

Urban Growth Area Review

City of Sumas UGA/UGA Reserve Proposal Second Addendum

February 4, 2026

I. Introduction

On August 29, 2025, the City of Sumas submitted its UGA and UGA Reserve Proposal (UGA Proposal) to Whatcom County as part of the 2025 review and update of the city and county comprehensive plans required under the state Growth Management Act (GMA), RCW 36.70A. See the attached map that shows the City's existing urban growth area (UGA) and UGA Reserve. See also the attached map that shows the Sumas UGA Proposal, including Areas 2, 3, 4, 6, 7, 8, and 9 that are proposed to be included in the Sumas UGA.

In an email message 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 the County's concerns and provided the City's preliminary responses to these concerns. The purpose of the first UGA Proposal Addendum, dated October 20, 2025, was to provide supplemental information to address these concerns to a sufficient degree to allow the City's UGA Proposal to move forward.

In subsequent messages from the County dated September 9 and October 1, 2025, County Planning provided additional requests that the City's UGA Proposal Addendum also address Whatcom County Comp Plan Chapter 2, page 2-18, and Policy 8A-6, related to setbacks and buffers from agricultural lands in the UGA Reserves and de-designation of agricultural lands and changed circumstances. In a response to these concerns and additional requests for information, the City of Sumas submitted an addendum to the UGA Proposal dated October 20, 2025.

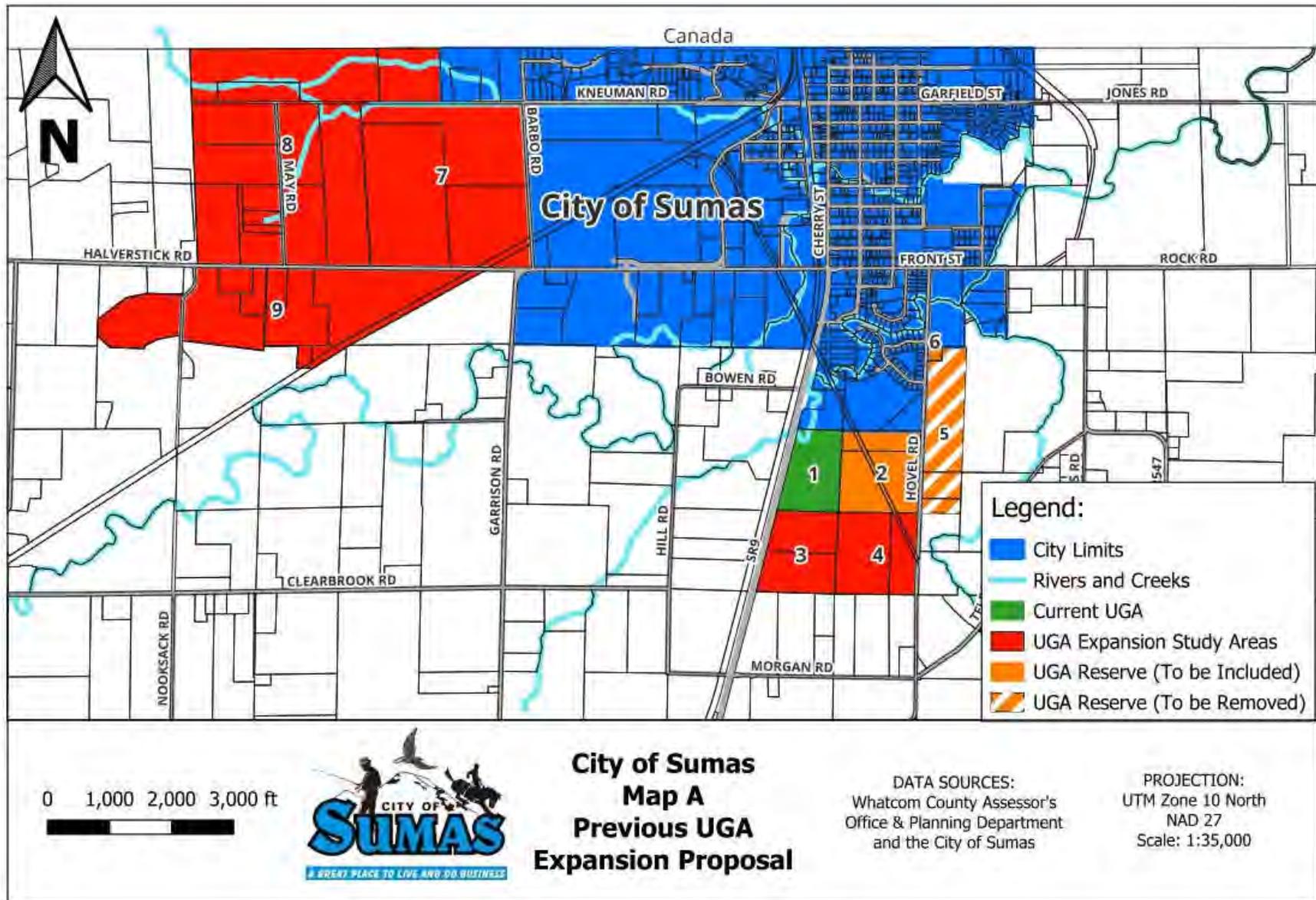
On November 20, 2025, the Whatcom County Planning Commission voted to accept the Sumas UGA proposal with the deletion of Areas 3 and 4.

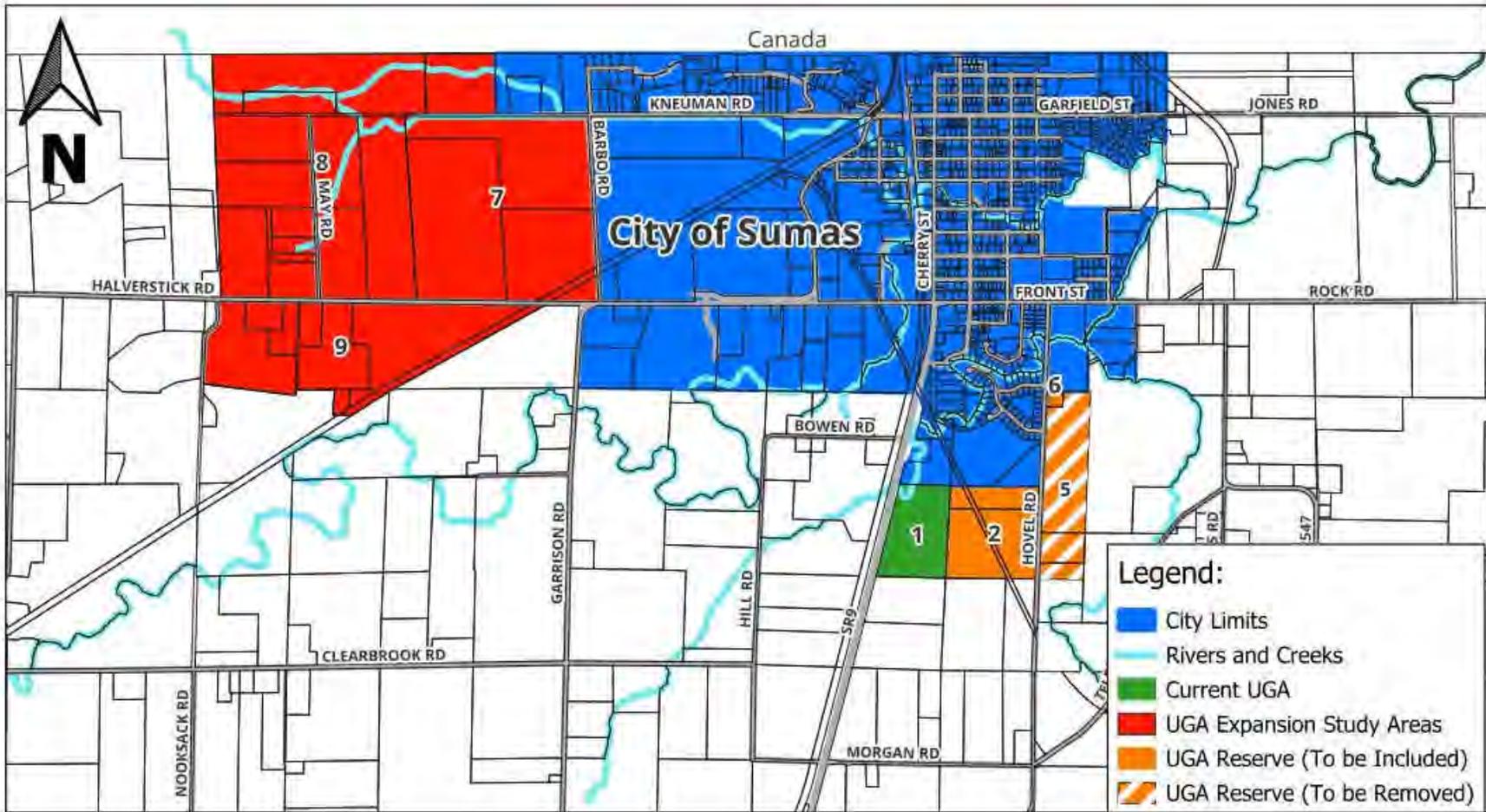
This document serves as a second addendum to the City of Sumas UGA and UGA Reserve Proposal (UGA Proposal), identifying changes to Sumas' UGA Proposal and resultant amendments to the City's Land Capacity Analysis. Other topics of consideration such as UGA expansion into a floodplain and de-designation of agricultural lands are covered in the first addendum document and are thus not included below.

II. Urban Growth Area (UGA) Proposal

The City of Sumas is hereby amending its UGA and UGA Reserve Proposal (UGA Proposal) to be consistent with the recommendations provided by the Whatcom County Planning Commission, as well as an additional limited amendment derived from internal discussions. The maps provided below show the changes that have been made to the Sumas UGA Proposal since the issuance of the October 20, 2025, UGA Proposal Addendum document.

As a condition of the Whatcom County Planning Commission's acceptance of the Sumas UGA Proposal, the Commissioners wished to see Areas 3 and 4 of the previous proposal deleted. In accordance with this condition, Areas 3 and 4 of the previous proposal have been removed from consideration. Additionally, through internal decision-making processes, a slight amendment has been made to Area 9 of the Sumas UGA Proposal, removing a nearly 22-acre parcel west of Crape Road. These changes are reflected in Map B of the maps provided below. An additional Map C is also provided which shows the UGA proposal in relation to the effective FEMA 100-year regulatory floodplain.





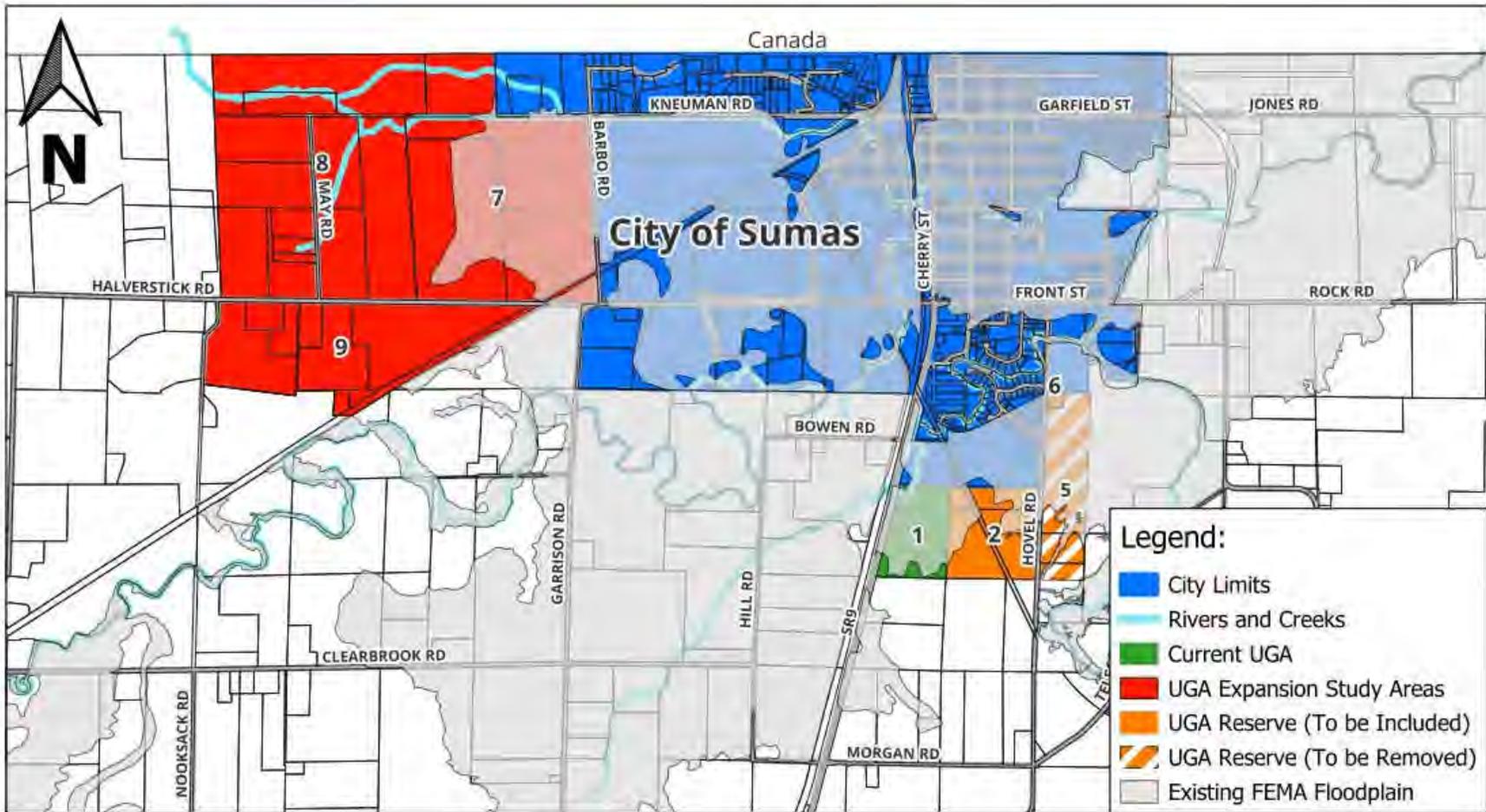
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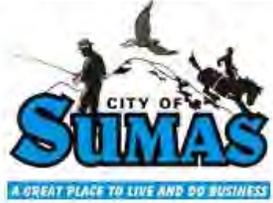
**City of Sumas
Map B
New UGA
Expansion Proposal**

DATA SOURCES:
Whatcom County Assessor's
Office & Planning Department
and the City of Sumas

PROJECTION:
UTM Zone 10 North
NAD 27
Scale: 1:35,000



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**City of Sumas
Map C
UGA Proposal
Existing FEMA
Regulatory Floodplain**

DATA SOURCES:
Whatcom County Assessor's
Office & Planning Department
and the City of Sumas

PROJECTION:
UTM Zone 10 North
NAD 27
Scale: 1:35,000

III. Population and Employment Land Capacity

Below are previous iterations of Tables 6 and 7 showing the Population and Employment Land Capacity Analysis Results from the first Addendum document associated with the above Map A. These results showed a moderate surplus of capacity for population growth and a slight surplus of capacity for employment growth.

Previous Table 6. Proposed UGA - Population Land Capacity Analysis Results		
1	Population Growth Capacity of Proposed UGA	1,341
2	Population Growth Allocation Proposed	1,000
3	Surplus (Deficit)	341

Previous Table 7. Proposed UGA - Employment Land Capacity Analysis Results		
1	Employment Growth Capacity of Proposed UGA	540
2	Employment Growth Allocation Proposed	500
3	Surplus (Deficit)	40

With the new proposed changes to Sumas' UGA Proposal associated with the above Map B, the City was able to reduce the overall Population Land Capacity to a slight surplus of 179 people, roughly half the size of the previous surplus. The Population Land Capacity surplus was reduced as well, Table 7 now shows a slight deficit of 3 jobs. While a surplus in jobs is always preferred to a deficit, this new proposed deficit is so slight that it is acceptable to the City.

Updated Table 6. Proposed UGA - Population Land Capacity Analysis Results		
1	Population Growth Capacity of Proposed UGA	1,179
2	Population Growth Allocation Proposed	1,000
3	Surplus (Deficit)	179

Updated Table 7. Proposed UGA - Employment Land Capacity Analysis Results		
1	Employment Growth Capacity of Proposed UGA	497
2	Employment Growth Allocation Proposed	500
3	Surplus (Deficit)	(3)

IV. Housing Land Capacity

The below iteration of Table 8 from the Addendum document shows Housing Land Capacity Analysis results associated with the above Map A. The surplus in total housing capacity shown in this table equates to roughly 16% of the total aggregated housing needs. This is a relatively high surplus amount.

Previous Table 8. Proposed UGA – Housing Land Capacity Analysis Results

Income Band (AMI)	Aggregated Housing Needs	Total Capacity of Proposed UGA	Surplus (Deficit)
0-80%	427	457	30
80-120%	61	119	58
120+%	124	138	14
Total	612	714	102

NOTE: AMI means “Area Median Income”

Below is the updated iteration of Table 8 associated with the UGA Proposal areas shown in Map B. These results show a significant reduction in the total housing unit surplus. The new housing unit surplus equates to only about 5 percent of the total aggregated housing needs. These new results show Sumas’ new UGA proposal to meet the future needs of Sumas’ population and housing growth allocation while providing for the majority of Sumas’ employment allocation.

Updated Table 8. Proposed UGA – Housing Land Capacity Analysis Results

Income Band (AMI)	Aggregated Housing Needs	Total Capacity of Proposed UGA	Surplus (Deficit)
0-80%	427	427	0
80-120%	61	77	16
120+%	124	136	12
Total	612	640	28

NOTE: AMI means "Area Median Income"

IV. Conclusions

This second Addendum document provides a new UGA Proposal for Sumas which reflects the recommendations of the Whatcom County Planning Commission while reducing the overall surplus in population, employment, and housing capacity to manageable levels. This new proposal continues to provide Sumas with the land area needed to accommodate growth, while addressing external concerns related to sprawl by reducing the overall proposed UGA land area by roughly 16%. Whatcom County and the City of Sumas will continue deliberations before a final UGA Proposal can be accepted, but this new proposal provides a better starting point for everyone.

Urban Growth Area Review

City of Sumas UGA/UGA Reserve Proposal Addendum

October 20, 2025

I. Introduction

On August 29, 2025, the City of Sumas submitted its UGA and UGA Reserve Proposal (UGA Proposal) to Whatcom County as part of the 2025 review and update of the city and county comprehensive plans required under the state Growth Management Act (GMA), RCW 36.70A. See the attached map that shows the City's existing urban growth area (UGA) and UGA Reserve. See also the attached map that shows the Sumas UGA Proposal, including Areas 2, 3, 4, 6, 7, 8, and 9 that are proposed to be included in the Sumas UGA.

In an email message 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 the County's concerns and provided the City's preliminary responses to these concerns. The purpose of this UGA Proposal Addendum is to provide supplemental information to address these concerns to a sufficient degree to allow the City's UGA Proposal to move forward.

In subsequent messages from the County dated September 9 and October 1, 2025, County Planning provided additional requests that the City's UGA Proposal Addendum also address Whatcom County Comp Plan Chapter 2, page 2-18, and Policy 8A-6, related to setbacks and buffers from agricultural lands in the UGA Reserves and de-designation of agricultural lands and changed circumstances. This Addendum also addresses this additional request from County Planning.

II. County Concerns

The issues/concerns raised by the County Planning Department in relation to the City's UGA Proposal included the following:

1. Population and Employment Land Capacity – The land capacity for population is about 43% higher than the population allocation (p. 9). The Proposal states "...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..." (p. 9). Our understanding of Growth Board cases is that, when UGAs are being expanded, the increased land capacity should roughly match the population allocations (more or less). The proposal causes concern with oversizing the UGA expansion.
2. Housing Land Capacity Deficits – The 0-80% AMI and 120+ AMI income band categories both show land capacity deficits (p. 9). Could Sumas consider modifying zoning the City limits and/or future zoning on land in the proposed UGA outside of City limits to eliminate deficits in these income band categories?

3. Sewer Plan – The City’s proposal states the City transmits wastewater to Abbotsford for treatment (p. 10). Do you know approximately when the Abbotsford sewer plan will be completed? Will it plan for sewer facilities through the year 2045 for Sumas? Additionally, if not in the Abbotsford sewer plan, Sumas would have to provide capital facility information required by RCW 36.70A.70(3) relating to the City and the proposed UGA:

A capital facilities plan element consisting of: (a) An inventory of existing capital facilities owned by public entities, including green infrastructure, showing the locations and capacities of the capital facilities; (b) a forecast of the future needs for such capital facilities; (c) the proposed locations and capacities of expanded or new capital facilities; (d) at least a six-year plan that will finance such capital facilities within projected funding capacities and clearly identifies sources of public money for such purposes; and (e) a requirement to reassess the land use element if probable funding falls short of meeting existing needs and to ensure that the land use element, capital facilities plan element, and financing plan within the capital facilities element are coordinated and consistent

When UGAs are being expanded, the Growth Board has required adopted capital facilities plans (draft plans are not sufficient).

4. Naturally Occurring Asbestos – One of the criteria for expanding a UGA into a UGA Reserve is addressing risk from Naturally Occurring Asbestos (p. 13). This will need to be addressed in greater detail.
5. Floodplain – The GMA provision cited in the Sumas proposal on p. 13 (RCW 36.70A.110(10)(b)(iii)(C)) states:

(iii) Urban growth area expansions where: ...

(C) The land is owned by a jurisdiction planning under this chapter or the rights to the development of the land have been permanently extinguished, and the following criteria are met:

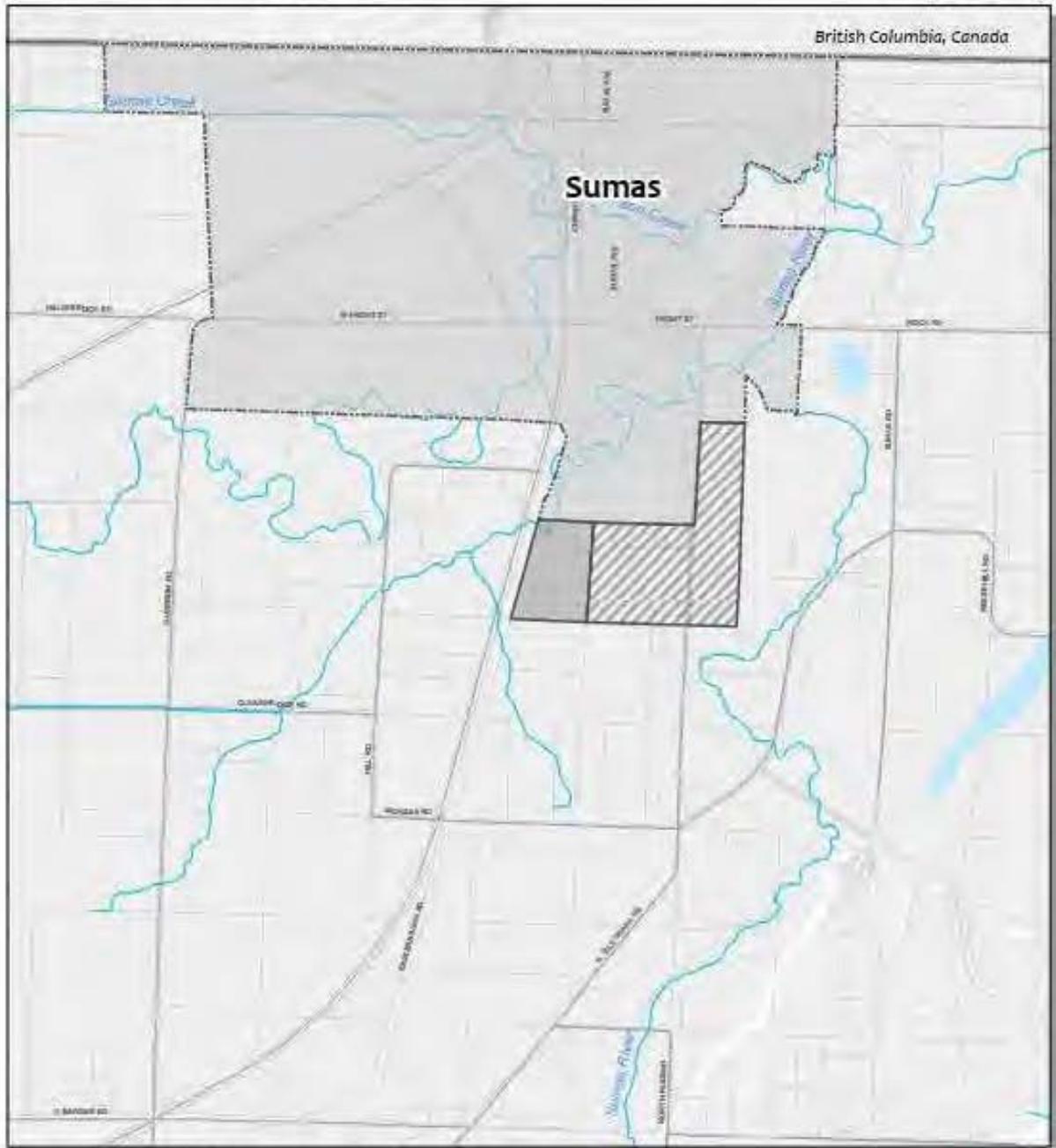
(I) The permissible use of this land is limited to one of the following: Outdoor recreation; environmentally beneficial projects, including but not limited to habitat enhancement or environmental restoration; stormwater facilities; flood control facilities; or underground conveyances; and

(II) The development and use of such facilities or projects will not decrease flood storage, increase stormwater runoff, discharge pollutants to fresh or salt waters using normal operations or floods, or increase hazard to people and property.

Is the land proposed to be added to the UGA currently owned by the City? If not, have development rights already been permanently extinguished? One of these conditions must already be in place before the County can consider expanding the UGA into such areas.

6. Agricultural Land – The UGA Proposal Template asked cities proposing to expand UGAs into designated Ag lands to address the policies in Whatcom County Comp Plan Chapter 8. There are a number of policies that may be relevant to the proposal. Policy 8A-3, relating to de-designation of Ag lands, is particularly important and needs to be addressed. We would also like to discuss mitigation for loss of Ag land in more detail.
7. Setback/Buffering from Ag Lands – The criterion for expanding UGAs into UGA Reserves (County Comp Plan Chapter 2, p. 2-82) includes addressing potential incompatibility with adjacent Ag land (p. 14).
8. Re-designation Criteria – The County asks that the City address Whatcom County Comprehensive Plan Policy 8A-6:

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



- Sumas Urban Growth Area

-  City of Sumas
-  Urban Growth Area
-  Urban Growth Area Reserve

City of Whatcom County's jurisdiction extends to the county boundary. All rights reserved. No representation is made concerning the accuracy, reliability, or completeness of the information on this map. The use of this map does not constitute an endorsement or approval by Whatcom County of any product or service mentioned herein. Whatcom County is not responsible for any errors or omissions on this map.

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III. Population and Employment Land Capacity

The initial results from the City’s land capacity analysis were included in the UGA Proposal that was submitted in late August. These results showed a significant surplus of capacity for population growth. Since submitting the UGA proposal, the City has continued to refine the choices and assumptions incorporated into the land capacity analysis. As a result of minor adjustments to the anticipated density of planned industrial growth, the City’s land capacity results now show a significantly smaller surplus for both population and employment growth.

Updated Table 6. Proposed UGA - Population Land Capacity Analysis Results		
1	Population Growth Capacity of Proposed UGA	1,341
2	Population Growth Allocation Proposed	1,000
3	Surplus (Deficit)	341

Updated Table 7. Proposed UGA - Employment Land Capacity Analysis Results		
1	Employment Growth Capacity of Proposed UGA	500
2	Employment Growth Allocation Proposed	40
3	Surplus (Deficit)	540

IV. Housing Land Capacity Deficits

The City of Sumas has been working to comply with the housing requirements established under HB 1220, while still addressing land capacity requirements under the GMA. Although the City’s UGA Proposal showed an initial surplus of capacities in moderate-income housing categories and a deficit in low- and high- income housing categories, the City has been working to refine our housing allocation assumptions to reduce this excess capacity. The updated results presented in the table below show the most-recent results from the land capacity analysis for housing units within various income bands.

Updated Table 8. Proposed UGA – Housing Land Capacity Analysis Results

Income Band (AMI)	Aggregated Housing Needs	Total Capacity of Proposed UGA	Surplus (Deficit)
0-80%	427	457	30

80-120%	61	119	58
120+%	124	138	14
Total	612	714	102

NOTE: AMI means "Area Median Income"

As can be seen, the land capacity analysis now shows minimal surpluses for the low and high income bands. A modest, but reduced, surplus of housing units still remains in the moderate-income (80-120% AMI). The City will continue to work to reduce the overall surplus to the maximum extent possible given the statutory constraints under HB 1220.

IV. Sewer Plan

The City of Sumas is uncommon amongst cities in that we do not treat our own sewage, rather we contract with the City of Abbotsford in British Columbia, Canada to have our sewage transferred to their treatment plant for processing. This current contract with the City of Abbotsford was initially signed in 2008 and is set to expire in 2028. Subsequently, the City of Abbotsford is scheduled to update their Abbotsford-Mission Joint Wastewater Master Plan in 2028 as well. The Joint Wastewater Master Plan was last updated in May 2018 and has a planning horizon of 25 years, ending in 2043.

The GMA requires that jurisdictions include a Capital Facilities element in their Comprehensive Plans which, among other things, requires Cities to describe existing facilities and forecast future needs to determine what future facilities upgrades may be required to accommodate increased demand. These Capital Facilities plans are required to accommodate growth through the year 2045. While it does not completely reach the 2045 planning horizon, the Abbotsford-Mission Joint Wastewater Master Plan does have a planning horizon of 2043 and does include Sumas' wastewater inputs into its projections. To supplement this work, the City will also be adding additional information to the Sewer System section of the Sumas Comprehensive Plan Update that will give more details regarding projected capital projects and funding costs.

V. Naturally-Occurring Asbestos

Whatcom County's concern regarding potential risks related to naturally-occurring asbestos pertains only to the City's proposal to convert the portion of the existing UGA Reserve that lies on the west side of Hovel Road to full UGA Status. Although the County has asked Sumas to demonstrate that risks related to the potential presence of naturally occurring asbestos have been reduced to acceptable levels,

the County has not specified what constitutes an acceptable level of risk. Nevertheless, the City is confident that the existing geographic, topographic, and regulatory conditions already in place are sufficient to reduce risks from naturally occurring asbestos within the UGA Reserve to negligible or insignificant levels.

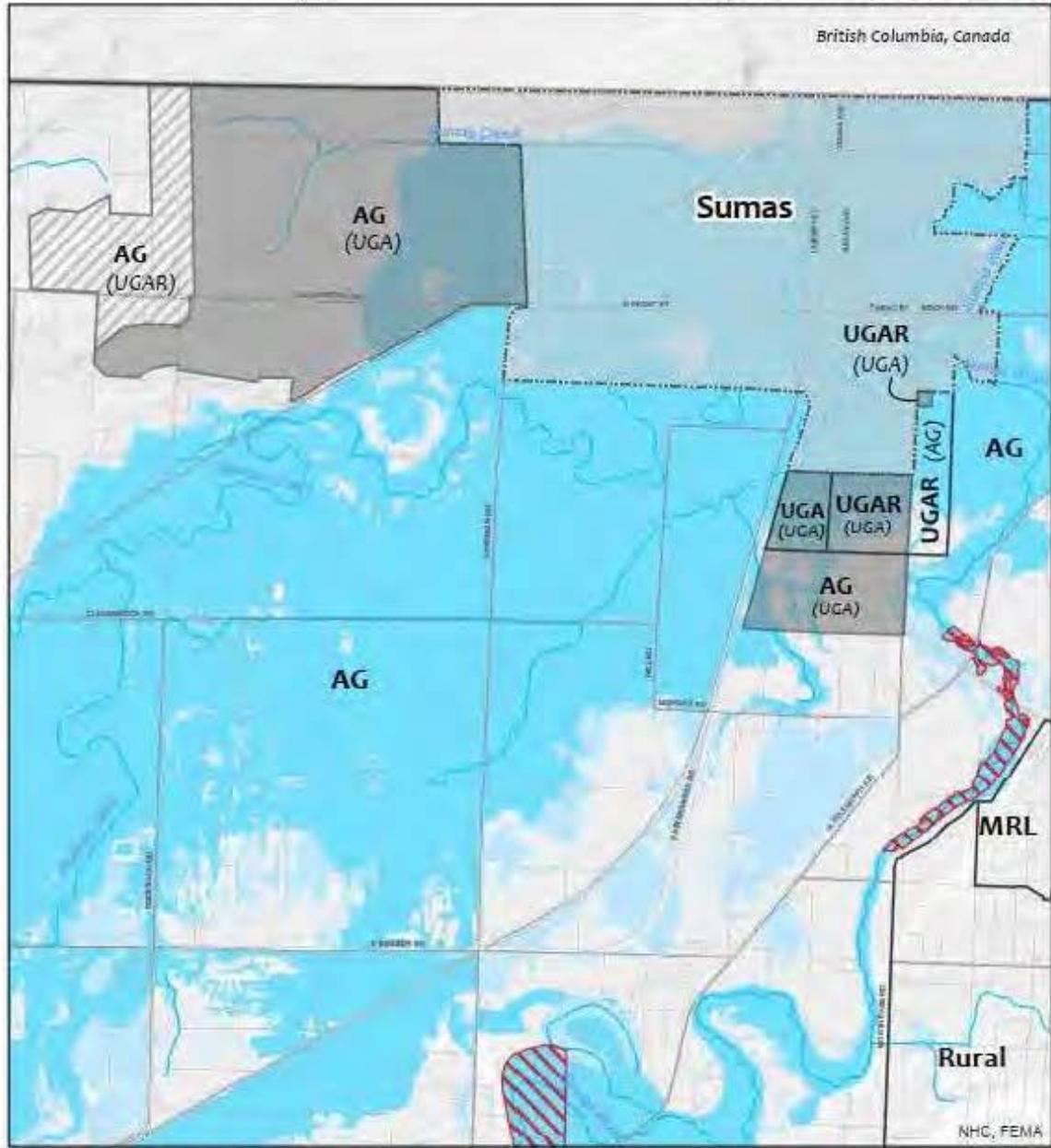
First, any naturally occurring asbestos that makes its way into the UGA Reserve would have to come by way of a flood from the Sumas River. In late 2021, the Sumas River did flood but was unable to reach the section of the UGA Reserve due to the presence of Hovel Road blocking the water from reaching that area. Because of this and other first-hand accounts, the City is confident that the area of UGA Reserve that we are proposing to give full UGA status is safe from exposure to naturally occurring asbestos.

VI. Floodplain

The County has raised a concern that the proposed UGA expansion areas 2, 3, 7, and 9 include expansions into the floodplain of the Nooksack River. The City is aware of these expansions into the floodplain and feel that to do so is necessary for the future of Sumas. Sumas is in a unique situation in that virtually all areas surrounding Sumas' existing UGA are within the floodplain. The proposed expansion area to the south and a small portion of the expansion area to the west are the only portions surrounding the Sumas UGA that are not within the existing floodplain. This has left Sumas with incredibly few options for where the boundaries of our UGA may be able to grow.

RCW 36.70A.110(10)(b) provides certain exceptions to the restriction that UGAs cannot be expanded into a floodplain, shown above in Section II of this document. One of these exceptions provides that jurisdictions may expand UGA into floodplains on the condition that areas of the proposed UGA expansion located within a floodplain are owned by the jurisdiction or that the land's development rights have been permanently extinguished and must be used for open spaces or other similar such purposes.

As the areas of the Sumas UGA expansion which are located within the floodplain are virtually all used for agricultural purposes, these uses would continue after annexation. The City does not own these areas and their development rights have not yet been extinguished. However, the City is working with the owners of these properties to ensure that those areas will have their development rights extinguished prior to adoption of the Comprehensive Plan.



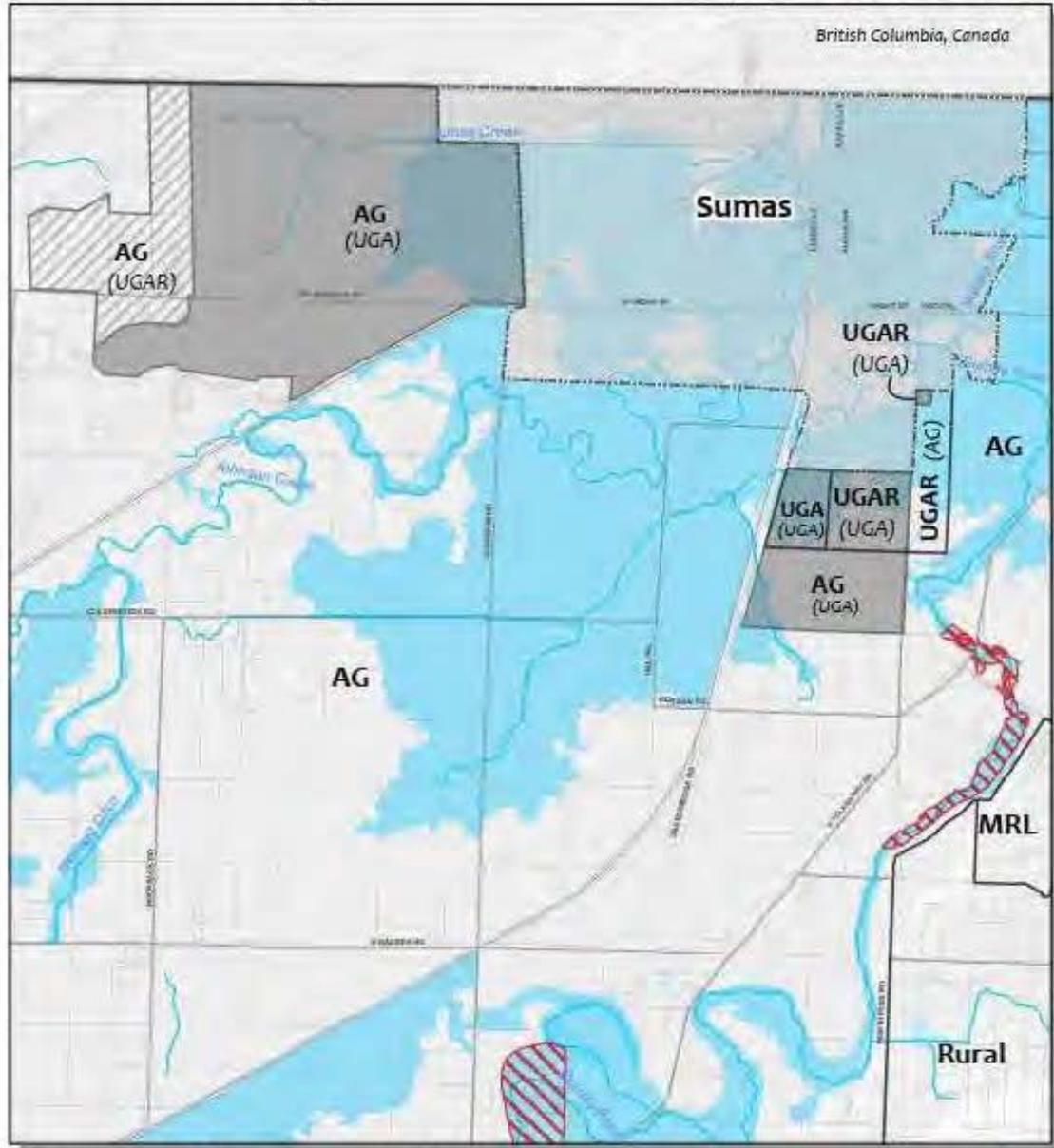
- Sumas Urban Growth Area

- 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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Map data is for informational purposes only. It is not intended to be used for any other purpose. The user assumes all responsibility for any use of this map. The user agrees to hold the County harmless for any use of this map.

2025



- Sumas Urban Growth Area

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

For more information on this project, please contact the Planning Department at (360) 885-3300. This map is for informational purposes only and does not constitute a contract. The City of Sumas is not responsible for any errors or omissions. The City of Sumas is not responsible for any damages or losses resulting from the use of this map. The City of Sumas is not responsible for any claims or liabilities arising from the use of this map. The City of Sumas is not responsible for any claims or liabilities arising from the use of this map.

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VII. Agricultural Land

As stated in the City's UGA Proposal, all lands surrounding Sumas are zoned Agriculture by the County. The County's Agricultural zoning somewhat conforms to the requirements of a natural resource lands designation, the criteria for which are listed in Chapter 8 of the Whatcom County Comprehensive Plan. In order to change the designation of a natural resource land to UGA, there is a specific set of criteria related to designating agricultural lands that must be addressed in order to have the property de-designated. Below are a list of those criteria and the City of Sumas' response to those criteria in italics:

1. The land is not already characterized by urban growth. In determining this factor, the County should consider WAC 365-196-310 and RCW 36.70A.030(19).
 - i. *The land to the west is not characterized by urban growth, but a majority of the area is made up of residences and not characterized by agricultural uses.*
2. The land is used or capable of being used for agricultural production. In making this determination, the County shall use the land-capability classification system of the U.S. Department of Agriculture Natural Resources Conservation Service. These eight classes are incorporated into map units and are based on the growing capacity, productivity, and soil composition of the land.
 - i. The UGA expansion areas are all generally capable of being used for agricultural production.
3. The land has long term commercial significance for agriculture. In determining this factor, consider the following nonexclusive criteria:
 - a. The majority of the area contains Prime Farmland Soils as determined by the Natural Resource Conservation Service (NRCS).
 - i. *The UGA expansion area to the west of town is primarily Laxton soil which is characterized as being good soil for agricultural use but also good for buildings and development. The City of Sumas has developed residential neighborhoods on these same types of soils atop Moe Hill on Ridgeview St and Arthurs Way.*
 - b. The area may contain 100-year floodplains as delineated by the Federal Emergency Management Agency (FEMA).
 - i. *Although portions of the proposed UGA areas are located within the 100-year flood, a majority of the areas are not. Please see*

Section VI of this document which provides more information on this issue.

- c. Land use settlement patterns, the intensity of nearby uses, and the history of approved land development permits are generally compatible with agricultural practices.
 - i. *These proposed UGA expansion areas are characterized by both urban and agricultural settlement patterns in their general vicinity. The areas to the south are currently used for agriculture, and the areas to the west are used for a mix of hobby farms and rural residential development.*
- d. A majority of the area is composed of agricultural operations that were historically in agriculture prior to 1985.
 - i. *The UGA expansion areas to the south of town were composed of agricultural operations prior to 1985, however a majority of the UGA expansion areas to the west do not have a history of agricultural operations prior to 1985.*
- e. The predominate parcel size in the area is large enough to adequately maintain agricultural operations.
 - i. *The average parcel size in the UGA expansion areas to the south of town is 12.4 acres. This parcel size is somewhat adequate to maintain agricultural operations. The average parcel size in the UGA expansion areas to the west is 18.7 acres. This parcel size is similarly somewhat adequate to maintain agricultural operations.*
- f. The availability of public services.
 - i. *The UGA expansion areas are close in vicinity to Sumas City Limits. They are near the Sumas City road network, including State Route 9 to the south, and are already serviced by Sumas City Water through our wholesale agreements with the Sumas Rural Water Association in the South and the Nooksack Valley Water Association in the West. Services that would need to be extended to those areas include sanitary sewer and storm sewer.*
- g. The availability of public facilities such as roads used to transport agricultural products.
 - i. *The UGA expansion area to the south is bordered to the west by State Route 9, a regional highway featuring high speeds, and to the east by Hovel Road, a County road which features lower speeds but provides access to Sumas' Hovel Estates housing*

development. The UGA expansion area to the west exists along either side of Halverstick Road, a County road that provides connection from Sumas to the farmlands farther west of town, and eventually to Lynden.

- h. Special purpose districts that are oriented to enhancing agricultural operations such as drainage improvement, watershed improvement, and flood control exist.
 - i. *Sumas and the surrounding areas lie within the Sumas Watershed Improvement District (SWID) which handles waterway improvements, drainage, and some amounts of flood control.*
- i. 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.
 - i. *The UGA expansion area to the south of town is actively used for agricultural operations and does include the use of irrigation and drainage, although there are no barns on those properties. The UGA expansion area to the west of town has some agricultural operations but a majority of the area is not used in that capacity. Many of those residences do have barns and support buildings to service their hobby farms, but none of those buildings are of a commercial nature.*
- j. The area contains a predominance of parcels that have current use tax assessment derived from the Open Space Taxation Act.
 - i. *A majority of the UGA expansion areas to the south and west have the tax designation of OSAG Dairy. Some of the areas to the west have the tax designation OSAG Ranches, DESIG Forest, and RESIDENTIAL.*
- k. The area's proximity to urban growth areas.
 - i. *All UGA expansion areas are either directly adjacent to the Sumas UGA or are within 1 mile of the Sumas UGA.*
- l. The area's proximity to agricultural markets.
 - i. None of the proposed UGA expansion areas are close to major agricultural markets, but rather, all of these areas are quite close to Sumas.
- m. Land value under alternative uses.

- i. Generally, land value tends to rise significantly when land is included into a UGA. Even more so when annexed into a jurisdiction. All properties included in the UGA expansion area would see their property values go up significantly.*

VIII. Setback/Buffering from Ag Lands

The County's concern regarding setbacks and buffering from agricultural lands pertains only to the City's proposal to convert the existing UGA Reserve to full UGA status. It is the City's assumption that this concern is intended to reduce potential conflicts between new uses in the City and ongoing agricultural activities in the county. No specific comments or concerns from the owners of properties located adjacent to the UGA Reserve (Area 2) have been provided by the County, nor have any such concerns been received by the City. Additionally, there would be no parcels immediately adjacent to Area 2 which would be zoned Agriculture by the County. Area 2 is bordered to the north by Sumas City Limits, to the west by Sumas' existing UGA, to the east by Hovel Road, and to the south by additional areas of the Sumas UGA proposal.

If the County can provide a solid basis for needing increased setbacks or buffering between residential and adjacent agricultural uses, the City would be willing to discuss establishing such zoning provisions prior to annexation of the current UGA Reserve.

IX. Re-Designation Criteria – Changed Conditions

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.

All areas of Sumas' UGA expansion proposal is designated as Agricultural lands. These areas have been zoned Agriculture for many decades, including prior to the enactment of the Growth Management Act. Since their initial designation as Agricultural Lands, these areas (and the areas immediately surrounding them) have been subject to a number of important changed conditions and circumstances that have a direct bearing on the appropriateness or inappropriateness of their current designations.

The City of Sumas has expanded its city limits towards these UGA expansion areas. In 1997 and 1999, the City of Sumas annexed property to the west of town, expanding Sumas' Industrial District. In 2003, the Washington State Department of Transportation (WSDOT) re-aligned State Route 9, having the route use Easterbrook Road to approach Sumas, as opposed to Garrison Road farther west. In 2006 and 2009, the City of Sumas annexed property to the south of town,

expanding Sumas' residential base and building a new community park and baseball fields along the re-aligned State Route 9. The City has not expanded its boundaries since that 2009 annexation. Prior to these annexations, the proposed UGA expansion areas were near Sumas but not directly adjacent. Now, they are adjacent, making them more suitable for Urban Development.

X. Withdrawal of UGA Reserve Proposal

The current UGA expansion proposal shows that the City would like to change the designation of the land labeled Area 10 from Agriculture to UGA Reserve. In consultation with Whatcom County Planning and Development Services, the City of Sumas is willing to postpone adding Area 10 to UGA Reserve, as well as leaving Area 10 off the UGA proposal all together, with the intent of revisiting the proposal following the conclusion of this Comprehensive Plan Update process. This will save time and resources on a proposal which is not required at this time and can be revisited later.

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 residential capacity and risks associated with flooding 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. In this UGA Proposal Addendum, the City has provided information that should supplement the information included in the City's initial UGA Proposal. This additional information has been provided in response to requests received from County Planning and Development Services. The City will continue to work in cooperation with the County to provide all of the information needed to support the City's UGA Proposal.

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 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.

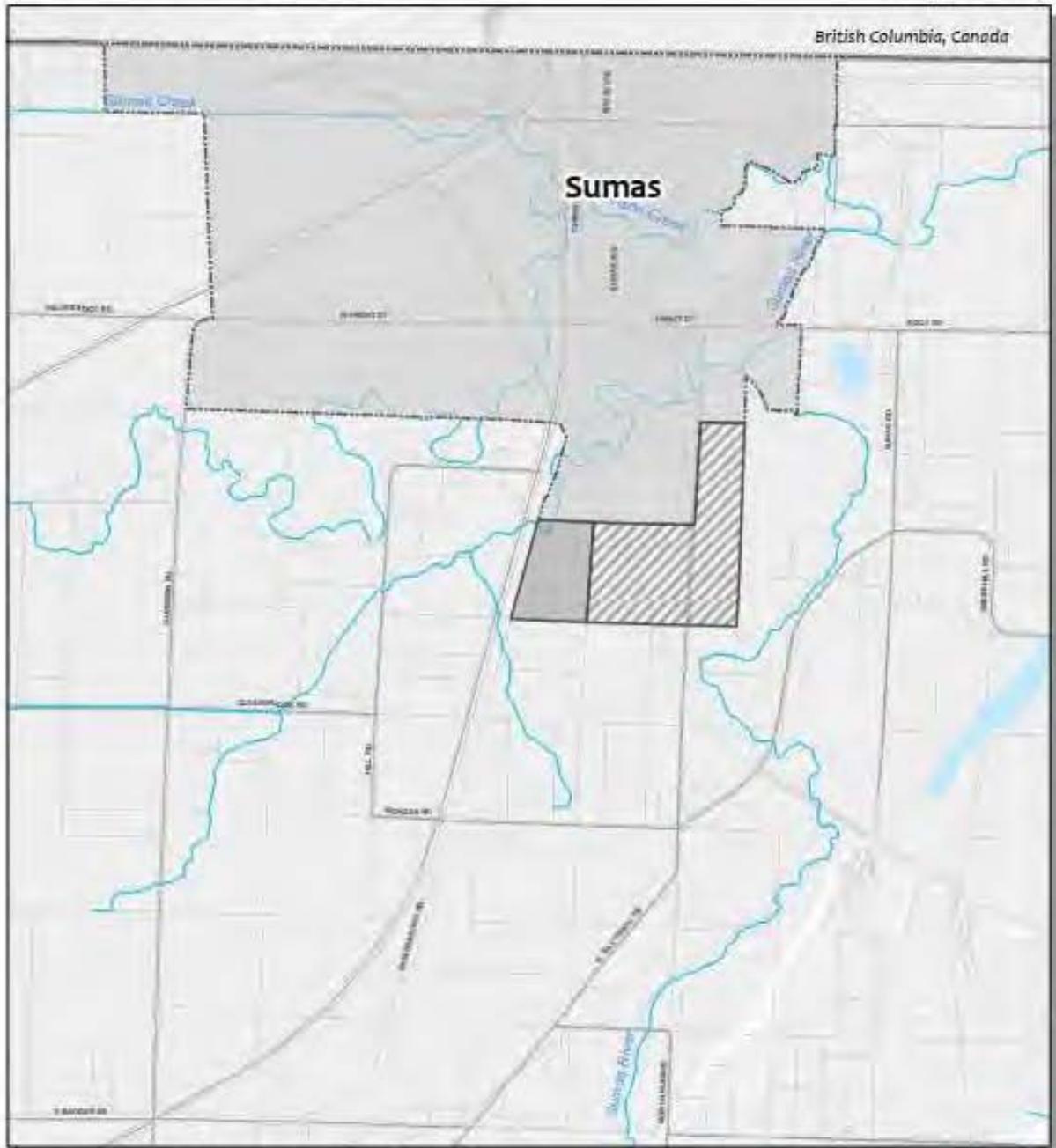
Existing interlocal agreements indicate that the County and cities will work together to develop proposed population and employment allocations to UGAs and review UGA boundaries. The County and cities are recommending UGA boundary proposals for their respective UGAs. Review of these proposals includes 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 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

USE OF WHATCOM COUNTY'S GIS DATA ON THIS MAP IS FOR INFORMATIONAL PURPOSES ONLY. WHATCOM COUNTY DOES NOT WARRANT THE ACCURACY, COMPLETENESS, OR QUALITY OF THE DATA OR THE MAP. THE USE OF THIS MAP CONSTITUTES AN ACKNOWLEDGMENT OF THE USER'S RESPONSIBILITY TO VERIFY THE DATA AND TO TAKE APPROPRIATE PRECAUTIONS TO AVOID LIABILITY FOR ANY DAMAGE, LOSS, OR INJURY RESULTING FROM THE USE OF THIS MAP.

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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.

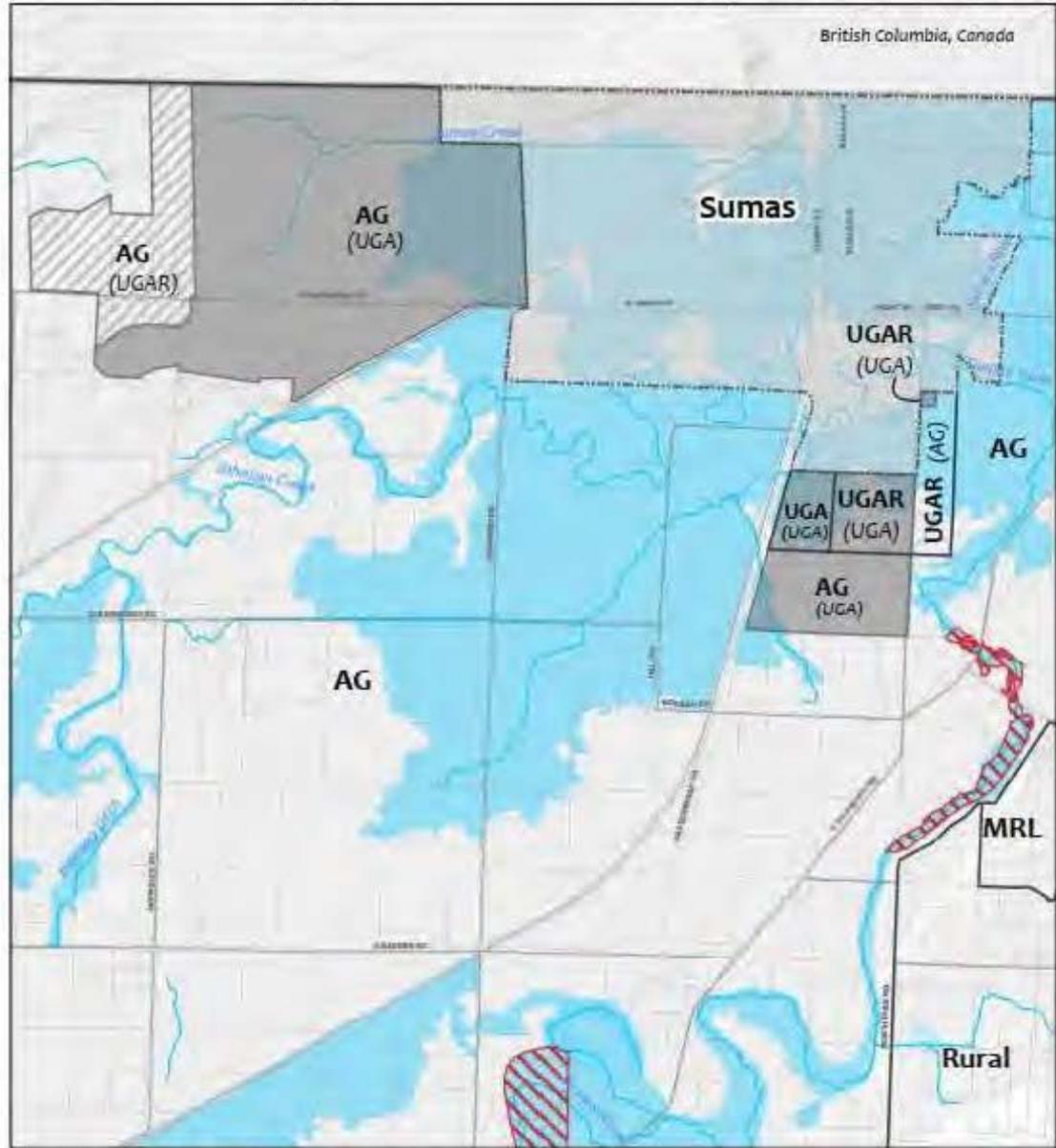
V. UGA / UGA Reserve Boundary Proposal

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.

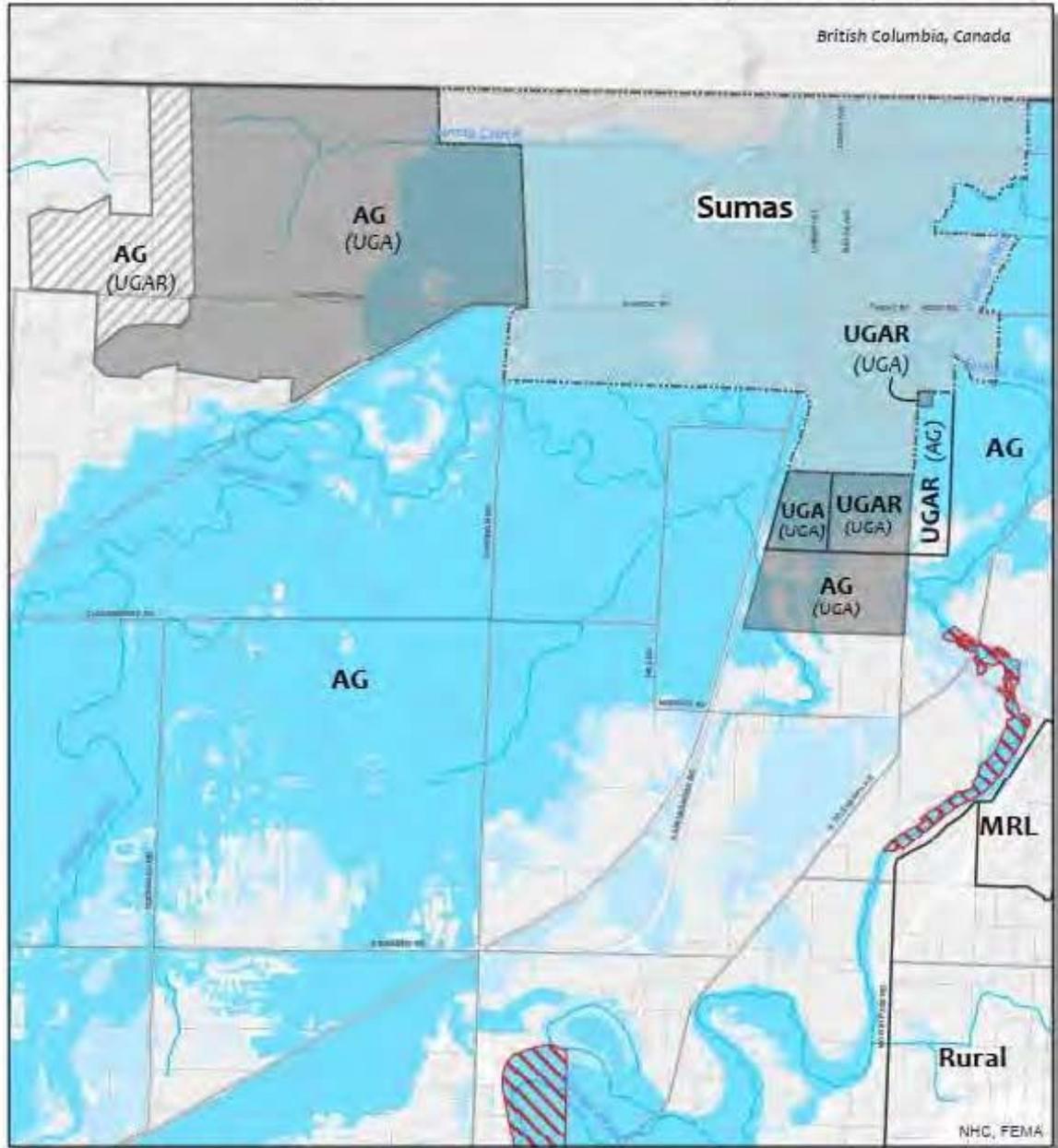


- Sumas Urban Growth Area

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

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- Sumas Urban Growth Area

- City of Sumas
 - 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)
 - Nookack 1p75x 100 Year Flood
- Net change in AG designation - 702 ac. to UGA/UGAR

DESIGNED AND PREPARED BY: [unreadable]

WHERE NEARBY NEIGHBORHOODS ARE AFFECTED BY THE PROPOSED CHANGES TO THE UGA/UGAR, THE CITY OF SUMAS WILL BE REQUIRED TO CONDUCT A NEIGHBORHOOD IMPACT STUDY (NIS) TO DETERMINE THE IMPACTS OF THE PROPOSED CHANGES ON THE NEIGHBORHOODS AND TO DEVELOP A PLAN OF ACTION TO ADDRESS THE IMPACTS. THE CITY OF SUMAS WILL BE REQUIRED TO CONDUCT A NEIGHBORHOOD IMPACT STUDY (NIS) TO DETERMINE THE IMPACTS OF THE PROPOSED CHANGES ON THE NEIGHBORHOODS AND TO DEVELOP A PLAN OF ACTION TO ADDRESS THE IMPACTS.

2025

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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.