

**Whatcom County  
Request for Proposals  
RFP #23-60**

Notice is hereby given that sealed proposals will be received by Whatcom County Purchasing at its Office in the Administrative Services Finance Department located on the fifth floor of the Whatcom County Courthouse, 311 Grand Avenue, Suite 503, Bellingham WA 98225 for the following:

**2025 COMPREHENSIVE PLAN UPDATE  
UNTIL: 2:30 PM Tuesday August 29, 2023**

At which time and place the responses will be publicly opened (live/virtual via GoToMeeting), and the names of the submitters read aloud. All interested people are invited to attend the live proposal opening via GoToMeeting. Late submittals will not be considered.

Whatcom County is requesting proposals from qualified consultants to provide assistance with the comprehensive plan updates, urban growth area reviews, development regulation revisions, and environmental analysis in accordance with the Growth Management Act (GMA).

Further information is contained in the RFP document, which can be downloaded at no charge from the Whatcom County Purchasing website at <https://www.co.whatcom.wa.us/Bids.aspx>, see “Related Documents” at the bottom of the RFP posting page. If you are unable to download the pdf documents from this website, contact Purchasing at [FN\\_Purchasing@co.whatcom.wa.us](mailto:FN_Purchasing@co.whatcom.wa.us) (preferred), or phone (360) 778-5330.

Whatcom County affirms it will not discriminate against, or grant preferential treatment to any individual or group on the basis of race, sex, color, ethnicity, or national origin in the operation of public employment, public education, or public contracting. Whatcom County encourages disadvantaged, minority and women owned consultant firms to respond. Persons with disabilities may request this information be prepared and supplied in alternate forms by contacting Purchasing at (360) 778-5330.

Whatcom County reserves the right to reject any or all proposals and to waive any irregularities.

Publication Date(s): July 26 and August 2, 2023.



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they should be chosen to supply the service needed. If there are areas in which the proposer cannot or may not comply, the letter must specify and explain them.

The letter must be signed by a person legally able to commit to the project.

- History & Experience** Provide a brief history of the firm and identification of ownership.
- Provide examples of similar work performed, including descriptions of relevant projects and samples of written reports.
- Describe your familiarity with Whatcom County.
- Qualifications/Staff** Provide names and qualifications of those persons that will be assigned to work on the project, detailing their background and experience.
- References** Provide at least three (3) professional references.
- Writing samples** Provide at least two (2) writing samples.
- Price** Provide the proposed fees for the services to be provided, based on the Detailed Scope of Work (Exhibit 1).

**PROPOSAL SUBMITTAL**

Submit **one (1) unbound original** of the proposal in a sealed package marked on the outside as follows:

- Name of Submitter
- RFP #23-60, 2025 Comprehensive Plan Update

Send or deliver the proposal to:

Attn: Sara Winger, Senior Purchasing Coordinator  
Whatcom County, AS Finance/Purchasing  
311 Grand Avenue, Suite 503  
Bellingham WA 98225

The proposal must be received **no later than 2:30 PM, Tuesday, August 29, 2023. Late submittals will not be considered.** Responses transmitted directly to Whatcom County electronically or by fax will not be considered.

Proposals shall be deposited at the designated location prior to the date and time for receipt of proposals as indicated in the Invitation, or such revised date as may be specified by an addendum.

No oral, telephone, or electronically submitted proposals or modifications will be considered.

It is the submitter's responsibility to deliver the document to the proper address by the assigned time. Whatcom County accepts no responsibility for lost or misdirected submittals.

All proposals, received on time, will be opened in a public format via GoToMeeting, immediately following collection of all submittals received by the deadline time. All interested people are invited to attend the live solicitation opening via GoToMeeting as follows:

Please join my meeting from your computer, tablet, or smartphone.

<https://meet.goto.com/273232365>

You can also dial in using your phone.

(For supported devices, tap a one-touch number below to join instantly.)

United States: +1 (571) 317-3129

- One-touch: <tel:+15713173129,,273232365#>

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**QUESTIONS**

All questions regarding this matter should be directed in writing via email to **all** of the following:

Steve Roberge, [SRoberge@co.whatcom.wa.us](mailto:SRoberge@co.whatcom.wa.us)

Matt Aamot, [MAamot@co.whatcom.wa.us](mailto:MAamot@co.whatcom.wa.us)

**EVALUATION AND SELECTION**

The selection of a consultant for this project will be made from the qualified consultants responding to this RFP. All firms responding will be evaluated, scored, and ranked. The top evaluated proposers may be invited for an interview with Whatcom County to select the most qualified.

Consultants will be evaluated and ranked based on the following criteria:

1. Firm background and experience in the provision of similar services (25%)
2. Experience and qualifications of persons doing the work (25%)
3. Adequacy and effectiveness of samples of prior work (25%)
4. Responsiveness and completeness of proposal (10%)
5. Price and consultant staff fee structure (15%)

The County assumes no obligation of any kind for expenses incurred by any respondent to this solicitation. If the RFP does not include these items, is not submitted on time, or exceeds the specified page length limit, it will be deemed non-responsive and will not be eligible for further consideration. All submittals become the property of Whatcom County and will not be returned.

**PROJECT BUDGET**

The preliminary budget estimate is anticipated to be in the range of approximately \$700,000 to \$1,300,000 for the project.

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**Exhibit 1 – Detailed Scope of Work**

The Whatcom County Department of Planning and Development Services, in coordination with the cities, is initiating a multi-year project to update the Whatcom County Comprehensive Plan, conduct the urban growth area (UGA) review, and revise development regulations by June 30, 2025, as required by the Washington State Growth Management Act (GMA).

The GMA includes the following provisions:

- RCW 36.70A.130(1) requires review and, as necessary, update of the comprehensive plan and development regulations; and
- RCW 36.70A.130(3) requires the County to review its UGAs and, as necessary, revise the UGAs to accommodate the urban growth projected to occur in the succeeding 20-year planning period.

Considering the 2025 update process as a whole, project goals include:

- Public Participation/Community Values – Provide public participation opportunities in accordance with the GMA. Ensure that community values are incorporated in the Whatcom County Comprehensive Plan;
- County/City Coordination – Ensure coordination and consistency between County and city comprehensive planning efforts;
- Tribal Participation – Coordinate with federally recognized Indian tribes that voluntarily choose to participate in the planning process;
- Environmental Analysis – Analyze and address environmental impacts, mitigation, and alternatives;
- Growth Planning – Guide urban growth, rural land use, housing policy, utilization and conservation of resource lands, provision of public facilities and services, and preservation of critical areas over the 20-year planning period;
- Housing – Analyze and address policy and code changes to promote greater housing availability and affordability for all economic segments of the community;
- State Law Compliance – Facilitate County Council action to review and, as needed, revise the Whatcom County Comprehensive Plan, UGAs, and development regulations to ensure compliance with the requirements of the GMA; and
- Whatcom County Comprehensive Plan/Regulations – Address the priorities for the Whatcom County Comprehensive Plan update as expressed in Whatcom County Council Resolution 2022-036 and other issues identified by the County.

The consultant team will support and provide planning services to Whatcom County (County) in the Comprehensive Plan update, UGA review process, and development regulation revisions. The project will be completed by June 30, 2025.

**Project Description**

The scope of work represents the consultant tasks in a multi-year process to complete the 2025 Comprehensive Plan update, UGA review, and development regulation revisions. Specifically, consultant services will be provided to achieve the following:

1. Population/Housing Unit/Household Projections and Allocations – Utilize the State Office of Financial Management (OFM) medium population projection as the county-wide baseline projection and develop low and high county-wide projections around the OFM medium projection. Develop county-wide housing unit, household projections, group quarter population, and emergency housing/shelter needs for the 2023-2045 period utilizing State Department of Commerce tools and considering other factors as appropriate. Develop population, housing unit, household, and group quarter growth allocations to UGAs, transportation analysis zones and public facility/service providers.
2. Employment Projections and Allocations – Develop county-wide employment projections for the 2023-2045 period. Develop employment allocations to UGAs, transportation analysis zones and public facility/service providers.

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3. Land Capacity Analysis – Assist the County and cities in developing the Land Capacity Analysis Methodology and conducting land capacity analyses for permanent housing needs for each city UGA, each non-city UGA, and land outside of UGAs. Prepare a draft Land Capacity Analysis Methodology and draft land capacity analyses for emergency housing and emergency shelter for each city UGA, each non-city UGA, and land outside of UGAs.
4. SEPA Environmental Analysis – Complete the SEPA process for the Comprehensive Plan, UGA Review, and development regulation revisions. It is anticipated that this will include preparation of a draft Environmental Impact Statement (EIS) and final EIS.
5. Transportation Model Analysis - The Whatcom Council of Governments (WCOG) will supply transportation modeling services for the land use alternatives studied in the draft EIS and the additional modified alternative studied in the final EIS. The consultant will develop household, group quarter population and employment allocations by Transportation Analysis Zones (TAZ). The consultant will use model outputs of volumes supplied by the WCOG and determine appropriate multi-modal level of service (LOS) results for the 2023 base year and each 2045 land use alternative.
6. Housing Elements – Develop background information and analysis necessary to address GMA housing element requirements (RCW 36.70A.070(2)) for County and city comprehensive plans. Draft proposed revisions to the County Comprehensive Plan housing chapter to comply with GMA housing element requirements. Provide assistance to the County and the cities to formulate code amendments to address housing availability and affordability for all economic segments of the community.
7. Tribal Participation in Planning – Draft Countywide Planning Policies that address the protection of tribal cultural resources consistent with RCW 36.70A.210(3)(i) and (4). Assist the County and cities to develop and implement a memorandum of agreement (MOA) with federally recognized Indian tribes that voluntarily choose to participate in the planning process consistent with RCW 36.70A.040(8). If a MOA is adopted, assist the County, cities, and tribe(s) to coordinate their planning efforts for UGAs (per RCW 36.70A.110(1)) and other areas consistent with the terms outlined in the MOA.
8. Climate Change Response – Integrate the requirements of Engrossed Second Substitute House Bill 1181, passed by the State Legislature in 2023, relating to climate response in Countywide Planning Policies, comprehensive plans, and development regulations.
9. The Forty Year Planning Strategy - Review each city, UGA, and UGA Reserve and recommend how these areas, and the regulations governing them, could be modified to provide an additional twenty-year supply of residential and employment capacity to support projected growth from 2045-2065.
10. Project Management/Periodic Update Checklists - Progress reports and invoicing, schedule, consultant and County team meetings and conferences. Completing preliminary draft State Department of Commerce’s Periodic Update Checklists for the County and cities.
11. Whatcom County Comprehensive Plan/Regulations – Assist the County to address priorities identified in Resolution 2022-036, conduct a county-wide mineral resource lands assessment, update the Whatcom County 20-Year Capital Facilities Plan (Appendix E), review subarea plans, analyze the Columbia Valley UGA – Planned Light Impact Industrial area, address essential public facilities, identify open space within and between UGAs, evaluate limited areas of more intensive rural development (LAMIRDs), and develop a public participation plan.

**Assumptions**

The scope and budget contained in this document are predicated upon the following provisions, assumptions, and conditions. The purpose of this list is to enumerate and describe mutual expectations and understandings required of all parties to this scope of work in order to complete the project on time and within budget.

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- Budget cost estimates for each task may be transferred from one task to another due to greater or lesser level of effort, provided that each task is completed and the total budget is not exceeded. Work in the “contingency” category will be pre-authorized by the County.
- Additional service requests or alterations beyond those described in this document will require supplemental contract modifications or explicit pre-approved substitutions. The consultant will not perform additional work until written authorization is provided.
- Whenever possible, research and data collection will be based on readily available secondary sources of information, including previous environmental documents, reports, inventories, maps and other similar literature from local governments and other sources.
- The County will provide available necessary government documents, subarea plans, prior EIS documents, studies, GIS data layers, mapping and other technical information pertaining to the County, including any appropriate electronic GIS data and aerial photos. The County will provide Assessor data to the consultant. The County may provide any or all information in electronic format (including website links).
- The consultant will provide GIS services only when pre-authorized by the County.
- Whatcom County is responsible for document reproduction and distribution of all review and final drafts for the purpose of staff comments. All consultant preliminary draft deliverables will be limited to electronic file transfers and “camera ready” documents.
- County/City review and comment on draft documents will occur in accordance with the project schedule.
- The consultant will attend virtual meetings and/or conference calls with staff relating to the Comprehensive Plan update, UGA review, and development regulation revisions. The consultant will attend in-person up to three public meetings, such as County Planning Commission and/or County Council meetings, relating to the project.
- The consultant will attend virtual meetings and/or conference calls with staff relating to the SEPA review process. The consultant will attend in-person up to two public meetings relating to environmental review (e.g., a scoping meeting and public hearing on the draft EIS).

The scope of work to be completed by the consultant is set forth below. Work on tasks 1-27 above will commence concurrently consistent with the approved schedule. These tasks are not necessarily in sequential order. Priority will be given, at the direction of Whatcom County Planning and Development Services.

**Task 1: Population, Housing Unit & Household Projections and Allocations**

Projections of future population, housing units, households, group quarter population, and emergency housing/shelter needs are an integral component of land use planning. In December 2022, the Washington State Office of Financial Management (OFM) issued a twenty year population projection for the County. The consultant will assist the County and the cities to develop new projections and allocations for the 2023-2045 timeframe. Development of new projections and allocations will consider:

- Census data
- OFM population estimates and projections
- Washington Department of Commerce Establishing Housing Targets for your Community Guidance and Tools
- Consistency with past population growth trends
- Employment trends and projections
- Social, economic, and demographic factors and trends

The following work elements identify specific activities related to population projections:

- 1.1 Review data, including Census data and OFM population estimates and projections.
- 1.2 Develop baseline data, including historic population estimates for UGAs and other study areas and historic growth rates.

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- 1.3 Coordinate with cities and other jurisdictions to ensure consistent planning.
- 1.4 Utilize the OFM medium population projection as the county-wide baseline projection for the 2023-2045 timeframe. Develop low and high county-wide population projections for the 2023-2045 timeframe. Use the State Department of Commerce’s “Housing for All Planning Tool” to develop low, medium, and high county-wide projections of permanent housing units, households, group quarter population, and emergency housing/shelter needs for the 2023-2045 timeframe. Prepare documents setting forth and explaining the projections.
- 1.5 Modify the State Department of Commerce’s “Housing for All Planning Tool” to develop 2023 baseline and low, medium, and high technical allocations of population, permanent housing units, households, group quarter population, and emergency housing/shelter needs for urban growth areas and the land outside urban growth areas for 2025, 2031, 2035, and 2045 and other years within the 20-year planning period requested by the County. Prepare documents setting forth and explaining the technical allocations.
- 1.6 Develop 2023 baseline and low, medium, and high technical allocations of population, housing units, households, and group quarter population for 2025, 2031, 2035, and 2045 and other years within the 20-year planning period requested by the County to transportation analysis zones and public facility and service providers (e.g., water purveyors, sewer purveyors, school districts, fire districts and park districts). Prepare documents setting forth and explaining the technical allocations.
- 1.7 The consultant will assist the City/County Planner Group and the County Council to develop policy based allocations of population, permanent housing units, emergency housing/shelter needs, households, and group quarter population to each UGA and land outside UGAs. The consultant will assist the City/County Planner Group and the County Council to develop policy based allocations of population, permanent housing units, households, and group quarter population to transportation analysis zones and public facility and service providers (e.g., water purveyors, sewer purveyors, school districts, fire districts and park districts). These allocations will be for 2025, 2031, 2035, and 2045 and other years within the 20-year planning period requested by the County to. Prepare documents setting forth and explaining the policy allocations. The consultant will answer questions and provide strategic advice in relation to the policy based allocations, GMA, and other factors.
- 1.8 Develop a background research document on selected economic, demographic, and housing trends. Include an analysis of:
  - Canadian influence on Whatcom County real estate markets;
  - Telecommuting and other national, regional, and local trends affecting migration;
  - National, regional, and local housing trends and preferences;
  - Whatcom County migration patterns; and
  - Age cohort changes (historical and projected) and other relevant local circumstances to inform the allocation and scenario development processes.

**Task 2: Employment Projections and Allocations**

The consultant will review current state employment projections. The consultant will assist the County and the cities to develop new employment projections for the 2023 to 2045 timeframe, including total employment and employment by sector. The consultant will:

- 2.1 Review and summarize historic and current data and economic conditions.
- 2.2 Develop baseline data, including historic employment estimates for UGAs and other study areas and historic growth rates.



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- 2.3 Consult with other agencies and jurisdictions to ensure coordinated and consistent planning. Review the Whatcom County Comprehensive Economic Development Strategy and local economic development goals provided by the County and cities.
- 2.4 Develop low, medium, and high County-wide employment projections for the 2023-2045 timeframe. Prepare documents setting forth and explaining the projections.
- 2.5 Develop 2023 baseline and low, medium, and high technical allocations of total employment and employment by sector to each UGA and land outside UGAs for 2025, 2031, 2035, and 2045 and other years within the 20-year planning period requested by the County. Prepare documents setting forth and explaining the technical allocations.
- 2.6 Develop 2023 baseline and low, medium, and high technical allocations of total employment and employment by sector for 2025, 2031, 2035, and 2045 and other years within the 20-year planning period requested by the County to transportation analysis zones and public facility and service providers (e.g., water purveyors, sewer purveyors, school districts, fire districts and park districts). Prepare documents setting forth and explaining the technical allocations.
- 2.7 The consultant will assist the City/County Planner Group and the County Council to develop policy based allocations of total employment and employment by sector to each UGA, land outside UGAs, transportation analysis zones and public facility and service providers (e.g., water purveyors, sewer purveyors, school districts, fire districts and park districts). These allocations will be for 2025, 2031, 2035, and 2045 and other years within the 20-year planning period requested by the County. Prepare documents setting forth and explaining the technical allocations. The consultant will answer questions and provide strategic advice in relation to the policy based allocations, GMA, and other factors.

**Task 3: Land Capacity Analysis**

The consultant will assist the County and cities to develop the Land Capacity Analysis Methodology for permanent housing. The consultant will assist the County and cities to conduct the land capacity analysis for permanent housing needs for each UGA and land outside of UGAs. The consultant will prepare a draft methodology and land capacity analysis for emergency housing and emergency shelter for each UGA and land outside of UGAs. The consultant will update a technical memo relating to employment.

**3.1 Land Capacity Analysis Methodology for Permanent Housing Needs**

The consultant will review the draft Whatcom County Land Capacity Analysis for Permanent Housing Needs Methodology and recommend any needed changes to make it consistent with the Growth Management Act, Washington Administrative Code, and the Department of Commerce’s *Guidance for Evaluating Land Capacity to Meet All Housing Needs*.

**3.2 Land Capacity Analysis for Permanent Housing Needs**

The consultant will modify each existing Suitable Land Tool spreadsheet that the County and cities developed in the Buildable Lands process (that contain the jurisdictions’ existing data and assumptions) to incorporate changes needed to implement the Whatcom County Land Capacity Methodology for Permanent Housing Needs, including housing needs by income level. The consultant will train and support the County and cities in using the modified land capacity spreadsheets.

**3.3 Land Capacity Analysis Methodology for Emergency Housing and Shelter**

The consultant will develop a draft land capacity analysis methodology for emergency housing and shelter consistent with the Growth Management Act, Washington Administrative Code, and the Department of Commerce’s *Guidance for Evaluating Land Capacity to Meet All Housing Needs*. The consultant will work with the Whatcom County Health and Community Services Department and the City/County Planner Group when developing the draft.

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**3.4 Land Capacity Analysis for Emergency Housing and Shelter**

The consultant will prepare a draft land capacity analysis for emergency housing and emergency shelter for each UGA and land outside of UGAs, consistent with the Growth Management Act, Washington Administrative Code, and the Department of Commerce’s *Guidance for Evaluating Land Capacity to Meet All Housing Needs*.

**3.5 Update Technical Memo - Square Feet Per Job**

The consultant will update the *Technical Memo Estimating Square Feet Per Job for Commercial and Industrial Lands in Whatcom County* (October 20, 2020) prepared by the City of Bellingham. It is anticipated that the City of Bellingham will provide countywide employment data to the consultant to update the Technical Memo if allowed by the State Employment Security Department.

**Task 4: SEPA Environmental Analysis**

Consistent with WAC 197-11, the consultant will prepare a SEPA environmental impact statement to evaluate a range of Comprehensive Plan and UGA alternatives, along with associated development regulation amendments, if required by the Whatcom County SEPA Responsible Official. The proposed level of detail for environmental analysis will be programmatic and area-wide.

The environmental topics described below represent the preliminary list of anticipated topics that the consultant will address for the SEPA analysis. However, the final list of topics will be determined through the scoping process and the scope and budget may be amended if the scoping process produces additional topics not anticipated to date or if anticipated topics can be removed.

**4.1 Scoping**

Through a public review process consistent with the SEPA rules, the consultant will work with the County to determine the scope of the EIS.

**4.2 Prepare Preliminary Draft EIS**

The consultant will compile and prepare a Preliminary Draft EIS based on tasks 4.2.1 to 4.2.12. Following County and City review of the Preliminary Draft EIS, the consultant will review County and City staff comments.

**4.2.1 General Sections**

The consultant will prepare the required environmental summary, fact sheet, table of contents, distribution lists, and references.

**4.2.2 Alternatives Description**

The consultant will incorporate draft descriptions of each of the alternatives that have been developed by the City/County Planner Group (it is anticipated that there will be a no action alternative and three action alternatives). The purpose of the descriptions is to provide a general overview of the main characteristics and to highlight significant differences among the alternatives. The alternatives description will also address SEPA objectives.

**4.2.3 Earth**

The consultant will evaluate prior EIS documents for potential incorporation by reference or adaptation into the current EIS. Areas of review are anticipated to include the topography and soils found in the County, naturally occurring asbestos, and the areas subject to geologic hazards including erosion, landslides, liquefaction, and other hazards. The identification of geologic conditions and hazards will be based upon Critical Areas Ordinance maps and other available resources. A comparison of growth scenarios and land use alternatives to the location of the sensitive or hazard areas will be made and a discussion of the level of effectiveness of critical area and building regulations will be provided. Mitigation measures to avoid, minimize or rectify impacts will be identified as appropriate.

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**4.2.4 Air Quality / Climate**

The air quality / climate analysis will outline requirements of federal, state, and regional air quality regulations, including regulations relating to greenhouse gas emissions, for the proposed alternatives. The consultant will reference previous environmental documentation, applicable regulations, and air quality status of the county. The analysis will summarize air-monitoring data at continuous monitoring stations based on Northwest Clean Air Agency data. Existing emission inventories of selected pollutants, including greenhouse gas emissions, will be summarized if available. The EIS will qualitatively compare the alternatives' potential to contribute to emissions, including greenhouse gas emissions, based on an order of magnitude comparison of vehicle miles traveled (VMT) model output through Task 5, contributing land uses and other relevant factors.

**Climate**

A summary of current climate change programs applicable to the county, cities, and/or region will be summarized. The impacts of climate change, as set forth in climate model projections and scenarios, on existing and future land use will be analyzed. Specifically, analyze natural hazards created or aggravated by climate change, including sea level rise, landslides, flooding, drought, heat, smoke, wildfire, and other effects of changes to temperature and precipitation patterns. Mitigation measures to avoid, minimize or rectify impacts will be identified.

**4.2.5 Water Resources**

The consultant will summarize existing conditions regarding water quantity and water quality based on available County and State inventories and analyses of critical areas. The consultant will review drainage, flooding, and storm water run-off in the County and seven cities and provide guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state. The potential for flooding will be evaluated in relation to the UGA and UGA Reserve alternatives. Specifically, the alternatives will include modifying UGA boundaries for Everson, Ferndale, Nooksack, and Sumas to lessen the impact of flooding on future urban development. The consultant will prepare an impact analysis of alternatives at a programmatic level using order of magnitude analysis (e.g., broad estimates of impervious surfaces based on acres by class and typical impervious surfaces associated with the use category). Mitigation measures to avoid, minimize or rectify impacts will be identified. No modeling is included in the scope of services.

**4.2.6 Plants and Animals**

Plant and animal habitat, with an emphasis on threatened and endangered species, and existing salmon recovery efforts will be described based on existing County and State published sources. The consultant will qualitatively address common impacts due to habitat alteration or habitat loss due to increased population and employment growth, comparing the land use alternatives in an order-of-magnitude fashion. Mitigation measures to avoid, minimize or rectify impacts will be identified.

**4.2.7 Land and Shoreline Use**

The land and shoreline use affected environment section will generally describe land use patterns in the county, including a description of location and distribution of urban, rural, and resource land uses. Patterns of development within UGAs will be documented, in accordance with RCW 36.70A.130(3)(a)), which was amended by Engrossed Substitute Senate Bill 5593 in 2022. Potential land use impacts will be identified at a programmatic level for each of the alternatives including changes in activity levels, intensity of development, urban/rural land use patterns, land use compatibility, and land capacity to accommodate the densities proposed. Mitigation measures to avoid, minimize or rectify impacts on land and shoreline uses, including on urban, rural and resource lands, will be identified.

**4.2.8 Plans and Policies**

The EIS will describe the policy and regulatory context in the County. The impact analysis will evaluate the internal and external consistency of the proposed alternatives. Internal consistency will focus on the Comprehensive Plan

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update and proposed alternatives in the context of the County’s plans and regulations (including the Whatcom County Climate Action Plan). External consistency with relevant local, regional, and state plans and policies including GMA Goals, Shoreline Management Act goals and requirements, Countywide Planning Policies, and local comprehensive plans will also be included.

**4.2.9 Population, Housing and Employment**

The EIS will assess impacts of the land use alternatives on population, housing, and employment in the County including growth rates, land capacity in relation to growth projections, jobs/housing balance, adequate housing to accommodate existing unmet needs and projected population growth, and related issues. Mitigation measures to avoid, minimize or rectify impacts will be identified. This may include reference to mitigation measures proposed in sections addressing other elements of the environment, including the impact of regulations on land capacity for housing.

**4.2.10 Cultural Resources**

The consultant will evaluate prior EIS documents for potential incorporation by reference or adaptation into the current EIS. Areas of review are anticipated to include historic and cultural resources known to be present in the County based upon available State, County, and Tribal sources. Potential impacts will be discussed at a programmatic level. Mitigating measures, including federal, state, and local requirements, will be identified as appropriate.

**4.2.11 Transportation**

Analysis described under Task 5 will be incorporated into the Draft EIS. Transportation inventory and existing conditions analysis results will be incorporated into the affected environment section. Impacts will be identified through analysis of future conditions for each of the land use alternatives, and will primarily be based upon multi-modal LOS analysis results assuming County multi-modal LOS standards. The consultant will use WCOG Model output, mode share, and/or other appropriate information to generate multi-modal LOS results. Mitigation measures to avoid, minimize or rectify impacts will be identified. Mitigation will include transportation improvement projects identified to address deficiencies over the planning period (through the year 2045). The mitigation section will also describe potential options under GMA for additional revenue sources, revisions to LOS/concurrency standards, and/or land use that could be implemented to ensure a balanced transportation plan that supports land uses proposed.

**4.2.12 Public Services and Utilities**

The Public Services and Utilities section will address public facilities, public services, and private utilities including:

- Law Enforcement
- Fire and Emergency Medical Services
- Parks and Recreation
- Schools
- Water
- Wastewater
- Stormwater
- Solid Waste
- Power, Gas, and Telecommunication Utilities

The affected environment analysis will be based on existing or proposed County, city, special districts, and private utility providers’ plans, and will generally describe the services provided and service areas. It will also include an analysis of current levels of service (where applicable) and capacity. The impact analysis will include future demand projections for public facilities and services, and compare these projections to adopted level of service standards when applicable. Mitigation measures to avoid, minimize or rectify impacts will be identified.

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**4.3 Prepare Draft EIS**

The consultant will prepare a revised Draft EIS incorporating County and other agency comments authorized by the County, and will provide a preliminary version for staff to confirm that the comments have been incorporated as appropriate prior to publication as a Public Draft EIS.

**4.4 Prepare Final EIS**

The consultant will compile and prepare a Final EIS based on tasks 4.4.1 to 4.4.3.

**4.4.1 Review Comments Received on Draft Plan/EIS**

At the close of the comment period, the consultant will receive from the County all public and agency comments received on the Draft EIS. The consultant will assign a comment number to each individual comment and provide a mark-up copy of the comments with comment numbers noted in the margin for County review.

The consultant, County staff and City staff will participate in meetings to (1) review the draft mark-up of comments prepared above, and (2) discuss the approach for responding to comments. The consultant will prepare responses to comments on the Draft EIS at the direction of the County.

The consultant will prepare a preliminary comments and responses section for County review. The consultant will conduct any necessary review of documents, coordinate with County staff as needed and prepare preliminary text for County review. One round of review of the preliminary comments and responses is assumed.

**4.4.2 Modified Alternative for Final EIS**

To support the Final EIS preparation a description of a modified alternative (for example a hybrid alternative) will be prepared by the consultant if determined necessary by the Whatcom County SEPA Responsible Official. The consultant will prepare a consistency analysis of the modified alternative with GMA goals for use in the Final EIS. The Final EIS will document how the modified alternative is within the range of the Draft EIS analysis.

**4.4.3 Preliminary and Public Drafts of Final EIS**

Following County review of the preliminary Final EIS, the consultant will meet with County staff to obtain final comments and prepare revisions as directed. The consultant will also respond to other agency comments authorized by the County. A print-check copy of the public review Final EIS will be provided to confirm requested changes have been made satisfactorily and, upon concurrence, the document will be printed and distributed by the County.

**Task 5: Transportation Model Analysis**

The Whatcom Council of Governments (WCOG) will supply transportation modeling services for the land use alternatives studied in the draft EIS and the additional modified alternative studied in the final EIS. The WCOG will estimate VMT (and VMT per capita) and multi-modal trips for each UGA alternative. The consultant will develop household, group quarter population and employment allocations by Transportation Analysis Zones (TAZ) under Tasks 1.6 and 2.6. The consultant will use model outputs of volumes supplied by the WCOG and determine appropriate multi-modal level of service (LOS) results for the 2023 base year and each 2045 land use alternative. The consultant will prepare SEPA or other planning analysis using WCOG output information, and will allow the WCOG to review a preliminary draft of the written results prior to developing public review drafts.

**5.1 Council of Governments (WCOG) Coordination**

The consultant will coordinate with the WCOG to ensure that population, household, and employment data developed by the consultant will be in the format required by the WCOG to run the transportation model.

**5.2 Base Model - Existing Conditions**

The consultant will use WCOG supplied information regarding the model results for “current conditions” and prepare a summary of base year (2023) conditions for use in the SEPA and planning process. Available planning level

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transportation studies or traffic counts that give context to the base year model results will be incorporated by the consultant where relevant.

**5.3 Transportation Analysis Zone Land Use Data**

For the no action and action alternatives, the consultant will convert the proposed land use to household and employment units, and allocate to TAZs defined in the WCOG travel demand forecasting model. WCOG staff will input the land use/socioeconomic information into the countywide travel demand forecasting model to develop traffic forecasts for each scenario.

**5.4 No Action Alternative Analysis**

The WCOG will test the No Action Alternative in the travel demand model. For transportation links that are part of the multi-modal concurrency/LOS analysis, the WCOG will provide link volumes, mode share, and/or other appropriate information allowing the consultant to prepare the volume to capacity (V/C) ratios and/or other appropriate metrics. The consultant will then prepare, in consultation with Whatcom County, recommended transportation improvements to address deficiencies.

**5.5 Action Alternatives Analysis**

The WCOG will test the Action Alternatives in the travel demand model. For transportation links that are part of the multi-modal concurrency/LOS analysis, the WCOG will provide link volumes, mode share, and/or other appropriate information allowing the consultant to prepare the volume to capacity (V/C) ratios and/or other appropriate metrics. The consultant will then prepare, in consultation with Whatcom County, recommended transportation improvements to address deficiencies over the planning period (through the year 2045).

**5.6 Sensitivity Analysis**

The WCOG may provide assistance in conducting a sensitivity analysis, which may involve developing proposed improvements or varying land use assumptions utilized in the transportation model. For transportation links that are part of the multi-modal concurrency/LOS analysis, the WCOG will provide link volumes, mode share, and/or other appropriate information allowing the consultant to prepare the volume to capacity (V/C) ratios and/or other appropriate metrics.

**5.7 Modified Alternative Analysis**

The WCOG will test one additional alternative for inclusion in the Final EIS. For transportation links that are part of the multi-modal concurrency/LOS analysis, the WCOG will provide link volumes, mode share, and/or other appropriate information allowing the consultant to prepare V/C ratios and/or other appropriate metrics. The consultant will then prepare, in consultation with Whatcom County, recommended transportation improvements to address deficiencies.

**Task 6: Housing Elements**

Develop background information and analysis necessary to address GMA housing element requirements consistent with RCW 36.70A.070(2) for County and city comprehensive plans (see 6.1 through 6.5 below). State Department of Commerce Housing Guidelines and spreadsheet-based tools will be duly considered when developing the housing information and analysis. Adapt the State’s spreadsheet-based tools to address unincorporated UGAs. Draft proposed revisions to the County Comprehensive Plan housing chapter to comply with GMA housing element requirements (see 6.6 below).

**6.1 Existing and Projected Housing Needs**

The consultant will provide an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to accommodate existing unmet needs and manage projected growth throughout the County (within each UGA and on land outside UGAs).

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**6.2 Housing Goals**

The consultant will review existing County and city comprehensive plan housing elements and recommend additional or revised model goals, policies, objectives, and mandatory provisions that jurisdictions can consider and adapt for the preservation, improvement, and development of housing, including single-family residences, and within an UGA boundary, moderate density housing options including but not limited to, duplexes, triplexes, and townhomes.

These recommendations will make adequate provisions for existing and projected needs of all economic segments of the community.

**6.3 Land Capacity for Housing**

The consultant will, in conjunction with the land capacity analysis, identify sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, single family housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within a UGA boundary, consideration of duplexes, triplexes, and townhomes.

**6.4 Displacement and Exclusion**

The consultant will identify County and city policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing. The consultant will identify policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions. The consultant will identify areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments. The consultant will identify anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing.

**6.5 Buildable Lands Report and Reasonable Measures**

The consultant’s recommendations relating to housing elements will include consideration of the review and evaluation (buildable lands) report and any reasonable measures identified. The housings element should link jurisdictional goals with overall county goals to ensure that the housing element goals are met.

**6.6 Draft Whatcom County Comp Plan – Housing Element Revisions**

The consultant will draft proposed revisions to the Whatcom County Comprehensive Plan housing chapter to comply with GMA housing element requirements.

**Task 7: Tribal Participation in Planning**

Assist the County and cities to implement the Tribal participation requirements of the GMA (Substitute House Bill 1717, approved by the State Legislature in 2022).

**7.1 Countywide Planning Policies**

Draft Countywide Planning Policies that address the protection of tribal cultural resources in collaboration with federally recognized Indian tribes consistent with RCW 36.70A.210(3)(i) and (4).

**7.2 MOA Development and Implementation**

Assist the County and cities to develop, adopt, and implement a memorandum of agreement (MOA) with federally recognized Indian tribes that voluntarily choose to participate in the planning process consistent with RCW 36.70A.040(8). The MOA will facilitate collaboration, participation, coordination, and cooperation in the planning process.

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**7.3 UGA and Land Use Coordination**

If a MOA is adopted pursuant to Task 7.2 above, the County, cities and tribes will coordinate their planning efforts for urban growth (pursuant to RCW 36.70A.110(1)) and other areas consistent with the terms outlined in the MOA.

**Task 8: Climate Change Response (GMA Amendments in ESSHB 1181)**

Assist the County and cities to integrate the climate response requirements of the GMA (Engrossed Second Substitute House Bill 1181, approved by the State Legislature in 2023) into the Countywide Planning Policies, Whatcom County Comprehensive Plan, Whatcom County development regulations, city comprehensive plans, and city development regulations. Review and consider the Washington State Department of Commerce’s *Climate Element Planning Guidance* and model element when drafting proposed comprehensive plan language and development regulation amendments.

**8.1 GMA Climate Change and Resiliency Goal**

Review the Countywide Planning Policies and County and city comprehensive plans and development regulations for compliance with the GMA’s Climate Change and Resiliency Goal (RCW 36.70A.020(14)). Conduct analysis, as appropriate, and recommend changes needed to comply with the GMA’s Climate Change and Resiliency Goal.

**8.2 Comprehensive Plan Land Use Elements**

Review County and city comprehensive plans for compliance with the new land use element requirements adopted in House Bill 1181 (RCW 36.70A.070(1)). Conduct analysis, as appropriate, and recommend changes needed to comply with the GMA’s land use element requirements. If any small city (e.g., Everson, Nooksack, or Sumas) is not required to modify its land use element under House Bill 1181, it will be at the option of that jurisdiction to determine whether or not the consultant will develop recommended changes.

**8.3 Comprehensive Plan Capital Facility Elements**

Review County and city comprehensive plans for compliance with the new capital facility element requirements adopted in House Bill 1181 (RCW 36.70A.070(3)). Conduct analysis, as appropriate, and recommend changes needed to comply with the GMA’s capital facility element requirements.

Assist the County and cities to identify all public entities that own capital facilities and gather information required by GMA by reviewing capital facility or system plans, emailing, and calling the staff of the public agencies. Document steps used for gathering or attempting to gather this information.

**8.4 Comprehensive Plan Utility Elements**

Review County and city comprehensive plans for compliance with the new utility element requirements adopted in House Bill 1181 (RCW 36.70A.070(4)). Conduct analysis, as appropriate, and recommend changes needed to comply with the GMA’s utility element requirements.

Assist the County and cities to identify all public entities that own utilities and gather information required by GMA by reviewing capital facility or system plans, emailing, and calling the staff of the public agencies. Document steps used for gathering or attempting to gather this information.

**8.5 Comprehensive Plan Transportation Elements**

Review County and city comprehensive plans for compliance with the new transportation element requirements adopted in House Bill 1181 (RCW 36.70A.070(6)). Conduct analysis, as appropriate, and recommend changes needed to comply with the GMA’s transportation element requirements, including development of multi-modal level of service standards. If any small city (e.g., Everson, Nooksack, or Sumas) is not required to modify its transportation element under House Bill 1181, it will be at the option of that jurisdiction to determine whether or not the consultant will develop recommended changes.



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**8.6 Comprehensive Plan Park and Recreation Elements**

Review County and city comprehensive plans for compliance with the new park and recreation element requirements adopted in House Bill 1181 (RCW 36.70A.070(8)). Conduct analysis, as appropriate, and recommend changes needed to comply with the GMA’s park and recreation element requirements. Conduct an evaluation of tree canopy coverage within urban growth areas.

**8.7 Comprehensive Plan Climate Change and Resiliency Elements**

Conduct analysis, as appropriate, and develop proposed new climate change and resiliency elements for the County and city comprehensive plans that comply with the GMA’s climate change and resiliency element requirements (RCW 36.70A.070(9)). If any small city (e.g., Everson, Nooksack, or Sumas) is not required to develop the greenhouse gas emissions reduction sub-element, it will be at the option of that jurisdiction to determine whether or not the consultant will develop that sub-element.

**8.8 Development Regulations to Implement Comprehensive Plans**

Review existing County and city development regulations for compliance with the comprehensive plan goals and policies related to climate response, developed to address House Bill 1181. Recommend changes needed for consistency with the GMA and County and city comprehensive plan goals and policies developed pursuant to Tasks 8.1 to 8.6 above.

**Task 9: The 40 Year UGA Planning Strategy**

The consultant will review each city, UGA, and UGA Reserve and recommend how these areas, and the regulations governing them, could be modified to provide an additional twenty-year supply of residential and employment capacity to support projected growth from 2045-2065 (initial growth projections for 2045-2065 will be developed by the consultant). In order to facilitate current and future planning efforts relating to the additional twenty-year projections, the consultant will assist with the identification of planning, development regulation changes, and lands appropriate to be included within the UGA Reserves using the guidance in RCW 36.70A.110.

**Task 10: Project Management/Periodic Update Checklists**

This task includes project management activities including progress reports, invoicing, schedule, overall coordination, and preparing Periodic Update Checklists.

**10.1 Progress Reports and Invoicing**

Once a quarter, the consultant will provide County staff with an activity report that highlights services provided and accomplished in the prior quarter, identifying services to be provided, and listing any outstanding issues to be addressed.

Billings will be provided in accordance with the contract requirements.

**10.2 Schedule**

The consultant and County staff will assess project progress and discuss actions necessary to ensure that the project remains on schedule and within budget.

**10.3 Consultant and County/City Team Meetings and Conferences**

The consultant, County, and two city representative (selected by the City/County Planner Group) will hold virtual meetings and/or conference calls as necessary to ensure the project remains on-track. These meetings are in addition to the individual task meetings specified above.

**10.4 Periodic Update Checklists**

The State Department of Commerce has developed Periodic Update Checklists that must be submitted by jurisdictions that receive State planning grants. The consultant will prepare a preliminary draft “Periodic Update

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Checklist for Full-Planning Counties” for the County. The consultant will prepare a preliminary draft “Periodic Update Checklist for Full-Planning Cities” for each city. The County and cities will complete the final version of the Checklist for submittal to the State.

**Task 11: Equity, Environmental Justice, and Economic Security**

Equity, environmental justice, and economic security should be guiding principles throughout all chapters of the Whatcom County Comprehensive Plan and associated planning and regulatory documents.

**11.1 Comprehensive Plan Review**

Review the current Whatcom County Comprehensive Plan for consistency with the above priority that is set forth in County Council Resolution 2022-036. Identify implementation strategies and actions in Resolution 2022-036 (Exhibit A) that are not currently in the Comprehensive Plan.

**11.2 Comprehensive Plan Goals, Policies, and Text**

Recommend amendments to the Whatcom County Comprehensive Plan, as appropriate, to address the implementation strategies and actions in Exhibit A that are not currently in the Comprehensive Plan. Work with the Whatcom Racial Equity Commission and the Whatcom County Health and Community Services Department to refine the recommended amendments to the Comprehensive Plan.

**Task 12: Climate Change (County Resolution and Climate Action Plan)**

Incorporate climate change mitigation, adaptation, resilience, and greenhouse gas (GHG) emission reduction throughout the Comprehensive Plan.

**12.1 Comprehensive Plan Review**

Review the current Whatcom County Comprehensive Plan for consistency with the above priority that is set forth in County Council Resolution 2022-036 and the Whatcom County Climate Action Plan. Identify implementation strategies and actions in Resolution 2022-036 (Exhibit A) and in the Whatcom County Climate Action Plan that are not currently in the Comprehensive Plan, including retention and restoration of tree canopy in unincorporated Whatcom County.

**12.2 Comprehensive Plan Goals, Policies, and Text**

Recommend amendments to the Whatcom County Comprehensive Plan, as appropriate, to address the implementation strategies and actions in Exhibit A and the Whatcom County Climate Action Plan that are not currently in the Comprehensive Plan. Work with the Whatcom County Climate Impact Advisory Committee to refine the recommended amendments to the Comprehensive Plan.

**12.3 Whatcom County Greenhouse Gas Inventory**

Review and incorporate, as appropriate, information from the updated *Whatcom County Greenhouse Gas Inventory* (separate RFP) into the Whatcom County Comprehensive Plan.

**Task 13: Habitats for Fish and Wildlife**

Promote the protection and restoration of healthy habitats for fish and wildlife throughout the Comprehensive Plan.

**13.1 Comprehensive Plan Review**

Review the current Whatcom County Comprehensive Plan for consistency with the above priority that is set forth in County Council Resolution 2022-036. Identify implementation strategies and actions in Resolution 2022-036 (Exhibit A) that are not currently in the Comprehensive Plan, including a culvert inventory, schedule for culvert elimination or replacement, and a framework and strategy for achieving net ecological gain of salmon and other

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aquatic species habitat for all public projects and a voluntary incentive driven framework and strategy for private projects.

**13.2 Comprehensive Plan Goals, Policies, and Text**

Recommend amendments to the Whatcom County Comprehensive Plan, as appropriate, to address the implementation strategies and actions in Exhibit A that are not currently in the Comprehensive Plan. Work with the Whatcom County Marine Resources Committee, WRIA 1 Salmon Recovery Staff Team, Whatcom County Public Works (Natural Resources Division) staff and Washington Department of Fish and Wildlife, Lummi Nation, and Nooksack Indian Tribe to refine the recommended amendments to the Comprehensive Plan.

**Task 14: Economic Security and Affordable Housing**

Collaboratively work towards economic security and affordable housing without sacrificing environmental health and public safety.

**14.1 Comprehensive Plan Review**

Review the current Whatcom County Comprehensive Plan for consistency with the above priority that is set forth in County Council Resolution 2022-036. Identify implementation strategies and actions in Resolution 2022-036 (Exhibit A) that are not currently in the Comprehensive Plan.

**14.2 Comprehensive Plan Goals, Policies, and Text**

Recommend amendments to the Whatcom County Comprehensive Plan, as appropriate, to address the implementation strategies and actions in Exhibit A that are not currently in the Comprehensive Plan. Work with the Whatcom County Business & Commerce Advisory Committee and the Housing Advisory Committee of Whatcom County to refine the recommended amendments to the Comprehensive Plan.

**Task 15: Agriculture, Food System, and Food Security**

Support a thriving local agriculture and food system economy and food security, considering the impacts of climate change on agriculture as well as equity and housing needs of farmworkers.

**15.1 Comprehensive Plan Review**

Review the current Whatcom County Comprehensive Plan for consistency with the above priority that is set forth in County Council Resolution 2022-036. Identify implementation strategies and actions in Resolution 2022-036 (Exhibit A) that are not currently in the Comprehensive Plan.

**15.2 Comprehensive Plan Goals, Policies, and Text**

Recommend amendments to the Whatcom County Comprehensive Plan, as appropriate, to address the implementation strategies and actions in Exhibit A that are not currently in the Comprehensive Plan. Work with the Whatcom County Agricultural Advisory Committee and the Whatcom County Food System Committee to refine the recommended amendments to the Comprehensive Plan.

**Task 16: Forests, Timber Economy, and Healthy Ecosystems**

Build resilience to climate change in forests that enables both a thriving timber economy and healthy sustainable forest ecosystems for wildlife, carbon sequestration and storage, production and storage of cool, clean water, and environmentally safe recreation.

**16.1 Comprehensive Plan Review**

Review the current Whatcom County Comprehensive Plan for consistency with the above priority that is set forth in County Council Resolution 2022-036. Identify implementation strategies and actions in Resolution 2022-036 (Exhibit A) that are not currently in the Comprehensive Plan.

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**16.2 Comprehensive Plan Goals, Policies, and Text**

Recommend amendments to the Whatcom County Comprehensive Plan, as appropriate, to address the implementation strategies and actions in Exhibit A that are not currently in the Comprehensive Plan. Work with the Whatcom County Forestry Advisory Committee, Climate Impact Advisory Committee, and Washington State Department of Natural Resources to refine the recommended amendments to the Comprehensive Plan. This should include consideration of future development pressures and determining a minimum number of working forest lands required to sustain a thriving local economy.

**Task 17: Natural Hazards Mitigation and Emergency Response**

More thoroughly consider impacts of climate change, equity, and economic security in relation to natural hazards mitigation and emergency response.

**17.1 Comprehensive Plan Review**

Review the current Whatcom County Comprehensive Plan for consistency with the above priority that is set forth in County Council Resolution 2022-036. Identify implementation strategies and actions in Resolution 2022-036 (Exhibit A) that are not currently in the Comprehensive Plan.

**17.2 Comprehensive Plan Goals, Policies, and Text**

Recommend amendments to the Whatcom County Comprehensive Plan, as appropriate, to address the implementation strategies and actions in Exhibit A that are not currently in the Comprehensive Plan. Work with the Flood Control Zone District Advisory Committee, County Geologist, and Washington State Department of Natural Resources to refine the recommended amendments to the Comprehensive Plan.

**Task 18: Urban Growth Areas**

Analyze the use of, and restrictions to, UGAs within the County to avoid unintended incentives to build outside of UGAs.

**18.1 Growth Patterns**

Evaluate and document how growth patterns may have been altered from historic patterns in light of socioeconomic changes, climate change, and housing affordability challenges and what impact this should have on future planning.

**18.2 Comprehensive Plan Review**

Review the current Whatcom County Comprehensive Plan for consistency with the above priority that is set forth in County Council Resolution 2022-036. Identify implementation strategies and actions in Resolution 2022-036 (Exhibit A) that are not currently in the Comprehensive Plan.

**18.3 Comprehensive Plan Goals, Policies, and Text**

Recommend amendments to the Whatcom County Comprehensive Plan, as appropriate, to address the implementation strategies and actions in Exhibit A that are not currently in the Comprehensive Plan. Work with the cities and the Whatcom County Planning and Development Services Department to refine the recommended amendments to the Comprehensive Plan.

**Task 19: Wetland Mitigation**

Maximize the environmental benefits of wetland mitigation and consider opportunities to increase development yield in urban areas by establishing off-site wetland mitigation areas outside of cities.

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**19.1 Comprehensive Plan Review**

Review the current Whatcom County Comprehensive Plan for consistency with the above priority that is set forth in County Council Resolution 2022-036. Identify implementation strategies and actions in Resolution 2022-036 (Exhibit A) that are not currently in the Comprehensive Plan.

**19.2 Comprehensive Plan Goals, Policies, and Text**

Recommend amendments to the Whatcom County Comprehensive Plan, as appropriate, to address the implementation strategies and actions in Exhibit A that are not currently in the Comprehensive Plan. Work with Whatcom County Planning and Development Services and Whatcom County Public Works staff with expertise in wetland mitigation and the Washington State Department of Ecology to refine the recommended amendments to the Comprehensive Plan.

**Task 20: Countywide Mineral Resource Lands Assessment**

Conduct a countywide assessment of Mineral Resource Lands (MRLs), identify land that could be considered for designation as commercially significant MRLs to meet future demand, compatible with water resources, agricultural lands, forest lands and other GMA goals pursuant to Comprehensive Plan Policy 8R-1.

**20.1 MRL Alternatives**

Formulate MRL designation alternatives in the environmental review (e.g., EIS) process. The alternatives in the Draft EIS will include, but not be limited to:

- The no action alternative; and
- The “Localized Expansion – SMAC recommendation within ½ mile of existing MRL” alternative (MRL White Paper – April 21, 2021, Figure 6), excluding UGAs.

**Task 21: Whatcom County 20-Year Capital Facilities Plan Update**

Update the Whatcom County 20-Year Capital Facilities Plan (Whatcom County Comprehensive Plan, Appendix E) in accordance with RCW 36.70A.070(3).

**21.1 Inventory of Current Facilities**

Review existing capital facility plans and coordinate with County and non-County representatives, as appropriate, to update the inventory of existing capital facilities owned by public entities, including green infrastructure.

**21.2 Forecast of Future Needs**

Review existing capital facility plans and coordinate with County and non-County representatives, as appropriate, to update the forecast of future capital facility needs.

**21.3 Capital Projects and Funding**

Review existing capital facility plans and coordinate with County and non-County representatives, as appropriate, to update planned capital projects and funding.

**21.4 County Revenue Projections**

Update County Revenue Projections, estimating future revenues projected for the Plan’s 2026-2045 time period, in year of expenditure dollars. Use the existing Whatcom County 20-Year Capital Facilities Plan “Chapter 16 – County Revenue Projections” as a template.

**Task 22: Review County Subarea Plans**

Review Lummi Island, Urban Fringe, Birch Bay Community Plan, Foothills, and Point Roberts subarea plans to identify any inconsistencies with the Whatcom County Comprehensive Plan.

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**22.1 Review for Inconsistencies**

Review the five subarea plans to identify inconsistencies with the Whatcom County Comprehensive Plan (as amended in the 2025 update process).

**22.2 Document Inconsistencies**

Create a report documenting the identified inconsistencies and recommending changes to the five subarea plans to remedy the inconsistencies.

**22.3 Urban Fringe Subarea Plan**

Review the Bellingham Urban Fringe Subarea Plan. Identify text, goals, and policies that are already addressed in the Whatcom County Comprehensive Plan. Identify text, goals, and policies that are not addressed in the Whatcom County Comprehensive Plan.

**Task 23: Columbia Valley UGA – Planned Light Impact Industrial**

**23.1 Review Buildable Lands Report – Columbia Valley UGA Profile**

Review the Buildable Lands Report 2022 Whatcom County Review and Evaluation Program (July 7, 2022, Revised February 27, 2023), Columbia Valley UGA profile. Specifically, review sections of the profile relating to employment and reasonable measures in the Columbia Valley UGA.

**23.2 Foothills Subarea Plan, Chapter 12, Policy CV1-D**

Address Foothills Subarea Plan Policy CV1-D specifically, identifying traffic impacts, infrastructure/utility/service needs, and appropriate mitigation measures associated with a land use alternative that would rezone the Planned Light Impact Industrial area north of Limestone Rd. in the Columbia Valley UGA from Rural Forestry to Light Impact Industrial. This analysis may be incorporated into the environmental impact statement, if appropriate.

**Task 24: Essential Public Facilities**

Address changes made to the GMA’s essential public facilities requirements (RCW 36.70A.200) in the Whatcom County Comprehensive Plan and development regulations. These changes relate to “community facilities” as defined in RCW 72.05.020 (group care facility or County detention facility operated for juveniles committed to the Department of Children, Youth, and Families). These changes were adopted by the State Legislature in 2021 in Engrossed Substitute Senate Bill 5118.

**24.1 Comprehensive Plan Review and Recommendations**

Propose amendments to Whatcom County Comprehensive Plan Chapter 2, Essential Public Facilities text and policies for siting for “community facilities” in compliance with the GMA.

**24.2 Development Regulation Review and Recommendations**

Propose amendments to the Whatcom County development regulations (e.g., Zoning Code) for siting for “community facilities” in compliance with the GMA.

**Task 25: Open Space within and between UGAs**

Identify open space corridors within and between urban growth areas, including lands useful for recreation, wildlife habitat, trails, and connection of critical areas.

**25.1 Comprehensive Plan Review**

Review the current Whatcom County Comprehensive Plan goals, policies, and Map 2-3 “Open Space Areas and Corridors” for consistency with the GMA’s open space provisions of RCW 36.70A.160.

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**25.2 Consultation with Cities**

Consult with cities regarding Whatcom County Comprehensive Plan goals, policies, and Map 2-3 in relation to open space within and between existing and proposed UGAs.

**25.3 Comprehensive Plan Goals, Policies, and Map**

Recommend amendments to the Whatcom County Comprehensive Plan goals, policies, and/or Map 2-3, if appropriate, to address the RCW 36.70A.160 in relation to existing and proposed UGA boundaries.

**Task 26: Limited Areas of More Intensive Rural Development (LAMIRDs)**

Review the Whatcom County Comprehensive Plan and development regulations for consistency with and enhancement opportunities provided under Second Engrossed Substitute Senate Bill 5275, passed by the State Legislature in 2022, relating to LAMIRDs (amended RCW 36.70A.070(5)).

**26.1 Comprehensive Plan Review and Recommendations**

Review the current Whatcom County Comprehensive Plan goals, policies, text, and map relating to LAMIRDs for consistency with and enhancement opportunities provided under Second Engrossed Substitute Senate Bill 5275. Make recommendations to amend Comprehensive Plan provisions relating to LAMIRDs.

**26.2 Development Regulation Review and Recommendations**

Review the current Whatcom County development regulations and map relating to LAMIRDs for consistency with and enhancement opportunities provided under Second Engrossed Substitute Senate Bill 5275. Make recommendations to amend development regulations relating to LAMIRDs.

**Task 27: Public Participation Plan**

Develop and assist implementing a public participation plan for the 2025 Whatcom County Comprehensive Plan update, UGA review, and development regulation update.

**27.1 Plan Development**

Develop a public participation plan for Whatcom County in accordance with the Growth Management Act and County-wide Planning Policies including participation of vulnerable populations and overburdened communities as required by RCW 36.70A.020 (amended in 2023 by the State Legislature). When developing the public participation plan for Whatcom County, review public participation plans from other counties in Washington relating to periodic updates for best practices. Include public education and outreach tools to encourage informed and effective public input. These will include an easily accessible web page featuring a process flow chart.

**27.2 Plan Implementation**

Assist Whatcom County in implementing the Public Participation Plan, particularly by identifying and facilitating participation by vulnerable populations and overburdened communities throughout the entire process.