

Bellingham Comprehensive Plan Land Use Chapter

2016



Photo by Kenni Merritt

I. Introduction

The Land Use Chapter guides the future use of land in Bellingham, ensuring the City's high quality of life is retained and enhanced as the community grows and changes. The requirement for a Land Use Chapter in the Comprehensive Plan is one of the key components of the Growth Management Act (GMA). The GMA requires cities to show how they will be able to accommodate 20 years of growth through sufficient buildable land that is zoned appropriately. This chapter is also consistent with the Whatcom County Countywide Planning Policies, considers planning approaches that increase physical activity, and includes airport compatibility policies, among other requirements.

The purpose of this chapter is to provide a framework for improving the health and livability of the community by accommodating carefully planned levels of development that:

- Promote the efficient use of land through a system of mixed-use urban villages and corridors and compatible infill development;
- Create safe and healthy neighborhoods with access to recreational opportunities, housing options affordable to a range of incomes and a variety of transportation choices;
- Foster a vibrant economy and living wage jobs;
- Maintain Bellingham's sense of place by protecting and enhancing the character of existing neighborhoods, the natural environment and important historic and cultural resources; and
- Build a community that is resilient to adverse events, including natural disasters and climate change.

Bellingham accommodates growth primarily through compact development within the City limits, including infill development in areas served existing infrastructure and services and mixed-use urban villages (or "centers") that are connected by vibrant transit corridors (see Supporting Information section). While higher-intensity development occurs in urban villages, the character of established single-family residential neighborhoods will continue to be preserved and enhanced. Vibrant centers of activity make it easier to walk, bike and use transit for daily needs; reduce greenhouse gas emissions; contribute to a sense of community; provide economic benefits; reduce the need for expansion of the City's urban growth area (UGA); and protect open space and agricultural land.



The corner of Holly and Bay Streets in downtown is lively on sunny days. Photo by Philip Humphries.

These concepts are further defined under the following seven categories, which form the organizational basis for the goals and policies of this chapter:

- Residential Development**
- Urban Villages and Transit Corridors**
- Commercial and Industrial Development**
- Public and Institutional Development**
- Urban Growth Area and Annexation**

**Public Participation
Sustainable Land Use**

The chapter's 10 goals mirror the City's Legacies and Strategic Commitments and emphasize the interdependence of the environment, economy and society:

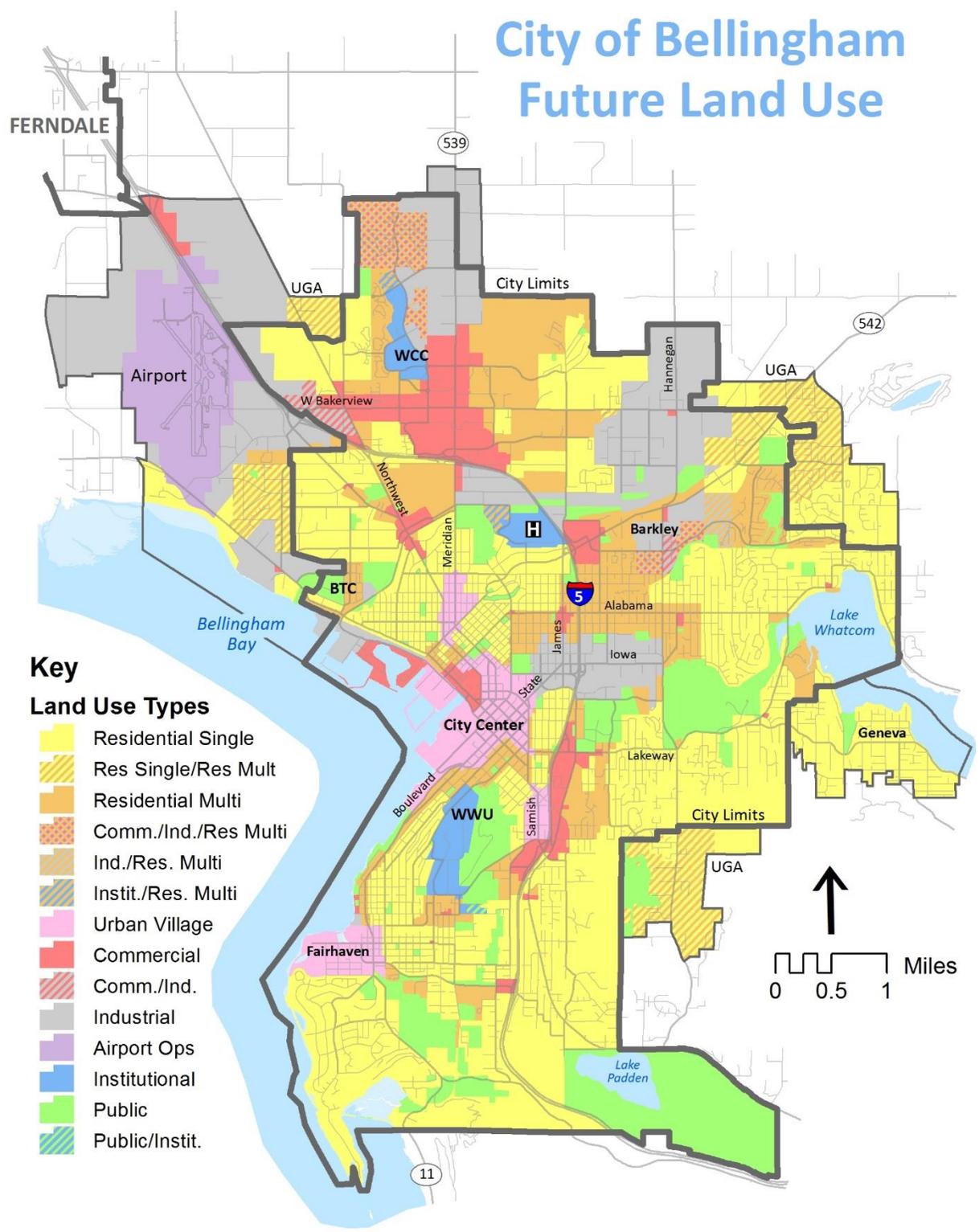
- GOAL LU-1 Support sense of place in neighborhoods.**
- GOAL LU-2 Foster vibrant urban villages.**
- GOAL LU-3 Support a thriving local economy across all employment sectors.**
- GOAL LU-4 Maintain and enhance publicly-owned assets and institutional uses.**
- GOAL LU-5 Support the Growth Management Act's goal to encourage growth in urban areas.**
- GOAL LU-6 Use transparent processes and involve stakeholders in decisions.**
- GOAL LU-7 Protect and restore our community's natural resources (land, water and air) through proactive environmental stewardship.**
- GOAL LU-8 Protect and improve Lake Whatcom and its watershed to ensure a long-term, sustainable supply of water.**
- GOAL LU-9 Preserve historic and cultural resources.**
- GOAL LU-10 Foster community connectedness to improve the health of residents.**

II. Land Use Designations

Land uses within Bellingham are governed by the designations contained in the City's 25 neighborhood plans; zoning designations and development regulations in the Land Use and Development Code; and other design, development and environmental regulations. The City's seven general land use categories and acreages are shown on the Future Land Use Map and Land Use Categories table:

- Single-family Residential
- Multi-family Residential
- Commercial
- Industrial
- Urban Village
- Institutional
- Public

The City's land use categories are further defined in the following Goals and Policies section.



III. Goals and Policies

Residential Development

Over half of the City's total land area zoned residential, making it the dominant land use in Bellingham in terms of total acreage. Residential development is also encouraged in the City's commercial and urban village zones. Bellingham had approximately 37,825 dwelling units in 2015, the majority of which were single-family homes. During this same year, developed residential areas of the City contained an average density of 6.5 units per acre.

Zoning	Acres	Percent
Residential Single	9,719	42.3%
Residential Multi	3,263	14.2%
Commercial	1,275	5.5%
Industrial	3,908	17.0%
Urban Village	865	3.8%
Institutional	418	1.8%
Airport Ops	1,024	4.5%
Public *	2,517	10.9%
Total Acres	22,989	100.0%

** Note: Some lands in public use are in zones designated for residential, commercial, and other uses.*

GOAL LU-1 Support sense of place in neighborhoods.

Policy LU-1 The Single-Family Residential designation permits a range of housing densities to achieve the City's housing diversity and affordability goals. In undeveloped or infill areas, new housing may include single-family detached, single-family attached, townhouses, cottage housing, accessory dwelling units, clustered housing and other small-scale housing forms. Accessory, public and semi-public uses are also allowed.

Policy LU-2 The Multi-Family Residential designation is intended for areas that are able to support higher concentrations of people, while encouraging a desirable living environment within and adjacent to these districts. This zoning also provides a compatible mixture of residential housing types, typical accessory uses, public and semi-public uses, office uses and limited neighborhood commercial uses in appropriate areas.

Policy LU-3 Residential densities are permitted as follows:

Residential, Low Density – 7,201 or more square feet per dwelling unit (5 or less units per acre). The Low-Density Residential designation should be used for land that is not suited for more intense urban development because of environmentally-sensitive areas and/or public facility or utility capacity limitations.



Single-family homes in the Columbia Neighborhood. Photo by Aarin Wright.

Residential, Medium Density – 3,600 to 7,200 square feet per dwelling unit (6 to 12 units per acre). The Medium-Density Residential designation should be used for land that is suitable for moderate density development.

Residential, High Density – 0 to 3,599 square feet per dwelling unit (more than 12 units per acre). The high-density residential designation should be used for land near existing or potential high-frequency transit service and/or adjacent to or near employment and commercial areas.



Multi-family units on High Street.

Policy LU-4 Protect the unique character and qualities of existing neighborhoods, while identifying opportunities for improved livability, safety, and housing affordability and diversity.

Policy LU-5 Foster neighborhoods with a balanced mix of housing prices that are compatible with the wages and incomes in the community.

Policy LU-6 Support higher-density development with parks, art, schools and other public amenities.

Policy LU-7 Periodically review and update the City's residential zoning regulations and design standards to promote quality development that considers and complements existing neighborhoods.

Policy LU-8 Work with the community's institutions of higher education to develop a comprehensive strategy addressing issues associated with off-campus student housing. Potential measures include:

- Build relationships with large student housing providers to provide adequate off-campus housing that it is high quality and complementary with its surroundings;
- Provide education to landlords of student housing located in older homes regarding the City's historic preservation program and ways in which to economically improve older properties;
- Expand residential parking zones to lessen the impacts of overflow student parking in established single-family neighborhoods; and
- Enforce the City's Rental Registration and Safety Inspection Program.

Residential parking zones (RPZs) help ease parking congestion in residential neighborhoods, while balancing the needs of all people who use public streets. RPZs help neighborhoods deal with impacts through transportation and parking demand management strategies (see Transportation Chapter).

Policy LU-9 Promote small-scale commercial uses (e.g. corner stores) within neighborhoods, particularly where these uses historically existed, to encourage walkability and provide opportunities for employment and placemaking.

Placemaking: *People interacting with one another builds stronger, healthier communities. To make a place great, it should include these qualities: sociability, uses & activities, access & linkages, and comfort & image.*

Policy LU-10 To achieve a healthy mix of housing that is affordable to a wide range of incomes, implement and seek new, innovative tools, including, but not limited to:

- Density bonuses;
- Inclusionary zoning;
- Cluster subdivisions that preserve open space, retain natural features and provide other public benefits;
- The Infill Housing Toolkit, which includes small lot homes, townhomes and other housing forms;
- Accessory dwelling units;
- Adaptive reuse of existing buildings;
- Purchase and transfer of development rights (TDR) programs; and
- Public-private partnerships for shared parking facilities, wetland mitigation, and regional stormwater management.



Bellingham Cohousing's condominium homes are privately owned and include features one would expect in a typical residence.

Policy LU-11 As neighborhood plans are developed and updated, important priorities and issues should be identified, including:

- A mix of housing types for all income levels, ages and abilities;
- References to the appropriate adopted plans for parks, bicycle, pedestrian, and transit infrastructure;
- Significant historical, archaeological and cultural resources;
- Walkable and accessible neighborhood schools;
- Significant public vistas and view corridors;
- Placemaking and streetscape amenity opportunities, including public art, street furniture, green infrastructure projects (e.g. street trees and rain gardens), and pedestrian-scale lighting;
- Potential Crime Prevention Through Environmental Design (CPTED) improvements;
- Protection of critical areas and other environmentally-sensitive areas;

Crime prevention through environmental design is a multi-disciplinary approach to deterring criminal behavior through environmental design. CPTED strategies rely on the ability to influence offender decisions that precede criminal acts.

- Spaces for small-scale community gardens, healthy mobile food vendors, and other opportunities for healthy, local food; and
- Potential considerations for areas susceptible to natural disasters and climate change impacts (see [Whatcom County Natural Hazards Mitigation Plan](#)).

Urban Villages and Transit Corridors

The City's urban villages, which are planned to accommodate much of the City's higher-density mixed-use development, are key to preserving neighborhood character while taking advantage of existing infrastructure. Since adoption of the 2006 Comprehensive Plan, master plans, design standards, and regulations have been developed for six urban villages - the Downtown, Waterfront, Fairhaven, Fountain, Samish Way, and Old Town Districts (see Bellingham Existing and Proposed Urban Villages map). These villages are part of a larger "centers and corridors" planning approach that links mixed-use centers of activity through vibrant, high-frequency transit corridors. As implementation of the urban village plans progresses, planning work can begin on the transit corridors that connect them to each other and the surrounding community (see Transportation Chapter).

Urban villages are activity centers that provide pleasant living, shopping and working environments; strong pedestrian accessibility; adequate, well-located public spaces; a connected street system; and a balance of retail, office, and residential uses.

A formal urban village plan has not been adopted for the Barkley District, which functions as an urban village in many ways and is identified as an urban development center in the Barkley Neighborhood Plan. Other potential areas for urban village planning include the James Street, Cordata, Lakeway/Lincoln, and Birchwood/Northwest/Maplewood areas. If the existing planned urban villages continue to succeed and the need for additional centers arises, these areas would be evaluated for potential master planning processes. It's important to note that the designation of an area as an urban village does not preclude the development of mixed-use buildings on a smaller scale elsewhere throughout the community.

A recent review of the success of urban villages indicates mixed results. The Downtown, Fairhaven and Barkley Districts have seen significant development, but others have had limited development activity. Growth has been uneven due to a variety of factors, including availability of land, environmental cleanup requirements, private landowner interest and motivation, economic health, desirability of an area, and development risk. Many of the urban villages were planned during the Recession; thus, they will require time and a healthy economy to attract and leverage new investment and evolve into vibrant centers. A few additional observations include:



The Barkley Urban Village provides living, shopping, employment and recreational opportunities.

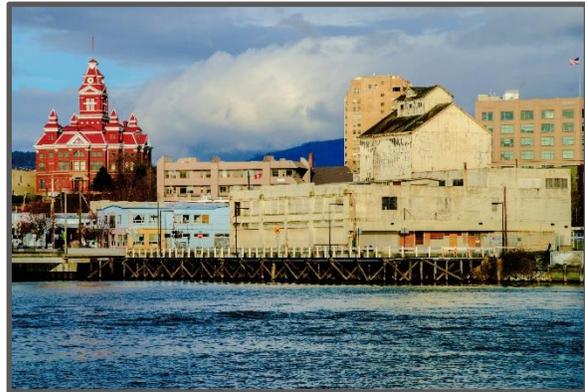
- 1. Incentives can be very effective, but need to be applied in a targeted manner.** The judicious use of incentives can help "jumpstart" development in urban villages. This is evident in the significant increase in housing downtown through the use of incentives such as the multi-family tax exemption program, which has incentivized development of over 600 housing units,

with over 200 more under construction or in building permit review. However, in slow-starting urban centers, incentives alone have not overcome the risks associated with establishing new mixed-use development. It is likely that catalytic "pioneer" projects will be required to establish developer confidence. These types of projects cannot be anticipated in a predictable manner and will likely require location-specific incentives to encourage more timely development.

Spreading incentives too broadly can be counterproductive and will stretch limited City resources. Targeted use of major incentives has resulted in better outcomes than applying them across a broader area, which can dilute their effectiveness.

2. City commitment and public amenities are important. The City's commitment to improving infrastructure and amenities in urban villages can be just as, if not more, effective at attracting development to these areas than direct financial incentives. Just shy of a decade after adoption of the urban village concept, the development community is starting to take a real interest in these areas. The City's focus on the downtown for the past two decades is paying off, with 660 new housing units and 25,000 square feet of new commercial development since 2006. Whenever possible, the City should look for opportunities to leverage expenditures in public amenities and infrastructure with private investment when they are likely to have a multiplier effect, especially for early development in new urban villages.

3. Inherent economies of scale and effort can be beneficial. Larger, multi-project development proposals in urban villages that are under common management/ownership (i.e. Barkley Village and the Waterfront District) provide a unique opportunity for the City to work with proponents to provide predictable growth and more efficient infrastructure.



The waterfront and downtown from Bellingham Bay. The Waterfront District Subarea Plan was approved in 2013. Photo by Kenni Merritt.

GOAL LU-2 Foster vibrant urban villages.

Policy LU-12 The Urban Village designation encourages the creation of intensely-developed mixed-use areas where infrastructure, transit, and other public facilities and services are available or can easily be provided. Urban villages should provide significant job opportunities and a substantial amount of new housing, allowing people to work, shop and recreate near where they live. The ultimate mix of land uses, densities, infrastructure requirements and other typical zoning, design, and development standards should be established in a master plan.

Policy LU-13 Promote and facilitate continued development of the City's seven existing urban villages - Downtown, Waterfront, Fairhaven, Fountain, Samish Way, Old Town and Barkley. These areas are expected to accommodate significant residential and mixed use development over the 20-year planning period (see urban village master plans, design standards, and regulations).

Policy LU-14 Ensure that Bellingham's City Center (i.e. Downtown, Waterfront and Old Town Districts) retains its role as the dominant cultural, civic, financial and service center for the community and region. This area should be unique, attractive, and reflect Bellingham's history and natural setting (see Downtown Bellingham Plan, Waterfront Master Plan, Old Town Subarea Plan, City Center Neighborhood Plan and City Center Implementation Strategy).



Digester tanks on the waterfront are proposed to be incorporated into the area's redevelopment. Photo by Aarin Wright.

Policy LU-15 Continue effective incentives and develop new incentives where needed for the planned urban villages. These incentives should be targeted to areas where they have proven to be successful and/or where the greatest need has been identified. Incentives should be flexible to respond to opportunities and changing markets.

Policy LU-16 Establish benchmarks and annual monitoring of key indicators for urban villages to assess the effectiveness of incentives and implementation progress.

Policy LU-17 In instances where a proponent controls multiple properties within an existing urban village and seeks to address the coordinated provision of infrastructure, cooperatively develop plans, approaches and agreements, including development agreements.

Policy LU-18 Develop new plans and update existing plans as needed to reflect the unique nature of each urban village. The plans should consider the elements identified in Policy LU-11, as well as the following:

- Land uses and adaptive performance-based development standards to encourage compatible new development and greater flexibility in design, particularly when the development context is well defined;
- An appropriate mix of commercial, office and residential uses;
- Parking requirements, including the potential for parking maximums and/or reduced parking requirements, and design standards that support multi-modal transportation options; and



Pedestrian walkway in Fairhaven Urban Village. Photo by Caitlin Forslof.

- Sustainable development practices and the use of the Leadership in Energy and Environmental Design for Neighborhood Development (LEED-ND) rating system, or similar system, to measure the potential sustainability outcomes of the proposed plans.

***Sustainable development** is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.
– Brundtland Report*

Policy LU-19 Consider developing integrated transportation-land use plans along Whatcom Transportation Authority's (WTA) GO Lines connecting urban villages where appropriate. The planning process should consider the following (see Transportation Chapter):

- A mix of land uses and higher densities within each corridor, resulting in transit-oriented development;
- Design standards that support the multi-modal nature of the corridors;
- Efforts to increase the effectiveness of public transportation along the corridors; and
- The elements identified in Policies LU-11 and LU-18.

***A Transit-oriented development (TOD)** is a mixed-use residential and commercial area designed to maximize access to public transportation, and often incorporates features to encourage transit ridership.*



Commercial and Industrial Development

The Greater Bellingham Area is home to about 64% of the total employment in Whatcom County. In 2013, the City had over 3.2 million square feet of office space and over 8.2 million square feet of retail space. Large commercial and office uses are concentrated in a few areas of the City, including the Downtown District and the Meridian, Cordata, Barkley, and Fairhaven neighborhoods. Smaller commercial and office centers are located at Sehome Village, Sunset Square, the Lakeway/I-5 interchange area, the Fountain District, and along the Northwest Road and Samish Way corridors.

Approximately 26% of the City's total acreage is zoned for commercial and industrial development – 5.5% for commercial uses, 17% for industrial uses, and 3.8% in urban village zones. Many existing zoning categories allow a mix of uses (e.g. commercial uses are allowed in many of the City's industrial zones).

Marine and heavy industrial uses are primarily located on the Bellingham waterfront and in Fairhaven. Light industrial uses are concentrated along the State/James Street, Ohio Street, Iowa Street and Hannegan/Bakerview Road corridors.

See the City's Economic Development Chapter for information on the City's role in economic development activities and additional goals and policies related to economic development. The Economic Development Strategic Action Plan includes strategies to achieve the goals of the Economic Development Chapter.

GOAL LU-3 Support a thriving local economy across all employment sectors.

Policy LU-20 The Commercial designation includes a range of commercial development intensities, from small neighborhood commercial areas to large planned commercial areas. In general, commercial areas should provide a broad range of services, commercial uses, mixed commercial and residential uses, and personal service establishments. Many existing commercial zoning categories allow and encourage mixed-use development, particularly in urban centers.



James Street includes a mixture of Commercial and Industrial zoning.

Policy LU-21 The Industrial category comprises a range of potential uses, including "light" industrial uses (e.g. research and development and water-related industrial uses) and "heavy" industrial uses (e.g. intensive warehousing, manufacturing, fabrication, assembly, and distribution of goods). Commercial uses are allowed in some industrial zones. Industrial designations and zoning are appropriate for areas with large parcels or a number of small parcels.

Policy LU-22 Avoid auto-oriented strip commercial development. Where such areas already exist, prohibit linear expansion and encourage redevelopment into more compact, mixed-use nodes of activity, especially along WTA transit routes.

Policy LU-23 Regularly review and update the City's commercial zoning regulations (e.g. text and associated maps), design standards, and design review process as needed to allow design flexibility and creativity, address emerging issues, and foster compatibility of development with the character of surrounding areas.

Policy LU-24 Encourage the inclusion of context-sensitive elements in the design, maintenance, and update of new and existing mixed-use, industrial and commercial sites (e.g. lighting, signs and landscaping) and buildings (e.g. scale and height).

Context-sensitive design (CSD) refers to development practices and roadway standards that are flexible and sensitive to community values. CSD allows design decisions to better balance economic, social and environmental objectives.

Policy LU-25 Protect adjacent properties and public areas by allowing only non-glare shielded lighting at an intensity level no higher than necessary to meet safety standards.

Policy LU-26 Industrial zoned land in the UGA should be reserved for industrial uses and appropriate accessory uses.

Policy LU-27 Allow nonprofit homeless shelters outright in Industrial zones and conditionally in Commercial zones.

Policy LU-28 Consider social equity and health issues in siting such uses as manufacturing and essential public facilities (EPFs) to limit exposure to harmful substances and environments.



Transition Bikes moved its office and warehouse to Bellingham in 2015.

Policy LU-29 Separate heavy industrial uses from incompatible land uses. Use transition zoning, buffers, and other techniques to protect industrial areas and nearby uses from conflicts.

Policy LU-30 Encourage live/work units in appropriate transitional zones, including light industrial zones. Develop appropriate locational criteria and design/development standards so that they are compatible with surrounding industrial uses.

Public and Institutional Development

Public and quasi-public land uses include schools, government offices, churches, and public recreation such as golf courses. Approximately 2,500 acres of land in the City are devoted to public

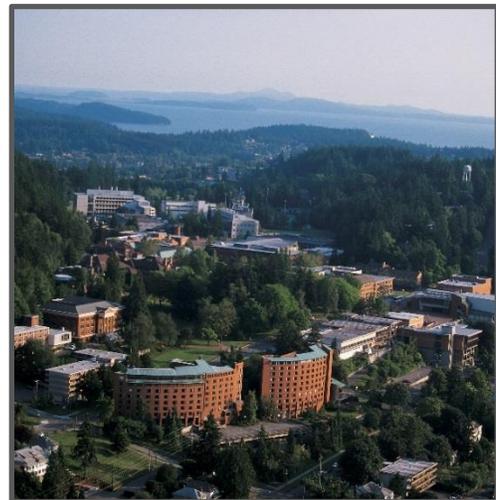
uses (11% of the total City acreage), while approximately 418 acres are designated for institutional uses (1.8% of the total City acreage).

Each county and city planning under the GMA (RCW 36.70A.040) must include a process for identifying and siting essential public facilities. EPFs include those facilities that are typically difficult to site such as airports, state educational facilities, state or regional transportation facilities, state and local correctional facilities, solid waste handling facilities, and in-patient facilities. The Bellingham Municipal Code (BMC) includes the process and criteria that the City uses when identifying EPFs.

GOAL LU-4 Maintain and enhance publicly-owned assets and institutional uses.

Policy LU-31 The Public designation is applied to major parcels of land that are owned or leased by public agencies such as city, county and state governments and the Bellingham School District. Certain public uses may be located in other zoning districts as designated in the BMC. Public zoning is used for a range of uses, including parks, recreational facilities, trails, open space, schools, utilities, and other local governmental facilities.

Policy LU-32 The Institutional designation is appropriate for areas containing public or quasi-public institutional uses requiring large land area. Bellingham is home to several large “institutional” public or quasi-public campus-type developments such as Western Washington University (WWU), Whatcom Community College (WCC) and St. Joseph’s Hospital.



The Western Washington University campus includes an Institutional designation. Photo courtesy of WWU Publishing Services.

Policy LU-33 Provide adequate public facilities, including schools, libraries, parks, trails, police and fire services, and transportation and utility infrastructure. Ensure that these facilities are compatible with the City's adopted Future Land Use Map.

Policy LU-34 Set a high standard of design quality for public buildings so that they positively contribute to the community.

Policy LU-35 Promote equitable delivery of, and access to, human services by allowing these uses in suitable locations and encouraging their creation through incentives and other innovative measures.

Human services include childcare, food assistance, medical and dental care, counseling, and transitional shelter.

Policy LU-36 Foster access to quality health and childcare through programs that are compatible with households' economic resources and supported by public and private resources.

Policy LU-37 Ensure that police and fire department staff are highly trained so that they contribute to an ongoing sense of security and safety in the community.

Policy LU-38 Maximize the contributions of the City's educational facilities (primary through higher education). Coordinate with Bellingham School District leadership to assess the impacts of ongoing programs and determine if the location of future facilities is consistent with the goals of the community.

***Infill development** is defined as new development on vacant or underutilized land in existing urban areas that are already largely developed. Directing growth to areas served by existing infrastructure is an efficient use of land and can help achieve community goals such as transit-oriented development and open space protection. Design guidelines are in place for the City's urban villages and multi-family projects.*

Policy LU-39 Retain neighborhood schools in developed areas and locate new schools consistent with the City's commitment to encourage infill development, walkability, and compact growth.

Policy LU-40 Incorporate physical health and well-being into the location, design and operation of public facilities and services by considering the following:

- Sustainable building and development practices, including energy conservation and low impact development (LID) techniques;
- Pedestrian, bicycling and transit access to public facilities;
- Adaptation to natural disasters and climate change impacts;
- Community gardens in accessible public open spaces; and
- Educational and demonstration programs that help foster a healthy environment, physical activity, well-being, and public safety.



The Lightcatcher building, part of the three-building Whatcom Museum complex, includes a green roof. Photo by Jacob Knapp Photography.

Policy LU-41 Maintain a process to site EPFs in the BMC that requires consistency of proposed facilities with the Bellingham Comprehensive Plan; emphasizes public involvement; identifies and minimizes adverse impacts; and promotes the equitable location of these facilities throughout the City, county and state.

Policy LU-42 Discourage incompatible land uses and activities adjacent to the Bellingham International Airport (BIA) to preserve the safety and efficient use of the airport (see BIA Master Plan for more information). Incompatible uses are those that:

- Could be impacted by airplane noise;
- Could create or be impacted by airplane accidents; or

- Create height hazards that could adversely impact aircraft that are taking off or landing.

Policy LU-43 Review and update the BMC as needed for consistency with the BIA Master Plan and applicable airport compatibility regulations.

Urban Growth Area and Annexation

The GMA requires counties to designate urban growth areas that include cities and land outside cities characterized by urban growth or adjacent to areas characterized by urban growth. The UGA boundary is a site-specific line separating the area to be annexed and provided with the full range of urban services from rural areas. The City and the land area within the unincorporated UGA are expected to accommodate urban development and population growth throughout the 20-year planning period (see Section IV for more details on the process to determine the population and employment forecasts and UGA boundaries). Bellingham accommodates growth primarily through compact development within the City limits, including infill development and mixed-use urban villages, thereby limiting the need for UGA boundary expansion (see GOAL LU-2). However, many areas outside the City limits are already developed to urban densities and served by City utilities. These areas have been slow to annex largely due to the absence of commercial development (and its associate revenue) and the cost to the City as a whole to meet adopted level of service standards.

Land uses within Bellingham's unincorporated UGA are governed by the Whatcom County Comprehensive plan, zoning and subdivision ordinances, and other development regulations. City development standards are applied to development in the UGA per an Interlocal Agreement adopted by the City and county. Generally, annexation occurs when property owners in a portion of the UGA submit a petition to the City asking for their land to be annexed. In response to a petition, the City Council determines whether the property should be annexed. Since adoption of the 2006 Comprehensive Plan, the City has approved eight annexation petitions, adding about 1,500 acres of land to the City (about an 8% increase in total City acreage). This land includes 1,334 acres zoned for residential development, mostly single family. The City's Annexation Phasing Plan includes a prioritized list of annexation areas.



This property is part of the recently-annexed Dewey Valley area.

Much of the unincorporated UGA includes existing urban levels of development due to past policies permitting the extension of City utilities prior to annexation, or development served by independent water and sewer districts (e.g. Geneva, Hillsdale, Marine Drive, etc.). The City now requires annexation prior to the extension of water and sewer facilities. These areas are sometimes difficult to annex because of urban infrastructure and service costs, as well as a lack of interest from property owners. Due to the presence of urban levels of development, it is fitting for these areas to become part of the City; thus, the City intends to examine potential methods for offsetting annexation costs.

GOAL LU-5 Support the Growth Management Act's goal to encourage growth in urban areas.

Policy LU-44 Focus higher-intensity land uses in mixed-use urban villages and transit corridors, thereby maximizing use of existing infrastructure and services (See GOAL LU-2).

Policy LU-45 Provide sufficient land area and densities to meet Bellingham's projected needs for housing, employment and public facilities. Plan to accommodate a total population of 124,157 people and 84,788 jobs in the City of Bellingham and its unincorporated UGA by 2036.

Future 20-year population and employment growth can be accommodated within the existing City limits and UGA boundaries without changes to existing zoning.

Policy LU-46 The following factors should be considered when determining the size and location of Bellingham's UGA:

- State and county rules and requirements, including the 20-year population and employment growth forecasts and logical boundaries;
- Service and infrastructure costs;
- Varied and affordable housing needs;
- Industrial and commercial zoning, with an emphasis on living wage jobs;
- City infill development goals;
- Livable neighborhoods;
- Environmentally-sensitive areas;
- Open spaces;
- A safe and efficient arterial street system and pedestrian, bicycle, and transit connections;
- Transfer of development rights receiving zones; and
- Additional City priorities, goals, and policies.

In a TDR program, landowners sell development rights from their land to developers or other interested parties who use the rights to increase development densities at other designated locations.

Policy LU-47 Retain the designation of the South Yew Street property as a UGA Reserve area and add the South Caitac property as a UGA Reserve area (see map of City, UGA, and UGA Reserves).

Policy LU-48 Coordinate with neighboring special purpose districts and general purpose governments on development projects and long-term plans in the City's unincorporated UGA to provide economical service delivery and review potential cumulative impacts.



Policy LU-49 Apply the City's design, development, infrastructure improvement standards, and environmental regulations in the City's unincorporated UGA.

Policy LU-50 In cooperation with Whatcom County and other appropriate agencies, update the Urban Fringe Subarea Plan and City/County Interlocal Agreement governing annexations and development in Bellingham's unincorporated UGA. These documents establish development rules for the orderly and compatible transition from rural to urban uses.

Policy LU-51 Develop innovative means of transitioning previously-developed unincorporated UGA areas to the City (e.g. local improvement districts or capital facilities funding districts) and determine priority areas for potential annexation.



Homes in the Northern Heights neighborhood are located in the northeast Bellingham UGA.

Policy LU-52 Update the City's Annexation Phasing Plan. In previously-developed annexation areas, phased level of service standards may be considered.

Policy LU-53 Annexations should be considered if they:

- Enhance, improve, or maintain the quality of life for Bellingham's residents, businesses and property owners;
- Consider the anticipated costs (e.g. infrastructure and urban services) and revenues associated with future development in the subject annexation area;
- Improve land use compatibility, promote orderly development, and include multi-modal transportation options; and
- Help mitigate issues associated with prior adverse development patterns.

Policy LU-54 Encourage and support annexations of land in Bellingham's unincorporated UGA consistent with the City's ability to provide urban facilities and services such as police, fire, water, and sewer.

Policy LU-55 Prohibit the extension of utilities prior to annexation unless the exceptions outlined in the BMC are met.

Policy LU-56 Allow new urban development only where the full range of urban facilities and services exists or can be provided.

Policy LU-57 Coordinate with Whatcom County and other appropriate agencies to review and update existing strategies (e.g. TDRs) and develop new tools to discourage development in rural areas outside cities and unincorporated UGAs.

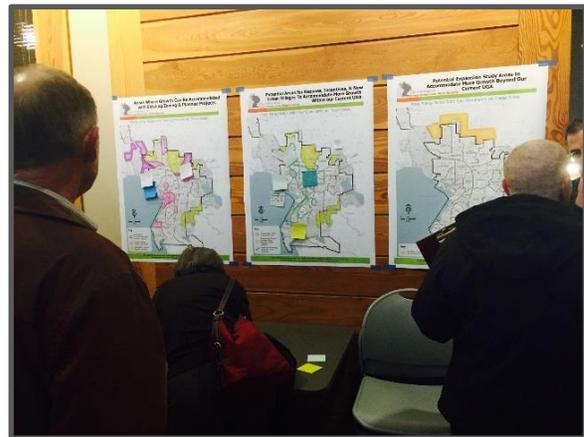
Policy LU-58 Work with the county on a regional growth strategy that preserves land outside the unincorporated UGA for long-term agricultural use, recreation, open space, and other uses consistent with rural character.

- Policy LU-59** Maintain an open space corridor between the Ferndale and Bellingham UGAs. This corridor should include lands useful for recreation, wildlife habitat, trails, and/or connection of critical areas (See Parks, Recreation and Open Space Plan for Open Space Map).
- Policy LU-60** Encourage the assembly and redevelopment of key underdeveloped parcels through incentives and public/private partnerships.
- Policy LU-61** Continue using the land supply monitoring program to assess the adequacy and serviceability of the developable land supply for residential, commercial and industrial land uses.
- Policy LU-62** Evaluate all rezone proposals for potential impacts on the available supply of residential, commercial and industrial zoned land.

Public Participation

Planning for the 2006 Comprehensive Plan included an extensive public involvement process with dozens of public meetings, open houses in the unincorporated UGA, meetings with neighborhood groups, hearings on the environmental impact statement (EIS), and Planning Commission and City Council hearings and study sessions. One of the highlights of this process was the 2004 community forum on growth management, which engaged over 1,000 citizens to develop the vision, goals and policies for Bellingham's future growth and development. The 2016 update is not an overhaul of the 2006 plan; rather, it builds on the thoroughly-vetted visions, goals and policies in the existing plan, incorporating updated and consolidated language where necessary.

In 2014 and 2015, the City engaged the public in the process of developing final recommendations for the population and employment projections and UGA boundaries. Engagement opportunities included an online survey; two open houses; a dedicated discussion forum website (engage.cob.org); a dedicated Comprehensive Plan Update webpage (cob.org/compplan); and numerous group and individual meetings with neighborhoods, nonprofit groups, realtors, developers, and other interested stakeholders. Additionally, four work sessions and one public hearing were held with the Planning Commission, and three work sessions and one public hearing were held with the City Council. Over 100 letters and emails were submitted throughout the process to develop the forecasts and UGA boundaries.



Participants weighed in on growth options at the March 2015 open house.

Numerous Planning Commission and City Council work sessions and public hearings were also held in 2015 and 2016 on the updated Comprehensive Plan chapters. Periodic process updates were sent via email to a list of interested stakeholders. The draft chapters, meeting dates, presentations, public comments, comment trackers, and other information on the process were posted on the Comprehensive Plan update webpage. Approximately 150 comments were submitted between January and October 2016.

GOAL LU-6 Use transparent processes and involve stakeholders in decisions.

Policy LU-63 Encourage active, broad-based citizen participation in the creation of plans, regulations, and development proposals.

Policy LU-64 Develop innovative techniques to reach out to underserved populations and those typically not involved in planning efforts.

Policy LU-65 Support a culture of dialogue and partnership among residents, property owners, the business community, organizations, other interested citizens, and City officials.

Sustainable Land Use

In its broadest sense, sustainability encompasses an integrated set of social, economic and environmental principles that work together to provide a better future for ourselves and future generations. Embedded in this definition is the idea that policies and actions can be crafted that will simultaneously create an equitable society, strong economy and healthy environment. The City's Legacies and Strategic Commitments, which are woven throughout the Comprehensive Plan, serve as the City's sustainability principles. The goals and policies below highlight ways to protect the natural environment through land use decisions and provide guidance on fostering a healthier community.

This section complements the plan's other sustainability goals and policies, including those related to growth primarily within the existing City limits and in areas largely served by existing infrastructure and services, including the City's mixed-use urban villages. This approach reduces the need for additional development further out from the City's existing urban areas, thereby protecting open spaces and agricultural land and reducing dependency on single-occupancy vehicles. Well-designed infill in existing areas also helps balance opportunity and housing choice in every neighborhood.

GOAL LU-7 Protect and restore our community's natural resources (land, water and air) through proactive environmental stewardship.

Policy LU-66 Encourage design flexibility (e.g. clustering and low impact development) to preserve existing site features, including trees, wetlands, streams, natural topography, and similar features.

Low impact development refers to systems and practices that use or mimic natural processes that result in the infiltration, evapotranspiration or use of stormwater in order to protect water quality and associated aquatic habitat.

Policy LU-67 Establish land uses, development densities, impervious surface coverages and stormwater standards that minimize flooding, streambank erosion, and loss of aquatic and other habitat.

Policy LU-68 Through redevelopment opportunities, promote the restoration of streams, creeks and other environmentally-sensitive areas. Improve public access to these sites (when appropriate) and educate the public about their benefits.

Policy LU-69 Promote and encourage the use of sustainability tools and rating systems such as the STAR Community Rating System, Energy Star, LEED and LEED-ND. Explore the effectiveness of these tools in achieving sustainable development practices.



Volunteers helped restore habitat in 2015 as part of the Squalicum Creek re-route project.

Policy LU-70 Identify and strive to preserve scenic vistas of important natural features, such as the Cascade Mountains, Lake Whatcom, Bellingham Bay, Chuckanut Bay, the San Juan Islands and hills, that provide the natural backdrop to the City.

Policy LU-71 Review parking standards to reduce the impacts of parking lots on urban form, pedestrian mobility, and the natural environment. Continue to pursue parking management best practices.

GOAL LU-8 Protect and improve Lake Whatcom and its watershed to ensure a long-term, sustainable supply of water (see Environment Chapter).

Policy LU-72 Continue to designate receiving zones for development rights transferred from the Lake Whatcom Watershed in areas of the City appropriate for higher densities.

Policy LU-73 Continue implementing low impact development techniques in the Lake Whatcom Watershed and encourage LID approaches in new and redevelopment projects elsewhere throughout the City and UGA.

Policy LU-74 Continue working with Whatcom County and other entities to adopt regulations that restrict or prohibit land use practices and activities that cumulatively impact water quality.

Policy LU-75 Continue the Lake Whatcom Watershed Property Acquisition Program.

GOAL LU-9 Preserve historic and cultural resources.

Policy LU-76 Encourage preservation, restoration, and appropriate adaptive reuse of historic properties through code flexibility, fee reductions and other regulatory and financial incentives. Continue to designate and protect historic landmarks.

Policy LU-77 Protect significant archeological resources from the adverse impacts of development.



1303 Astor Street is listed on the National, State and Local Historic Registers.

Policy LU-78 Maintain an ongoing process of identification, documentation, and evaluation of historic properties to guide planning and decision making, as well as to provide reference and research material for use by the community.

Policy LU-79 Create and promote interpretative educational programs and activities about historic and cultural resources through City and nonprofit partnerships.

GOAL LU-10 Foster community connectedness to improve the health of residents.

Policy LU-80 Support implementation of the Whatcom County Community Health Improvement Plan, which is focused on community connectedness and resilience, child and family well-being, healthy active living, and health care access and service delivery (see Housing, Transportation and PRO Plan for additional goals and policies).

A growing body of evidence and best practices increasingly links planning decisions to environments that allow and encourage people to be physically active, eat nutritious food, and live in safe and healthy places.

Policy LU-81 Increase access to healthy food for all Bellingham residents by encouraging and supporting healthy food retail, farmers markets, and small-scale urban farms (e.g. residential and community gardens).

Policy LU-82 Consider using health impact assessments to assess the potential health impacts of land use and development decisions.

Policy LU-83 Support and encourage informal community gathering places in existing and new neighborhoods.



The Downtown Farmers Market brings the community together each Saturday during the growing season. Photo by Kenni Merritt.

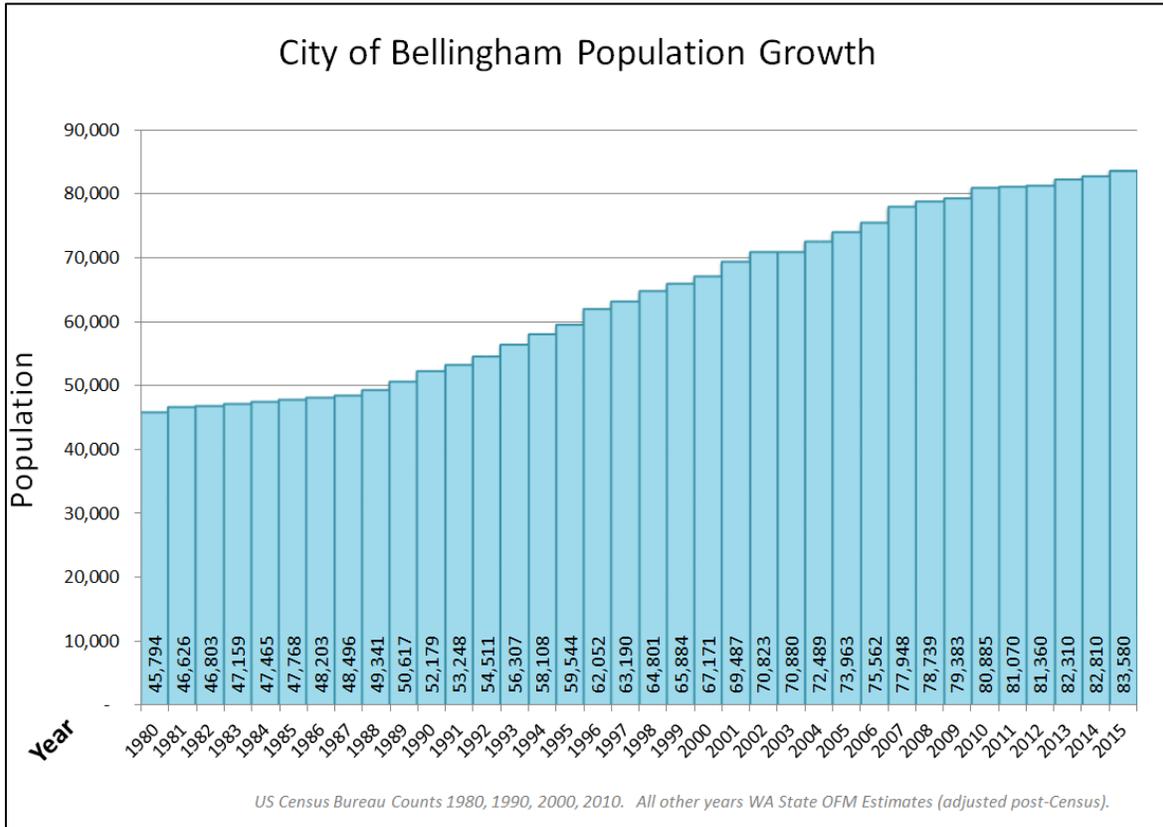
Policy LU-84 Encourage the integration of arts and culture into public places.

Policy LU-85 Accommodate the changing needs of residents as they age through considerations such as the design of safe, walkable neighborhoods; the convenient location of senior services; and universal design in building codes.

Multigenerational communities promote the well-being of children, youth and older adults, and provide opportunities for mutually-beneficial interaction among age groups. Access to quality health and social services is one key element of age-friendly communities.

Population

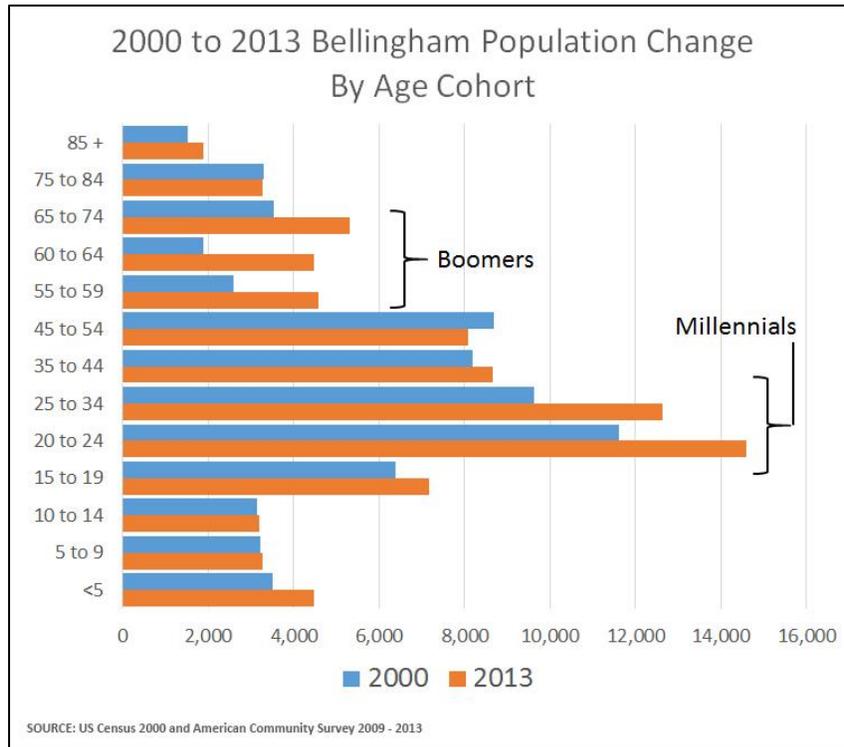
Bellingham's estimated 2015 population was 83,580 people. This is a doubling in population since 1980, with rapid growth through the 1990s and early 2000s (see chart). Growth since 2007 has been slower, but still steady.



The main source of population growth in Bellingham's urban area is in-migration. From 1960 to today, 66% to 75% of the population growth is a result of people moving to Bellingham. The other 25% to 33% of the growth is due to more births than deaths (natural increase).

Demographics

Age - As the "2000 to 2013 Bellingham Population Change by Age Cohort" chart shows, Bellingham and Whatcom County experienced significant growth over the past decade in the 20 to 34 and 55 to 74 age groups. Growth in the 18 to 24 group is primarily due to increased enrollment at the City's university and community colleges (one in five Bellingham residents identified themselves as a college student in the 2010 census). Growth in the 45 to 65 age group represents the aging of the baby boomers and the influx of retirees and others who have flexibility in choosing where they want to live.



Racial Diversity - According to the U.S. Census Bureau, the United States is projected to become a plurality nation by 2044. While the non-Hispanic White alone population will still be the largest, no race or ethnic group is projected to have greater than a 50% share of the nation’s total population. Shifts in the racial and ethnic composition of the future population are projected to occur primarily within the native population, which will become the majority-minority by 2044. The child population within the United States is even more diverse and is projected to experience the majority-minority crossover in 2020, just six years into the future.

Between 2000 and 2010, the proportion of Bellingham’s non-White population increased from 12% to 15%. The largest increase was in the “Asian or Pacific Islander” category, which increased from 4.2% of the total population in 2000 to 5.1% in 2010. People of Hispanic origin increased from 4.6% to 7%. Nearly 13% of persons five years and older speak a language other than English at home. The Bellingham School District reports that 43 different languages are spoken in their schools, with Spanish, Russian and Punjabi as the most common after English.

Households - Bellingham’s average household size was 2.24 persons per household in 2000 and decreased to 2.18 in 2010. This number has been declining for some time and mirrors national trends. Smaller household sizes in Bellingham are likely due to increasing enrollment at the City's three college campuses and increasing numbers of seniors and millennials. College students make up over 20% of the Bellingham's total population, and 70% of Bellingham households have one to two people.

Housing Mix and Tenure - Approximately 44% of the existing housing stock in Bellingham is multi-family. The percentage of multi-family units is likely to continue to increase, as much of the remaining residential land is zoned for multi-family housing. Accordingly, the future demand analysis assumes

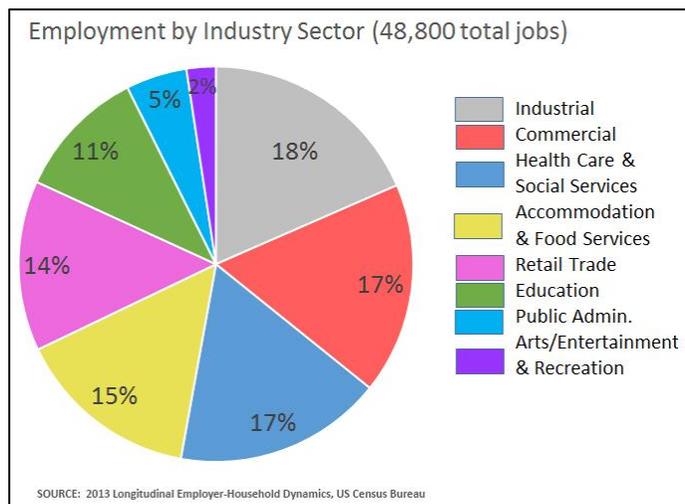
69% of housing growth will be multi-family, resulting in a 2036 mix of 51% multi-family and 49% single-family housing. Since 2000, the percentage of owner-occupied housing units has been decreasing. In 2000, this figure was 48%, while it was 46% in 2013. Renter-occupied housing units comprised 54% of the housing stock in 2013.

College Students - In 2013, the U.S. Census Bureau estimated there were about 17,600 college students in Bellingham (21% of the City's population). Students were split between 93% undergraduate and 7% graduate programs, and about 76% were between the ages of 18 and 24. Enrollment statistics for 2015 from WWU show 15,000 students, of which 90% are from in-state locations. About 75% of the students enrolled at WWU live off campus. Whatcom Community College serves 11,000 part-time students with credit hours equivalent to 4,000 full-time-enrolled (FTE) students. About 570 of these WCC students are part of high school Running Start programs. Bellingham Technical College (BTC) serves 5,500 part-time students with credit-hours equivalent to 2,040 FTE. About 60 of these BTC students are part of high school Running Start programs.

Income - Between 2000 and 2014, Bellingham's median household income increased from \$32,530 to \$42,440. Median family income increased from \$47,196 to \$63,355 during that same time frame. The percentage of individuals at or below poverty level increased from 20.6% to 23.2%. The 2015 Washington State Housing Needs Assessment shows that 20% of Bellingham households are severely cost-burdened, spending more than 50% of their income for housing. Another 18% are cost-burdened, spending more than 30% of their income on housing.

Early experiences and environmental influences can leave a lasting signature on the genetic predispositions that affect emerging brain architecture and long-term health. The Adverse Childhood Experiences (ACEs) include abuse or neglect, the death of a parent, parental divorce or separation, witnessing domestic violence, living with someone who has a mental illness or substance abuse problem, and incarceration of a household member. Recently, researchers have proposed adding chronic economic hardship and living in poverty to the list. As the number of ACEs increases, so does the risk for reported lower income, greater unemployment, lowered educational attainment, mental illness, smoking, and early death.

Employment - In 2013, Bellingham and its UGA accommodated 48,800 jobs, or 64% of the total employment in Whatcom County. About 42% of these jobs include workers who also live in Bellingham, while about 58% work in Bellingham, but live elsewhere. About 44% of Bellingham's employed residents commute to other places for work. Employment by industry sector can be seen in the figure at right.

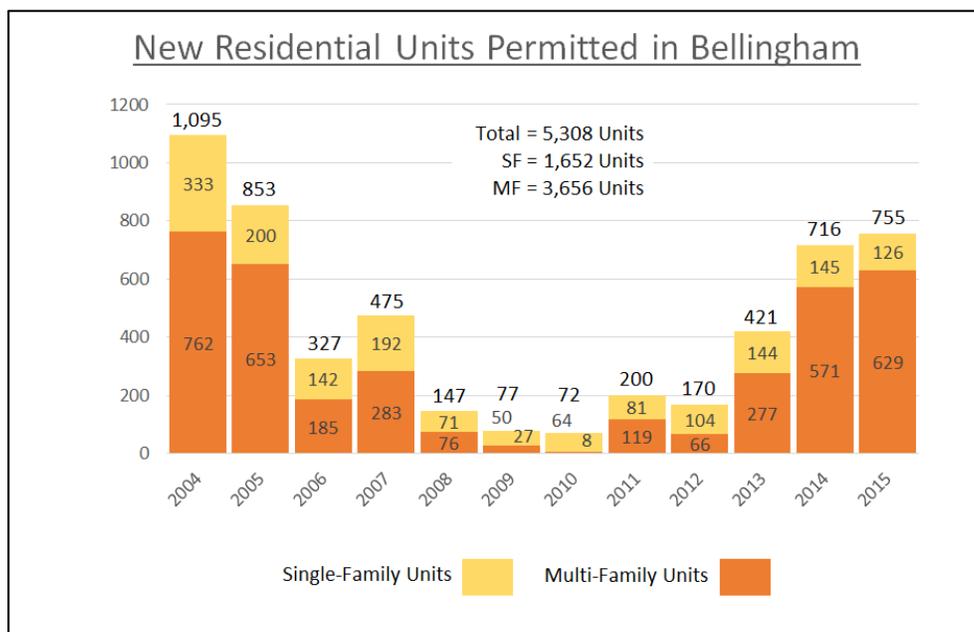


Citywide Development Activity

Bellingham has experienced significant growth throughout the past 10 years. Academic institutions, including WWU, WCC, and BTC, all had significant growth throughout the Recession as a displaced labor force sought training opportunities and

undergraduates pursued affordable, quality education. The St. Joseph's Hospital campus includes a world-class cardiac center and continues to expand its role as the region's primary health services provider. The West Bakerview corridor has seen rapid growth, with over 500 hotel rooms, 400,000 square feet of retail and commercial services, and 350 residential units (with 450 additional units under review). The James/Iowa and Irongate areas have also seen steady light industrial development with a mix of new construction and expansion of existing operations.

After a dip during the Recession, residential building permits are also increasing (see New Residential Units Permitted in Bellingham chart). One hundred seventy units were permitted in 2012, and over 750 permits were issued in 2015. Forty five percent of all housing units built in Bellingham since 2006 were built in urban villages.



Land Capacity and Growth Targets

The GMA requires cities and counties to adopt comprehensive plans and set UGA boundaries to accommodate the 20-year projected population, housing, and job growth. The population growth projections must be within the range provided by the State Office of Financial Management (OFM). Growth forecasts help communities plan future land use, infrastructure and service, school, housing, and parks and open space needs for the projected population.

As a first step in the process, the county and cities hired a consulting firm, BERK, to develop the Whatcom County Population and Employment Projections and UGA Allocations - Phase I Technical Report. This 2013 report included preliminary allocations to UGAs and rural areas primarily based on past growth trends and shares. These figures represented a starting point for public input and discussions by the Planning Commission and City Council. BERK also issued a report titled Background Research on Selected Economic, Demographic, and Housing Trends. The county and cities then issued recommendations to adjust the technical allocations based on county and City goals, public input, infrastructure capacity, land availability, and other factors. This step included

several meetings of the Whatcom Planning Commission, Bellingham Planning Commission, and Bellingham City Council in late 2013 and early 2014.

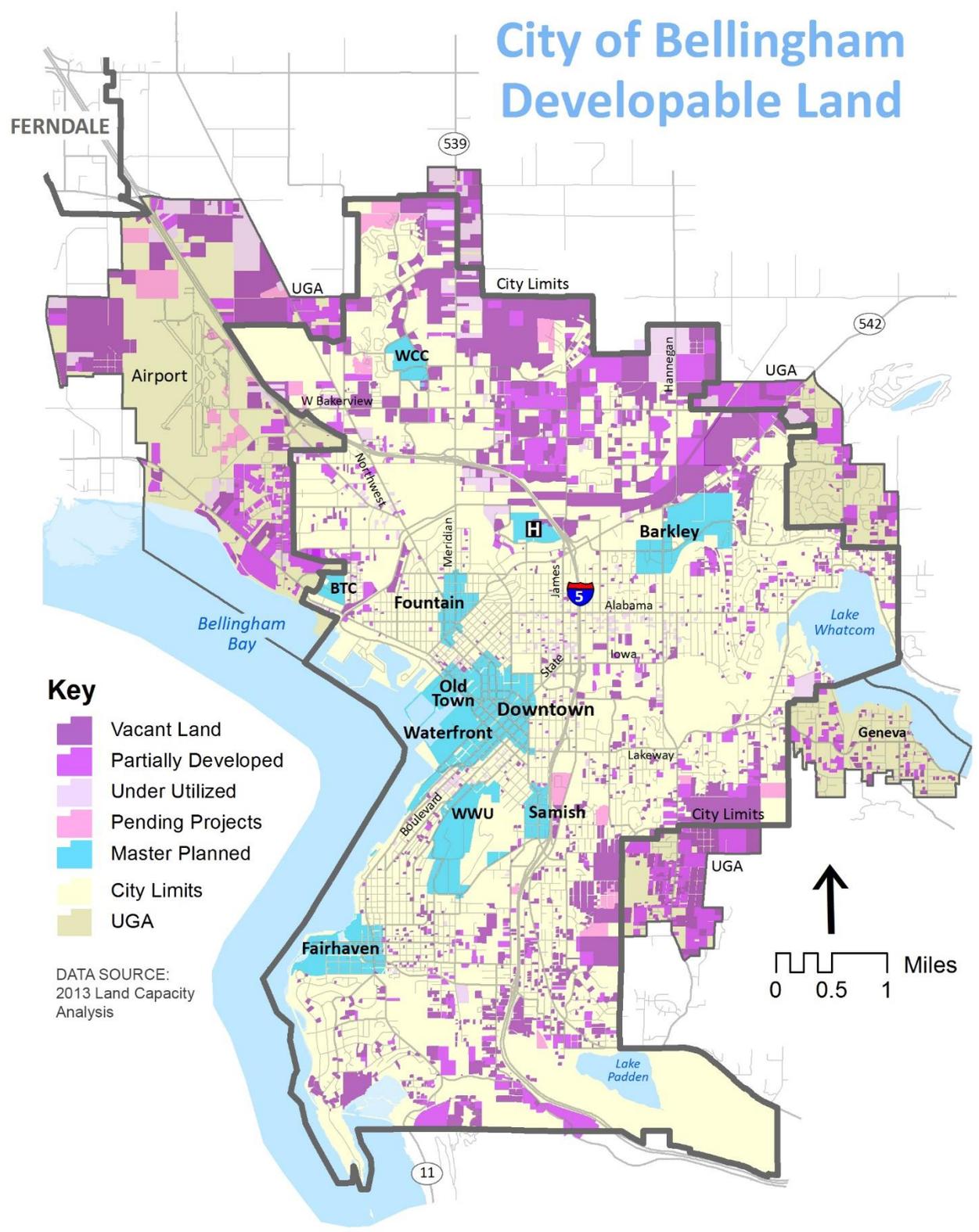
Multi-Jurisdictional Resolution - The next major step included the adoption of preliminary population and employment projections in 2014. The Planning Commission and City Council recommended the high-range population growth forecast of 35,900 people (or 1,562 people per year) and the high-range employment forecast of 22,641 new jobs. The Whatcom County Council concurred with the City's recommendations and included the high-range projections in a non-binding multi-jurisdictional resolution (MJR), which provided preliminary growth allocations for conducting environmental review, further analyzing land capacity, developing draft land use planning proposals, modeling traffic patterns, and formulating draft capital facilities plans for the county and cities within the county. The resolution specifically noted that the allocations were preliminary and subject to change based on subsequent study, review, and input.

Land Capacity Analysis - To evaluate and quantify future housing and employment capacity, the county and cities developed a detailed methodology to use in Whatcom County's Land Capacity Analysis (LCA). The City's input into the process followed the adopted methodology and used parcel-based geographic information system (GIS) data with the best available mid-2013 environmental constraints, ownership, zoning, and infrastructure layers.

The LCA indicates capacity for about 33,006 new people and 27,302 new jobs by 2036. The majority (about 90%) of future housing will be accommodated in existing neighborhoods and urban villages within the City limits, with about 10% accommodated in the unincorporated UGA. Future job growth will be accommodated in urban villages, institutional areas, such as WWU, BTC, WWC, and St. Joseph's Medical Center, as well as through industrial and commercial sites in the northern portion of the City. Downtown is expected to remain the job center for the City and Whatcom County (see Land Capacity Analysis Population, Housing & Jobs Breakout chart and Developable Land map).

Land Capacity Analysis, Population, Housing & Jobs Breakout

Growth Area	2013 Population, Housing & Jobs					Estimated Growth Capacity			Forecast Growth			2036 Forecast Total Population, Housing & Jobs				
	All Housing Units	Single Family Hsg	Multi-Family Hsg	Estim Pop	Estim Jobs	New Housing Units	New Pop	New Jobs	New Housing Units	New Pop	New Jobs	All Housing Units	Single Family Hsg	Multi-Family Hsg	Forecast Total Pop	Forecast Total Jobs
Urban Villages	2,387	602	1,785	8,575	16,549	6,866	11,695	4,740	6,459	11,001	3,930	8,846	986	7,860	19,576	20,479
Other Areas Inside City Limits	34,852	19,209	15,643	73,735	40,736	8,821	18,078	13,400	8,299	17,009	11,113	43,151	23,299	19,852	90,744	51,849
Unincorporated Urban Growth Area	4,218	3,473	745	10,797	4,863	1,436	3,233	9,162	1,351	3,040	7,598	5,569	4,540	1,029	13,837	12,461
Totals	41,457	23,284	18,173	93,107	62,148	17,123	33,006	27,302	16,109	31,050	22,641	57,566	28,825	28,741	124,157	84,789



Areas in the City's unincorporated UGA with some growth potential include those to the northwest, northeast, and southeast of the City limits. Residential growth potential in other areas of the existing unincorporated UGA is limited due to the Lake Whatcom Watershed, Bellingham International Airport, industrial land encumbered by wetlands, and Lummi Tribal Trust land.

The MJR population growth allocation (35,900) exceeds current capacity by about 3,200 people. This shortfall equates to about 1,385 to 1,545 housing units, depending on the mix of single-family and multi-family housing.

Accommodating Growth - As such, the City reviewed potential UGA expansion areas for land suitable for urban levels of residential development. The results indicated that there is very little room for growth outside Bellingham's existing unincorporated UGA. Constraints include Bellingham Bay and the Nooksack River to the west; the Lake Whatcom Watershed and forested foothills to the south and east; and a system of wetlands, low-density rural development, and the Ferndale UGA to the north. Only two areas were identified as potentially appropriate for urban levels of development - the South Caitac property and the South Yew Street UGA Reserve area (see map of City, UGA and UGA Reserves).

Upzones in Bellingham's neighborhoods were not pursued as a means of accommodating additional growth because of the infill capacity already allowed by current zoning and the need to allow time for the adopted urban villages to reach forecasted growth. The LCA shows that the majority of new development will take place in newly-designated neighborhoods and existing urban villages without changes to zoning designations. Additional growth capacity exists within potential urban villages that were previously identified but not yet established, along transit corridors connecting urban villages, and in other areas where rezones may be appropriate within the planning period.

Environmental Impact Statement - Also in 2015, the county issued a Draft EIS (DEIS) for the plan, development regulations update, and UGA review. The DEIS describes the existing conditions and identifies probable significant environmental impacts and measures to mitigate these impacts. Four alternatives were studied in the DEIS, addressing a range of population and employment growth levels and patterns.

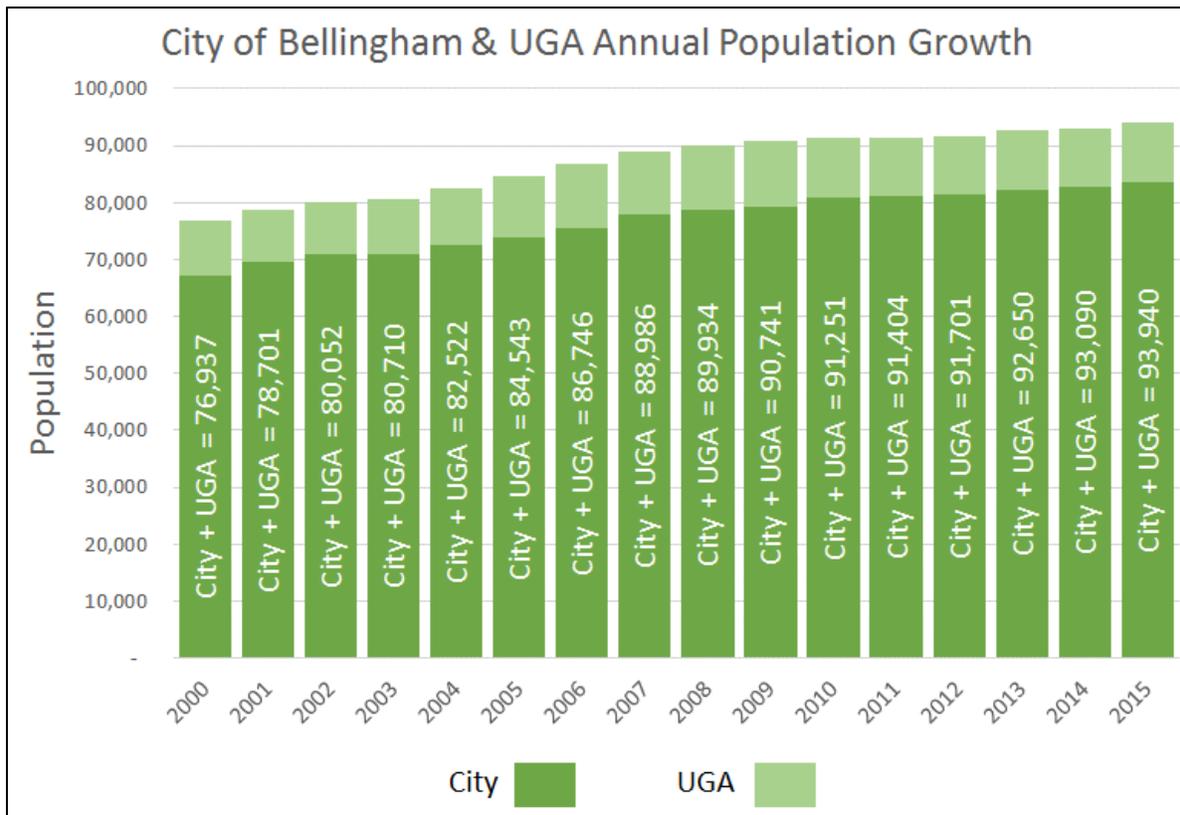
In September 2015, the City Council recommended to the county the mid-range 2036 population forecast of 121,505 people, and high-range employment forecast of 84,788 total jobs.

The Final Environmental Impact Statement (FEIS) indicating the MJR as the preferred alternative was issued in November 2015. With the City's recommended mid-range population forecast, the capacity exceeded the projected growth by approximately 4,280 people (or approximately 15%). As such, the final EIS included a range for Bellingham's 2036 population of 121,505 to 124,157 people. The top of the range includes the existing capacity of the City and unincorporated UGA. To supplement the County's FEIS, the City developed a State Environmental Policy Act (SEPA) checklist for non-project proposals, resulting in a Determination of Non-Significance (DNS).

These forecasts do not necessitate upzones of property within the existing City limits or expansion of the City's existing UGA. However, the City did recommend that the South Caitac property be designated as a new UGA Reserve area to protect one of the City's few expansion areas from unsuitable land use patterns that might hinder its ability to accommodate urban development in the

future. The South Yew Street area is recommended to remain in Reserve status (see map of City, UGA and UGA Reserves).

The BERK mid-range 2036 population growth forecast, which is within the range provided by OFM, should be considered the most likely to occur due to the fact that it is the closest to the growth rate of the past 15 years. As such, it represents the least amount of risk (see City of Bellingham and UGA Annual Population Growth chart). It also promotes the City's continued focus on growth within the City limits, including infill and the urban villages, as its main growth strategy and is consistent with recent capital facilities planning and the City's ability to provide the full range of urban services.



The Whatcom County Council adopted Ordinance 2016-034, completing the county's 2016 Comprehensive Plan update and UGA review, on August 9, 2016. The plan includes 2036 figures of 124,157 people and 84,788 jobs for Bellingham. The population projection is slightly higher than the City's recommendation of the mid-range forecast, which would have resulted in a 2036 population of 121,505 people. It also shows no change to Bellingham's UGA boundaries, with the S. Caitac area as a new UGA Reserve and the S. Yew Street area remaining in UGA Reserve status.