

The Blaine Urban Growth Area (UGA) A Recommendation to Whatcom County

Summary

The Growth Management Act (GMA) defines "Urban Growth Area" as lands designated by the county "for growth that makes intensive use of land for the location of buildings, structures, and impermeable surfaces."

Our Town. While this definition can be applied to the City of Blaine, it makes us a little uncomfortable. Those of us who live and work here don't see our city as an "Urban Growth Area"; or as "impermeable surfaces". We see Blaine as a unique place in a unique spot on this earth. For instance, Blaine would probably not fit in well if it were relocated to the north side of Bellingham. In fact, many of us find it hard to even describe Blaine as a "city", in the manner that most people envision cities as metropolitan urban centers. We think that Blaine can better be described as a "small town" on Drayton Harbor with a strong cultural heritage, a tight community, and one of the best 4th of July parades in small town America!



The community's vision of growth in Blaine is one that preserves many of qualities that have drawn people here. It is not a vision or rampant suburban sprawl nor does the town want to replicate the current pattern of undifferentiated growth that has emerged in many large-city urban growth areas. The town of Blaine is uniquely "Blaine" and would like to remain so as it grows.

Our UGA. Blaine recognizes that the current Urban Growth Area (UGA) surrounding town has a growth capacity that could, under several growth scenarios, accommodate 50 to 80 years of urban growth. Consequently, we recommend that the existing UGA be reduced in size to accommodate 20 year growth projections. We anticipate a significant reduction in the UGA.



However, we believe that an **incorporated "city" (UGA) like Blaine**, with a functioning municipal government, which is fully invested in urban infrastructure and urban

services, is the more appropriate location to allocate growth and should be given precedence over the unincorporated UGAs and rural areas of unincorporated Whatcom County.

Exhibit A

We believe that the County’s current allocation of high numbers of population to the unincorporated Birch Bay UGA is not consistent with the guidelines of the Growth Management Act and will have significant (negative) impacts to the growth and development of Blaine. We suggest that the County consider reallocating some of that projected growth to the incorporated cities of Whatcom County.

County Staff’s 20 Year Growth Projections & Allocations

The County Planning staff have provided Blaine with evolving growth projections as they have emerged and been clarified. These numbers represent an estimate of Blaine’s proportional share of the entire County’s projected 20 years of growth. This task has been a large undertaking and we appreciate the work they have done. The most recent, or phase II, projections for Blaine are:

County Staff Population Projections & Allocations

- Existing County Population: 199,000
- County’s Projected Population Growth for Whatcom County: 252,971
- Existing Blaine Population: 4,650 (5,754 with surrounding UGA)
- County’s Projected Population Growth for **Blaine: 3,720 additional people**

County Staff Employment Projections & Allocations

- Existing County employment base: 77,426 jobs.
- Existing Blaine employment base: 2,971 additional jobs.
- County’s Projected employment growth in **Blaine: 1,903 additional jobs**

Blaine’s Response

The City Council has held two public hearings and four study sessions to review, hear public testimony, and to clarify Blaine’s position on this 10 year UGA update undertaken by the County. Our response includes the following recommendations:

Population Projections & Allocations

Recommendation: We recommend the use of EIS Alternative Y – for population projections. However, because Blaine is an incorporated city, we believe that the appropriate population growth allocation for Blaine should be set higher than the 3,720 by County staff under alternative Y. We recommend a population projection of 4,700 additional people. This amounts to 7.5% of total county growth (61,971), up from the County’s estimated share of 6%.

	Cnty-Wide Existing Pop	Blaine Existing Pop	Cnty-Wide Pop Growth	Blaine Pop Growth	Blaine Pop Growth % of Cnty	Blaine Pop Total
Phase 2- County Staff Projections	191.000	5,754 w/UGA	61,971	3720	6.0% of growth	9473
Blaine Revised Recommendation	191,000	4667 (OFM)	252,971	4700	7.5%	9367

Exhibit A

Rationale: In April, when the City Council made their initial recommendation to the county, they reasoned that the County totals could remain constant with a corresponding reduction in the Birch Bay population projections. Again, we believe that an incorporated city, with a functioning municipal government that is fully invested in urban infrastructure and services is the more appropriate location to allocate population; Precedence should be given to cities in the allocation process.

The Town of Blaine has historically grown at 2.8 % annually over the last 10 years. In 2003 the Town adopted the Econorthwest population and employment forecast which projected a population of 7,942 by the year 2022. However, there are a number of additional factors that lead us to request a higher allocation number:

1. Blaine presently has three major residential development proposals under review that will result in well over 1500 new residences available for occupation and several more smaller proposals that have recently submitted.
2. The town of Blaine has two very different housing markets; the upscale retirement/second home market in Semiahmoo, and the range of "affordable" housing that is increasingly attracting families that are drawn to the "small town" environment that Blaine has to offer. While we have all seen a drop-off in building starts the last few years, we see many indicators of increased interest in Blaine as it builds its reputation as a very livable small coastal town strategically placed between two large metropolitan centers.
3. A critical factor in this discussion should be the availability of urban infrastructure and services. The Town of Blaine is currently constructing a \$30,000,000 wastewater treatment facility. Over the past 5 years the limited sewer capacity has had a dampening effect on growth. The completion of the plant next years will eliminate this factor.
4. Additionally, we have recently completed a \$200,000 infrastructure plan for the East Blaine planning area with plans to begin construction next year. The extension of infrastructure, particularly sewer lines, will trigger substantial interest in this East Blaine area.
5. Blaine' Planning & Public Works staff have recently begun to update our capital facilities plan and have initiated an infrastructure plan for the UGA and "at risk" residential pockets outside of the city limits that pose a risk to Drayton Harbors water quality.
6. Blaine's Planned Growth. We believe that the compelling issue here is planed growth and the necessary commitment to investment in infrastructure, urban low impact standards, and urban levels of service. These are required of any incorporated municipality and they are not cheap. As we plan for growth and make these mandatory improvements there is a subsequent rise in cost that is passed along to the end user. For instance, at a cost of 30 million dollars for the wastewater treatment facility, the city must be able to anticipate a long and stead revenue source to pay for it. The resulting increases have resulted in higher hookup charges and monthly fees. **More importantly the Public Works Director has used a minimum threshold of 2.6% annual growth to meet the plants annual costs.** Without anticipated growth, the existing community must pay higher and higher fees to cover the gap.

The problem with all of this is that developers often will find the most cost effective way... and location... to develop. And while it has sewer service, if the unincorporated Birch Bay UGA (with its 8,700 acres of land area) is less expensive to develop, without the costs and impact fees associated with urban standards & services, that is where a developer will be inclined to go. Thus the pattern of rapid suburban development begins.

Exhibit A

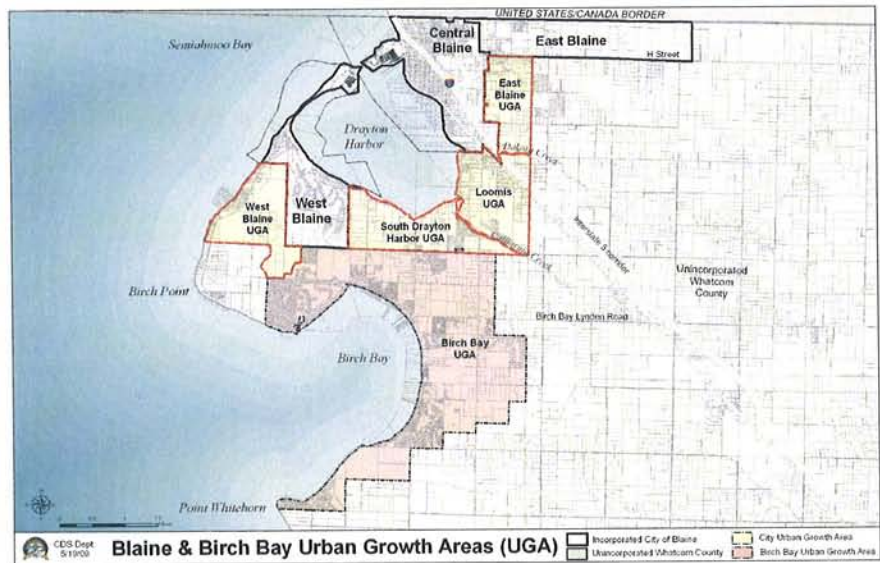
Unincorporated Birch Bay UGA Recommendation: We recommend that the County consider reducing the population allocated to the unincorporated Birch Bay UGA to a number that corresponds to the increase that we have suggested you reallocate to Blaine.

Rationale: While the work of the Birch Bay Steering Committee is admirable and it is clear that they and many more in Birch Bay have invested a great deal of time and thought into Birch Bay improvements, they are, nevertheless, only a committee and not a governing body. Their website contains this

- The Steering committee is:
 - not empowered by any official authority,
 - does not answer to any constituency and
- does not have any mechanism to enforce its recommendations

Birch Bay is a large unincorporated UGA of 8,700 acres comprised of large areas of undeveloped rural land and urban areas that butt up against Blaine’s UGA to the north.

It is important to point out that, while Blaine’s UGA is an area reserved for future growth through annexation (a rigorous, costly and complicated process) the Birch Bay UGA is not held to the same standard. It remains an unincorporated UGA that does not require annexation to grow, subject only to the County’s growth guidelines; essentially, a rural standard.



Birch Bay has **limited infrastructure** built to rural standards (roads, pedestrian sidewalks or walkways, stormwater facilities). Additionally, Birch Bay does not have many **essential public services** and facilities at an adequate urban standard to service the Birch Bay community (police and fire protection, park and recreations facilities, public library, community/senior center, schools). In fact, some of these services are provided by Blaine.

Despite these conditions the County has planned a residential growth rate of over 4,329 (down from phase I (alt y) projections of 6,000) people in Birch Bay over the next 20 years, while Blaine is only projected to grow by only 3,700.

UGA	2008 Population	Phase II County Staff Allocation	2031 County Allocated Total
Birch Bay UGA	5,290	4,329	9,619
Blaine UGA	4,667	3,720	8,370

We do not believe that the County’s current allocation of high numbers of population to the unincorporated Birch Bay UGA is consistent with the guidelines of the Growth Management Act. Equally important is the significant (negative) impact it could have to Blaine.

Exhibit A

Employment

Recommendation: Again, we recommend the use of Alternative Y – for employment projections. Blaine envisions greater employment opportunities in the manufacturing and retail commercial sectors. Increases employment in Blaine would allow more residences to reduce auto trips, thus, reducing traffic and environmental impacts.

We believe that the employment projections are within an acceptable range.

UGA Area	2008 employment	Phase II Blaine Requested	2031 Blaine Requested Total	Phase II County Staff Allocation	2031 County Allocated Total
Birch Bay UGA	436			489	925
Blaine UGA	2971	1,903	4,874	1,903	4,874

The town of Blaine has recently initiated an economic development initiative in the east Blaine commercial and industrial districts that will result in increased attraction to industry. This year we will build a major commercial collector street that will directly link the Manufacturing district with the Truck route. Additionally, we were working on a regional stormwater program that will encourage industrial development in Blaine. We believe that this initiative is part of the reason why we currently have four applications in for the construction of manufacturing plants.

Unincorporated Birch Bay UGA Recommendation: The employment allocation for Birch bay appears to have settled in at 489 new employees constituting 1.4% of the total employment growth in Whatcom County. We are comfortable with those numbers. However, until the Birch Bay community is able to incorporate, we recommend that those numbers remain low.

Rationale: Early drafts of the of the County's employment forecast projected Birch Bay's employment to grow at a large rate. We have taken issue with those early numbers. Our argument has been that this course of action encourages development and investment into unincorporated UGAs such as Birch Bay and Columbia Valley, rather than focusing development and investment into incorporated areas such as Blaine and nearby Ferndale.

Our belief and concern has been that this kind of allocation formula and corresponding land use policies can result in a pattern of high growth numbers in unincorporated Whatcom County and, certainly, economic hardship to businesses in Blaine.

County staff has responded that only a few years back, the County and Birch Bay undertook a planning effort that resulted in a Comprehensive Plan for the Birch Bay subarea. We participated in that process; attending two public hearings and providing written testimony on several occasions. Our position then, and now, is that the Birch Bay plan allows too much growth, to fast, and without consideration of the impact it will have on adjacent communities. We received no response from the County or the Birch Bay committee.

Birch Bay Summary

It is our position that responsible planning under the Growth Management Act should be visionary and project at least 20 years into the future. It appears that the Birch Bay projections and planning is predicated on past development patterns and outdated planning goals. **The town of Blaine has recognized its responsibility to reduce its UGA boundaries and undertake responsible planning for growth. We ask that the unincorporated UGA of Birch Bay be held to the same standard.**

Existing & Future Land Capacity

Recommendation: Our only comment is that the land use capacity analysis has been an exceedingly large and complicated undertaking. County staff have managed this effort and completed most of the work. While it is a good solid work, we would like the opportunity to take a more in-depth look at it during the 2011 comprehensive planning process and reserve the opportunity to work with the county to correct any errors, omissions or other variables that may arise during the review.

Blaine's Urban Growth Area (UGA): The Next 20 years

Future UGA: How Much?

If the County's Growth and capacity figures are applied the result is a projection of additional land supply requirements (to accommodate 20-year growth):

- **Blaine Residential land supply requirements: 11 acres needed.**
- **Blaine's Com/Ind land supply requirements: 171 Acres needed.**

Residential land supply

Recommendation: With a projected growth of 4700 people in the next 20 years Blaine will need an addition approximately 200 acres of residential land in the UGA. These are preliminary numbers and staff will need to work together to achieve final figures.

Commercial and Industrial land supply

Recommendation: We concur with the land supply estimates. Our UGA boundary request (below) reflects these numbers.

Rationale: It is clear Blaine does not have enough commercial and Industrial land to accommodate even phase I projected employment in the next 20 years. We concur. Additionally, the City Council believes that Blaine will have a greater employment demand than projected by the County and would like to further review this issue during the 2011 Comprehensive Plan Update.

Future UGA: Where?

The first place we looked when we began to address this question was Blaine's Comprehensive Plan. Chapter 4, policy 1.4 provides some direction for the location of UGAs.

1.7 The Blaine Urban Growth Area (UGA) should include land:

- which is adjacent to the City Limits and currently developed at urban density;
- which is currently zoned for urban density development if other factors make it a logical area for growth. Land zoned UR4 is a higher priority for inclusion in the Urban Growth Area (UGA) than areas currently zoned R5A or R10A ;
- which is currently served by City water or electricity. Land within the proposed Blaine water service area that is currently served by the Birch Bay Water and Sewer District or Bell Bay Jackson is the second priority, if it meets other criteria for inclusion in the Urban Growth Area (UGA). Land which does not currently have water or sewer service is lowest priority;
- which can be most efficiently served by police, fire and emergency medical services and is in close proximity to schools and other public facilities;
- which can be most efficiently served by the existing transportation network without substantial new road construction or upgrade.

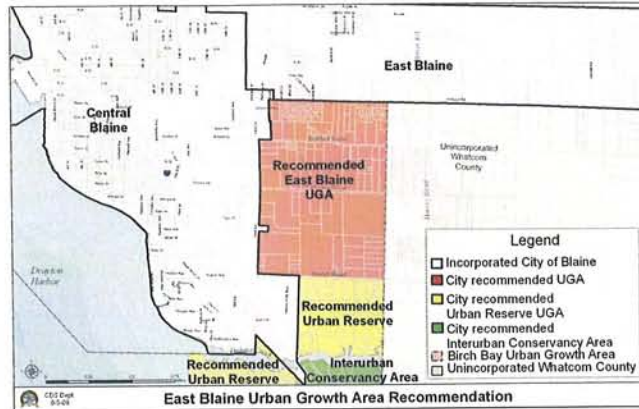
Exhibit A

Recommendation: We would like to retain 451 acres (352 net) of the present East Blaine UGA as indicated in the adjacent map.

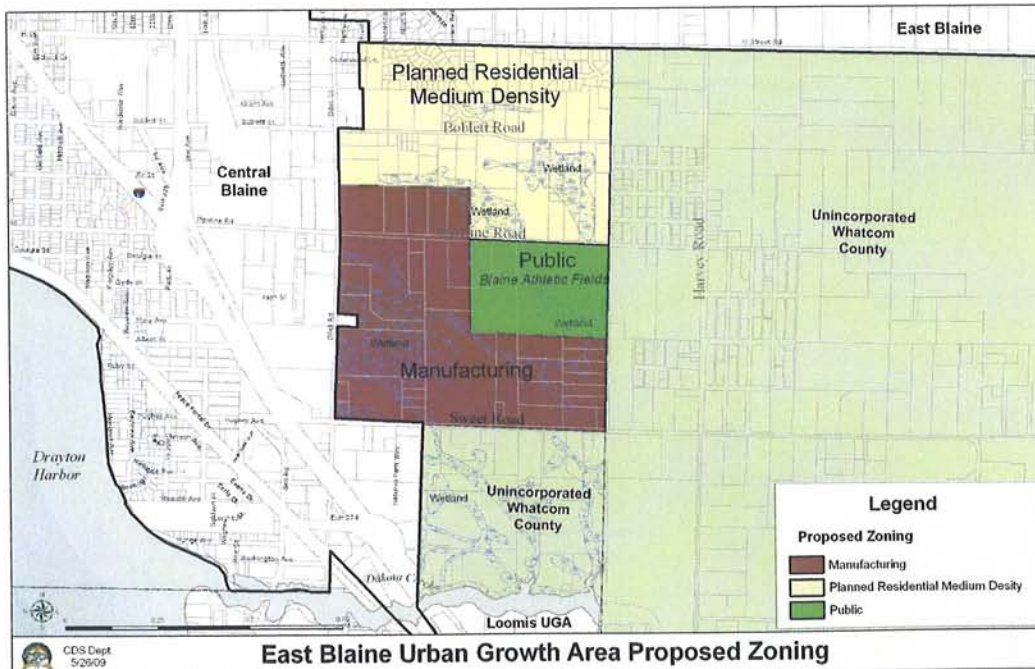
Rationale:

This 451 acre land area is located adjacent to Blaine’s city limits. The site has good access via Odell Street and currently is served by city electricity and water.

There currently are urban levels of residential development along the northern portion of the proposed UGA that are on individual septic systems. Additionally, there are almost as many additional lots that have not yet been, but could be developed. The soils in this area have very low permeability. Residential development using individual septic systems in this area clearly contributes to water quality degradation.



Recommendation: We recommend the retention of approximately 350 developable acres (of 451 total) in The East Blaine UGA. We propose that 144 acres be reserved for Industrial use and additional 160 acres be reserved for residential use. See adjacent map.



While preliminary, the table below provides a more detailed breakdown of the proportion of the UGA that we propose to be overlaid with manufacturing & residential zoning.

Exhibit A

East Blaine UGA Capacity under Proposed Zoning Designations				
Comp Plan Proposed Zoning	Count	Total Acres	CAO acres	Remaining acres
Manufacturing	39	200.6	56.9	143.8
PRM	139	192.8	32.2	160.6
PUB	3	58.6	11.3	47.3
Total	181	452.1	100.4	351.7
County (outside UGA)	27	140.0	41.9	98.2

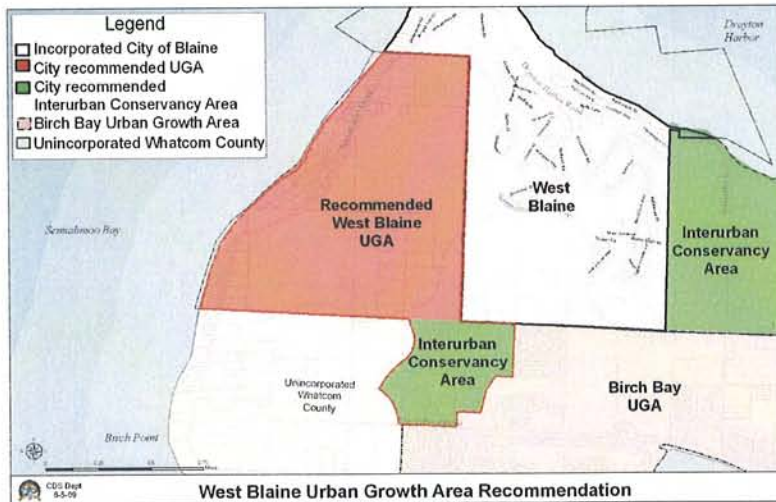
Recommendation: We recommend the retention of 725 acres of the 825 acres in the west Blaine UGA.

Rationale: The west Blaine UGA has been associated with the Semiahmoo Planned residential development for almost 20 years.

There are currently 119 residences located near the shoreline that are on individual septic systems and a road that is rural in character. There are almost 100 additional lots that have not yet been developed. This area would benefit from the urban standards that Blaine would apply.



Trillium Corporation owns most of the property in this planning area. The continued long term existence of this UGA has been an underlying assumption by Trillium Corporation.



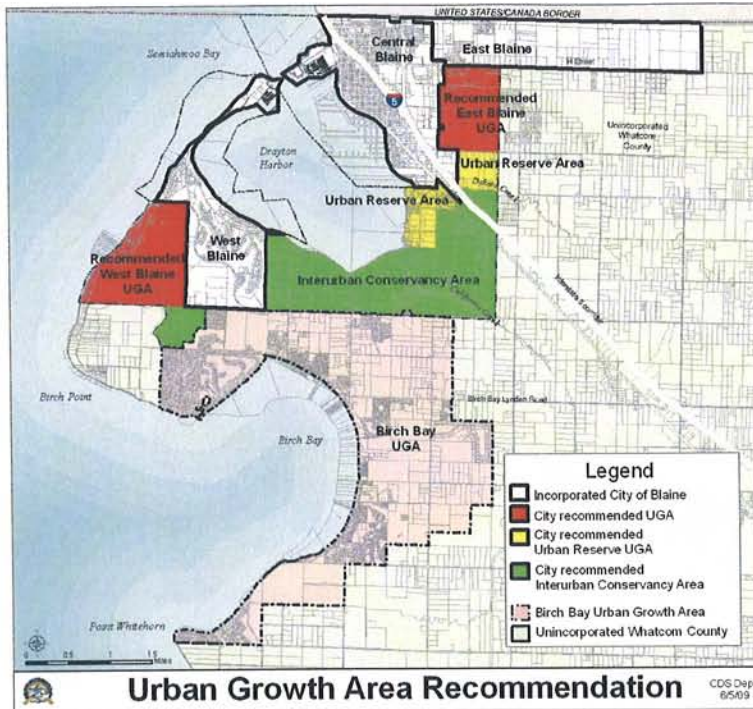
They own almost all the land to the east of Semiahmoo Drive, and have invested considerable time and money preparing the site for annexation and planned development. City officials have also made this assumption in its ongoing discussions and oversight of development in the Semiahmoo.

Finally, while the 20 year projections do not support the recommendation, it is important to clarify the difference between the West Blaine housing demographic from that of

central and east Blaine. Because the market area is national, even international, demand is driven to a greater extent by the supply of very specific residential & recreational conditions than by the condition of the economy.

Southern tip of the existing UGA. It is difficult to find any substantive rationale for recommending this tip as a future UGA. While we recognize the investment that has been made here, its designation as a UGA would not be consistent with the either the state guidelines or those of the Blaine Comprehensive plan.

Exhibit A



What do we do with the land removed from the UGA designation?

Study Area Recommendation:

We recommend that the southern portion of the East Blaine UGA and the northwesterly portion of the Loomis UGA be designated as Urban Reserve areas and request that they be reserved for further study during the 2011 Comp Plan update.

Rationale: Addressing the UGA boundary as part of a Comprehensive Plan allows local planners to consider the full range of options and impacts associated with long term growth and

annexation. The short timeline of this update has made it difficult to do so.

Interurban Conservancy Recommendation: We believe we have a unique proposal for the remainder of the land removed from UGA status. The Term "interurban" is defined as "relating to or connecting urban areas. We recommend that the County reserve the Loomis Trail and South Drayton Harbor UGAs for further study and joint planning.

Rationale: Most of the land area in these two UGA areas is located in the sensitive Drayton Harbor Watershed. The priority in this interurban greenbelt could be low impact development, a high quality of stormwater runoff and in a low density rural environment. The benefit could be a highly regarded rural area that, preserved, will create a rural buffer between the Blaine and Birch Bay communities and contribute to the improved water quality in Drayton Harbor.

This is a very unique area of Whatcom County; a rich and diverse ecosystem where both Dakota and California Creeks merge with Drayton Harbor. A collaborative environmental and recreational planning effort undertaken by Blaine & Birch Bay could help preserve and enhance this planning area for the enjoyment and use of future generations. With the a newly active Northwest Parks and Recreation District, a very active Blaine Parks Board and a pressing environmental imperative, the timing may be right to move forward with additional environmental initiative and, perhaps, even the identification and acquisition of greenbelts and recreation areas.

Rural lands outside of Blaine's UGA

Recommendation: We believe that the County should establish rural zoning in those land areas that are outside the adjusted UGA boundaries, with a maximum zoning density of one single family on one ten acre lot. Much of the land area removed from the UGA designation is located in the sensitive Drayton Harbor Watershed.

Exhibit A

The Blaine UGA & the 2011 Comprehensive Plan Update

Recommendation: The Town of Blaine and the County should jointly commit to revisit the UGA update during 2011 Comprehensive Plan update. We would appreciate it if we could sanction an agreement through an interlocal agreement. This could be signed and submitted to the County Council for approval at the time of their final review of the UGA update.

Issues that can to be addressed:

- Urban Reserve Areas
- Interurban Conservation Area
- Review of population & employment allocation.
- Extension of sewer & water to "at risk" areas.
- Drayton Harbor watershed

Recommendation: We believe that both Blaine and Birch Bay could greatly benefit from a joint Blaine & Birch Bay UGA planning process as part of their 2011 Comprehensive Planning update that will contribute to the unique urban character of each urban area and recommend that this also be included in the interlocal agreement.

Recommendation: We believe that the County should continue to engage and support the Birch Bay community in their sustained effort to incorporate and achieve a fully serviced urban community.

Thank you for the opportunity to provide our recommendations during this very important UGA updates process.

Respectfully,



Bonnie Onyon, Mayor
City of Blaine