

Urban Growth Area Review

City of Sumas UGA/UGA Reserve Proposal

September 2, 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.

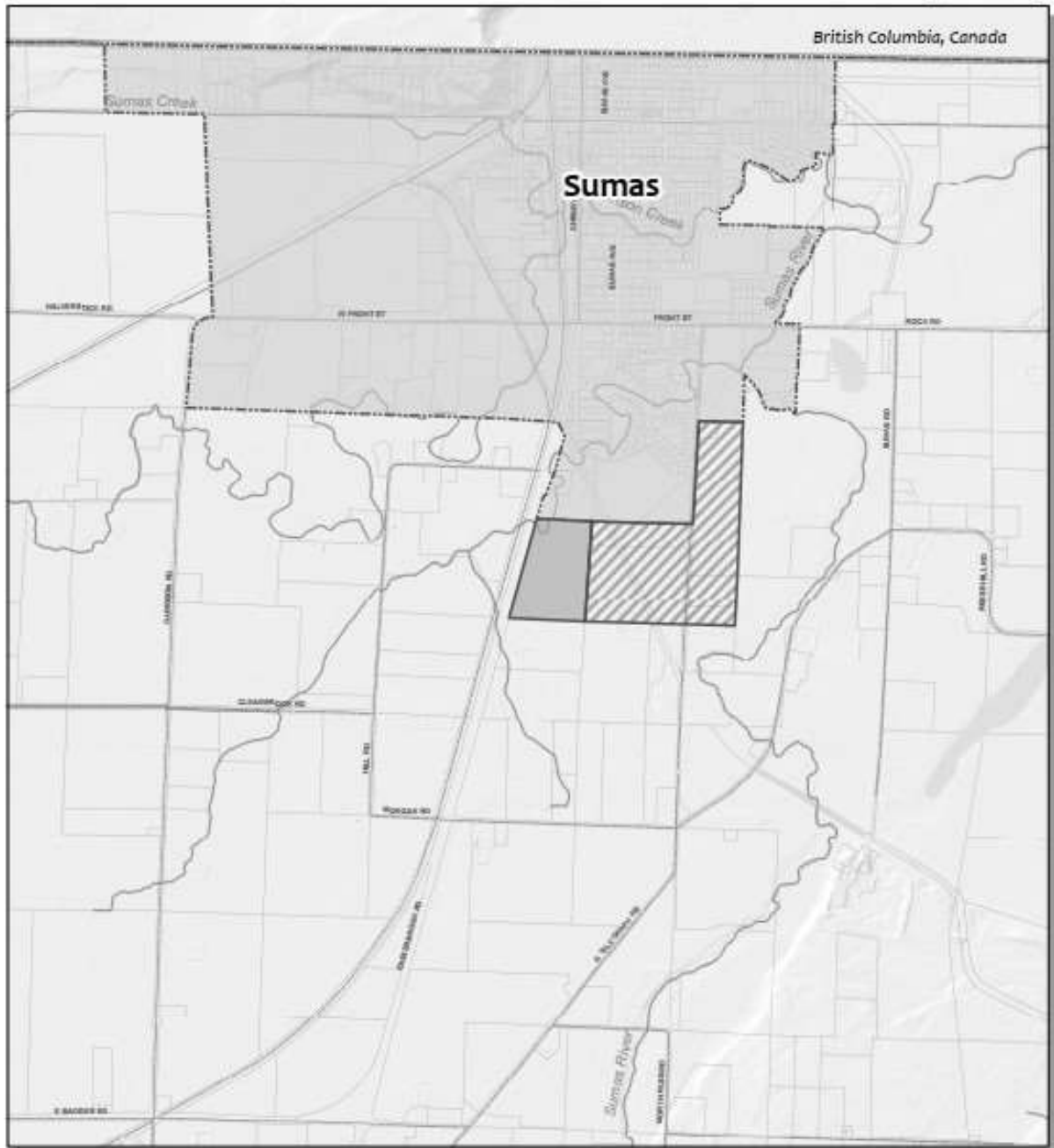
Existing interlocal agreements indicate that the County and cities will work together to develop proposed population and employment allocations to UGAs and review UGA boundaries. The County and cities are recommending UGA boundary proposals for their respective UGAs. Review of these proposals includes 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 Sumas is a small town located along the US-Canada border adjacent to the Sumas-Abbotsford, B.C. border crossing. As of April 1, 2023, the City had a population of 1,810. The current City limits includes an area of approximately 920 acres.

Early in its history, the town was an important economic center serving those looking for gold in the Fraser River Valley. Sumas is situated at the crossroads of two state highways, SR 9 and SR 547. Highway 9 runs north and south through the center of town and is a major route used by automobile and truck traffic traveling through the border. SR 547 connects to the Mt. Baker Highway (SR 542), which provides access to the recreational opportunities located in the eastern part of the county.

Paralleling SR 9, BNSF railway line also runs north and south through town. To the west of this transportation corridor lies the Sumas industrial area, and to the east are established residential neighborhoods. The majority of the undeveloped residential land in Sumas lies in the eastern portion of town near the Sumas River. Since the 1990s, the City has been encouraging new businesses to locate in the Sumas industrial area, and the City plans to continue working to attract new industrial and manufacturing businesses that can take advantage of the City's location near the Canadian border and low utility rates.



- Sumas Urban Growth Area

-  City of Sumas
-  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
RH	Residential – High Density	Single-family and multifamily residential zone. Minimum lot size of 6,000 square feet, which equates to a maximum of 7.26 single-family units per acre. No maximum permitted density for multifamily development. Maximum achieved densities for multifamily development exceed 20 units per acre.
RM	Residential – Medium Density	Minimum lot size of 7,200 square feet, which equates to a maximum of 6.05 units per acre.

<i>Table 2. Permitted Densities in the UGA (outside the City)</i>		
Zoning Abbreviation	Zoning	Permitted Densities
AG	Agriculture	1 dwelling/40 acres

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.

Sumas 2025 Proposal: The City’s population and employment growth allocation 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	1,000
2	City Growth Allocation Proposal	1,000
3	Difference	0

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

Table 4. UGA Housing Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	643
2	City Growth Allocation Proposal	630
3	Difference	13

Table 5. UGA Employment Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	500
2	City Growth Allocation Proposal	500
3	Difference	0

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

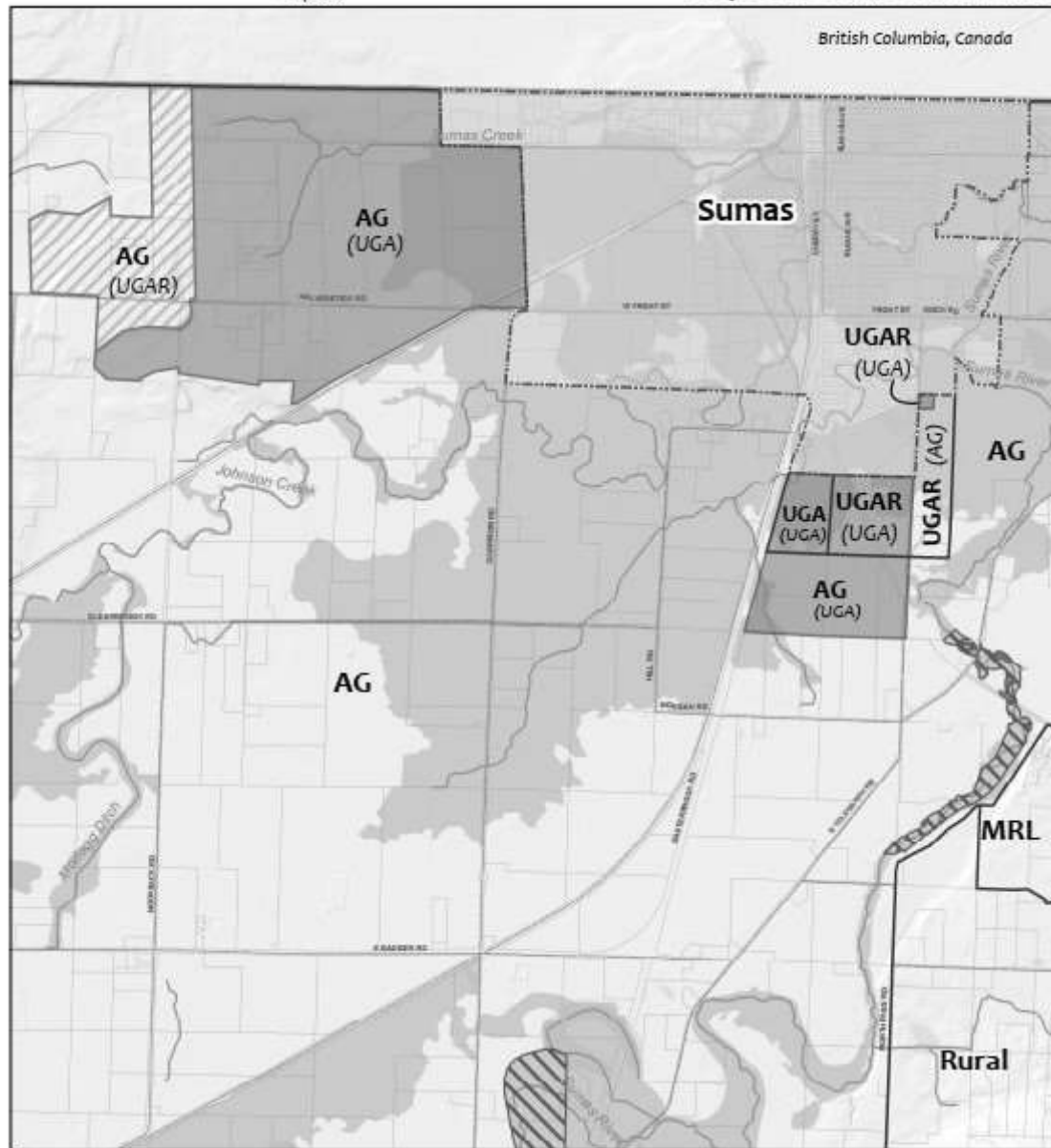
V. UGA / UGA Reserve Boundary Proposal

The City of Sumas is proposing expansions to the current UGA and UGA Reserve in two different directions, to the south and to the west. The maps below provide visualizations of those proposed expansion areas compared against FEMA’s current flood maps, as well as their proposed draft maps to be adopted in the coming years.

South. The City of Sumas’ current UGA and UGA Reserve exist directly south of the new ball fields. The current UGA is located directly Highway 9 and would serve as an important expansion to the City’s traffic-oriented commercial zoning district. For this reason, the City is proposing to preserve this UGA. The City’s UGA Reserve is located directly east of the current UGA and is located on either side of Hovel Road.

Both the current UGA and UGA Reserve are owned by a local dairy farmer whose main facility is located within the UGA Reserve on the east side of Hovel Road. Acknowledging the benefits of preserving this dairy farming operation, the City of Sumas is proposing to remove all UGA Reserve located on the east side of Hovel Road. However, there is a 1-acre parcel located in the very northwest corner of the UGA reserve which is owned by a local who has shown interest in being annexed into the City. For this parcel, the City is proposing to add it to the UGA. For the rest of the UGA Reserve located on the west side of Hovel Road, the City of Sumas is proposing to add this area to the UGA. This area's proximity to other residential areas on the south side of town, as well as the Howard Bowen park complex make it a perfect area for new residential development.

West. The Western portion of Sumas' UGA Boundary Expansion Proposal is a direct response to the flooding issue which has dominated discussions regarding future growth. The City of Sumas has proposed a large area where we believe Sumas' population growth will be safest from flooding. This area is higher in elevation than the rest of town and would be completely safe from flooding. Although located mostly within the floodplain, the area immediately west of City Limits is included within the proposal solely to keep the UGA expansion areas contiguous with Sumas City Limits.



- Sumas Urban Growth Area

- City of Sumas
 - Proposed Urban Growth Area
 - Proposed Urban Growth Area Reserve
 - Effective Floodway
 - Effective Flood Zone
 - Comprehensive Plan Designations (Proposed in (), Current in **bold**)
- Net change in AG designation - 702 ac. to UGA/UGAR

Map of Sumas Urban Growth Area and Effective Floodway and Effective Flood Zone

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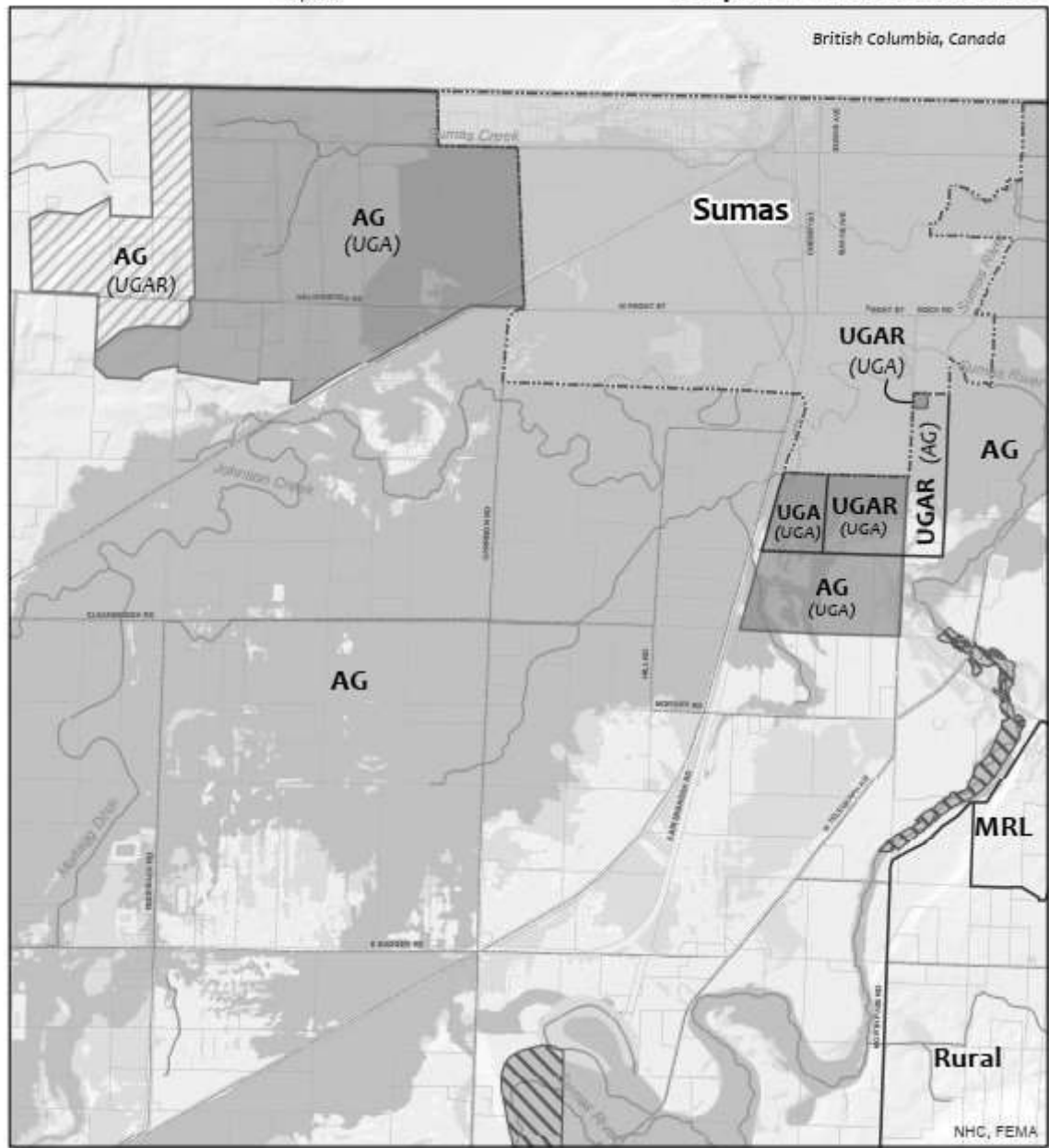
Map of Sumas Urban Growth Area and Effective Floodway and Effective Flood Zone

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Map of Sumas Urban Growth Area and Effective Floodway and Effective Flood Zone



2025



- Sumas Urban Growth Area

- City of Sumas
- Draft Floodway (2024-2025)
- Proposed Urban Growth Area
- Draft SFHA (2024-2025)
- Proposed Urban Growth Area Reserve
- Nookack 1p75x 100 Year Flood
- Comprehensive Plan Designations (Proposed in **()**, Current in **bold**)
- Net change in AG designation - 702 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 6. Proposed UGA - Population Land Capacity Analysis Results		
1	Population Growth Capacity of Proposed UGA	1,432
2	Population Growth Allocation Proposed	1,000
3	Surplus (Deficit)	432

Table 7. Proposed UGA – Housing Land Capacity Analysis Results

Income Band (AMI)	Aggregated Housing Needs	Total Capacity of Proposed UGA	Surplus (Deficit)
0-80%	427	215	(212)
80-120%	61	410	349
120+%	124	5	(119)
Total	612	630	18

NOTE: AMI means "Area Median Income"

With the additional land capacity provided by the proposed UGA expansions, Sumas would have enough land capacity to accommodate the projected population with some extra capacity for more population growth going into the 40-year planning period.

Table 8. Proposed UGA - Commercial/Industrial Land Capacity Analysis Results		
1	Employment Growth Capacity of Proposed UGA	550
2	Employment Growth Allocation Proposed	500
3	Surplus (Deficit)	50

With the additional land capacity provided by the proposed UGA expansions, Sumas would have enough employment growth capacity to accommodate the projected employment growth with some capacity left over for additional growth.

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 partnering with Cascade Engineering Group to update our *Water System Comprehensive Plan* that was approved by the Washington Department of Health in 2012. We expect that approval from the Washington Department of Health will approve this new update sometime in early 2026. Preliminary analysis indicates that the City has sufficient water rights to supply planned growth through 2045.

Sewer – The City transmits wastewater to the City of Abbotsford, B.C. under a wastewater disposal contract. The City of Abbotsford has begun preparations to update their sewer capital facilities plans. The City of Sumas will partner with Abbotsford in their effort. Their capital facilities update will not be completed in time for our Comprehensive Plan update timeframe, but we expect that it will be done prior to any expansion of our UGA.

Stormwater – Capital facilities related to stormwater are addressed in the Capital Facilities Element of the City's Comprehensive Plan, which will be reviewed and updated as part of the City's 2025 update process.

Fire Protection – Whatcom County Fire District 14 provides fire protection and emergency medical services to the City of Sumas and its UGA. The current version of the *Whatcom County Fire District No. 14 Capital Facilities Plan* was adopted by the District Commissioners in 2012. The City is currently partnering with the District to work on an update to this plan.

Schools – The Nooksack Valley School District provides educational facilities to the Cities of Sumas, Everson, and Nooksack, as well as the surrounding rural areas. The School District adopted an update to its Capital Facilities Plan in March, 2025.

Transportation – Capital Facilities related to the City's transportation system are addressed in the Transportation Element of the City's comprehensive plan, which will be reviewed and updated as part of the City's 2025 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: The City of Sumas' analysis of the land capacity of the current UGA boundaries shows a significant deficit in capacity for the projected population growth. The current conditions Land Capacity Analysis shows an overall deficit in population growth capacity of roughly 758 people.

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 with our partners to update the necessary capital facilities plans to show service capacity. Any attempts to annex the land into City Limits will not occur until the City is shown as having the capital facilities necessary to service the areas.

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: As UGA Reserve areas transition to UGA, Sumas will ensure that the City's established urban densities will be maintained pursuant to the GMA.

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: The City will take steps to ensure that adequate measures are taken to protect surrounding agricultural lands, subject to the conditions of the project.

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

City Comments: The City will continue to enforce land use regulations which protect the environment and sensitive watersheds around any new development. These regulations include: Critical Areas Ordinance, Shoreline Management Program, Floodplain Management Ordinance, etc.

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: The City of Sumas will continue to require considerations for open space and recreation for all new developments.

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

Sumas Urban Area

Growth of Sumas is constrained by agricultural lands. Lands in agricultural use on the south end of Sumas along Hovel Road have been designated as an Urban Growth Area Reserve. While there is sufficient land within the city to accommodate projected growth, there is little surplus, and growth outward may become necessary. This area will be kept in reserve status until the County has determined that development will not expose future residents and employees to unacceptable risk from naturally occurring asbestos. The Urban Growth Area Reserve should be jointly planned with the city and county in conjunction with Urban Growth Area plans.

City Comments: Evidence of naturally occurring exposure to asbestos in the UGA Reserve is directly due to the presence of asbestos at the site of the Swift Creek landslide. Swift Creek is a tributary of the Sumas River which flows north, nearby to Sumas' UGA Reserve area. Since the designation of this area to UGA Reserve, ongoing mitigation efforts by Whatcom County have significantly reduced the risk of exposure to asbestos for Sumas' residents. The City is confident in the mitigation work being performed by the County and that actual risk of asbestos exposure is very minimal.

The City of Sumas no longer agrees with the statement that there is sufficient land to accommodate projected growth. Our current conditions land capacity analysis shows that Sumas does not have sufficient land to accommodate even the low projection provided SCJ Alliance in their technical report. Sumas is in desperate need of expanded UGA areas in order to facilitate any future growth of the community.

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).

Subsection 36.70A.110(10)(a) RCW specifically restricts any development which encroaches into a 1% annual chance floodplain which is both west of the Cascade Mountain Range and has a mean annual flow of at least 1,000 cubic feet per second (cfs). Strictly following this provision would not allow Sumas to expand into Nooksack River floodplain. However, the following subsection, 36.70A.110(10)(b) RCW, provides criteria for possible exceptions to the restriction. The City is focusing on subsection 36.70A.110(10)(b)(iii)(C) allows an exception to the restriction if the proposed UGA expansion area within the floodplain is either owned by the jurisdiction or has had its development rights permanently extinguished. Since the

land within the floodplain is already used for agricultural purposes, the City would be requiring that the areas retain their agricultural use, falling under the City's zoning of Open Space/Agriculture.

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 proposal is to expand the UGA and UGA Reserve in Agriculture Lands.

If expanding UGA into areas designated as Agriculture, Rural Forestry, Commercial Forestry, or Mineral Resource Lands, address the policies in Whatcom County Comprehensive Plan Chapter 8.

The City of Sumas appreciates Whatcom County's efforts to preserve and protect 100,000 acres of agricultural land. However, the unfortunate reality is that Sumas needs to expand its UGA in order to accommodate future projected growth and all of the land around Sumas is designed agriculture. This causes a conflict of interest in the City and forces us to encroach into an area that we would otherwise be happy to preserve.

In recognition of the effort to preserve 100,000 acres of agriculture land, the City of Sumas is offering to work with Whatcom County to create a Purchase of Development Rights program. Through this program, prospective developers looking to purchase any of the UGA expansion land would need to pay a certain amount per acre into the Whatcom Conservation Futures Fund. This way, while agriculture land will be lost to development near Sumas, those same developers are also helping to pay the County to help protect the development rights of agricultural lands elsewhere in the Whatcom County.

XI. Conclusions

The City of Sumas is currently in an unfortunate situation in which a lack of land capacity to accommodate future population growth is forcing the City to propose expansion of our UGA into lands designated agriculture and located within the Nooksack River floodplain. This expansion proposal is not perfect, but a lack of space and flooding issues are forcing us in the current direction. The City is willing to work with Whatcom County and the State of Washington to take any steps necessary to see this proposal come to fruition, within reason. Any help in that Whatcom County can provide in this pursuit is greatly appreciated.