

From: darcy@jonesengineers.us
To: [PDS Planning Commission](#)
Cc: [Naoyuki Ishii](#); [Bob Carmichael](#); bryan@jonesengineers.us; [Matt Aamot](#); [Aucutt, Gregory R.](#)
Subject: Comments for Planning Commission 10-28-21 Draft Whatcom County Review and Evaluation Program Methodology
Date: Thursday, October 28, 2021 3:01:12 PM
Attachments: [BLR PC 10-28-21.pdf](#)

Whatcom County Planning Commissioners - Please kindly accept our comments associated with the "Draft Whatcom County Review and Evaluation Program Methodology" discussed at the meeting tonight. I am submitting these comments on behalf of Caitac, USA Corp. I will be in attendance at the virtual meeting and I am happy to address any questions you may have. I would also like to present oral comments on this item.

Best Regards,

Darcy Jones
Jones Engineers, Inc.



October 28, 2021

Whatcom County Planning Commission
311 Grand Avenue
Suite 105
Bellingham, Washington
98226

Whatcom County Planning and
Development Services
5280 Northwest Avenue
Bellingham, Washington
98226

RE: Draft Whatcom County Review and Evaluation Program Methodology

Dear Commissioners:

We have reviewed the “Draft Whatcom County Review and Evaluation Program Methodology” dated October 8, 2021 and offer the following initial comments on behalf of Caitac, USA.

The document describes the proposed methodology for Whatcom County jurisdictions to use for assessing their relative performance in providing housing choices as established in their respective Comprehensive Plans and the County Wide Planning Policies.

The October 8 report and the memorandum prepared by the County Planning and Development Services staff dated October 29, 2021 both identify RCW 36.70A.215 as the governing legislation.

It is important to recognize that the RCW requires the methodology consider the “Assumptions, Targets and Objectives” as well as anticipated “Development Patterns” for housing as established in the respective plans. RCW 36.70A.215(1)(a) expressly requires in part that the program:

- (a) Determine whether a county and its cities are achieving urban densities within urban growth areas by comparing growth and development assumptions, targets, and objectives contained in the countywide planning policies and the county and city comprehensive plans with actual growth and development that has occurred in the county and its cities;

This reference to “city development assumptions, targets, and objectives” in city comprehensive plans is not limited to formal plan “policies.” It requires evaluation based on the underlying assumptions, targets, and objectives in the city comprehensive plan which guided the determinations of how the city’s housing goals would be achieved.

City of Bellingham

The City of Bellingham Comprehensive Plan emphasizes the need to achieve a balance between single-family and multi-family housing choices. RCW 36.70A.215 requires that this important objective be analyzed at this time.

Chapter 4 (Housing Chapter) of the City of Bellingham Comprehensive Plan states (at the time), the existing city housing stock consisted of 44% multi-family. It states the projected mix for the end of the planning period would be 51% multi-family and 49% single family housing. It



is stated that this projection is based on the existing zoning and the Land Capacity Analysis (LCA), and this projected mix is consistent with the City's growth strategy.

In order to achieve this desired housing mix, the LCA calculations project that going forward new housing would be 65.6% multi-family and 34.4% single family. The LCA provides the detailed calculations to determine just how much developable land is needed to achieve the housing goals, and whether or not the City has the available land capacity.

According to the City's "Development Dashboard" recently posted on the City's website the projected 51%-49% housing mix has already been achieved. **However, according to this data source the current pipeline of ongoing construction and pending projects provides approximately 84% multi-family and 16% single family homes to be built over the next several years.**

These statistics create a concern that the City is not on track to achieve its housing goals as stated in its comprehensive plan.

Section 4.1 of the October 8 report establishes the steps in evaluating achieved densities and land capacity using the "Data Reporting Tools" and "Suitable Lands Tools". It is not clear if and how these tools include a mechanism for measuring the City's housing targets, objectives and development patterns, such as providing a variety of housing choices. This required assessment does not appear to be part of the current methodology.

Perhaps staff can provide examples or an explanation of how the methodology and resulting report will directly address the following questions:

Has the City of Bellingham achieved its targets and objectives with regard to providing a variety of housing choices as stated in the City Comprehensive Plan?

Does the City of Bellingham currently have enough available land to accommodate an adequate supply of single-family homes to meet the targets and objectives for providing a variety of housing choices?

Does the City of Bellingham have capital facilities plans in place or ongoing which will support the achievement of the housing and employment lands goals as stated in their Comprehensive Plan?

We sincerely appreciate the opportunity to review and comment on the "Draft Whatcom County Review and Evaluation Program Methodology" and we look forward to working with you on these issues.

Thank you for your consideration,

Best Regards,



Darcy Jones, PLS, AICP, LEED-ND
Jones Engineers, Inc.

