



Urban Growth Area Review

WHATCOM 2031 ■ County Executive Recommendation ■ August 17, 2009

Over the past year, we have asked our citizens what they value in their community and how they believe growth should be directed. It is clear that quality of life – reflected in our neighborhoods, working farms, rural areas and the environment is a top priority. The community wants our drinking water supplies and the environment protected. They strongly favor planning for growth and accept that new neighborhoods with higher density development are allowable if carefully designed and open space provided.

Whatcom County has worked collaboratively with its cities in review of the Urban Growth Areas. While the Growth Management Act recognized counties as regional governments charged with the responsibility for forecasting and allocating growth for urban growth areas, and designating the boundaries, cities are the primary providers of urban governmental services within urban growth areas. Cooperation with cities and public service providers are essential to implementing the vision citizens expect for our community.

Upon careful review and consideration of the Urban Growth Area proposals, Growth Management Coordinating Council recommendations and public input, I am pleased to submit my recommendations for Urban Growth Areas in Whatcom County. These recommendations are based on the following key values:

❖ ***Protect our water supplies and environment***

The Urban Growth Area proposal includes removal of areas currently designated for Urban Growth within the Lake Whatcom, Lake Padden, Drayton Harbor and Birch Bay watersheds.

❖ ***Agricultural land should be conserved***

Agriculture is a vital part of our economy. While the proposal allows for modest expansion of Lynden into agricultural lands, other agricultural lands in the Urban Growth Areas of Everson, Ferndale, and Nooksack are removed and placed back into conserved resource lands.

❖ ***Growth should emphasize infill***

The proposal reduces the size of Urban Growth Areas in Whatcom County by 7,815 acres, while providing for a population increase of 11,664.

❖ ***Distribution of growth should be balanced***

The requests for allocation of growth from the cities must be balanced with market reality and regional land use patterns. The City of Bellingham request for no additional growth allocation can lead to increased pressure on rural and resource lands if there are not sufficient housing opportunities. Bellingham is

requested to develop a proposal that shows how they will accommodate additional population within their city and urban area as part of the next step in the planning process.

Requests from several of our small cities exceed normal growth expectations. The Whatcom County Council is encouraged to allow small cities to become their own economic centers which should allow more efficient delivery of public services and facilities, and reduce commuter traffic into Bellingham. These requests should be balanced with market reality and consideration given to ensuring that low-density sprawl does not place increased pressure on surrounding rural and resource lands. Growth allocations to some of these communities have been reduced; with the balance of the request held in reserve for later allocation should growth rates exceed expectations.

❖ ***Urban Growth Area Reserves***

Urban Growth Area Reserves are proposed for a few areas. This is a new land use designation applied to areas which are adjacent and contiguous to an Urban Growth Area which appear to be suitable for future inclusion in the respective Urban Growth Area. These areas are either not warranted at present, based on growth rates and land supply for the respective urban area, or they include areas and resources that require conservation and protection before urban growth is expanded.

The recommendations herein encourage growth to be concentrated in urban areas, with distinct boundaries between urban and rural uses. Resource lands and water resources, and the County's natural environment are protected. Cities and urban communities are compact and dynamic providing both residential and employment opportunities supported by services. A sense of community is retained, quality of life is protected, and the County's implemented vision is measurable and actively pursued.

Respectfully submitted,



Pete Kremen
County Executive

Growth Management Act Requirements

The Growth Management Act (GMA) requires counties to review Urban Growth Areas at least every ten years¹. Whatcom County was required to complete this review in 2007; the Western Washington Growth Management Hearings Board (WWGMHB) has set a deadline of December 1, 2009 to complete this review.

Requirements include: review the densities permitted within both the incorporated and unincorporated portions of the urban growth area; review the extent to which the urban growth occurring within the county has located within each city and the unincorporated portions of the urban growth areas; revise the county comprehensive plan designating urban growth areas, and the densities permitted in the urban growth areas by the comprehensive plans of the county and each city to accommodate the urban growth projected to occur in the county for the succeeding twenty-year period; and the county must consult with cities regarding UGAs and justify in writing if no agreement is reached.

20-year Growth Forecast

The Growth Management Act requires Urban Growth Areas to include sufficient areas and densities to accommodate the urban growth projected to occur in the next twenty years. The growth forecast must be based upon the growth management population projection prepared by the Washington State Office of Financial Management (OFM). OFM forecasts for 2029 range from a population estimate of 216,300 to a high of 318,832 (the 2008 OFM estimate of population in Whatcom County was 191,000.)

Whatcom County utilized consultants (Berk and Associates) to review the population and growth forecasts and prepare recommendations². Those recommendations were reviewed by city and county staff. The Growth Management Coordinating Council has recommended a population forecast of 253,951 (62,951 additional people from 2008) and an employment forecast of 35,424 additional non-agricultural jobs.³ This was an increase of the growth forecast recommended by Berk and Associates for 2029 (251,490)

Executive Recommendation: The county-wide growth forecast recommended by the consultants is a reasonable forecast at a county-wide level (251,490). The recommendations of the Growth Management Coordinating Council (GMCC) increased the forecast based on allocation requests rather than reducing requests to meet the forecast. The more important discussion is the proper allocation of growth to each urban area and rural areas. The growth forecast recommendation is based on the consultant and staff recommendations for 2029 (251,490) with adjustments to the Growth Management Coordination Council allocations to urban and rural areas.

¹ RCW 36.70A.130(3)

² "Whatcom County Countywide Population and Employment Extrapolations and Scenarios, Berk and Associates, February 9, 2009

³ "Urban Growth Area Review", Growth Management Coordinating Council, UGA Review, July 1, 2009

Allocation of Growth

Whatcom County must determine what amount of the forecast growth should be allocated to urban and rural areas. There are ten (10) Urban Growth Areas, plus rural lands, where growth is anticipated.

Whatcom County consultants reviewed the historic growth patterns of the various Urban Growth Areas and rural areas, and provided alternative scenarios for allocation of that growth.⁴ Cities submitted their requests⁵ for allocation of that growth to their respective urban area. Whatcom County submitted a request for forecasts for Columbia Valley⁶, Birch Bay⁷ and Cherry Point.

The Growth Management Coordinating Council supported⁸ the allocation requests of the individual jurisdictions without any adjustments. These requests were within the expected overall growth forecast for Whatcom County. These requests reflected a significant increase in the share of growth allocated to the smaller urban areas, and a corresponding decrease allocated to the city of Bellingham.

Executive Recommendation: The Whatcom County Council and Planning Commission are encouraged to consider alternative allocation scenarios. The requests for allocation of growth from the cities needs to be balanced with market reality and regional land use patterns.

Bellingham has been, and will continue to be, the primary population and employment center in Whatcom County. The City of Bellingham request for no additional growth allocation can lead to increased pressure on rural and resource lands if there are not sufficient housing opportunities in that community. Bellingham is requested to develop a proposal that shows how they will accommodate additional population (4,441) within their city and urban area as part of the next step in the planning process. The allocation should consider the following order of priority:

1. Infill within city and existing urban growth area.
2. Review or amend land use plans to allow additional densities within the city to accommodate the additional growth.
3. Limited and strategic expansion into rural areas.

Requests from several small cities exceed normal growth expectations for those communities. The public has voiced support⁹ for the small cities and urban areas to

⁴ "Phase 1 Allocations of 2031 Growth to Planning Areas", Berk and Associates, January 13, 2009

⁵ City requests submitted to County Council and County Planning Commission on June 8, 2009. These requests were reviewed in a public meeting on June 16, 2009, and the County Council held a public hearing on those requests on June 23, 2009.

⁶ County Council recommendation regarding population forecast on March 17, 2009.

⁷ Birch Bay population forecast based on Birch Bay Community Plan (2004).

⁸ "Urban Growth Area Review", Growth Management Coordinating Council, UGA Review, July 1, 2009

⁹ "Questionnaire Summary, Whatcom 2031," December 2008; "Whatcom 2031 Regional Growth Alternatives Workshops," June 2009; "Whatcom 2031 Vision Workshops Summary", October 2008

become their own economic centers. Having small cities become more self-sufficient should allow more efficient delivery of public services and facilities, and reduce commuter traffic into Bellingham.

Growth allocations to some of these smaller urban communities (Blaine, Everson, Ferndale, Nooksack, Sumas) are recommended to be reduced to more realistic requests, with the balance of the request held in reserve for later allocation should growth rates exceed expectations or mitigation of existing boundaries.

Table 1, Forecasts and Allocations for Population Growth

Study Area	2008 Population	City Proposal		Executive Recommendation	
		Growth Allocation	2029 Total Population	Growth Allocation	2029 Total Population
Bellingham UGA	89,284	23,771	113,055	22,477	111,761
Birch Bay UGA	5,290	4,329	9,619	3,239	8,529
Blaine UGA	4,667	4,700	9,367	4,249	8,916
Columbia Valley UGA	3,924	1,076	5,000	1,076	5,000
Everson UGA	2,395	1,948	4,343	1,228	3,623
Ferndale UGA	12,019	8,687	20,706	8,121	20,140
Lynden UGA	11,613	7,414	19,027	4,546	16,159
Nooksack UGA	1,137	1,159	2,296	944	2,081
Sumas UGA	1,279	793	2,072	793	2,072
<i>Rural</i>	<i>58,305</i>	<i>9,074</i>	<i>68,466</i>	<i>8,300</i>	<i>67,692</i>
TOTALS	191,000	62,951	253,951	54,973	245,973

Table 2, UGA and UGA Reserve Allocations for Population Growth

Study Area	2008 Population	City/Community Proposal		Executive Recommendation		
		Growth Allocation	2029 Total Population	UGA Growth Allocation	Reserve Allocation	2029 Total Population with Reserve
Bellingham UGA	89,284	23,771	113,055	22,477	4,441	116,202
Birch Bay UGA	5,290	4,329	9,619	3,239	1,090	9,619
Blaine UGA	4,667	4,700	9,367	4,249	0	8,916
Columbia Valley UGA	3,924	1,076	5,000	1,076	0	5,000
Everson UGA	2,395	1,948	4,343	1,228	720	4,343
Ferndale UGA	12,019	8,687	20,706	8,121	566	20,706
Lynden UGA	11,613	7,414	19,027	4,546	957	17,116
Nooksack UGA	1,137	1,159	2,296	944	0	2,081
Sumas UGA	1,279	793	2,072	793	0	2,072
<i>Rural</i>	<i>58,305</i>	<i>9,074</i>	<i>68,466</i>	<i>8,300</i>	<i>774</i>	<i>68,466</i>
TOTALS	191,000	62,951	253,951	54,973	8,548	254,521

Table 3, Share of Population Growth by Study Area

	2008 Population	Share of Population Growth				Policy Based			
		2008 Share of Population	1990- 2000	2000- 2008	1990- 2008	Current Comp Plan	GMCC Proposed	Executive Proposed UGA	Executive Proposed with Reserve
Bellingham UGA	89,284	46.7%	43.0%	46.9%	44.5%	51.4%	37.8%	40.9%	42.4%
Birch Bay UGA	5,290	2.8%	5.8%	3.3%	4.8%	7.5%	6.9%	5.9%	6.8%
Blaine UGA	4,667	2.4%	3.2%	4.5%	3.7%	4.6%	7.5%	7.7%	6.7%
Columbia Valley UGA	3,924	2.1%	5.2%	5.9%	5.5%	3.7%	1.7%	2.0%	1.7%
Everson UGA	2,395	1.3%	1.3%	0.5%	1.0%	2.4%	3.1%	2.2%	3.1%
Ferndale UGA	12,019	6.3%	7.6%	8.6%	8.0%	10.8%	13.8%	14.8%	13.7%
Lynden UGA	11,613	6.1%	8.1%	8.4%	8.2%	10.7%	11.8%	8.3%	8.7%
Nooksack UGA	1,137	0.6%	0.7%	1.0%	0.8%	1.4%	1.8%	1.7%	1.5%
Sumas UGA	1,279	0.7%	0.5%	1.2%	0.8%	1.0%	1.3%	1.4%	1.2%
<i>Rural</i>	59,392	31.1%	24.7%	19.7%	22.8%	6.3%	14.4%	15.1%	14.3%
TOTALS	191,000	100.0%	100%	100%	100%	100%	100%	100%	100%

Table 4, Population Growth Rate by Study Area

	2008 Population	Share of Population Growth				Policy Based			
		2008 Share of Population	1990- 2000	2000- 2008	1990- 2008	Current Comp Plan	GMCC Proposed	Executive Proposed UGA	Executive Proposed with Reserve
Bellingham UGA	89,284	46.7%	2.5%	1.7%	2.1%	1.7%	1.1%	1.1%	1.3%
Birch Bay UGA	5,290	2.8%	7.2%	2.0%	4.9%	3.5%	2.9%	2.3%	2.9%
Blaine UGA	4,667	2.4%	3.1%	2.6%	2.9%	2.4%	3.4%	3.1%	3.1%
Columbia Valley UGA	3,924	2.1%	18.1%	5.9%	12.5%	3.2%	1.2%	1.2%	1.2%
Everson UGA	2,395	1.3%	2.5%	0.7%	1.7%	2.5%	2.9%	2.0%	2.9%
Ferndale UGA	12,019	6.3%	3.6%	2.4%	3.1%	2.6%	2.6%	2.5%	2.6%
Lynden UGA	11,613	6.1%	4.1%	2.4%	3.3%	2.6%	2.4%	1.6%	1.9%
Nooksack UGA	1,137	0.6%	3.8%	3.0%	3.5%	3.4%	3.4%	2.9%	2.9%
Sumas UGA	1,279	0.7%	2.3%	3.2%	2.7%	2.4%	2.3%	2.3%	2.3%
<i>Rural</i>	59,392	31.1%	2.0%	1.1%	1.6%	0.3%	0.7%	0.6%	0.7%
TOTALS	191,000	100.0%	2.7%	1.7%	2.3%	1.6%	1.4%	1.2%	1.4%

Table 5, Forecasts and Allocations for Employment

Study Area	2008 Employment	City/Community Proposal		Executive Recommendation	
		Growth Allocation	2029 Total Employment	Growth Allocation	2029 Total Employment
Bellingham UGA	51,153	18,829	69,982	18,829	69,982
Birch Bay UGA	436	489	925	489	925
Blaine UGA	2,971	1,903	4,874	1,903	4,874
Cherry Point UGA	1,182	760	1,942	760	1,942
Columbia Valley UGA	90	455	545	359 ¹⁰	449 ¹¹
Everson UGA	638	628	1,266	602	1,240
Ferndale UGA	5,534	4,747	10,281	4,335	9,869
Lynden UGA	4,832	3,559	8,391	3,115	7,947
Nooksack UGA	206	290	496	130	336
Sumas UGA	254	391	645	391	645
<i>Rural</i>	<i>10,130</i>	<i>3,373</i>	<i>13,503</i>	<i>2,276</i>	<i>12,406</i>
TOTALS	77,426	35,424	112,850	33,188	110,614

Table 6, Share of Employment Growth by Study Area

	2008 Employment	2008 Share of Employment	City - GMCC Proposed	Executive Proposed UGA	Executive Proposed with Reserve
Bellingham UGA	51,153	66.1%	53.2%	56.7%	56.6%
Birch Bay UGA	436	0.6%	1.4%	1.5%	1.5%
Blaine UGA	2,971	3.8%	5.4%	5.7%	5.7%
Cherry Point UGA	1,182	1.5%	2.1%	2.3%	2.3%
Columbia Valley UGA	90	0.1%	1.3%	1.1%	1.3%
Everson UGA	638	0.8%	1.8%	1.8%	1.8%
Ferndale UGA	5,534	7.1%	13.4%	13.1%	13.0%
Lynden UGA	4,832	6.2%	10.0%	9.4%	9.4%
Nooksack UGA	206	0.3%	0.8%	0.4%	0.4%
Sumas UGA	254	0.3%	1.1%	1.2%	1.2%
<i>Rural</i>	<i>10,130</i>	<i>13.1%</i>	<i>9.5%</i>	<i>6.9%</i>	<i>6.8%</i>
TOTALS	77,426	100.0%	100%	100%	100%

¹⁰ Columbia Valley also includes a Reserve employment allocation of 59. This is the only UGA with a Reserve employment allocation.

¹¹ See note above.

Urban Growth Area Recommendations

Overview

The following pages provide an overview of the ten Urban Growth Area proposals and the County Executive's recommendations. Table 7 below summarizes the size of the current Urban Growth Areas in comparison to the city or community proposal, and the Executive's recommendation.

Table 7, Urban Growth Area (gross acres)

Study Area	Current UGA	City/Community Proposal	Executive Recommendation	Net Change from Current	Urban Reserve
Bellingham UGA	23,681	23,681	22,266	(1,415)	521
Birch Bay UGA	4,294	4,294	3,095	(1,199)	497
Blaine UGA	6,878	4,735	4,039	(2,839)	-
Cherry Point UGA	7,035	7,035	7,035	-	-
Columbia Valley UGA	1,489	1,339	1,117	(372)	37
Everson UGA	1,462	1,440	1,310	(152)	108
Ferndale UGA	7,553	6,411	5,718	(1,835)	774
Lynden UGA	3,803	4,132	3,975	172	157
Nooksack UGA	649	649	555	(94)	-
Sumas UGA	1,029	1,029	948	(81)	76
TOTALS	57,973	54,745	50,058	(7,815)	2,170

While the proposal allows for modest expansion of Lynden into agricultural lands, other agricultural lands in the Urban Growth Areas of Everson, Ferndale, and Nooksack are removed and placed back into conserved resource lands.

Table 8, Agricultural Lands in Urban Growth Area (gross acres)

Study Area	Acres Added to AG from UGA	Acres Removed from AG to UGA	Acres Added to AG from Current	Acres Removed from AG to Urban Reserve
Bellingham UGA	-	-	-	-
Birch Bay UGA	-	-	-	-
Blaine UGA	-	-	-	-
Cherry Point UGA	-	-	-	-
Columbia Valley UGA	-	-	-	-
Everson UGA	34	(27)	7	-
Ferndale UGA	37	-	37	-
Lynden UGA	-	(171)	(171)	(156)
Nooksack UGA	99	-	99	-
Sumas UGA	-	-	-	-
TOTALS	170	(198)	(28)	(156)

Bellingham

The City of Bellingham is the primary population and employment center in Whatcom County. During the 2004 comprehensive plan and development regulation review, the city and county worked together on updates to the Bellingham Urban Fringe Area Plan. Whatcom County finished a review of the Urban Growth Area as part of the subarea plan with enactment of Ordinance 2008-003. This ordinance amended the Urban Growth Area for Bellingham by adding 266 acres to the previous boundary. Due to the extensive process associated with the previous effort, the City of Bellingham submitted their UGA proposal on June 1, 2009 that proposes keeping the current growth allocation, along with UGA boundaries adopted by Ordinance 2008-003.

Executive Recommendation: There are two changes to the request from the City of Bellingham: 1) remove areas designated for urban growth in the Lake Whatcom and Lake Padden watersheds and 2) request that the city develop a proposal to demonstrate how it will accommodate an additional population allocation.

Urban Growth Areas are where growth is encouraged. The city concurs that additional lots in the Lake Whatcom watershed should not be created but wishes to keep areas in the watershed within the Urban Growth Area. Continued designation of land within the Lake Whatcom watershed for urban development contradicts our goals of protecting the watershed. Lake Padden is also considered a sensitive water body because it is designated as impaired by pollution under Clean Water Act standards. Protection of water quality from existing and future development can occur through cooperation of the county and city, but designating the Lake Whatcom watershed for urban growth sends the wrong message, while Lake Padden needs to be studied further before urban development continues in that watershed.

The City of Bellingham request for no additional growth allocation can lead to increased pressure on rural and resource lands if there are not sufficient housing opportunities in that community. Bellingham is requested to develop a proposal that shows how they will accommodate additional population within their city and urban areas as part of the next step in the planning process.

Table 9. Growth Allocation

	Existing Conditions		Proposed			
	2008	Current Share of County	Allocation	Share of County Growth	Reserve Allocation	2029 Total (with Reserve)
Population						
City Proposal	89,284	46.7%	23,771	37.8%	-	113,055
Executive Recommendation			22,477	40.9%	4,441	116,202
Employment						
City Proposal	51,153	66.1%	18,829	53.2%	-	69,982
Executive Recommendation			18,829	56.7%	-	69,982

Table 10. UGA Size

	Existing UGA	City Proposal	Executive Rec.	Net Change
UGA (gross acres)	23,681	23,681	22,266	(1,415)

Birch Bay

Birch Bay is one of three unincorporated Urban Growth Areas in the county. It serves primarily as a resort community, although its identity is shifting as more full-time residents move into the area. The community is extremely active in planning for its future, drafting the Birch Bay Community Plan in 2004 and crafting design guidelines for commercial areas. This community has a cohesive vision for growth and residents have worked collaboratively to achieve their common goals and objectives. The 2004 Community Plan was submitted as the proposal for Birch Bay Urban Growth Area designation.

Public facilities and services have been planned for Birch Bay. Birch Bay Water and Sewer District provides sanitary sewer and domestic water to the area. Fire protection services are provided by Fire District #21, which believes it cannot provide urban level of service without additional facilities.

Executive Recommendation: The growth forecast in the Community Plan for Birch Bay was done during a significant boom in residential development in that area. Since then, construction has slowed and our cities have raised the concern that the priority should be on urban growth in incorporated areas. Additionally, the community is developing plans to protect aquatic resources in Birch Bay, through the Birch Bay Watershed Characterization Project and the Birch Bay Watershed and Aquatic Management program.

The growth allocation is recommended to be reduced to the historic share for Birch Bay, with a corresponding decrease in the size of the Urban Growth Area. The balance of growth is held in reserve, with an Urban Growth Area Reserve sized to accommodate that growth. The designation of the Urban Growth Area includes lands that appear most suitable to development based on the Birch Bay Watershed Characterization Report and the Draft Environmental Impact Statement.

The community has been engaged in ascertaining the viability of incorporation. The proposed UGA includes the areas that would allow for an incorporation vote to proceed. If the community decides to incorporate, they can continue to set their vision and propose changes to the UGA.

Table 11. Growth Allocation

	Existing Conditions		Proposed			
	2008	Current Share of County	Allocation	Share of County Growth	Reserve Allocation	2029 Total (with Reserve)
Population						
Community Proposal	5,290	2.8%	4,329	6.9%	-	4,329
Executive Recommendation			3,239	5.9%	1,090	4,329
Employment						
Community Proposal	436	0.6%	489	1.5%	-	925
Executive Recommendation			489	1.5%	-	925

Table 12. UGA Size

	Existing UGA	Community Proposal	Executive Rec.	Net Change
UGA (gross acres)	4,294	4,294	3,095	(1,199)

Blaine

Blaine is the northwestern-most city in Whatcom County. The city is divided by Drayton Harbor: central Blaine and the Semiahmoo area to the west. These two areas are distinctly different. The central area is a traditional northwestern city with a vibrant downtown surrounded by neighborhoods of single family houses. The central area includes an extension of largely undeveloped, incorporated land about 3 miles out H Street. The Resort at Semiahmoo occupies all of west Blaine and is made up of the central resort on the end of Semiahmoo spit and recreational community upland of the spit.

The city proposal presented to Whatcom County asked for a allocation of 4,700 people and 1,903 employees. The city’s proposal recognized that the city’s Urban Growth Area was vastly oversized for the foreseeable future. The city proposed removal of over 2,000 acres from the Urban Growth Area, largely along Drayton Harbor. The city believed that Blaine is a more appropriate location to allocate growth and should be given precedence over the unincorporated UGAs and rural areas of Whatcom County.

Executive Recommendation: The City of Blaine is to be commended for their timely and bold action to reduce their Urban Growth Area, focusing on removal of the most sensitive lands surrounding Drayton Harbor. However, due to past decisions, the city is still able to accommodate twice as much population in their city as their allocation request without having to grow into surrounding lands.

The area immediately east of the city along Odell Road south to Sweet Road should be included in the Urban Growth Area. This is a logical growth area for the city and will address the city’s economic development goals. The area called “West Blaine” along Semiahmoo Drive is not warranted to be included in the Urban Growth Area at this time, and is not included in these recommendations.

Table 13. Growth Allocation

	Existing Conditions		Proposed			
	2008	Current Share of County	Allocation	Share of County Growth	Reserve Allocation	2029 Total (with Reserve)
Population						
City Proposal	4,667	1.4%	4,700	7.5%	-	9,367
Executive Recommendation			4,249	7.7%	-	8,916
Employment						
City Proposal	2,971	3.8%	1,903	5.4%	-	4,874
Executive Recommendation			1,903	5.7%	-	4,874

Table 14. UGA Size

	Existing UGA	City Proposal	Executive Rec.	Net Change
UGA (gross acres)	6,878	4,735	4,039	(2,839)

Cherry Point

Cherry Point has been designated for industrial uses since Whatcom County's first Comprehensive Plan in 1970. This region of Whatcom County has a number of factors that have made the location ideal for industrial uses, the large acreage demands of the types of industries likely to locate there, access to a deep water port, proximity to Canada, energy service from three providers and access to the Burlington Northern Railroad all contribute to the characteristics that make Cherry Point a desirable location for industry.

The Cherry Point UGA is a Major/Port Industrial UGA permitted under a different section of the GMA, RCW 36.70A.365. This section of the Growth Management Act allows for jurisdictions to designate an area outside of the traditional UGAs for Heavy Impact Industrial uses. RCW 36.70A.365 lists a number of criteria that must be met for a jurisdiction to designate a UGA, such as Cherry Point, including a requirement for an inventory of developable land to be conducted with findings that land suitable to site major industrial development is unavailable within other urban growth areas. This inventory was conducted as part of the designation in 1997, and no additional heavy industry locations have developed within other Urban Growth Areas to alter these findings.

Executive Recommendation: Cherry Point Industrial Urban Growth Area is vital to the county's economy. This area will serve the needs of Whatcom County beyond the twenty-year planning horizon of this plan.

Reduction of the Cherry Point Industrial Urban Growth Area is not advisable or practical, even though there appears to be excess capacity beyond the twenty-years. The boundaries are drawn along major roadways that serve as a transition or buffer to adjacent rural areas. Moving the boundary in would only increase the conflicts between rural and heavy industrial uses.

Therefore, there are no changes proposed for the Cherry Point Industrial Urban Growth Area.

Table 15. Growth Allocation

	Existing Conditions		Proposed			
	2008	Current Share of County	Allocation	Share of County Growth	Reserve Allocation	2029 Total (with Reserve)
Employment						
County Proposal	1,182	1.5%	760	2.1%	-	1,942
Executive Recommendation			760	2.3%	-	1,942

Table 16. UGA Size

	Existing UGA	County Proposal	Executive Rec.	Net Change
UGA (gross acres)	7,035	7,035	7,035	(0)

Columbia Valley

The Columbia Valley Urban Growth Area (UGA) is one of three totally unincorporated UGAs in Whatcom County. Situated between Sumas Mountain and Red Mountain, the Columbia Valley UGA contains two large residential subdivisions (Peaceful Valley and Paradise Lakes), a recreational development (Camper’s Paradise), and undeveloped land. The Whatcom County Comprehensive Plan was amended in 1999 to establish a UGA in the Columbia Valley (Ordinance 99-075).

The Foothills Subarea Plan Advisory Committee issued a Draft Foothills Subarea Plan in October 2007. This Draft Subarea Plan, which has not yet been adopted, contains recommendations for the Columbia Valley UGA. The County Council passed a motion to utilize a population projection of 5,000 people in the Columbia Valley UGA on March 17, 2009.

Executive Recommendation: The Columbia Valley’s population is greater than three of the seven cities in Whatcom County. If the area had chosen to incorporate prior to the Growth Management Act, it would be considered an Urban Growth Area. While there are significant public facility issues in this Urban Growth Area, they are not vastly different than the other small cities.

Removal of the Urban Growth Area at this time sends a wrong message to the community. This community would greatly benefit from additional employment opportunities, and provision of public facilities and services, all of which can occur through an Urban Growth Area designation rather than being considered rural. Completing planning by 2011 that demonstrates how the plan and development regulations will meet the requirements of the Growth Management Act should be a priority.

The Foothills Advisory Committee recommendation for the Urban Growth Area was based on a higher growth allocation than recommended by the County Council in 2009. Thus, the boundary for the Urban Growth Area is recommended for further reduction, with a small area reserved for future employment purposes.

Table 17. Growth Allocation

	Existing Conditions		Proposed			
	2008	Current Share of County	Allocation	Share of County Growth	Reserve Allocation	2029 Total (with Reserve)
Population						
City Proposal	3,924	2.1%	1,076	1.7%	-	5,000
Executive Recommendation			1,076	2.0%	-	5,000
Employment						
City Proposal	90	0.1%	455	1.3%	-	545
Executive Recommendation			359	1.1%	59	508

Table 18. UGA Size

	Existing UGA	City Proposal	Executive Rec.	Net Change
UGA (gross acres)	1,489	1,339	1,117	(372)

Everson

The Everson urban growth area is located in western Whatcom County approximately 18 miles northeast of the city of Bellingham and in close proximity to the Canadian border. The City and its UGA serve the surrounding area as a commercial, retail and industrial center. The entire UGA is accessible by two major state highways, SR 544 that traverses the extents of the city, and SR 9 that connects the city to the Canadian border, and as far south as Sedro Woolley, to points further south in northwest Washington.

The city proposal presented to Whatcom County requested a high growth allocation consistent with their 2.5% average annual growth rate experienced during the 1990s. Some of this additional growth is to accommodate a shift from Bellingham and rural areas to the small cities as envisioned by one of the Draft EIS alternatives. The City of Everson would like to see the jobs-to-population ratio increase over time so that more citizens of the area will be able to work in their own community and avoid traveling to job centers. The city also proposed a swap of Urban Growth Area that is less suited for urban development for land better suited. The area to be added is adjacent to the current city limits and planned expansion of the city’s largest park. This land is within walking distance to downtown and can be easily served by the sewage treatment plant. The lands removed are agricultural lands which would be put into resource land conservation.

Executive Recommendation: While Everson’s growth request might seem high, it is important to allow for the city to become its own economic center. The proposed land swap results in a net gain in protection of agricultural lands for Whatcom County, even though the land added is used also for agricultural purposes. The city has made a compelling argument to include that land in the Urban Growth Area as it supports their vision of a walkable community, with residential uses close to parks, and can be easily served with public facilities.

The recommendation accepts the reductions proposed by the City. The proposed addition only includes a portion of the parcel, excluding land on the north side that is located within the 100-year floodplain. Additionally, existing residential areas to the south that are characterized by large lots, are put into an Urban Growth Area Reserve.

Table 19. Growth Allocation

	Existing Conditions		Proposed			
	2008	Current Share of County	Allocation	Share of County Growth	Reserve Allocation	2029 Total (with Reserve)
Population						
City Proposal	2,395	1.3%	1,948	3.1%	-	4,343
Executive Recommendation			1,228	1.5%	720	4,343
Employment						
City Proposal	638	0.8%	628	1.8%	-	1,266
Executive Recommendation			602	1.8%	-	1,240

Table 20. UGA Size

	Existing UGA	City Proposal	Executive Rec.	Net Change
UGA (gross acres)	1,462	1,440	1,310	(152)

Ferndale

Ferndale has changed from the rural, agricultural-based small town of the early 1900's to a city that is creating a diversity of businesses including light industrial, technology, manufacturing, retail, professional services, and many other fields. Ferndale is emerging as a more well-rounded, self-supporting city which values its small-town atmosphere, and starting to shed its image of being a bedroom community.

The city requested the highest population allocation under the Draft EIS alternatives and an employment allocation higher than the highest range of the Draft EIS. The employment request is based on their belief that the city is a highly desirable location for new commercial and industrial development, that the retail base in Whatcom County will not stop growing, that the city does not want to be a bedroom community, and that land by I-5 and Slater Road is well-suited to urban uses. The city also proposed to deduct 120 acres of existing development on the north end of the Urban Growth Area (I-5 and Grandview). Ferndale's proposal that included a map with their proposed UGA was submitted on August 14, 2009.

Executive Recommendation: Since 2005, when the city completed their Buildable Lands Inventory, the City of Ferndale was aware that their Urban Growth Area was twice the size necessary. The city was cognizant in July 2008 that the deadline for Whatcom County to complete this review was June 2009 and that changes would be needed to comply with the Growth Management Act. In the absence of a specific proposal, city and county officials convened to review together the Urban Growth Area.

The results of the Land Capacity Analysis shows that the city's draft proposal of reducing the UGA by 900 acres would result in a capacity to accommodate 3,000 more people than the city's requested population. The Urban Growth Area should not be significantly oversized, thus residential areas to the north of the city are proposed as an Urban Growth Area Reserve. The city's request for additional employment allocation, without any specific area designated or environmental review completed, is not timely for consideration during this review. Specific data and input to support those requests is outstanding at this time and must be provided.

Table 21. Growth Allocation

	Existing Conditions		Proposed			
	2008	Current Share of County	Allocation	Share of County Growth	Reserve Allocation	2029 Total (with Reserve)
Population						
City Proposal	12,019	6.3%	8,687	13.8%	-	20,706
Executive Recommendation			8,121	14.8%	566	20,706
Employment						
City Proposal	5,534	7.1%	4,747	13.4%	-	10,281
Executive Recommendation			4,335	13.1%	-	9,869

Table 22. UGA Size

	Existing UGA	City Proposal	Executive Rec.	Net Change
UGA (gross acres)	7,553	6,837	5,718	(1,835)

Lynden

People are moving to Lynden for a variety of reasons: schools, family, agricultural, professional, and industrial jobs and retirement. The city has seen an increasing share of the county's population and employment locate here as a reflection of the community's commitment to creating a strong, vibrant and economically-balanced community. Lynden does not have sufficient lands designated for growth to keep pace with historic growth patterns. The city proposed an expansion of 354 gross acres to accommodate an additional 7,417 people. The city has completed capital facility plans for water and sewer systems, schools and other necessary capital facilities to support this level of growth. The city has an agreement with the state to address long-standing water right issues. Growth of Lynden is constrained by agricultural lands. Since the early 1990's Lynden and Whatcom County have known that future growth would extend west between Benson Road and the Guide Meridian. The city's proposal would remove approximately 327 of these acres currently designated Agricultural for urban growth, while remaining within the planned growth area.

Executive Recommendation: While ensuring that Whatcom County maintains a healthy agricultural economy is a worthy and laudable goal, the request for modest expansion of Lynden is justifiable and reasonable. In 2003, Whatcom County designated Target Areas for Purchase of Development Rights for lands north of Badger Road and west of the Guide Meridian following consultation with the City of Lynden. Lynden's proposal is within those Target Areas, with lands remaining and not requested at this time.

Some adjustment to the city's request is recommended. Reducing the amount of impact on agricultural lands can be offset by removing urban lands for agricultural purposes elsewhere. The limited expansion into agricultural lands west of Double Ditch Road should be placed into an Urban Growth Area Reserve, allowing the city and county to work on strategies and agreements to ensure that the county maintains the agricultural land base (100,000 acres) necessary to support this industry. While Lynden did not request the highest possible growth, the results of the land capacity analysis show that they will not be able to accommodate that population within their boundary without modification in plans.

Table 23. Growth Allocation

	Existing Conditions		Proposed			
	2008	Current Share of County	Allocation	Share of County Growth	Reserve Allocation	2029 Total (with Reserve)
Population						
City Proposal	11,613	6.1%	7,414	11.8%	-	19,027
Executive Recommendation			4,546	8.3%	957	17,116
Employment						
City Proposal	4,832	6.2%	3,559	10.0%	-	8,391
Executive Recommendation			3,115	9.4%	-	7,947

Table 24. UGA Size

	Existing UGA	City Proposal	Executive Rec.	Net Change
UGA (gross acres)	3,803	4,132	3,975	172

Nooksack

The Nooksack urban growth area is located in western Whatcom County approximately 18 miles northeast of the City of Bellingham. The UGA is located immediately to the northeast of the City of Everson, and is served by a major state highway, SR 9 that connects to City of Sumas, and heads north to the Canadian border, and as far south as Sedro Woolley. The Community’s expressed vision is to maintain safe and friendly family living in a small town rural setting, while protecting and enjoying the natural environment and agricultural lands of the surrounding area, and promoting development of new jobs and businesses.

Nooksack is surrounded on all sides by physical constraints that present challenges to development. The city is also surrounded by agricultural land, or rural land with prime soils. The city’s proposal was to support their current Urban Growth Area, although they did recommend shifting some employment growth to the City of Sumas.

Executive Recommendation: Nooksack, like other small cities within Whatcom County, should be supported in their efforts to become their own economic centers. The population requests, however, were outside the range of reasonable forecasts – even with incentives. Reducing the size of the Urban Growth Area will allow land currently used for agricultural purposes to be re-designated for that purpose. Areas east of the Sumas River and south of Breckenridge Creek are recommended to be removed from the Urban Growth Area. The area north of Breckenridge Creek is not prone to flooding and includes Nooksack Elementary School; this area should remain within the Urban Growth Area as a logical extension of the city. The city’s employment base is largely located in the adjoining City of Everson.

Table 25. Growth Allocation

	Existing Conditions		Proposed			
	2008	Current Share of County	Allocation	Share of County Growth	Reserve Allocation	2029 Total (with Reserve)
Population						
City Proposal	1,137	0.6%	1,159	1.8%	-	2,296
Executive Recommendation			944	1.7%	-	2,081
Employment						
City Proposal	206	0.3%	290	0.8%	-	496
Executive Recommendation			130	0.4%	-	336

Table 26. UGA Size

	Existing UGA	City Proposal	Executive Rec.	Net Change
UGA (gross acres)	649	649	555	(94)

Sumas

The Sumas urban growth area is located in north central Whatcom County along the USA-Canada international border. The city is served by state highway (SR 9) connecting the city to the Canadian border and extending to points further south in northwest Washington. The community's vision for the City is to take advantage of its location and function as an international border crossing to capitalize on commercial and retail economic opportunities presented by border traffic. The City has also expressed an interest in becoming a regional industrial center.

The city did not propose any modifications to the Urban Growth Area. The city discovered concerns related to the baseline employment figures used by the consultant which underestimated the potential demand for employment land. The city worked with the City of Nooksack and had agreed to some employment shifts between the two cities to help support Sumas' efforts. The city contemplates that it will want to expand the Sumas Industrial District at some point in the future.

Executive Recommendation: The city's request for keeping employment land to the south of the city along SR9 is recommended for staying in the Urban Growth Area. While the current numbers indicate a surplus of employment lands, our recommendation recognizes that this number was underestimated and a demand for such lands will arise during the twenty-year planning period.

The demand for residential lands is not as compelling at the current time. It appears that the city can accommodate the projected growth within city limits. However, the population growth forecast for Sumas might also be low, so lands suitable for expansion of the city but currently used for agricultural purposes are proposed as an Urban Growth Area Reserve. The city is requested to address infill measures before expansion into this Reserve, and to work with the county on strategies to conserve agricultural lands.

Table 27. Growth Allocation

	Existing Conditions		Proposed			
	2008	Current Share of County	Allocation	Share of County Growth	Reserve Allocation	2029 Total (with Reserve)
Population						
City Proposal	1,279	0.7%	793	1.3%	-	2,072
Executive Recommendation			793	1.4%	-	2,072
Employment						
City Proposal	254	0.3%	391	1.1%	-	645
Executive Recommendation			391	1.2%	-	645

Table 28. UGA Size

	Existing UGA	City Proposal	Executive Rec.	Net Change
UGA (gross acres)	1,029	1,029	948	(81)