



# CITY OF EVERSON

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Members of the Whatcom County Council  
Members of the Whatcom County Planning Commission  
311 Grand Avenue  
Bellingham, WA 98225

LONG RANGE  
PLANNING DIVISION

Subject: Whatcom County 10-Year Review of Urban Growth Areas  
City of Everson Response to Executive's Recommendation

County Council and Planning Commission Members:

The City of Everson has reviewed the County Executive's Recommendation regarding Urban Growth Areas (UGAs) dated August 17, 2009 and submits the following response for your consideration. In developing the City's UGA Proposal submitted this past June 2009, the Everson City Council worked very hard and thought very carefully about how the Everson UGA might be adjusted to support the development of a walkable and livable city while protecting valuable resource lands, reducing impacts to critical areas and efficiently using existing capital facilities. The end result was a proposed swap that included the removal of approximately 67 acres of land and the accompanying addition of approximately 45 acres. The Executive's Recommendation modified this Proposal in three ways: 1) The population growth allocated to the Everson UGA was substantially reduced; 2) 18 less acres were recommended to be added to the UGA (with 67 acres still being removed); and 3) 98 acres were removed from the UGA and placed into Urban Growth Area Reserve as areas likely to be needed to accommodate growth at some point in the future beyond the current planning horizon. Although not preferred, in general, the reductions proposed by the Executive are acceptable to the City; however, some specific concerns are discussed below. More importantly, the City would like to respond to some comments in the record regarding a perceived expansion into agricultural lands and clarify a number of apparent misunderstandings reflected in these comments.

### Residential Capacity and UGA Reserve

The Executive's Recommendation includes a sizable decrease in the population growth allocated to the City of Everson. This reduced allocation appears to be consistent with the overall pattern of growth seen in Everson from 1990 to 2009 where periods of more rapid growth have been followed by periods of somewhat slower growth. Although this allocation is lower than those included in both the County's and the City's current comprehensive plans, such an allocation appears to be reasonable given recent growth patterns while still allowing opportunities for the City to accommodate future shifts in growth from rural areas and Bellingham. In addition, the designation of UGA Reserve areas correctly targets land that will likely be appropriate for urban

development in the future should more rapid growth occur or when future growth patterns warrant such an expansion.

#### Reduced Area to Be Added to UGA

Although the Executive's Recommendation did not differ from the City's Proposal in recommending the removal of 67 acres from the UGA, the Recommendation did reduce the area to be added to the UGA from 45 acres to 27 acres—a net reduction of 18 acres. Such a reduction has a number of apparent benefits. First of all, it further increases the net acreage retained in full resource protection. Second, the reduced area would not include the farm house and major farm buildings located in the northern portion of the property, but would include the small 1-acre residential lot located south of the farm buildings (closer to the City). Third, the remaining area to be added to the UGA is almost entirely outside of the 100-year floodplain. Finally, this reduced area would increase the proportion of City roadways that would have frontage on both sides of the street. In these ways, the Executive seems to have succeeded in striking a balance between conservation of the agricultural land base and provision of reasonable growth areas for the City.

#### No Net Loss of Agricultural Land

There have been a few comments in the record and in the local newspaper from the agricultural advocacy group Farm Friends that the City would like to respond to. In the comment letter dated 23 June 2009, Farm Friends states that it “**continues to support a policy of no net loss of agricultural land in Whatcom County.**” What has been confusing to the City is the fact that the City of Everson's UGA Proposal was designed to and does meet this very standard. With the reductions recommended by the Executive, the Everson Proposal more than meets this standard. Upon reviewing the Farm Friends' comments, it appears that there may be some misunderstanding as to the nature of the swap proposed by the City of Everson. Specifically, the Everson Proposal included a net gain for the County of 22 acres of land zoned for agriculture by the County. Of the 67 acres proposed for removal from the Everson UGA, at most 17 acres are occupied by non-farmable critical areas (like the Sumas River channel and its immediate riparian area and non-converted wetlands) and developed residential (non-farm) areas. Subtracting 17 from 67 acres equals 50 acres of farmable agricultural land that would be shifted out of the UGA into full resource protection. Thus, the original proposal which included adding 45 acres of agricultural land to the Everson UGA also met the No Net Loss standard in terms of actual farmable acreage.

#### Trading Critical Areas for Agricultural Land

In one Farm Friends comment it appears that they are suggesting that the City was proposing to swap critical areas for agricultural land. As discussed above, the actual farmable portion of the area that the City proposed for removal from the UGA contained more than an equal quantity of farmable land, not including the non-farmable critical areas. The main reason that the City highlighted the fact that under the City's proposal less critical areas would be impacted was not to suggest a trade for agricultural land, but rather to indicate that if the swap were approved, then less urban development would be located in proximity to critical areas.

#### Trading Land That Would Remain Agricultural Regardless

Other comments from Farm Friends seem to indicate that they perceive the City's proposed swap as trying to get credit for trading back agricultural land that would always remain farmed

whether inside or outside of the City. It was suggested that certain farmed areas could not be shifted out of agriculture due to their status as critical areas. While this perception is true for non-farmed areas like the channel of the Sumas River, it is certainly not true for floodplains in general. All farmed areas in the parcels proposed to be removed from the UGA would, upon annexation and in conjunction with development, be subject to conversion from agricultural use either to urban uses, like houses or industry, or to recreational uses, such as a golf course expansion, or to accompanying uses, such as stormwater facilities or open space. The statement that development is not allowed in the 100-year floodplain is incorrect as can be seen from a simple review of either the City of Everson Flood Damage Prevention Ordinance or the Department of Ecology’s Model Flood Ordinance. Under these regulations residential or non-residential development are allowed in floodplains as long as the first floor of a new structure is elevated to at least one foot above the base flood elevation of the 100-year flood event. In addition, although new homes are not allowed in certain portions of the floodplain mapped as floodways, these areas can be developed for stormwater facilities or recreational uses as long as no encumbrances are placed that would block the flow of floodwaters. Again, the City’s aim was to maintain the agricultural land base while directing urban development to more appropriate locations—such as away from critical areas.

Net Effect of Executive’s Recommendation on Agricultural Lands

Taking into account the reductions recommended by the Executive, the net effect on the County’s agricultural land base would be as follows:

- Agriculturally zoned land: Net increase of 40 acres.
- Currently Farmed Land: Net increase of 24 acres.

The following table breaks out the various components of the land to be added and removed from the UGA in terms of the net effect on the agricultural land base. Area 1 is the area proposed to be added to the Everson UGA as modified by the Executive’s Recommendation and Areas 2, 3A, 3B and 4 are the areas proposed to be removed from the UGA as presented in the City’s UGA Proposal.

Table 1: Net Impact on Agricultural Land (Acres)

Area	Farmed, Non-Critical Area, Not-Developed	Non-Farmed Critical Areas	Developed, Non-Farm Areas	Totals
Area 1	(26)	0	(1)	(27)
Area 2	4	6	5	15
Area 3A	4	1	0	5
Area 3B	27	0	0	27
Area 4	15	2	3	20
<b>Totals</b>	<b>24</b>	<b>9</b>	<b>7</b>	<b>40</b>

As stated in the City’s UGA Proposal, the City’s proposed swap of agricultural land is also intended to satisfy the condition of approval established by the Whatcom County Council through Ordinance No. 2007-049. Through that ordinance the County agreed to add a 3.25-acre strip of land to the Everson UGA, provided that the City agreed to give back an equal or greater quantity of like agricultural land as part of the next major UGA update.

Employment Capacity

The City of Everson supports the Executive's recommended allocation of employment to the Everson UGA. When viewed in combination with the recommended population growth allocation, the employment allocation would help increase the jobs-to-employment ratio in Everson.

Conclusion

The Executive's Recommendation strikes a good balance between the provision of appropriate land for urban growth and the conservation of the agricultural land base. As compared to the current UGA, the Executive's Recommendation would result in a net addition of 40 acres of agriculturally zoned land and a net addition of approximately 24 acres of land that is currently being farmed that would otherwise be subject to conversion to non-farm uses if left in the current UGA. The Everson Proposal as modified by the Executive more than meets the standard of No Net Loss put forward by Farm Friends and others and would result in a safer, more livable, more walkable and more efficient city environment.

Finally, the City has made it clear in the past that it is open to participating in the development and implementation of a program to transfer development potential out of rural and resource areas and into urban growth areas. Even though the City has more than met the standard of No Net Loss with its proposed swap, the City remains open to establishing some type of condition in conjunction with the proposed UGA swap that would require some level of participation in a TDR or PDR program prior to or commensurate with the annexation of the area proposed to be added to the Everson UGA.

Respectfully submitted,



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