

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.

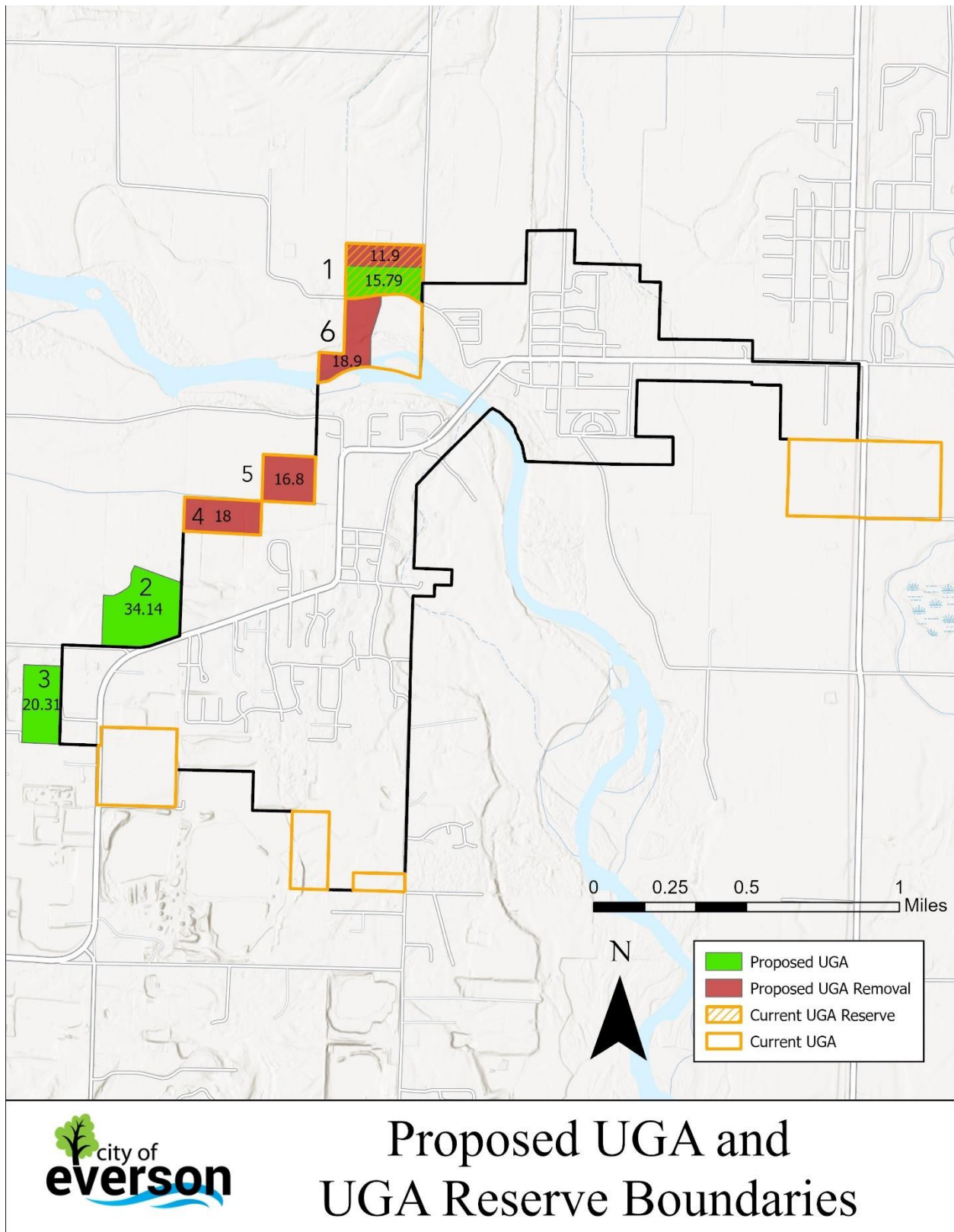
III. Proposal Breakdown

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



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.

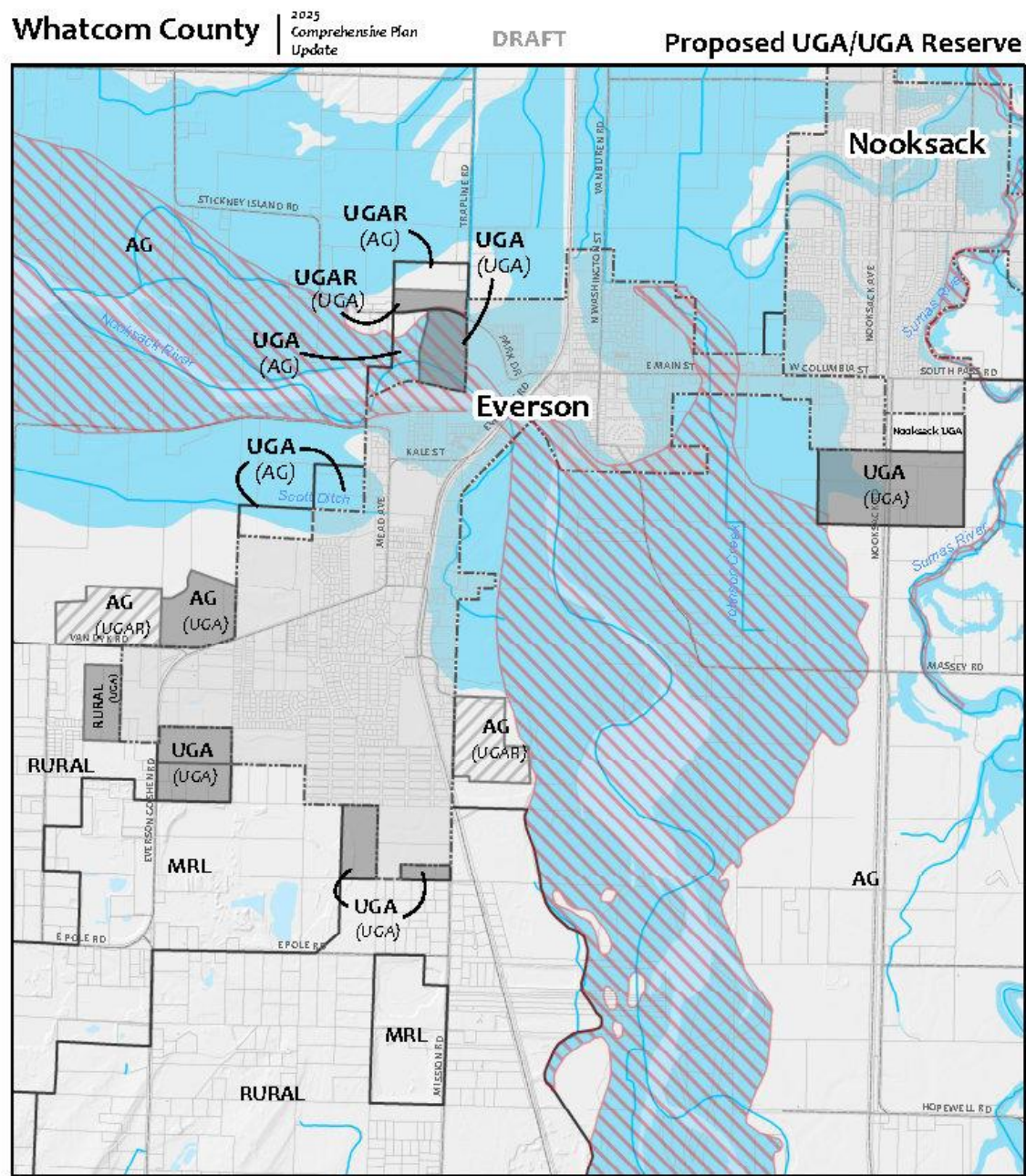
The reason this area is included in the UGA proposal is due to the location. It is located on the southeast corner of the property, which abuts city limits on

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

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Figure 3. Former Proposed UGA/UGAR Draft Flood Map

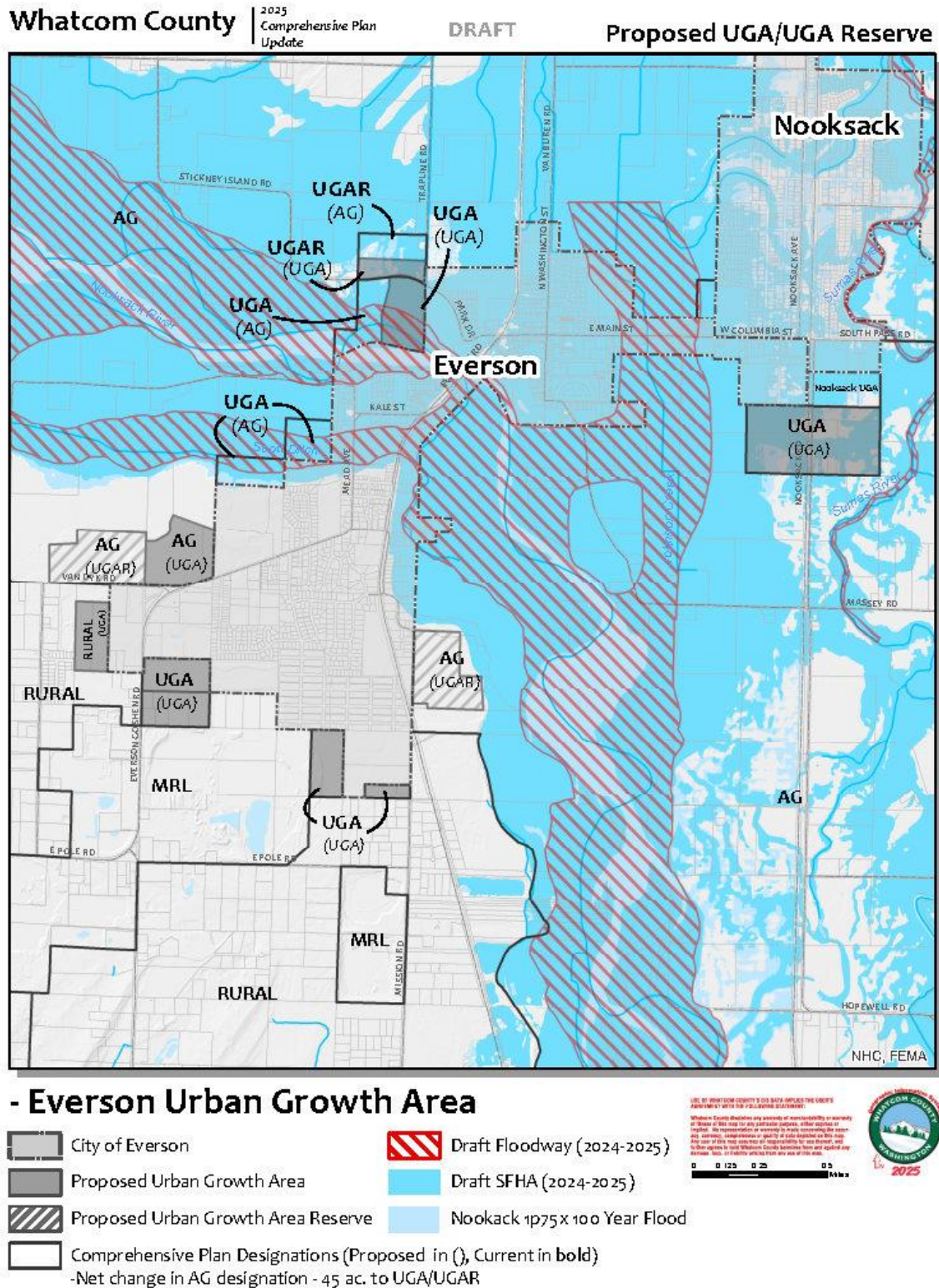
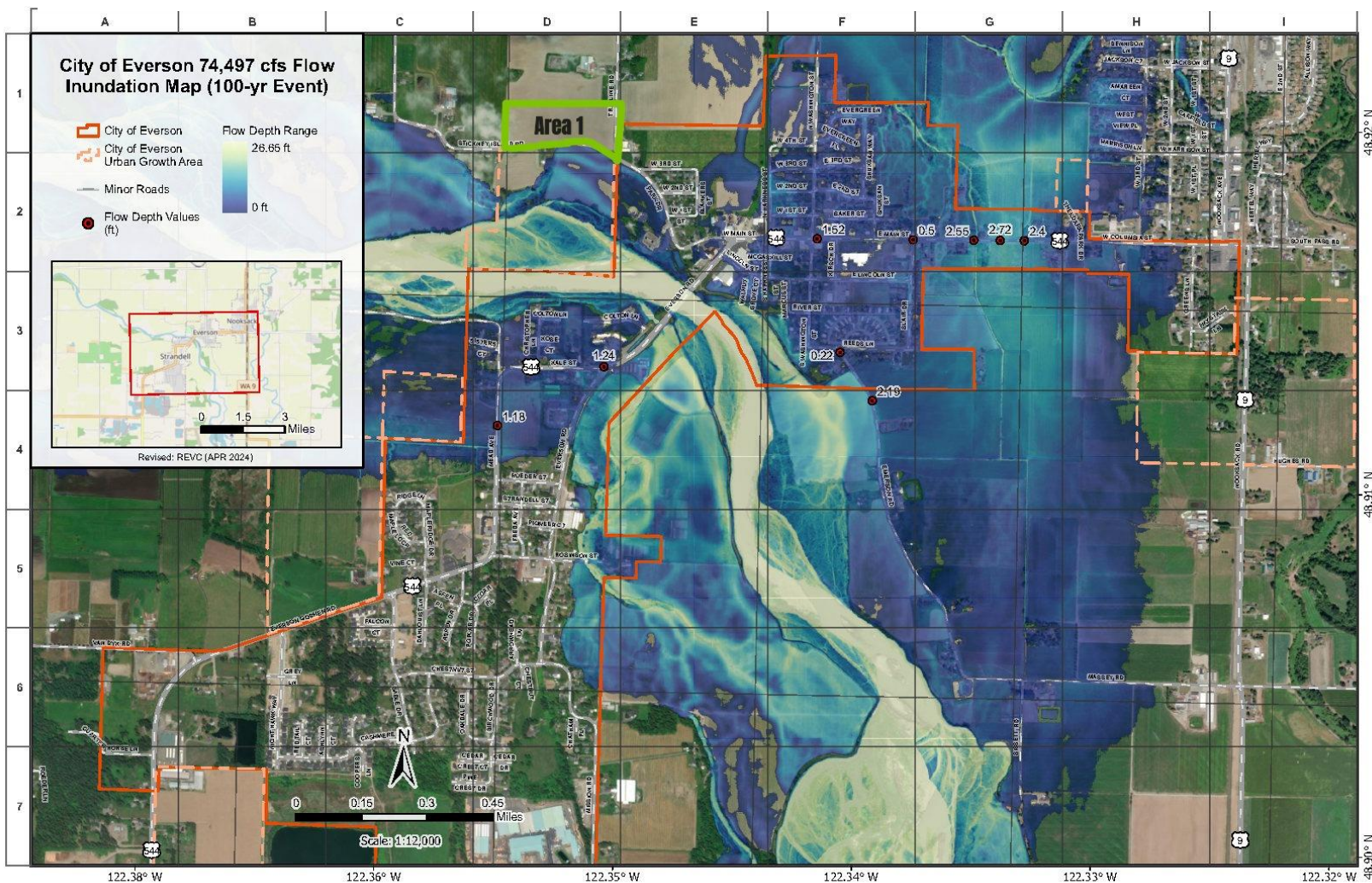


Figure 4. Flow Inundation Map for 100-Year Flood Event (WEST Consultants, 2024)



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.