for the City. The unincorporated areas serve as urban growth potential for future growth after annexation, when city zoning is adopted and public water and sewer provided.

### Population and Employment Assumptions

Occupancy rate and population and employment density assumptions for the Ferndale UGA are:

- 96.4% Single Family occupancy rate
- 95.1% Multifamily occupancy rate
- 95.0% Commercial and Industrial occupancy rate
- 2.850 Single Family persons per household
- 2.310 Multifamily persons per household
- 580 and 1,129 respectively Commercial and Industrial square feet per employee

The Ferndale UGA has an estimated 3,661 population and 2,287 employment growth remaining to accommodate between 2021 and 2036 (**Exhibit 6** and **Exhibit 7**).

**Population Capacity 2021-2036**

Based on achieved densities between 2016 and 2021 and planning assumptions, City of Ferndale planners are assuming future single family density between 5.0 and 7.0 units per acre depending on the zone, and between 7.0 and 15.0 units per acre for multifamily zones (**Exhibit 47**).

The Ferndale UGA has estimated net land capacity for population growth of 561.94 acres (**Exhibit 48**), with a total estimated potential occupied unit capacity of 4,310 dwelling units. Based on persons per household assumptions, the UGA has an estimated population capacity of 10,786, indicating an estimated population capacity surplus of 7,125 (**Exhibit 49**).

**Housing Needs by Type**

The *Whatcom County Comprehensive Plan* (Chapter 3- Housing, Chart 3 – Estimated Dwelling Units Needed, page 3-8) indicates that Ferndale has a need for 2,024 single-family, 456 multi-family, and 125 other ("group housing") new dwelling units during the 2013-2036 planning period. The calculation for Chart 3 in the *Whatcom County Comprehensive Plan* included building activity from 2013. Therefore, the analysis below includes permit data from April 1, 2013, even though the planning period for this Buildable Lands Report is from 2016.

- Between April 1, 2013 and March 31, 2021, Ferndale issued building permits for 938 single-family and 585 multi-family units. No group housing, which in Ferndale are assisted living facilities, has been built during this time. Comparing units built and the needs indicated on Chart 3, Ferndale needs to accommodate an additional 1,086 single-family units and 125 group housing units between 2021 and 2036.

- The City and unincorporated UGA have an estimated 2021-2036 capacity for 2,392 single-family and 1,918 multi-family housing units (**Exhibit 49).** The multi-family capacity includes group housing.

These capacities are sufficient to accommodate the dwelling unit types anticipated in the planning period as established in the Whatcom County Comprehensive Plan (Chapter 3-Housing, Chart 3).

## Employment Capacity 2021-2036

Based on achieved densities between 2016 and 2021 and planning assumptions, City of Ferndale planners are assuming a future commercial FAR of 0.09 to 0.20 and an industrial FAR of 0.20 (**Exhibit 50**).

The Ferndale UGA has estimated net land capacity for employment growth of 273.49 acres (**Exhibit 51**), with a total estimated potential occupied commercial and industrial capacity of approximately 2.5 million square feet. Based on square feet per employee assumptions, the Ferndale UGA has an estimated employment capacity of 3,484, indicating an estimated employment capacity surplus of 1,197 (**Exhibit 52**).

## Regulatory Changes

The City has evaluated development regulations adopted in the review period (April 1, 2016 – March 31, 2021). Only Ordinances 1969 and 1976 could prevent assigned densities from being achieved or impact the quantity of land suitable for development in the remainder of the 20-year planning period (2021-2036). Both ordinances adopted new regulations for stormwater treatment within the City, these regulations may impact the ability to meet densities in the City's multifamily zones that have minimum gross densities.

During this period of time the City of Ferndale adopted several ordinances that would assist with realizing increased density within the UGA. Ordinance 1995 allowed for the establishment of Accessory Dwelling Units (ADUs) in all of the City's single family zones. Ordinance 2174 further reduced barriers to the establishment of ADUs by eliminating off-street parking and owner occupancy requirements.

The City of Ferndale created new multifamily zones through the adoption of ordinances 2026 and 2098. Ordinance 2026 established the Residential Multifamily Medium Density zone with a minimum density of 10 dwelling units and a maximum density of 30 dwelling units per gross acre. Ordinance 2098 established the Residential Multifamily High Density Zone with a minimum density of 15 dwelling units per gross acre and no maximum density.

The City of Ferndale also adopted ordinance 2173 which allows duplex and single-family attached duplexes in single family residential zones which the City believes will assist infill development with attaining densities at or near the maximum permitted.

## Infrastructure Gaps

The City of Ferndale has reviewed capital facility plans and/or consulted with service providers. Based upon these actions, the City has not identified any infrastructure gaps that would prevent service providers from supplying planned capital facilities to developable land in the Ferndale UGA.

## Analysis of Comprehensive Plan Objectives and Reasonable Measures

The City of Ferndale has determined that growth targets and assumptions are being met. Therefore, an analysis of comprehensive plan development assumptions, targets, and objectives is not necessary. The City is realizing efficient development of the land within the UGA. The achieved density in the UGA is in part a result of the City establishing minimum densities in all of its residential zones. No inconsistencies between planned and actual growth have been identified in the Ferndale UGA. Therefore, reasonable measures are not required under RCW 36.70A.215.

**Exhibit 47. Residential Development, Achieved and Assumed Densities, City of Ferndale, 2016-2021**

| Zoning Designation | Development Type | Acres Developed | Dwelling Units | Achieved Density (Units/Acre) | Density Assumed (Units/Acre) |
|---|---|---|---|---|---|
| RS High | Single Family | N/A | N/A | N/A | 7.00 |
| RS Medium | Single Family | N/A | N/A | N/A | 6.00 |
| RS Low | Single Family | N/A | N/A | N/A | 5.00 |
| MXD | Single Family | N/A | N/A | N/A | 7.00 |
| | Multifamily | N/A | N/A | N/A | 7.00 |
| RMH | Multifamily | 0.4 | 8 | 22.22 | 15.00 |
| RMM | Single Family | 3.9 | 2 | 0.51 | N/A |
| | Multifamily | 6.0 | 55 | 9.15 | 10.00 |
| RO | Multifamily | 5.5 | 38 | 6.85 | 7.00 |
| GB | Single Family | 2.6 | N/A | 0.00 | N/A |
| UR | Single Family | 0.5 | N/A | 0.00 | N/A |
| | Multifamily | 0.7 | 12 | 17.91 | 15.00 |
| CC | Multifamily | 0.3 | 5 | 15.36 | 12.00 |
| RR | Multifamily | N/A | N/A | N/A | 15.00 |

*Sources: City of Ferndale, 2022; Community Attributes Inc., 2021.*
*Note: "Density Assumed" is the assumed density for evaluation of land suitable for development by zone.*

## Exhibit 48. Residential Land Supply, Ferndale UGA, 2021-2036

| | UGA Total | CC | GB | LI | M | MXD | RMH | RMM | RO | RR | RS High | RS Low | RS Medium | UR |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Vacant Land** | | | | | | | | | | | | | | |
| Gross Acres | 626.73 | 0.00 | 0.00 | 0.00 | 0.00 | 159.88 | 12.31 | 59.41 | 12.95 | 0.00 | 50.45 | 219.47 | 99.91 | 12.33 |
| Critical Areas | 262.06 | 0.00 | 0.00 | 0.00 | 0.00 | 69.41 | 9.78 | 28.40 | 9.04 | 0.00 | 30.52 | 67.45 | 37.60 | 9.85 |
| Future Public Uses | 13.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10.00 | 3.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 17.08 | 0.00 | 0.00 | 0.00 | 0.00 | 4.52 | 0.13 | 1.55 | 0.20 | 0.00 | 1.00 | 6.60 | 2.97 | 0.12 |
| Infrastructure Deduction | 17.08 | 0.00 | 0.00 | 0.00 | 0.00 | 4.52 | 0.13 | 1.55 | 0.20 | 0.00 | 1.00 | 6.60 | 2.97 | 0.12 |
| Market Factor | 46.13 | 0.00 | 0.00 | 0.00 | 0.00 | 12.21 | 0.34 | 4.19 | 0.53 | 0.00 | 2.69 | 17.82 | 8.01 | 0.34 |
| **Net Acres** | **261.39** | **0.00** | **0.00** | **0.00** | **0.00** | **69.21** | **1.94** | **23.72** | **2.99** | **0.00** | **15.25** | **101.01** | **45.38** | **1.90** |
| **Partially-Used Land** | | | | | | | | | | | | | | |
| Gross Acres | 664.19 | 0.00 | 0.00 | 0.00 | 0.00 | 6.06 | 0.00 | 6.73 | 0.44 | 0.00 | 40.29 | 462.56 | 148.12 | 0.00 |
| Critical Areas | 219.43 | 0.00 | 0.00 | 0.00 | 0.00 | 0.97 | 0.00 | 0.49 | 0.00 | 0.00 | 24.27 | 133.83 | 59.87 | 0.00 |
| Future Public Uses | 5.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 5.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 19.40 | 0.00 | 0.00 | 0.00 | 0.00 | 0.25 | 0.00 | 0.31 | 0.02 | 0.00 | 0.80 | 13.60 | 4.41 | 0.00 |
| Infrastructure Deduction | 19.40 | 0.00 | 0.00 | 0.00 | 0.00 | 0.25 | 0.00 | 0.31 | 0.02 | 0.00 | 0.80 | 13.60 | 4.41 | 0.00 |
| Market Factor | 87.30 | 0.00 | 0.00 | 0.00 | 0.00 | 1.14 | 0.00 | 1.40 | 0.10 | 0.00 | 3.60 | 61.19 | 19.86 | 0.00 |
| **Net Acres** | **261.89** | **0.00** | **0.00** | **0.00** | **0.00** | **3.43** | **0.00** | **4.21** | **0.30** | **0.00** | **10.81** | **183.58** | **59.57** | **0.00** |
| **Underutilized Land** | | | | | | | | | | | | | | |
| Gross Acres | 76.26 | 0.00 | 0.00 | 0.00 | 0.00 | 32.61 | 5.77 | 27.11 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10.77 |
| Critical Areas | 18.99 | 0.00 | 0.00 | 0.00 | 0.00 | 9.25 | 0.07 | 5.83 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 3.84 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 2.86 | 0.00 | 0.00 | 0.00 | 0.00 | 1.17 | 0.28 | 1.06 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.35 |
| Infrastructure Deduction | 2.86 | 0.00 | 0.00 | 0.00 | 0.00 | 1.17 | 0.28 | 1.06 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.35 |
| Market Factor | 12.89 | 0.00 | 0.00 | 0.00 | 0.00 | 5.26 | 1.28 | 4.79 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 1.56 |
| **Net Acres** | **38.66** | **0.00** | **0.00** | **0.00** | **0.00** | **15.77** | **3.85** | **14.36** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **4.68** |

*Sources: City of Ferndale, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

## Exhibit 49. Developable Residential Land Capacity, Ferndale UGA, 2021-2036

| | UGA | CC | GB | LI | M | MXD | RMH | RMM | RO | RR | RS High | RS Low | RS Medium | UR |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Net Developable Residential Acres (Vacant, PU, UU)** | **561.94** | **0.00** | **0.00** | **0.00** | **0.00** | **88.41** | **5.78** | **42.29** | **3.29** | **0.00** | **26.06** | **284.58** | **104.95** | **6.58** |
| **Single Family Developable Acres** | 428.22 | - | - | - | - | 12.63 | - | - | - | - | 26.06 | 284.58 | 104.95 | - |
| Assumed Single Family Density (units/acre) | | | | | | 7 | | | | | 7 | 5 | 6 | |
| Subtotal Single Family Unit Capacity | 2,323 | - | - | - | - | 88 | - | - | - | - | 182 | 1,423 | 630 | - |
| Existing Single Family Units | 363 | 13 | 51 | 4 | 4 | 19 | 24 | 30 | 1 | 2 | 12 | 80 | 82 | 41 |
| Pending Single Family Units | 262 | 3 | 3 | - | - | 150 | - | - | - | - | 6 | 82 | 18 | - |
| Master Planned Single Family Units | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Subtotal: Net Single Family Unit Capacity | 2,392 | 3 | 3 | - | - | 219 | - | - | - | - | 176 | 1,425 | 566 | - |
| Potential Occupied Single Family Units | 2,306 | 3 | 3 | - | - | 211 | - | - | - | - | 170 | 1,374 | 546 | - |
| Single Family Population Capacity | 6,572 | 8 | 8 | - | - | 602 | - | - | - | - | 484 | 3,915 | 1,555 | - |
| **Multifamily Developable Acres** | 133.72 | - | - | - | - | 75.78 | 5.78 | 42.29 | 3.29 | - | - | - | - | 6.58 |
| Assumed Multifamily Density (units/acre) | | 12 | | | | 7 | 15 | 10 | 7 | 15 | | | | 15 |
| Subtotal Multifamily Unit Capacity | 1,162 | - | - | - | - | 530 | 87 | 423 | 23 | - | - | - | - | 99 |
| Existing Multifamily Units | 180 | 4 | 16 | - | - | 5 | 7 | 131 | - | - | - | - | - | 17 |
| Pending Multifamily Units | 916 | 149 | - | - | - | 416 | 116 | 190 | - | - | - | - | - | 45 |
| Master Planned Multifamily Units | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Subtotal: Net Multifamily Unit Capacity | 1,918 | 149 | - | - | - | 941 | 196 | 482 | 23 | - | - | - | - | 127 |
| Potential Occupied Multifamily Units | 1,824 | 142 | - | - | - | 895 | 186 | 458 | 22 | - | - | - | - | 121 |
| Multifamily Population Capacity | 4,214 | 327 | - | - | - | 2,067 | 431 | 1,059 | 51 | - | - | - | - | 279 |
| Net Dwelling Unit Capacity | 4,310 | 152 | 3 | - | - | 1,160 | 196 | 482 | 23 | - | 176 | 1,425 | 566 | 127 |
| Potential Occupied Dwelling Units | 4,130 | 145 | 3 | - | - | 1,106 | 186 | 458 | 22 | - | 170 | 1,374 | 546 | 121 |
| **Population Capacity** | **10,786** | 335 | 8 | - | - | 2,669 | 431 | 1,059 | 51 | - | 484 | 3,915 | 1,555 | 279 |
| Remaining Population Growth to Accommodate (2021-2036) | 3,661 | | | | | | | | | | | | | |
| **Population Capacity Surplus (Deficit)** | **7,125** | | | | | | | | | | | | | |

*Sources: City of Ferndale, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

## Commercial and Industrial Development

**Exhibit 50. Nonresidential Development, Achieved and Assumed Densities, City of Ferndale, 2016-2021**

| Zoning Designation | Development Type | Acres Developed | Built Square Feet | Achieved Density (FAR) | Assumed Density (FAR) |
|---|---|---|---|---|---|
| MXD | Commercial | N/A | N/A | N/A | 0.09 |
| RO | Commercial | N/A | N/A | N/A | 0.09 |
| GB | Commercial | 90.7 | 307,415 | 0.08 | 0.09 |
| | Industrial | 39.4 | 269,619 | 0.16 | 0.15 |
| M | Commercial | N/A | N/A | N/A | N/A |
| | Industrial | N/A | N/A | N/A | 0.20 |
| LI | Industrial | 5.5 | 103,994 | 0.44 | 0.20 |
| UR | Commercial | 0.3 | 7,061 | 0.49 | 0.09 |
| CC | Commercial | 0.1 | 156 | 0.03 | 0.50 |
| RR | Commercial | N/A | N/A | N/A | 0.15 |
| | Industrial | N/A | N/A | N/A | 0.15 |

*Sources: City of Ferndale, 2022; Community Attributes Inc., 2021.*
*Note: Assumed Density is the assumed density for evaluation of land suitable for development by zone.*

## Exhibit 51. Developable Nonresidential Land Supply, Ferndale UGA, 2021-2036

| | UGA Total | CC | GB | LI | M | MXD | Pub | RMH | RMM | RO | RR | RS Low | RS Medium | UR |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Vacant Land** | | | | | | | | | | | | | | |
| Gross Acres | 609.33 | 2.61 | 265.11 | 47.23 | 130.31 | 68.52 | 8.20 | 0.00 | 0.00 | 3.24 | 82.73 | 0.00 | 0.00 | 1.37 |
| Critical Areas | 279.58 | 1.72 | 100.25 | 31.28 | 91.63 | 29.75 | 1.58 | 0.00 | 0.00 | 2.26 | 20.01 | 0.00 | 0.00 | 1.09 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 77.98 | 0.00 | 77.98 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 12.59 | 0.04 | 4.34 | 0.80 | 1.93 | 1.94 | 0.33 | 0.00 | 0.00 | 0.05 | 3.14 | 0.00 | 0.00 | 0.01 |
| Infrastructure Deduction | 12.59 | 0.04 | 4.34 | 0.80 | 1.93 | 1.94 | 0.33 | 0.00 | 0.00 | 0.05 | 3.14 | 0.00 | 0.00 | 0.01 |
| Market Factor | 33.99 | 0.12 | 11.73 | 2.15 | 5.22 | 5.23 | 0.89 | 0.00 | 0.00 | 0.13 | 8.47 | 0.00 | 0.00 | 0.04 |
| **Net Acres** | **192.61** | **0.68** | **66.46** | **12.20** | **29.59** | **29.66** | **5.06** | **0.00** | **0.00** | **0.75** | **47.98** | **0.00** | **0.00** | **0.21** |
| **Partially-Used Land** | | | | | | | | | | | | | | |
| Gross Acres | 141.41 | 0.00 | 105.28 | 9.19 | 24.24 | 2.60 | 0.00 | 0.00 | 0.00 | 0.11 | 0.00 | 0.00 | 0.00 | 0.00 |
| Critical Areas | 53.74 | 0.00 | 38.18 | 7.02 | 8.13 | 0.42 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 36.18 | 0.00 | 36.18 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 2.57 | 0.00 | 1.55 | 0.11 | 0.81 | 0.11 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Deduction | 2.57 | 0.00 | 1.55 | 0.11 | 0.81 | 0.11 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 |
| Market Factor | 11.58 | 0.00 | 6.96 | 0.49 | 3.62 | 0.49 | 0.00 | 0.00 | 0.00 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 |
| **Net Acres** | **34.75** | **0.00** | **20.87** | **1.46** | **10.87** | **1.47** | **0.00** | **0.00** | **0.00** | **0.07** | **0.00** | **0.00** | **0.00** | **0.00** |
| **Underutilized Land** | | | | | | | | | | | | | | |
| Gross Acres | 213.28 | 2.29 | 124.32 | 39.76 | 9.30 | 13.98 | 0.00 | 0.00 | 0.00 | 0.00 | 22.45 | 0.00 | 0.00 | 1.20 |
| Critical Areas | 68.38 | 0.23 | 44.30 | 16.15 | 2.77 | 3.96 | 0.00 | 0.00 | 0.00 | 0.00 | 0.55 | 0.00 | 0.00 | 0.43 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 76.56 | 0.00 | 76.56 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 3.42 | 0.10 | 0.17 | 1.18 | 0.33 | 0.50 | 0.00 | 0.00 | 0.00 | 0.00 | 1.10 | 0.00 | 0.00 | 0.04 |
| Infrastructure Deduction | 3.42 | 0.10 | 0.17 | 1.18 | 0.33 | 0.50 | 0.00 | 0.00 | 0.00 | 0.00 | 1.10 | 0.00 | 0.00 | 0.04 |
| Market Factor | 15.38 | 0.46 | 0.78 | 5.31 | 1.47 | 2.25 | 0.00 | 0.00 | 0.00 | 0.00 | 4.93 | 0.00 | 0.00 | 0.17 |
| **Net Acres** | **46.13** | **1.39** | **2.34** | **15.94** | **4.41** | **6.76** | **0.00** | **0.00** | **0.00** | **0.00** | **14.78** | **0.00** | **0.00** | **0.52** |

*Sources: City of Ferndale, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

## Exhibit 52. Developable Nonresidential Land Capacity, Ferndale UGA, 2021-2036

| | UGA | CC | GB | LI | M | MXD | Pub | RMH | RMM | RO | RR | RS Low | RS Medium | UR |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Net Developable Employment Acres (Vacant, PU, UU)** | **273.49** | **2.07** | **89.67** | **29.60** | **44.87** | **37.89** | **5.06** | **0.00** | **0.00** | **0.82** | **62.77** | **0.00** | **0.00** | **0.73** |
| **Commercial Developable Acres** | 199.01 | 2.07 | 89.67 | - | - | 37.89 | 5.06 | - | - | 0.82 | 62.77 | - | - | 0.73 |
| Assumed Commercial Density (FAR) | | 0.5 | 0.1 | | | 0.1 | 0.1 | | | 0.1 | 0.2 | | | 0.1 |
| Subtotal: Commercial Capacity (SF) | 981,204 | 45,050 | 351,548 | - | - | 148,545 | 19,847 | - | - | 3,220 | 410,128 | - | - | 2,866 |
| Existing Commercial Space (SF) | 48,652 | 9,518 | 9,839 | - | 1,700 | 17,523 | - | - | 4,610 | - | - | - | 1,200 | 4,262 |
| Pending Commercial Space (SF) | 742,332 | 5,000 | 674,886 | - | - | 54,446 | - | - | - | - | - | - | - | 8,000 |
| Master Planned Commercial Space (SF) | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Subtotal: Net Commercial Capacity (SF) | 1,683,790 | 40,532 | 1,016,595 | - | - | 185,468 | 19,847 | - | - | 3,220 | 410,128 | - | - | 8,000 |
| Potential Occupied Commercial Space (SF) | 1,599,601 | 38,505 | 965,766 | - | - | 176,195 | 18,855 | - | - | 3,059 | 389,622 | - | - | 7,600 |
| Commercial Employment Capacity | 2,758 | 66 | 1,665 | - | - | 304 | 33 | - | - | 5 | 672 | - | - | 13 |
| **Industrial Developable Acres** | 74.48 | - | - | 29.60 | 44.87 | - | - | - | - | - | - | - | - | - |
| Assumed Industrial Density (FAR) | | | 0.2 | 0.2 | 0.2 | | | | | | 0.2 | | | |
| Subtotal: Industrial Capacity (SF) | 648,830 | - | - | 257,902 | 390,928 | - | - | - | - | - | - | - | - | - |
| Existing Industrial Space (SF) | 123,676 | - | 24,919 | 4,000 | 29,076 | 60,939 | - | 1,984 | - | - | - | 1,200 | - | 1,558 |
| Pending Industrial Space (SF) | 246,662 | - | 215,806 | - | 30,856 | - | - | - | - | - | - | - | - | - |
| Master Planned Industrial Space (SF) | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Subtotal: Net Industrial Capacity (SF) | 862,416 | - | 215,806 | 253,902 | 392,708 | - | - | - | - | - | - | - | - | - |
| Potential Occupied Industrial Space (SF) | 819,295 | - | 205,016 | 241,207 | 373,073 | - | - | - | - | - | - | - | - | - |
| Industrial Employment Capacity | 726 | - | 182 | 214 | 330 | - | - | - | - | - | - | - | - | - |
| Net Commercial & Industrial Capacity (SF) | 2,546,206 | 40,532 | 1,232,401 | 253,902 | 392,708 | 185,468 | 19,847 | - | - | 3,220 | 410,128 | - | - | 8,000 |
| Potential Occupied Commercial & Industrial | 2,418,896 | 38,505 | 1,170,781 | 241,207 | 373,073 | 176,195 | 18,855 | - | - | 3,059 | 389,622 | - | - | 7,600 |
| Employment Capacity | **3,484** | 66 | 1,847 | 214 | 330 | 304 | 33 | - | - | 5 | 672 | - | - | 13 |
| Remaining Employment Growth to Accommodate (2021-2036) | 2,287 | | | | | | | | | | | | | |
| **Employment Capacity Surplus (Deficit)** | **1,197** | | | | | | | | | | | | | |

*Sources: City of Ferndale, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

## 8. Lynden UGA

The Lynden Urban Growth Area is projected to reach a total population and employment of 19,275 and 7,103 respectively by 2036. The UGA has projected allocation of 5,568 for population growth and 1,876 for employment growth between 2016 and 2036 (**Exhibit 1** and **Exhibit 2**).

**Achieved Growth 2016-2021**

Based on permit data collected between 2016 and 2021 and occupancy and persons per household and square feet per employee assumptions, the Lynden UGA grew by an estimated 1,668 people (nearly 100% within the City of Lynden) and 622 jobs (100% within the City) (**Exhibit 6** and **Exhibit 7**).

The City of Lynden has an overall achieved residential density of 7.1 units per acre between 2016 and 2021. Lynden's single-family zones have built out at 4.3 units per acre, its multi-family zones achieved 13.3 units per acre. The overall achieved residential density of 7.1 units per net acre is greater than the adopted planned density of 5.0 units per acre in the *2016 City of Lynden Comprehensive Plan*. The overall achieved residential density also falls within the adopted planned residential density for the City of Lynden of 6.0 to 10.0 units per net acre in the *Whatcom County Comprehensive Plan* (**Exhibit 11**).

The unincorporated portions of the Lynden UGA have an achieved residential density of 1.7 units per acre (**Exhibit 11**). This density, which is based on construction of one dwelling unit in the 2016-2021 time period, lags county planned urban densities for the City. Land in the UGA, outside of City limits, is currently zoned for Agriculture or urban residential uses. The Agriculture zone does not allow urban densities. This land would need to be rezoned for urban land uses and served with public water and sewer, which typically occurs upon annexation. The urban residential zones in the unincorporated portion of the UGA do not allow urban densities until public water and sewer are available, which typically occurs upon annexation. These unincorporated areas serve as future urban growth potential. Until annexation, they do not have access to City infrastructure or urban densities.

Neither the City of Lynden nor Whatcom County have adopted planned densities for commercial or industrial development. Between 2016 and 2021, commercial development in the City of Lynden achieved an overall FAR of 0.12. Totals for commercial development are skewed by one project – the

construction of the new Lynden Middle School on a 30-acre vacant parcel. That one project accounted for 60% of the built commercial square footage during this time. Industrial development saw an overall FAR of 0.26. This was largely driven by construction associated with Lynden Door, Inc expansion and the new cold storage plants built to store agricultural products. More than 400,000 square feet of new industrial space was built in the city limits during this time. The unincorporated areas of the Lynden UGA did not see any commercial or industrial development (**Exhibit 11**).

## Population and Employment Assumptions

Specific occupancy rate and population and employment density assumptions for estimating future growth capacity in the Lynden UGA are:

- 98.0% Single Family occupancy rate
- 95.0% Multifamily occupancy rate
- 95.0% Commercial and Industrial occupancy rate
- 2.88 Single Family persons per household
- 1.70 Multifamily persons per household
- 721 and 1,037 respectively Commercial and Industrial square feet per employee

Based on estimated growth since 2016 and population and employment projections adopted in the *Whatcom County Comprehensive Plan*, the Lynden UGA is expected to accommodate another 3,900 people and 1,254 jobs between 2021 and 2036 (**Exhibit 6** and **Exhibit 7**).

## Population Capacity 2021-2036

Based on achieved densities between 2016 and 2021 and planning assumptions, City of Lynden planners are assuming future single family density of 4.0 and 8.0 units per acre depending on the zone. Assumed multifamily densities range between 8.0 and 24.0 units per acre (**Exhibit 53**).

The Lynden UGA has an estimated net land capacity for population growth of 459.5 acres (**Exhibit 54**), with a total estimated potential occupied unit capacity of 3,481 dwelling units. Based on persons per household assumptions, the UGA has an estimated population capacity of 8,467, indicating an estimated population capacity surplus of 4,567 (**Exhibit 55).**

## Housing Needs by Type

The *Whatcom County Comprehensive Plan* (Chapter 3- Housing, Chart 3 – Estimated Dwelling Units Needed, page 3-8) indicates that Lynden has a need for 1,887 single-family, 627 multi-family, and 97 other ("group housing") new dwelling units during the 2013-2036 planning period. The calculation for Chart 3 in the *Whatcom County Comprehensive Plan* included building activity from 2013. Therefore, the analysis below includes permit data from April 1, 2013, even though the planning period for this Buildable Lands Report is from 2016.

- Between April 1, 2013 and March 31, 2021, Lynden issued building permits for 652 single-family and 539 multi-family units. No group housing, which in Lynden are assisted living facilities, has been built during this time. Comparing units built and the needs indicated on Chart 3, Lynden needs an additional 1,235 single-family units, 88 multi-family units, and 97 group housing units between 2021 and 2036.

- The City and unincorporated UGA have an estimated 2021-2036 capacity for 2,204 single-family and 1,391 multi-family housing units (**Exhibit 55).** The multi-family capacity includes group housing. These capacities are sufficient to accommodate the dwelling unit types needed in the planning period as established in the Whatcom County Comprehensive Plan (Chapter 3- Housing, Chart 3).

## Employment Capacity 2021-2036

Looking forward, Lynden is assuming a FAR of 0.184 for future commercial development. This number (0.184) is the average achieved commercial FAR for all the small cities in the County between 2016-2021. Lynden is using this assumption, which is different than its achieved commercial FAR of 0.12 because Lynden's achieved commercial development data during this time was skewed by the Lynden Middle School project. Additionally, Lynden is assuming a FAR of 0.26 for future industrial development. This is what was achieved for industrial development between 2016-2021 (**Exhibit 56**).

The Lynden UGA has an estimated net land capacity for employment growth of 388.4 acres (**Exhibit 57**), with a total estimated potential occupied commercial and industrial capacity of 4.0 million square feet. Based on square feet per employee assumptions, the Lynden UGA has an estimated employment capacity of 4,038, indicating an estimated employment capacity surplus of 2,784 (**Exhibit 58**).

## Regulatory Changes

Since 2016, the City of Lynden has approved several regulatory changes that impact either the amount of land available for development, or the densities and types of development allowed on buildable lands. These regulatory changes are documented in the Data Reporting Tool worksheet.

Three annexations brought more than 90 acres of unincorporated UGA into the City, the largest (80 acres) of which is in the Pepin Creek Subarea, the area expected to house the majority of incoming residents during the remainder of the planning period. Subsequently, the City adopted the Pepin Creek Subarea Plan which established zoning designations (including the RM-PC zone which is a new multifamily zone), development densities (including minimum density requirements), transportation routes, and recreational and open space opportunities within this 460-acre subarea.

Multiple rezones and Comprehensive Plan Amendments have been approved that are adapting to employment growth needs (i.e. increasing Industrial lands) and, in general, trend toward rezoning land to increase residential densities.

The City updated its Critical Areas Ordinance and Shoreline Master Program, which regulate potential impacts to environmental resources. These regulations restrict development in protected locations, as they establish buffers, setbacks, and the regulatory process for protecting these resources. The City has considered known critical areas and their buffers in its evaluation of population and employment growth and determined that the land supply can still accommodate projected growth during the remainder of the planning period.

Finally, other regulatory updates expanded the allowed types of commercial uses in commercial zones and business parks, incentivized low impact development techniques, and eased restrictions for making an accessory dwelling unit legal on residential properties.

## Infrastructure Gaps

The City of Lynden has reviewed capital facility plans and/or consulted with service providers that will provide service for future growth. Based on this review, Lynden has not identified infrastructure gaps that would prevent service providers from supplying planned capital facilities to developable land in the Lynden UGA within the planning period (2021-2036).

## Analysis of Comprehensive Plan Objectives and Reasonable Measures

The City of Lynden has determined that growth targets and assumptions are being met. Therefore, an analysis of comprehensive plan development assumptions, targets, and objectives is not necessary. No inconsistencies between planned and actual growth have been identified in the Lynden UGA. Therefore, reasonable measures are not required under RCW 36.70A.215.

**Exhibit 53. Residential Development, Achieved and Assumed Densities, City of Lynden, 2016-2021**

| Zoning Designation | Development Type | Acres Developed | Dwelling Units | Achieved Density (Units/Acre) | Density Assumed (Units/Acre) |
|---|---|---|---|---|---|
| RS-100 | Single Family | 25.9 | 93 | 3.59 | 4.00 |
| | Multifamily | 0.4 | 4 | 8.97 | N/A |
| RS-84 | Single Family | 0.4 | 2 | 4.82 | 4.50 |
| RS-72 | Single Family | 41.8 | 236 | 5.65 | 5.00 |
| RMD | Single Family | 8.7 | 16 | 1.84 | 8.00 |
| | Multifamily | 0.7 | 9 | 12.42 | N/A |
| MH | Single Family | N/A | 1 | N/A | N/A |
| RM-1 | Single Family | 0.5 | 5 | 10.90 | N/A |
| | Multifamily | 1.7 | 14 | 8.36 | 8.00 |
| RM-2 | Single Family | 2.1 | 11 | 5.29 | N/A |
| | Multifamily | 1.5 | 17 | 11.01 | 12.00 |
| RM-3 | Single Family | 6.4 | 49 | 7.60 | N/A |
| | Multifamily | 10.0 | 144 | 14.34 | 16.00 |
| RM-4 | Multifamily | 0.7 | 12 | 16.76 | 24.00 |
| RM-PC | Multifamily | N/A | N/A | N/A | 12.00 |
| CSL | Multifamily | 3.3 | 116 | 35.23 | N/A |
| HBD | Multifamily | 0.2 | 9 | 50.01 | N/A |

*Sources: City of Lynden, 2022; Community Attributes Inc., 2021.*
*Note: "Density Assumed" is the assumed density for evaluation of land suitable for development by zone.*

## Exhibit 54. Residential Land Supply, Lynden UGA, 2021-2036

| | UGA Total | RS-100 | RS-84 | RS-72 | RMD | MH | RM-1 | RM-2 | RM-3 | RM-4 | RM-PC | CSR | CSL | ID | IBZ |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Vacant Land** | | | | | | | | | | | | | | | |
| Gross Acres | 345.52 | 49.26 | 0.00 | 52.72 | 140.61 | 0.00 | 0.42 | 22.74 | 0.27 | 3.82 | 75.69 | 0.00 | 0.00 | 0.00 | 0.00 |
| Critical Areas | 69.30 | 19.58 | 0.00 | 3.65 | 19.06 | 0.00 | 0.00 | 8.65 | 0.00 | 0.00 | 18.37 | 0.00 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 1.28 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 1.28 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 13.75 | 1.48 | 0.00 | 2.45 | 6.08 | 0.00 | 0.02 | 0.64 | 0.01 | 0.19 | 2.87 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Deduction | 13.75 | 1.48 | 0.00 | 2.45 | 6.08 | 0.00 | 0.02 | 0.64 | 0.01 | 0.19 | 2.87 | 0.00 | 0.00 | 0.00 | 0.00 |
| Market Factor | 37.12 | 4.01 | 0.00 | 6.62 | 16.41 | 0.00 | 0.06 | 1.73 | 0.04 | 0.52 | 7.74 | 0.00 | 0.00 | 0.00 | 0.00 |
| **Net Acres** | **210.33** | **22.71** | **0.00** | **37.54** | **92.98** | **0.00** | **0.32** | **9.80** | **0.20** | **2.92** | **43.86** | **0.00** | **0.00** | **0.00** | **0.00** |
| **Partially-Used Land** | | | | | | | | | | | | | | | |
| Gross Acres | 426.03 | 81.78 | 0.00 | 70.51 | 161.34 | 19.21 | 0.00 | 58.46 | 29.62 | 5.11 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Critical Areas | 68.26 | 13.28 | 0.00 | 7.60 | 4.58 | 8.69 | 0.00 | 18.96 | 14.71 | 0.44 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.28 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.28 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 17.88 | 3.43 | 0.00 | 3.15 | 7.84 | 0.53 | 0.00 | 1.97 | 0.73 | 0.23 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Deduction | 17.88 | 3.43 | 0.00 | 3.15 | 7.84 | 0.53 | 0.00 | 1.97 | 0.73 | 0.23 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Market Factor | 80.44 | 15.41 | 0.00 | 14.15 | 35.27 | 2.37 | 0.00 | 8.89 | 3.29 | 1.05 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| **Net Acres** | **241.31** | **46.24** | **0.00** | **42.46** | **105.81** | **7.10** | **0.00** | **26.66** | **9.88** | **3.15** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |
| **Underutilized Land** | | | | | | | | | | | | | | | |
| Gross Acres | 11.59 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 1.20 | 10.38 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Critical Areas | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 0.58 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.06 | 0.52 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Deduction | 0.58 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.06 | 0.52 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Market Factor | 2.61 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.27 | 2.34 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| **Net Acres** | **7.82** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.81** | **7.01** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

*Sources: City of Lynden, 2022; Community Attributes Inc., 2021.*

## Exhibit 55. Developable Residential Land Capacity, Lynden UGA, 2021-2036

| | UGA | RS-100 | RS-84 | RS-72 | RMD | MH | RM-1 | RM-2 | RM-3 | RM-4 | RM-PC | CSR | CSL | ID | IBZ |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Net Developable Residential Acres (Vacant, PU, UU)** | **459.46** | **68.95** | **0.00** | **80.00** | **198.80** | **7.10** | **0.32** | **37.28** | **17.09** | **6.07** | **43.86** | **0.00** | **0.00** | **0.00** | **0.00** |
| **Single Family Developable Acres** | 354.85 | 68.95 | - | 80.00 | 198.80 | 7.10 | - | - | - | - | - | - | - | - | - |
| Assumed Single Family Density (units/acre) | | 4 | 5 | 5 | 8 | | | | | | | | | | |
| Subtotal Single Family Unit Capacity | 2,266 | 276 | - | 400 | 1,590 | - | - | - | - | - | - | - | - | - | - |
| Existing Single Family Units | 167 | 33 | - | 24 | 5 | 29 | - | 19 | 12 | - | - | 23 | 20 | 1 | 1 |
| Pending Single Family Units | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Master Planned Single Family Units | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Subtotal: Net Single Family Unit Capacity | 2,204 | 243 | - | 376 | 1,585 | - | - | - | - | - | - | - | - | - | - |
| Potential Occupied Single Family Units | 2,160 | 238 | - | 368 | 1,553 | - | - | - | - | - | - | - | - | - | - |
| Single Family Population Capacity | 6,221 | 686 | - | 1,061 | 4,474 | - | - | - | - | - | - | - | - | - | - |
| **Multifamily Developable Acres** | 104.62 | - | - | - | - | - | 0.32 | 37.28 | 17.09 | 6.07 | 43.86 | - | - | - | - |
| Assumed Multifamily Density (units/acre) | | | | | | | 8 | 12 | 16 | 24 | 12 | | | | |
| Subtotal Multifamily Unit Capacity | 1,395 | - | - | - | - | - | 3 | 447 | 273 | 146 | 526 | - | - | - | - |
| Existing Multifamily Units | 8 | - | - | - | - | - | - | 4 | - | - | - | - | 4 | - | - |
| Pending Multifamily Units | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Master Planned Multifamily Units | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Subtotal: Net Multifamily Unit Capacity | 1,391 | - | - | - | - | - | 3 | 443 | 273 | 146 | 526 | - | - | - | - |
| Potential Occupied Multifamily Units | 1,321 | - | - | - | - | - | 3 | 421 | 259 | 139 | 500 | - | - | - | - |
| Multifamily Population Capacity | 2,246 | - | - | - | - | - | 5 | 715 | 441 | 236 | 849 | - | - | - | - |
| Net Dwelling Unit Capacity | 3,595 | 243 | - | 376 | 1,585 | - | 3 | 443 | 273 | 146 | 526 | - | - | - | - |
| Potential Occupied Dwelling Units | 3,481 | 238 | - | 368 | 1,553 | - | 3 | 421 | 259 | 139 | 500 | - | - | - | - |
| **Population Capacity** | **8,467** | 686 | - | 1,061 | 4,474 | - | 5 | 715 | 441 | 236 | 849 | - | - | - | - |
| Remaining Population Growth to Accommodate (2021-2036) | 3,900 | | | | | | | | | | | | | | |
| **Population Capacity Surplus (Deficit)** | **4,567** | | | | | | | | | | | | | | |

*Sources: City of Lynden, 2022; Community Attributes Inc., 2021.*

**Exhibit 56. Nonresidential Development, Achieved and Assumed Densities, City of Lynden, 2016-2021**

| Zoning Designation | Development Type | Acres Developed | Built Square Feet | Achieved Density (FAR) | Assumed Density (FAR) |
|---|---|---|---|---|---|
| RS-72 | Commercial | 30.6 | 113,444 | 0.09 | N/A |
| CSR | Commercial | 3.0 | 31,976 | 0.25 | 0.18 |
| CSL | Commercial | 2.3 | 36,744 | 0.36 | 0.18 |
| HBD | Commercial | N/A | N/A | N/A | 0.18 |
| ID | Industrial | 16.1 | 198,000 | 0.28 | 0.26 |
| IBZ | Commercial | 1.5 | 8,112 | 0.13 | N/A |
| | Industrial | 15.5 | 185,818 | 0.28 | 0.26 |
| PU | Industrial | 3.9 | 22,000 | 0.13 | N/A |

*Sources: City of Lynden, 2022; Community Attributes Inc., 2021.*
*Note: Assumed Density is the assumed density for evaluation of land suitable for development by zone. RS-72 development was a School.*

## Exhibit 57. Developable Nonresidential Land Supply, Lynden UGA, 2021-2036

| | UGA Total | RS-100 | RM-2 | RM-3 | RM-4 | CSR | CSL | HBD | ID | IBZ | PU |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Vacant Land** | | | | | | | | | | | |
| Gross Acres | 299.58 | 0.00 | 0.00 | 0.00 | 0.00 | 69.80 | 17.52 | 0.00 | 78.25 | 134.01 | 0.00 |
| Critical Areas | 16.67 | 0.00 | 0.00 | 0.00 | 0.00 | 7.93 | 5.32 | 0.00 | 3.10 | 0.32 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 14.15 | 0.00 | 0.00 | 0.00 | 0.00 | 3.09 | 0.61 | 0.00 | 3.76 | 6.68 | 0.00 |
| Infrastructure Deduction | 14.15 | 0.00 | 0.00 | 0.00 | 0.00 | 3.09 | 0.61 | 0.00 | 3.76 | 6.68 | 0.00 |
| Market Factor | 38.19 | 0.00 | 0.00 | 0.00 | 0.00 | 8.35 | 1.65 | 0.00 | 10.15 | 18.05 | 0.00 |
| **Net Acres** | **216.43** | **0.00** | **0.00** | **0.00** | **0.00** | **47.34** | **9.33** | **0.00** | **57.49** | **102.27** | **0.00** |
| **Partially-Used Land** | | | | | | | | | | | |
| Gross Acres | 82.26 | 0.00 | 0.00 | 0.00 | 0.00 | 39.30 | 3.66 | 0.00 | 31.50 | 7.80 | 0.00 |
| Critical Areas | 5.75 | 0.00 | 0.00 | 0.00 | 0.00 | 4.94 | 0.00 | 0.00 | 0.00 | 0.81 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 3.83 | 0.00 | 0.00 | 0.00 | 0.00 | 1.72 | 0.18 | 0.00 | 1.57 | 0.35 | 0.00 |
| Infrastructure Deduction | 3.83 | 0.00 | 0.00 | 0.00 | 0.00 | 1.72 | 0.18 | 0.00 | 1.57 | 0.35 | 0.00 |
| Market Factor | 17.21 | 0.00 | 0.00 | 0.00 | 0.00 | 7.73 | 0.82 | 0.00 | 7.09 | 1.57 | 0.00 |
| **Net Acres** | **51.64** | **0.00** | **0.00** | **0.00** | **0.00** | **23.19** | **2.47** | **0.00** | **21.26** | **4.72** | **0.00** |
| **Underutilized Land** | | | | | | | | | | | |
| Gross Acres | 186.70 | 0.00 | 0.00 | 0.00 | 0.00 | 82.57 | 26.22 | 0.00 | 62.72 | 15.19 | 0.00 |
| Critical Areas | 8.51 | 0.00 | 0.00 | 0.00 | 0.00 | 7.72 | 0.79 | 0.00 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 8.91 | 0.00 | 0.00 | 0.00 | 0.00 | 3.74 | 1.27 | 0.00 | 3.14 | 0.76 | 0.00 |
| Infrastructure Deduction | 8.91 | 0.00 | 0.00 | 0.00 | 0.00 | 3.74 | 1.27 | 0.00 | 3.14 | 0.76 | 0.00 |
| Market Factor | 40.09 | 0.00 | 0.00 | 0.00 | 0.00 | 16.84 | 5.72 | 0.00 | 14.11 | 3.42 | 0.00 |
| **Net Acres** | **120.28** | **0.00** | **0.00** | **0.00** | **0.00** | **50.52** | **17.17** | **0.00** | **42.33** | **10.25** | **0.00** |

*Sources: City of Lynden, 2022; Community Attributes Inc., 2021.*

## Exhibit 58. Developable Nonresidential Land Capacity, Lynden UGA, 2021-2036

| | UGA | RS-100 | RM-2 | RM-3 | RM-4 | CSR | CSL | HBD | ID | IBZ | PU |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Net Developable Employment Acres (Vacant, PU, UU)** | **388.35** | **0.00** | **0.00** | **0.00** | **0.00** | **121.05** | **28.97** | **0.00** | **121.09** | **117.24** | **0.00** |
| **Commercial Developable Acres** | 150.02 | - | - | - | - | 121.05 | 28.97 | - | - | - | - |
| Assumed Commercial Density (FAR) | | | | | | 0.2 | 0.2 | 0.2 | | | |
| Subtotal: Commercial Capacity (SF) | 1,202,435 | - | - | - | - | 970,220 | 232,215 | - | - | - | - |
| Existing Commercial Space (SF) | 16,054 | - | - | - | - | 5,281 | 1,266 | - | - | 9,507 | - |
| Pending Commercial Space (SF) | - | - | - | - | - | - | - | - | - | - | - |
| Master Planned Commercial Space (SF) | - | - | - | - | - | - | - | - | - | - | - |
| Subtotal: Net Commercial Capacity (SF) | 1,195,888 | - | - | - | - | 964,939 | 230,949 | - | - | - | - |
| Potential Occupied Commercial Space (SF) | 1,136,094 | - | - | - | - | 916,692 | 219,402 | - | - | - | - |
| Commercial Employment Capacity | 1,575 | - | - | - | - | 1,271 | 304 | - | - | - | - |
| **Industrial Developable Acres** | 238.33 | - | - | - | - | - | - | - | 121.09 | 117.24 | - |
| Assumed Industrial Density (FAR) | | | | | | | | | 0.3 | 0.3 | |
| Subtotal: Industrial Capacity (SF) | 2,699,209 | - | - | - | - | - | - | - | 1,371,372 | 1,327,837 | - |
| Existing Industrial Space (SF) | 62,752 | 14,128 | 5,568 | 6,888 | 6,080 | 1,200 | 18,540 | - | 10,348 | - | - |
| Pending Industrial Space (SF) | - | - | - | - | - | - | - | - | - | - | - |
| Master Planned Industrial Space (SF) | - | - | - | - | - | - | - | - | - | - | - |
| Subtotal: Net Industrial Capacity (SF) | 2,688,861 | - | - | - | - | - | - | - | 1,361,024 | 1,327,837 | - |
| Potential Occupied Industrial Space (SF) | 2,554,418 | - | - | - | - | - | - | - | 1,292,973 | 1,261,445 | - |
| Industrial Employment Capacity | 2,463 | - | - | - | - | - | - | - | 1,247 | 1,216 | - |
| Net Commercial & Industrial Capacity (SF) | 3,884,749 | - | - | - | - | 964,939 | 230,949 | - | 1,361,024 | 1,327,837 | - |
| Potential Occupied Commercial & Industrial | 3,690,512 | - | - | - | - | 916,692 | 219,402 | - | 1,292,973 | 1,261,445 | - |
| Employment Capacity | **4,038** | - | - | - | - | 1,271 | 304 | - | 1,247 | 1,216 | - |
| Remaining Employment Growth to Accommodate (2021-2036) | 1,254 | | | | | | | | | | |
| **Employment Capacity Surplus (Deficit)** | **2,784** | | | | | | | | | | |

*Sources: City of Lynden, 2022; Community Attributes Inc., 2021.*

## 9. Nooksack UGA

The Nooksack Urban Growth Area is projected to reach a total population and employment of 2,425 and 369 respectively by 2036. The UGA has projected growth allocation of 861 for population and 100 for employment between 2016 and 2036 (**Exhibit 1** and **Exhibit 2**).

### Achieved Growth 2016-2021

Based on permit data collected between 2016 and 2021 and occupancy and persons per household and square feet per employee assumptions, the Nooksack UGA grew by an estimated 174 population and 8 employment (100% within the City) (**Exhibit 6** and **Exhibit 7**).

Between 2016 and 2021, the City of Nooksack achieved an overall residential density of 5.1 units per acre. No development occurred within the unincorporated area of the UGA within the period. The *City of Nooksack Comprehensive Plan* has an adopted planned residential density of 4.4 units per acre. The *Whatcom County Comprehensive Plan* has adopted planned residential density of 4.0 to 6.0 units per acre. Achieved residential density within the City of Nooksack exceeded the minimum planned density (**Exhibit 11**).

The City Comprehensive Plan references planned densities for commercial and industrial developed based on the *Whatcom County Land Capacity Analysis*. Whatcom County has not adopted planned densities for commercial or industrial uses. The City achieved a commercial FAR of 0.14, below the planned density of 0.25. The adopted planned industrial FAR is 0.10. No industrial development occurred within the City during the review period (**Exhibit 11**).

### Population and Employment Assumptions

Specific occupancy rate and population and employment density assumptions for estimating future growth capacity in the Nooksack UGA are:

- 96.9% Single Family occupancy rate
- 94.5% Multifamily occupancy rate
- 95.0% Commercial and Industrial occupancy rate
- 3.088 Single Family persons per household
- 3.173 Multifamily persons per household
- 605 and 795 respectively Commercial and Industrial square feet per employee

The Nooksack UGA has an estimated 687 population and 92 employment growth

remaining to accommodate between 2021 and 2036 (**Exhibit 6** and **Exhibit 7**).

## Population Capacity 2021-2036

The City of Nooksack is utilizing achieved densities (when available) when estimating future residential land capacity. Based on achieved densities between 2016 and 2021 and planning assumptions, City of Nooksack planners are assuming future single family density between 3.9 and 5.9 units per acre for single family residential development. The Nooksack UGA does not include any multifamily zones (**Exhibit 59**).

The Nooksack UGA has estimated net land capacity for population growth of 89.8 acres (**Exhibit 60**), with a total estimated potential occupied unit capacity of 416 dwelling units. Based on persons per household assumptions, the UGA has an estimated population capacity of 1,283, indicating an estimated population capacity surplus of 596 (**Exhibit 61**).

## Housing Needs by Type

The *Whatcom County Comprehensive Plan* (Chapter 3- Housing, Chart 3 – Estimated Dwelling Units Needed, page 3-8) indicates that Nooksack has a need for 243 single-family, 48 multi-family, and 49 other ("group housing") new dwelling units during the 2013-2036 planning period. The calculation for Chart 3 in the *Whatcom County Comprehensive Plan* included building activity from 2013. Therefore, the analysis below includes permit data from April 1, 2013, even though the planning period for this Buildable Lands Report is from 2016.

- Between April 1, 2013 and March 31, 2021, Nooksack issued building permits for 48 single-family and 10 multi-family units. No group housing has been built during this time. Comparing units built and the needs indicated on Chart 3, Nooksack needs an additional 195 single-family units, 38 multi-family units, and 49 group housing units between 2021 and 2036.

- The City and unincorporated UGA have an estimated 2021-2036 capacity for 425 single-family and 4 multi-family housing units (**Exhibit 61).** The multi-family capacity includes group housing. Given that Nooksack does not have a designated multi-family zoning district and that multi-family development is allowed in the City's single-family zones, it is anticipated that some of the above single-family capacity will be utilized to accommodate multi-family and group housing needs.

These capacities are sufficient to accommodate the dwelling unit types needed in the planning

period as established in the Whatcom County Comprehensive Plan (Chapter 3- Housing, Chart 3).

## Employment Capacity 2021-2036

Based on achieved densities between 2016 and 2021 and planning assumptions, City of Nooksack planners are assuming a future commercial FAR of 0.26 and an industrial FAR of 0.10 (**Exhibit 62**).

The Nooksack UGA has estimated net land capacity for employment growth of 38.5 acres (**Exhibit 63**), with a total estimated potential occupied commercial and industrial capacity of 238,772 square feet. Based on square feet per employee assumptions, the Nooksack UGA has an estimated employment capacity of 355, indicating an estimated employment capacity surplus of 263 (**Exhibit 64**).

## Regulatory Changes

The City of Nooksack has not identified any regulatory changes that would prevent assigned densities from being achieved or impact the quantity of land suitable for development during the remainder of the planning period.

## Infrastructure Gaps

The City of Nooksack has not identified any infrastructure gaps that would prevent assigned densities from being achieved or impact the quantity of land suitable for development during the remainder of the planning period (2021 to 2036).

## Analysis of Comprehensive Plan Objectives and Reasonable Measures

The City of Nooksack has determined that growth targets and assumptions are being met to a reasonable degree; therefore, an analysis of comprehensive plan development targets, assumptions and objectives is not deemed necessary.

Based on the results presented in the Buildable Land Report, implementation of reasonable measures is not deemed necessary. If in the future it is determined that Reasonable Measures are appropriate, then the following measures could be considered for implementation:

- Increase residential densities by reducing minimum lot sizes in the Residential District above the increases likely to result from establishment of the Residential-8600 Subzone.

- Reduce limitations on the placement of multifamily structures in the Residential District.

- Establish a multifamily residential zoning district.

- Increase opportunities for construction of accessory dwelling units (ADUs).

## Residential Development

**Exhibit 59. Residential Development, Achieved and Assumed Densities, City of Nooksack, 2016-2021**

| Zoning Designation | Development Type | Acres Developed | Dwelling Units | Achieved Density (Units/Acre) | Density Assumed (Units/Acre) |
|---|---|---|---|---|---|
| RES | Single Family | 5.6 | 22 | 3.93 | 3.93 |
| | Multifamily | 1.3 | 10 | 7.97 | N/A |
| RES-8600 | Single Family | 4.4 | 26 | 5.88 | 5.88 |
| AG UR | Single Family | N/A | N/A | N/A | 4.80 |

*Sources: City of Nooksack, 2022; Community Attributes Inc., 2021.*
*Note: "Density Assumed" is the assumed density for evaluation of land suitable for development by zone.*

## Exhibit 60. Residential Land Supply, Nooksack UGA, 2021-2036

| | UGA Total | RES | RES-8600 | COM | CMD | LI | AG UR |
|---|---|---|---|---|---|---|---|
| **Vacant Land** | | | | | | | |
| Gross Acres | 83.36 | 43.41 | 9.66 | 0.00 | 0.00 | 0.00 | 30.29 |
| Critical Areas | 28.68 | 16.68 | 3.30 | 0.00 | 0.00 | 0.00 | 8.69 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 2.73 | 1.34 | 0.32 | 0.00 | 0.00 | 0.00 | 1.08 |
| Infrastructure Deduction | 2.73 | 1.34 | 0.32 | 0.00 | 0.00 | 0.00 | 1.08 |
| Market Factor | 7.38 | 3.61 | 0.86 | 0.00 | 0.00 | 0.00 | 2.92 |
| **Net Acres** | **41.83** | **20.44** | **4.87** | **0.00** | **0.00** | **0.00** | **16.52** |
| **Partially-Used Land** | | | | | | | |
| Gross Acres | 87.19 | 86.08 | 1.10 | 0.00 | 0.00 | 0.00 | 0.00 |
| Critical Areas | 16.08 | 16.08 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 3.56 | 3.50 | 0.06 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Deduction | 3.56 | 3.50 | 0.06 | 0.00 | 0.00 | 0.00 | 0.00 |
| Market Factor | 16.00 | 15.75 | 0.25 | 0.00 | 0.00 | 0.00 | 0.00 |
| **Net Acres** | **48.00** | **47.25** | **0.74** | **0.00** | **0.00** | **0.00** | **0.00** |
| **Underutilized Land** | | | | | | | |
| Gross Acres | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Critical Areas | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Deduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Market Factor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| **Net Acres** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

*Sources: City of Nooksack, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

## Exhibit 61. Developable Residential Land Capacity, Nooksack UGA, 2021-2036

| | UGA | RES | RES-8600 | COM | CMD | LI | AG UR |
|---|---|---|---|---|---|---|---|
| **Net Developable Residential Acres (Vacant, PU, UU)** | **89.83** | **67.70** | **5.61** | **0.00** | **0.00** | **0.00** | **16.52** |
| **Single Family Developable Acres** | 89.83 | 67.70 | 5.61 | - | - | - | 16.52 |
| Assumed Single Family Density (units/acre) | | 4 | 6 | | | | 5 |
| Subtotal Single Family Unit Capacity | 378 | 266 | 33 | - | - | - | 79 |
| Existing Single Family Units | 33 | 21 | 1 | 8 | 2 | 1 | - |
| Pending Single Family Units | 69 | 8 | 61 | - | - | - | - |
| Master Planned Single Family Units | - | - | - | - | - | - | - |
| Subtotal: Net Single Family Unit Capacity | 425 | 253 | 93 | - | - | - | 79 |
| Potential Occupied Single Family Units | 412 | 245 | 90 | - | - | - | 77 |
| Single Family Population Capacity | 1,271 | 757 | 278 | - | - | - | 236 |
| **Multifamily Developable Acres** | - | - | - | - | - | - | - |
| Assumed Multifamily Density (units/acre) | | | | | | | |
| Subtotal Multifamily Unit Capacity | - | - | - | - | - | - | - |
| Existing Multifamily Units | - | - | - | - | - | - | - |
| Pending Multifamily Units | 4 | - | 4 | - | - | - | - |
| Master Planned Multifamily Units | - | - | - | - | - | - | - |
| Subtotal: Net Multifamily Unit Capacity | 4 | - | 4 | - | - | - | - |
| Potential Occupied Multifamily Units | 4 | - | 4 | - | - | - | - |
| Multifamily Population Capacity | 12 | - | 12 | - | - | - | - |
| Net Dwelling Unit Capacity | 429 | 253 | 97 | - | - | - | 79 |
| Potential Occupied Dwelling Units | 416 | 245 | 94 | - | - | - | 77 |
| **Population Capacity** | **1,283** | 757 | 290 | - | - | - | 236 |
| Remaining Population Growth to Accommodate (2021-2036) | 687 | | | | | | |
| **Population Capacity Surplus (Deficit)** | **596** | | | | | | |

*Sources: City of Nooksack, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

**Exhibit 62. Nonresidential Development, Achieved and Assumed Densities, City of Nooksack, 2016-2021**

| Zoning Designation | Development Type | Acres Developed | Built Square Feet | Achieved Density (FAR) | Assumed Density (FAR) |
|---|---|---|---|---|---|
| COM | Commercial | 0.6 | 3,765 | 0.14 | 0.25 |
| CMD | Commercial | 0.2 | 1,160 | 0.15 | 0.25 |
| LI | Industrial | N/A | N/A | N/A | 0.10 |

*Sources: City of Nooksack, 2022; Community Attributes Inc., 2021.*
*Note: Assumed Density is the assumed density for evaluation of land suitable for development by zone.*

## Exhibit 63. Developable Nonresidential Land Supply, Nooksack UGA, 2021-2036

| | UGA Total | RES | RES-8600 | COM | CMD | LI | AG UR |
|---|---|---|---|---|---|---|---|
| **Vacant Land** | | | | | | | |
| Gross Acres | 19.96 | 0.00 | 0.00 | 2.10 | 0.17 | 17.70 | 0.00 |
| Critical Areas | 0.74 | 0.00 | 0.00 | 0.74 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 0.96 | 0.00 | 0.00 | 0.07 | 0.01 | 0.89 | 0.00 |
| Infrastructure Deduction | 0.96 | 0.00 | 0.00 | 0.07 | 0.01 | 0.89 | 0.00 |
| Market Factor | 2.60 | 0.00 | 0.00 | 0.18 | 0.02 | 2.39 | 0.00 |
| **Net Acres** | **14.71** | **0.00** | **0.00** | **1.04** | **0.13** | **13.54** | **0.00** |
| **Partially-Used Land** | | | | | | | |
| Gross Acres | 0.45 | 0.00 | 0.00 | 0.45 | 0.00 | 0.00 | 0.00 |
| Critical Areas | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 0.02 | 0.00 | 0.00 | 0.02 | 0.00 | 0.00 | 0.00 |
| Infrastructure Deduction | 0.02 | 0.00 | 0.00 | 0.02 | 0.00 | 0.00 | 0.00 |
| Market Factor | 0.10 | 0.00 | 0.00 | 0.10 | 0.00 | 0.00 | 0.00 |
| **Net Acres** | **0.30** | **0.00** | **0.00** | **0.30** | **0.00** | **0.00** | **0.00** |
| **Underutilized Land** | | | | | | | |
| Gross Acres | 38.53 | 0.00 | 0.00 | 21.10 | 0.59 | 16.83 | 0.00 |
| Critical Areas | 3.73 | 0.00 | 0.00 | 3.73 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 1.74 | 0.00 | 0.00 | 0.87 | 0.03 | 0.84 | 0.00 |
| Infrastructure Deduction | 1.74 | 0.00 | 0.00 | 0.87 | 0.03 | 0.84 | 0.00 |
| Market Factor | 7.83 | 0.00 | 0.00 | 3.91 | 0.13 | 3.79 | 0.00 |
| **Net Acres** | **23.49** | **0.00** | **0.00** | **11.72** | **0.40** | **11.36** | **0.00** |

*Sources: City of Nooksack, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

## Exhibit 64. Developable Nonresidential Land Capacity, Nooksack UGA, 2021-2036

| | UGA | RES | RES-8600 | COM | CMD | LI | AG UR |
|---|---|---|---|---|---|---|---|
| **Net Developable Employment Acres (Vacant, PU, UU)** | **38.50** | **0.00** | **0.00** | **13.07** | **0.53** | **24.90** | **0.00** |
| **Commercial Developable Acres** | 13.59 | - | - | 13.07 | 0.53 | - | - |
| Assumed Commercial Density (FAR) | | | | 0.3 | 0.3 | | |
| Subtotal: Commercial Capacity (SF) | 148,035 | - | - | 142,288 | 5,747 | - | - |
| Existing Commercial Space (SF) | - | - | - | - | - | - | - |
| Pending Commercial Space (SF) | - | - | - | - | - | - | - |
| Master Planned Commercial Space (SF) | - | - | - | - | - | - | - |
| Subtotal: Net Commercial Capacity (SF) | 148,035 | - | - | 142,288 | 5,747 | - | - |
| Potential Occupied Commercial Space (SF) | 140,633 | - | - | 135,174 | 5,460 | - | - |
| Commercial Employment Capacity | 232 | - | - | 223 | 9 | - | - |
| **Industrial Developable Acres** | 24.90 | - | - | - | - | 24.90 | - |
| Assumed Industrial Density (FAR) | | | | | | 0.1 | |
| Subtotal: Industrial Capacity (SF) | 108,486 | - | - | - | - | 108,486 | - |
| Existing Industrial Space (SF) | 8,622 | - | - | 3,440 | - | 5,182 | - |
| Pending Industrial Space (SF) | - | - | - | - | - | - | - |
| Master Planned Industrial Space (SF) | - | - | - | - | - | - | - |
| Subtotal: Net Industrial Capacity (SF) | 103,304 | - | - | - | - | 103,304 | - |
| Potential Occupied Industrial Space (SF) | 98,139 | - | - | - | - | 98,139 | - |
| Industrial Employment Capacity | 123 | - | - | - | - | 123 | - |
| Net Commercial & Industrial Capacity (SF) | 251,339 | - | - | 142,288 | 5,747 | 103,304 | - |
| Potential Occupied Commercial & Industrial | 238,772 | - | - | 135,174 | 5,460 | 98,139 | - |
| Employment Capacity | **355** | - | - | 223 | 9 | 123 | - |
| Remaining Employment Growth to Accommodate (2021-2036) | 92 | | | | | | |
| **Employment Capacity Surplus (Deficit)** | **263** | | | | | | |

*Sources: City of Nooksack, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

## 10. Sumas UGA

The Sumas Urban Growth Area is projected to reach a total population and employment of 2,323 and 1,145 respectively by 2036. The UGA has projected growth allocation of 760 for population and 387 for employment between 2016 and 2036 (**Exhibit 1** and **Exhibit 2**).

**Achieved Growth 2016-2021**

Based on permit data collected between 2016 and 2021 and occupancy and persons per household and square feet per employee assumptions, the Sumas UGA grew by an estimated 190 population and 65 employment (100% within the City) (**Exhibit 6** and **Exhibit 7**).

Between 2016 and 2021, the City of Sumas achieved an overall residential density of 7.5 units per acre. No development occurred within the unincorporated area of the UGA within the period. The *City of Sumas Comprehensive Plan* has an adopted planned residential density of 4.9 units per acre. The *Whatcom County Comprehensive Plan* has adopted planned residential density of 4.0 to 6.0 units per acre. Achieved residential density within the City of Sumas exceeded both the City and County planned densities (**Exhibit 11**).

The City Comprehensive Plan references planned densities for commercial and industrial developed based on the *Whatcom County Land Capacity Analysis*. Whatcom County has not adopted planned densities for commercial or industrial uses. No commercial development occurred within the City during the review period. The City achieved an industrial FAR of 0.12, exceeding slightly the planned density of 0.11. The adopted planned commercial FAR is 0.22 (**Exhibit 11**).

**Population and Employment Assumptions**

Specific occupancy rate and population and employment density assumptions for estimating future growth capacity in the Sumas UGA are:

- 95.8% Single Family occupancy rate
- 82.2% Multifamily occupancy rate
- 95.0% Commercial and Industrial occupancy rate
- 3.008 Single Family persons per household
- 2.199 Multifamily persons per household
- 669 and 890 respectively Commercial and Industrial square feet per employee

The Sumas UGA has an estimated 570 population and 322 employment growth

remaining to accommodate between 2021 and 2036 (**Exhibit 6** and **Exhibit 7**).

## Population Capacity 2021-2036

Based on achieved densities between 2016 and 2021 and planning assumptions, City of Sumas planners are assuming future single family density between 2.5 and 4.5 units per acre for single family residential development. Assumed density for future multifamily development is 13.5 units per acre (**Exhibit 65**).

The Sumas UGA has estimated net land capacity for population growth of 65.8 acres (**Exhibit 66**), with a total estimated potential occupied unit capacity of 435 dwelling units. Based on persons per household assumptions, the UGA has an estimated population capacity of 1,073, indicating an estimated population capacity surplus of 503 (**Exhibit 67**).

## Housing Needs by Type

The *Whatcom County Comprehensive Plan* (Chapter 3- Housing, Chart 3 – Estimated Dwelling Units Needed, page 3-8) indicates that Sumas has a need for 168 single-family, 146 multi-family, and 47 other ("group housing") new dwelling units during the 2013-2036 planning period. The calculation for Chart 3 in the *Whatcom County Comprehensive Plan* included building activity from 2013. Therefore, the analysis below includes permit data from April 1, 2013, even though the planning period for this Buildable Lands Report is from 2016.

- Between April 1, 2013 and March 31, 2021, Sumas issued building permits for 57 single-family and 45 multi-family units. No group housing has been built during this time. Comparing units built and the needs indicated on Chart 3, Sumas needs an additional 111 single-family units, 101 multi-family units, and 47 group housing units between 2021 and 2036.

- The City and unincorporated UGA have an estimated 2021-2036 capacity for 151 single-family and 353 multi-family housing units (**Exhibit 67).** The multi-family capacity includes group housing.

These capacities are sufficient to accommodate the dwelling unit types needed in the planning period as established in the Whatcom County Comprehensive Plan (Chapter 3- Housing, Chart 3).

## Employment Capacity 2021-2036

The City of Sumas is utilizing achieved densities (when available) when estimating future land capacity. Based on achieved

densities between 2016 and 2021 and planning assumptions, City of Sumas planners are assuming a future commercial FAR between 0.22 and 0.50 depending on the specific zone and an industrial FAR of 0.12 (**Exhibit 68**).

The Sumas UGA has estimated net land capacity for employment growth of 110.6 acres (**Exhibit 69**), with a total estimated potential occupied commercial and industrial capacity of 601,950 square feet. Based on square feet per employee assumptions, the Sumas UGA has an estimated employment capacity of 758, indicating an estimated employment capacity surplus of 436 (**Exhibit 70**).

## Regulatory Changes

The City of Sumas has not identified any regulatory changes that would prevent assigned densities from being achieved or impact the quantity of land suitable for development during the remainder of the planning period.

## Infrastructure Gaps

The City of Sumas has not identified any infrastructure gaps that would prevent assigned densities from being achieved or impact the quantity of land suitable for development during the remainder of the planning period (2021 to 2036).

## Analysis of Comprehensive Plan Objectives and Reasonable Measures

The City of Sumas has determined that growth targets and assumptions are being met to a reasonable degree; therefore, an analysis of comprehensive plan development targets, assumptions and objectives is not deemed necessary.

Based on the results presented in the Buildable Land Report, implementation of reasonable measures is not deemed necessary. If in the future it is determined that Reasonable Measures are appropriate, then the following measures could be considered for implementation:

- Increase residential densities by reducing minimum lot sizes in the Residential, Low-Density zoning district.

- Reduce conditional use permitting requirements for construction of multifamily structures in the Residential, High-Density zoning district.

- Increase opportunities for construction of accessory dwelling units (ADUs).

**Exhibit 65. Residential Development, Achieved and Assumed Densities, City of Sumas, 2016-2021**

| Zoning Designation | Development Type | Acres Developed | Dwelling Units | Achieved Density (Units/Acre) | Density Assumed (Units/Acre) |
|---|---|---|---|---|---|
| RES LOW | Single Family | 0.8 | 2 | 2.44 | 2.50 |
| RES MED | Single Family | 5.5 | 27 | 4.91 | 4.50 |
| RES HIGH | Single Family | 2.5 | 12 | 4.77 | N/A |
| | Multifamily | 1.8 | 36 | 19.54 | 13.50 |
| BUS GEN | Multifamily | 0.1 | 4 | 44.44 | N/A |

*Sources: City of Sumas, 2022; Community Attributes Inc., 2021.*
*Note: "Density Assumed" is the assumed density for evaluation of land suitable for development by zone.*

## Exhibit 66. Residential Land Supply, Sumas UGA, 2021-2036

| | UGA Total | RES LOW | RES MED | RES HIGH | BUS GEN | LI | BUS TO | BUS LOW |
|---|---|---|---|---|---|---|---|---|
| **Vacant Land** | | | | | | | | |
| Gross Acres | 69.68 | 4.36 | 24.36 | 40.95 | 0.00 | 0.00 | 0.00 | 0.00 |
| Critical Areas | 27.26 | 2.80 | 3.96 | 20.50 | 0.00 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 2.12 | 0.08 | 1.02 | 1.02 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Deduction | 2.12 | 0.08 | 1.02 | 1.02 | 0.00 | 0.00 | 0.00 | 0.00 |
| Market Factor | 5.73 | 0.21 | 2.75 | 2.76 | 0.00 | 0.00 | 0.00 | 0.00 |
| **Net Acres** | **32.45** | **1.19** | **15.61** | **15.65** | **0.00** | **0.00** | **0.00** | **0.00** |
| **Partially-Used Land** | | | | | | | | |
| Gross Acres | 84.72 | 38.38 | 25.39 | 20.94 | 0.00 | 0.00 | 0.00 | 0.00 |
| Critical Areas | 35.27 | 16.40 | 13.52 | 5.35 | 0.00 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 2.47 | 1.10 | 0.59 | 0.78 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Deduction | 2.47 | 1.10 | 0.59 | 0.78 | 0.00 | 0.00 | 0.00 | 0.00 |
| Market Factor | 11.13 | 4.95 | 2.67 | 3.51 | 0.00 | 0.00 | 0.00 | 0.00 |
| **Net Acres** | **33.38** | **14.84** | **8.01** | **10.52** | **0.00** | **0.00** | **0.00** | **0.00** |
| **Underutilized Land** | | | | | | | | |
| Gross Acres | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Critical Areas | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Deduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Market Factor | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| **Net Acres** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

*Sources: City of Sumas, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

## Exhibit 67. Developable Residential Land Capacity, Sumas UGA, 2021-2036

| | UGA | RES LOW | RES MED | RES HIGH | BUS GEN | LI | BUS TO | BUS LOW |
|---|---|---|---|---|---|---|---|---|
| **Net Developable Residential Acres (Vacant, PU, UU)** | **65.83** | **16.03** | **23.63** | **26.17** | **0.00** | **0.00** | **0.00** | **0.00** |
| **Single Family Developable Acres** | 39.66 | 16.03 | 23.63 | - | - | - | - | - |
| Assumed Single Family Density (units/acre) | | 3 | 5 | | | | | |
| Subtotal Single Family Unit Capacity | 146 | 40 | 106 | - | - | - | - | - |
| Existing Single Family Units | 38 | 6 | 7 | 9 | 13 | 2 | - | 1 |
| Pending Single Family Units | 18 | - | 18 | - | - | - | - | - |
| Master Planned Single Family Units | - | - | - | - | - | - | - | - |
| Subtotal: Net Single Family Unit Capacity | 151 | 34 | 117 | - | - | - | - | - |
| Potential Occupied Single Family Units | 145 | 33 | 112 | - | - | - | - | - |
| Single Family Population Capacity | 435 | 98 | 337 | - | - | - | - | - |
| **Multifamily Developable Acres** | 26.17 | - | - | 26.17 | - | - | - | - |
| Assumed Multifamily Density (units/acre) | | | | 14 | | | | |
| Subtotal Multifamily Unit Capacity | 353 | - | - | 353 | - | - | - | - |
| Existing Multifamily Units | 4 | - | - | - | 4 | - | - | - |
| Pending Multifamily Units | - | - | - | - | - | - | - | - |
| Master Planned Multifamily Units | - | - | - | - | - | - | - | - |
| Subtotal: Net Multifamily Unit Capacity | 353 | - | - | 353 | - | - | - | - |
| Potential Occupied Multifamily Units | 290 | - | - | 290 | - | - | - | - |
| Multifamily Population Capacity | 638 | - | - | 638 | - | - | - | - |
| Net Dwelling Unit Capacity | 504 | 34 | 117 | 353 | - | - | - | - |
| Potential Occupied Dwelling Units | 435 | 33 | 112 | 290 | - | - | - | - |
| **Population Capacity** | **1,073** | 98 | 337 | 638 | - | - | - | - |
| Remaining Population Growth to Accommodate (2021-2036) | 570 | | | | | | | |
| **Population Capacity Surplus (Deficit)** | **503** | | | | | | | |

*Sources: City of Sumas, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

**Exhibit 68. Nonresidential Development, Achieved and Assumed Densities, City of Sumas, 2016-2021**

| Zoning Designation | Development Type | Acres Developed | Built Square Feet | Achieved Density (FAR) | Assumed Density (FAR) |
|---|---|---|---|---|---|
| RES LOW | Commercial | N/A | N/A | N/A | 0.50 |
| RES MED | Commercial | N/A | N/A | N/A | 0.44 |
| RES HIGH | Commercial | N/A | N/A | N/A | 0.25 |
| BUS GEN | Commercial | N/A | N/A | N/A | 0.22 |
| BUS TO | Commercial | N/A | N/A | N/A | 0.22 |
| BUS LOW | Commercial | N/A | N/A | N/A | 0.22 |
| LI | Industrial | 11.2 | 60,549 | 0.12 | 0.12 |

*Sources: City of Sumas, 2022; Community Attributes Inc., 2021.*
*Note: Assumed Density is the assumed density for evaluation of land suitable for development by zone.*

## Exhibit 69. Developable Nonresidential Land Supply, Sumas UGA, 2021-2036

| | UGA Total | RES LOW | RES MED | RES HIGH | BUS GEN | LI | BUS TO | BUS LOW |
|---|---|---|---|---|---|---|---|---|
| **Vacant Land** | | | | | | | | |
| Gross Acres | 206.54 | 0.00 | 0.00 | 0.00 | 5.15 | 168.29 | 32.89 | 0.21 |
| Critical Areas | 97.92 | 0.00 | 0.00 | 0.00 | 2.19 | 88.44 | 7.08 | 0.21 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 5.43 | 0.00 | 0.00 | 0.00 | 0.15 | 3.99 | 1.29 | 0.00 |
| Infrastructure Deduction | 5.43 | 0.00 | 0.00 | 0.00 | 0.15 | 3.99 | 1.29 | 0.00 |
| Market Factor | 14.66 | 0.00 | 0.00 | 0.00 | 0.40 | 10.78 | 3.48 | 0.00 |
| **Net Acres** | **83.09** | **0.00** | **0.00** | **0.00** | **2.26** | **61.08** | **19.75** | **0.00** |
| **Partially-Used Land** | | | | | | | | |
| Gross Acres | 13.87 | 0.00 | 0.00 | 0.00 | 0.00 | 13.87 | 0.00 | 0.00 |
| Critical Areas | 6.35 | 0.00 | 0.00 | 0.00 | 0.00 | 6.35 | 0.00 | 0.00 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 0.38 | 0.00 | 0.00 | 0.00 | 0.00 | 0.38 | 0.00 | 0.00 |
| Infrastructure Deduction | 0.38 | 0.00 | 0.00 | 0.00 | 0.00 | 0.38 | 0.00 | 0.00 |
| Market Factor | 1.69 | 0.00 | 0.00 | 0.00 | 0.00 | 1.69 | 0.00 | 0.00 |
| **Net Acres** | **5.08** | **0.00** | **0.00** | **0.00** | **0.00** | **5.08** | **0.00** | **0.00** |
| **Underutilized Land** | | | | | | | | |
| Gross Acres | 50.02 | 0.00 | 0.00 | 0.00 | 4.11 | 45.62 | 0.00 | 0.29 |
| Critical Areas | 16.81 | 0.00 | 0.00 | 0.00 | 0.98 | 15.54 | 0.00 | 0.29 |
| Future Public Uses | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Infrastructure Gaps | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Quasi-Public Use Deduction | 1.66 | 0.00 | 0.00 | 0.00 | 0.16 | 1.50 | 0.00 | 0.00 |
| Infrastructure Deduction | 1.66 | 0.00 | 0.00 | 0.00 | 0.16 | 1.50 | 0.00 | 0.00 |
| Market Factor | 7.47 | 0.00 | 0.00 | 0.00 | 0.70 | 6.77 | 0.00 | 0.00 |
| **Net Acres** | **22.42** | **0.00** | **0.00** | **0.00** | **2.11** | **20.31** | **0.00** | **0.00** |

*Sources: City of Sumas, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

## Exhibit 70. Developable Nonresidential Land Capacity, Sumas UGA, 2021-2036

| | UGA | RES LOW | RES MED | RES HIGH | BUS GEN | LI | BUS TO | BUS LOW |
|---|---|---|---|---|---|---|---|---|
| **Net Developable Employment Acres (Vacant, PU, UU)** | **110.59** | **0.00** | **0.00** | **0.00** | **4.37** | **86.47** | **19.75** | **0.00** |
| **Commercial Developable Acres** | 24.12 | - | - | - | 4.37 | - | 19.75 | 0.00 |
| Assumed Commercial Density (FAR) | | 0.5 | 0.4 | 0.3 | 0.2 | | 0.2 | 0.2 |
| Subtotal: Commercial Capacity (SF) | 231,113 | - | - | - | 41,882 | - | 189,231 | - |
| Existing Commercial Space (SF) | - | - | - | - | - | - | - | - |
| Pending Commercial Space (SF) | - | - | - | - | - | - | - | - |
| Master Planned Commercial Space (SF) | - | - | - | - | - | - | - | - |
| Subtotal: Net Commercial Capacity (SF) | 231,113 | - | - | - | 41,882 | - | 189,231 | - |
| Potential Occupied Commercial Space (SF) | 219,557 | - | - | - | 39,788 | - | 179,769 | - |
| Commercial Employment Capacity | 328 | - | - | - | 59 | - | 269 | - |
| **Industrial Developable Acres** | 86.47 | - | - | - | - | 86.47 | - | - |
| Assumed Industrial Density (FAR) | | | | | | 0.1 | | |
| Subtotal: Industrial Capacity (SF) | 451,991 | - | - | - | - | 451,991 | - | - |
| Existing Industrial Space (SF) | 49,472 | - | - | - | - | 49,472 | - | - |
| Pending Industrial Space (SF) | - | - | - | - | - | - | - | - |
| Master Planned Industrial Space (SF) | - | - | - | - | - | - | - | - |
| Subtotal: Net Industrial Capacity (SF) | 402,519 | - | - | - | - | 402,519 | - | - |
| Potential Occupied Industrial Space (SF) | 382,393 | - | - | - | - | 382,393 | - | - |
| Industrial Employment Capacity | 430 | - | - | - | - | 430 | - | - |
| Net Commercial & Industrial Capacity (SF) | 633,632 | - | - | - | 41,882 | 402,519 | 189,231 | - |
| Potential Occupied Commercial & Industrial | 601,950 | - | - | - | 39,788 | 382,393 | 179,769 | - |
| Employment Capacity | **758** | - | - | - | 59 | 430 | 269 | - |
| Remaining Employment Growth to Accommodate (2021-2036) | 322 | | | | | | | |
| **Employment Capacity Surplus (Deficit)** | **436** | | | | | | | |

*Sources: City of Sumas, 2022; Whatcom County, 2021; Community Attributes Inc., 2021.*

# Appendix A: Annexations

Between 2016 and 2021, 445 total acres were annexed to cities in Whatcom County. These annexations increased the total incorporated area in Whatcom County to 35,385 acres (**Exhibit 71**). These annexations were adopted by the following city legislative actions:

- City of Bellingham Ordinances 2018-11-027 and 2018-12-033
- City of Lynden Ordinances 1506, 1509, and 1561
- City of Nooksack Ordinance 712

**Exhibit 71. Whatcom County Acres Annexed by City, 2016-2021**

| | Acres 2016 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | Total Acres Annexed | Acres 2021 |
|---|---|---|---|---|---|---|---|---|---|
| Bellingham | 19,275 | 0 | 0 | 0 | 249 | 0 | 0 | 249 | 19,524 |
| Blaine | 5,464 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 5,464 |
| Everson | 877 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 877 |
| Ferndale | 4,561 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 4,561 |
| Lynden | 3,382 | 82 | 0 | 10 | 0 | 0 | 0 | 92 | 3,474 |
| Nooksack | 446 | 0 | 0 | 0 | 104 | 0 | 0 | 104 | 550 |
| Sumas | 935 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 935 |
| **Total** | **34,940** | **82** | **0** | **10** | **353** | **0** | **0** | **445** | **35,385** |

*Sources: Whatcom County and Cities, 2022 (Countywide Data Reporting Tool).*
*Notes: Acres 2016 represents acres within city limits as of March 31, 2016. Acres 2021 represents acres within city limits as of March 31, 2021. Numbers have been rounded. For Bellingham, land area excluding Bellingham Bay, Lake Whatcom, and Lake Padden is equal to 18,046 acres.*

# Appendix B: Urban Growth Area Changes

Between 2016 and 2021, 345 acres were added to Whatcom County's urban growth areas. UGAs include areas within the city limits and unincorporated areas that have been designated for urban growth. UGA changes authorized by Whatcom County Ordinance 2016-034 include a reduction of 20 acres in the Everson UGA, as well as increases in the Ferndale, Lynden, and Nooksack UGAs. Overall, as of March 31, 2021, Whatcom County's UGAs total 52,029 acres (**Exhibit 72**).

**Exhibit 72. Whatcom County Acres Added to Urban Growth Areas, 2016-2021**

| | Acres 2016 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | Total Acres Added to UGAs | Acres 2021 |
|---|---|---|---|---|---|---|---|---|---|
| Bellingham | 23,172 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 23,172 |
| Birch Bay | 3,607 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3,607 |
| Blaine | 4,071 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 4,071 |
| Cherry Point | 7,035 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 7,035 |
| Columbia Valley | 1,157 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1,157 |
| Everson | 1,287 | (20) | 0 | 0 | 0 | 0 | 0 | (20) | 1,267 |
| Ferndale | 5,869 | 117 | 0 | 0 | 0 | 0 | 0 | 117 | 5,986 |
| Lynden | 3,979 | 193 | 0 | 0 | 0 | 0 | 0 | 193 | 4,172 |
| Nooksack | 548 | 55 | 0 | 0 | 0 | 0 | 0 | 55 | 603 |
| Sumas | 959 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 959 |
| **Total** | **51,684** | **345** | **0** | **0** | **0** | **0** | **0** | **345** | **52,029** |

*Sources: Whatcom County and Cities, 2022 (Countywide Data Reporting Tool).*
*Notes: Acres 2016 represents acres within each UGA as of March 31, 2016. Acres 2021 represents acres within each UGA as of March 31, 2021.*

# Appendix C: Zoning Map Changes

Zoning map changes documented in **Exhibit 73** and **Exhibit 74** provide a detailed accounting of changes to zoning within each UGA for residential, commercial, industrial, and other types of zones between 2016 and 2021. Many of the general land use categories encompass a number of zoning districts. In 2016, land was added to some UGAs or moved between UGAs. This land has not been rezoned and therefore these changes are reflected in **Exhibit 72**, but not in the zoning map changes.

Ordinances authorizing zoning changes from one land use category to another between April 1, 2016 and March 31, 2021:

- Bellingham UGA
  - City of Bellingham Ordinance 2017-07-018 rezoned 0.51 acres from Residential - Single Family to Commercial.
  - City of Bellingham Ordinance 2017-07-019 rezoned 10 acres from Residential – Single Family to Industrial.
  - City of Bellingham Ordinance 2017-07-020 rezoned 3.6 acres from Industrial to public and 17.7 acres of Commercial / Industrial / Residential Multifamily to Public.
  - City of Bellingham Ordinance 2017-11-025 rezoned 12.7 acres from Commercial to Institutional.

- Everson UGA
  - City of Everson zoning changes in 2016 were part of the 2016 Comprehensive Plan update, adopted through Ordinance 767-16.
  - City of Everson zoning changes in 2019 were adopted through Ordinance 806-19.

- Ferndale UGA
  - Ferndale Ordinance 1957 (2016) – Rezoned 0.75 acres from Residential – Single Family to Residential - Multifamily.
  - Ferndale Ordinance 1977 (2016) – Rezoned 6.78 acres from Residential – Single Family to Commercial.
  - Ferndale Ordinance 2080 (2019) – Rezoned 112 acres from Floodplain to Public (3.9 acres), Residential – Single Family (8.51 acres), Residential – Multifamily (48.62 acres), and Commercial (52.14 acres). Rezoned 18.92 acres from Commercial to Residential – Multifamily and 4.45 acres from Commercial to Residential – Single Family.
  - Ferndale Ordinance 2160 (2020) – Rezoned 2.71 acres from Residential – Single Family to Residential – Multifamily, and 3.8 acres from Residential – Multifamily to Commercial.

- Lynden UGA
    - Lynden Ordinances 1506 and 1509 (2016) - Annexed 82 acres and rezoned to Residential.
    - Lynden Ordinance1519 (2016) - Rezoned 7 acres from Commercial to Industrial, 1 acre from Residential to Commercial, and 5 acres from Residential to Public Use.
    - Lynden Ordinance 1548 (2017) - Rezoned 27 acres from Commercial to Residential.
    - Lynden Ordinance 1569 (2018) - Rezoned 16 acres from Residential to Commercial (6 acres), Industrial (8 acres), and Public Use (2 acres). This Ordinance also rezoned 9 acres from Commercial to Industrial.
    - Lynden Ordinance 1561 (2018) - Annexed 10 acres and rezoned to Residential.
    - Lynden Ordinance 1597 (2019) - Rezoned 1 acre from Single Family Residential to Multifamily Residential.
    - Lynden Ordinance 1619 (2020)- Rezoned 83 acres from Single Family Residential to Multifamily Residential (80 acres) and Public Use (3 acres) in the Pepin Creek Subarea.

- Nooksack UGA
    - City of Nooksack Ordinance 712 rezoned 31 acres of a 104 acre annexation area from Residential to Public zoning.

- Sumas UGA
    - City of Sumas Ordinance No. 1685 adopted zoning changes from the 2016 Comprehensive Plan update.

- Areas Outside UGAs
    - Whatcom County Ordinance 2016-036 rezoned 2 acres of Rural one dwelling per five acres to Rural-Industrial.

## Exhibit 73. Whatcom County Zoning Changes by Urban Growth Area and Land Use, Acres, 2016-2021

| UGA | City Zoning 2016 | County Zoning 2016 | Zoning 2016 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | Total Zoning Changes | Zoning 2021 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Bellingham** | | | | | | | | | | | |
| Residential - Single Family | 7,868 | 2,205 | 10,073 | 0 | (11) | 0 | 0 | 0 | 0 | (11) | 10,062 |
| Residential - Multifamily | 3,209 | 46 | 3,255 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3,255 |
| Commercial | 1,847 | 314 | 2,161 | 0 | (12) | 0 | 0 | 0 | 0 | (12) | 2,149 |
| Industrial | 2,434 | 2,486 | 4,919 | 0 | 6 | 0 | 0 | 0 | 0 | 6 | 4,926 |
| Other | 2,444 | 139 | 2,583 | 0 | 16 | 0 | 0 | 0 | 0 | 16 | 2,600 |
| *Subtotal* | *17,802* | *5,190* | *22,992* | *0* | *0* | *0* | *0* | *0* | *0* | *0* | *22,992* |
| **Birch Bay** | | | | | | | | | | | |
| Residential - Single Family | 0 | 1,728 | 1,728 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1,728 |
| Residential - Multifamily | 0 | 1,281 | 1,281 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1,281 |
| Commercial | 0 | 551 | 551 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 551 |
| Industrial | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| *Subtotal* | *0* | *3,560* | *3,560* | *0* | *0* | *0* | *0* | *0* | *0* | *0* | *3,560* |
| **Blaine** | | | | | | | | | | | |
| Residential - Single Family | 2,505 | 494 | 2,999 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2,999 |
| Residential - Multifamily | 262 | 0 | 262 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 262 |
| Commercial | 347 | 0 | 347 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 347 |
| Industrial | 287 | 0 | 287 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 287 |
| Other | 144 | 0 | 144 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 144 |
| *Subtotal* | *3,545* | *494* | *4,039* | *0* | *0* | *0* | *0* | *0* | *0* | *0* | *4,039* |
| **Cherry Point** | | | | | | | | | | | |
| Industrial | 0 | 7,029 | 7,029 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 7,029 |
| *Subtotal* | *0* | *7,029* | *7,029* | *0* | *0* | *0* | *0* | *0* | *0* | *0* | *7,029* |
| **Columbia Valley** | | | | | | | | | | | |
| Residential - Single Family | 0 | 1,065 | 1,065 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1,065 |
| Residential - Multifamily | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Commercial | 0 | 40 | 40 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 40 |
| Industrial | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other | 0 | 40 | 40 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 40 |
| *Subtotal* | *0* | *1,145* | *1,145* | *0* | *0* | *0* | *0* | *0* | *0* | *0* | *1,145* |
| **Everson** | | | | | | | | | | | |
| Residential - Single Family | 421 | 108 | 529 | (60) | 0 | 0 | (1) | 0 | 0 | (61) | 468 |
| Residential - Multifamily | 124 | 0 | 124 | 0 | 0 | 0 | 4 | 0 | 0 | 4 | 128 |
| Commercial | 47 | 7 | 54 | 10 | 0 | 0 | (1) | 0 | 0 | 9 | 63 |
| Industrial | 173 | 42 | 215 | (26) | 0 | 0 | 0 | 0 | 0 | (26) | 189 |
| Other | 116 | 251 | 367 | 76 | 0 | 0 | (2) | 0 | 0 | 74 | 441 |
| *Subtotal* | *881* | *408* | *1,289* | *0* | *0* | *0* | *0* | *0* | *0* | *0* | *1,289* |

*Sources: Whatcom County and Cities, 2022 (Countywide Data Reporting Tool).*
*Notes: Acres 2016 represents acres as of March 31, 2016. Acres 2021 represents acres as of March 31, 2021. Numbers may not add up because of rounding.*

## Exhibit 74. Whatcom County Zoning Changes by Urban Growth Area and Land Use, Acres, 2016-2021

| UGA | City Zoning 2016 | County Zoning 2016 | Zoning 2016 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | Total Zoning Changes | Zoning 2021 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Ferndale** | | | | | | | | | | | |
| Residential - Single Family | 1,580 | 1,599 | 3,179 | (8) | 0 | 0 | 13 | (3) | 0 | 3 | 3,182 |
| Residential - Multifamily | 485 | 0 | 485 | 1 | 0 | 0 | 63 | (1) | 0 | 63 | 548 |
| Commercial | 1,628 | 31 | 1,659 | 7 | 0 | 0 | 33 | 4 | 0 | 44 | 1,703 |
| Industrial | 516 | 415 | 931 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 931 |
| Other | 112 | 89 | 201 | 0 | 0 | 0 | (109) | 0 | 0 | (109) | 92 |
| *Subtotal* | *4,321* | *2,134* | *6,455* | *0* | *0* | *0* | *0* | *0* | *0* | *0* | *6,455* |
| **Lynden** | | | | | | | | | | | |
| Residential - Single Family | 1,854 | 135 | 1,989 | 76 | 7 | (6) | (1) | (83) | 0 | (7) | 1,982 |
| Residential - Multifamily | 442 | 23 | 465 | 0 | 20 | 0 | 1 | 80 | 0 | 101 | 566 |
| Commercial | 479 | 0 | 479 | (6) | (27) | (3) | 0 | 0 | 0 | (36) | 443 |
| Industrial | 337 | 0 | 337 | 7 | 0 | 17 | 0 | 0 | 0 | 24 | 361 |
| Other | 189 | 446 | 635 | (77) | 0 | (8) | 0 | 3 | 0 | (82) | 553 |
| *Subtotal* | *3,300* | *604* | *3,904* | *0* | *0* | *0* | *0* | *0* | *0* | *0* | *3,904* |
| **Nooksack** | | | | | | | | | | | |
| Residential - Single Family | 350 | 95 | 445 | 0 | 0 | 0 | (31) | 0 | 0 | (31) | 414 |
| Residential - Multifamily | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Commercial | 35 | 0 | 35 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 35 |
| Industrial | 13 | 0 | 13 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 13 |
| Other | 45 | 11 | 56 | 0 | 0 | 0 | 31 | 0 | 0 | 31 | 87 |
| *Subtotal* | *443* | *106* | *549* | *0* | *0* | *0* | *0* | *0* | *0* | *0* | *549* |
| **Sumas** | | | | | | | | | | | |
| Residential - Single Family | 160 | 0 | 160 | (4) | 0 | 0 | 0 | 0 | 0 | (4) | 156 |
| Residential - Multifamily | 193 | 0 | 193 | (16) | 0 | 0 | 0 | 0 | 0 | (16) | 177 |
| Commercial | 71 | 0 | 71 | (1) | 0 | 0 | 0 | 0 | 0 | (1) | 70 |
| Industrial | 376 | 0 | 376 | 8 | 0 | 0 | 0 | 0 | 0 | 8 | 384 |
| Other | 135 | 26 | 161 | 13 | 0 | 0 | 0 | 0 | 0 | 13 | 174 |
| *Subtotal* | *935* | *26* | *961* | *0* | *0* | *0* | *0* | *0* | *0* | *0* | *961* |
| **Areas Outside UGAs** | | | | | | | | | | | |
| Rural one dwelling/two acres | N/A | 1,157 | 1,157 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1,157 |
| Rural one dwelling/five acres | N/A | 90,331 | 90,331 | (2) | 0 | 0 | 0 | 0 | 0 | (2) | 90,329 |
| Rural one dwelling/ten acres | N/A | 30,211 | 30,211 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 30,211 |
| Rural - Residential (LAMIRD) | N/A | 10,634 | 10,634 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 10,634 |
| Rural - Commercial (LAMIRD) | N/A | 1,286 | 1,286 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1,286 |
| Rural - Industrial (LAMIRD) | N/A | 494 | 494 | 2 | 0 | 0 | 0 | 0 | 0 | 2 | 496 |
| Agriculture | N/A | 86,276 | 86,276 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 86,276 |
| Rural Forestry | N/A | 36,208 | 36,208 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 36,208 |
| Commercial Forestry | N/A | 187,311 | 187,311 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 187,311 |
| Mineral Resource Lands | N/A | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| *Subtotal* | *N/A* | *443,908* | *443,908* | *0* | *0* | *0* | *0* | *0* | *0* | *0* | *443,908* |
| **Total** | **31,227** | **464,604** | **495,831** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **495,831** |

*Sources: Whatcom County and Cities, 2022 (Countywide Data Reporting Tool).*
*Notes: Acres 2016 represents acres as of March 31, 2016. Acres 2021 represents acres as of March 31, 2021. LAMIRD stands for "limited area of more intensive rural development" (see RCW 36.70A.070(5)(d)).*