

Urban Growth Area Review

City of Lynden UGA / UGA Reserve Proposal

September 15, 2025

I. Introduction

The Growth Management Act (GMA) requires each county to designate urban growth areas (UGAs) within which urban growth will be encouraged (RCW 36.70A.110(1)). GMA planning goal 11 requires coordination between jurisdictions in the comprehensive planning process (RCW 36.70A.020(11)). Additionally, the GMA indicates that county and city comprehensive plans must be coordinated and consistent when they share common borders or related regional issues (RCW 36.70A.100). Therefore, Whatcom County and the cities have undertaken a joint planning process to allocate population, housing and employment growth, review permitted densities, and review UGA boundaries. The joint planning process includes a number of steps, including:

- Approval of interlocal agreements (2022).
- Preliminary County and city UGA population and employment proposals (2024).
- County Planning Commission review of preliminary city and County population and employment growth proposals (2024).
- County and city approval of non-binding multi-jurisdictional resolutions regarding preliminary population, housing and employment allocations (2025). See Whatcom County Council Resolution 2025-011.
- Draft Environmental Impact Statement (2025).
- Final Environmental Impact Statement (2025).
- City and County UGA boundary proposals (2025).
- County Planning Commission review (2025).
- County Council and City Council approval of comprehensive plans (2025-26).

UGAs must include areas and densities sufficient to accommodate the projected urban growth for the 20-year planning period (RCW 36.70A.130(3)), which extends through 2045. However, cities and the County are not required to plan for the future based solely upon past trends. Local government goals and policies, public input, new GMA requirements to plan for and accommodate housing for all economic segments of the community, infrastructure availability, capital facility planning, land capacity, and other factors are also taken into consideration.

Existing interlocal agreements indicate that the County and cities will work together to develop proposed population and employment allocations to UGAs and review UGA boundaries. The County and cities are recommending UGA boundary proposals for their respective UGAs. Review of these proposals includes opportunities for public comments and County Planning Commission recommendations. Final growth allocations and UGA boundaries will be adopted by the County Council in the Comprehensive Plan update in 2025 or 2026.

II. City Profile

The City of Lynden sits in the center of prime Whatcom County agricultural lands on a slight rise above the fertile bottom land of the broad Nooksack River floodplain. Lynden is in northwest Whatcom County, just 5 miles south of the Canadian border and 10 miles east of the Salish Sea (Birch Bay). The city is generally situated in an east-west orientation above the floodplain, with considerable commercial and industrial areas in the west, and a charming historic downtown with residential neighborhoods of various ages radiating from that downtown core.

Lynden tends to be a bedroom community, with amiable neighborhoods characterized by wide, well-maintained streets and public spaces. As Lynden looks to the next 20 years, it expects residential growth to continue in the northwest portion of the city (Pepin Creek Subarea) as well as infill locations across the city. Ongoing commercial and industrial opportunities abound along the Guide Meridian corridor and industrial properties to the west.

Like all of Whatcom County, Lynden has maintained a strong rate of growth for decades. Since the GMA was adopted in 1990, Whatcom County has added more than 100,000 residents. In that time, Lynden has nearly tripled its population – from 5,709 (1990) to 16,696 (2023) averaging around 300 new residents every year. Lynden has averaged an annual growth rate of ~2.5% since 2010. The Leland Technical Report (Population and Employment Projections) explains that Lynden (along with other small cities) has seen recent significant growth pressure during this time. In 2023, Lynden holds 7 percent of the County's population but has taken 12 percent of the last 10 years of county-wide growth – adding nearly 3,500 people since 2013.

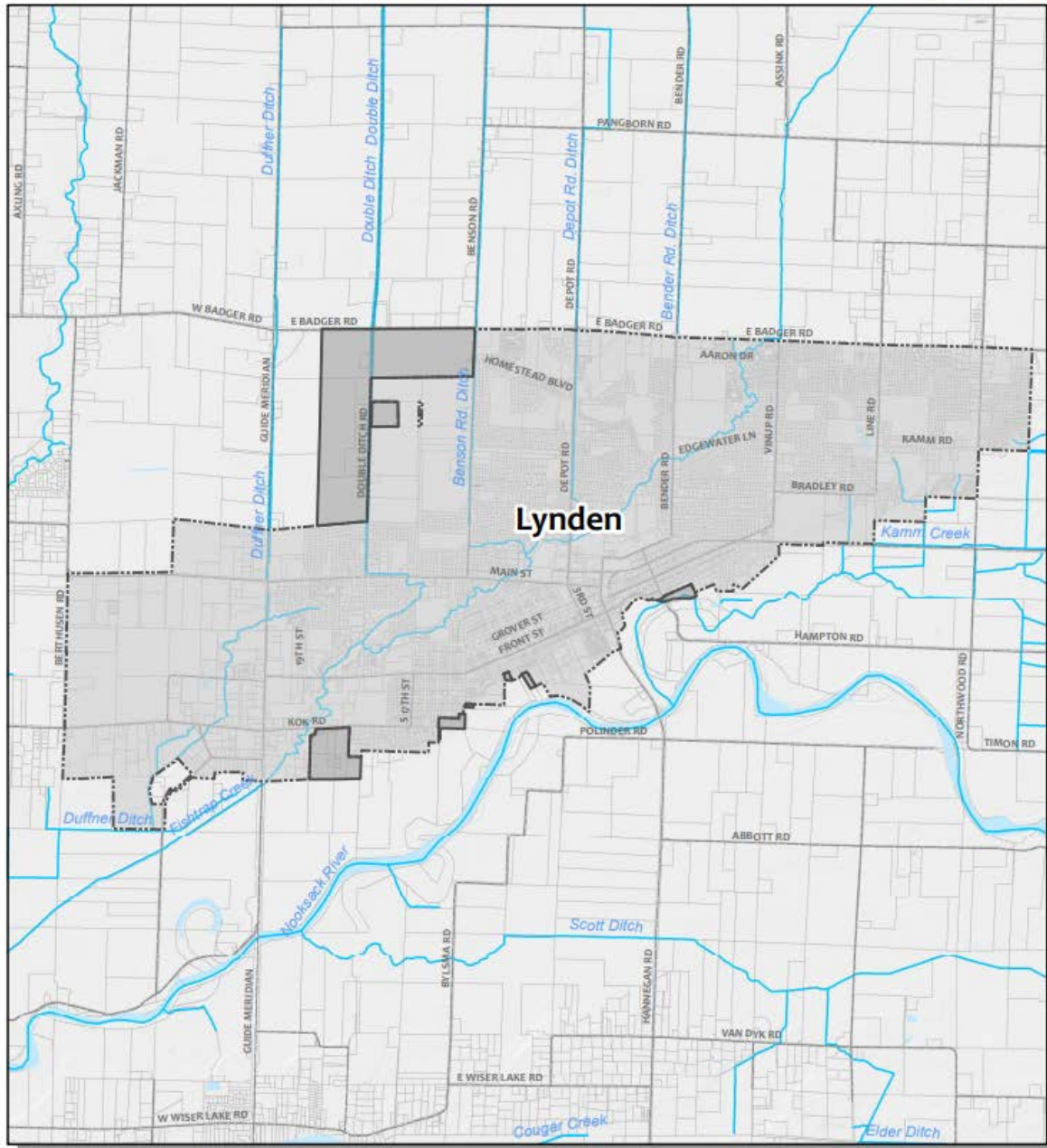
For planning purposes, the Technical Report allocates population growth estimates across Whatcom County according to past growth rates and the history of each UGA's share of the County's growth. The report considers low (1.1%), medium (1.5%), and high (2.2%) annual projections out to 2045. Using these scenarios, Lynden can be expected to add anywhere from 4,500 to 10,000 residents by 2045.

The City's preliminary proposal, after consideration, is the Technical Report Medium Growth Projection (1.5%). As historic growth rates are closer to the Technical Report high projection, the city's initial internal discussions focused on the high projection. After further consideration, the city is proposing planning for the medium projection for several reasons:

- Past growth pressure (above 2%) has continued to place significant demands on city services – particularly schools and transportation. Growth at this level is unsustainable without major investment in these areas.
- The majority of remaining vacant UGA land, particularly land that is available for residential growth, is more difficult to develop due to the need for major infrastructure improvements, and the presence of a high-water table and critical areas (Pepin Creek). While infill is expected to continue across the city, especially as new vacant lots become rare, infill projects can be

politically difficult. Furthermore, the city's new Mixed-Use Overlay (2022) can theoretically accommodate significant population growth, the overlay has not yet been tested.

- With the recent SW Lynden Annexation (2024), the city is reaching the western limits of its UGA boundary. Much of this annexed land is slated for industrial growth (~180 acres), which holds capacity for significant employment development. Recent industrial developments in West Lynden provide a wide variety of employment opportunity. Some projects, such as industrial freezers, tend to have a low number of employees for their size, other proposed projects (food processing, and Lynden Door expansions) provide jobs for hundreds of employees. Recognizing this variety, the city is proposing the Technical Report Middle Employment Growth allocation.



- Lynden Urban Growth Area



City of Lynden



Urban Growth Area

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III. Review of Permitted Densities

The GMA, at RCW 36.70A.130(3)(a), requires that:

Each county that designates urban growth areas under RCW 36.70A.110 shall review . . . its designated urban growth area or areas, patterns of development occurring within the urban growth area or areas, and the densities permitted within both the incorporated and unincorporated portions of each urban growth area. In conjunction with this review by the county, each city located within an urban growth area shall review the densities permitted within its boundaries, and 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.

Zoning districts and permitted densities in the city and the portion of the UGA within unincorporated Whatcom County are shown below.

<i>Table 1. Permitted Densities in the City</i>		
Zoning Abbreviation	Zoning	Permitted Densities
RS-100	Residential Single-Family	Minimum lot size 10,000 sq ft. Max 4 units/acre
RS-84	Residential Single-Family	Minimum lot size 8,400 sq ft. Max 4.5 units/acre
RS-72	Residential Single-Family	Minimum lot size 7,200 sq ft. Max 5 units/acre
RMD	Residential Mixed Density	Single-family detached, Single-family attached, Duplexes. Max 8 units/acre
RM-PC	Multi-Family Residential – Pepin Creek Subarea	Single-family detached, Single-family attached, multi-family (2-8 units/building). Max 12 units/acre
RM-1	Residential multi-family	Multi-family, Duplexes. Max 8 units/acre
RM-2	Residential multi-family	Multi-family, 4 units/building. Max 12 units/acre
RM-3	Residential multi-family	Multi-family, 12 units/building. Max 16 units/acre
RM-4	Residential multi-family	Multi-family, 30 units/building. Max 20 units/acre
MU Overlay	Mixed Use in qualifying Commercial Districts	Requires open space, flex space. Max 28 units/acre
HBD	Historic Business District	Downtown – Mix of office, personal services, small retail, and residences.
CSL	Commercial Services Local	Local scale retail, medical, professional, and financial services

CSR	Commercial Services Regional	Local and Regional scale commercial services, large format retail, regional commercial
ID	Industrial District	Industrial uses – regulated by industrial performance standards
IBZ	Industrial Business Zone	Light Industrial – allows a mix of industrial and commercial uses
PU	Public Use	Public and quasi-public areas – parks, open space, public buildings, cemeteries, NW WA Fairgrounds

Table 2. Permitted Densities in the UGA (outside the City)		
Zoning Abbreviation	Zoning	Permitted Densities
AG	Agriculture	1 dwelling/40 acres
UR4	Urban Residential	Maximum gross density: 4 dwelling units/1 acre, if public water and sewer are available Minimum net density: 4 dwelling units/1 acre, if public water and sewer are available 1 dwelling/10 acres, if public water sewer are not available
URM6	Urban Residential Medium Density	Maximum gross density: 6 dwelling units/acre and minimum net density: 6 dwelling units/acre, if public water and sewer are available. 1 dwelling/10 acres, if public water sewer are not available

IV. UGA Growth Allocation Proposal

This section of the proposal compares population and employment growth allocations in the 2025 City proposal to those in the non-binding multi-jurisdictional resolutions approved by the County and all cities in 2025. In Lynden's case, the City's 2025 proposal is the same as the multi-jurisdictional resolution.

Table 3. UGA Population Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	6,665
2	City Growth Allocation Proposal	6,665
3	Difference	0

Table 4. UGA Housing Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	3,535
2	City Growth Allocation Proposal	3,535
3	Difference	0

Table 5. UGA Employment Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	1,799
2	City Growth Allocation Proposal	1,799
3	Difference	0

V. UGA / UGA Reserve Boundary Proposal

The City of Lynden is proposing no changes to its UGA boundaries.

VI. Land Capacity Analysis Overview

A land capacity analysis compares the proposed growth allocations to the capacity of the UGA to accommodate growth. The land capacity analysis is an important tool for sizing UGAs. Land capacity analysis results for the 2025 City Proposal, based upon proposed UGA densities and boundaries, are shown below.

Table 6. Proposed UGA - Population Land Capacity Analysis Results		
1	Population Growth Capacity of Proposed UGA	7,082
2	Population Growth Allocation Proposed	6,665
3	Surplus (Deficit)	417

Table 7. Proposed UGA – Housing Land Capacity Analysis Results

Income Band (AMI)	Aggregated Housing Needs	Total Capacity of Proposed UGA	Surplus (Deficit)
0-80%	2,119	2,217	98
80-120%	319	1,207	888
120+ %	641	732	91
Total	3,079	4,156	1,077

NOTE: AMI means “Area Median Income”

The City of Lynden is proposing to adjust the allowed maximum density (from 28 units/acre to 40 units/acre) in its Mixed-Use Overlay districts. This proposal is to correct a deficit of housing unit capacity in the 0-80% AMI Income Band. The proposed land use change will allow for a greater number of high-density multi-family units to be built in the Mixed-Use Overlay. The above surplus numbers reflect this proposed land use change.

Table 8. Proposed UGA - Commercial/ Industrial Land Capacity Analysis Results		
1	Employment Growth Capacity of Proposed UGA	2,689
2	Employment Growth Allocation Proposed	1,799
3	Surplus (Deficit)	890

VII. Capital Facility Planning

The City and special districts, as applicable, have undertaken the following capital facility planning efforts in order to assure adequate public facilities and services are planned for the UGA.

Water – Lynden’s Water System Plan was updated in 2019 and concludes that the City has sufficient water supply and treatment capacity to satisfy projected demands. The city remains committed to working toward water right solutions, securing new water rights, increasing water conservation, and exploring innovative methods to increase its water supply (condensate of whey project, managed aquifer recharge, pressure zone adjustments, future storage).

Sewer – Lynden's General Sewer Plan was last updated in 2016. The City is planning several capital improvements over the planning period to meet projected demand. These include major Wastewater Treatment Plant renovations, upsizing collection mains, and pump station refurbishment.

Stormwater – Lynden's public stormwater utility (ROW facilities, and drainage easements) is operated, maintained, and upgraded by the City's Public Works Department. Private systems must meet regulations as determined by the DOE Stormwater Management Manual for Western Washington. Several projects have been planned to update existing drainage maps, address system capacity, improve treatment, and groundwater monitoring.

Fire Protection – Lynden operates its own Fire Department and maintains mutual aid agreements with the 12 other Fire/EMS County agencies for fire, hazardous materials, and EMS related emergencies. The Department is currently served by 13 career firefighters, 4 part-time firefighters, 1 volunteer firefighter, the Fire Chief, Assistant Fire Chief, and 1 Support Services Manager. The recently expanded firehouse in central Lynden is home to 3 aid units, 2 engines, and 1 Quint ladder truck. It maintains County levels of service standards.

Schools – Lynden is served by 3 school systems (2 private schools and the Lynden School District). The Lynden School District's 2023 Capital Facilities Plan identifies significant facility needs to accommodate the district's ongoing growth. These include renovations and additions to existing buildings, a new or replaced High School, a fourth elementary school, and securing property for future building needs.

Transportation – The City is updating its Transportation Element as part of the overall Comprehensive Plan update. This update proposes new multimodal levels of service and identifies transportation gaps, intersection improvements, and needed right of way improvements.

VIII. UGA Expansions into UGA Reserves (if applicable)

Is the City proposing to expand the UGA into the UGA Reserve?

No

IX. UGA Expansion in the Floodplain (if applicable)

Is the City proposing to expand the UGA into the floodplain?

No

X. UGA Expansions into Resource Lands (if applicable)

Is the City proposing to expand the UGA or UGA Reserve into lands designated as Agriculture, Rural Forestry, Commercial Forestry, or Mineral Resource Lands on the Whatcom County Comprehensive Plan map?

No

XI. UGA Swap (if applicable)

Is the City proposing a UGA swap under the GMA?

No

XII. Conclusions

Lynden has seen significant growth over the last 20 years. Much of this has been in new development areas as the city is now pushing to the edges of its Urban Growth Area boundaries. With what remains, and with the proposed maximum density change to the Mixed-Use Overlay, the city has adequate land capacity remaining in its UGA to accommodate projected growth for population, housing, and employment. Therefore, Lynden is not proposing boundary changes to its Urban Growth Area nor is it proposing adding any Urban Growth Area reserves.