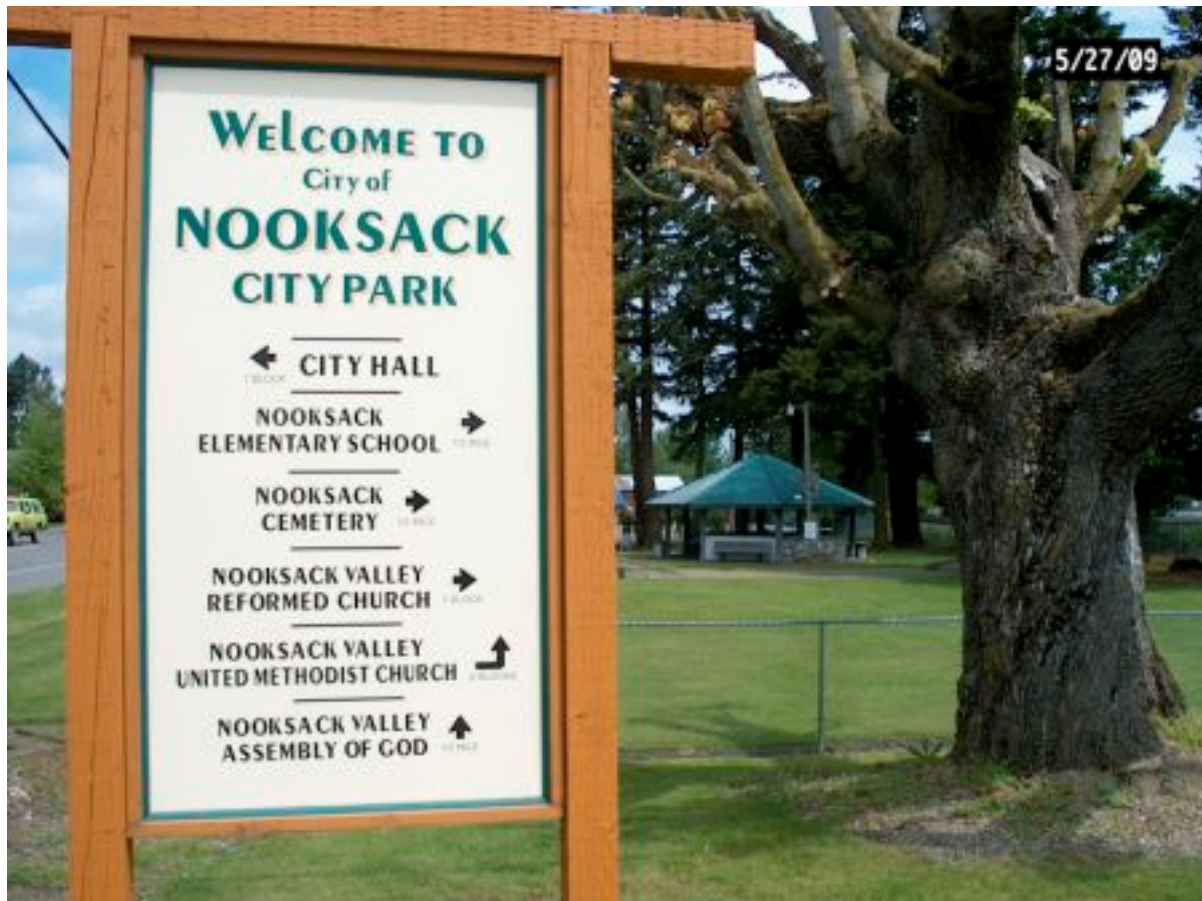


# CITY OF NOOKSACK URBAN GROWTH AREA PROPOSAL



**Prepared as part of:**

Whatcom County 10-Year Review of Urban Growth Areas

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## TABLE OF CONTENTS

INTRODUCTION.....	1
POPULATION ALLOCATION.....	1
Baseline Population.....	1
County Population Growth Alternatives.....	1
City Proposed Population Growth Allocation.....	1
Residential Land Capacity Results.....	1
Residential Land Capacity Modifications.....	2
LCA Methodology Issues.....	2
Residential Land Capacity Conclusion.....	4
EMPLOYMENT ALLOCATION.....	4
Baseline Employment Numbers.....	4
County Commercial/Industrial Employment Growth Alternatives.....	4
City Employment Growth Allocation.....	4
Commercial/Industrial Land Capacity Results.....	4
Commercial/Industrial Land Capacity Modifications.....	5
Commercial/Industrial Land Capacity Conclusion.....	5
UGA BOUNDARY MODIFICATIONS.....	5
CAPITAL FACILITIES.....	5
Water Service.....	5
Sewer Service.....	6
Other Capital Facilities and Services.....	6
CONCLUSION.....	6

## LIST OF MAPS

- Map 1: Nooksack Vicinity Map
- Map 2: Nooksack Zoning Map
- Map 3: Swift Creek Sediment Area

## **INTRODUCTION**

Over the past several months the City of Nooksack has been working in cooperation with Whatcom County and the other cities to address issues related to the 10-year review of urban growth areas (UGAs) required under the Growth Management Act. Although the County's compliance schedule provided very limited time for cities to prepare UGA proposals, in developing its proposal the City has done its best to build upon the work completed thus far in collaboration with the County while incorporating important local input. The Nooksack proposal also recognizes the substantial work that went into developing and refining the City's comprehensive plan over the past 12 years. This proposal is consistent with that plan and the vision for Nooksack that it provides.

This proposal document addresses the following components: population growth allocation, employment growth allocation, UGA boundaries and capital facilities. Map 1 shows the location of the current Nooksack City limits and existing UGA boundary as previously established by Whatcom County. Additional maps have been included where appropriate to illustrate important aspects of the proposal.

## **POPULATION ALLOCATION**

### Baseline Population

The official 2008 population for the City of Nooksack as established by the Washington State Office of Financial Management (OFM) was 1,090. Based on analysis completed by the County's consultant, the 2008 population of the Nooksack UGA (including both the area inside City limits and in the unincorporated portion of the UGA) was 1,137.

### County Population Growth Alternatives

As part of the 10-Year UGA review and associated environmental review, Whatcom County established a number of population growth alternatives for the Nooksack UGA. These alternatives range from a low of adding 636 people to a high of adding 1,159 people (Alternative Y).

### City Proposed Population Growth Allocation

Following a public hearing held on March 16, 2009 the Nooksack City Council chose a proposed population allocation for the year 2031 of 2,296 (Alternative Y). This alternative includes a net population increase of 1,159 through 2031. Such a growth pattern would be consistent with the 3.0% average annual growth rate experienced in Nooksack from 2000 through 2008 plus some additional population growth to accommodate a shift in growth from Bellingham and rural areas to the small cities as envisioned under Alternative Y.

### Residential Land Capacity Results

The County Land Capacity Analysis (LCA) utilized the City's current zoning within City limits and future zoning designations from the Nooksack comprehensive plan within the unincorporated portion of the UGA to determine residential land capacity. Map 2 shows

these current and future zoning designations. The results of the County's LCA indicate that the Nooksack UGA has an available residential capacity sufficient to accommodate an additional 1,329 people. When compared to the City's proposed population growth allocation (Alternative Y), the County results indicate a net surplus of 12 acres of residential land, which could accommodate an additional 170 people (in addition to those to be accommodated under Alternative Y). Generally these results support the conclusion that the residential portion of the Nooksack UGA is appropriately sized.

#### Residential Land Capacity Modifications

The County LCA results are based on a number of assumptions, some of which are discussed in this and the following section. In developing the LCA the County made some decisions regarding "assumed" densities for various residential zones. Although the County's LCA methodology clearly states that the starting point for assumed densities should be achieved densities if these values fit within reasonable limits, the County made a unilateral decision to use City minimum lot sizes to calculate average densities. Such an assumption is not mathematically valid since minimum lot sizes are not established as average lot sizes, but rather as lower limits; and, therefore such a calculation will tend to over-estimate residential land capacity. Recent development data in Nooksack indicate that the Nooksack residential zone had an achieved density of 4.17 units per acre; whereas, the County LCA utilized the minimum lot size to set an assumed density of 4.54 units per acre within City limits. While the relatively small difference between these two numbers does indicate that market forces are working well to maximize development density in Nooksack, the County assumption would overestimate the residential capacity by approximately 8%. The County has also used the theoretical maximum density based on minimum lot size) to set the assumed density in the residential portion of the unincorporated UGA, whereas the City supports using an assumed density of 4.5 units per acre as the assumed density in the unincorporated portion of the UGA (8% less than the theoretical maximum). . Substituting these slightly lower numbers into the LCA yields a residential land capacity sufficient to accommodate 1,255 additional people. This equates to a surplus of 7 acres, which is a net reduction of 5 surplus acres from the County's results.

#### LCA Methodology Issues

Although the City does not want to raise the following issues as being of major importance at this time, it is the City's perspective that the County's LCA methodology has a number of important shortcomings that tend to over-estimate residential land capacity. The issue that is of the greatest concern is that the LCA methodology did not analyze development potential on a parcel-by-parcel basis, but rather aggregated parcels that could be subdivided and then divided this total by the minimum lot size. In effect, this approach adds together all of the leftover fractions of potential dwelling units and counts them toward residential capacity. So, for example, in a zone requiring a minimum lot size of 10,000 square feet, and considering three parcels with net developable areas of 35,000, 37,000 and 38,000 square feet (totaling 110,000 square feet), the County LCA would calculate a land capacity of 11 units. However, a parcel-by-parcel analysis based on the minimum lot size would recognize that each of the three parcels could only be divided into a maximum of three for a total of nine lots. Concerns regarding this aspect of

the methodology were raised by city planners while the methodology was being developed; however, the County made the decision to use the aggregation approach rather than the parcel-by-parcel approach over city objections.

The same aggregation problem also applies to vacant residential lots that are not large enough to be subdivided. All non-dividable, vacant residential lots with lot areas larger than the minimum lot size would be counted as adding that portion of their lot areas larger than the minimum lot size to the available land capacity, where such capacity would not actually exist. Some of this over-estimation of capacity would be offset by the infrastructure deductions incorporated into the methodology; however, the net result of these opposing effects and the magnitude of the potential over-estimation has not been analyzed.

The LCA methodology also does not include deductions for wetland buffers. While it is true that in some developments small portions of wetland buffers may be allowed to take up part of required minimum lot areas, in the most recently approved preliminary plat in Nooksack (Plat of Hollandia Place) the configuration was such that none of the required 50-foot wetland buffer was included in lot area. Under the County LCA methodology the approximately 4 acres of wetland buffers that were protected through the City's critical areas and shoreline regulations would be inappropriately counted toward available land capacity.

Finally, the County LCA methodology does not take into account areas recently impacted by toxic sedimentation from Swift Creek. The fact that this issue was not addressed in the methodology is not due to an oversight by County and City planners, but rather is only now being brought forward because Nooksack recently received the results of some local investigation into the extent of the potential effect. As County officials are aware, Swift Creek carries sediment that includes a naturally occurring form of asbestos that may be hazardous to humans when it becomes airborne. Such an occurrence is of particular concern in potential residential areas where homes might be constructed and children might be left to play in areas where such toxic sediment had been deposited. Map 3 shows the area adjacent to the Sumas River that is of primary concern to Nooksack officials. Following the flooding that occurred this past January, the City hired a surveyor to map the outer limits of the sediment deposition zone. According to our calculations, removing the identified area would reduce the residential land capacity by approximately 18 acres (in addition to the 4.5 acres of the total sediment impact area that was previously excluded from the LCA due to other critical areas such as wetlands, floodways and stream buffers).

All of the issues brought forward in the above sections are not intended to imply that the results of the Land Capacity Analysis should be discarded, but rather it should be recognized that all results generated are approximate and should not be used as if generated by a precise measuring tool. For this reason, LCA results should be used as one resource in making UGA decisions, but not the only resource.

### Residential Land Capacity Conclusion

Based on a comparison of the County LCA with the quantity of land needed to accommodate the City's proposed population growth allocation and in consideration of the LCA methodology issues raised above, it is the City's conclusion that the existing Nooksack UGA contains sufficient land to accommodate anticipated residential growth through 2031. If it is determined that the existing UGA is slightly too small to accommodate anticipated growth, the City will consider implementing a number of additional strategies to encourage greater in-fill, such as adoption of cluster residential zoning, thereby avoiding the need to expand the UGA at this time. Such a conclusion is consistent with the vision set forth in the Nooksack comprehensive plan and is supported by the Nooksack City Council at this time.

## **EMPLOYMENT ALLOCATION**

### Baseline Employment Numbers

According to data compiled by the County's consultant, in 2008 a total of 206 commercial/industrial jobs were identified in the Nooksack UGA. This included 19 commercial jobs, 57 retail jobs and 131 industrial jobs. When viewed in relation to the 2008 population estimate for the Nooksack UGA, this level of employment equated to a jobs-to-population ratio of 18.1%.

### County Commercial/Industrial Employment Growth Alternatives

As part of the 10-Year Review and associated environmental review, the County established a number of alternatives for employment growth in the Nooksack UGA. These alternatives range from a low of adding 21 jobs to a high of adding 266 jobs (Alternative Y).

### City Employment Growth Allocation

Following its public hearing on March 16, 2009 the Nooksack City Council chose the highest available employment growth number from the alternatives provided by the County. Alternative Y would allocate 266 additional jobs to the Nooksack UGA. Alternative Y would result in an increase in the jobs-to-population ratio from 18.1% to 20.6%.

### Commercial/Industrial Land Capacity Results

The results of the County LCA with respect to employment capacity indicate that the Nooksack UGA contains nearly the exact quantity of land necessary to accommodate the City's proposed employment growth allocation. The LCA indicates a deficit of approximately 1 acre of commercial/industrial land. At the meeting of the Growth Management Coordinating Council (GMCC) held on June 3, 2009, an additional allocation of previously unallocated employment growth was discussed. Under this increased allocation, the Nooksack UGA would be allocated an additional 124 jobs. Such an additional allocation would increase the Nooksack deficit as shown in the LCA to approximately 16 acres. At the GMCC meeting the Nooksack City Council member indicated the willingness to shift 100 of the additionally allocated jobs to the City of

Sumas, whose allocation numbers appear to be unreasonably low. Such a shift in employment allocation would reduce the Nooksack deficit to approximately 3-4 acres.

#### Commercial/Industrial Land Capacity Modifications

The results of the Land Capacity Analysis in Nooksack with respect to employment were based on data from recent developments in the city, supplemented by historic data regarding achieved floor area ratios and employment densities. These data show a pattern of commercial and industrial development that includes relatively low floor area ratios and relatively high employment densities. The net result is a relatively low density of employees per acre. If future commercial and industrial developments occur at higher floor area ratios and lower employment densities, most if not all of the deficit of commercial and industrial land in Nooksack would be eliminated.

#### Commercial/Industrial Land Capacity Conclusion

Based on the above analysis and discussion, the City of Nooksack has concluded that the Nooksack UGA as it is currently designated is sized appropriately to accommodate the amount of commercial and industrial growth anticipated over the next 20+ years. Nooksack supports the shifting of 100 jobs out of the additional allocation proposed by the County to the Sumas UGA where such development is more likely and where the industrial land base is in place.

### **UGA BOUNDARY MODIFICATIONS**

The City of Nooksack is not proposing any changes to the boundaries of the Nooksack UGA at this time. The Nooksack City Council is committed to encouraging in-fill into the existing City limits prior to considering further annexations.

### **CAPITAL FACILITIES**

The City's current capital facilities plans do not address the provision of services through the year 2031. This is not unusual given that utility comprehensive plans typically address the succeeding 20-year period and the County's 10-year UGA review is considering a time horizon from 2008 through 2031, a period of 23 years. Based on limited City analysis due to the limited timeframe provided by the County for such review, the City has determined that although additional capital facilities planning will be required and although some expansion of specific capital facilities will be required, the City will be able to provide all required urban services through the planning period. In addition, the City recognizes that additional capital facilities planning to address infrastructure needs and financial capacity will be required in conjunction with the 2011 update of the City's comprehensive plan.

#### Water Service

The City's water comprehensive plan identifies some but not all of the locations of needed infrastructure improvements throughout the Nooksack UGA. The next required

update of the water comprehensive plan would not be until 2012. The City purchases water from the city of Sumas through a wholesale water supply agreement. This agreement includes a supply sufficient to meet the City's needs through the majority of the planning period. The city of Sumas holds substantial water rights and has indicated an ability and willingness to increase the supply of water available to Nooksack.

#### Sewer Service

Nooksack transmits sewage to the Everson sewage treatment plant that serves both Everson and Nooksack. At the current time the City of Everson does not have a sewer comprehensive plan. The city of Everson is currently pursuing funding for development of such a plan. The capital facilities element of the Nooksack comprehensive plan addresses infrastructure needs in some but not all of the current UGA. The Nooksack share of the available capacity in the Everson sewage treatment plant is sufficient to accommodate growth for the next 13 to 15 years. Development of additional capacity will be necessary, and it is anticipated that the upcoming comprehensive planning process will identify a timeline for expansion of the existing treatment plant and appropriate funding sources.

#### Other Capital Facilities and Services

No limitations based on other capital facilities or services needs have been identified at this time.

### **CONCLUSION**

The City of Nooksack UGA Proposal supports the retention of the Nooksack UGA in its current configuration. If the results of County capacity analyses show that the Nooksack UGA is slightly under-sized, the City proposes to pursue modest measures to increase opportunities for in-fill within the current UGA and thereby avoid the need to expand the UGA at this time.