

Urban Growth Area Review

City of Blaine UGA Proposal

November 18, 2025
(updated)

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 haven 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 of Blaine UGA Profile

Blaine is a picturesque seaside community with a bustling downtown, a strong industrial sector, and diverse neighborhoods. The City of Blaine was born in

industry; prominent for its fishing fleets, canneries and mills. Blaine has a diverse economy that capitalizes on its border location but is not dependent upon it.

The City of Blaine UGA currently includes approximately 4,065 acres, not including undevelopable tidelands within the incorporated city limits. Approximately 3,565 acres are currently within the City Limits. The City of Blaine UGA was designated by Whatcom County in 1997 in the first comprehensive plan adopted under the Growth Management Act.

The Blaine UGA has an estimated 2023 population of 6,728. Blaine's population increased by 1,451 between 2013 and 2023, constituting 4.9% of Whatcom County's population growth.

The City of Blaine can be viewed as three smaller planning areas: Central Blaine, West Blaine, and East Blaine.

Central Blaine includes the original town site that was incorporated in 1891. A small portion of land near Dakota Creek at the southern end of Blaine was annexed in the 1940s. Additional small areas of Central Blaine were annexed in the 1970's - 1990's including slivers of land between Blaine and the Canadian Border west of State Route 543, and also near Dakota Creek. In 2009, Whatcom County removed over 2,000 acres of environmentally sensitive lands surrounding Drayton Harbor from the Blaine UGA as part of the periodic comprehensive plan update.

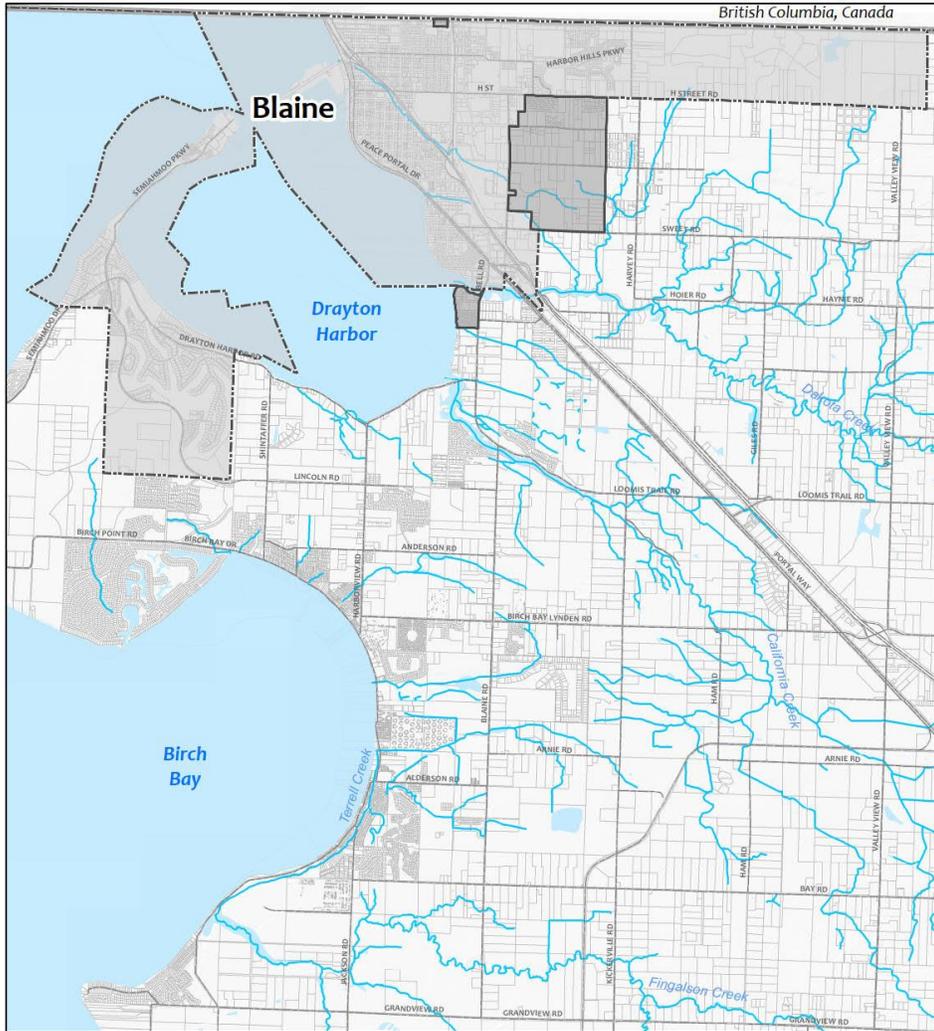
West Blaine lies across Drayton Harbor from Central. Much of West Blaine was annexed to the City as the Resort Semiahmoo site in 1974, with an additional ~160 acres annexed into the city in the 1990s. Some of the West Blaine UGA was removed by Whatcom County in 2009.

East Blaine refers to the area east of Central Blaine, which was annexed in 1996. A large portion of the East Blaine area has been identified as an aquifer recharge area. This aquifer is tapped to provide the public water supply for Blaine and Birch Bay.

The UGA boundaries were not changed in the last periodic Comprehensive Plan Update in 2016.

Approximate acreages of currently zoned Blaine UGA, inclusive of the city limits are summarized by land use type below:

- Residentially Zoned Parcels 2,402 Acres
- Commercially Zoned Parcels 190 Acres
- Industrially Zoned Parcels 357 Acres
- Publicly Zoned Parcels 136 Acres
- UGA Total Zoned Parcels 3,805 Acres



- Blaine Urban Growth Area

-  City of Blaine
-  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.

Table 1. Permitted Densities in the City		
Zoning Abbreviation	Zoning	Permitted Densities
GW	Gateway	One dwelling unit as an accessory to an approved use.
Ma	Manufacturing -A	Caretaker or security residences as accessory to an approved use.
Mb	Manufacturing -B	Live-Work units – each less than 1,500 sq. ft or one-third floor area.
Mc	Manufacturing -C	Live-Work units - each less than 1,500 sq. ft or one-third floor area.
MPR	Marine Planned Residential	Attached residential – 40% - 90% lot coverage, no density cap.
CB-G-36	Central Business – Garden 36	SFR and MFR – no minimum lot size, no density cap.
CB-G-48	Central Business – Garden 48	SFR and MFR – no minimum lot size, no density cap.
CB-M-48	Central Business – Market 48	MFR – no minimum lot size, no density cap.
CB-M-60	Central Business – Market 60	MFR only – no minimum lot size, no density cap.
CB-TP-60	Central Business –Town Portal 48	MFR only – no minimum lot size, no density cap.
CB-WV-36	Central Business- Waterview 36	MFR only – no minimum lot size, no density cap.
CB-W	Wharf	Mixed use residential with ground floor commercial - covers 20% of zone (Mariner’s Village), no density cap. Also boat liveaboards.
HCa	Highway Commercial - A	Dwelling units as an accessory to an approved use; convalescent homes; high density residential up to 24 units/acre
HCb	Highway Commercial - B	No allowed residential types
HCc	Highway Commercial - C	assisted living facility, nursing and convalescent homes

HCd	Highway Commercial - D	Residential development (e.g., attached, stacked, or detached dwelling units) up to 24 units per acre; nursing and convalescent homes
R/O	Residential / Office	Single-family dwellings; Townhouses and attached single-family dwellings; Duplex, triplex and fourplex units; Multifamily dwellings; Adult family care facilities and nursing homes Max density 24 units/acre
RH	Residential High Density	SFR and MFR up to 24 units/acre, 6,000 sf minimum lot size
RM	Residential Medium Density	SFR and MFR up to sixplexes- max density 11 units/acre (one fiveplex and one sixplex; Elderly housing or Nursing Homes
SF-2	Single-Family Two	SFR with accessory apartments (6,000 sf lots), attached single-family on two lots (3750 sf each x 2), nursing homes. Max SFR density 7 units/acre.
SF-1	Single-Family One	SFR with accessory apartments (6,000 sf lots), in-home care facility, nursing homes. Max SFR density 7 units/acre
RL	Residential Low	SFR, in-home care facility (7,200 sf lots). Max SFR density 6 units/acre
RPR	Residential Planned Recreation	SFR, attached SFR and MFR; adult family care; Average density up to 3 units per net acre
PR	Planned Residential	SFR, attached SFR and MFR; manufactured home parks; adult family care; retirement, boarding and convalescent homes; one dwelling per five acres without utility services, average density up to 4 units per gross acre when serviced
UMU	Urban Mixed Use	Attached SFR, townhomes, MFR; max density 24 units/acre
PC	Planned Commercial	MFR up to 18 units per acre (First unit at 6,000 each, additional at 2,200 square feet); RV parks
PUB	Public	No allowed residential types

Table 2. Permitted Densities in the UGA (outside the City)

Zoning Abbreviation	Zoning	Permitted Densities
R5A	Rural	1 dwelling/5 acres
UR4 Y	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

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.

The proposed growth allocations for the City of Blaine UGA over the planning period are for an additional 3,500 people, 1,774 housing units, and 1,092 jobs. These allocations are consistent with the multi-jurisdictional resolution approved by the County Council in March 2025 and the Blaine City Council in April 2025.

The City of Blaine is well-positioned to accommodate future population and employment growth. Blaine has invested substantially in infrastructure based on plans to serve our growing community. Municipal water and wastewater service areas continue to expand to support the development of East Blaine, which includes several new subdivisions currently under construction, with plans for hundreds of new housing starts.

The City of Blaine UGA has experienced the second-highest average annual growth rate percentage of all the cities¹ in Whatcom County at 2.5%, second only to Ferndale’s 2.6-percent (Lynden is close at 2.4%). From 2013 to 2023, Blaine grew by 1,451 people, or a 4.9 percent share of ten years of growth in Whatcom County. Blaine’s UGA population in 2023 is estimated at 6,728.

¹ Cherry Point has a higher growth rate but is not factored into this statement as an unincorporated UGA.

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

The City of Blaine’s proposal is consistent with the allocation by Whatcom County approved by the County Council under the multi-jurisdictional resolution. The Technical Report middle population growth scenario for Blaine is 2,774. The City plans to achieve this medium-high population growth of 3,500 over the next 20 years through infill development. The City has already taken the first few actions, including increasing maximum building height in the Central Business Waterview District, adopting a residential parking relief program for the entire Central Business District, and creating a new Urban Mixed Use zoning to accommodate middle housing.

Table 4. UGA Housing Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	1,774
2	City Growth Allocation Proposal	1,774
3	Difference	0

The City’s housing growth proposal is based on the Washington State Department of Commerce’s Housing for All Planning Tool.

Table 5. UGA Employment Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	1,092
2	City Growth Allocation Proposal	1,092
3	Difference	0

The presence of the international border plays a large role in Blaine's vision of the future. Blaine seeks to continue to capitalize on cross-border trade and visitors as the city grows. Collaboration with Whatcom County and the Port of Bellingham Regional Economic Partnership will be key to accomplishing our goals and aspirations as a leader in economic development.

The City’s 2016 comprehensive plan speaks to expanding the city limits to accommodate more manufacturing growth, but action has not yet been taken.

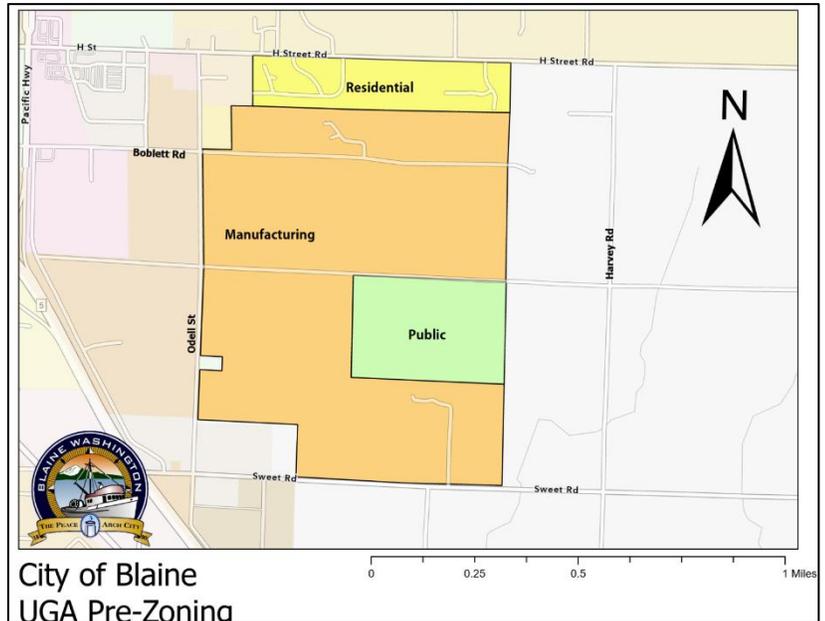
The City of Blaine’s proposal is consistent with the allocation approved by Whatcom County under the multi-jurisdictional resolution. The Technical Report middle employment growth scenario for Blaine is 701. The City plans to achieve a high employment growth rate over the next 20 years by redesignating land in the unincorporated UGA from residential to manufacturing, and reforming the City’s

manufacturing zoning regulations. Under the City’s proposal, 263 acres of land would be redesignated or added to the manufacturing land supply once annexed into the city. This includes:

- Redesignating 26 acres in the unincorporated UGA from Res 6-20 to Manufacturing.
- Redesignating 237 acres in the unincorporated UGA from Res 4-6 to Manufacturing.

A primary goal of the City’s 2025 comprehensive plan update is to concentrate manufacturing growth near the existing industrial area and adjacent to Odell Road and Boblett Street. This would allow development to take advantage of several of the most significant municipal transportation projects in the City’s history. These include:

1. The Odell Road project, completed in 2000, which created the primary north/south truck and freight corridor. The road was built to heavy-haul (freight) standards similar to those of Boblett Street. Odell Road is currently the eastern edge of the city limits, so only one side of the road is currently available for manufacturing development.
2. The City also completed the Boblett Channelization project in 2025, which improves truck and freight access from Odell Road to the Pacific Highway (State Route 543).



The city requests that Whatcom County rezone this area, approximately 263 acres, from UR4 to Light Impact Industrial (See City of Blaine UGA Pre-Zoning map on this page, area marked as Manufacturing). Light Impact Industrial will better align with the future intended uses of this area by the city.

This proposal would also advance many of the goals of Whatcom County’s Industrial Lands Study, a new report prepared for the Port of Bellingham in July 2025. These goals include creating more industrial land near Interstate 5, as well as lands within a quarter mile of designated truck routes and fully serviced mid to large-sized parcels.

V. UGA / UGA Reserve Boundary Proposal

The City of Blaine proposes a UGA reduction, and is not proposing a UGA swap, or expansion at this time. The city is also not proposing a UGA Reserve at this time.

The city proposes de-annexing a portion of East Blaine due to limited development potential and environmental factors. The de-annexation process is expected to be completed in approximately 60 days following a review by the Whatcom County Boundary Review Board and a final ordinance by the Blaine City Council.

The Blaine proposal includes the following:

- De-annex 573 acres of East Blaine and remove this area from the UGA;
- Remove 37 acres of UGA south of Dakota Creek (outside city limits);

East Blaine De-annexation and UGA removal - 573 acres

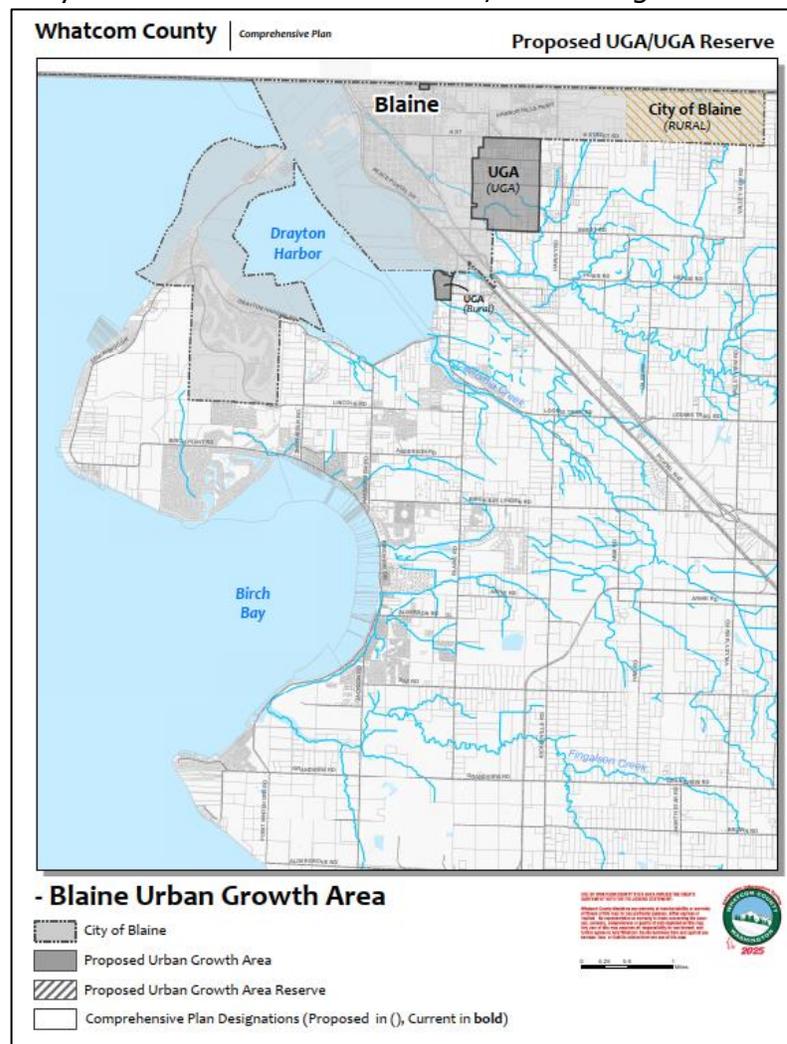
East Blaine was annexed into the city in 1996. The proposed de-annexation area, which is currently passing a super majority vote following the November 4, 2025 election, is generally east of Harvey Road and north of H Street, extending east of Valley View Road. The area contains several wetland complexes and sits above large areas of moderate and high aquifer recharge potential for the City of Blaine’s water utility. The area remains rural in character and has not been serviced with urban levels of infrastructure for almost 30 years.

According to a City of Blaine aerial photo and GIS analysis, the East Blaine De-annexation area has 18 homes over 573 acres of private land, or approximately 0.031 units per acre, which is a very low density at almost 32 acres per home.

The city supports Whatcom County zoning this area R10A, once it is removed from the city limits and UGA.

Dakota Creek UGA removal – 37 acres

This UGA isn’t suitable for additional development, contains a high concentration of critical areas, and includes climate impact areas such as sea level rise. This area is already developed with single-family residences, including the Harbor Shores



development, which is connected to the city’s sanitary sewer system. The remainder of the UGA is not on city sewer, and Birch Bay Water and Sewer District provides potable water. The UGA has substandard roads compared to city standards and is physically separated from the rest of Blaine by Dakota Creek.

According to a City of Blaine aerial photo and GIS analysis, the Dakota Creek UGA area has 68 homes over approximately 33 acres of private land, equating to 2.06 units per acre, which is a rural density.

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	4,904
2	Population Growth Allocation Proposed	3,500
3	Surplus (Deficit)	1,404

Waterfront communities remain highly desirable, and as telecommuting becomes a common practice, Blaine is an ideal place to live, work, and play. Blaine has taken steps to accommodate urban density in the core of our downtown and has recently passed parking relief and approved height increases in the Central Business District to accommodate infill housing.

Table 7. Proposed UGA – Housing Land Capacity Analysis Results

Income Band (AMI)	Aggregated Housing Needs	Total Capacity of Proposed UGA	Surplus (Deficit)
0-80%	1,184	1,208	16
80-120%	230	431	201
120+%	359	1,129	770
Total	1,773	2,760	987

NOTE: AMI means “Area Median Income”

Blaine has the capacity for significant infill development and remains committed to creating even more options for workforce housing, affordable housing, and low-income housing to support jobs in and around our community.

Table 8. Proposed UGA - Commercial/Industrial Land Capacity Analysis Results		
1	Employment Growth Capacity of Proposed UGA	1,237
2	Employment Growth Allocation Proposed	1,092
3	Surplus (Deficit)	145

The City of Blaine has prioritized economic development as one of its highest priorities. The city completed a Strategic Economic Initiative to develop an action plan for improving economic development prospects in Blaine. A number of actions have already been initiated that are designed to make the city more competitive and attractive. The most recent project is the city’s Downtown Revitalization project, which is currently near completion and makes improvements to five city blocks of the core of downtown.

The majority of Blaine’s industrial land, including the largest properties that are the most attractive to regional developers, remain vacant or off the market. Various reasons, such as environmental constraints and local market factors, have kept these properties from being developed and impeded Blaine’s ability to provide an adequate supply of industrial land that is available to the market. The Blaine UGA proposal capitalizes on land that is adjacent to our designed truck route with direct access to the Pacific Highway.

By changing the pre-zoning of the East Blaine UGA from residential low density to manufacturing, the city is targeting this portion of the UGA for industrial job growth. The residential growth previously planned for this area would be shifted to Central and West Blaine.

Blaine is also significantly impacted by the trucking and transportation industries. A trucking facility may have only one or two jobs but may occupy several acres of land. Blaine has a relatively high percentage of these businesses being located on Interstate 5 and the Canadian border. Planning for this important community issue requires allocating substantial acreage to this type of development, which is reflected here with the high employment request. Warehousing and freight logistics industries have similar needs for large land areas and similarly low employment density. It is critical to have a large land area available to make Blaine attractive to these economic drivers.

Blaine should coordinate with Whatcom County to ensure that our UGA is protected for future uses, as the city has planned.

VII. Capital Facility Planning

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

Water – The City of Blaine Water Comprehensive Plan was adopted by City Council on January 10, 2022, and approved by the Department of Health on December 15, 2021. The Plan was completed by CHS Engineers and is dated July 19, 2019.

Blaine’s water system is robust and reliable. It provides water across most of the UGA and is the sole provider for Birch Bay Water and Sewer District (BBWSD) and the Bell Bay Jackson Water Association.

The City’s active wells have historically maintained the current production capacities; therefore, they are deemed as reliable sources of supply by the Department of Health.

The city will continue to develop its water system and has a series of projects planned for the near future to ensure anticipated growth is adequately serviced.

These include new wells, new well field pump stations, pump station upgrades, major water main upgrades, and water circulation and reservoir improvements.

The city is updating its Water Comprehensive Plan in 2026, following its adoption of the Comprehensive Plan.

Sewer – The City of Blaine General Sewer Plan is dated September 2004 and was completed by CH2M Hill.

The General Sewer Plan anticipates residential service for large areas outside the current UGA as well as smaller commercial and industrial areas.

In 2010, Blaine completed the Lighthouse Point Water Reclamation Facility. This new state-of-the-art semi-automated water reclamation facility uses advanced membrane bio-reactors to reliably purify municipal wastewater to meet stringent Class A water reuse standards.

The Lighthouse Point Water Reclamation Facility (LPWRF), located along Marine Park, is a 23,000-square-foot complex that is a model in design architecture, complementing Marine Park and the city’s working waterfront. The facility was



designed to minimize noise, odor, and view obstructions at the park by housing most of the treatment systems underground.

The facility is the largest single municipal project in the City's history, and was designed to serve the UGA in place at the time, which included approximately 2,000 additional acres, before Whatcom County removed them from Blaine's UGA.

The City has initiated a comprehensive update to its general sewer plan, anticipated for completion in 2027.

Stormwater – The City's current stormwater plan is from 1995; however, the City has budgeted improvements to help manage growth, including regional detention and water quality enhancements, upgrades to Drayton Harbor and Semiahmoo facilities, and a new service truck.

The City has budgeted to update the stormwater plan, anticipated to be completed in 2026.

Fire Protection – North Whatcom Fire & Rescue provides fire protection and emergency medical services to the majority of the UGA. The *North Whatcom Fire & Rescue and Fire District # 4 Capital Facilities Plan* was approved by the District Commissioners in 2016. This Plan states:

The Fire District intends to request mitigation fees pursuant to RCW 82.02.020 (voluntary agreements) and/or RCW 43.21C.060 (SEPA mitigation) from developers to partially finance planned capital facilities needed to serve new growth. However, these mechanisms would not capture the incremental impacts to Fire/EMS services that smaller developments might cause over time. For example, they would not apply to construction of a new single-family residence on an existing lot. Whatcom County and the City of Blaine currently do not have fire impact fee ordinances that would allow collection of impact fees for both larger and smaller developments pursuant to RCW 82.02.050 -.100. The Fire Districts encourage the County and the City of Blaine to adopt fire impact fee ordinances. (p. 12).

The City of Blaine now collects fire mitigation fees consistent with the current Fire District Capital Facility Plan for all new construction, including single-family homes, per City Policy and the adopted Unified Fee Schedule.

Schools – The Blaine School District serves Blaine's UGA. The *Blaine School District Capital Facilities Plan* was approved by the District in 2024. The Plan shows that, between 2014 and 2024, the total population of the District increased by about 18%. However, during this same time frame, total student enrollment dropped by about 9% (pages 4 and 5). The District projects modest student enrollment growth through the end of the planning period (2045). The District's Capital Facilities Plan shows adequate classroom capacity to accommodate projected enrollment through 2045 (p. 10).

Transportation - Intersection improvements have already been identified as logical upgrades in the street network to serve Blaine's UGA. Major projects include

- Peace Portal (SR548) and Bell Road - BNSF Railway Grade Separation Project.
- Peace Portal/Bell Road Lane Improvements.

Additional intersection projects would be triggered if a development caused a localized impact/need. Projects over the 20-year planning period will, as appropriate, be set forth in the Blaine Comprehensive Plan and the six-year Transportation Improvement Plan.

Whatcom County's planned improvements to Lincoln Road, including completion of the connection between Harborview Road and Blaine Road (State Route 548), Would provide the Semiahmoo and north Birch Bay area improved access to Interstate 5.

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

The City of Blaine's preferred UGA alternative involves reducing the UGA to better position the city for future UGA realignment. The city encourages Whatcom County to zone the 573 acres that will be removed from the city limits and UGA to R10A.

The city requests Whatcom County rezone the portion of the current UGA pre-zoned by the city for Manufacturing, from UR4 to Light Impact Industrial. With the de-annexation and reduction of the UGA, together with the addition to the industrial lands supply, the city will be well-positioned to meet population and employment growth targets over the planning period (2023-2045).

In summary, the City of Blaine recommends a population growth projection of 3,500, a housing growth projection of 1,774, and an employment growth projection of 1,092 jobs for the proposed Blaine UGA over the new planning period. These projections are consistent with the non-binding multi-jurisdictional resolution regarding preliminary population, housing and employment allocations (County Council Resolution 2025-011). The Blaine UGA proposal would provide land zoned to accommodate the projected population, housing, and employment growth over the planning period. It would also accommodate housing for lower, moderate, and higher income levels.