

4.7. Population and Employment

This section provides information about current levels of population, housing, and employment in the County Planning Area, urban growth areas (UGAs), and rural areas. This section also assesses impacts of the alternatives on employment, housing, and population including growth rates, land capacity, and jobs/housing balance.

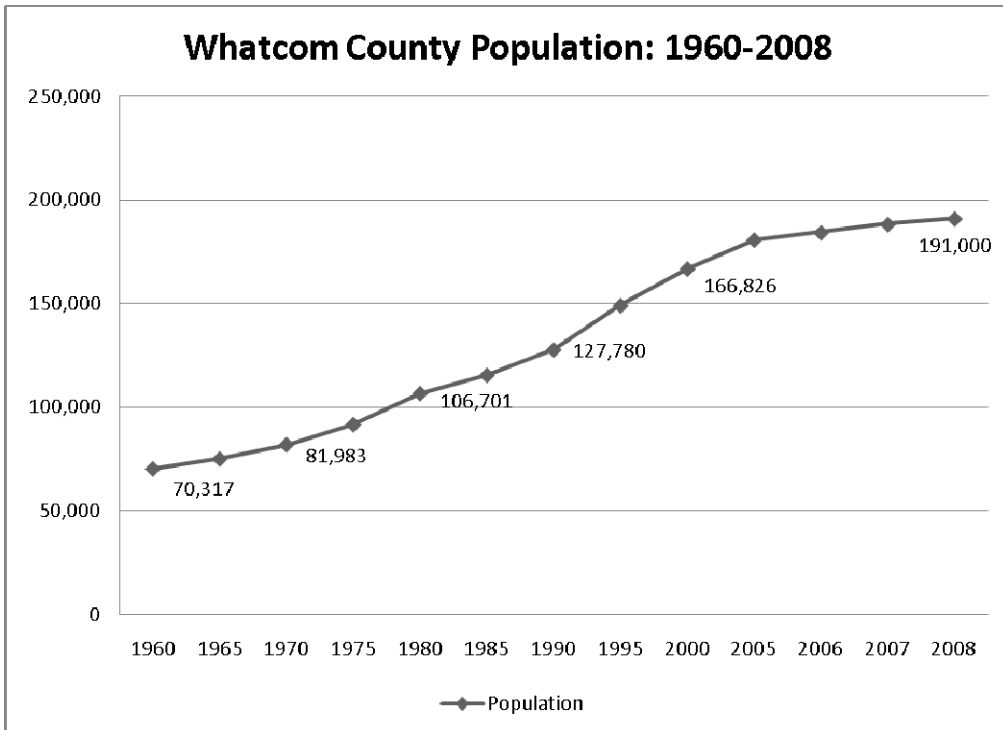
4.7.1. Existing Conditions

Population

Countywide

Whatcom County's (County's) population has grown from 70,317 in 1960 to 191,000 in 2008, a span of 48 years, as shown in Figure 4.7-1.

Figure 4.7-1. Whatcom County Population Growth (1960–2008)

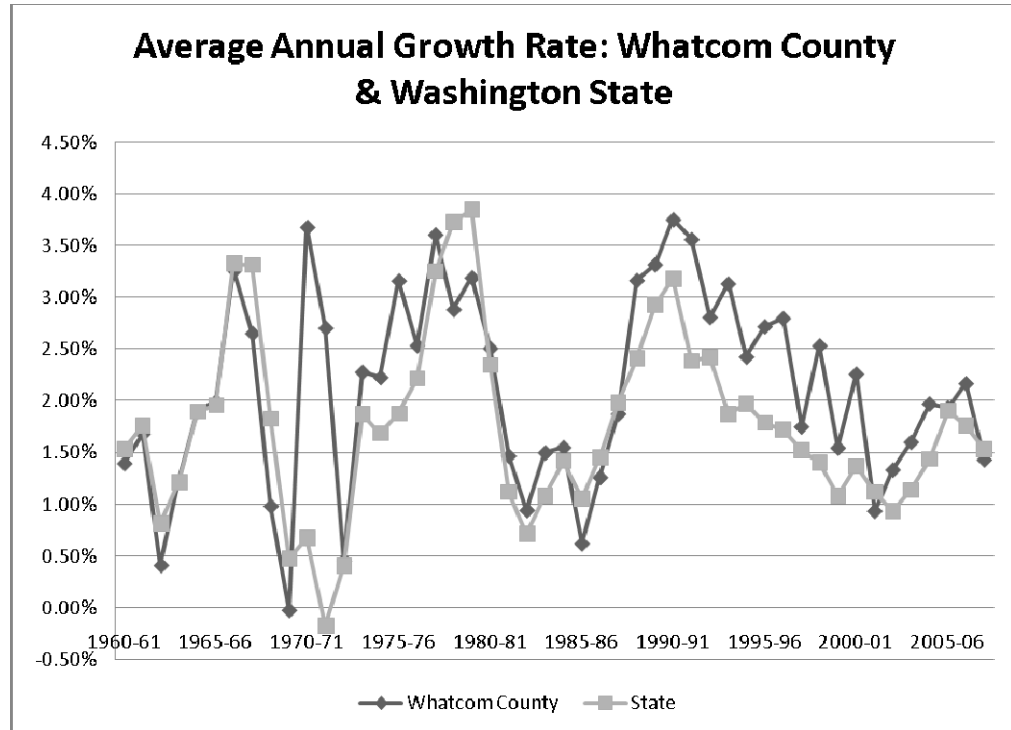


Source: Washington State Office of Financial Management, July 24, 2008

The County's average annual population growth rate from 1960 to 2008 was approximately 2.11% while the State of Washington's average annual growth rate was 1.76%. Between 1990 and 2008, the growth rates were 2.26% and 1.70% for the County and state, respectively. Reviewing the period 2000 to 2008, the growth rates were lower at 1.71% and 1.40% for the County and state, respectively. While the

County’s growth rate is generally higher than the state’s as a whole, the cycles of growth appear similar between the County and state overall as shown in Figure 4.7-2.

Figure 4.7-2. Average Annual Growth Rate–Whatcom County and Washington State (1960–2008)

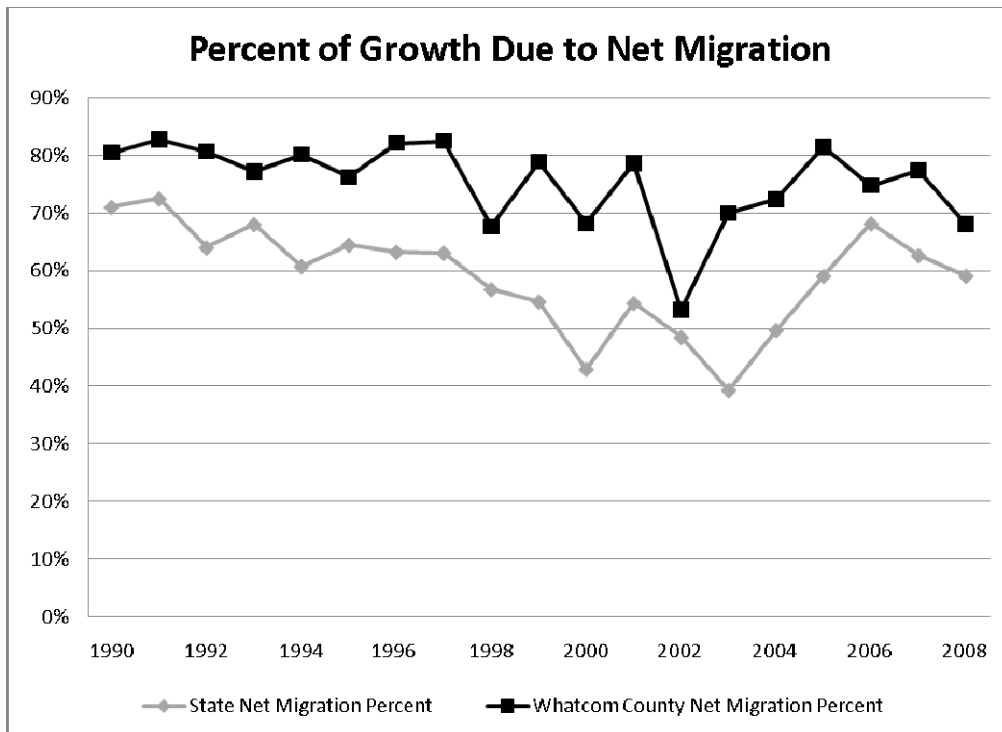


Source: Washington State Office of Financial Management, July 2008

Population growth is driven by three components of change: births, deaths, and migration. The difference of births minus deaths is considered the natural component of change, and net migration is considered the migration component of change.

In both the County and Washington State, the net migration component has been larger than the natural component of population increase (see Figure 4.7-3). The County’s percentage share of migration is larger than the state’s. On average, the state’s percentage of growth due to net migration has been about 59% between 1990 and 2008, dropping to 54% between 2000 and 2008. The County’s average percentage of growth due to net migration was about 75% between 1990 and 2008, also dropping to 72% between 2000 and 2008.

Figure 4.7-3. Percent of Growth Due to Net Migration–Whatcom County and Washington State (1990–2008)



Source: Washington State Office of Financial Management, October 2008

The Western Washington University Demography Lab has investigated natural increases in population independent of migration to answer the following question: If not one more person moved to the County, what is the expected natural growth rate over the next 20 years?

Based on the numbers in Table 4.7-1, the average annual rate of natural increase is 0.4235%. Running from a 2008 base population of 191,000 the County could expect a population of 217,796 in 2031. However, there is great variation in birth rates among sub-populations, which has not been factored into the equations. For example, Hispanic females in the child-bearing years have higher birth rates than whites (Burge pers. comm.).

Urban Growth Areas and Rural Study Areas

The Bellingham UGA contains the largest population in the County, and the Nooksack UGA the least, as of 2008 (see Table 4.7-2). UGA Study Areas represent UGA boundaries that include both incorporated cities and the unincorporated portion of UGAs as well as the County unincorporated UGAs.

Historically, Bellingham has taken the largest share of population growth, with the rural unincorporated County having the next highest share. After Bellingham, the UGAs receiving the greater shares of growth include Lynden, Ferndale, Columbia

Valley, and Birch Bay. Bellingham received the greatest share of population in the current comprehensive plan allocation. Rural areas were slated to take the least share of growth in the comprehensive plan, but have seen over three times as much growth in terms of share.¹

Table 4.7-1. Natural Increase (2000–2008)

Year	# Deaths	# Births	Natural Increase	Bellingham Est. Pop.	Whatcom Est Pop.
2000	1225	1974	749	67,171	166,814
2001	1271	1857	586	68,890	170,660
2002	1302	1895	593	69,260	172,200
2003	1307	1933	626	69,850	174,500
2004	1325	1960	635	71,080	177,300
2005	1320	2015	695	72,320	180,800
2006	1310	2087	777	73,460	184,300
2007	1444	2210	766	75,220	188,300
2008	1449	-	-	75,750	191,000

Source: Burge pers. comm. March 31, 2009

Table 4.7-2. Urban Growth Area and Rural Study Areas 2008 Population and Share of Growth

Study Area: UGA and Rural	2008 Population	Share of Population Growth (%)			
		Actual 1990–2000	Estimate 2000–2008	Estimate 1990–2008	Policy Based 2000–2022
Bellingham	89,284	43.0	46.9	44.5	51.4
Birch Bay	5,290	5.8	3.3	4.8	7.5
Blaine	5,754	3.2	4.5	3.7	4.6
Columbia Valley	3,924	5.2	5.9	5.5	3.7
Everson	2,395	1.3	0.6	1.0	2.4
Ferndale	12,019	7.6	8.6	8.0	10.8
Lynden	11,613	8.1	8.4	8.2	10.7
Nooksack	1,137	0.7	1.0	0.8	1.4
Sumas	1,279	0.5	1.2	0.8	1.0
Unincorporated Rural	58,304	24.7	19.7	22.8	6.3

¹ The 1990 and 2000 estimates are drawn from the current Whatcom County Comprehensive Plan with slight adjustments to account for shifts in UGA Study Area boundaries since adoption of the 2004 plan. The 2008 estimate was developed using State of Washington Office of Financial Management estimates for incorporated cities and countywide building permit data between 2000 and 2008 for unincorporated areas (Berk & Associates).

Study Area: UGA and Rural	2008 Population	Share of Population Growth (%)			
		Actual	Estimate	Estimate	Policy Based
		1990–2000	2000–2008	1990–2008	2000–2022
Total County	191,000	100.0	100.0	100.0	100.0

Source: Berk & Associates, January 13, 2009

Population Growth Projections

In 2002, the County commissioned a set of employment and population projections to help in development of its comprehensive plan. Specifically, the County contracted with the consulting firm ECONorthwest to project countywide population and employment growth through 2022. In the same year of 2002, the State Office of Financial Management (OFM) generated an update of its population forecasts for the state and County.

Both ECONorthwest and OFM have produced a set of baseline projections (a single set of projections that represent the most likely growth scenario based on their modeling). Each set of forecasts also includes high and low projections—projections that are intended to reflect the degree of uncertainty that exists around the baseline forecasts in question. The 2002 baseline ECONorthwest population projection equaled 231,928 persons for the year 2022. The 2002 OFM baseline projection equaled 236,837 persons for the year 2022. The population projection included in the current Whatcom County Comprehensive Plan is in the range of the two forecasts at 234,917.

Since 2002, OFM has updated its population projections for the County, with its most current, 2007, projections now extending through the year 2030. To help determine appropriate growth projection for the period 2029–2031, a comparison of how well ECONorthwest and OFM projections have tracked actual growth between 2000 and 2008 was performed. Based on a recent review by Berk & Associates (February 9, 2009), both the 2002 ECONorthwest and the 2002 OFM baseline forecasts performed reasonably well when compared with actual growth in the County through 2008 (as estimated by OFM). Of the two, the ECONorthwest 2002 forecast tracked more closely with actual growth, and when OFM developed new forecasts in 2007, its new baseline forecast moved a bit closer to ECONorthwest’s 2002 forecast.

The County has a new planning horizon of 2029–2031. The future selected population projection will be in the range of OFM projections and will ensure no more than a 20-year supply of land, as required by the Growth Management Act (GMA).

To consider a new forecast extended from the current Whatcom County Comprehensive Plan horizon year of 2022 to the new range of 2029 to 2031, Berk & Associates developed extrapolations of OFM’s 2007 projection and

ECONorthwest’s 2002 baseline projection . Table 4.7-3 identifies the OFM and ECONorthwest projection and extrapolations. Also identified are adopted or proposed projections under review in the County’s 10-Year UGA Review process.

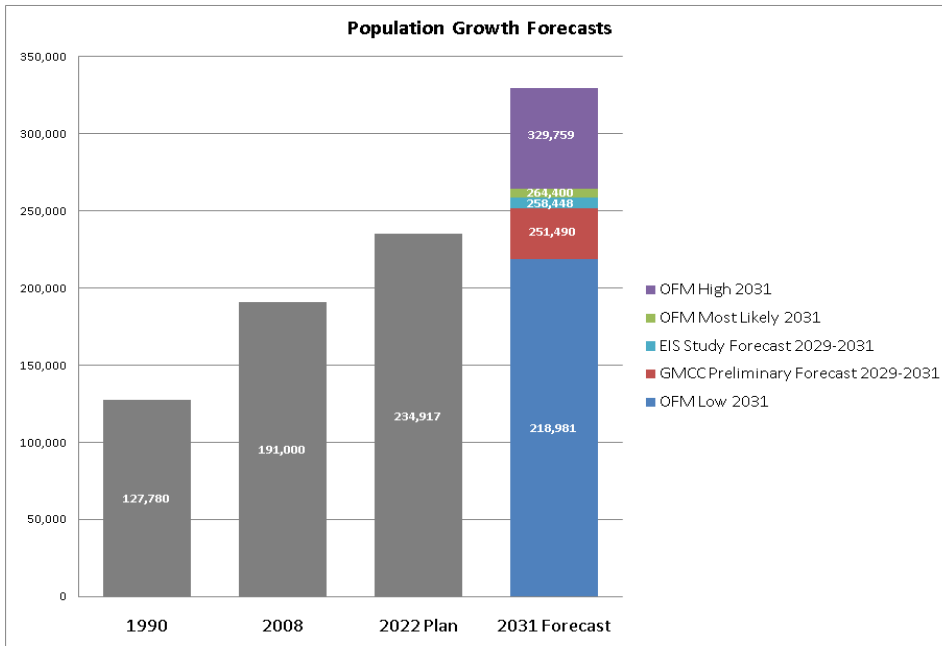
Table 4.7-3. OFM and ECONorthwest 2022 to 2031 Population Forecasts and Extrapolations

Year	ECONorthwest	OFM Low	OFM Baseline (Most Likely)	OFM High	Forecasts Under Review
2022	231,928	205,838	236,634	281,170	
2023	234,765	207,554	239,924	286,625	
2024	237,588	209,270	243,182	292,080	
2025	240,396	210,985	246,406	297,535	
2026	243,191	212,314	249,474	302,859	
2027	245,971	213,642	252,440	308,183	
2028	248,738	214,971	255,457	313,508	
2029	251,490	216,300	258,448	318,832	
2030	254,228	217,628	261,416	324,156	
2031	256,952	218,981	264,400	329,759	
Current Plan (adopted)					234,917
GMCC Preliminary Forecast					251,490
EIS Study Forecast					258,448

Notes: Italicized numbers identify extrapolations of forecasts by Berk & Associates
 Current Plan = Whatcom County Comprehensive Plan as currently adopted for the year 2022
 GMCC = Growth Management Coordinating Council a regional body of elected officials representing the County and cities; the GMCC preliminarily selected a growth forecast of 251,490 for consideration by the jurisdictions
 EIS = Forecasts under review in this Environmental Impact Statement for all alternatives except the No Action Current Comprehensive Plan Alternative
 Source: State of Washington Office of Financial Management, October 2007; Berk & Associates, February 9, 2009

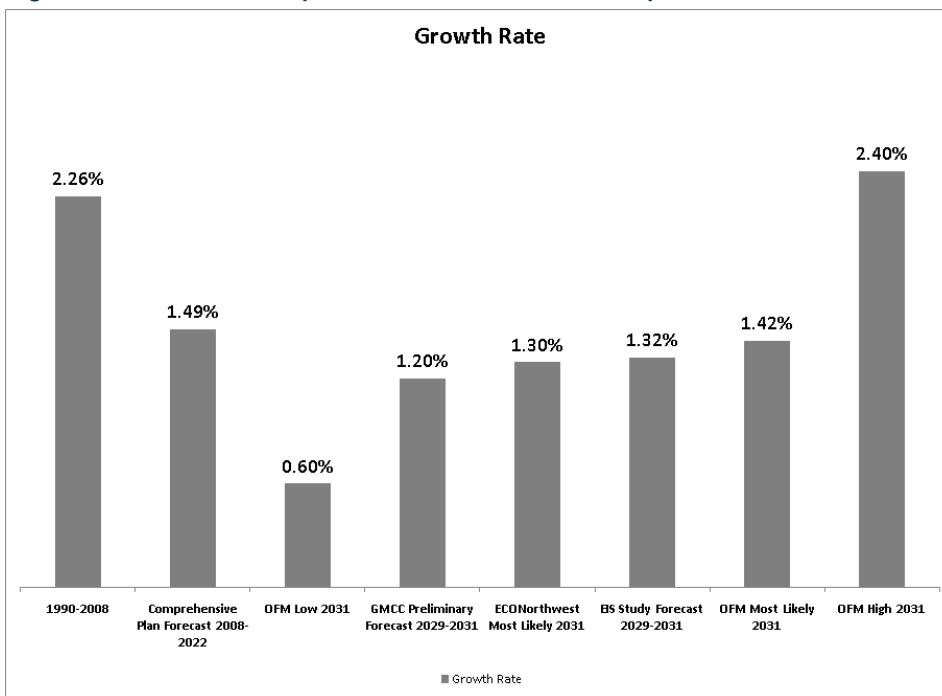
Figure 4.7-4 illustrates the various projections and Figure 4.7-5 illustrates the various growth rates. Except for the OFM High forecast, all other projections predict lower growth rates than historically experienced from 1990 to 2008.

Figure 4.7-4. Population Growth Projections



Source: Washington State Office of Financial Management, October 2007; ICF Jones & Stokes

Figure 4.7-5. Annual Population Growth Rates Comparison



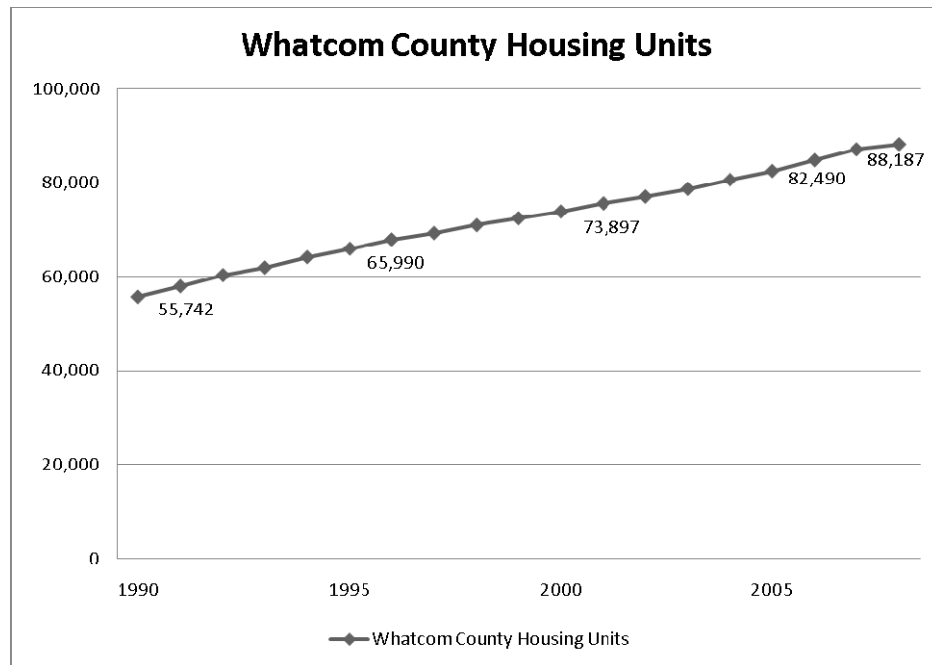
Source: Washington State Office of Financial Management; October 2007 and July 2008 ICF Jones & Stokes

Housing

Countywide

The County as a whole contains over 88,000 housing units as of 2008. Figure 4.7-6 shows the annual total County housing units between 1990 and 2008.

Figure 4.7-6. Total Whatcom County Housing Units (1990–2008)



Source: Washington State Office of Financial Management, January 16, 2009

The County’s housing stock as a whole is predominantly single family, but recently has seen a shift towards a greater percent of multifamily units (see Table 4.7-4).

Table 4.7-4. Whatcom County Housing Unit Inventory

Year	Total	1 Unit	2+ Units	Mobile Home/Special
2008	88,187	55,762	21,795	10,630
2008 Share	100%	63%	25%	12%
2000	73,897	47,187	17,175	9,535
2000 Share	100%	64%	23%	13%
2000-2008 % change	19%	18%	27%	11%

Source: Washington State Office of Financial Management, June 30, 2008

Not all dwellings are occupied on a full time basis, as described below.

Housing Affordability

Agencies that fund affordable housing to low and moderate income households have a specific meaning for affordable housing—that is, those that pay more than 30% of their income to housing, particularly those that earn less than the county median income are considered to be households in need of affordable housing.

As of 2007, OFM estimates the County median income was \$50,375. American Community Survey Estimates of Household incomes in 2007 are lower at \$46,506. According to the American Community Survey results for 2007, over 52% of renters are paying more than 30% of their income for housing costs and nearly 5% of owners are likewise paying more than 30% of their income for housing costs. The percentages shift when considering only those households that earn less than the county median income: About 49% of renters and 17% of homeowners earning less than the median income are paying more than 30% of their income for rent or mortgage costs.

Sales of existing homes have recently fallen over 36% between 2008 and 2009. Building permits countywide have likewise fallen by 48.7% over the last year. Existing housing resale prices have declined with the change in the economy though only by 7.4%. Homebuyers already owning a home are more likely to afford another home than a first-time homebuyer. About 97.9% of homebuyers who already own a home could afford the median price home, while only 54.8% of first-time homebuyers could afford a median price home in the County as of the fourth quarter of 2008 (Washington Center for Real Estate Research/Washington State University 2009).

In 2008, the number of homeless was counted. Compared to 2007, the number of homeless persons increased from 1,298 to 1,326. Over the same period, the number of homeless households increased from 871 to 891. The reasons for homelessness varied from loss of job or housing, or lack of ability to pay for rent or mortgage to mental illness, drug abuse, and criminal history (Whatcom County Health Department et al. 2008).

Urban and Rural Study Areas

Much of the County, particularly in unincorporated areas, has a share of second homes. For this reason, housing occupancy rates vary by location. See Table 4.7-5 with adjusted U.S. Census occupancy rate estimates.

Within occupied dwellings, there are approximately 74,700 households in the County with nearly half living in Bellingham or its UGA. The next greatest number of households lives in the unincorporated portion of the County. Other larger shares of households are in Lynden and Ferndale. See Table 4.7-6.

Table 4.7-5. Occupancy Rates by Community

Location	Single Family	Multifamily
Bellingham City	94.4	91.1
Blaine City	85.5	81.8
Everson City	94.0	88.5
Ferndale City	93.3	92.5
Lynden City	95.0	88.1
Nooksack City	96.8	97.6
Sumas City	95.2	93.9
Birch Bay UGA	64.7	36.9
Columbia Valley UGA	89.7	N/A

Sources: City Occupancy Rates based on 2008 OFM data; Birch Bay estimates based on 2000 US Census as adjusted by 2007 American Community Survey; Columbia Valley estimates based on Draft Foothills Subarea Plan (2007).

Table 4.7-6. Households by Urban Growth Area and Rural Study Area

Study Area: UGA and Rural	2008 Households
Bellingham	36,358
Birch Bay	2,433
Blaine	2,355
Columbia Valley	1,318
Everson	868
Ferndale	4,364
Lynden	4,441
Nooksack	371
Sumas	473
Unincorporated Rural ¹	21,688
Total	74,669

¹ Lands in the County Planning Area outside of UGAs.

Source: Berk & Associates

The County's average household size is approximately 2.5. Household sizes are larger in the smaller communities generally reflecting a more single family character. See Table 4.7-7.

Table 4.7-7. Average Household Size by Community

Location	Average Household Size		
	Single Family	Multifamily	All Units
Bellingham City	2.52	1.87	2.21
Blaine City	2.59	2.16	2.46
Everson City	2.95	3.00	2.96
Ferndale City	2.90	2.52	2.77
Lynden City	2.91	1.73	2.59
Nooksack City	3.17	2.68	3.06
Sumas City	2.85	2.21	2.54
Birch Bay UGA	2.40	1.99	2.29
Columbia Valley UGA	2.79	4.48	3.16

Sources: City Occupancy Rates based on 2008 OFM data; Birch Bay and Columbia Valley estimates based on 2000 US Census as adjusted by 2007 American Community Survey.

Permit History

Most new dwellings were constructed in UGAs in the period 2000-2008 as shown in Table 4.7-8. Rural units made up 26% of the total new county units.

Table 4.7-8. Extent of Urban and Rural Growth in Housing Units (2000–2008)

Study Area	Location	SF Units	MF Units	Subtotal	% of UGA	Total (%)
Bellingham	City	1,584	3,739	5,323	87.5	50.8
	Uninc. UGA	748	13	761	12.5	7.3
Birch Bay	Uninc. UGA	1164	108	1272	100.0	12.1
Columbia Valley	Uninc. UGA	215	0	215	100.0	2.1
Ferndale	City	750	150	900	94.8	8.6
	Uninc. UGA	49	0	49	5.2	0.5
Lynden	City	755	278	1,033	100.0	9.9
	Uninc. UGA	0	0	-	0.0	0.0
Blaine	City	336	140	476	79.1	4.5
	Uninc. UGA	126	0	126	20.9	1.2
Sumas	City	61	65	126	100.0	1.2
	Uninc. UGA	0	0	-	0.0	0.0
Everson	City	60	8	68	97.1	0.6
	Uninc. UGA	2	0	2	2.9	0.0
Nooksack	City	101	1	102	81.6	1.0
	Uninc. UGA	23	0	23	18.4	0.2

Study Area	Location	SF Units	MF Units	Subtotal	% of UGA	Total (%)
Total Urban	City and UGA	5,974	4,502	10,476		100
Total Rural	Uninc.	3,645	21	3,666		
Total County	All	9,619	4,523	14,142		

SF = single family; MF = multifamily

Source: Whatcom County Planning and Development Services 2009a

Typically new lots in the urban areas will be created in the cities or UGAs when urban services are available. In the rural areas, urban services are not expected though a water source is required. The rural area has an abundance of vacant lots in rural and resource lands as shown on Table 4.7-9. Vacant lots that are legally created can be the location of future dwellings. In addition, subdivision of larger lots may occur and provide additional locations for dwellings. Between existing vacant lots and the total development potential, between 46,000 and 66,500 persons could be accommodated in rural and resource lands located outside of the UGAs (assuming an average 2.49 household size).

Table 4.7-9. Vacant and Developable Lots in Rural and Resource Lands

Location	# Existing Vacant Parcels	Estimated Additional Development Rights (Buildout)	Estimated Total Potential Development Rights
Rural Zones	5,018	3,064	8,082
LAMIRD Study Zones	9,543	3,910	13,453
Subtotal Rural	14,561	6,974	21,535
Agriculture	2,075	57	2,132
Rural Agricultural Study Area	926	840	1,766
Rural Forestry	927	359	1,286
Commercial Forestry	-	-	-
Subtotal Resource	3,928	1,256	5,184
Total Rural and Resource	18,489	8,230	26,719

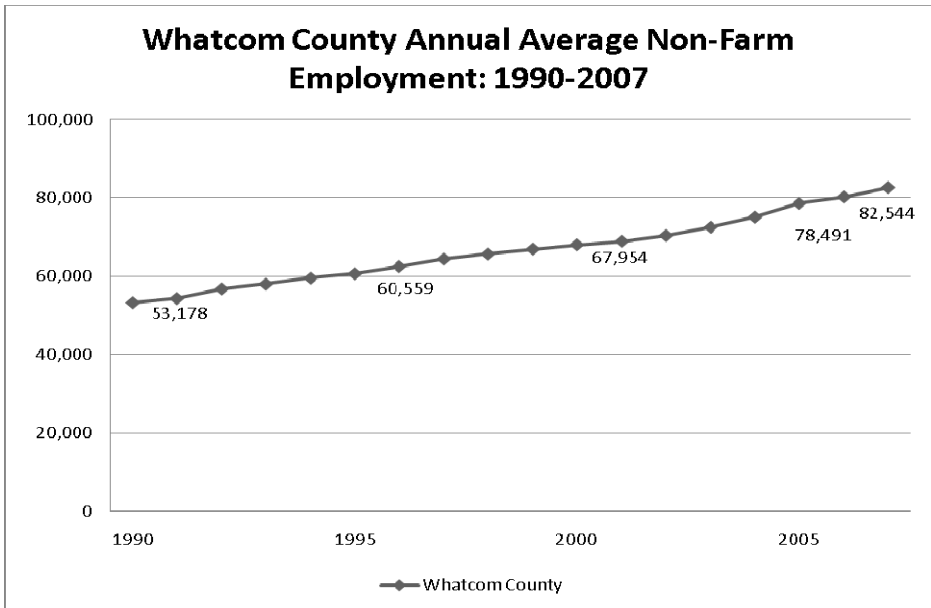
Source: Whatcom County Planning and Development Services 2009a

Employment

Countywide

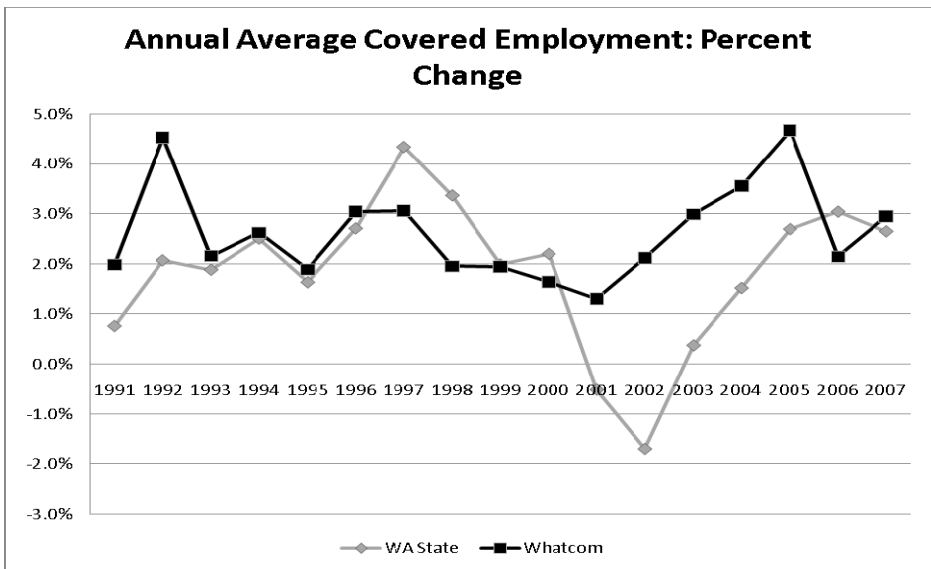
The County has generally seen positive job growth on an annual average basis from the years 1990 to 2007 (see Figure 4.7-7). The County's average annual job growth rate for the same period has generally been higher than the state as a whole as shown in Figure 4.7-8.

Figure 4.7-7. Annual Average Employment (1990–2007)



Source: Washington State Employment Security Department, 2008

Figure 4.7-8. Annual Average Employment Growth Rate (1990–2007)



Source: Washington State Employment Security Department, 2008

As of 2008, the County has about 84,850 non-farm jobs. Most are commercial jobs. See Table 4.7-10.

Table 4.7-10. Total Whatcom County Jobs (Non-Farm)

Sector	Estimated Non-Agricultural Jobs 2008
Commercial	43,828
Retail	18,772
Industrial	22,250
Total Allocated Jobs	84,850

Source: Washington State Employment Security Department; Berk & Associates, January 13, 2009

Recent statistics show some job losses due to the current economic recession comparing 2008 and 2009 figures for January of each year. There is a slight improvement over the last month comparing January to February 2009. See Table 4.7-11.

Table 4.7-11. Nonagricultural Wage and Salary Employment in Whatcom County

Estimates of Total Non-Farm Jobs				Percentage Change		
Feb-09	Jan-09	Feb-08	Jan-08	Jan-09	Feb-08	Jan-08
82,300	82,100	84,600	84,500	0.2	-2.3	0.1

Note: Excludes proprietors, self-employed, members of armed forces, and private household employees. Includes all full- and part-time wage and salary workers receiving pay during the pay period including the 12th of the month.

Source: Washington State Employment Security Department, March 2009

Similarly, the unemployment rate has risen in the last year as shown in Table 4.7-12. The County's unemployment rate is lower than the state as a whole.

Table 4.7-12. Resident Labor Force, Employment, and Unemployment Rate in Washington State and Whatcom County (2008 and 2009)

Areas/Period	Labor Force	Employment	Unemployment	Unemployment Rate
February 2008				
Washington State	3,437,760	3,256,730	181,040	5.3
Bellingham MSA (Whatcom County)	108,160	102,810	5,360	5.0
January 2009				
Washington State	3,519,410	3,215,760	303,650	8.6
Bellingham MSA (Whatcom County)	110,580	101,880	8,700	7.9
February 2009				

Areas/Period	Labor Force	Employment	Unemployment	Unemployment Rate
Washington State	3,554,920	3,224,350	330,570	9.3
Bellingham MSA (Whatcom County)	110,630	101,680	8,950	8.1

Date Data Issued: March 17, 2009; Benchmark: March 2008
Source: Washington State Employment Security Department, March 17, 2009.

Urban and Rural Study Areas

Similar to population, the Bellingham UGA contains the most current jobs. Rural jobs are next most prevalent. After Bellingham, Ferndale, Lynden, and Blaine UGAs contain the most jobs. See Table 4.7-13.

Table 4.7-13. Employment by Urban Growth Area and Rural Study Areas (2008)

Study Area UGA and Rural Area	Retail	Commercial	Industrial	Total
Bellingham	13,376	27,968	9,809	51,153
Birch Bay	91	309	37	436
Blaine	287	1,743	941	2,971
Cherry Point	0	200	982	1,182
Columbia Valley	23	42	25	90
Everson	121	262	255	638
Ferndale	959	1,875	2,700	5,534
Lynden	1,292	2,289	1,251	4,832
Nooksack	57	19	131	206
Sumas	5	27	223	254
Rural	935	5,255	3,940	10,130
Total County ¹	17,145	39,987	20,293	77,426

¹ These data do not add up to the Washington State Employment Security Department's (ESD's) current estimate of non-agriculture wage and salary employment for the County as a whole (84,850) likely due to jobs for which ESD was unable to assign a specific location.

Source: Washington State Employment Security Department; Berk & Associates, January 13, 2009

Jobs/Housing Balance

Jobs/housing balance is a measure of the degree of equilibrium between employment and dwelling units in a specific area. It is typically calculated based on the number of jobs in a community divided by the number of housing units in that community. A low jobs/housing ratio indicates a housing-rich "bedroom community," while a high jobs/housing ratio indicates an employment center. Jobs/housing balance ratios give information relevant to likely home-work travel patterns.

Some research shows that the jobs-housing relationship is complex and such standards should be used as generalized indicators, but that there are several techniques to consider when determining how to reduce home-work travel, including, but not limited to (California Planning Roundtable 2008):

- Emphasize tradeoffs between housing affordability and travel costs.
- Facilitate mixed use, infill and contiguous development.
- Design growth patterns that optimize use of transportation systems.
- Consider parking strategies.
- Confront the challenges of public financing.
- Benefit from regional and local cooperation.

The current jobs/housing ratio countywide is approximately 1.13 assuming 84,850 jobs and 74,669 households as of 2008. This means that there are more jobs than households in the County. The County as a whole is attracting employees from outside the County as well as inside the County.

A related measure is a jobs per capita or jobs/population ratio. The results are shown by UGA in Table 4.7-14. Data below include total population, not all of which are in the workforce, and as a result the ratios should be reviewed in an order of magnitude fashion.

Table 4.7-14. Jobs/Population Balance by Urban Growth Area and Rural Study Area

Study Area UGA and Rural Area	2008 Jobs: ESD ¹	2008 Jobs: InfoUSA	2008 Population	2008 Jobs/ Housing Ratio - ESD	2008 Jobs/ Housing Ratio - InfoUSA
Bellingham	51,153	56,213	89,284	57.3%	63.0%
Birch Bay	436	734	5,290	8.2%	13.9%
Blaine	2,971	3,069	5,754	51.6%	53.3%
Cherry Point	1,182	1,356	0	0.0%	0.0%
Columbia Valley	90	149	3,924	2.3%	3.8%
Everson	638	878	2,395	26.6%	36.7%
Ferndale	5,534	5,576	12,019	46.0%	46.4%
Lynden	4,832	5,524	11,613	41.6%	47.6%
Nooksack	206	187	1,137	18.1%	16.5%
Sumas	254	412	1,279	19.9%	32.2%
Rural	10,130	10,752	58,304	17.4%	18.4%
Total County	77,426	84,850	191,000	40.5%	44.4%

¹ These data do not add up to the Washington State Employment Security Department's (ESD's) current estimate of non-agriculture wage and salary employment for the County as a whole (84,850) likely due to jobs

for which ESD was unable to assign a specific location.

Source: Washington State Employment Security Department; Berk & Associates and ICF Jones & Stokes

Forecasts

The County and cities are using labor participation rates and employment rates applied to population forecasts to estimate potential future employment. For purposes of this discussion, the term employment rate is used to signify the ratio between county employee counts and county population. While labor participation rates refer to the share of population that are in the labor force, employment rates refer to the actual number of jobs. Employment rates can be expected to be perhaps 4% lower than labor participation rates, reflecting (1) persons who are in the labor force but who are currently unemployed, and (2) the effect of persons who hold more than one job (Berk & Associates 2009).

Rates assumed are:

- labor participation rate: 53% of total county population
- employment rates: 49% of population

Employment rates of 49% are consistent with the average in Washington State over the last 18 years and with the average in the County from 1990 to 2003. The most recent Washington State Employment Security Department (ESD) employment data suggest that the County's employment rate has surged in recent years to 54%, a significant departure from historic norms. Analysts at ESD suggest that this strong growth in the rate of employment has been driven by strong growth in the County in recent years. Over the long-term, forecasters at ESD expect labor force participation to decrease as the baby boom generation transitions into retirement, decreasing to a bit below 50% of the state's total population (Berk & Associates 2009).

Based on the population forecasts described earlier in this section and an employment rate of 49%, the following employment levels are forecast (Table 4.7-15).

Table 4.7-15. Population and Associated Employment Forecasts

	2008 ¹	Current Comprehensive Plan ²	GMCC Preliminary Forecast 2029–2031 ³	EIS Study Forecast 2029–031 ³
Population	191,000	234,917	251,490	258,448
Employment	84,850	110,933	118,759	122,044

¹ 2008 Actual

² Current comprehensive plan population and ECONorthwest employment forecast for 2022

³ Employment rate of 0.49 applied to total population then adjusted to remove agricultural jobs using a factor of 0.96.

Source: Berk & Associates

Recent Trends

Some participants in the 10-Year UGA Review process have noted that future trends may be different than past trends for the County based on national, state, and local trends. Some believe that the projections for growth may be less optimistic than presented in the population and employment forecasts above. Some of the information pointed to includes:

- a decline in net-migration in the last year in Washington State (see Figure 4.7-3);
- a fall in county and city building permits over the last year (see Housing Affordability discussion above);
- relatively high vacant and seasonal housing rate; (see Housing Occupancy information in Table. 4.7-5 also Burge pers. comm.);
- a reduction in school enrollment as the Baby Boomer echo effect produces a lower birth rate (Burge pers. comm.);
- Western Washington University enrollment at a maximum of 13,000 (current enrollment) instead of 15,000 (Burge pers. comm.); and
- an increase in unemployment rate (see Table 4.7-12).

Other participants note the economic recessions in the early 1990s and early 2000s that are factored into the historic trends that have been examined in developing the current forecasts.

Additionally, the OFM low projection could potentially be met only by natural increase (see Countywide Population discussion above). With in-migration the population of the County would likely be above the OFM low forecast.

County decision-makers will determine the appropriate growth forecasts for the 10-Year UGA Review project. Annual, 7-year, and 10-Year UGA Review cycles for the comprehensive plan will allow the County and cities to respond to changing conditions.

4.7.2. Impacts

Impacts Common to All Alternatives

All alternatives provide capacity for increased population, housing, and employment, although to different degrees and in different locations. The ability of each alternative to accommodate the population and employment forecasts is described below by alternative.²

² The land capacity analysis represents a draft method developed as of February 2009 and subject to public hearings in December 2008 and February 2009. Since the draft land capacity analysis method allows for city and County modifications to certain factors based on local information (e.g., city or other local wetlands data, employment rates, etc.), it is possible that future modifications to the method, if approved, may alter the balance between land demand and supply that is reported in this document.

Secondary, indirect impacts of growth under each alternative would likely include potential encroachment near natural environmental resources, increases in demand for facilities and infrastructure, and other effects. These secondary impacts are described in other sections of this Draft Environmental Impact Statement (Draft EIS).

No Action Current Comprehensive Plan Alternative

The No Action Current Comprehensive Plan Alternative assumes a population growth rate of approximately 1.49% between 2008–2022 period, or 0.9% when extending the forecast between 2008 and 2031. Total population growth of 234,917 would add 43,917 persons over the present 191,000 population.

The No Action Current Comprehensive Plan Alternative would allocate most growth to the Bellingham UGA with another larger share to Ferndale and Lynden. The No Action Current Comprehensive Plan Alternative generally has more than enough residential land capacity to meet the projected growth as shown in Table 4.7-16. All UGAs are oversized for population capacity except for Lynden. UGAs that are oversized will need to be modified to be in balance with the growth allocation, which may include changes to the mix of land uses (e.g., employment versus residential), changes to the mix of densities (e.g., single family versus multifamily), and/or changes to UGA boundaries (e.g., reductions). Undersized UGAs may require increased densities, or if increased densities are not feasible, then UGA expansion.

Table 4.7-16. No Action Current Comprehensive Plan Alternative–Residential Land Capacity Review

Study Area: UGA	2008 Population	Population Growth Forecast ¹	Growth Share ² (%)	Residential Land Needed (Acres)	Surplus or (Deficit) Capacity (Acres)
Bellingham	89,284	22,580	51.4	798	496
Birch Bay	5,290	3,299	7.5	338	431
Blaine ³	5,754	2,040	4.6	0 ²	1,945
Columbia Valley	3,924	1,076	2.4	113	209
Everson	2,395	1,068	2.4	81	128
Ferndale	12,019	4,764	10.8	271	1,075
Lynden	11,613	4,705	10.7	356	(73)
Nooksack	1,137	636	1.4	32	69
Sumas	1,279	390	0.9	34	84

¹ The current comprehensive plan residual allocations accounting for growth between 2000 and 2008 differ from figures shown in this column. The reason is due to the rural growth already exceeding its growth allocation as of 2008. Instead, the figures in this column reflect a reallocation of the remaining growth of 43,917 based on comprehensive plan shares of growth with no individual allocation exceeding its original allotment except Rural.

² Rural growth share is 7.6%. Added to UGA growth shares, the total is approximately 100%.

³ The city has enough capacity to accommodate the growth in its city limits. While mathematically the city limits are "oversupplied" by 168 acres, the result is shown as zero here since city limits are automatically included in a UGA.

Sources: Berk & Associates and ICF Jones & Stokes; Whatcom County Planning and Development Services 2009b

The rural population projection of 3,359 additional persons (assuming a growth rate of 7.6%)³ would require an additional 1,500 dwellings approximately assuming a 2.49 household size and an 87.5% occupancy rate⁴. The rural and resource land area has more than enough opportunities with a build out capacity of 26,719 lots described in Section 4.7.1. Without incentives or requirements to direct rural growth to the UGAs, it may be difficult to avoid conversion of some agricultural lands to residential dwellings.

Similar to population, the No Action Current Comprehensive Plan Alternative would allocate most job growth to the Bellingham UGA with another larger share to Lynden and Ferndale. Most new jobs would be commercial, similar to existing conditions, but substantial industrial jobs would also be added. See Table 4.7-17.

Table 4.7-17. No Action Current Comprehensive Plan Alternative Job Growth Allocation by Sector

Study Area: UGA and Rural	Commercial	Retail	Industrial	Total
Bellingham	10,555	2,763	5,511	18,829
Birch Bay	184	21	0	205
Blaine	544	93	351	988
Cherry Point	67	0	436	503
Columbia Valley	20	24	1	45
Everson	12	10	141	163
Ferndale	526	198	562	1,286
Lynden	868	278	497	1,643
Nooksack	0	8	13	21
Sumas	13	8	103	124
Unincorporated Rural	691	199	1,386	2,276
Total	13,480	3,602	9,001	26,083

Source: ECONorthwest Inc. 2002; Berk & Associates

³ The original rural growth allocation for the year 2000 to 2022 based on a share of 6.3% has been exceeded as of 2008 by about 687 persons (4,299 were expected between 2000 and 2022; about 4,986 persons are estimated to have moved into rural areas between 2000 and 2008). Thus for the purposes of this Draft EIS, in order to test an additional amount of rural growth between the present and the horizon year, the No Action Current Comprehensive Plan Alternative reflects a reallocation of the remaining growth of 43,917 based on comprehensive plan shares of growth with no individual study area exceeding its original allocation except rural.

⁴ The household size and occupancy rates are based on a countywide average for all units and households using 2000 U.S. Census data adjusted by 2007 American Community Survey data. Prepared by Berk & Associates.

The No Action Current Comprehensive Plan Alternative has enough capacity to meet the projected job growth as shown in Table 4.7-18. All UGAs are oversized for job capacity except for Blaine. UGAs that are oversized will need to be modified to be in balance with the growth allocation, which may include changes to job type (e.g., industrial versus retail which is more land intensive), and/or changes to UGA boundaries (e.g., reductions). The small deficit in employment in Blaine could be easily offset with a rezone of residential land to employment given the oversupply of residential land described above.

Table 4.7-18. No Action Current Comprehensive Plan Alternative–Employment Land Capacity Review

Study Area: UGA	2008 Employment ¹	Employment Growth Forecast	Growth Share ² (%)	Employment Land Needed (Acres)	Surplus or (Deficit) Capacity (Acres)
Bellingham	51,153	18,829	72.2	1,272	79
Birch Bay	436	205	0.8	0	69
Blaine	2,971	988	3.8	127	(37)
Cherry Point	1,182	503	1.9	547	921
Columbia Valley	90	45	0.2	4	47
Everson	638	163	0.6	50	125
Ferndale	5,534	1,286	4.9	197	364
Lynden	4,832	1,643	6.3	248	161
Nooksack	206	21	0.1	3	28
Sumas	254	124	0.5	27	122

¹ 2008 data may be underestimated likely due to jobs for which ESD was unable to assign a specific location (see Table 4.7-13).

² The rural employment share would be 8.7%. Added to UGA growth shares, the total is approximately 100%.

Sources: Berk & Associates and ICF Jones & Stokes; Whatcom County Planning and Development Services 2009b

The jobs/housing balance countywide would be approximately 1.21, greater than the 2008 ratio of 1.13. However, as most jobs are allocated to Bellingham, the smaller urban communities would have less opportunity to create independent job centers.

Table 4.7-19 shows the jobs/population ratio for the No Action Current Comprehensive Plan Alternative. The jobs/population ratio would increase for Bellingham UGA and Rural areas. Other UGAs would have a similar or lower jobs/population ratio.

Table 4.7-19. No Action Current Comprehensive Plan–Jobs/Population Balance by UGA and Rural Study Area

Study Area UGA and Rural Area	Jobs/ Housing Ratio: 2008 ¹	Additional Growth Ratio	Total Allocation Ratio
Bellingham	63.0%	83.4%	67.1%
Birch Bay	13.9%	6.2%	10.9%
Blaine	53.3%	48.4%	52.0%
Cherry Point	0.0%	0.0%	0.0%
Columbia Valley	3.8%	4.2%	3.9%
Everson	36.7%	15.3%	30.1%
Ferndale	46.4%	27.0%	40.9%
Lynden	47.6%	34.9%	43.9%
Nooksack	16.5%	3.3%	11.8%
Sumas	32.2%	31.8%	32.1%
Rural	18.4%	67.8%	21.1%
Total County	44.4%	59.4%	47.2%

¹ Based on 2008 InfoUSA data as summarized in Table 4.7-14.

Source: Washington State Employment Security Department; Berk & Associates and ICF Jones & Stokes

No Action Trends Alternative

The No Action Trends Alternative assumes a population growth rate of approximately 1.32% between 2008 and 2031. Total population growth of 258,448 would add 67,448 persons over the present 191,000 population.

The No Action Trends Alternative would allocate most growth to the Bellingham UGA though less of a share than the No Action Current Comprehensive Plan Alternative. The No Action Trends Alternative generally has more than enough residential land capacity to meet the projected growth as shown in Table 4.7-20. All UGAs are oversized for population capacity except for Lynden and Columbia Valley. UGAs that are oversized will need to be modified to be in balance with the growth allocation, which may include changes to the mix of land uses (e.g., employment versus residential), changes to the mix of densities (e.g., single family versus multifamily), and/or changes to UGA boundaries (e.g., reductions). Undersized UGAs may require increased densities or if increased densities are not feasible, then UGA expansion.

Table 4.7-20. No Action Trends Alternative–Residential Land Capacity Review

Study Area: UGA	2008 Population	Population Growth Forecast	Growth Share ¹	Residential Land Needed (Acres)	Surplus or (Deficit) Capacity (Acres)
Bellingham	89,284	30,017	44.5%	1,190	103
Birch Bay	5,290	3,239	4.8%	342	426
Blaine ²	5,754	2,482	3.7%	0	1,897
Columbia Valley	3,924	3,684	5.5%	394	(72)
Everson	2,395	677	1.0%	53	157
Ferndale	12,019	5,370	8.0%	301	1,045
Lynden	11,613	5,517	8.2%	423	(141)
Nooksack	1,137	555	0.8%	28	73
Sumas	1,279	520	0.8%	78	40

¹ Rural growth share is 22.8%. Added to UGA growth shares, the total is approximately 100%.

² The city has enough capacity to accommodate the growth in its city limits. While mathematically the city limits are "oversupplied" at 120 acres, the result is shown as zero here since city limits are automatically included in a UGA.

Sources: Berk & Associates and ICF Jones & Stokes; Whatcom County Planning and Development Services 2009b

With the No Action Trends Alternative, rural lands would take the greatest share of population growth at 22.5%. The rural population projection of 15,388 additional persons would require an additional 6,952 dwellings approximately assuming a 2.49 household size and an 87.5% occupancy rate. The rural and resource land area has more than enough opportunities with a build out capacity of 26,719 lots described in Section 4.7.1. The No Action Trends Alternative has no additional rural protection measures, but has the greatest share of rural population growth and therefore the greatest potential to intrude on rural and resource lands identified for protection in the comprehensive plan.

Similar to population, the No Action Trends Alternative would allocate most job growth to the Bellingham UGA though less of a percentage share than the No Action Current Comprehensive Plan Alternative. The No Action Trends Alternative also provides larger shares to Lynden and Ferndale. Most new jobs would be commercial, though industrial jobs are a significant category as well. The job shares and types are similar to the historic shares of jobs that each community has developed. See Table 4.7-21.

Table 4.7-21. No Action Trends Alternative Job Growth Allocation by Sector

Study Area: UGA and Rural	Commercial	Retail	Industrial	Total
Bellingham	13,443	4,559	5,864	23,865
Birch Bay	148	31	22	201
Blaine	838	98	563	1,498
Cherry Point	96	-	587	683
Columbia Valley	20	8	15	43
Everson	126	41	153	320
Ferndale	901	327	1,614	2,842
Lynden	1,100	440	748	2,288
Nooksack	9	19	78	106
Sumas	13	2	133	148
Unincorporated Rural	2,526	319	2,355	5,200
Total	19,220	5,844	12,131	37,194

Source: Berk & Associates and ICF Jones & Stokes

The No Action Trends Alternative generally has enough capacity to meet the projected job growth as shown in Table 4.7-22. All UGAs are oversized for job capacity except for Bellingham and Blaine. UGAs that are oversized will need to be modified to be in balance with the growth allocation, which may include changes to job type (e.g., industrial versus retail which is more land intensive), or changes to UGA boundaries (e.g., reductions). The deficits in employment in Bellingham and Blaine could be offset with a rezone of residential land to employment given the oversupply of residential land described above.

Table 4.7-22. No Action Trends Alternative–Employment Land Capacity Review

Study Area: UGA	2008 Employment ¹	Employment Growth Forecast	Growth Share ² (%)	Employment Land Needed (Acres)	Surplus or (Deficit) Capacity (Acres)
Bellingham	51,153	23,865	64.2	1,663	(312)
Birch Bay	436	201	0.5	0	69
Blaine	2,971	1,498	4.0	205	(115)
Cherry Point	1,182	683	1.8	750	718
Columbia Valley	90	43	0.1	4	47
Everson	638	320	0.9	81	95
Ferndale	5,534	2,842	7.6	405	156
Lynden	4,832	2,288	6.2	306	93

Study Area: UGA	2008 Employment ¹	Employment Growth Forecast	Growth Share ² (%)	Employment Land Needed (Acres)	Surplus or (Deficit) Capacity (Acres)
Nooksack	206	106	0.3	13	18
Sumas	254	148	0.4	32	117

¹ 2008 data may be underestimated likely due to jobs for which ESD was unable to assign a specific location (see Table 4.7-13).

² The rural employment share would be 14.0%. Added to UGA growth shares, the total is approximately 100%.

Sources: Berk & Associates and ICF Jones & Stokes; Whatcom County Planning and Development Services 2009b

Similar to the No Action Current Comprehensive Plan Alternative, the jobs/housing balance countywide under the No Action Trends Alternative would be approximately 1.21, greater than the 2008 ratio of 1.13. Compared to the No Action Current Comprehensive Plan Alternative, the No Action Trends Alternative allocates some additional jobs to a few of the smaller urban communities. However, most of the difference in job shares between the two alternatives is due to greater growth in rural areas at 14% compared to No Action Current Comprehensive Plan Alternative at 8.7. Thus, the shares to other small urban areas are not as large as in Action Alternative Y described further below.

Table 4.7-23 shows the jobs/population ratio for the No Action Trends Alternative. The jobs/population ratio would increase for Bellingham, Blaine, Everson, Ferndale, and Nooksack UGAs as well as rural areas. Other UGAs would have a similar or lower jobs/population ratio.

Table 4.7-23. No Action Trends–Jobs/Population Balance by Urban Growth Area and Rural Study Area

Study Area UGA and Rural Area	Jobs/ Housing Ratio: 2008 ¹ (%)	Additional Growth Ratio (%)	Total Allocation Ratio (%)
Bellingham	63.0	79.5	67.1
Birch Bay	13.9	6.2	11.0
Blaine	53.3	60.4	55.4
Cherry Point	0.0	0.0	0.0
Columbia Valley	3.8	1.2	2.5
Everson	36.7	47.2	39.0
Ferndale	46.4	52.9	48.4
Lynden	47.6	41.5	45.6
Nooksack	16.5	19.1	17.4
Sumas	32.2	28.4	31.1

Study Area UGA and Rural Area	Jobs/ Housing Ratio: 2008 ¹ (%)	Additional Growth Ratio (%)	Total Allocation Ratio (%)
Rural	18.4	33.8	21.6
Total County	44.4	55.1	47.2

¹ Based on 2008 InfoUSA data as summarized in Table 4.7-14.

Source: Washington State Employment Security Department; Berk & Associates and ICF Jones & Stokes

Action Alternative X

Urban Population Growth

Having the same total population as the No Action Trends Alternative (258,448) Action Alternative X assumes a population growth rate of approximately 1.32% between 2008 and 2031. Total population of 258,448 would add 67,448 persons over the present 191,000 population.

Action Alternative X would allocate most population growth to the Bellingham UGA—the greatest of all the alternatives studied. Action Alternative X generally has more than enough residential land capacity to meet the projected growth as shown in Table 4.7-24. All UGAs are oversized for population capacity except for Bellingham and Lynden. UGAs that are oversized will need to be modified to be in balance with the growth allocation, which may include changes to the mix of land uses (e.g., employment versus residential), changes to the mix of densities (e.g., single family versus multifamily), and/or changes to UGA boundaries (e.g., reductions). Undersized UGAs may require increased densities since Action Alternative X presumes that growth will occur in present UGA boundaries. Thus, infill measures are the primary means of adjusting undersized UGAs.

Table 4.7-24. Action Alternative X—Residential Land Capacity Review

Study Area: UGA	2008 Population	Population Growth Forecast	Growth Share ¹ (%)	Residential Land Needed (Acres)	Surplus or (Deficit) Capacity (Acres)
Bellingham	89,284	36,744	54.5	1,601	(307)
Birch Bay	5,290	3,239	4.8	331	438
Blaine ²	5,754	3,319	4.9	0	1,808
Columbia Valley	3,924	1,000	1.5	106	216
Everson	2,395	1,738	2.6	133	76
Ferndale	12,019	7,753	11.5	498	848
Lynden	11,613	7,656	11.4	552	(270)
Nooksack	1,137	1,035	1.5	61	40
Sumas	1,279	707	1.0	54	64

¹ Rural growth share is 6.3%. Added to UGA growth shares, the total is approximately 100%.

² The city has enough capacity to accommodate the growth in its city limits. While mathematically the city limits are "oversupplied" by 32 acres the result is shown as zero here since city limits are automatically included in a UGA.

Sources: Berk & Associates and ICF Jones & Stokes; Whatcom County Planning and Development Services 2009b

Rural Population Growth

With Action Alternative X, rural lands would take the least share of population growth at 6.3%. The rural population projection of 4,257 additional persons would require an additional 1,923 dwellings approximately assuming a 2.49 household size and an 87.5% occupancy rate. The rural and resource land area has more than enough opportunities with a build out capacity of 26,719 lots described in Section 4.7.1. Action Alternative X allocates the smallest share of rural population growth (though total numbers are greater than No Action Current Comprehensive Plan Alternative). Action Alternative X also includes measures to redirect growth to urban areas and protect rural lands, such as larger lot sizes, transfer of development rights, lot consolidation, etc.⁵ Action Alternative X therefore has a lower potential to intrude on resource lands identified for protection in the comprehensive plan than other alternatives. The ability of any one rural land protection program to reduce the development potential of the 26,917 lots is not high. Thus there will need to be a combination of measures. Additionally, Action Alternative X's rural growth share of 6.3% is two-thirds lower than the trend of 22.8%; thus the number of measures to redirect rural growth would be greater and potentially more strict (for example, permit metering). Table 4.7-25 identifies the rural protection measures and their likely effectiveness.

Table 4.7-25. Rural Protection Measure Potential Effectiveness

Measure and Description	Potential Effectiveness	Benefits/Disadvantages
<p>Decreased rural densities</p> <p>This tool would increase the minimum lot size for new plats in rural areas. For example, properties zoned for a minimum of 5-acre lots could be rezoned to 10-acre lots. Fewer homes per acre could be built where the lot size is increased.</p>	<p>If the County eliminated every potential additional parcel in the rural and resource lands through a downzone, there would remain over 18,000 existing lots in the rural and resource lands.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> ▪ Addresses rural character as well as growth by applying a lot size that allows more open space and less density. ▪ Still allows reasonable use of property. <p>Disadvantages:</p> <ul style="list-style-type: none"> ▪ Reduces current development rights to property owners.
<p>Rural lot consolidation</p> <p>Adjacent lots owned by one owner not meeting standard zoning requirements would be required to consolidate to promote development</p>	<p>The number of lots in adjacent ownership has not yet been calculated. It may allow for a portion of the 18,000 existing vacant lots to be consolidated. It may be appropriate for use in combination with decreased</p>	<p>Benefits:</p> <ul style="list-style-type: none"> ▪ Builds on existing code requirement. ▪ Addresses rural character as well as growth by applying a lot size that allows more open

⁵ Although Alternative X is defined as including rural protection measures, the measures can be considered mitigation for any of the alternatives studied in this EIS.

Measure and Description	Potential Effectiveness	Benefits/Disadvantages
<p>that is consistent with rural zones. This could strengthen the existing lot consolidation requirements in Whatcom County Code 20.83.070</p>	<p>rural densities above.</p>	<p>space and less density.</p> <ul style="list-style-type: none"> ▪ Still allows reasonable use of property. <p>Disadvantages:</p> <ul style="list-style-type: none"> ▪ May reduce development potential on legal lots of record.
<p>Transfer of development rights (TDR) Density Transfer Credits</p> <p>A TDR program relocates development potential from one property to another. Buying these rights generally allows the owner of the receiving site to build at a higher density or height than ordinarily permitted by the base zoning. These transactions can be used to help preserve rural and/or resource lands in the sending area.</p> <p>A Density Transfer Credit program uses the same principle, but allows the developer to obtain their density through a purchase of density credits as opposed to actual development rights. The money generated is used for the Purchase of Development Rights program.</p>	<p>Current program is limited in scope.</p> <p>Code calls for TDRs for private applicants for UGA expansions –1 development right per 5 acre expansion.</p> <p>Existing program limitations:</p> <ul style="list-style-type: none"> ▪ Bellingham UGA –currently only UGA receiving area ▪ Lake Whatcom sending area – currently only sending area ▪ Utility extension policy effect – in general cities do not extend services prior to annexation ▪ Old Town neighborhood plan alternative – in exchange for greater height allow developers to purchase credits into the Lake Whatcom watershed fund <p>The current program has been used to transfer density, but a density rights bank and oversight committee has not been created.</p> <p>To become more effective, the expansion of the TDR program would require:</p> <p>Something of value to create a demand: density or height bonuses, expansions of UGAs, etc.</p> <p>Some transaction to trigger their use: development application, UGA comp plan amendment</p> <p>If transaction chosen involves a city as permitting agency, need new interlocal language.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> ▪ Links rural lands protection to making urban areas more attractive for development. ▪ Could expand from existing program. <p>Disadvantages:</p> <ul style="list-style-type: none"> ▪ Requires strong market conditions that do not currently exist. ▪ Requires additional administration costs and interlocal coordination which may take time. <p>Other potential applications:</p> <p>Should cities that want to maintain reduced densities in certain portions of their jurisdictions be able to do that by purchasing TDRs?</p> <p>What about a city that wants to use achieved densities rather than planned densities in determining its population capacity? TDRs?</p> <p>What about a developer who wants to exceed a maximum impervious footprint limit in a sensitive watershed or elsewhere? TDRs?</p>
<p>Purchase of Development Rights (PDR)</p> <p>A PDR program purchases the development rights from a property owner and the property is continued in farming without the development pressure.</p>	<p>The County operates a purchase of development rights program in the agriculture zone and has spent about \$2 million from the Conservation Futures fund since 2004 buying development rights from</p>	<p>Benefits:</p> <ul style="list-style-type: none"> ▪ Direct payment to land owner to maintain resource lands rather than downzone. ▪ Effectively removes development potential from resource lands. ▪ Can be used for high priority

Measure and Description	Potential Effectiveness	Benefits/Disadvantages
	farmers who apply to the program. 84 rights over 5 years. 641 acres. While it has been important, it is a very small program. The cost to purchase remaining development rights in the agricultural and rural study area lands is estimated at \$450,000,000.	resource lands. Disadvantages: <ul style="list-style-type: none"> ▪ High cost ▪ Lack of resources to apply program in a larger fashion. Likely to be used only for highest priority lands.
<p>Rezone of rural land study areas to agricultural lands</p> <p>Rural 5- and 10-acre zones that are most important to maintaining the agricultural sector of the County could be zoned agriculture to protect these lands as being of long-term commercial significance. This would limit land divisions and non-agricultural activities on the properties. Potential options to implement this concept will require further analysis and public review.</p>	<p>Approach is documented in the County's 2007 Study "Whatcom County Rural Land Study: A Collaborative Report Identifying Rural Areas of Agricultural Significance."</p> <p>Affects 21,000 acres.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> ▪ Would add to the "core" agricultural acres of long-term commercial significance. County target is 100,000 acres. ▪ Links to key policy directive of comprehensive plan. ▪ Maintains present use of property. <p>Disadvantages:</p> <ul style="list-style-type: none"> ▪ May reduce development potential for property owner.
<p>Require Agriculture as a Primary Use and Limit Accessory Uses</p> <p>As a "permitted" use, agriculturally zoned parcels can be converted to residential use. There are about 2,000 potential additional dwelling units possible in Agricultural zones. With this tool, a percentage of a property could be required to be maintained in agricultural use and the size and scope of accessory residential or other non-agricultural activities could be limited.</p>	<p>There are currently 2,132 potential additional dwelling units in the agricultural zone. There are an additional 1,766 potential dwelling units in the rural land study areas.</p>	<p>Benefits</p> <ul style="list-style-type: none"> ▪ Limits conflict between agricultural activities and residential uses. ▪ Allows agricultural residences to be established if associated with the agricultural use. ▪ Limits the conversion of Agricultural land to residential estates. <p>Disadvantages</p> <ul style="list-style-type: none"> ▪ May reduce development potential for property owner.
<p>Agricultural mitigation</p> <p>Farmland could be protected similar to the protection of critical areas. Avoidance of prime farmland would be the preferred alternative, with mitigation required for situations where this is not possible.</p>	<p>The potential effectiveness of this option is not known. Mitigation funds could be placed in the Purchase of Development Rights program to further leverage those funds.</p>	<p>Benefits</p> <ul style="list-style-type: none"> ▪ Supports agricultural uses and values and discourages conversion to other uses. ▪ Concept is understood in the context of critical areas protection. <p>Disadvantages</p> <ul style="list-style-type: none"> ▪ Would be a cost to development ▪ Would require staff time to development and implement.

Measure and Description	Potential Effectiveness	Benefits/Disadvantages
<p>Permit Metering or Permit Auctions</p> <p>This would limit the number of dwelling units constructed over the planning period in the rural and resource lands areas. An annual number of building permits could be granted each year based on a system that directs more permits to less sensitive rural lands. Auction proceeds could be used for PDR.</p>	<p>Could be tied to the rural growth allocation, and/or to service limitations, e.g. lack of water.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> ▪ Directly implements rural growth allocation. <p>Disadvantages:</p> <ul style="list-style-type: none"> ▪ Requires further planning and legal study. Limited use in Washington State and typically associated with a service moratorium (e.g., water or sewer). ▪ Would require creation of a new program, carefully researched and applied to avoid loss of reasonable use of property.
<p>Water Well Limitations</p> <p>Water –limitations on use of “exempt wells” as approved source for potable water.</p> <p>Conservation measures for domestic water uses might also be considered – such as limits on house size, lawn size, and fixtures – to help ensure that sufficient water is available to protect endangered fisheries and for agricultural needs.</p>	<p>Could be very effective in limiting rural sprawl, reducing the need for services in rural and agricultural areas, reducing conflicts with agricultural operations, and protecting water and land resources.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> ▪ Protects limited water for priority resource needs such as agriculture; rare and endangered species; and other natural resources. <p>Disadvantages:</p> <ul style="list-style-type: none"> ▪ Well limitations could require much coordination and changes to rules between Department of Ecology, County Health and Planning and Development Services Departments, and others
<p>Tools to reduce impacts on agricultural and rural lands but not reduce overall density</p> <p>Tools to reduce impacts to agricultural and rural lands include clustering, lot reconfiguration, and other development regulations. Clustering places allowed development on a limited portion of the land and reserves a large remainder for agricultural or other conservation uses.</p> <p>Lot reconfiguration is an option that would allow for clustering of development potential from one or more lots into a specified area of less agricultural value on another parcel or parcels.</p> <p>Development regulations could specify things such as maximum setbacks, maximum footprints, land and water conservation requirements, and other options that would lessen</p>	<p>These options may reduce impact at a site, but are not designed to remove development potential from resource (Ag) and rural lands.</p> <p>The County currently requires clustering in the Agricultural Protection Overlay zone, but this tool needs much improvement.</p> <p>Other development regulations could be effective in some degree in protecting resource lands from conversion or conflict with residential uses.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> ▪ Builds on current regulatory strategies. ▪ Does not include rezoning of land. ▪ Leaves landowners with development potential and value. <p>Disadvantages:</p> <ul style="list-style-type: none"> ▪ Does not decrease development potential in rural and Ag zones. ▪ Clustering and lot reconfiguration strategies would need development and implementation support. ▪ Feasibility of some of these strategies is unknown.

Measure and Description	Potential Effectiveness	Benefits/Disadvantages
impacts on resource lands.		

TDR = transfer of development rights; PDR = purchase of development rights

Sources: Whatcom County Council Office March 4, 2009; Whatcom County Planning and Development Services. January 2009a and January 2009b; ICF Jones & Stokes

The transfer of development rights (TDR) and permit metering options would most likely require the most governmental resources to administer the programs. TDR programs would also require interlocal agreements with the cities together with plan and development regulation changes. The success of the TDR program depends on whether there is a market for purchase of the development rights.

A recent January 2009 study by the County concluded that the feasibility of a successful TDR program is low in the near-term since areas in and around the County cities are developing at levels below what is allowed by zoning and since there are as many as 26,000 buildable lots that do not require a TDR program to be developed. The large number of potential development rights also makes it difficult to support the sale of development rights. Given the oversupply of land capacity in most UGAs, it would also be difficult to tie rezoning or increases in UGA boundaries to a TDR program. The County's analysis suggested taking steps to tie all rezoning approvals (based on voluntary applications) in urban and rural areas to a mandatory acceptance of development rights transfer. City coordination that also ties increased density to a TDR program was also suggested (Whatcom County Planning and Development Services 2009b).

A City of Bellingham study also concluded that a transfer of development rights program for the Lake Whatcom Watershed would likely not be successful in the near-term but could be included as one tool for the long term. The report conclusions were (Property Counselors 2009):

1. A Transfer of Development Rights program isn't likely to be successful in the annexation areas given current densities and economic conditions. New plats in the areas around city boundaries are currently being developed at densities lower than the base densities allowed by zoning. These conditions are likely to continue for the foreseeable future, the next 5 to 10 years. The city does have the power to impose base densities as a condition of annexation.
2. One action that the city could take to change these conditions would be to lower the base densities below the level evident in recent subdivisions. While this would create value for additional development rights, it wouldn't necessarily promote goals of increased density in urban areas where infrastructure is available. We do not recommend such a change.
3. While such a program is not a practical tool at his time, the city could still create a program, providing a structure that will be increasingly attractive

over time. As the city approaches its development capacity, there will be increased demand for development rights, and at some point there will be an incentive for developers to purchase those rights.

4. The program is likely to be used initially on an exception basis only. In order to encourage these pioneering efforts, financial terms should be set at favorable levels initially. The effective cost per TDR at the receiving end should not exceed \$3,000.

5. Expansion of the Lake Whatcom Watershed Purchase program could provide a TDR bank as a TDR program becomes more popular.

6. If a TDR program is to be an effective tool in the future, it will be important to identify a demonstration project to provide evidence of the benefits of the program and the mechanics of how it can work. The city should support a demonstration program on a representative site, which offers flexible land use options and very favorable financial terms during the demonstration period.

7. The city could enhance the attractiveness of the program with an amenity contribution to fund public improvements in the receiving area. These improvements wouldn't take the place of developer funded improvements, but would enhance the marketability of any new development.

The County may also consider other measures not listed in the table above including but not limited to implementing transportation and school impact fees for parity between the County and cities (see Section 4.9 of this Draft EIS).

Job Growth

Similar to population, Action Alternative X would allocate most job growth to the Bellingham UGA though less of a share than the No Action Current Comprehensive Plan Alternative. Action Alternative X also provides a larger share to Lynden and Ferndale. Commercial job growth, followed by industrial job growth, will be the larger categories of new jobs. See Table 4.7-26.

Table 4.7-26. Action Alternative X Job Growth Shares by Sector

Study Area: UGA and Rural	Commercial	Retail	Industrial	Total
Bellingham	14,534	4,696	6,621	25,850
Birch Bay	156	32	25	213
Blaine	861	106	635	1,603
Cherry Point	96	1	663	760
Columbia Valley	22	8	17	47

Study Area: UGA and Rural	Commercial	Retail	Industrial	Total
Everson	136	43	172	350
Ferndale	979	336	1,822	3,138
Lynden	1,205	452	845	2,502
Nooksack	14	19	88	121
Sumas	13	2	150	165
Unincorporated Rural	1,203	149	1,094	2,446
Total	19,220	5,844	12,131	37,194

Source: Berk & Associates and CF Jones & Stokes

Action Alternative X has enough capacity to meet the projected job growth as shown in Table 4.7-27. All UGAs are oversized for job capacity except for Bellingham and Blaine. UGAs that are oversized will need to be modified to be in balance with the growth allocation, which may include changes to job type (e.g., industrial versus retail which is more land intensive), or changes to UGA boundaries (e.g., reductions). The deficits in employment in Blaine could be offset with a rezone of residential land to employment given the oversupply of residential land described above. The deficit in Bellingham, together with the deficit of population in the same UGA, means that some rezones to increase densities/intensities would be needed to accomplish the infill objectives of Action Alternative X.

Table 4.7-27. Action Alternative X–Employment Land Capacity Review

Study Area: UGA	2008 Employment ¹	Employment Growth Forecast	Growth Share ² (%)	Employment Land Needed (Acres)	Surplus or (Deficit) Capacity (Acres)
Bellingham	51,153	25,850	69.5	1,817	(466)
Birch Bay	436	213	0.6	0	68
Blaine	2,971	1,603	4.3	221	(131)
Cherry Point	1,182	760	2.0	837	631
Columbia Valley	90	47	0.1	4	47
Everson	638	350	0.9	87	89
Ferndale	5,534	3,138	8.4	444	117
Lynden	4,832	2,502	6.7	339	70
Nooksack	206	121	0.3	15	16
Sumas	254	165	0.4	35	113

¹ 2008 data may be underestimated likely due to jobs for which ESD was unable to assign a specific location (see Table 4.7-13).

² The rural employment share would be 6.6%. Added to UGA growth shares, the total is approximately 100%.

Sources: Berk & Associates and ICF Jones & Stokes; Whatcom County Planning and Development Services 2009b

Similar to the No Action Current Comprehensive Plan Alternative, the jobs/housing balance countywide under Action Alternative X would be approximately 1.2, somewhat greater than the 2008 ratio of 1.13. Compared to the No Action Current Comprehensive Plan Alternative, Action Alternative X allocates more jobs to other UGAs where some of the smaller urban communities may have more opportunity to become independent centers. However, the shares are not as large as in Action Alternative Y described further below.

Table 4.7-28 shows the jobs/population ratio for the Action Alternative X. The jobs/population ratio would increase for the Bellingham UGA and rural areas. Other UGAs would have a similar or lower jobs/population ratio.

Table 4.7-28. Action Alternative X–Jobs/Population Balance by Urban Growth Area and Rural Study Area

Study Area UGA and Rural Area	Jobs/ Housing Ratio: 2008 ¹ (%)	Additional Growth Ratio (%)	Total Allocation Ratio (%)
Bellingham	63.0	70.4	65.1
Birch Bay	13.9	6.6	11.1
Blaine	53.3	48.3	51.5
Cherry Point	0.0	0.0	0.0
Columbia Valley	3.8	4.7	4.0
Everson	36.7	20.2	29.7
Ferndale	46.4	40.5	44.1
Lynden	47.6	32.7	41.7
Nooksack	16.5	11.7	14.2
Sumas	32.2	23.4	29.1
Rural	18.4	57.4	21.1
Total County	44.4	55.1	47.2

¹ Based on 2008 InfoUSA data as summarized in Table 4.7-14.

Source: Washington State Employment Security Department; Berk & Associates and ICF Jones & Stokes

Action Alternative Y

Similar to the No Action Trends Alternative and Action Alternative X, Action Alternative Y assumes a population growth rate of approximately 1.32% between 2008 and 2031. Total population of 258,448 would add 67,448 persons over the present 191,000 population.

Action Alternative Y would allocate about a third of the growth share to the Bellingham UGA—the least of all the alternatives studied. Action Alternative Y generally has more than enough residential land capacity to meet the projected

growth as shown in Table 4.7-29. All UGAs are oversized for population capacity except for Lynden. UGAs that are oversized will need to be modified to be in balance with the growth allocation, which may include changes to the mix of land uses (e.g., employment versus residential), changes to the mix of densities (e.g., single family versus multifamily), and/or changes to UGA boundaries (e.g., reductions). Undersized UGAs, such as Lynden, may require increased densities and/or expansion.

Table 4.7-29. Action Alternative X–Residential Land Capacity Review

Study Area: UGA	2008 Population	Population Growth Forecast	Growth Share ¹ (%)	Residential Land Needed (Acres)	Surplus or (Deficit) Capacity (Acres)
Bellingham	89,284	23,771	35.2	844	450
Birch Bay	5,290	6,017	8.9	648	121
Blaine	5,754	3,720	5.5	11	1,766
Columbia Valley	3,924	2,952	4.4	317	5
Everson	2,395	1,947	2.9	154	55
Ferndale	12,019	8,688	12.9	539	807
Lynden	11,613	8,580	12.7	634	(351)
Nooksack	1,137	1,159	1.7	76	25
Sumas	1,279	793	1.2	111	7

¹ Rural growth share is 14.6%. Added to UGA growth shares, the total is approximately 100%.

Sources: Berk & Associates and ICF Jones & Stokes; Whatcom County Planning and Development Services 2009b

With Action Alternative Y, rural lands would take a moderate share of population growth at 14.6%, less than No Action Trends Alternative but more than the other alternatives. The rural population projection of 9,822 additional persons would require an additional 4,438 dwellings approximately assuming a 2.49 household size and an 87.5% occupancy rate. The rural and resource land area has more than enough opportunities with a build out capacity of 26,719 lots described in Section 4.7.1. Action Alternative Y has a significant share of rural population growth, greater than the No Action Current Comprehensive Plan Alternative and Action Alternative X, but less than the No Action Trends Alternative. Without rural land protection measures, Action Alternative Y has the potential to intrude on resource lands identified for protection in the comprehensive plan. If rural land protection measures were applied in Action Alternative Y, there may be fewer measures required to protect resource lands compared to Action Alternative X since Action Alternative Y's growth allocation is more in line with past trends.

Under Action Alternative Y most job growth would be allocated to the Bellingham UGA though less of a percentage share than the No Action Current Comprehensive Plan Alternative. Action Alternative Y also provides a larger share to Lynden and Ferndale.

Table 4.7-30. Action Alternative Y Job Growth Shares by Sector

Study Area: UGA and Rural	Commercial	Retail	Industrial	Total
Bellingham	12,012	4,440	4,808	21,259
Birch Bay	668	82	627	1,377
Blaine	1,038	119	746	1,903
Cherry Point	-	-	587	587
Columbia Valley	326	40	89	455
Everson	216	27	203	446
Ferndale	1,325	378	1,966	3,670
Lynden	1,553	496	1,178	3,228
Nooksack	129	16	121	265
Sumas	88	11	83	181
Unincorporated Rural	1,864	234	1,724	3,823
Total	19,220	5,844	12,131	37,194

Source: Berk & Associates and ICF Jones & Stokes

Action Alternative Y generally has enough capacity to meet the projected job growth as shown in Table 4.7-31. All UGAs are oversized for job capacity except for Bellingham and Blaine and to a small degree Lynden. The Nooksack UGA appears to be in balance for employment demand/supply. UGAs that are oversized will need to be modified to be in balance with the growth allocation, which may include changes to job type (e.g., industrial versus retail which is more land intensive), or changes to UGA boundaries (e.g., reductions). The deficits in employment in Bellingham, Birch Bay, and Blaine could be offset with a rezone of residential land to employment given the oversupply of residential land described above. The deficit in Lynden, together with the deficit of population in the same UGA means that some rezones to increase densities/intensities could be needed.

Table 4.7-31. Action Alternative Y–Employment Land Capacity Review

Study Area: UGA	2008 Employment ¹	Employment Growth Forecast	Growth Share ² (%)	Employment Land Needed (Acres)	Surplus or (Deficit) Capacity (Acres)
Bellingham	51,153	21,259	57.2	1,461	(110)

Study Area: UGA	2008 Employment ¹	Employment Growth Forecast	Growth Share ² (%)	Employment Land Needed (Acres)	Surplus or (Deficit) Capacity (Acres)
Birch Bay	436	1,377	3.7	77	(16)
Blaine	2,971	1,903	5.1	267	(177)
Cherry Point	1,182	587	1.6	642	826
Columbia Valley	90	455	1.2	40	11
Everson	638	446	1.2	105	71
Ferndale	5,534	3,670	9.9	515	45
Lynden	4,832	3,228	8.7	416	(7)
Nooksack	206	265	0.7	32	0
Sumas	254	181	0.5	39	110

¹ 2008 data may be underestimated likely due to jobs for which ESD was unable to assign a specific location (see Table 4.7-13).

² The rural employment share would be 10.3%. Added to UGA growth shares, the total is approximately 100%.

Sources: Berk & Associates and ICF Jones & Stokes; Whatcom County Planning and Development Services 2009b

Similar to the No Action Current Comprehensive Plan Alternative, the jobs/housing balance countywide under Action Alternative Y would be approximately 1.22, more than the 2008 ratio of 1.13. Compared to all other alternatives, Action Alternative Y allocates more jobs to other smaller urban communities. This allocation could allow some of the smaller urban communities to attract more jobs and diversify the employment to be less dependent on Bellingham; it may also reduce travel to other areas of the County (see Transportation Section 4.7-9).

Table 4.7-32 shows the jobs/population ratio for Action Alternative Y. The jobs/population ratio would increase for Bellingham, Birch Bay, Columbia Valley, and Nooksack UGAs as well as the rural areas. Other UGAs would have a similar or lower jobs/population ratio.

Table 4.7-32. Action Alternative Y–Jobs/Population Balance by Urban Growth Area and Rural Study Area

Study Area UGA and Rural Area	Jobs/ Housing Ratio: 2008 ¹	Additional Growth Ratio	Total Allocation Ratio
Bellingham	63.0%	89.4%	68.5%
Birch Bay	13.9%	22.9%	18.7%
Blaine	53.3%	51.2%	52.5%
Cherry Point	0.0%	0.0%	0.0%
Columbia Valley	3.8%	15.4%	8.8%
Everson	36.7%	22.9%	30.5%
Ferndale	46.4%	42.2%	44.6%
Lynden	47.6%	37.6%	43.3%
Nooksack	16.5%	22.9%	19.7%
Sumas	32.2%	22.9%	28.7%
Rural	18.4%	38.9%	21.4%
Total County	44.4%	55.1%	47.2%

¹ Based on 2008 InfoUSA data as summarized in Table 4.7-14.
Source: Washington State Employment Security Department; Berk & Associates and ICF Jones & Stokes

4.7.3. Mitigation Measures

Incorporated Alternative Features

- Current Whatcom County Comprehensive Plan Introduction and Land Use Chapter text and policies describe consistency with adopted population forecasts, and the focus of densities within UGAs.
- Current Whatcom County Comprehensive Plan Housing Element policies address availability and affordability of housing across the County.
- Economic Development policies support a healthy, diverse economy and improve the County’s competitiveness.
- Action Alternative X includes infill concepts and rural land protection measures.

Applicable Regulations and Commitments

GMA requires that the County be responsible for allocating population growth to the cities and county lands. The County participates with the Growth Management Coordinating Council to discuss and make recommendations on population forecasts and allocations by jurisdiction. The County maintains and updates policies on housing and employment as part of required comprehensive plan updates.

Other Potential Mitigation Measures

- For UGAs that show population capacities below population targets (e.g. all alternatives for Lynden, the No Action Trends Alternative for Columbia Valley, and Action Alternative X for Bellingham), the County in consultation with the appropriate city could:
 - Consider measures to increase the development capacity such as applying incentives (e.g., infill incentives such as density bonuses) and/or upzones (e.g., greater densities)
 - Consider limited UGA expansions where infill measures are not feasible within the Suitability Analysis Area.
 - Reallocating population from undersized communities to oversized communities, within the range of the population allocations of the Draft EIS. This would shift population to UGAs that have existing potential to accommodate population.
- For UGAs that show capacities greater than the population targets, UGA boundaries should be decreased. Areas should be removed that are more costly to provide public services or that have significant concentrations of critical areas or constraints or that are considered lower priorities by the associated cities or communities (see Chapter 3). Alternatively or in combination, a different mix of densities or land uses may also assist the achievement of allocations, provided the densities are still urban in nature and can be served with public services.
- UGAs that are undersupplied with employment capacity should be modified to change the balance of land uses that have different land demand requirements (e.g., industrial versus retail), or to change UGA boundaries (e.g., expansions). Deficits in employment could be offset with a rezone of residential land to employment land if there is an oversupply of residential land in that UGA.
- To avoid an oversupply of employment land that is unused during the 20-year planning period, the County in consultation with cities could reduce the proposed amount of land designated for commercial and industrial employment use to reach a corresponding level of jobs as the employment forecast.
- The County could allocate population and employment as “initial growth allocations.” The County could modify this growth allocation, in consultation with cities, during the 2011 comprehensive plan update process, with a process to reconcile differences and set final allocations for formal adoption. This allows jurisdictions to increase or decrease the allocation that they had initially agreed to accommodate based on new information (e.g., community visioning, infrastructure analysis) that arises from a detailed plan update process.
- The land capacity analysis should be revised upon further review by the County and cities, either of which may offer modifications to the draft method developed

in February 2009. The method allows for variation based on local information for several factors while providing a consistent countywide framework.

- The current land capacity method removes critical areas including, but not limited to, floodways. Because of recent changes in Federal Emergency Management Act (FEMA) regulations (see Water Resources Section 4.3.3 of this Draft EIS), it is possible that development potential will be greatly limited in floodplains. The County and cities are considering whether to modify the land capacity analysis to deduct acres located within the 100-year floodplain when located in unincorporated UGAs.⁶ If the method is changed, the floodplain acre reductions would reduce land capacity surpluses or increase land capacity deficits but does not appear to substantively change the overall results, as shown in Table 4.7-33. The potential change in method may result in Nooksack having a small employment deficit under Action Alternative Y. Land demand/supply balances for Everson and Sumas UGAs may be closer, though there would likely continue to be some small surpluses in residential and employment land supply.

Table 4.7-33. Developable Acres in 100-Year Floodplains in Unincorporated Urban Growth Areas– Additional Potential Land Capacity Reduction

UGA Study Area	Single Family	Multifamily	Mixed	Commercial	Industrial
Bellingham	6.8	0.0	0.0	0.0	2.0
Birch Bay	14.5	0.8	26.0	0.9	0.0
Blaine	21.4	0.0	0.0	0.0	0.0
Cherry Point	0.0	0.0	0.0	0.0	0.0
Columbia Valley	0.0	0.0	0.0	0.0	0.0
Everson	41.3	0.0	0.0	0.0	28.3
Ferndale	57.5	0.0	0.0	1.5	0.0
Lynden	4.0	9.7	0.0	5.7	0.0
Nooksack	20.0	0.0	0.0	0.0	1.0
Sumas	43.4	7.3	0.0	22.2	0.0

Source: Whatcom County Planning and Development Services

- The County could consider if there is an acceptable margin of error regarding land capacity analysis to recognize its use as a predictive planning tool rather than as a precise method. For example, Kitsap County has established a margin of error of 5% and UGA land capacity results within +/-5% of the growth allocation are considered in balance.

⁶ Since some of the cities have developed areas, such as downtowns, in floodplains that have an established development pattern, the potential method reviews only removing floodplain acres from unincorporated UGAs.

- Rural land protection measures, and incentives to make UGAs more attractive (e.g., densities, infrastructure investment) could be applied to direct growth to urban areas.

4.7.4. Significant Unavoidable Adverse Impacts

Population, employment and housing will increase under any of the alternatives reviewed, to different degrees, with the No Action Current Comprehensive Plan Alternative increasing the least and No Action Trends Alternative, Action Alternative X and Action Alternative Y the greatest. Additional population growth will increase the demand for housing. Additional population, housing, and employment growth will result in secondary impacts on the natural and built environment and to the demand for public services, and is addressed in the appropriate sections of this Draft EIS.