



## MEMORANDUM

**DATE:** August 14, 2009  
**TO:** Whatcom County Comprehensive Planning Team  
**FROM:** Kapena Pflum and Brett Sheckler, Berk & Associates  
**RE:** Land Monitoring Proposed Methods

Whatcom County and local jurisdictions are in the process of finalizing a comprehensive Land Capacity Analysis (LCA) as part of a County Comprehensive Plan Update and urban growth area (UGA) boundary review. The LCA process is the first time a uniform methodology for land capacity assessment is being applied across all jurisdictions in the County. This memo outlines a proposal for how the County will continue monitoring land capacity over the planning period and between full LCA updates. It is meant to be a companion piece to the *Whatcom County Land Capacity Analysis: Detailed Methodology* document developed by Berk & Associates in February 2009 and revised by the County for release in August 2009.

The three main topics covered in this memo include:

- 1. Policy Context for Land Monitoring.** An overview of the various GMA-related processes that provide context for the proposed LCA update schedule and annual monitoring tasks.
- 2. Schedule for Land Capacity Analysis Updates.** The initial recommendation is to conduct the LCA and UGA boundary review at least every ten years with publication of a mid-term report every five years addressing trends in population and employment growth, updated demographic projections, and changes in factors that impact LCA estimates. This schedule will allow the County to satisfy Comprehensive Plan and UGA review requirements mandated under the Growth Management Act (GMA).
- 3. Annual Monitoring Tasks.** The LCA process is very data intensive and requires significant contributions from local jurisdictions to provide data on recent residential and commercial development, local plans and policies, and critical areas. The Land Monitoring Methodology recommends annual data collection and reporting tasks that will help facilitate the proposed five-year mid-term report and 10-year UGA review.

### POLICY CONTEXT

There are several policy-related processes and requirements that help inform the proposed LCA update schedule. These processes include the 10-year UGA review and 7-year Comprehensive Plan review required under GMA; the OFM long-term population forecast release schedule; and the Buildable Lands Program 5-year update cycle.

### **10-Year UGA Review**

Each county that designates urban growth areas is required to review the adequacy of UGA boundaries every ten years<sup>1</sup>. As part of this review, a county must determine if there is enough developable land in existing UGAs to accommodate future growth within the succeeding 20-year planning period. A Land Capacity Analysis is a tool that can assist the County in meeting this UGA review requirement every ten years at a minimum.

### **7-Year Comprehensive Plan Review**

Under GMA, counties are required to evaluate and update, where appropriate, comprehensive plan and development regulations every seven years.<sup>2</sup> Whatcom County was required to complete this review in 2004 and will be required to complete another review and update in 2011.

7-Year Review requirements are generally described in RCW 36.70A.130 (1) (a). Two particular topics in the 7-Year Review include: consideration of critical area ordinances, and, an analysis of the population allocated to a city or county from the most recent ten-year population forecast by the Office of Financial Management (RCW 36.70A.130(1) (c)). Both of these review topics have direct links to components of the LCA. Review of critical area ordinances could potentially impact critical area deductions in the LCA affecting land supply, while review of population allocations and forecasts affects the land demand side of the LCA equation. A complete and relatively current assessment of land capacity would be a valuable reference to have available when reviewing new population allocations and forecasts.

The value of having recent LCA results to inform the 7-Year Review is one reason to conduct a countywide LCA more often than just every ten years when UGA boundaries are reviewed.

### **OFM Long-term Population Forecast Release Schedule**

OFM releases updated long-term population forecasts every five years. The last forecasts were released in 2007 and the next forecasts will be released in 2012. The LCA utilizes population forecasts to estimate the long-term demand for developable land. There is a clear benefit to syncing the LCA update schedule with OFM's population forecasts to ensure the most current forecasts and allocations are being used.

### **Buildable Lands Program Update Cycle**

The Buildable Lands Program under GMA requires jurisdictions in the six most populous counties in western Washington (Clark, King, Kitsap, Pierce, Snohomish, and Thurston) to monitor recent development to determine whether they are achieving urban densities sufficient to accommodate long-term projections of residential and employment growth. The methods used and challenges faced in conducting these buildable lands studies are very similar to those Whatcom County encountered with its own LCA.

The Buildable Lands Program is on a five-year update cycle with the latest round of buildable lands studies being completed in 2007. This is the same schedule as OFM's population forecast release schedule. Whatcom County is *not* one of the six counties required to complete a buildable lands

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<sup>1</sup> RCW 36.70A.130(3)

<sup>2</sup> RCW 36.70A.130(4)

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study every five years but Whatcom County can benefit from tracking these studies and taking advantage of lessons learned and methodological advances being utilized in the other counties.

## **PROPOSED LAND CAPACITY ANALYSIS UPDATE SCHEDULE**

Based on the processes and GMA review requirements described in the previous section, it is recommended that Whatcom County complete a full LCA and UGA review every ten years. Between 10-year UGA reviews, the County should publish a mid-term report every five years that addresses the following:

1. Comparisons between recent trends in population and employment growth and adopted projections
2. Updates to OFM long-term population forecasts
3. Recent trends in development activity and demographics and the implications for land capacity factors and estimates
4. Updates to critical areas designations or ordinances

This schedule will allow the County to stay in synch with OFM's long-term population forecast release schedule. The next OFM forecasts will be released in 2012 and 2017, which matches up well with Whatcom County's next UGA review that must be completed by 2017 and the County's next Comprehensive Plan Review slated for 2018.

## **PROPOSED ANNUAL MONITORING TASKS**

Unlike counties participating in the Buildable Lands Program, Whatcom County is not required under GMA to conduct any annual monitoring of land capacity or the effectiveness of land use planning policies. However, there are several annual monitoring and reporting tasks we recommend to help improve the next LCA update and help facilitate a smooth and efficient update process.

The County should coordinate with cities to ensure that the LCA methodology is applied consistently to all urban growth areas and the first step in this process is to implement uniform annual data collection and monitoring procedures. Throughout the annual monitoring process and subsequent LCA updates, it is important that the County and local jurisdictions continue working together to monitor development trends, address challenges, and adjust policies appropriately.

### **Annual Data Collection**

- **Residential Permit and Plat Activity.** Local jurisdictions already submit annual building permit data (unit counts by type – single family, multifamily, other) to OFM to use as inputs in population estimation and forecasting activities. This data collection process should be augmented so that additional information is submitted to the County to support calculation of achieved net densities of new development.

In addition to units, local jurisdictions will need to submit data on net acres of plats by zoning category. It is important that each jurisdiction continues to calculate net acres using the agreed upon common definition of net acreage outlined in the *Whatcom County Land Capacity Analysis: Detailed Methodology* document and handles deductions for infrastructure, rights-of-way, and critical areas in the same way.

- **Commercial and Mixed-Use Activity.** If possible, local jurisdictions should submit data on new commercial and mixed-use building permits. Specifically, the square footage of new commercial developments and net lot acreage can be used to calculate achieved FAR values of recent development. If employment estimates for the new developments can also be included, employment density (jobs per SF of commercial space) can be calculated. Both FAR and employment density calculations provide valuable inputs and reference points for future LCAs.
- **Master Planned or Large Pending Developments.** The status and specifications of large master planned or pending developments should be reported annually. The most important attributes to be tracked for these developments are the number of residential units, square footage of commercial space, net acreage, and estimated employment. Large pending developments can provide valuable reference points for achieved density, FAR, and employment density calculations.
- **Critical Areas Updates.** Local jurisdictions should submit any critical area studies or updates to critical area ordinances to the County annually. These changes will impact the critical area deductions and assumptions for the next LCA.

### **Annual Analysis and Monitoring**

In addition to the annual data collection tasks listed above, the County should work with local jurisdictions monitor trends in development activity and consider amendments to growth projections, UGA boundaries and other LCA factors that may be appropriate. By monitoring these trends and considering their implications annually, the County and local jurisdictions will be much better prepared when compiling the 5-year mid-term report and conducting the 10-year UGA review.

- **Assessment of Achieved Density and FAR Trends.** Changes in achieved residential density and commercial FAR are important to understand when assessing the impact of land use policies and changing development trends. The better trends in achieved density and achieved FAR are measured and understood, the more accurate future LCA estimates of land supply will be.

In cases where there is not enough development activity in a study area to calculate a meaningful achieved density or FAR, rolling three- or five-year averages should be calculated. These rolling averages can easily be folded into the LCA and UGA review process when needed.

- **Assessment of Population and Employment Growth Trends.** The annual reports from cities on development activity can be used to estimate population and employment growth in the urban growth areas. These estimates should be compared with adopted growth projections to identify areas where actual growth trends are diverging significantly from forecasts. If necessary, these data can be used to amend growth projections, UGA planned densities, or UGA boundaries during the next LCA update.