

Urban Growth Area Review

City of Everson UGA/UGA Reserve Proposal

August 29, 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).

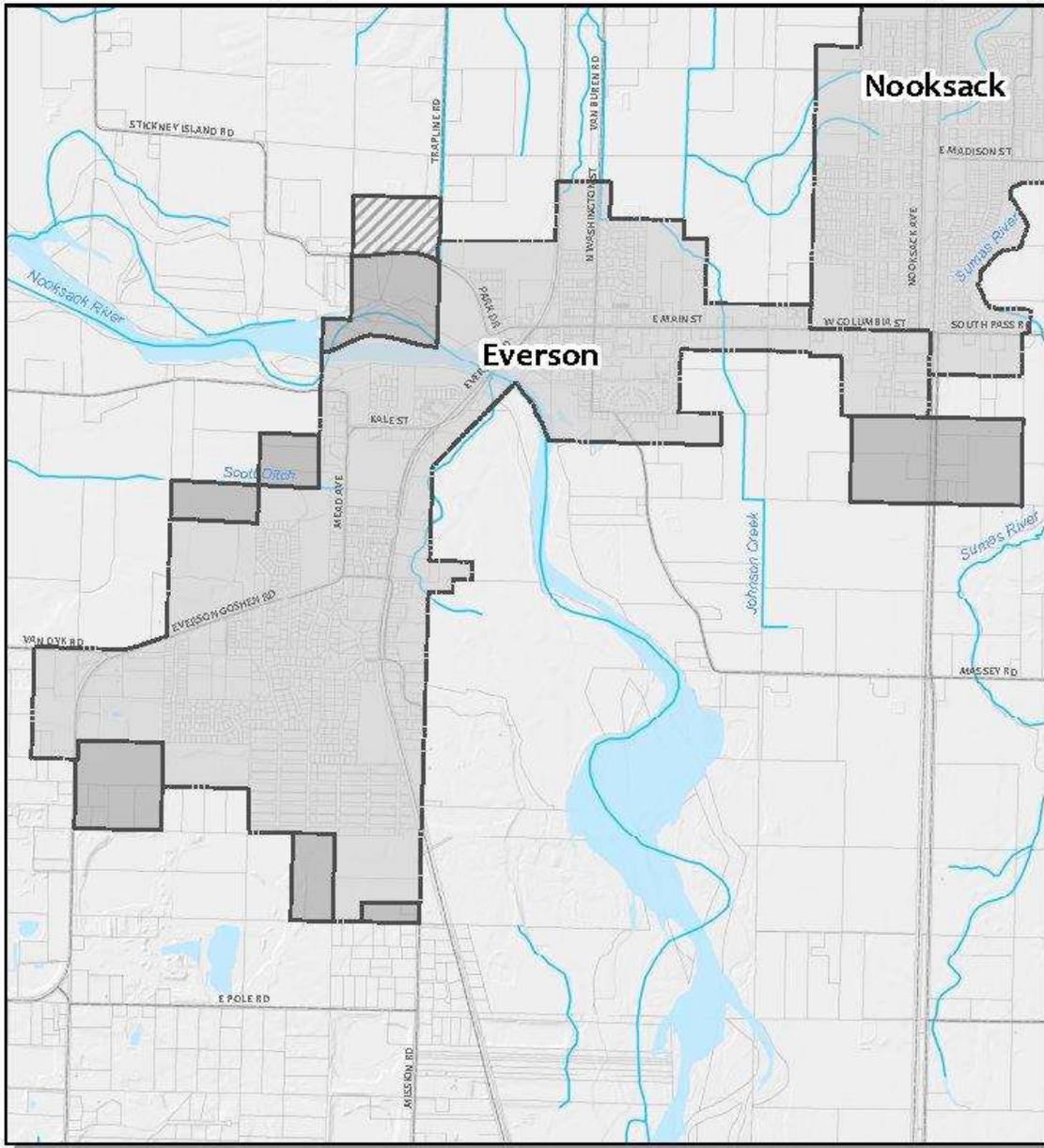
UGAs must include areas and densities sufficient to accommodate the projected urban growth for the 20-year planning period (RCW 36.70A.130(3)), which extends through 2045. However, cities and the County are not required to plan for the future based solely upon past trends. Local government goals and 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 Everson is a small town located near the center of the western half of the county. As of April 1, 2025, the population of Everson was 3,245. The current City limits include an area of approximately 1,025 acres. The town originally developed along a major transportation corridor from Bellingham to Sumas that included one of the major crossing points over the Nooksack River. Everson is situated just to the southwest of the neighboring city of Nooksack. State Highway 544 (Main Street) runs east and west through the center of town and is a major transportation route for both cars and trucks.

The Nooksack River bisects the town, and much of downtown Everson is within the 100-year floodplain. The majority of the undeveloped land within the City and its urban growth area are located within the 100-year floodplain or floodway.



- Everson Urban Growth Area

-  City of Everson
-  Urban Growth Area
-  Urban Growth Area Reserve

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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
R	Residential	Minimum lot size of 8,500 sq ft or 5 units/acre
R-7500	Residential-7500	Minimum lot size of 7,500 sq ft or 5 units/acre
RMU	Residential Multiple Use	Single-family and multifamily residential zone. For single-family, the minimum lot size is 8,500 square feet. For multifamily, the minimum lot size is 4,250 square feet per dwelling unit.

<i>Table 2. Permitted Densities in the UGA (outside the City)</i>		
Zoning Abbreviation	Zoning	Permitted Densities
AG	Agriculture	1 dwelling/40 acres
R5A	Rural	1 dwelling/5 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 and sewer are not available
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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.

Everson 2025 Proposal: The City’s proposal is the same as the non-binding, multi-jurisdictional resolutions approved by the County and all cities in 2025.

Table 3. UGA Population Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	1,408
2	City Growth Allocation Proposal	1,408
3	Difference	0

The City’s population growth allocation proposal reflects no change from the multi-jurisdictional resolution.

Table 4. UGA Housing Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	610
2	City Growth Allocation Proposal	610
3	Difference	0

Table 5. UGA Employment Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	602
2	City Growth Allocation Proposal	602
3	Difference	0

The population, housing, and employment growth allocations reflect no change from the multi-jurisdictional resolution growth allocations.

V. UGA / UGA Reserve Boundary Proposal

Everson is proposing 9 changes to the urban growth area (UGA) and UGA Reserve Boundaries. These changes can be broken down into 3 different categories:

1. UGA Removals

- a. Remove an approximately 18.9-acre portion of the northwest UGA, located south of Stickney Island Rd. This UGA lies almost entirely within the current effective FEMA floodway. This property is currently zoned as agriculture. FEMA Draft maps indicate that this property will be almost entirely within the future 100-Year floodplain. This property includes undevelopable river and critical areas.
- b. Remove an approximately 16.8-acre portion of the western UGA, just west of Mead Ave (SR 544). This property is currently zoned as agriculture. This UGA currently lies entirely within the 100-year floodplain. FEMA draft maps indicate that a significant portion of this property will be within the future FEMA floodway. Based on city information, this property contains Pangborn soil, which is unsuitable for future development.
- c. Remove an approximately 18-acre portion of the western UGA, just north of Everson-Goshen Rd (SR 544). This property is currently zoned agriculture. A portion of this UGA currently lies within the effective 100-year floodplain. FEMA draft maps indicate that the 100-year floodplain will expand and a portion of the UGA will contain the FEMA floodway. This UGA was purposefully left out of an annexation of the property south of it due to the Pangborn soils and floodplain presence that create an unsuitable location for development.
- d. Remove an approximately 11.9-acre portion of the current Everson UGA Reserve, located north of Stickney Island Rd. This property is not currently part of the county agricultural land base but is proposed to be redesignated to agriculture. This portion of the UGA Reserve contains the effective 100-year floodplain. FEMA draft maps indicate that the 100-year floodplain will expand in this property.

2. UGA Additions

- a. Convert an approximately 15.7-acre portion of the current Everson UGA Reserve to full UGA status. This UGA Reserve has existed since 2004 and provides easy access to the downtown corridor. The city has not included any portion of the UGA Reserve that contains the effective 100-year floodplain in this proposal. The current future zoning for this area is residential.
- b. Add an approximately 34.14-acre portion of a larger property to the UGA. This property is currently zoned as agriculture and is located northwest of current city limits, adjacent to SR 544. The city has not included a portion of the property occupied by an existing conservation easement and has only included developable areas. This property aligns with the city's vision to move west, outside of existing and future floodplains. The proposed future zoning is residential, however,

inclusion of some commercial zoning along SR 544 is also under consideration.

- c. Add an approximately 20.13-acre property to the UGA. This property is currently zoned Rural-5 and is located west of current city limits, adjacent to SR 544 and Van Dyk Rd. This location aligns with the city's vision to move west, outside of existing and future floodplains. The property is one of the few surrounding locations around the city that is not zoned agriculture, which aligns with the county's goal to maintain the current agricultural land base. County GIS has identified critical areas within this location. However, the city has information that differs from this conclusion. This location does not include any streams, steep slopes, floodways/floodplains, or alluvial fans. A small, low-value wetland exists in the northwest portion of the property. Therefore, the city believes that this property would provide the City good, developable land. The proposed future zoning for this area is residential.

3. UGA Reserve Additions

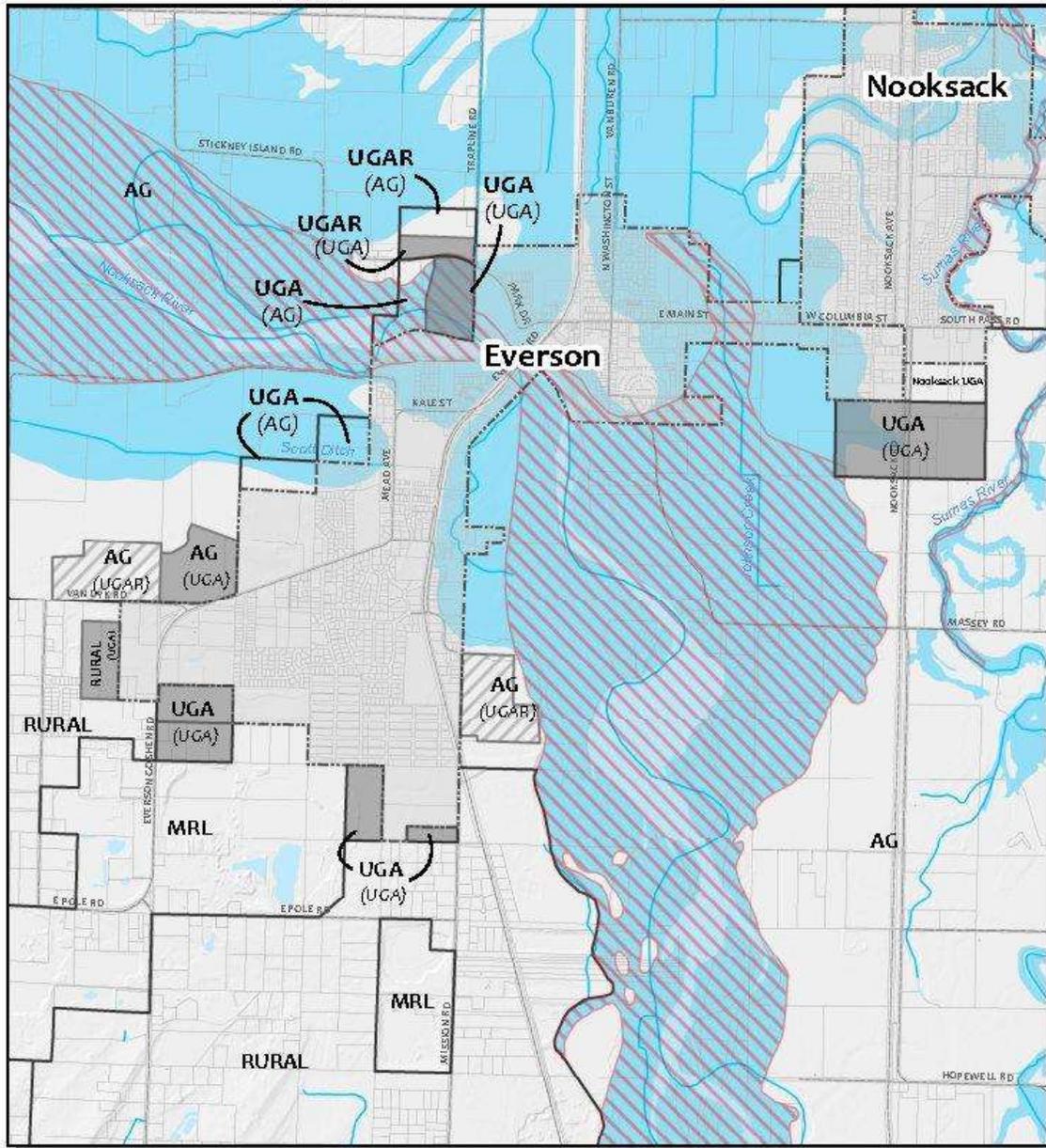
- a. Add an approximately 38.74-acre property to the UGA Reserve. This property is currently zoned as agriculture and located east of the current city limits, adjacent to Mission Rd. The City has not included the effective and future floodplain/floodway in this proposal. The City has available utilities adjacent to this property along Mission Rd. The proposed future zoning for this area is residential.
- b. Add an approximately 42.13-acre property to the UGA Reserve. This property is currently zoned as agriculture and located north of the current city limits, along Van Dyk Rd. This location aligns with the city's vision of moving west, outside of existing and current floodplains. The proposed future zoning for this area is residential.

In the past 2 years, Everson has experienced an unprecedented amount of growth and development. Future projects (see Table 6) show that since 2023, Everson has added approximately 67 units, which is around 192 people. Using this same future project list, the City expects to add 447 more units in the next 10-12 years. When applying Everson's average household size of 2.88 people, this adds an additional 1,287 people. Adding this together, this equates to 1,479 people in the next 10-12 years, surpassing the proposed 22-year population growth allocation.

If this trend of increased development continues, Everson will need to make accommodations for more land capacity for an increased population. In anticipation of increased growth, the City has taken actions to increase residential densities. These include lowering the minimum lot size, providing opportunities for planned unit developments, and encouraging zero lot-line residences. See Table 6 for more information on specific ongoing and future projects.

Table 6. Proposed and Completed Projects Post April-2023

Project Name	Proposed # of Additional Units	Status
Beverly Estates	15	Complete
Hougens Landing	73	Preliminary Approval
Everson Meadows	4	Pending Approval
Robinson Townhomes	1	Under Construction
Blankers Crossing	57	Under Construction
DeHoog Property	98	Pending Approval
Emerson Rd Property	12	Pre-Application
Greens Ln SP	38	Pre-Application
Tjoekler Property	15	Preliminary Approval
Quarterhorse Plat	100	Pre-Application
Hawks landing	15	Complete
Mateo Meadows	38	Under Construction
Fieldview Terrace	8	Preliminary Approval
Younkin SP	3	Preliminary Approval
MJ Short Plat	5	Complete
Vermeulen SP	3	Complete
Kelto Holdings	11	Complete
Colton Ln Duplexes	16	Complete
Baker St Duplex	2	Complete
TOTAL	514	



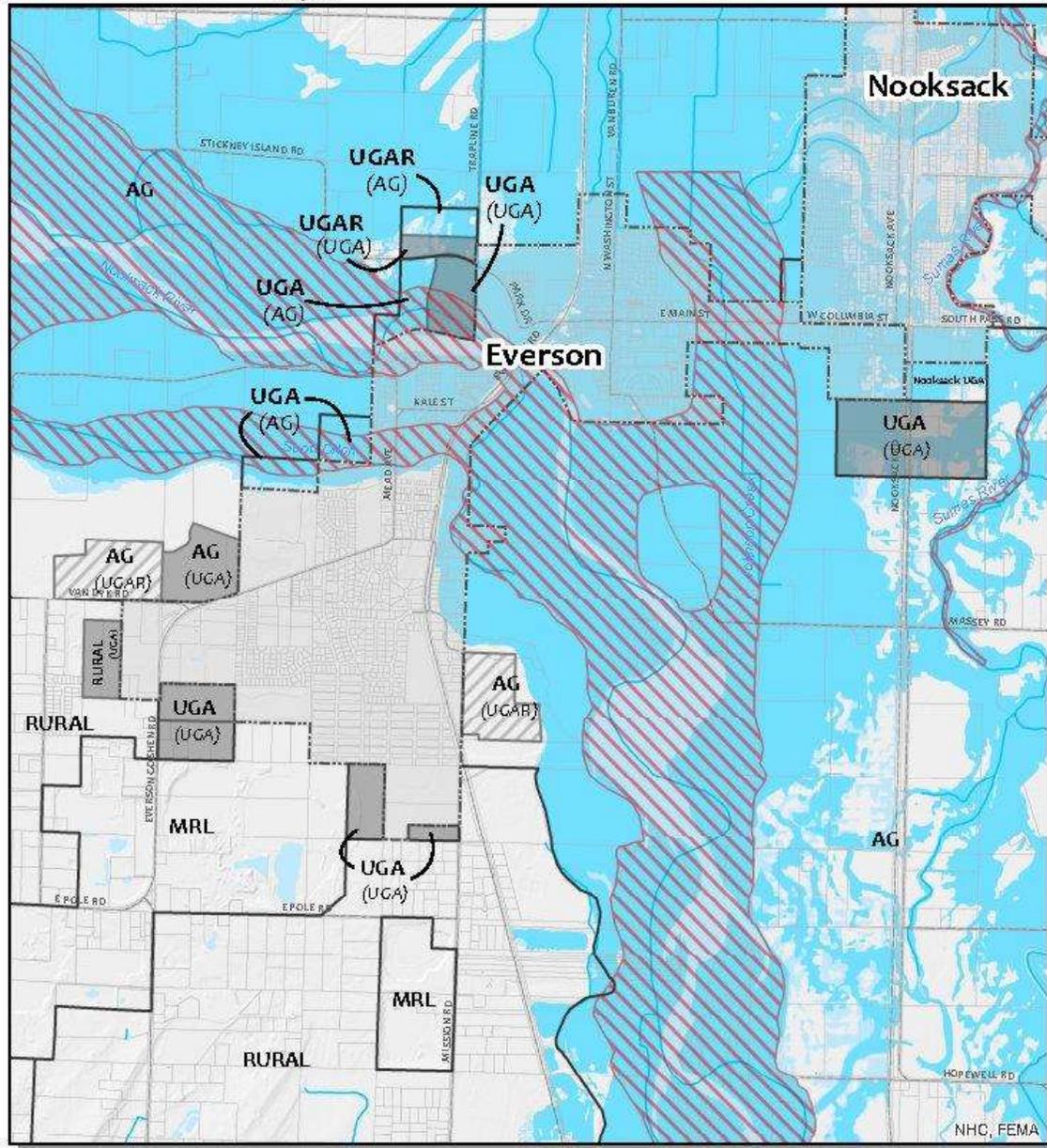
- Everson Urban Growth Area

-  City of Everson
-  Proposed Urban Growth Area
-  Proposed Urban Growth Area Reserve
-  Comprehensive Plan Designations (Proposed in *()*, Current in **bold**)
- Net change in AG designation - 45 ac. to UGA/UGAR
-  Effective Floodway
-  Effective Flood Zone

USE OF WHATCOM COUNTY'S 2025 COMPREHENSIVE PLAN DESIGNATIONS IS SUBJECT TO THE COUNTY'S 2025 ZONING ORDINANCE.

Whatcom County shall not be held liable for any errors or omissions in this map. The representation of zoning in this map is for informational purposes only. The map is not intended to be used for any other purpose. The map is not intended to be used for any other purpose. The map is not intended to be used for any other purpose.



- Everson Urban Growth Area

- City of Everson
 - Proposed Urban Growth Area
 - Proposed Urban Growth Area Reserve
 - Comprehensive Plan Designations (Proposed in *()*, Current in **()**)
 - Draft Floodway (2024-2025)
 - Draft SFHA (2024-2025)
 - Nookack 1p75x 100 Year Flood
- Net change in AG designation - 45 ac. to UGA/UGAR

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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 7. Proposed UGA - Population Land Capacity Analysis Results		
1	Population Growth Capacity of Proposed UGA	2138
2	Population Growth Allocation Proposed	1408
3	Surplus (Deficit)	730

The proposed UGA would create a population capacity surplus of 730 people. While this would create a modest surplus of capacity, city trends have indicated that the city will reach the proposed allocation growth of 1,408 in the next 10-12 years (see Table 6). A population capacity surplus would allow Everson to accommodate the expected increase in growth.

Table 8. Proposed UGA – Housing Land Capacity Analysis Results

Income Band (AMI)	Aggregated Housing Needs	Total Capacity of Proposed UGA	Surplus (Deficit)
0-80%	408	411	3
80-120%	79	266	187
120+%	124	330	206
Total	611	1024	396

NOTE: AMI means "Area Median Income"

The proposed UGA expansions will create a surplus in all income bands.

Table 9. Proposed UGA - Commercial/Industrial Land Capacity Analysis Results		
1	Employment Growth Capacity of Proposed UGA	897
2	Employment Growth Allocation Proposed	602
3	Surplus (Deficit)	295

Based on the City’s proposed employment growth allocation, the current Everson UGA contains sufficient capacity to accommodate planned employment growth plus a modest surplus. The proposed UGA expansion is not anticipated to expand the industrial land base.

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 – The City is currently in the progress of updating the Water System Comprehensive Plan. This plan has used the city proposed population and employment projections for its future growth analysis. It is anticipated that this plan will show that the city has enough capacity to accommodate planned growth. The City anticipates adopting the Water System plan prior to the adoption of the Comprehensive Plan. Approval from the Washington Department of Health will likely not occur till 2026.

Sewer - The City is currently in the progress of updating the General Sewer Plan. This plan has used the city proposed population and employment projections for its future growth analysis. It is anticipated that this plan will show that the city has enough capacity to accommodate planned growth. The City anticipates adopting the General Sewer Plan prior to the adoption of the Comprehensive Plan.

Stormwater - Capital facilities related to stormwater are addressed in the Capital Facilities Element of the City’s comprehensive plan. This information will be updated as part of the 2025 update of the City’s comprehensive plan. City code requires developers to address stormwater requirements in compliance with stormwater manual.

Fire Protection - It is anticipated that Whatcom Fire District 1 will prepare a capital facilities plan prior to December 2025. The City will support the district’s efforts to complete this plan.

Schools – Nooksack Valley School District has prepared and approved a capital facilities plan in February of 2025.

Transportation - Capital facilities related to the City's transportation system are addressed in the Transportation Element of the City's comprehensive plan. The City will update this information as part of its 2025 comprehensive plan update process.

VIII. UGA Expansions into UGA Reserves (if applicable)

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

Yes.

Whatcom County Comprehensive Plan Chapter 2 contains criteria for transferring properties from the UGA Reserve to UGA. The general criteria are set forth below:

1. Need for Land Capacity. The need for additional land is necessary to accommodate projected urban growth, as documented in a land capacity analysis. A transfer from Urban Growth Area Reserve to Urban Growth Area will not be allowed which would provide capacity to accommodate substantially more than 20 years of urban growth. Additional consideration can be made regarding the mix of housing and employment opportunities that are required to serve the Urban Growth Area which could be accommodated in the Urban Growth Area Reserve and which cannot be accommodated within the Urban Growth Area.

City Comments: Everson has experienced an unprecedented amount of growth in the last 2 years. The land capacity for the existing city UGA shows a modest deficit. Therefore, conversion of the UGA Reserve to UGA is warranted. The City believes that based on current development trends, the projected growth to accommodate (1,408 people) will be surpassed within the next 10-12 years. Therefore, there is a need for additional land to accommodate this increased growth. This location would also be the closest developable UGA to the downtown economic corridor.

2. Adequate Public Facilities and Services. There are plans and capacity to serve the areas with urban governmental services as set forth in the Growth Management Act. There is no requirement to extend these services prior to transferring the area from Urban Growth Area Reserve to Urban Growth Area, but the Capital Facility Plans must document the capacity and plans to serve at urban levels of service within the 20-year planning period.

City Comments: The city is currently working on updating the Water System Plan and General Sewer Plan. Both of these plans have included this proposed UGA as an area to serve and to accommodate planned growth.

3. Land Use Plans. The respective city, or county for unincorporated Urban Growth Areas, has a comprehensive plan and land use regulations in place to allow for the transition from Urban Growth Area Reserve to Urban Growth Area. The respective jurisdiction will also have in place development regulations that ensure urban densities are achieved within the existing Urban Growth Area. Urban Growth Area Reserves should be jointly planned between Whatcom County and the respective city.

City Comments: The future zoning designation for the UGA Reserve is Residential, as established in the 2016 Everson Comprehensive Plan.

4. Natural Resource Lands. Expansion into the Urban Growth Area Reserve will not allow uses that are incompatible with adjoining natural resource lands unless mitigated through buffers, increased setbacks or other measures as necessary to maintain the productivity of the adjacent resource lands. If the expansion is into lands zoned Agricultural, the city and county shall have an interlocal agreement or regulations in place that implement a program that outlines the respective roles in protecting at least 100,000 acres of agricultural land in Whatcom County.

City Comments: This property is zoned as agriculture but is currently located in Everson's UGA Reserve, which means it is not included in the current agricultural land base. Therefore, adding this property will not reduce the agricultural land base of the county. In addition, the city is proposing to remove the northern portion of the UGA Reserve (Approximately 11.9-acre) and add it back into county agricultural land.

5. Environment. Land use regulations are in place to ensure protection of the environment and sensitive watersheds.

City Comments: The city has removed almost all floodplains from this UGA proposal. The only existing critical area is in the southeast corner of the property, which contains a small portion of the effective FEMA floodway. The city believes it is important to include this portion of the property to maintain clean city limit boundaries. The City is proposing

to establish development restrictions on that portion of the property within the floodplain.

6. Open Space Corridors. Continued provisions are made for open space corridors within and between Urban Growth Areas where not otherwise precluded by previous development patterns.

City Comments: There are no open space corridors near this UGA proposal. The Nooksack River corridor, Riverside Park, and planned park expansion are located south of this property.

Whatcom County Comprehensive Plan Chapter 2 also contains specific criteria for transferring UGA Reserve to UGA. These criteria are set forth below:

Everson Urban Area

Land to the north of Everson along Trap Line Road is designated as Urban Growth Area Reserve. This area was previously designated as agricultural lands of long-term commercial significance. The Everson UGA has been reduced in other areas and those lands were put into agricultural lands of long-term commercial significance, thus not causing a reduction in the resource land designations in the Everson area. The Urban Growth Area Reserve should be jointly planned with the city and county in conjunction with Urban Growth Area plans.

City comments: The current Urban Growth Area Reserve (also known as the "Postma Property") was put into the UGA Reserve in 2004 for future growth in Everson. This property is not included in the agricultural land base and it's addition to the Everson UGA will not reduce any resource land designations. In addition, Everson is proposing to remove 65.6 acres of agricultural land in the current UGA. Following the land suitability analysis and county comments, the city has also adjusted boundaries for this proposed UGA to remove all areas within the effective 100-year floodplain. The city is prepared to work jointly with the County to establish zoning and development regulations for this property and other UGA expansions.

IX. UGA Expansion in the Floodplain (if applicable)

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

Yes

If expanding UGA into a floodplain, explain how the proposal meets the requirements of RCW 36.70A.110(10).

The City is proposing to add the southern portion of the current UGA Reserve into the UGA. A very small portion of floodway encroaches onto the southeast corner of the proposed UGA. This floodway encroachment is approximately 3,000 sq ft into the proposed UGA parcel boundaries. The city is proposing this southwest corner of the UGA be included to maintain clean city boundaries and provide access and utilities to the developable portion of the expansion area. The city has proposed that development restrictions on the floodway portion be put in place for this proposed UGA expansion.

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?

Yes, the Everson proposal is to expand the UGA and UGA Reserve into Agricultural Lands.

The City recognizes Whatcom County's goal of maintaining an agricultural land base of 100,000 acres. The Everson proposal includes an addition of 65.6-acres to the agricultural land base from both the current Everson UGA and UGA Reserve, in exchange for 34.14-acres of county agricultural land to be added to the UGA and 80.86-acres of agricultural land to be added to the UGA Reserve. UGA and UGA Reserve additions will create a reduction of 49 acres. However, UGA Reserve lands will remain as operable agricultural lands until they are brought into the UGA. The City is also proposing that owners of these properties be required to make a payment in lieu into the county Conservation Futures Fund to help retire development rights in agricultural areas.

Policy #1: *Not already characterized by urban growth.* Pursuant to the RCW 36.70A.030(48), "urban growth" refers to "growth that makes intensive use of land for the location of buildings, structures, and impermeable surfaces to such a degree as to be incompatible with the primary use of land for the production of food, other agricultural products, or fiber . . .". While a majority of the proposed UGA additions are adjacent to major highways or collector roads, the areas themselves do not contain urban growth, but rather contain a combination of agricultural and rural residential growth. Whatcom County Policy describes the policy as areas "not already characterize by urban growth". The aforementioned RCW goes on to define that criteria as "land having urban growth located on it, or to land located in relationship to an area with urban growth on it as to be appropriate for urban growth.". As mentioned previously, these areas are all adjacent to a major highway or an arterial. These areas also abut current city limits. In addition to the geographic location of these areas, city utilities are available in the adjacent right-

of-way. Based on the location of these expansion areas and location of public utilities, this expansion area is already characterized by urban growth and is deemed appropriate for urban growth based on the criterion laid out in the Whatcom County natural resource de-designation policies.

Policy #2: *The land is used or capable of being used for agricultural production.*

All proposed UGA areas are currently used for agricultural production and will remain as such until official annexation into Everson.

Policy #3: *The land has long term commercial significance for agriculture.* In determining this factor, consider the following nonexclusive criteria:

1. The majority of the area contains Prime Farmland Soils as determined by the Natural Resource Conservation Service (NRCS).
2. The area may contain 100-year floodplains as delineated by the Federal Emergency Management Agency (FEMA).
3. Land use settlement patterns, the intensity of nearby uses, and the history of approved land development permits are generally compatible with agricultural practices.
4. A majority of the area is composed of agricultural operations that were historically in agriculture prior to 1985.
5. The predominate parcel size in the area is large enough to adequately maintain agricultural operations.
6. The availability of public services.
7. The availability of public facilities such as roads used to transport agricultural products.
8. Special purpose districts that are oriented to enhancing agricultural operations such as drainage improvement, watershed improvement, and flood control exist.
9. The area has a pattern of landowner capital investment in agricultural operations improvements including irrigation, drainage, manure storage, the presence of barns and support buildings, enhanced livestock feeding techniques, agricultural worker housing, etc.
10. The area contains a predominance of parcels that have current use tax assessment derived from the Open Space Taxation Act.
11. The area's proximity to urban growth areas.
12. The area's proximity to agricultural markets.
13. Land value under alternative uses.

This section analyzes the above criteria.

- All proposed UGA and UGA Reserve expansions do contain prime farmland soils. However, much of the land surrounding Everson and throughout Whatcom County.
- All proposed UGA and UGA Reserve expansions do not contain the 100-year floodplain.
- All UGA and UGA Reserve expansions are adjacent to development projects currently ongoing within Everson city limits.

- All UGA and UGA Reserve expansions are currently used for agricultural operations. These operations will likely continue until official annexation into the City.
- All UGA expansions are primarily in proximity to city urban lots or agricultural parcels that are less than 40 acres. UGA Reserve expansion areas do have some proximity to agricultural parcels that are more than 40-acres. However, these areas also abut Everson urban areas, the Nooksack Tribe Reservation, and small lots used for residential purposes.
- All UGA and UGA Reserve expansions have current or future access to public utilities.
- All UGA and UGA Reserve expansions have access to public facilities, such as roads. SR 544, a high-volume freight route, runs right through Everson. Most UGA expansions either abut SR 544 or abut collector roads that feed into SR 544.
- All UGA and UGA Reserve expansions have portions that are in special purpose districts.
- All UGA expansions do not have significant capital investment into agricultural operations. UGA Reserve expansions do have capital investment into agricultural operations. However, as mentioned above, these agricultural operations are likely to continue until official annexation into the city.
- All UGA and UGA Reserve expansions have a significant portion of parcels that are included in the Open Space Current Use Program.
- All UGA and UGA Reserve expansions abut current Everson city limits.
- Land Value under alternative uses is likely to increase for all UGA and UGA Reserve expansion areas.

Given all of the above criteria, the City has come to the determination that all the areas, especially those proposed to be added to the UGA, do not have long-term commercial significance for agriculture.

Based on the information provided above, the City believes that the proposed UGA and UGA Reserve expansions are consistent with the natural resource designation policies outlined in the Whatcom County Comprehensive Plan.

XI. UGA Swap (if applicable)

Is the City proposing a UGA swap under the GMA?

No.

XII. Conclusions

Based on the results of the County's land capacity analysis, the current Everson UGA does not contain sufficient capacity to accommodate the housing needs for the

0-80 AMI income band. While there is a modest surplus in population capacity, the City is projecting that the population growth projection will be surpassed within the next 10-12 years. The City is also looking to shift development outside of the floodplain. Therefore, the City's 2025 UGA Proposal includes a number of proposed changes intended to ensure that the Everson's UGA will have sufficient capacity to accommodate proposed growth through 2045. These proposed changes, which have been modified following county comments and a suitability analysis, include the following:

- Increasing residential densities.
- Adding a 15.79-acre portion of the current Everson UGA Reserve into the UGA; This 15.79-acre portion will not cause any reduction in county agriculture land. The remaining 11.9-acre portion of the current UGA Reserve will be added back into the county as agriculture land.
- Removing 53.7-acres of the current Everson UGA, which will be added back into the county as agricultural land. These areas are all within the effective and draft floodplain/floodway and have been deemed as unsuitable for residential or commercial development.
- Adding 34.14-acres of county agricultural land into the UGA. This property is proposed to have a future zoning designation of residential and is in line with the city's vision of moving development outside of the floodplain.
- Adding 20.31-acres of county rural land into the UGA. This property is proposed to have a future zoning designation of residential and is in line with the city's vision of moving development outside of the floodplain.
- Adding 80.87-acres of county agricultural land into the UGA Reserve. These properties are outside of the floodplain and are in line with the city's vision of moving development outside of the floodplain. Future zoning for both areas is proposed to be residential.
- Require landowners to provide a payment in lieu into the County Conservation Futures Fund to help retire development rights in agricultural areas.

With the changes included in the Everson UGA Proposal, the Everson UGA would have sufficient capacity to accommodate the population and employment growth allocations proposed by the City. This proposed UGA will also allow Everson to grow outside of the floodplain.

Urban Growth Area Review

City of Everson UGA/UGA Reserve Proposal Addendum

October 17, 2025

I. Introduction

On August 29, 2025, the City of Everson submitted its UGA and UGA Reserve proposal to Whatcom County as a part of the 2025 review and update of the city and county's comprehensive plans.

In an email correspondence dated September 4, 2025, Whatcom County Planning and Development Services provided a list of issues/concerns related to the City's UGA proposal. City staff met with the County Planning Director and Senior Planner on September 8, 2025, to discuss these concerns and provide the county with preliminary responses to the points raised in the email.

The purpose of this UGA proposal addendum is to provide supplemental information to address these concerns to allow the City's UGA proposal to move forward in the planning process.

In a subsequent message from the county dated October 1, 2025, County planning requested that the City address Whatcom County Planning Policy 8A-6 related to de-designation of agricultural lands and changed circumstances. This addendum also addresses that policy.

After a suggestion to remove the UGA Reserves, the City is formally withdrawing the UGA Reserve proposal areas to further support agricultural operations within agriculturally zoned areas.

II. Proposal Summary

Everson is a small city currently experiencing a significant increase in population growth. As of April 2025, Everson had a population of 3,245 people. To accommodate this increase in population growth, Everson is planning for an expansion of their UGA to the west of town.

Much of Everson's city limits are within the Nooksack River floodplain. This floodplain is located predominantly on the eastern side of town. The city is committed to discouraging development within the floodplain and developing westward. To accomplish this goal, the city is proposing an addition of 70.25 acres of UGA outside of the floodplain. 15.79 acres of that are from the current UGA Reserve.

As stated above, Everson wants to grow outside of the floodplain. However, much of Everson is surrounded by Agricultural or Mineral Resource Lands.

34.14 acres of the UGA proposal are designated as county agricultural lands. To accommodate a growing town without further developing in critical areas, Everson's only option is to grow into agricultural lands.

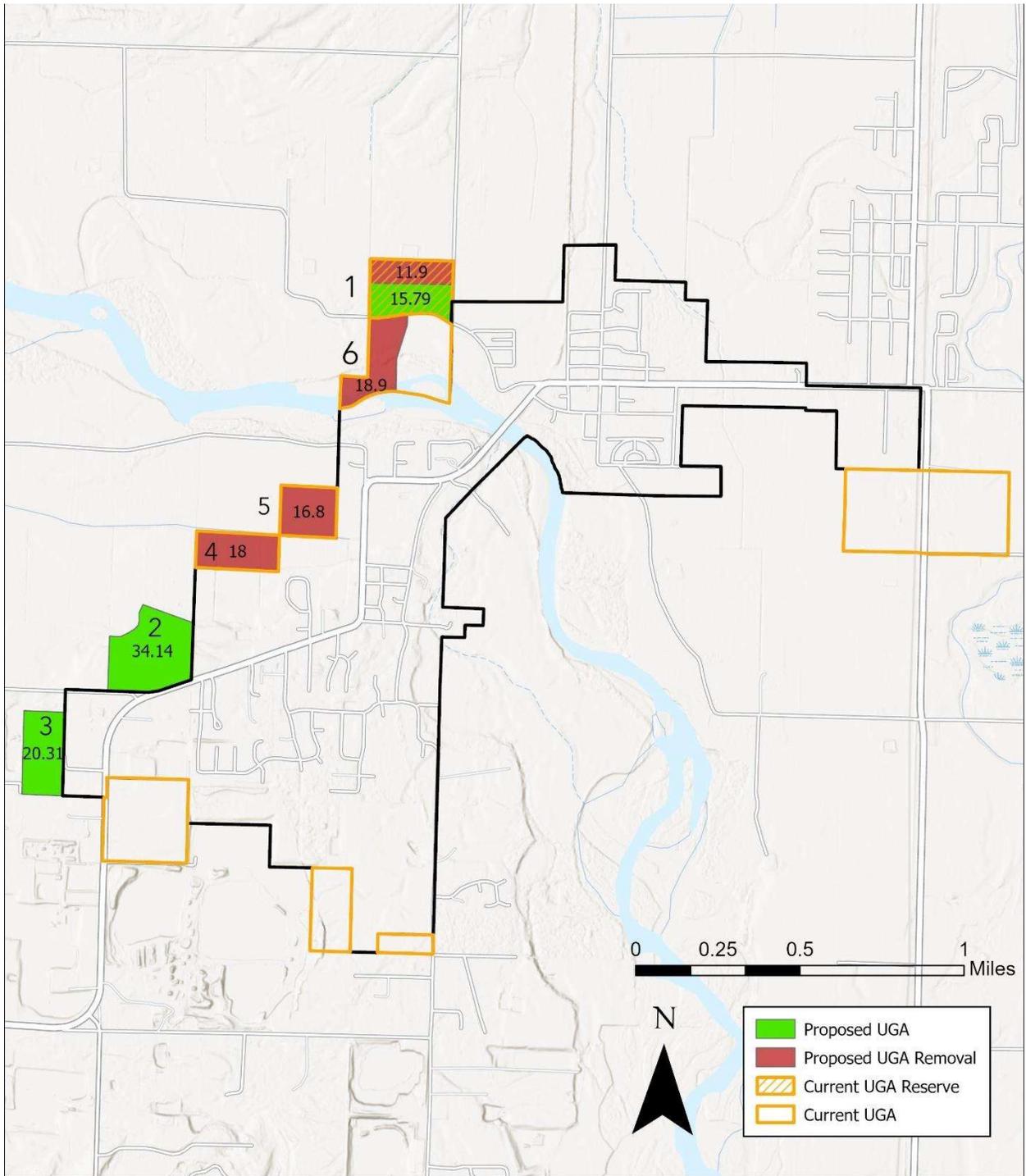
III. Proposal Breakdown

Everson is proposing several changes to the urban growth area (UGA) and UGA Reserve Boundaries. These changes include:

- 70.25 acres added into the UGA
 - 15.8 acres from UGA Reserve
 - 20.31 acres from Rural-5
 - 34.14 acres from Agriculture
- 65.6 acres removed from current UGA and UGA Reserve
 - All Agriculture zoning

Overall, the UGA proposal will create a net gain of 31.5 acres of agricultural land for the county. Figure 1 shows the locations of the proposed UGA expansion areas.

Figure 1. Proposed UGA Expansions



Proposed UGA and UGA Reserve Boundaries

IV. County Planning Concerns

After an initial review of Everson’s UGA/UGA Reserve Proposal, Whatcom County Planning raised several concerns. These are addressed below:

Population and Employment Surplus

In the multi-jurisdictional resolution passed earlier this year, Everson was allocated a population growth of 1,408 people and 610 housing units from 2023-2045. After adjusting the Land Capacity Sheet, the City is showing a population deficit and modest surpluses of employment and housing units. Tables 1-3 show the results of these analyses.

It is important to consider the city’s responsibility to comply with HB 1220. This bill requires that jurisdictions show they can accommodate low-income housing. Due to this, Everson is required to accommodate 611 housing units. This equates to a population capacity of more than 1,800 people. When complying with this requirement, other capacity numbers may be misrepresented.

Table 1. Proposed UGA Employment Capacity

Proposed UGA - Commercial/Industrial Land Capacity Analysis Results		
1	Employment Growth Capacity of Proposed UGA	791
2	Employment Growth Allocation Proposed	602
3	Surplus (Deficit)	189

Table 2. Proposed UGA Population Capacity

Proposed UGA - Population Land Capacity Analysis Results		
1	Population Growth Capacity of Proposed UGA	1241
2	Population Growth Allocation Proposed	1408
3	Surplus (Deficit)	(167)

Table 3. Proposed UGA Housing Unit Capacity

Income Band (AMI)	Aggregated Housing Needs	Total Capacity of Proposed UGA	Surplus (Deficit)
0-80%	408	420	12
80-120%	79	98	19
120+%	124	190	66
Total	611	708	96

Setback/Buffering from Ag Lands

The City’s UGA proposal includes a property that is adjacent to agricultural lands and areas characterized by urban growth. The property, shown as Area 1 on Figure 1, abuts Stickney Island Rd and Trapline Rd on the South and East sides, respectively. The property to the north is owned by the same property owner as Area 1. In the past, the City has not seen any conflicts between residents within the city regarding surrounding agricultural operations. The City has adopted “Right-to-Farm” provisions, codified under 16.12.076(B) EMC. This provision ensures that required notifications of nearby agricultural activities are fully disclosed to future buyers.

To protect areas that abut natural resource lands, the City will consider requiring increased setbacks to ensure the productivity of these agricultural lands. These setbacks will be determined from future discussions between the City and the County.

Floodplain/Floodway

As stated previously, the city is committed to developing outside of the floodplain. All UGA proposals on the west side of town are completely out of the effective and draft floodplain/floodway. The UGA proposal on the northwest side of town (Area 1) includes a very small portion of floodplain. This proposed UGA is currently located within the UGA Reserve. When developing the boundaries for this UGA, the city worked to configure the boundaries to exclude any floodplain. However, there is a small encroachment of floodway that intersects with the southeast corner of the property. This floodway is approximately 2,000 sqft, or approximately 0.29% of the property area.

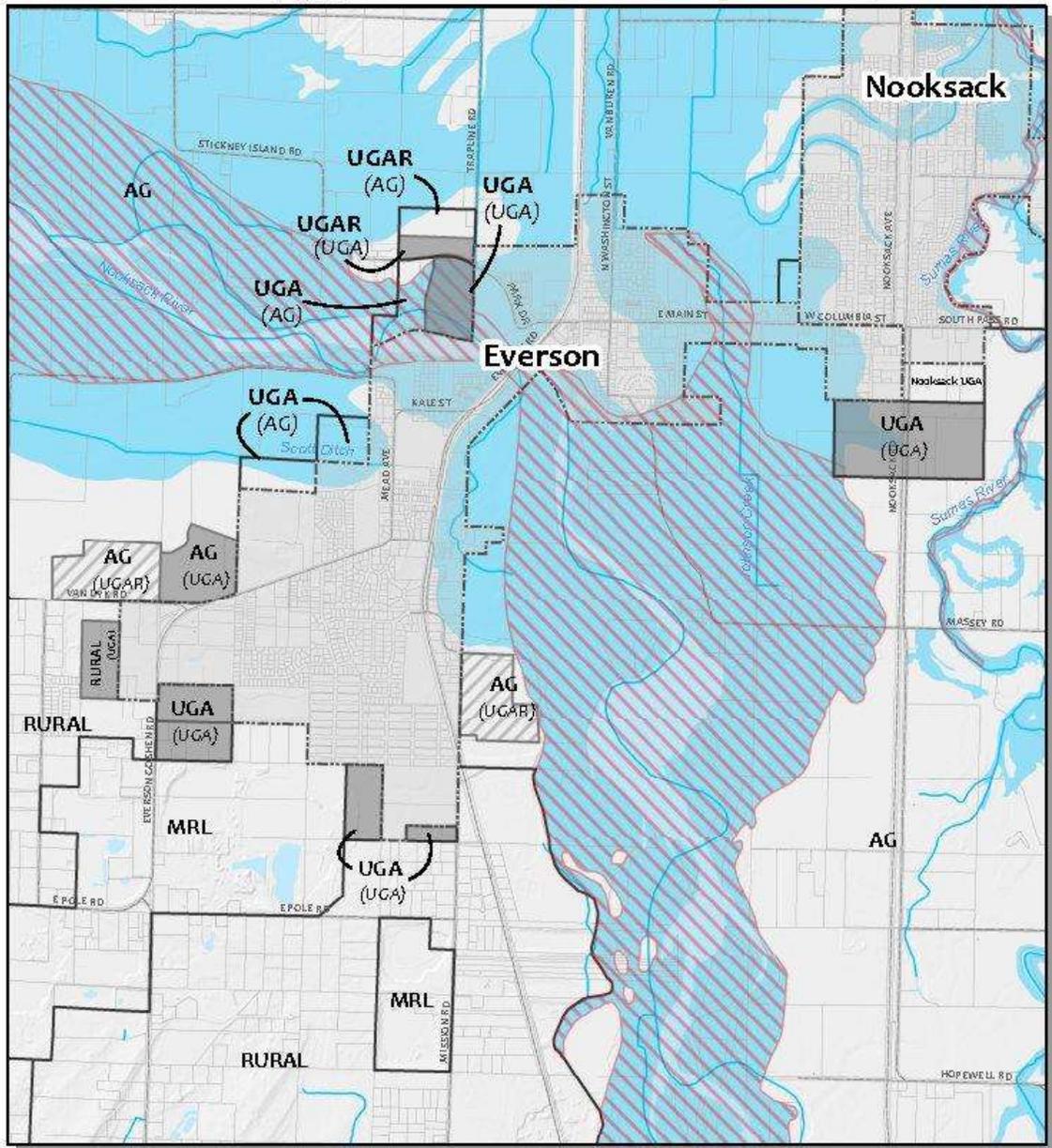
The reason this area is included in the UGA proposal is due to the location. It is located on the southeast corner of the property, which abuts city limits on

three sides. Exclusion of this area would result in a "hole" in city limits. Therefore, the city must include this portion to ensure access to the intersection of Stickney Island Rd and Trapline Rd and to prevent holes within city limits.

It is the City's belief that this property does not contain any flood risks. This conclusion is based off of hydraulic modeling prepared by WEST Consultants, at the City's request. Seen on Figure 4, a 100-year flood event would not cause any water to cross Stickney-Island Rd. This ensures that there is no risk of flooding or any creation of an "island" that emergency services would be unable to reach in a flood event.

However, to prevent any development from occurring, the city has begun to draft a restrictive covenant that would restrict all development within this area of the property. This covenant would be signed by the property owner prior to UGA expansion.

Figure 2. Former Proposed UGA/UGAR Effective Flood Map



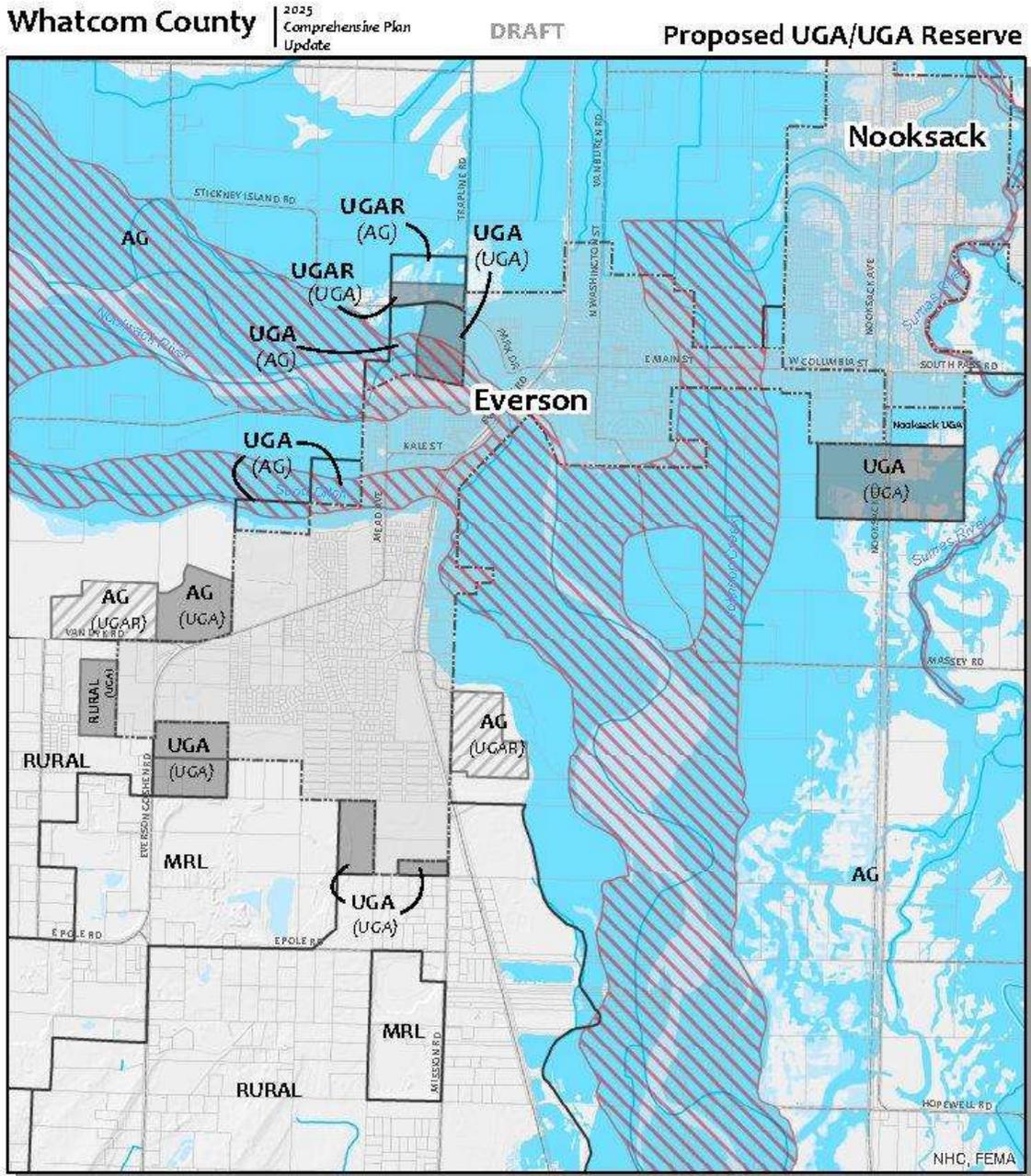
- Everson Urban Growth Area

- City of Everson
 - Proposed Urban Growth Area
 - Proposed Urban Growth Area Reserve
 - Comprehensive Plan Designations (Proposed in *italics*, Current in **bold**)
 - Effective Floodway
 - Effective Flood Zone
- Net change in AG designation - 45 ac. to UGA/UGAR

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Figure 3. Former Proposed UGA/UGAR Draft Flood Map



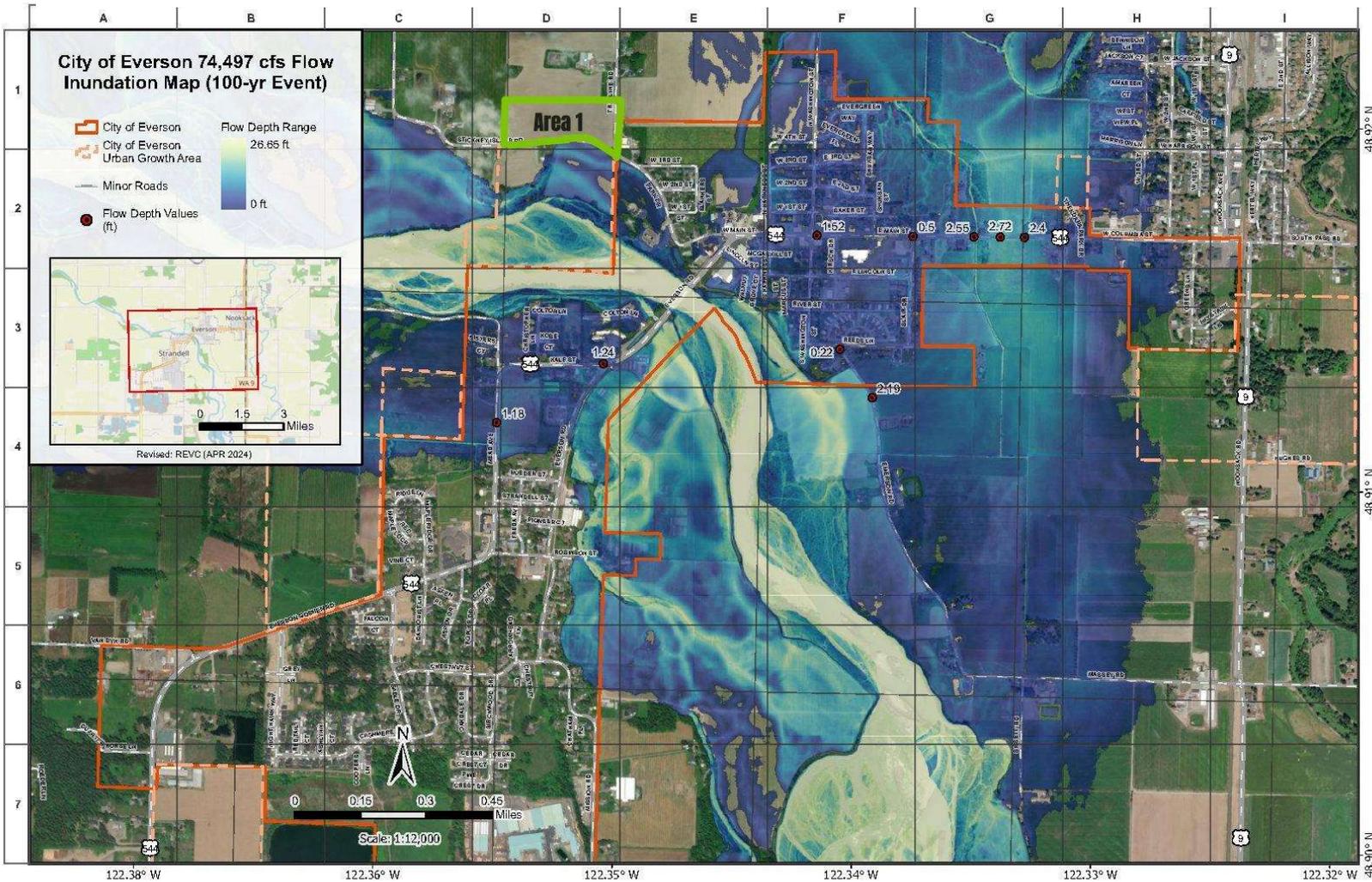
- Everson Urban Growth Area

- City of Everson
 - Proposed Urban Growth Area
 - Proposed Urban Growth Area Reserve
 - Comprehensive Plan Designations (Proposed in *()*, Current in **bold**)
 - Draft Floodway (2024-2025)
 - Draft SFHA (2024-2025)
 - Nooksack 1p75 x 100 Year Flood
- Net change in AG designation - 45 ac. to UGA/UGAR

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0 0.125 0.25 0.5 Miles

Figure 4. Flow Inundation Map for 100-Year Flood Event (WEST Consultants, 2024)



Agricultural Mitigation

As stated in the City’s UGA proposal summary, the City is proposing to add 34.14 acres of agricultural land into the UGA. This is area 2, as shown on Figure 1. The city is proposing to remove 65.6 acres of agricultural land from the current UGA and UGA Reserve (shown as areas 1 (portion), 4-6 on Figure 1). This would mean the County would be gaining 31.5 acres of agricultural land. The City is almost completely surrounded by agricultural and mineral resource lands. As the City moves west, outside of the floodplain, expanding into agriculturally zoned land is the most logical option.

The City understands and supports the County’s goal of maintaining agricultural land. The net gain of 31.5 acres of agriculture into the county

results in a loss of UGA AG land for the city. Therefore, no further agricultural mitigation is deemed necessary.

Whatcom County Policy 8A-6

Whatcom County Comprehensive Plan Policy 8A-6 states the following:

Require all requests for re-designation from agriculture to demonstrate that changed site conditions or circumstances have occurred since the original designation to such an extent that the site no longer satisfies the designation criteria for agricultural lands

The City's UGA proposal identifies one area that would expand into County designated agricultural land. This area has historically been zoned agricultural for many decades. As the city continues to move west, outside of the floodplain, this area now directly abuts city limits and city services. This raises the question of how appropriate agricultural designations are for this area as conditions change in and around them.

Area 2, which is being proposed to be added to the UGA, abuts city limits on the south and eastern sides of the property. This property now functions as single family residence with a hobby farm. The surrounding area are predominately residential and commercial operations.

It is also important to note the increasing development that is occurring around this property. Recently, the city approved a 98-lot subdivision that directly abuts to east of this property. There is also a proposed 100-lot subdivision that will occur directly south of this property. The City has already begun to plan for the construction of a sewer lift station to serve these subdivisions as well as the future development of this property.

This property is also located along SR 544, which is a major route for freight and travel. As the City has grown and moved westward, the agricultural designation of this area is not appropriate for the functions within and surrounding the property.

V. Conclusion

The City of Everson is proposing UGA expansion to address current capacity deficits and increased opportunities for affordable housing in response to demonstrated housing demand. The City's proposal aims to add areas that are outside of the 100-year floodplain and are adjacent to city services and urbanized areas. In this UGA Proposal Addendum, the City has provided information that supplements the information included in the City's initial

UGA proposal. Additional information has been provided in response to the concerns raised by Whatcom County Planning and Development Services. The City will continue to work with the County to provide all of the information needed to support the City's UGA Proposal.