

From: [Linda T](#)
To: [PDS Planning Commission](#)
Cc: [Darcy Jones](#); [Gary Davis](#); [Mark Schramer](#)
Subject: RE: Land Capacity - from BIAWC
Date: Wednesday, December 09, 2015 12:23:05 PM

A word, please, about Gary Davis' comments regarding buffers and density calculations in land capacity analyses. I got a call asking for clarification RE this in conjunction with my letter, so here you go:

Mr. Davis sent the e-mail below in reaction to Darcy Jones' Nov. 18 letter suggesting that if buffers are included in a land capacity analysis as "buildable land," we don't get an accurate density estimate.

I disagree with the assumption in Mr. Davis' message, below, that not taking buffers into account (not deducting buffer areas from the "buildable" land) is the correct thing to do.

Mr. Davis says "per our methodology" we (the county?) shouldn't have subtracted buffers in figuring land capacity "because typically buffer area can be used to calculate density." Typically buffer land may have included when estimating potential density. But the fact that it has been done before does not make it advisable. If you can't ignore buffers at the permit counter, if you can't build on that land – why would you include those areas when estimating land capacity?

The recent perfect example of this is Bellingham's Nov. 9 annexation of 163.5 acres in the E. Bakerview/Mt. Baker Highway area. What happened there supports the argument that the effect of buffers SHOULD be taken into consideration. Without taking buffers into account, the DNR land in that annexation was figured at 26.5 buildable acres. When the effect of buffers *was* taken into account (after somebody pointed out this problem at a public hearing), the DNR land in that annexation was refigured at only 1.5 buildable acres. THE CITY REVISED ITS FIGURES IN THE ANNEXATION, lowering its estimate to 1.5 acres – because that's what actually can be developed. The potential dwelling units for that annexation were officially revised from 387 (when the effect of buffers was ignored, and buffer land was included in the density equation) to a maximum of 95-198 dwelling units once buffers were taken into account and that land was dropped from the density equation. Proof that buffers need to be taken into account to get an accurate density count. Which I hope is what we're striving for.

Part of the confusion with the e-mail below is the language. The term "adding back the buffer area" at the end of the first paragraph threw me for a minute. I initially thought "adding back the buffer area" meant adding the effect of the buffers back into the equation – realizing that you can't build there and dropping that land from the density calculation. But I believe Mr. Davis meant just the opposite – adding the buffer area back *into the amount of buildable land* – pretending that you *can* build on it – should "correct the undercount of population capacity in the LAC." By putting buffer areas back into the usable land estimate, you do get a higher density count ("correct the undercount"). But you're not "correcting an undercount," you're creating an artificially high density estimate (by including land cannot be used for residences).

Thank you,

Linda Twitchell

Government Affairs Director

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From: Gary Davis

Sent: Friday, November 20, 2015 8:27 AM

To: darcy@jonesengineers.us

Cc: rsepler@cob.org; PDS_Planning_Commission; Aucutt, Gregory R.; CBehee@cob.org; Mark Personius; Matt Aamot

Subject: RE: Land Capacity - City of Bellingham Comprehensive Plan Update 2016

Darcy, we've resolved the specific issue you pointed out on the DNR parcels. After your last email, I coordinated with the City to find out what caused the inconsistency on the DNR parcels. I found out that in the LCA we were subtracting a 150' wetland buffer area that was part of the updated wetland data the City had sent us in June, but per our methodology we shouldn't have subtracted buffers for residential capacity calculation, because typically buffer area can be used to calculate density. When we removed the buffers from the critical areas subtraction, that left about 26.5 acres of "developable" area for calculation purposes – which I confirmed aligns with the City's most recent developable acreage figures (they correctly didn't subtract the buffer). This buffer issue affected a few residential parcels near Northwest Drive as well. Adding back the buffer area should correct the undercount of population capacity in the LCA.

This prompted us to check all the CAO and buffer subtractions in the unincorporated areas and we've made some additional updates on both the residential and commercial/industrial lands, to make sure the CAO subtractions are based on the latest data supplied by the City. As a result of this review, future LCA estimates will reflect a slight increase of both the population and employment capacity.

Thank you for pointing out this inconsistency so it could be corrected. We are always working to make sure the LCA reflects the most recent and accurate inputs, and will continue to make adjustments as needed.

Gary Davis, AICP
Senior Planner
Whatcom County Planning and Development Services
360-778-5931

Note: All emails sent and received at this address are subject to public disclosure

From: Darcy Jones [<mailto:darcy@jonesengineers.us>]
Sent: Wednesday, November 18, 2015 5:44 PM
To: Gary Davis
Subject: FW: Land Capacity - City of Bellingham Comprehensive Plan Update 2016

Gary – I sent the attached letter to the City Planning Director, Mayor and County Planning Commission today. Please let me know if you would like to discuss.

Thank you,

Darcy Jones
Jones Engineers, Inc.

From: Darcy Jones [<mailto:darcy@jonesengineers.us>]
Sent: Wednesday, November 18, 2015 5:36 PM
To: 'Sepler, Rick M.'
Cc: 'mayorsoffice@cob.org'; 'ccmail@cob.org'; 'Bob Carmichael'; 'n-ishii@tw.caitac.co.jp';
Subject: Land Capacity - City of Bellingham Comprehensive Plan Update 2016

Mr. Sepler – I have prepared the attached letter for your review and consideration. Please let me know if you have any questions or would like to discuss the land capacity issues discussed in my letter.

Thank you,

Darcy Jones
Jones Engineers, Inc.