

**WHATCOM COUNTY
PLANNING & DEVELOPMENT
SERVICES**

5280 Northwest Drive
Bellingham, WA 98226

Hal Hart, A.I.C.P.
Director

TO: City of Bellingham and Whatcom County Planning Commissions

FROM: Troy Holbrook, Planning Division Supervisor
Cathy Craver, Planner I

RE: Staff Response to Whatcom County Planning Commission – Land Supply
Analysis Methodology Questions (memo dated 10/21/05)

DATE: November 10, 2005

Whatcom County and City of Bellingham Planning staffs have conducted a joint review of the memo forwarded by the Whatcom County Planning Commission regarding the Land Supply Analysis Methodology. With regards to Steps 5 and 6, the County has developed independent responses below.

RE: Step 5. Subtract all parcels which you assume will not be available for development within your plan's 20-year framework. Assume that a certain percent of vacant, under-utilized, and partially-used lands will always be held out of development.

- The 15% reduction taken in Step 5 of the methodology already accounts for some property owners that will not develop their land during the planning period. This reduction is also taken to recognize that there are no adopted minimum density requirements within the City. The Urban Growth Area does have minimum density requirements, and it is proposed that the City adopt minimum density requirements as well. In the case of the Urban Growth Area, this reduction assuming 15% of the land will not be available for development/redevelopment during the planning period mimics the safety factor's reasoning to account for uncertainties.
- The Jones Engineering survey is five years old...is it still valid given recent market trends?
 - Overall rising property values
 - GP Mill has closed and redevelopment will begin
 - Morris Square proposal
 - Cornwall/Chestnut proposal
 - Boss Tweed property (was recently purchased at \$80/sq. ft., a significant increase from the \$40/sq. ft. two months ago.)

RE: Step 6. Build in a safety factor

- We do not believe that annexation is a valid reason for the safety because large property owners in the Yew Street and James Street/ Bakerview areas have expressed interest in annexation. Because of the "No-Protest" clause of the utility agreements, the high-

assessed value of these properties could initiate annexation, possibly including other properties within the UGA that do not have services.

- The City is capable of monitoring land supply every three to five years. In the Central Puget Sound Growth Management Hearings Board, Consolidated Case No. 95-3-0039, Final Decision and Order, Bremerton, et al. v. Kitsap County, Respondent the Board stated:

“However, the market factor is not the only device available to achieve a supply that is neither too large nor too small. The Act also requires review of UGAS at least every ten years (RCW 36.70A.130(3)); no more than annual reviews of comprehensive plans (RCW 36.70A.130(2)); and even more frequent amendments to the CPPs. Although the size of the UGA should not be increased in a frequent or cavalier manner, counties should consider the option of including a more modest land supply market factor at the beginning of the twenty-year period, and considering adjustments on a three-or five-year cycle.”

“What a county chooses to call such excess land supply does not matter so much as that such factor is explicitly quantified and expressed as a percentage of land beyond the minimum necessary to accommodate the OFM projected growth...” (Washington State Department of Community Trade & Economic Development (CTED), *Issues in Designating Urban Growth Areas-Part 1-Providing Adequate Urban Area Land Supply*, 1992).

Neither of the previous two suggestions from the Growth Management Hearings Board or the CTED guidance manual has not been considered.