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SEP 17 2009

LONG RANGE
PLANNING DIVISION

MAYOR – ROBERT “BOB” BROMLEY

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September 17, 2009

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

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

County Council and Planning Commission members:

The City of Sumas has reviewed the County Executive’s Recommendation regarding Urban Growth Areas (UGAs) dated August 17, 2009 and submits the following response for your consideration. The Executive’s Recommendation retains one portion of the current UGA, removes a small portion of the UGA, and shifts a large portion of the Sumas UGA to an Urban Growth Area Reserve designation. While the City of Sumas understands and supports some of these recommendations, other aspects of the Executive’s Recommendation raise important questions and concerns—in some cases based on acknowledged shortcomings in County data that led to potentially low allocations for both population growth and employment. These issues are discussed below.

Residential Capacity

The Executive’s Recommendation included a population growth allocation for the City of Sumas of 793 people. This allocation was limited by the bracketing established as part of the EIS scoping process, which proceeded well in advance of the development of both City and County UGA proposals. Unfortunately, this allocation falls below the linear growth rate (average growth per year) experienced in Sumas from 2000 through 2009. The Executive’s Recommendation acknowledges that if the same methodology had been used to derive a population growth allocation for Sumas as was used for the other small cities, Sumas would have received an allocation of over 1,100. The shifting of properties currently in the UGA into UGA Reserve status simply due to EIS procedural requirements seems unfair; but if this is unavoidable, then it would seem reasonable to bring some of these areas back into full UGA status at the earliest possible opportunity, such as during the 2011 comprehensive plan update. If this is the case, it would also seem inappropriate to add requirements related to mitigation of resource lands simply due to the limitations created by the County’s process.

It is also important to note that with the reductions recommended by the Executive, the Sumas UGA would have a surplus of only 2 residential acres. This relatively small margin of error is

further called into question when one considers that the Executive used higher assumed residential densities than proposed by the City. If the assumed densities proposed by the City were used (which were all above the policy-based densities set forth in both the County and City comprehensive plans), then the Executive's capacity analysis would show a net deficit of residential capacity. To avoid this situation, it may be appropriate to shift some areas back into UGA status rather than placing them in UGA Reserve status as recommended by the Executive.

Area Recommended to Be Removed from UGA

The Executive's Recommendation suggests that five acres located adjacent to the Sumas River should be removed from the UGA entirely. This reduction is acceptable to the City because the property does not have frontage directly onto a public street and because a portion of this property may be impacted by Swift Creek sediment. The removal of this area would add five acres to the agricultural land base.

Area East of Hovel Road Recommended to Be Placed in UGA Reserve

As part of the Executive's Recommendation, approximately 39 acres located on the east side of Hovel Road were recommended to be placed in UGA Reserve status. The City of Sumas supports this designation based on this area's being the City's lowest priority for future residential development and based on its current use for agriculture. The fact that this area is directly across the street from other areas included in UGA Reserve make it a likely candidate for future urban development based on the efficient provision of urban services and facilities, such as water, sewer and streets. For these reasons the City would not support non-UGA/non-UGA Reserve status for this area.

Area East of SR 9 and West of Hovel Road Recommended to Be Placed in UGA Reserve

The Executive's Recommendation would place this approximately 40-acre future residential area into UGA Reserve. This area is located directly south of the City's recently constructed park expansion and new ballfields. Therefore, it is seen as the most likely area for future expansion of the City. Based on the discussion included above regarding residential capacity, the City urges the County Planning Commission and Council to shift this logical expansion area back into full UGA status. Inclusion of this area in the Sumas UGA also makes sense to maintain logical outer boundaries for the UGA in relation to the adjacent future commercial area located just east of Highway 9.

Commercial Area Recommended to Be Retained in UGA

The City supports the Executive's recommendation to retain the future commercial area located on the east side of State Route 9 within the Sumas UGA. As was indicated in the City's UGA Proposal, this area was seen as the City's highest priority for retention. This future commercial area is especially important as the Sumas border crossing continues to expand.

Future Industrial Area – Proposed UGA Reserve

The City's UGA Proposal identified some significant undercounting of industrial (and commercial/retail) jobs reflected in the employment data compiled by the County's consultant. The Executive's Recommendation also acknowledged these likely inaccuracies. Over the past 20 years the Sumas industrial area has grown significantly, created nearly 400 jobs, and become an important job center for the county. To the extent that under-representation of industrial jobs contributed to an inappropriately low allocation of jobs to Sumas, designation of additional

industrial acreage as reserve may be appropriate. The City has identified a future industrial area located immediately west of the Sumas Industrial district. This 60 to 80-acre area not only has frontage on a City Street (Barbo Road), but also has direct access to one of the main rail lines that run through Sumas. This future expansion area was identified and discussed in the 2004 update of the Sumas comprehensive plan and was also analyzed in the County EIS for the 10-Year UGA Review. The City of Sumas urges the County Planning Commission and Council to designate this area as UGA Reserve, so that all potential impacts can be fully considered when expansion into this area is necessary at some time in the future.

Conclusion

The following lists summarize the aspects of the Executive's Recommendation that the City of Sumas supports or would encourage the County to adjust as the UGA review process moves forward:

Aspects of Recommendation supported by the City include:

- Removal of 5-acre property adjacent to the Sumas River.
- Designation of area east of Hovel Road as UGA Reserve.
- Retention in the UGA of the future commercial area located east of State Route 9.

Aspects of Recommendation that the City would like to see adjusted include:

- Switch the future residential area located east of SR 9, west of Hovel Road and immediately south of the City's new ballfields back to full UGA status.
- Designate a future industrial area located west of Barbo Road as UGA Reserve.

Respectfully submitted,



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