



WHATCOM COUNTY PLANNING COMMISSION

5280 Northwest Drive
Bellingham WA 98226

AGENDA November 14th, 2024

The Whatcom County Planning Commission will hold a **hybrid** meeting at 6:30 p.m., with the option to attend remotely or in person at 5280 Northwest Drive, Bellingham.

- Call to Order
- Roll Call
- Flag Salute
- Department Update
- Open Session for Public Comment
- Commissioner Comments
- Approval of Minutes of: October 24, 2024
- Meeting Topic – Public Hearing and Work Session regarding:
 - *Population and employment projections associated with the Whatcom County Comprehensive Plan update and the urban growth area review, which are required by the Growth Management Act under RCW 36.70A.130.*
- Unfinished Business
- Adjournment

NOTE: For information on how to watch and participate in the meeting in real time, please visit the following web page: [Participate in Virtual Planning Commission Meeting](#)

Individuals who require special assistance to participate in the meetings are asked to contact "PDS_Planning_Commission@co.whatcom.wa.us" at least 96 hours in advance.

There are nine members on the Whatcom County Planning Commission. If you will be giving written information to the Commissioners, please give a copy to the Coordinator for our office files.

*For more information please contact Aileen Kogut-Aguon at (360)778-5935 or
PDS_Planning_Commission@co.whatcom.wa.us
5280 Northwest Drive, Bellingham WA 98226*



**RECORD OF PROCEEDINGS OF THE
WHATCOM COUNTY PLANNING COMMISSION
October 24, 2024**

Public Hearing and Work Session

1

Call to Order

The meeting was called to order by Whatcom County Planning Commission Chair, Kelvin Barton at 6:31 p.m.

Roll Call

Present: Kelvin Barton, Suneeta Eisenberg, Jim Hansen, Frank James, Dominic Mocerri, Scott Van Dalen, Julie Jefferson, Stephen Jackson

Absent: Atul Deshmane

Staff Present: Steve Roberge, Alex Harris, Lauren Templeton, Lucas Clark and Aileen Kogut-Aguon

Department Update

Steve Roberge, Assistant Director of Planning and Development Services (PDS), The permit timeline changes for 5290 and Capital Improvement Plan went to the Planning Committee with Council, and will have a public hearing in November. The resolution for the Heavy Impact Industrial went to Council as well and will be considered. The Commission will have Population and Employment Projections scheduled in November and Land Capacity in December.

Commissioner Hansen encouraged staff to send the draft of the Comp Plan update as soon as possible.

Mr. Roberge responded that all the chapters for the Comp Plan have been divided into different advisory committees throughout the county in regard to subject matter, in order to do revisions in a timely manner. Not all revisions will go to Commission at once, but will be given chapter by chapter.

Commissioner Mocerri asked Mr. Roberge who will be taking his place.

Mr. Roberge stated that Mark Personius will take over Planning Commission until there is a replacement.

Open Session Public Comment

There was no public comment.

Commissioner Comments

Commissioner Van Dalen acknowledged Mr. Roberge for all of his hard work throughout his time with the Commission.

Approval of Meeting Minutes

Timestamp: 6:40

1 Commissioner Jefferson moved to approve the meeting minutes from October 10th

Commissioner Eisenberg seconded.

Roll Call Vote: Ayes- Eisenberg, Van Dalen, James, Mocerri, Hansen, Barton

Abstain- Jackson, Jefferson (Ayes-6; Nays-0; Abstain-2). The motion carried.



**RECORD OF PROCEEDINGS OF THE
WHATCOM COUNTY PLANNING COMMISSION
October 24, 2024**

Public Hearing and Work Session

2

Open Space Applications

Timestamp: 6:42

Alex Harris, Conservation Easement Planner, provided a presentation on what Open Space is and the different programs for Open Space. Mr. Harris then spoke on the process for applying for Open Space Program. There are site visits, and the property is scored according to the Public Benefit Rating (PBR) System. Mr. Harris then presented the four properties that applied and showed the properties that are not recommended for approval and two properties that are recommended for approval.

Commissioner James asked what are the primary differences between the agricultural land and the open space farm and agricultural conservation land.

Mr. Harris responded that the difference between the two designation is dependent on the criteria of the PBR system.

Commissioner Hansen asked what are the current number of acres that are actually under cultivation or readily available for cultivation.

Mr. Harris answered that in 2017 there were 130,000 acres of farmland in Whatcom County, but he has not seen the updated census to verify the current number.

a) Public Hearing and Work Session Regarding Open Space Applications

Timestamp: 7:20

There was no public comment.

Commissioner Chair Barton suggested going through each property individually.

Commissioner Jackson stated that the Commission in the past have adopted staff's recommendation based on the scores of the property.

Timestamp: 7:22

2Commissioner Jackson moved to follow staff recommendation to not approve the Fisher Property OSP2024-00001.

Commissioner Jefferson seconded.

Roll Call Vote: Ayes- Mocerri, Jackson, Jefferson, Van Dalen, James, Eisenberg, Hansen, Barton

(Ayes- 8; Nays- 0; Abstain- 0). The motion carried.

Timestamp: 7:30

3Commissioner Hansen moved to recommend approval to the RJ Group OSP2024-00003

Commissioner Jefferson seconded.

Commissioner Jefferson asked what would be the turn-around for the property owners to reapply for the program before needing to pay back taxes.

Lauren Templeton, Conservation Easement Planner responded that the applicant can apply for the program again, but would still have to pay the back taxes to enroll in the open space agricultural program.



**RECORD OF PROCEEDINGS OF THE
WHATCOM COUNTY PLANNING COMMISSION
October 24, 2024**

Public Hearing and Work Session

3

Commissioner Hansen stated that as a member of the Forest Resilience Task Force, the forested lands plays an important function in both in recharging our aquifers and regulating climate.

Commissioner Eisenberg echoed Commissioner Hansen's concerns about deforestation and what it would do to the climate and the land if excess trees get cut down.

Commissioner James asked if the application is rejected, would there be any reassurance that the trees won't get cut down.

Mr. Harris responded that the regardless if the application does not get approved, the land would still be subject to follow the building regulations administered by PDS and forest practices administered by the Department of Natural Resources.

Roll Call Vote: Ayes- Hansen

Nays- Jackson, Jefferson, James, Mocer, Van Dalen, Barton

Abstain- Eisenberg (Ayes- 1; Nays- 6; Abstain-1). The motion fails.

Timestamp: 7:37

4Commissioner Hansen moved to accept staff's recommendation to approve the Nachreiner application OSP2024-00004

Commissioner Jefferson seconded.

Roll Call Vote: Ayes- Van Dalen, Jackson, Jefferson, James, Mocer, Hansen, Eisenberg, Barton

(Ayes- 8; Nays-0; Abstain-0). The motion carried.

Timestamp: 7:39

5Commissioner Jackson moved to adopt the recommendation from staff to approve the Greenbaum application OSP2024-00005

Commissioner Jefferson seconded.

Roll Call Vote: Ayes- Eisenberg, Hansen, Jackson, Jefferson, James, Mocer, Van Dalen, Barton

(Ayes- 8; Nays- 0; Abstain- 0). The motion carried.

Timestamp: 7:41

6Commissioner Mocer moved to accept staff's recommendation to not approve the RJ Group application OSP2024-00003.

Commissioner Van Dalen seconded.

Roll Call Vote: Ayes- Van Dalen, Jackson, Jefferson, James, Mocer, Eisenberg, Barton

Nays- Hansen

(Ayes- 7; Nays- 1; Abstain- 0). The motion carried.

Timestamp: 7:43



**RECORD OF PROCEEDINGS OF THE
WHATCOM COUNTY PLANNING COMMISSION
October 24, 2024**

Public Hearing and Work Session

4

Lummi Height

Timestamp: 7:43

Lucas Clark, PDS Long Range Planner I, provided a presentation about the proposed code change for PLN2024-00004: Lummi Height review. Lummi Island has its own zoning designation which is Rural Residential Island or RRI. The proposed code changes would be to add an extra foot of building height when within 100ft of the shoreline or up to 25ft maximum. Outside of the 100 ft shoreline area, it would allow buildings up to 30ft and then rural maximum building height would also be moved up to 30ft, which is similar to Eliza Island and some other areas of the county. In addition, the proposed code would add one foot of setback per foot of height in excess of 25ft. This would add a fire flow requirement to respond to the language in the Subarea plan about fire insurance ratings.

Commissioner Jefferson asked if this code change would matter if the property was within the flood zone.

Mr. Clark stated that the flood zone would not make a difference to the total height except in very tiny specific circumstances.

b) Public Hearing and Work Session Regarding Lummi Height

Timestamp: 7:50

There was no public comment.

Commissioner Chair Barton asked about the firefighting capabilities on the island and if there would be limitations to it with the proposed height change.

Mr. Clark responded the fire district was notified about the potential height change and it has not been changed since 1979.

Timestamp: 8:00

7Commissioner Mocerì moved to approve the proposed code changes with the findings of fact

Commissioner Jackson seconded.

Commissioner Jefferson asked if there was any information from the fire districts regarding these proposed code changes and if the fire department has the capacity to take this new change on or if they are volunteers.

Mr. Clark responded that they are volunteers.

Commissioner Mocerì reiterated that because of the proposed 25ft height, the building would have to have fire flow or sprinkler system due to the fire districts limitations.

Roll Call Vote: Ayes- Hansen, Jackson, Jefferson, James, Mocerì, Van Dalen, Eisenberg, Barton

(Ayes- 8; Nays- 0; Abstain- 0). The motion carried.

Unfinished Business

Timestamp: 8:02



**RECORD OF PROCEEDINGS OF THE
WHATCOM COUNTY PLANNING COMMISSION
October 24, 2024**

Public Hearing and Work Session

5

1 Commissioner Chair Barton spoke on the attendance issue that was brought up at the
2 last meeting. He spoke on creating a document that reiterates the importance of the
3 Commission, along with guidelines of the Commission.

4 Commissioner Chair Barton requests that staff create a document that refers to the
5 importance of the Commission and how to conduct a meeting, make motions, and
6 have discussions.

7 Commissioner James stated that he agrees with having the document about the
8 Robert's Rules of Order.

9 **Adjournment**

10 **Timestamp: 8:07**

11 The meeting was adjourned at 8:10 p.m.

12 Minutes prepared by Aileen Kogut-Aguon.

13 WHATCOM COUNTY PLANNING COMMISSION ATTEST:

14 _____
15 Kelvin Barton, Chair

Aileen Kogut-Aguon, Secretary



WHATCOM COUNTY

WASHINGTON

Planning & Development Services

5280 Northwest Drive
Bellingham, WA 98226
PDS@co.whatcom.wa.us
360-778-5900

November 5, 2024

TO: The Whatcom County Planning Commission

FROM: Matt Aamot, Senior Planner

THROUGH: Mark Personius, Director

RE: 2025 Comp Plan Update – Preliminary Population and Employment Projections

The Washington State Growth Management Act (GMA) requires that certain counties, and the cities within those counties, engage in planning for future population and employment growth. GMA planning goals include encouraging development in urban areas with public facilities and services, reducing sprawl, planning for housing affordable to all economic segments of the population, economic development, conservation of agricultural and forest lands, and protecting the environment (RCW 36.70A.020).

The last Whatcom County Comprehensive Plan update was completed in 2016. The GMA requires Whatcom County to review and revise its Comprehensive Plan and development regulations by December 31, 2025 (RCW 36.70A.130). Additionally, the GMA requires review of urban growth areas (UGAs) under RCW 36.70A.130(3). The UGAs must have sufficient areas and densities to accommodate population, housing and employment growth projected for the new planning period (2023 - 2045). Therefore, Whatcom County has initiated a Comprehensive Plan and development regulations update. The Comprehensive Plan update and UGA review is being conducted in close coordination with the seven cities in Whatcom County.

The County and cities hired a consulting firm to develop initial population and employment growth projections. The [Whatcom County Comprehensive Plan Population and Employment: Growth Projections and Preliminary Allocations Technical Report](#) (Leland Consulting Group, May 22, 2024, hereinafter referred to as "Technical Report") includes preliminary low, middle, and high growth projections to UGAs and the area outside UGAs (Rural and Resource Lands). The Technical Report represents a starting point for public input and discussions by planning commissions and elected officials to develop policy based growth projections. Here are the steps in the process (and tentative schedule) for developing growth projections:

- The County Council Committee of the Whole reviewed growth allocations recommended by County Planning and Development Services for the Birch Bay UGA, Cherry Point UGA, Columbia Valley UGA, and Rural areas & Resource Lands outside UGAs (October 8, 22, and 29 2024).
- The cities developed recommended growth allocations for their respective UGAs (October 2024).
- The County Planning Commission holds a public hearing and issues recommendations on the proposed County and City growth allocations (November 2024).
- The County Councils and City Councils approve “non-binding multi-jurisdictional resolutions” for the growth allocations (December 2024 or January 2025).

These policy-based allocations may take into consideration factors such as goals of individual cities, County goals, public input, infrastructure, and land capacity. Ultimately, the County Council will adopt growth projections for the entire County, along with projections for UGAs and Rural & Resource Lands, in the Comprehensive Plan update by December 2025. The County has a considerable amount of discretion in developing the growth projections, but they must be within the range of growth alternatives (bookends) studied in the Environmental Impact Statement. Additionally, County and City comprehensive plans (including growth projections) must be coordinated and consistent under the GMA.

City and County Population and Employment Growth Proposals

Each City and the County developed population and employment growth proposals for the Comprehensive Plan update process. The tables below show the Technical Report growth projections and City & County population and employment growth proposals (shown in bold) for consideration by the Planning Commission on November 14. The Planning Commission will provide recommendations on the “City and County Proposals.” The Technical Report low, middle, and high projections are provided for context.

Preliminary growth proposal documents were developed by each City for their respective UGA and by the County for the Birch Bay UGA, Cherry Point UGA, Columbia Valley UGA and Rural & Resource Lands located outside UGAs. These preliminary growth proposal documents, which are in the Planning Commission’s packet, include more detail and rationale for the preliminary population and employment growth proposals below.

Table 1. Population Growth Proposals

Area	Tech Report Low	Tech Report Middle	Tech Report High	City & County Proposals	Percent of Total Growth
Bellingham UGA	16,242	24,158	36,462	30,310	44.8%
Birch Bay UGA	1,555	2,313	3,490	2,662	3.9%
Blaine UGA	1,865	2,774	4,186	3,500	5.2%
Cherry Point UGA	0	0	0	0	0.0%
Columbia Valley UGA	665	988	1,492	1,137	1.7%
Everson UGA	627	933	1,408	1,408	2.1%
Ferndale UGA	4,883	7,262	10,961	10,961	16.2%
Lynden UGA	4,481	6,665	10,060	6,665	9.9%
Nooksack UGA	237	352	531	995	1.5%
Sumas UGA	468	697	1,052	1,000	1.5%
Rural/Resource Lands (Outside UGAs)	7,243	10,773	16,260	9,000	13.3%
TOTAL	38,266	56,915	85,902	67,638	100.0%

The “Tech Report” is the *Whatcom County Comprehensive Plan Population and Employment: Growth Projections and Preliminary Allocations Technical Report* (Leland Consulting Group, May 22, 2024).

Table 2. Employment Growth Proposals

Area	Tech Report Low	Tech Report Middle	Tech Report High	City & County Proposals	% of Total Growth
Bellingham UGA	9,719	15,172	23,642	19,384	59.9%
Birch Bay UGA	80	124	194	450	1.4%
Blaine UGA	449	701	1,092	1,092	3.4%
Cherry Point UGA	316	493	769	1200	3.7%
Columbia Valley UGA	9	13	21	350	1.1%
Everson UGA	130	203	317	602	1.9%
Ferndale UGA	1,372	2,141	3,337	3,337	10.3%
Lynden UGA	1,152	1,799	2,803	1,799	5.6%
Nooksack UGA	51	79	124	232	0.7%
Sumas UGA	96	150	233	500	1.5%
Rural/Resource Lands (Outside UGAs)	2,180	3,403	5,302	3,403	10.5%
TOTAL	15,554	24,278	37,834	32,349	100.0%

The “Tech Report” is the *Whatcom County Comprehensive Plan Population and Employment: Growth Projections and Preliminary Allocations Technical Report* (Leland Consulting Group, May 22, 2024).

Population and employment projections are an important component of planning for growth in the 2025 Comprehensive Plan update process. There are currently two related but different processes occurring relating to future growth projections in the 2025 Comprehensive Plan update: (1) A Draft Environmental Impact Statement (EIS), and (2) A non-binding multi-jurisdictional resolution to select preliminary 20-year population and employment growth targets.

Draft EIS

The County is developing a Draft Environmental Impact Statement (EIS), with the assistance of a consultant, relating to the 2025 Comprehensive Plan update. The Draft EIS will study a range of growth alternatives to provide information to decision makers on the impacts of different land use scenarios. The Draft EIS will evaluate the following growth scenarios for the new planning period (2023-2045):

- A “no action” growth alternative - based on the existing Comp Plan;
- Action alternative 1 – based on the middle growth scenario from the Technical Report;
- Action Alternative 2 - based on the preliminary growth proposals from the cities and County; and
- Action Alternative 3 - based the high growth scenario from the Technical Report.

The population and employment projections for the EIS alternatives, as currently formulated, are set forth below. Note that the Whatcom County jurisdictional areas that are not associated with a City are highlighted in red.

	No Action (Current Comp Plan)			
	Population		Employment	
	Population	Share	Employment	Share
Bellingham City & UGA	17,676	44.6%	4,675	61.1%
Birch Bay UGA	3,007	7.6%	113	1.5%
Blaine City & UGA	2,513	6.3%	433	5.7%
Cherry Point UGA	0	0.0%	184	2.4%
Columbia Valley UGA	766	1.9%	74	1.0%
Everson City & UGA	707	1.8%	124	1.6%
Ferndale City & UGA	3,890	9.8%	826	10.8%
Lynden City & UGA	3,645	9.2%	445	5.8%
Nooksack City & UGA	564	1.4%	24	0.3%
Sumas City & UGA	498	1.3%	92	1.2%
Rural and Resource Lands	6,386	16.1%	661	8.6%
Total	39,650	100.0%	7,651	100.0%

	Alternative 1 (OFM / Technical Report Middle)			
	Population		Employment	
	Population	Share	Employment	Share
Bellingham City & UGA	24,158	42.4%	15,172	62.5%
Birch Bay UGA	2,313	4.1%	124	0.5%
Blaine City & UGA	2,774	4.9%	701	2.9%
Cherry Point UGA	0	0.0%	493	2.0%
Columbia Valley UGA	988	1.7%	13	0.1%
Everson City & UGA	933	1.6%	203	0.8%
Ferndale City & UGA	7,262	12.8%	2,141	8.8%
Lynden City & UGA	6,665	11.7%	1,799	7.4%
Nooksack City & UGA	352	0.6%	79	0.3%
Sumas City & UGA	697	1.2%	150	0.6%
Rural and Resource Lands	10,773	18.9%	3,403	14.0%
Total	56,915	100.0%	24,279	100.0%

	Alternative 2 (County/City Scenario)			
	Population		Employment	
	Population	Share	Employment	Share
Bellingham City & UGA	30,310	44.8%	19,384	59.9%
Birch Bay UGA	2,662	3.9%	450	1.4%
Blaine City & UGA	3,500	5.2%	1,092	3.4%
Cherry Point UGA	0	0.0%	1,200	3.7%
Columbia Valley UGA	1,137	1.7%	350	1.1%
Everson City & UGA	1,408	2.1%	602	1.9%
Ferndale City & UGA	10,961	16.2%	3,337	10.3%
Lynden City & UGA	6,665	9.9%	1,799	5.6%
Nooksack City & UGA	995	1.5%	232	0.7%
Sumas City & UGA	1,000	1.5%	500	1.5%
Rural and Resource Lands	9,000	13.3%	3,403	10.5%
Total	67,638	100.0%	32,349	100.0%

	Alternative 3 (Technical Report High)			
	Population		Employment	
	Population	Share	Employment	Share
Bellingham City & UGA	36,462	42.4%	23,642	62.5%
Birch Bay UGA	3,490	4.1%	194	0.5%
Blaine City & UGA	4,186	4.9%	1,092	2.9%
Cherry Point UGA	0	0.0%	769	2.0%
Columbia Valley UGA	1,492	1.7%	21	0.1%
Everson City & UGA	1,408	1.6%	317	0.8%
Ferndale City & UGA	10,961	12.8%	3,337	8.8%
Lynden City & UGA	10,060	11.7%	2,803	7.4%
Nooksack City & UGA	531	0.6%	124	0.3%
Sumas City & UGA	1,052	1.2%	233	0.6%
Rural and Resource Lands	16,260	18.9%	5,302	14.0%
Total	85,902	100.0%	37,834	100.0%

The County has broad discretion to select population and employment projections for the Comprehensive Plan update within the range of growth alternatives studied in the EIS.

Non-Binding Multi-Jurisdictional Resolution

After the Planning Commission holds a public hearing and issues recommendations on the population and employment growth projections, these projections will be considered by the County Council and the City Councils in the form of a “Non-Binding Multi-Jurisdictional Resolution.” A similar resolution was approved in the 2016 Comp Plan update process ([Resolution 2014-013](#)).

Final growth projections would ultimately be adopted in the Comprehensive Plan by the County Council (the State deadline for adopting the Comp Plan update is December 31, 2025).

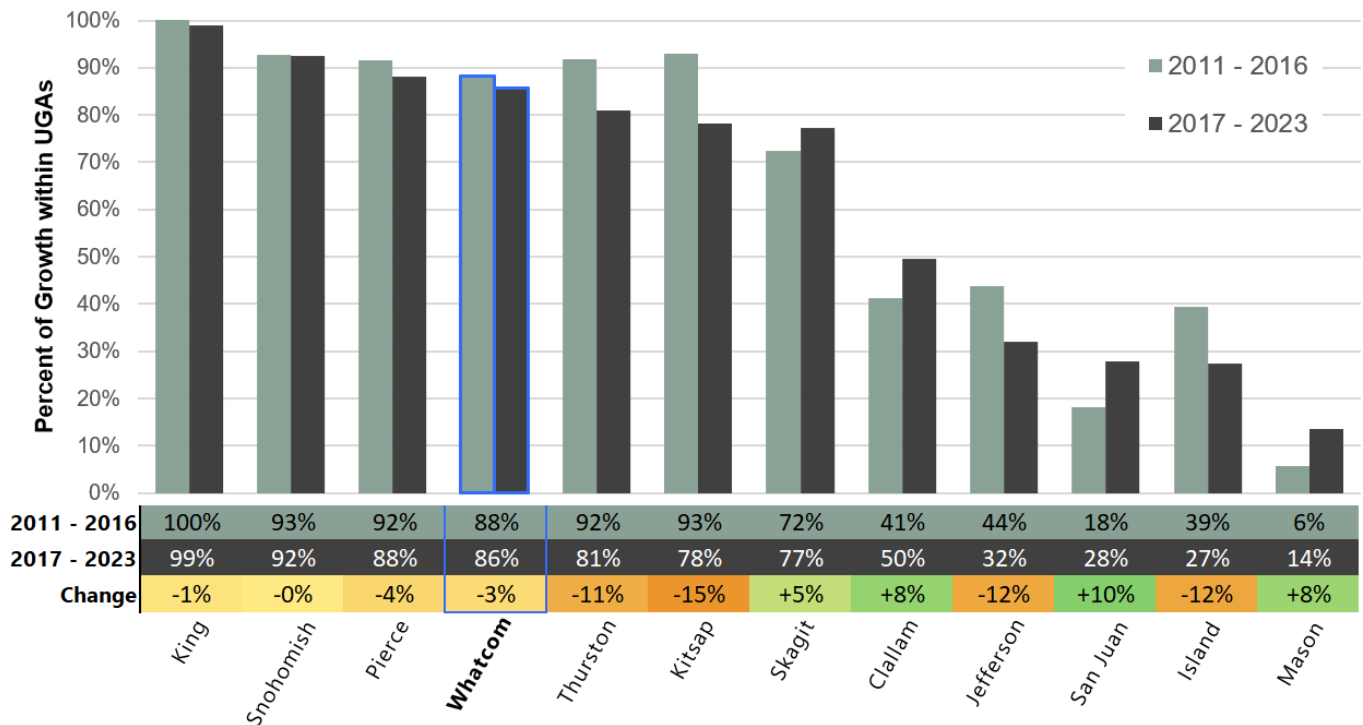
Whatcom County Comprehensive Plan / Rural Growth Projection

Staff would like to highlight a policy relating to the Rural and Resource Land growth projections. Comprehensive Plan [Chapter 2](#) includes Policy 2DD-1, which requires the County to:

. . . compare nonurban population growth trends with the adopted nonurban population growth projection. **If the trend over five years indicates that nonurban growth is significantly higher than adopted projections, the County shall take action to address the discrepancy.** Actions may include changing the allocation of the projected population growth during the comprehensive plan update required per RCW 36.70A.130(1), or changing development regulations to limit growth outside the urban growth areas. In addition, as the County and cities review the capacity for growth in the urban growth areas, the county should coordinate with the cities to ensure that policies are in place that are consistent with encouraging growth in the urban areas and reducing demand for development in rural areas (emphasis added).

[Chapter 1](#) of the current Whatcom County Comprehensive Plan (p. 1-7) allocates growth of 11,217 people or 16% of the future countywide population growth to areas outside UGAs (Rural and Resource Lands) and 84% to cities and UGAs. This equates to growth of about 488 people per year outside UGAs.

According to analysis by the State Office of Financial Management (OFM) and the Puget Sound Partnership shown in the table below, 86% of the countywide growth from 2017-2023 was accommodated in cities and UGAs and 14% outside UGAs since the current Comprehensive Plan targets were adopted in 2016.



Source: Puget Sound Partnership, Appendix: Tracking Urban Growth Across the Puget Sound: Findings for Whatcom County (2024)

The rate of population growth in the Rural areas and Resource Lands has steadily slowed over the last several decades, as shown below.

Population Growth in Rural and Resource Lands (1990-2020)

Year	Population	Growth for Decade	Average Annual Growth for Decade	Average Annual Growth Rate	Share of Countywide Growth for Decade
1990	45,321				
2000	56,775	11,454	1,145	2.3%	29.3%
2010	64,862	8,087	809	1.3%	23.6%
2020	69,821	4,959	496	0.7%	19.3%

Source: Population data from 1990 and 2000 is from the *Whatcom County Population and Employment Projections and Urban Growth Area Allocations Phase I Technical Report* (BERK, 2013, p. 9). Population data for 2010 and 2020 is derived from the State Office of Financial Management's Small Area Estimates Program.

According to the Technical Report, which used data from the State Office of Financial Management (OFM), areas outside UGAs experienced 18.9% of the countywide growth between 2013 and 2023 (p. 10) and, as previously indicated by OFM, the share of growth in rural and resource lands fell to 14% of countywide growth from 2017-2023.

As indicated, Planning and Development Services discussed the Rural and Resource Lands growth projections with the County Council in October. Planning and Development Services' initial proposal was population growth of 10,000 in Rural and Resource Lands over the new planning period (2023-2045). The County Council Committee of the Whole passed the following motion on October 22, 2024:

Have Planning and Development Services plan to shift some of those 10,000 [population] that are currently assigned for LAMIRDS and the rural area to other locations.

Based upon the motion passed, PDS suggested reducing the population growth projection for Rural and Resource Lands from 10,000 to no lower than 9,000 for the planning period (2023-2045) at the County Council's special meeting on October 29, 2024. This would equate to growth of 409 people per year in these areas. It would be below historic rural growth trends in these areas.

Based upon existing Policy 2DD-1, the County must take action if future Rural growth "significantly" exceeds the projection in the Comprehensive Plan. Potential actions may include:

1. Changing the allocation of the projected population growth during the comprehensive plan update required per RCW 36.70A.130(1);
2. Changing development regulations to limit growth outside the urban growth areas; and
3. The County and cities reviewing the capacity for growth in the urban growth areas, the county coordinating with the cities to ensure that policies are in place that are consistent with encouraging growth in the urban areas and reducing demand for development in rural areas.

There's always the option of simply changing the Rural allocations at a later date to reflect the growth that has already happened (# 1 above). However, under House Bill 1220 and related state guidance on planning for affordable housing across all household income levels, the Growth Management Act now requires a county-wide process to allocate housing at the various income bands to the UGAs and Rural areas. Changing the Rural allocation would modify how many housing units each city and UGA must accommodate at the various income bands. Therefore, any future change to the Rural allocation would involve discussion with the cities to ensure our respective comprehensive plans are coordinated and consistent.

Another action mentioned in Policy 2DD-1 is to change development regulations to limit growth in Rural areas (# 2 above). This could include downzoning. For example, the EIS will include mitigating measures to potentially downzone "[Rural Study Areas](#)" (lands zoned R5A or R10A that have agricultural significance), further restricting land division. Rezoning other areas could also be considered as well as instituting a moratorium on subdivisions outside of UGAs. It should be noted that downzoning to reduce land divisions in Rural areas would not prevent development on the many existing legal lots in these areas. If rural growth were to significantly exceed the final rural population projection targets adopted by the County Council, then slowing development on existing lots in Rural areas may require additional measures such as capping or rationing the number of building permits that can be issued each year or instituting moratoriums on the issuance of residential building

permits outside of UGAs. Any such proposed measure brings risk and would require close consultation with the County's legal counsel. Budget implications of reduced permit fee revenue should also be considered.

The final action mentioned is working with the cities to encourage growth in UGAs (# 3 above). Local governments can do a number of things to encourage growth in urban areas such as provide adequate land supply through zoning, plan and construct infrastructure to support development, and facilitate annexation of land in UGAs. At the current time, all seven cities have policies that generally do not allow extension of public water and sewer outside City limits prior to annexation. There is concern that when a city extends public water and sewer for development in the UGA (outside city limits) it may reduce the incentive for property owners in these areas to petition for annexation at a later date. However, the State Legislature has amended annexation statutes over the last 15 years to allow alternative annexation methods such as when the city, county, and fire district enter into an interlocal agreement for annexation (a property owner petition is not required).

Whatcom County Comprehensive Plan Policy 2DD-1 and the potential actions needed if Rural growth exceeded the adopted population projection was addressed in a Planning and Development Services memo to the County Council dated October 25, 2024 and discussed with Council. County Council members did not express any objections to moving forward with a population growth projection of 9,000 for Rural and Resource Lands at their October 29, 2024 meeting.

Summary

The Planning Commission will hold a public hearing on the preliminary population and employment growth projections from the cities and the County on November 14, 2024 and make recommendations to the County Council. These growth projections would then come before the County Council in the form of a draft non-binding multi-jurisdictional resolution.

Thank you for your consideration of this matter. We look forward to discussing it with you.

Urban Growth Area Review

City of Bellingham

Preliminary

UGA Growth Allocation Proposal

2025 to 2045 Planning Period

October 31, 2024

I. Introduction

The Washington State Growth Management Act (GMA) requires certain counties, and the cities within those counties, to engage in regular planning for future population, housing and employment growth. The last Whatcom County Comprehensive Plan update was completed in 2016. The GMA requires Whatcom County to review and revise its Comprehensive Plan and development regulations by December 31, 2025 (RCW 36.70A.130).

Growth Management Act (GMA) planning goal 11 requires coordination between jurisdictions in the 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). The GMA was amended by House Bill 1220, adopted by the State Legislature in 2021. These amendments require the County and the Cities to plan for existing and projected housing needs, including needs of low and moderate income households (RCW 36.70A.070(2)). Therefore, Whatcom County and the cities are undertaking a joint planning process to allocate population, housing and employment growth in association with the comprehensive plan updates.

The population and employment growth projection process is being undertaken in several phases.

Phase I - As an initial step in this process, the County and Cities jointly funded a report entitled Whatcom County Comprehensive Plan Population and Employment: Growth Projections and Preliminary Allocation Technical Report (Leland Consulting Group, May 22, 2024, hereinafter referred to as “Technical Report”). This report shows how future population and employment growth would be allocated to UGAs if based primarily on historical growth shares.

Phase II – The County and Cities consider GMA requirements, local government goals and policies, public input, infrastructure availability, land capacity, past trends and other factors when planning for future population and employment growth. Existing interlocal agreements indicate that the County and Cities will work together to develop proposed population and employment projections. Therefore, each City is developing preliminary population and employment projections for their respective UGA. The County is proposing preliminary projections for the Birch Bay UGA, Columbia Valley UGA, Cherry Point UGA and Rural & Resource Lands (outside UGAs). The County Planning Commission will hold a public hearing on November 14 and issue recommendations to the County Council on the County and City preliminary growth proposals.

The County Council will consider a non-binding multi-jurisdictional resolution relating to the preliminary growth projections in late 2024 or early 2025 (similar to non-binding Resolution 2014-013 approved in the last Comp Plan update process). The preliminary growth

projections in the non-binding multi-jurisdictional resolution would provide a common starting point for developing draft land use planning proposals and draft capital facility plans. Final growth projections would be adopted in the 2025 Comprehensive Plan update.

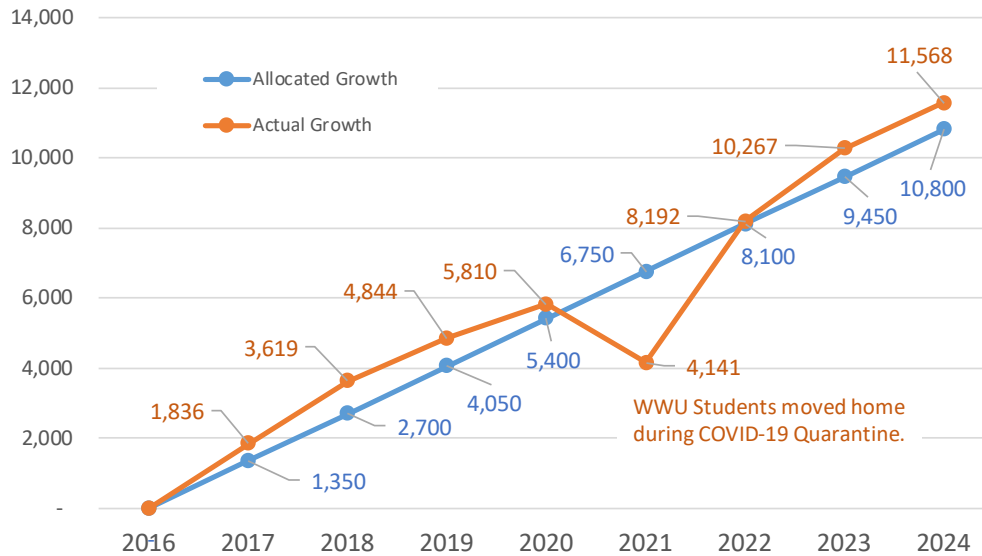
II. City Profile

At about 107,000 people and 70,000 jobs the Bellingham UGA accommodates nearly half of Whatcom County's population and about 60% of employment. The city is home to Western Washington University, Whatcom Community College, Bellingham Technical College, and the PeaceHealth/Saint Joseph's regional healthcare campus. With a spectacular natural setting, the community includes over 12 miles of Bellingham Bay shoreline; backs up to the forested Cascade foothills and is conveniently accessible to the Seattle and Vancouver BC metro areas. The city is also home to a working waterfront marine trades area, and Bellingham International Airport.

For the past 20 years Bellingham has emphasized a growth strategy of compact, well-designed infill development supported by multi-modal transportation, utility, park, and trail infrastructure. A cornerstone of this approach has been the establishment of seven urban village subareas. These mixed-use districts have accommodated about 1/3 of all new housing and a large share of the businesses and jobs in Bellingham.

The 2016 Comprehensive Plan anticipated the Bellingham UGA would grow at an average of about 1,350 people per year. In the eight years since adoption of the 2016 plan the UGA has grown by 11,568 people for an average of about 1,446 people per year, or 7% more than anticipated.

Bellingham UGA Allocated & Actual Population Growth



Sources - Whatcom County 2016 Comprehensive Plan & Washington State Office of Financial Management

III. Preliminary UGA Growth Allocation Proposal

This section of the report compares the Phase I Technical Report medium UGA growth allocation (Leland Consulting Group, May 7, 2024), which is based primarily upon historical population and employment shares, to the preliminary City proposal for growth allocations to the UGA

UGA Population Allocation Proposal (2023-2045)		
1	Phase I – Technical Report Medium Growth Allocation (people)	24,158
2	Phase I – Technical Report Adjusted High Growth Allocation (people)	36,462
3	Phase II – Preliminary City Proposal (people)	30,310
4	Difference between 1 and 3	6,152
5	Comments: The City of Bellingham Planning Commission and City Council Planning Committee recommend use of a population allocation mid-way between the Technical Report Medium (OFM) and Adjusted High growth projection as the starting point for the update to the City's Comprehensive Plan.	

1. The City's proposal is consistent with past trends. Over the past 10 years (2014 to 2024) the Bellingham UGA has averaged annual growth of 1,346 people per year which is 98% of the Preliminary City Proposal.
2. The WA State OFM Medium population projection for all of Whatcom County has historically proven to be very close to actual achieved growth. The 2012 OFM Medium Whatcom County growth projection anticipated growth 2016 to 2036 of 3,030 people per year. The actual 2014-2024 average growth of 3,006 people per year is 99% of that projected rate. As described in the Technical Report, OFM expects future in-migration to remain steady for our region but projects a continuing decline in the birth rate due to the aging Boomer population. Correspondingly, the recently updated OFM Medium projection for Whatcom County anticipates growth 2025 to 2045 will average 2,620 people per year (down from the previous projection of 3,030 people per year). As a result, the historic share method of projecting Bellingham's future population growth would result in a future growth rate of about 1,100 people per year which is nearly 20% lower than that experienced in the past 10 years.
3. Bellingham will continue to be a desirable place to live. We are not willing at this point to accept the assumption that future growth here will be less than in the past. We believe it is more responsible to plan for a higher growth rate than to plan for a lower rate that might not occur.
4. Since 2006 Bellingham has adopted urban six urban village plans and is currently working on a plan for the Barkley Urban Village. In 2009 we adopted a middle housing development code called the Infill Toolkit (ITK). And in 2018 revisions to the subdivision code expanded the ITK to many single-family residential zones. In 2021 the City revised and simplified its multi-family zoning code and implemented minimum density requirements. And 2023 revisions to the Accessory Dwelling Unit regulations brought Bellingham's code in alignment with WA State House Bill 1337. All of these actions have added capacity for thousands of new homes in areas where additional development was not previously allowed.
5. Bellingham also continues to invest heavily in infrastructure. Since the UGA was established in 1995, the City has approved 22 annexations (averaging one annexation every 1-2 years). These areas total over 3,300 acres and today accommodate more than 4,350 homes, about 9,000 residents, and 8,000 jobs. To-date, we have invested more than \$150 million dollars in transportation, utilities, parks, and trail infrastructure, and expansion of public safety and other urban services to these areas.
6. The City agrees with the Growth Management Act that urban growth areas are the appropriate location for the majority of growth. We support the County's consideration

of a lower growth allocation to the rural areas outside UGAs and the County and the other cities efforts to direct growth to UGAs. This lower rural allocation is in alignment with Bellingham’s climate action goals as it will reduce vehicle trips into Bellingham for employment and access to goods and services. This will also help mitigate the need for continued expansion of transportation infrastructure leading into Bellingham.

UGA Employment Allocation Proposal (2023-2045)		
1	Phase I – Technical Report Medium Growth Allocation (jobs)	15,172
2	Phase I – Technical Report Adjusted High Growth Allocation (jobs)	23,642
3	Phase II – Preliminary City Proposal (jobs)	19,384
4	Difference between 1 and 3	4,212
5	Comments: The City of Bellingham Planning Commission and City Council Planning Committee recommend use of an employment allocation mid-way between the Technical Report Medium (OFM) and Adjusted High growth projection as the starting point for the update to the City's Comprehensive Plan.	

1. The City’s proposal acknowledges Bellingham’s current 63% share of countywide employment and a larger future share. This proposal aligns with our climate action goals to reduce vehicle trips, and provides increased opportunity for cost-burdened households to close the income-housing cost gap.
2. Bellingham supports economic development through continued investment in infrastructure and urban services in urban villages, commercial, industrial, and institutional zones.
3. The City strives to provide excellent services to businesses and the workforce through efficient, predictable, and fair permitting and regulatory procedures, and a high level of service for public safety, transportation, utility, parks and recreation, library, museum, and other urban services.
4. The City participates in and supports the regional Comprehensive Economic Development Strategy (CEDS) along with Whatcom County, the Port of Bellingham, Team Whatcom, and the other cities.

IV. Preliminary 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. Preliminary land capacity analysis results for the Phase II City Proposal, based upon existing UGA boundaries, are shown below. A surplus or deficit will be considered by the city when evaluating potential UGA boundary changes.

Preliminary Residential Land Capacity Analysis (2023-2045)		
1	Estimated Population Growth Capacity of existing UGA (people)	25,270
2	Population Growth Allocation Proposed (people)	30,310
3	Estimated Housing Growth Capacity of existing UGA (housing units)	14,370
4	Housing Growth Allocation Proposed (housing units)	18,443
5	Difference between 1 and 2 (people)	(5,040)
6	Difference between 3 and 4 (housing units)	(4,073)
7	<p>Comments: Note that the land capacity numbers are preliminary. These estimates are based on existing zoning regulations. They do account for 2023 ADU amendments (HB 1337).</p> <p>It may also be appropriate to revise factors used to model the impacts of landmark tree protection, critical areas and buffers, infrastructure gaps, market factors, or anticipated production rates for infill housing, ADUs, and other housing types.</p> <p>There are additional required and discretionary actions that the city could take to increase housing and population capacity. Required actions include code revisions related to HB 1110 (middle housing), HB 1998 (co-living housing), and HB 1293 (streamlining design review process). Discretionary actions include consideration of increased development capacity along high-frequency transit routes (Transit Oriented Development or TOD corridors), implementing minimum density requirements in all residential zones, and expansion of the UGA boundary. The potential impacts and costs associated with these options will be evaluated in the update to the comprehensive plan.</p>	

Preliminary Employment Land Capacity Analysis (2023-2045)		
1	Estimated Employment Growth Capacity of existing UGA (jobs)	19,360
2	Employment Growth Allocation Proposed (jobs)	19,384
3	Difference between 1 and 2 (jobs)	(24)
4	<p>Comments: Note that the land capacity numbers are preliminary. These estimates are based on existing zoning regulations.</p> <p>It may also be appropriate to revise factors used to model the impacts of landmark tree protection, critical areas and buffers, infrastructure gaps, market factors, or changes in market conditions related to specific industry sectors.</p> <p>There are additional discretionary actions that the city could take to increase employment capacity. These include consideration of increased development capacity along high-frequency transit routes (Transit Oriented Development or TOD</p>	

	corridors), allowing small-scale commercial services in all residential zones, and expansion of the UGA boundary. The potential impacts and costs associated with these options will be evaluated in the update to the comprehensive plan.
--	--

2025 Comp Plan Update Urban Growth Area (UGA) Review

Birch Bay UGA Preliminary Growth Proposal

October 31, 2024

I. Introduction

The Washington State Growth Management Act (GMA) requires certain counties, and the cities within those counties, to engage in regular planning for future population, housing and employment growth. The last Whatcom County Comprehensive Plan update was completed in 2016. The GMA requires Whatcom County to review and revise its Comprehensive Plan and development regulations by December 31, 2025 (RCW 36.70A.130).

Growth Management Act (GMA) planning goal 11 requires coordination between jurisdictions in the 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). The GMA was amended by House Bill 1220, adopted by the State Legislature in 2021. These amendments require the County and the Cities to plan for existing and projected housing needs, including needs of low and moderate income households (RCW 36.70A.070(2)). Therefore, Whatcom County and the cities are undertaking a joint planning process to allocate population, housing and employment growth in association with the comprehensive plan updates.

The population and employment growth projection process is being undertaken in several phases.

Phase I - As an initial step in this process, the County and Cities jointly funded a report entitled *Whatcom County Comprehensive Plan Population and Employment: Growth Projections and Preliminary Allocation* [*Technical Report*](#) (Leland Consulting Group, May 22, 2024, hereinafter referred to as "Technical Report"). This report shows how future population and employment growth would be allocated to UGAs if based primarily on historical growth shares.

Phase II – The County and Cities consider GMA requirements, local government goals and policies, public input, infrastructure availability, land capacity, past trends and other factors when planning for future population and employment growth. Existing interlocal agreements indicate that the County and Cities will work together to develop proposed population and employment projections. Therefore, each City is developing preliminary population and employment projections for their respective UGA. The County is proposing preliminary projections for the Birch Bay UGA, Columbia Valley UGA, Cherry Point UGA and Rural & Resource Lands (outside UGAs). The County Planning Commission will hold a public hearing on November 14 and issue recommendations to the County Council on the County and City preliminary growth proposals.

The County Council will consider a non-binding multi-jurisdictional resolution relating to the preliminary growth projections in late 2024 or early 2025 (similar to non-binding [*Resolution 2014-013*](#) approved in the last Comp Plan update process). The preliminary growth projections in the non-binding multi-jurisdictional resolution would provide a common starting point for developing draft land use planning

proposals and draft capital facility plans. Final growth projections would be adopted in the 2025 Comprehensive Plan update.

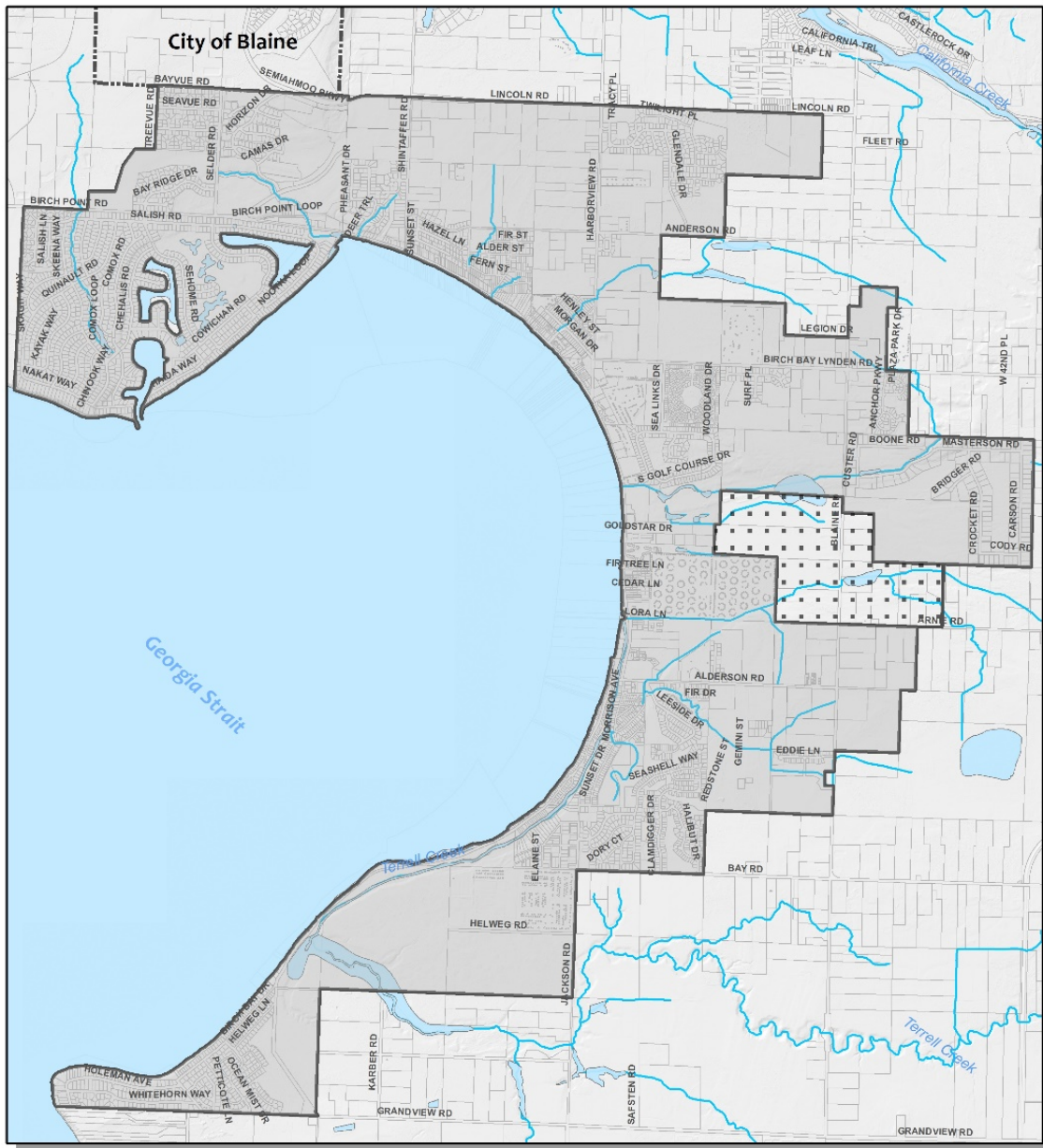
II. UGA Profile

The Birch Bay UGA is located in northwestern Whatcom County between the Blaine UGA and the Cherry Point UGA. The Birch Bay area has historically developed with seasonal homes, resort/recreational uses and businesses. The area has grown rapidly over the last two decades and has seen more full-time residents, some of which are retiring to the area.

Whatcom County designated Birch Bay as an Urban Growth Area (UGA) in 1997. The Birch Point area and land south of Point Whitehorn were removed from the UGA when the Birch Bay Community Plan was adopted in 2004. The Birch Bay UGA was reduced further in the 2009 UGA review, when lands in the eastern part of the UGA were removed. The UGA boundaries were not changed in the 2016 Comprehensive Plan update. The approximate acreages of current zoning classifications in the UGA are as follows:

Resort Commercial (RC):	340
General Commercial (GC):	186
Neighborhood Commercial (NC):	21
Urban Residential four units/acre (UR4):	1,775
Urban Residential Medium Density six units/acre (URM6)	1,184
Urban Residential Medium Density 24 units/acre (URM24)	<u>100</u>
Total:	3,606

The boundaries of the Birch Bay UGA and UGA Reserve (which could be considered for UGA status in the future) are shown below.



- Birch Bay Urban Growth Area

- Urban Growth Area
- Urban Growth Area Reserve

USE OF WHATCOM COUNTY'S GIS DATA IMPLIES THE USER'S AGREEMENT WITH THE FOLLOWING STATEMENT:
 Whatcom County disclaims any warranty or responsibility or warranty of fitness of this map for any particular purpose, either express or implied. No representation or warranty is made concerning the accuracy, currency, completeness or quality of data depicted on this map. Any user of this map assumes all responsibility for use thereof, and further agrees to hold Whatcom County harmless from and against any damages, loss, or liability arising from any use of this map.

0 0.075 0.15 0.3 0.45 0.6 Miles



The Birch Bay UGA is approximately 5.6 square miles (3,606 acres) and has an estimated 2023 population of 8,908 (Technical Report, p. 10). The UGA contains a variety of residential, resort, recreational and commercial land uses. These land uses include year round homes, vacation rentals, RV parks, mobile home parks, condominiums, restaurants, shops that cater to the seasonal population, and a state park. The Birch Bay area has more than doubled in population over the last two decades. The population within the current UGA boundaries for Census years, population growth, and the average annual growth rates in previous decades are shown below:

Population Growth in the Birch Bay UGA (1990-2020)

Year	Population	Growth for Decade	Average Annual Growth for Decade	Average Annual Growth Rate	Share of Countywide Growth for Decade
1990	2,141				
2000	4,163	2,022	202	6.9%	5.2%
2010	7,379	3,216	322	5.9%	9.4%
2020	8,685	1,306	131	1.6%	5.1%

Source: Population data from 1990 and 2000 is from the *Whatcom County Population and Employment Projections and Urban Growth Area Allocations Phase I Technical Report* (BERK, 2013). Population data for 2010 and 2020 from the State Office of Financial Management's Small Area Estimates Program.

The Birch Bay area provides aesthetic, recreational and environmental attributes that contribute to a high quality of life. It is attractive for year-round housing, homes for retirees, vacation homes and resort/recreational development. Additionally, public water and sewer are generally available to serve development in the UGA.

III. Preliminary UGA Growth Proposal

This section of the report compares the Technical Report middle population and employment growth projections for the Birch Bay UGA, which are based primarily upon historical population and employment shares, to the preliminary County proposal for growth in the UGA.

<i>UGA Population Growth Proposal (2023-2045)</i>		
1	Phase I - Technical Report Middle Growth Projection	2,313
2	Phase II - Preliminary County Proposal	2,662
3	Difference	349
4	<p>Comments:</p> <p>Population growth in the Birch Bay UGA has fluctuated over the last several decades, as shown in the table on p. 4. Overall, adequate land supply, availability of public water & sewer and the attractiveness of the area have led to a growing Birch Bay community that has more than doubled in population from 4,163 in 2000 to 8,685 in 2020.</p> <p>The Technical Report middle population growth scenario, which is based upon the share of countywide growth the UGA received from 2013 to 2023, would equate to an additional 105 people per year in the Birch Bay UGA from 2023-2045. This is lower than growth experienced in the last three decades. The proposed population projection extrapolates the annual average population growth in the UGA between 2013 and 2023 to the new planning period (2023-2045). The proposed growth projection of 2,662 would equate to 121 people/year through 2045.</p>	

<i>UGA Employment Growth Proposal (2023-2045)</i>		
1	Phase I - Technical Report Middle Growth Projection	124
2	Phase II - Preliminary County Proposal	450
3	Difference	326
4	<p>Comments:</p> <p>The Technical Report middle employment growth scenario is based upon the share of employment that each UGA had in 2021. Although the Birch Bay UGA had 3.8% of the county-wide population in 2023, it only had 0.5% of the county-wide jobs (2021).</p> <p>Whatcom County Comprehensive Plan Policy 7K-6 is to "Support long-term employment efforts in the unincorporated areas of the county, such as those stated in the Point Roberts, Birch Bay and east County Economic Development Plans and Sub-Area Plans." The Birch Bay Community Plan states:</p> <p style="padding-left: 40px;">. . . Purchasing power of the Birch Bay Community is significant and most of its consumer dollars are expended outside the Birch Bay area. To capture the consumer dollar, the Birch Bay Community needs commercial areas for retail and services of significant size to attract competitive retail and service outlets. The proposed community plan identifies such commercial areas at Blaine Road and Alderson Road, Blaine Road and Birch Bay-Lynden Road and again at Lincoln Road and Shintaffer Road. . . " (p. 2-24).</p> <p>The Community Plan's Vision Statement indicates, in part, that Birch Bay will be ". . . a place where scenic beauty is harmonized with urban development and job creating activities. . ." (p. 5-5).</p> <p>If the Technical Report middle growth projection of 124 new jobs (2023-2045) was adopted along with the proposed population projection, the Birch Bay UGA would add about 1 job for every 21 new residents over the planning period. Such an projection would also be substantially lower than the 545 jobs allocated to the Birch Bay UGA in the current Whatcom County Comprehensive Plan.</p> <p>In order to support opportunities for businesses to locate in the Birch Bay UGA and potential employment opportunities, the initial proposal is for an employment projection of 450 jobs over the new planning period from 2023 to 2045.</p>	

IV. Land Capacity Analysis Overview

The preliminary land capacity analysis indicates the existing Birch Bay UGA can accommodate the proposed population growth projections with potential changes to the Zoning Code that would allow middle housing (duplex, triplex, and fourplex development) in the Urban Residential zone to satisfy the requirements of House Bill 1220. The preliminary land capacity analysis indicates the existing Birch Bay UGA can accommodate the proposed employment growth.

V. Summary

In summary, Whatcom County Planning and Development Services recommends a preliminary population growth projection of 2,662 and an employment growth projection of 450 jobs for the Birch Bay UGA over the new planning period (2023-2045).

We are requesting the Planning Commission to hold a public hearing and make recommendations to the County Council on these preliminary growth projections. It's anticipated that the County Council will consider a non-binding multi-jurisdictional resolution relating to the preliminary growth projections in late 2024 or early 2025.

Thank you for your consideration of this matter. We look forward to discussing it with you.

2025 Comp Plan Update Urban Growth Area (UGA) Review

**City of Blaine UGA
Preliminary Growth Proposal**

November 4, 2024

I. Introduction

The Washington State Growth Management Act (GMA) requires certain counties, and the cities within those counties, to engage in regular planning for future population, housing and employment growth. The last Whatcom County Comprehensive Plan update was completed in 2016. The GMA requires Whatcom County to review and revise its Comprehensive Plan and development regulations by December 31, 2025 (RCW 36.70A.130).

Growth Management Act (GMA) planning goal 11 requires coordination between jurisdictions in the 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). The GMA was amended by House Bill 1220, adopted by the State Legislature in 2021. These amendments require the County and the Cities to plan for existing and projected housing needs, including needs of low and moderate income households (RCW 36.70A.070(2)). Therefore, Whatcom County and the cities are undertaking a joint planning process to allocate population, housing and employment growth in association with the comprehensive plan updates.

The population and employment growth projection process is being undertaken in several phases.

Phase I - As an initial step in this process, the County and Cities jointly funded a report entitled *Whatcom County Comprehensive Plan Population and Employment: Growth Projections and Preliminary Allocation* [*Technical Report*](#) (Leland Consulting Group, May 22, 2024, hereinafter referred to as "Technical Report"). This report shows how future population and employment growth would be allocated to UGAs if based primarily on historical growth shares.

Phase II – The County and Cities consider GMA requirements, local government goals and policies, public input, infrastructure availability, land capacity, past trends and other factors when planning for future population and employment growth. Existing interlocal agreements indicate that the County and Cities will work together to develop proposed population and employment projections. Therefore, each City is developing preliminary population and employment projections for their respective UGA. The County is proposing preliminary projections for the Birch Bay UGA, Columbia Valley UGA, Cherry Point UGA and Rural & Resource Lands (outside UGAs). The County Planning Commission will hold a public hearing on November 14 and issue recommendations to the County Council on the County and City preliminary growth proposals.

The County Council will consider a non-binding multi-jurisdictional resolution relating to the preliminary growth projections in late 2024 or early 2025 (similar to non-binding [*Resolution 2014-013*](#) approved in the last Comp Plan update process). The preliminary growth projections in the non-binding multi-jurisdictional resolution would provide a common starting point for developing draft land use planning

proposals and draft capital facility plans. Final growth projections would be adopted in the 2025 Comprehensive Plan update.

II. UGA Profile

The City of Blaine is located at the northwest corner of Whatcom County, bounded to the north by Canada and to the west by Semiahmoo Bay. The City of Blaine was born in industry; prominent for its fishing fleets, canneries and mills. More than a century later, Blaine continues to be a leader in commerce with pioneering companies responding to the opportunities of an international market.

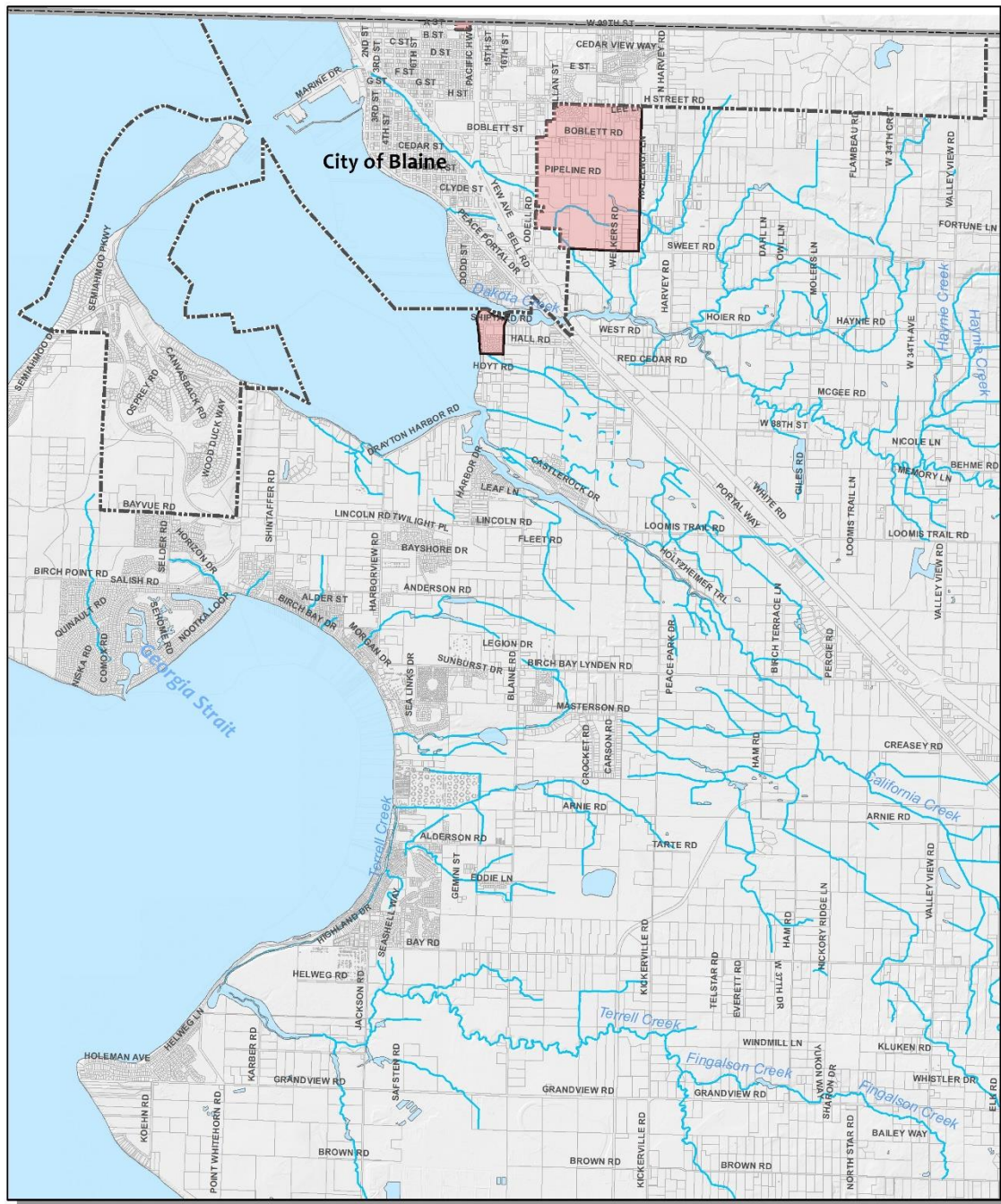
The City of Blaine is many things. It is a quaint seaside community. It is a resort destination. It is a recreational and second-home community. It is the busiest US/ Canada border crossing west of Detroit, Michigan, making it a focal point for international trade. Blaine strives to be a complete community with living-wage jobs, with shops and services, with a range of housing options and a vibrant downtown.

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

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. Blaine supports the more recent 10-year share-of-growth figure as the most appropriate numerical factor for apportioning the forecasted County-level growth.

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

The boundaries of the Blaine UGA are shown below.



- Blaine Urban Growth Area

Urban Growth Area

USE OF WHATCOM COUNTY'S GIS DATA IMPLIES THE USER'S AGREEMENT WITH THE FOLLOWING STATEMENT:
 Whatcom County disclaims any warranty of merchantability or warranty of fitness of this map for any particular purpose, either express or implied. No representation or warranty is made concerning the accuracy, currency, completeness or quality of data disclosed on this map. Any user of this map assumes all responsibility for use thereof, and further agrees to hold Whatcom County harmless from and against any damages, losses, or liabilities arising from any use of this map.

0 0.25 0.5 1 Miles



III. Preliminary UGA Growth Proposal

This section of the report compares the Technical Report middle population and employment growth projections for the Blaine UGA, which are based primarily upon historical population and employment shares, to the preliminary City plan for growth in the UGA.

<i>UGA Population Growth Proposal (2023-2045)</i>		
1	Phase I - Technical Report Middle Growth Projection	2,774
2	Phase II - Preliminary City Proposal (Medium-High)	3,500
3	Difference	726
4	<p>Comments:</p> <p>The City of Blaine is well-poised 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 being developed, with plans for hundreds of new housing starts.</p> <p>In 2010, the city built the Lighthouse Point Water Reclamation Facility (LPWRF), a state-of-the-art sewer treatment plant. The 23,000 Sq. Ft. complex in Marine Park was designed to minimize noise, odor, and view obstructions by housing most of the treatment systems underground. It can treat up to 3.1 million gallons per day of domestic sewage. Blaine is ready to handle population growth in an environmentally friendly, sustainable manner for years to come.</p> <p>Waterfront communities remain highly desirable, and as telecommuting becomes common practice, Blaine is a great 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 is considering height increases in the Central Business District to accommodate additional housing.</p> <p>Finally, Blaine already has the capacity for significant in-fill development and is committed to creating even more options for workforce housing, affordable housing, and low-income housing to support jobs in and around our community.</p>	

<i>UGA Employment Growth Proposal (2023-2045)</i>		
1	Phase I - Technical Report Middle Growth Projection	701
2	Phase II - Preliminary City Proposal (High)	1,092
3	Difference	391
4	<p>Comments:</p> <p>The City of Blaine has prioritized economic development as one of its highest priorities. The City has engaged in a Strategic Economic Initiative (SEI) to develop an action plan for improving economic development prospects in Blaine. A number of actions have been initiated that are designed to make the city more competitive and attractive.</p> <p>The City has recently been proactive in setting the stage for industrial development, including signing as a co-applicant for a 50-acre general binding site plan. This project alone will significantly impact Blaine's industrial land supply as a small city, and Blaine will need to look east of Odell Road to the UGA for additional supply. Blaine should coordinate with Whatcom County to ensure our UGA is protected for future uses as planned by the city.</p> <p>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 industries 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.</p>	

IV. Land Capacity Analysis Overview

The preliminary land capacity analysis indicates the existing City of Blaine UGA can easily accommodate the proposed population and employment growth projections. In fact, Blaine has an ample surplus of land for both single-family and multi-family housing, as well as industrial/manufacturing land. With modest zoning changes, Blaine should be able to accommodate the housing types necessary to satisfy the requirements of House Bill 1220.

Please be advised that Blaine City Council is exploring a "UGA Swap" alternative as part of our Comprehensive Plan update. This would entail realigning the city's growth away from critical natural resources in East Blaine and towards lands best suited for development in West Blaine. More information will be made available as part of a future phase of city-county coordination.

V. Summary

In summary, the City of Blaine City Council has adopted a medium-high population growth projection of 3,500 and a high employment growth projection of 1,092 jobs for the Blaine UGA over the new planning period (2023-2045). This was approved October 28, 2024 by a 5-1 City Council vote on Resolution 1956-24.

City of Blaine planning staff will be available for the Whatcom County Planning Commission to discuss these preliminary growth recommendations.

Thank you for your consideration of this matter. We look forward to discussing it with you.

2025 Comp Plan Update Urban Growth Area (UGA) Review

Cherry Point UGA Preliminary Growth Proposal

October 31, 2024

I. Introduction

The Washington State Growth Management Act (GMA) requires certain counties, and the cities within those counties, to engage in regular planning for future population, housing and employment growth. The last Whatcom County Comprehensive Plan update was completed in 2016. The GMA requires Whatcom County to review and revise its Comprehensive Plan and development regulations by December 31, 2025 (RCW 36.70A.130).

Growth Management Act (GMA) planning goal 11 requires coordination between jurisdictions in the 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). The GMA was amended by House Bill 1220, adopted by the State Legislature in 2021. These amendments require the County and the Cities to plan for existing and projected housing needs, including needs of low and moderate income households (RCW 36.70A.070(2)). Therefore, Whatcom County and the cities are undertaking a joint planning process to allocate population, housing and employment growth in association with the comprehensive plan updates.

The population and employment growth projection process is being undertaken in several phases.

Phase I - As an initial step in this process, the County and Cities jointly funded a report entitled *Whatcom County Comprehensive Plan Population and Employment: Growth Projections and Preliminary Allocation* [*Technical Report*](#) (Leland Consulting Group, May 22, 2024, hereinafter referred to as "Technical Report"). This report shows how future population and employment growth would be allocated to UGAs if based primarily on historical growth shares.

Phase II – The County and Cities consider GMA requirements, local government goals and policies, public input, infrastructure availability, land capacity, past trends and other factors when planning for future population and employment growth. Existing interlocal agreements indicate that the County and Cities will work together to develop proposed population and employment projections. Therefore, each City is developing preliminary population and employment projections for their respective UGA. The County is proposing preliminary projections for the Birch Bay UGA, Columbia Valley UGA, Cherry Point UGA and Rural & Resource Lands (outside UGAs). The County Planning Commission will hold a public hearing on November 14 and issue recommendations to the County Council on the County and City preliminary growth proposals.

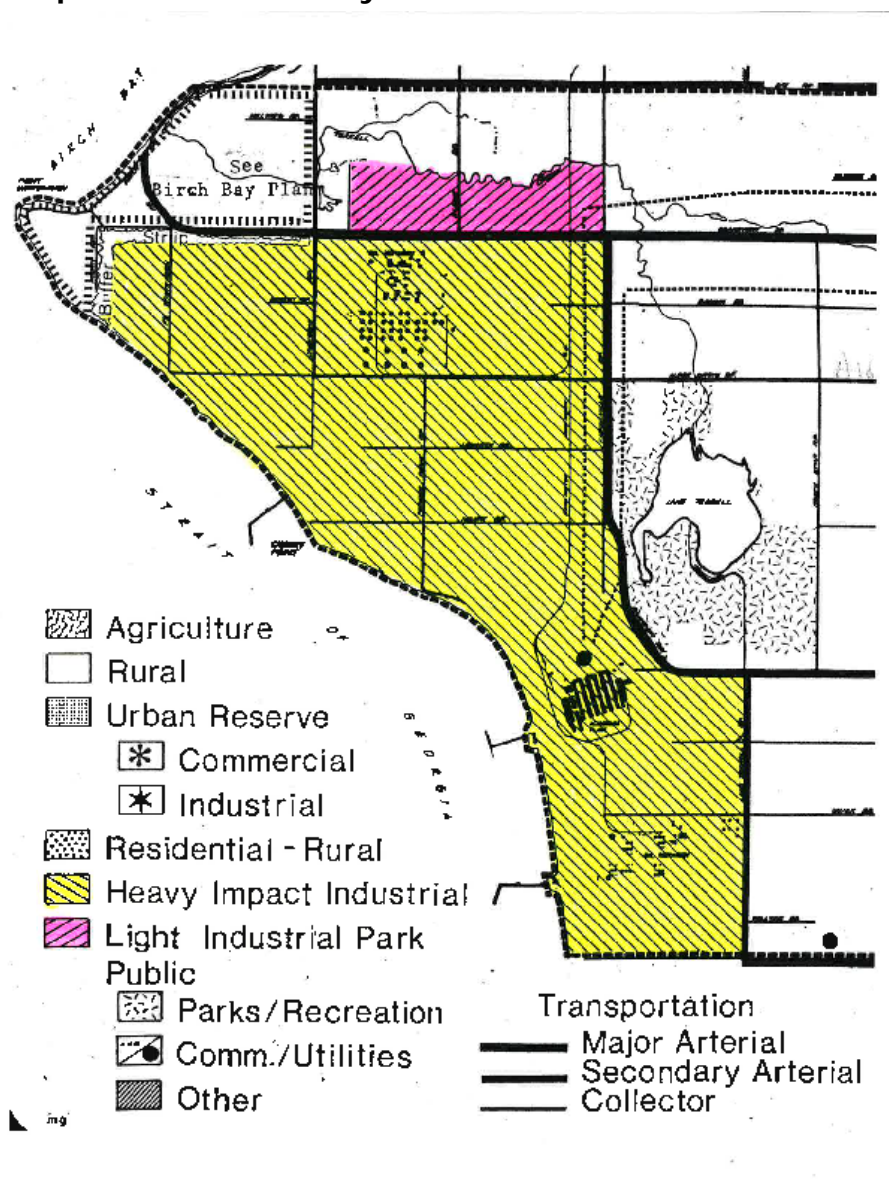
The County Council will consider a non-binding multi-jurisdictional resolution relating to the preliminary growth projections in late 2024 or early 2025 (similar to non-binding [*Resolution 2014-013*](#) approved in the last Comp Plan update process). The preliminary growth projections in the non-binding multi-jurisdictional resolution would provide a common starting point for developing draft land use planning

proposals and draft capital facility plans. Final growth projections would be adopted in the 2025 Comprehensive Plan update.

II. UGA Profile

The Cherry Point UGA is located in western Whatcom County, west of Ferndale, south of Birch Bay, and north of the Lummi Reservation. The Cherry Point area has historically been developed with heavy industrial uses, including two oil refineries and an aluminum smelter (which shutdown in 2020). The Cherry Point area was designated for industrial uses on the 1970 Comprehensive Plan map and the 1981 Cherry Point/Ferndale Subarea Plan.

Map from 1981 Cherry Point – Ferndale Subarea Plan



The GMA was enacted by the State legislature in 1990. Whatcom County designated Cherry Point as a UGA under the provisions of the GMA in 1997. The Cherry Point UGA boundaries did not change in the 2016 UGA review. The approximate acreages of current zoning classifications in the UGA are as follows:

Heavy Impact Industrial (HII):	6,565
Light Impact Industrial (LII):	<u>470</u>
Total:	7,035

The Cherry Point UGA is approximately 11 square miles. The Cherry Point area is a Major/Port Industrial UGA with zoning that generally does not allow residential development.

County-wide Planning Policy E-3 states:

Cherry Point shall be designated as an unincorporated industrial urban growth area in recognition of existing large scale industrial land uses. Additional large scale development shall be encouraged consistent with the ability to provide needed services and consistent with protecting critical areas along with other environmental protection considerations. The Cherry Point industrial area is an important and appropriate area for industry due to its access to deep water shipping, rail, all-weather roads, its location near the Canadian border, and its contribution to the County's goal of providing family wage jobs.

The Cherry Point area has long-standing industrial uses and land use designations. The industrial designation provides for buffering from surrounding land uses. The Cherry Point area has unique qualities that make it desirable for industrial development, but valuable marine habitat and cultural resources are also located in and adjacent to the area.

The boundaries of the Cherry Point UGA are shown below.

<i>UGA Employment Growth Proposal (2023-2045)</i>		
1	Phase I - Technical Report Middle Growth Projection	493
2	Phase II - Preliminary County Proposal	1,200
3	Difference	707
4	<p>Comments:</p> <p>The Technical Report middle employment growth scenario is based upon the share of employment that each UGA had in 2021. The Cherry Point UGA had 2.0% of the county-wide jobs in 2021 and was assigned this percentage for the Technical Report's middle growth allocation.</p> <p>The Whatcom County Comprehensive Plan states "The Cherry Point Urban Growth Area (UGA) contains approximately 7,000 acres of industrial land. The land has long been planned and designated by Whatcom County for industrial development . . ." (p. 2-53).</p> <p>Whatcom County Comprehensive Plan Goal 2CC is to "Maintain Cherry Point as an unincorporated urban growth area based on its unique location, characteristics and its significant contribution to the overall industrial land supply and Whatcom County's tax base."</p> <p>Comprehensive Plan Policy 2CC-1 is to:</p> <p style="padding-left: 40px;">Designate Cherry Point as a major industrial Urban Growth Area to accommodate major users that need to be located away from concentrated urban residential areas and that can manage their activities in such a way that they do not conflict with the goals of the Aquatic Reserve Management Plan.</p> <p>The Cherry Point area has long been utilized and recognized as an important industrial area in the County. In fact, the Cherry Point UGA had 7.1% of the county-wide industrial employment in 2021 (Technical Report, p 20). In order to support opportunities for industries to locate in the area and potential job growth (including from redevelopment of the Intalco site) the initial proposal is for an employment allocation of 1,200 for the Cherry Point UGA (2023-2045), which is above the Technical Report's high employment growth scenario of 769 jobs and above the current Comprehensive Plan's allocation of 890 jobs for this area.</p>	

IV. Land Capacity Analysis Overview

The preliminary land capacity analysis indicates the existing UGA can accommodate the proposed employment growth.

V. Summary

In summary, Whatcom County Planning and Development Services recommends a preliminary employment growth projection of 1,200 jobs for the Cherry Point UGA over the new planning period (2023-2045).

We are requesting the Planning Commission to hold a public hearing and make recommendations to the County Council on this preliminary growth projection. It's anticipated that the County Council will consider a non-binding multi-jurisdictional resolution relating to the preliminary growth projections in late 2024 or early 2025.

Thank you for your consideration of this matter. We look forward to discussing it with you.

2025 Comp Plan Update Urban Growth Area (UGA) Review

Columbia Valley UGA Preliminary Growth Proposal

October 31, 2024

I. Introduction

The Washington State Growth Management Act (GMA) requires certain counties, and the cities within those counties, to engage in regular planning for future population, housing and employment growth. The last Whatcom County Comprehensive Plan update was completed in 2016. The GMA requires Whatcom County to review and revise its Comprehensive Plan and development regulations by December 31, 2025 (RCW 36.70A.130).

Growth Management Act (GMA) planning goal 11 requires coordination between jurisdictions in the 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). The GMA was amended by House Bill 1220, adopted by the State Legislature in 2021. These amendments require the County and the Cities to plan for existing and projected housing needs, including needs of low and moderate income households (RCW 36.70A.070(2)). Therefore, Whatcom County and the cities are undertaking a joint planning process to allocate population, housing and employment growth in association with the comprehensive plan updates.

The population and employment growth projection process is being undertaken in several phases.

Phase I - As an initial step in this process, the County and Cities jointly funded a report entitled *Whatcom County Comprehensive Plan Population and Employment: Growth Projections and Preliminary Allocation* [Technical Report](#) (Leland Consulting Group, May 22, 2024, hereinafter referred to as "Technical Report"). This report shows how future population and employment growth would be allocated to UGAs if based primarily on historical growth shares.

Phase II – The County and Cities consider GMA requirements, local government goals and policies, public input, infrastructure availability, land capacity, past trends and other factors when planning for future population and employment growth. Existing interlocal agreements indicate that the County and Cities will work together to develop proposed population and employment projections. Therefore, each City is developing preliminary population and employment projections for their respective UGA. The County is proposing preliminary projections for the Birch Bay UGA, Columbia Valley UGA, Cherry Point UGA and Rural & Resource Lands (outside UGAs). The County Planning Commission will hold a public hearing on November 14 and issue recommendations to the County Council on the County and City preliminary growth proposals.

The County Council will consider a non-binding multi-jurisdictional resolution relating to the preliminary growth projections in late 2024 or early 2025 (similar to non-binding [Resolution 2014-013](#) approved in the last Comp Plan update process). The preliminary growth projections in the non-binding multi-jurisdictional resolution would provide a common starting point for developing draft land use planning

proposals and draft capital facility plans. Final growth projections would be adopted in the 2025 Comprehensive Plan update.

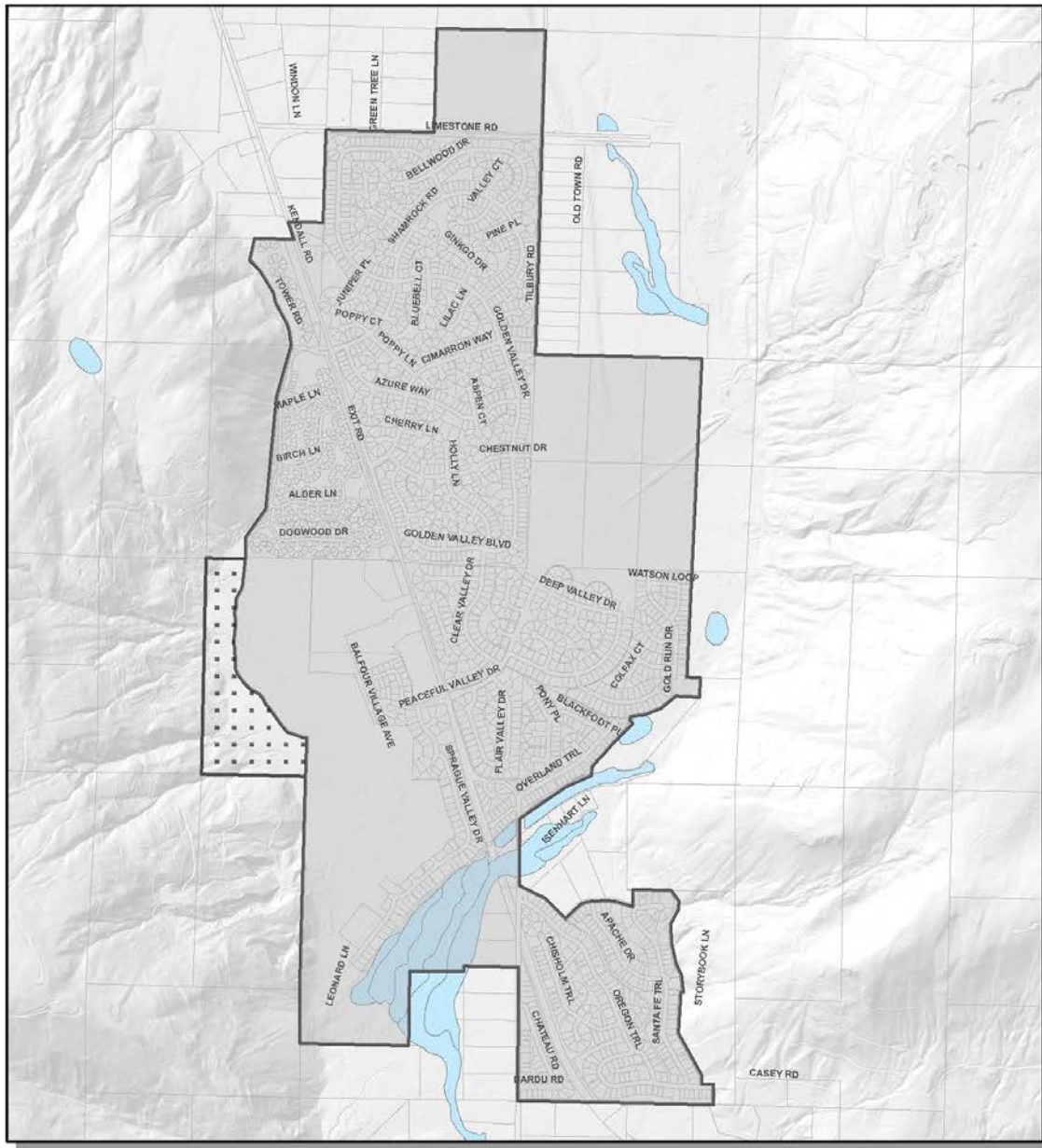
II. UGA Profile

The Columbia Valley is located between Sumas Mt. and Red Mt., southeast of Sumas. The Columbia Valley area was originally developed with several relatively large subdivisions to cater to a seasonal population. However, because real estate prices were affordable, the area became more attractive for full-time residents and has transitioned to a higher percentage of year-round housing.

In 2009, a General Commercial zone was established in the Columbia Valley UGA (Ordinance 2009-071). A Planned Town Center designation, that corresponded to the General Commercial zone, was included in the 2011 Foothills Subarea Plan. The concept of a Planned Light Impact Industrial area north of Limestone Rd. was also included in the 2011 Foothills Subarea Plan (although this area has not yet been rezoned to Light Impact Industrial). The approximate acreages of land use designations in the current UGA are as follows:

Planned Town Center designation/General Commercial zone:	42
Planned Light Impact Industrial designation:	38
Urban Residential (UR4) zone:	<u>1,076</u>
Total:	1,156

The boundaries of the Columbia Valley UGA and UGA Reserve (which could be considered for UGA status in the future) are shown below.



- Columbia Valley Urban Growth Area

- Urban Growth Area
- Urban Growth Area Reserve

USE OF WHATCOM COUNTY'S GIS DATA IMPLIES THE USER'S AGREEMENT WITH THE FOLLOWING STATEMENT:

Whatcom County makes no warranty of merchantability or fitness for use of this map for any particular purpose, either express or implied. No representation or warranty is made concerning the accuracy, currency, completeness or quality of data included on this map. Any user of this map assumes all responsibility for use thereof, and the user agrees to hold Whatcom County harmless from and against any damages, loss, or liability arising from any use of this data.

0 300 600 1,200 1,800 2,400 Feet



The Columbia Valley UGA is approximately 1.8 square miles (1,156 acres) and has an estimated 2023 population of 3,577 (Technical Report, p. 10). Developed land in the UGA is characterized by single-family residential development within the Paradise Lakes, Peaceful Valley, Red Mountain Estates, and Balfour Village subdivisions and recreational units in Camper's Paradise. The East Whatcom Regional Resource Center created a focal point for the community in the Planned Town Center when it opened in 2011.

The population within the current UGA boundaries for Census years, population growth, and the average annual growth rates in previous decades are shown below:

Population Growth in the Columbia Valley UGA (1990-2020)

Year	Population	Growth for Decade	Average Annual Growth for Decade	Average Annual Growth Rate	Share of Countywide Growth for Decade
1990	454				
2000	2,384	1,930	193	18.0%	4.9%
2010	3,056	672	67	2.5%	2.0%
2020	3,353	297	30	0.9%	1.2%

Source: Population data from 1990 and 2000 is from the *Whatcom County Population and Employment Projections and Urban Growth Area Allocations Phase I Technical Report* (BERK, 2013). Population data for 2010 and 2020 from the State Office of Financial Management's Small Area Estimates Program.

Real estate in the Columbia Valley UGA is relatively more affordable and it is anticipated that residential development will continue over the planning period. However, the UGA does not have an associated commercial or industrial base to provide job opportunities close to home for almost 3,600 residents. Therefore, the 2009 UGA review and the 2011 Foothills Subarea Plan were designed to provide opportunities for businesses to locate in the UGA by establishing land use designations that support such development.

III. Preliminary UGA Growth Proposal

This section of the report compares the Technical Report middle population and employment growth projections for the Columbia Valley UGA, which are based primarily upon historical population and employment shares, to the preliminary County proposal for growth in the UGA.

<i>UGA Population Growth Proposal (2023-2045)</i>		
1	Phase I - Technical Report Middle Growth Projection	988
2	Phase II - Preliminary County Proposal	1,137
3	Difference	149
4	<p>Comments:</p> <p>The Columbia Valley UGA had relatively high growth from 1990-2000 (193 people per year) and more moderate growth from 2000-2010 (67 people per year). The Columbia Valley UGA grew at a slower pace from 2010-2020 (30 people per year).</p> <p>While housing tends to be less expensive in the the Columbia Valley UGA, it is about a 50-mile round trip to downtown Bellingham. Therefore, gas prices influence overall cost of living in this area. Adequate land supply, public water & sewer in portions of the UGA, and less expensive housing have led to a growing Columbia Valley UGA community that has increased from 2,384 residents in 2000 to 3,353 in 2020.</p> <p>The Technical Report middle population growth scenario, which is based upon the share of countywide growth the UGA received from 2013 to 2023, would equate to an additional 45 people per year in the Columbia Valley UGA from 2023-2045. The initial proposal extrapolates the annual average population growth in the UGA between 2013 and 2023 to the new planning period (2023-2045). The proposed growth allocation of 1,137 would equate to about 52 people/year through 2045.</p>	

<i>UGA Employment Growth Proposal (2023-2045)</i>		
1	Phase I - Technical Report Middle Growth Projection	13
2	Phase II - Preliminary County Proposal	350
3	Difference	337
4	<p>Comments: The Technical Report middle employment growth scenario is based upon the share of employment that each UGA had in 2021. Although the Columbia Valley UGA had 1.5% of the county-wide population in 2023, it only had 0.1% of the county-wide jobs (2021).</p> <p>The vision statement in the Foothills Subarea Plan states, in part: “. . . The Columbia Valley will become a fully-served urban area set within this rural context, providing a range of shopping, housing, and employment opportunities and accommodating the majority of new Foothills residents. . .” (p. 2-6). The Subarea Plan also contains the following goal and policy:</p> <p>Goal LU4 – Provide for increased employment opportunities in the Foothills.</p> <p>Policy LU4A - Encourage development of light impact industrial or business park land uses in the Columbia Valley UGA in areas planned for light impact industrial uses.</p> <p>If the Technical Report middle growth allocation of 13 jobs was adopted (2023-2045), with the proposed population allocation, the Columbia Valley UGA would add about 1 job for every 87 new residents over the planning period. Such an allocation would also be substantially lower than the 359 jobs allocated to the Columbia Valley UGA in the current Whatcom County Comprehensive Plan.</p> <p>The Foothills Subarea Plan indicates that many Foothills residents must commute 30 minutes or more to western Whatcom County to work (p. 7-1). The Subarea Plan also indicates that the Planned Town Center/General Commercial zone and the Planned Light Impact Industrial area were intended to boost economic development in the Columbia Valley UGA (p. 7-5).</p> <p>In order to support opportunities for businesses to locate in the Columbia Valley UGA and potential job growth, the initial proposal is for an employment allocation of 350 jobs over the new planning period from 2023 to 2045.</p>	

IV. Land Capacity Analysis Overview

The preliminary land capacity analysis indicates the existing Columbia Valley UGA can accommodate the proposed population growth projections with potential rezoning of some land within the UGA from Urban Residential 4 units/acre to Urban Residential Medium Density 6 units/acre to allow multi-family housing to satisfy the requirements of House Bill 1220. The preliminary land capacity analysis indicates the existing Columbia Valley UGA can accommodate the proposed employment growth, with a potential rezone to Light Impact Industrial north of Limestone Rd. as set forth in the Foothills Subarea Plan.

V. Summary

In summary, Whatcom County Planning and Development Services recommends a preliminary population growth projection of 1,137 and an employment growth projection of 350 jobs for the Columbia Valley UGA over the new planning period (2023-2045).

We are requesting the Planning Commission to hold a public hearing and make recommendations to the County Council on these preliminary growth projections. It's anticipated that the County Council will consider a non-binding multi-jurisdictional resolution relating to the preliminary growth projections in late 2024 or early 2025.

Thank you for your consideration of this matter. We look forward to discussing it with you.

Urban Growth Area Review

City of Everson

Preliminary

UGA Growth Allocation Proposal

October 31, 2024

I. Introduction

Growth Management Act (GMA) planning goal 11 requires coordination between jurisdictions in the 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 are undertaking a joint planning process to allocate population and employment growth in association with the urban growth area review, which must be completed by December 2025 (RCW 36.70A.130).

The population and employment growth allocation process is being undertaken in several phases.

Phase I - As an initial step in this process, the cities and County jointly funded a report entitled "Whatcom County Comprehensive Plan Population and Employment: Growth Projections and Preliminary Allocations" (Leland Consulting, 2024). This report shows how future population and employment growth would be allocated to UGAs if based primarily on historical shares.

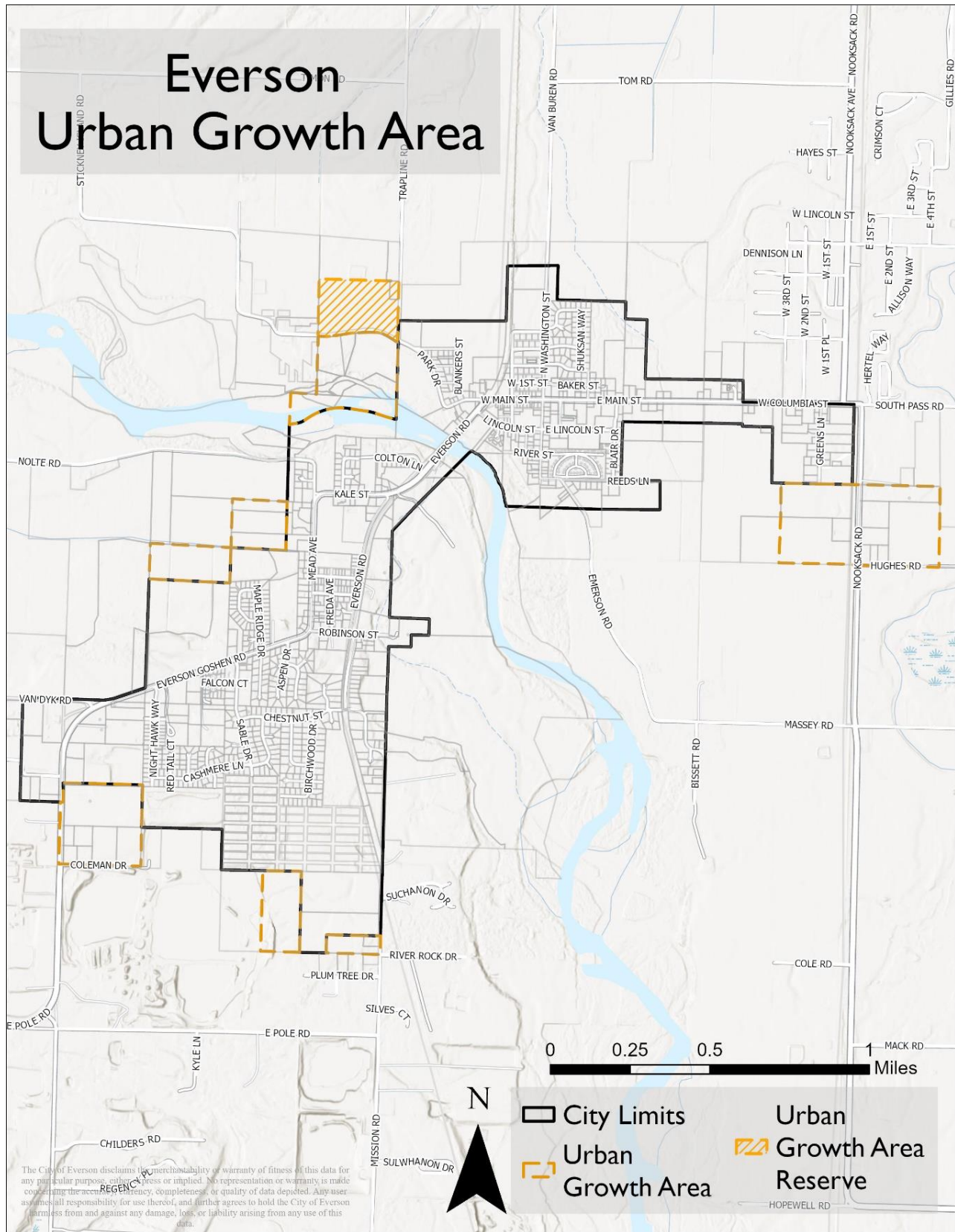
Phase II - Cities and County are not required to plan for the future based solely upon past trends. Local government goals and policies, public input, infrastructure availability, land capacity, and other factors are also taken into consideration. Existing interlocal agreements indicate that the County and cities will work together to develop proposed population and employment allocations to UGAs. At the request of the County, each city is developing recommended population and employment allocations for their respective UGAs. These recommendations will be subject to public review prior to consideration of a non-binding multi-jurisdictional resolution relating to preliminary growth allocations by the County Council and seven cities councils in late 2024 or early 2025.

The preliminary growth allocations approved in the multi-jurisdictional resolution would provide a common starting point for conducting environmental review, further analyzing land capacity, developing draft land use planning proposals, transportation modeling and developing draft capital facility plans. Final growth allocations would be adopted in the 2025 Comprehensive Plan update.

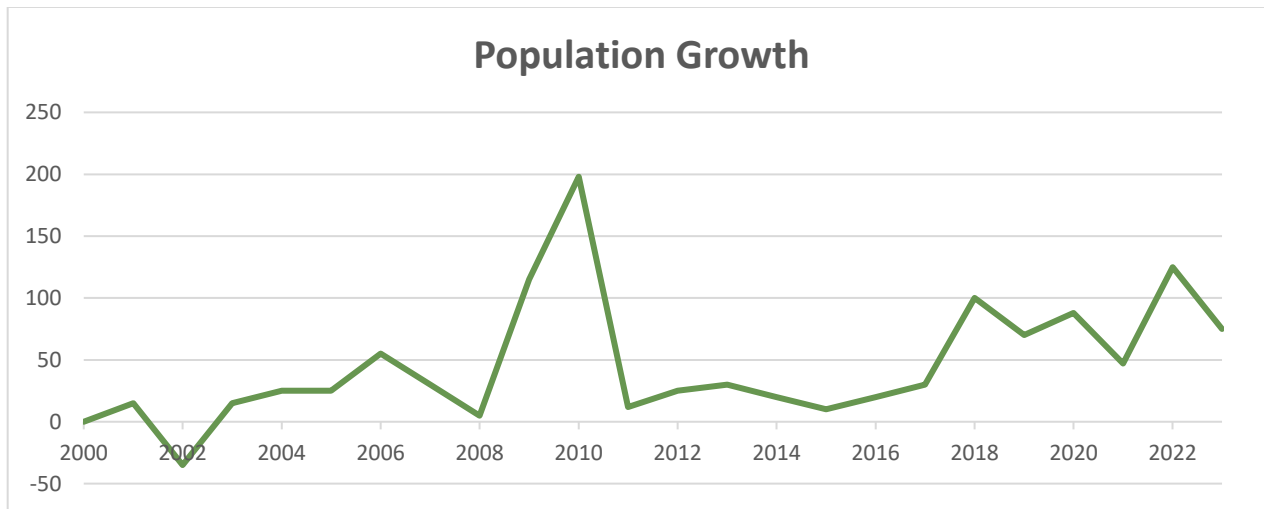
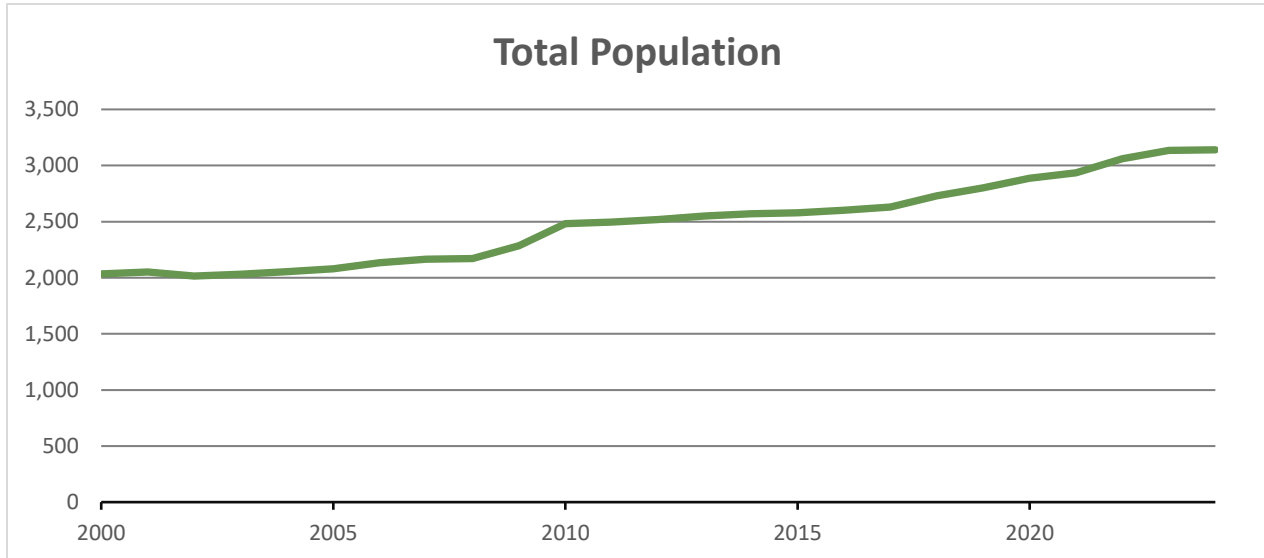
II. City Profile

The City of Everson is a small town located near the center of the western half of the county. The current City limits includes an area of approximately 1,024 acres. The town originally developed along a major transportation corridor from Bellingham to Sumas that included one of the major crossing points over the Nooksack River. Everson is situated just to the southwest of the neighboring city of Nooksack. State Highway 544 (Main Street) runs east-west through the center of town and is a major transportation route for both cars and trucks.

Everson Urban Growth Area



Similar to many other small towns in the county, Everson had a relatively low population for many years. In the late 2000s, the city began to see a surge in population growth that moderated somewhat during the early 2010s and has surged again in recent years. Over the entire ten year time period from 2013 to 2023, Everson has seen an average annual rate of growth of 1.7 percent. The population of Everson has now increased to an estimated 3,135 people as of April 1, 2023.



(OFM, 2024)

The City of Everson has a growing commercial sector that includes a shopping center and pharmacy, a number of restaurants and coffee shops, several medical and other service providers, auto repair businesses, building and agricultural supply stores, Everson Auction Barn, and other small businesses. The Everson industrial sector includes the SELCO lumber mill, Nylatech (plastics manufacturing), Criterion Athletic (sporting goods manufacturing) and other smaller businesses. The Everson elementary school and the Everson Library are also located within City limits.

III. Preliminary UGA Growth Allocation Proposal

This section of the proposal compares the Phase I Technical Report medium UGA growth allocation (Leland Consulting, 2024), which is based primarily upon historical population and employment shares, to the preliminary City proposal for growth allocations to the UGA.

<i>UGA Population Allocation Proposal</i>		
1	Phase I - Technical Report Medium Growth Allocation	933
2	Phase II - Preliminary City Proposal	1,408
3	Difference	475
4	Comments: Everson's proposed population growth allocation is based on an anticipated average annual increase of 64 people per year from 2023 to 2045, which equates to 1.7 percent of the overall growth projection for the county as a whole based on the Leland high growth projection.	

The City offers the following information in support of its proposed population growth allocation:

- Modest proposal. Everson grew an average of 48 people per year between 2013 and 2023. This was an average growth rate of 1.7%. The Everson proposal anticipates an average annual increase of 64 people per year, which is faster growth than seen in the 2000s and 2010s.
- According to the numbers presented in the Leland Consulting Report (2024), between 2013 and 2023, Everson had a growth rate of 1.7%, an increase of 488 people across 10 years.
- The current City proposal to receive 1.7 percent of overall county growth represents a continuation of the trend that anticipates an increased percentage of growth shifting from rural areas into urban growth areas.
- Growth since last county comprehensive plan. In the County comprehensive plan that was adopted in 2016, the County allocated a total population increase of 1,242 people to the Everson UGA over the 23-year period from 2013-2036. This equated to an average annual increase of approximately 54 people per year and approximately 1.8% of overall county growth during the period. Since 2016, Everson has had an increase of 535 people, which equates to an average of 76 people per year. This represents a growth rate of 2.7% across 7 years (OFM April 1 Population Estimates, 2024). This is significantly higher than the growth allocated to the City in the county comprehensive plan.

<i>UGA Employment Allocation Proposal</i>		
1	Phase I - Technical Report Medium Growth Allocation	203
2	Phase II - Preliminary City Proposal	602
3	Difference	399
4	Comments: Everson's proposed employment growth allocation is consistent with the consultant high allocation included in the current County comprehensive plan.	

The City offers the following information in support of its proposed employment growth allocation:

- This proposal is the same as the proposed growth in the 2016 county comprehensive plan.
- This allocation, which is above the Technical Report high UGA growth allocation, would afford the opportunity for increased growth in local businesses that would allow local residents to work near their homes.

IV. 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. A surplus or deficit will be considered by the city when evaluating potential UGA boundary changes. The City of Everson expects a capacity deficit in population growth capacity in our existing UGA. To accommodate this likely deficit, Everson anticipates increasing residential densities and adjusting current UGA boundaries to replace undevelopable UGA land with developable UGA land outside of the floodplain. Regarding employment capacity, the City anticipates that the land capacity analysis will show a modest surplus of capacity within the exiting UGA

2025 Comp Plan Update Urban Growth Area Review

City of Ferndale Preliminary Growth Allocation Proposal

November 1, 2024

I. Introduction

The Washington State Growth Management Act (GMA) requires certain counties, and the cities within those counties, to engage in regular planning for future population, housing and employment growth. Ferndale's Comprehensive Plan, as well as Whatcom County's, was last updated in 2016. The GMA requires Whatcom County, and the jurisdictions within them, to review and revise their Comprehensive Plans and development regulations by December 31, 2025 (RCW 36.70A.130).

Growth Management Act (GMA) planning goal 11 requires coordination between jurisdictions in the 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). House Bill 1220, adopted by the State Legislature in 2021, amended the GMA to require the county and the cities to plan for existing and projected housing needs, including needs of low and moderate income households (RCW 36.70A.070(2)). Therefore, Whatcom County and the cities are undertaking a joint planning process to allocate population, housing, and employment growth in association with proposed updates to their respective Comprehensive Plans.

The population and employment growth allocation processes are being undertaken in phases.

Phase I – As an initial step in this process, the County and Cities jointly funded a report entitled *Whatcom County Comprehensive Plan Population and Employment: Growth Projections and Preliminary Allocation [Technical Report](#)* (Leland Consulting Group, May 22, 2024, hereinafter referred to as "Technical Report"). This report shows how future population and employment growth would be allocated to UGAs if based primarily on historic growth shares.

Phase II – While past growth trends are important when looking ahead, local government goals and policies, public input, infrastructure availability, 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 projections. Therefore, each city is developing preliminary population and employment projections for their respective UGA. These recommendations will be subject to public review prior to consideration of a non-binding multi-jurisdictional resolution relating to preliminary growth allocations by the County Council and the seven cities' Councils in late 2024.

The preliminary growth allocations approved in the multi-jurisdictional resolution will provide a common starting point for conducting environmental review, further analyzing land capacity, developing draft land use planning proposals, transportation modeling, and draft capital facility plans. Final growth allocations will be adopted in the 2025 Comprehensive Plan update.

II. City Profile

From 2013 to 2023, the City of Ferndale was the fastest growing City within the County with a 2.6% average growth rate¹. During the Growth Management Act (GMA) era, the City has more than tripled in size, going from ~5,500 residents in 1990 to 16,762 residents in 2023. The City has a vibrant downtown, strong school system, a range of housing choices, and a growing job market.

While some may view Ferndale as a bedroom community, the City envisions itself as a transitioning community working towards a vision where community members can live, work and shop within the City. The City has approximately 8.8% of the total jobs within Whatcom County, and the second highest percentage of manufacturing jobs, behind only Bellingham². As the population continues to grow, so do the employment numbers. Ferndale is proud of our manufacturing base and the many products that are made within the City. The City is equally proud of the downtown and the locally owned business that make it thrive.

Ferndale is centrally located with Whatcom County with easy access to other communities. The Nooksack River flows through Ferndale adjacent to the downtown on its path from Mount Baker to the Pacific Ocean. The City is bisected by Interstate 5 running north to south through the community, with four (4) interchanges along the corridor at Slater Road, Main Street, Portal Way, and Grandview Road.

The City has sought to manage and guide growth through the adoption of development standards that result in efficient development. The City has also been adding new multifamily units throughout the community, with those multifamily projects comprising approximately 36% of the new units permitted between 2013 and 2021.

III. Preliminary UGA Growth Allocation Proposal

This section compares the Technical Report Medium Growth allocation, which is based primarily upon historical population and employment shares, to the preliminary City proposal for growth allocations to the UGA.

¹ OFM – Small Area Estimate Program (SAEP), December 2023; and Leland Consulting Group.

² Whatcom County Comprehensive Plan Population and Employment: Growth Projections and Preliminary Allocation [Technical Report](#).

<i>Ferndale UGA Population Allocation Proposal</i>		
1	Phase I - Technical Report Medium Growth Allocation	7,262
2	Phase II - Preliminary City Proposal (Technical Report Medium)	10,961
	Difference	(3,699)
	Comments: <ul style="list-style-type: none"> • Ferndale believes housing costs have increase in the last decade do, in part, to supply not meeting demand. • The City desires to plan for growth to ensure that supply does not inhibit the ability to meet future demand. • Ferndale has had a consistent, relatively high growth rate over the last 30 years. • Ferndale's growth rate has not dipped or peaked substantially within the time period. • Ferndale is the closest small city to Bellingham and may provide a close "small town" alternative to Bellingham's more urban atmosphere. • Ferndale's access to I-5 provides access to other communities, job centers, commercial services, and recreation opportunities • Ferndale believes that growth in unincorporated Whatcom County will slow over the twenty-year planning period and will not approach the growth experienced from 1990-present. 	

Ferndale UGA Employment Allocation Proposal		
1	Phase I - Technical Report Medium Growth Allocation	2,141
2	Phase II - Preliminary City Proposal (Technical Report Medium)	3,337
	Difference	(1,196)
	Comments: <ul style="list-style-type: none"> • The City desires to plan for growth to ensure that supply does not inhibit the ability to meet future demand. • Ferndale is situated in close proximity to the Vancouver Metropolitan Area of British Columbia and expects to continue to see interest from Canadian investors who are interested in opening manufacturing and commercial businesses within the community. • Ferndale believes job-creation industries such as retail, service, and a variety of professional and industrial sectors typically follow residential “roof tops” and population centers. • Ferndale has historically benefitted from industrial development at Cherry Point, not only through increased population growth, but increased employment growth including retail, services, and related industries. • Ferndale has been and will continue to be an alternative for businesses in Bellingham which have outgrown their current locations. • Ferndale is strategically located between Bellingham International Airport and one of its largest sources of passengers, the lower mainland of British Columbia. • Ferndale has existing interchanges on Interstate 5 that are underdeveloped, providing opportunities for a range of employers that are dependent on the interstate. 	

IV. Preliminary Land Capacity Analysis Overview

The preliminary run of the land capacity analysis shows the Ferndale UGA as being deficient in land available to accommodate the selected growth allocations for both population and employment uses. Below is a discussion of the actions that will be examined to accommodate the projected growth.

Population:

- Rezoning single family detached zoning to multifamily zoning within the City and UGA; and
- Increasing the minimum density for single family detached development; and
- Adding additional lands to the UGA from the existing UGA reserve.

Employment:

- Rezoning residential land to commercial to provide neighborhood commercial opportunities within existing and proposed residential areas within the City and UGA; and

- Rezoning commercial lands to manufacturing and light industrial
- Adding additional lands to the UGA from the existing UGA reserve.

2025 Comp Plan Update Urban Growth Area Review

City of Lynden Preliminary Growth Allocation Proposal

October 31, 2024

I. Introduction

The Washington State Growth Management Act (GMA) requires certain counties, and the cities within those counties, to engage in regular planning for future population, housing and employment growth. Lynden's Comprehensive Plan, as well as Whatcom County's, was last updated in 2016. The GMA requires Whatcom County, and the jurisdictions within them, to review and revise their Comprehensive Plans and development regulations by December 31, 2025 (RCW 36.70A.130).

Growth Management Act (GMA) planning goal 11 requires coordination between jurisdictions in the 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). House Bill 1220, adopted by the State Legislature in 2021, amended the GMA to require the county and the cities to plan for existing and projected housing needs, including needs of low and moderate income households (RCW 36.70A.070(2)). Therefore, Whatcom County and the cities are undertaking a joint planning process to allocate population, housing, and employment growth in association with proposed updates to their respective Comprehensive Plans.

The population and employment growth allocation processes are being undertaken in phases.

Phase I – As an initial step in this process, the County and Cities jointly funded a report entitled *Whatcom County Comprehensive Plan Population and Employment: Growth Projections and Preliminary Allocation* [*Technical Report*](#) (Leland Consulting Group, May 22, 2024, hereinafter referred to as "Technical Report"). This report shows how future population and employment growth would be allocated to UGAs if based primarily on historic growth shares.

Phase II – While past growth trends are important when looking ahead, local government goals and policies, public input, infrastructure availability, 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 projections. Therefore, each city is developing preliminary population and employment projections for their respective UGA. These recommendations will be subject to public review prior to consideration of a non-binding multi-jurisdictional resolution relating to preliminary growth allocations by the County Council and the seven cities' Councils in late 2024.

The preliminary growth allocations approved in the multi-jurisdictional resolution will provide a common starting point for conducting environmental review, further analyzing land capacity, developing draft land use planning proposals, transportation modeling, and draft capital facility plans. Final growth allocations will be adopted in the 2025 Comprehensive Plan update.

II. City Profile

The City of Lynden sits in the center of prime Whatcom County agricultural lands on a slight rise above the fertile bottom land of the broad Nooksack River floodplain. Lynden is in northwest Whatcom County, just 5 miles south of the Canadian border and 10 miles east of the Salish Sea (Birch Bay). The city is generally situated in an east-west orientation above the floodplain, with considerable commercial and industrial areas in the west, and a charming historic downtown with residential neighborhoods of various ages radiating from that downtown core.

Lynden tends to be a bedroom community, with amiable neighborhoods characterized by wide, well-maintained streets and public spaces. As Lynden looks to the next 20 years, it expects residential growth to continue in the northwest portion of the city (Pepin Creek Subarea) as well as infill locations across the city. Ongoing commercial and industrial opportunities abound along the Guide Meridian corridor and industrial properties to the west.

Like all of Whatcom County, Lynden has maintained a strong rate of growth for decades. Since the GMA was adopted in 1990, Whatcom County has added more than 100,000 residents. In that time, Lynden has nearly tripled its population – from 5,709 (1990) to 16,696 (2023) averaging around 300 new residents every year. Lynden has averaged an annual growth rate of ~2.5% since 2010. The Leland Technical Report (Population and Employment Projections) explains that Lynden (along with other small cities) has seen recent significant growth pressure during this time. In 2023, Lynden holds 7 percent of the County's population but has taken 12 percent of the last 10 years of county-wide growth – adding nearly 3,500 people since 2013.

For planning purposes, the Technical Report allocates population growth estimates across Whatcom County according to past growth rates and the history of each UGA's share of the County's growth. The report considers low (1.1%), medium (1.5%), and high (2.2%) annual projections out to 2045. Using these scenarios, Lynden can be expected to add anywhere from 4,500 to 10,000 residents by 2045.

The City's preliminary proposal, after consideration, is the Technical Report Medium Growth Projection (1.5%). As historic growth rates are closer to the Technical Report high projection, the city's initial internal discussions focused on the high projection. After further consideration, the city is proposing planning for the medium projection for several reasons:

- Past growth pressure (above 2%) has continued to place significant demands on city services – particularly schools and transportation. Growth at this level is unsustainable without major investment in these areas.
- The majority of remaining vacant UGA land, particularly land that is available for residential growth, is more difficult to develop due to the need for major infrastructure improvements, and the presence of a high-water table and critical areas (Pepin Creek). While infill is expected to continue across the city, especially as new vacant lots become rare, infill projects can be politically difficult. Furthermore, the city's new Mixed-Use Overlay (2022) can theoretically accommodate significant population growth, the overlay has not yet been tested.

- With the recent SW Lynden Annexation (2024), the city is reaching the western limits of its UGA boundary. Much of this annexed land is slated for industrial growth (~180 acres), which holds capacity for significant employment development. Recent industrial developments in West Lynden provide a wide variety of employment opportunity. Some projects, such as industrial freezers, tend to have a low number of employees for their size, other proposed projects (food processing, and Lynden Door expansions) provide jobs for hundreds of employees. Recognizing this variety, the city is proposing the Technical Report Middle Employment Growth allocation.

III. Preliminary UGA Growth Allocation Proposal

This section compares the Technical Report Medium Growth allocation, which is based primarily upon historical population and employment shares, to the preliminary City proposal for growth allocations to the UGA. In Lynden's case, these proposals are the same.

<i>Lynden UGA Population Allocation Proposal</i>		
1	Phase I - Technical Report Medium Growth Allocation	6,665
2	Phase II - Preliminary City Proposal (Technical Report Medium)	6,665
	Difference	0
	Comments: See above	

<i>Lynden UGA Employment Allocation Proposal</i>		
1	Phase I - Technical Report Medium Growth Allocation	1,799
2	Phase II - Preliminary City Proposal (Technical Report Medium)	1,799
	Difference	0
	Comments: See above	

IV. Preliminary Land Capacity Analysis Overview

The preliminary run of the land capacity analysis shows the Lynden UGA as having enough land available to accommodate the selected growth allocations. In the coming months, the city will be working on housing allocations for the various economic categories. It is expected that this will require a minor zoning change to accommodate higher residential density in the Mixed-use Overlay. As the capital facilities, housing, and land use elements progress and the information is further refined, there will be additional opportunities to refine the results of the analysis to lead to the final growth allocation proposal.

Urban Growth Area Review



Preliminary UGA Growth Allocation Proposal

October 31, 2024

I. Introduction

Whatcom County and its Cities are undertaking a joint planning process to allocate population and employment growth in conjunction with the Urban Growth Areas (UGA) review and Comprehensive Plan Update process due December 31st, 2025 (RCW 36.70A.130, and SHB 2296). The previous update was completed in 2013-2016.

The Growth Management Act (GMA) Planning Goal #11 requires collaboration with the public and between jurisdictions (RCW 36.70A.020(11)) and County and city plans are directed to be coordinated and consistent where they share common boundaries and related regional issues (RCW 36.70A.100).

Whatcom County and its cities, established a countywide planning policy and framework for identifying where population growth and infrastructure investment will occur over the next twenty years, 2025-2045 ([RCW 36.70A.115](#) and 215). This City/County joint effort is being undertaken through several phases: Survey and Data Collection, Determination of Methodology, Analysis, Review and Final Resolution.

Preliminary Phase - Data Collection: As a result of the County's significant growth, the State required Whatcom County (including six other counties in WA) (RCW 36.70A.215) to conduct a Buildable Lands Inventory to "determine if its cities and counties have designated adequate amounts of residential, commercial and industrial lands to meet forecast growth in their Comprehensive Plans." ¹ Property Owner Surveys, Market Analyses and Inventories were completed from 2020 to 2022. ^{2,3,4.}

Phase I: The cities and County next jointly funded a report, *Whatcom County Comprehensive Plan Population and Employment: Growth Projections and Preliminary Allocations Technical Report* ⁷. This document forecasts how future population and employment growth would be allocated to UGAs if based on historical growth patterns and shares.

Phase II: Each UGA, within the context of the County has developed preliminary population and employment projections based on GMA requirements, local government goals and policies, public input, infrastructure availability, land capacity, past trends and other factors affecting future population and employment growth.⁸ State updates to the Growth Management Act effected since the previous Comprehensive Plan update (HB 1220) are included.

Interlocal agreements require the County and the cities together to develop proposed population and employment allocations to their respective UGAs. These recommendations are subject to public review prior to consideration of a Non-Binding Multi-jurisdictional Resolution accepting preliminary growth allocations by the County Council and the seven Cities' Councils in late 2024 or early 2025.

The preliminary growth allocations approved in the Multi-Jurisdictional Resolution is the common starting point for the next phase; conducting environmental reviews, further analyzing land capacity, developing draft land use planning proposals (including state directed policy changes to address housing shortages), transportation modeling and

developing draft capital facility plans. Final growth allocations will be adopted in the 2025 Comprehensive Plan update.

II. UGA Profile

The City of Nooksack is a small rural community, with a population of 1,573 as of 2023 (OFM). Located in northwestern Whatcom County in the Sumas and Nooksack River Valley, the city lies at the base of the foothills of the Cascade Mountains. The Nooksack River runs Southwest of the town with its overflow corridor running N/S along the community's western boundary. The Sumas River on Nooksack's eastern boundary runs North to British Columbia's Fraser River Valley joined by Swift and Breckenridge Creeks from the East.

The current city boundary includes an area of approximately 584 acres, or 0.91 square miles. Nooksack, originally platted prior to 1900 in anticipation of the railroad's arrival in 1890 to serve mining and logging interests, was incorporated 22 years later in 1912. Today, the community is situated North of the intersection of two state highways, SR-9 and SR-544. Highway 9 runs N/S and is a major trucking route across the Canadian border at Sumas. Originally marsh and valley forest, the surrounding area was clear-cut by 1914 and became predominantly agricultural, supported by mountain river drainage and rich alluvial soils.

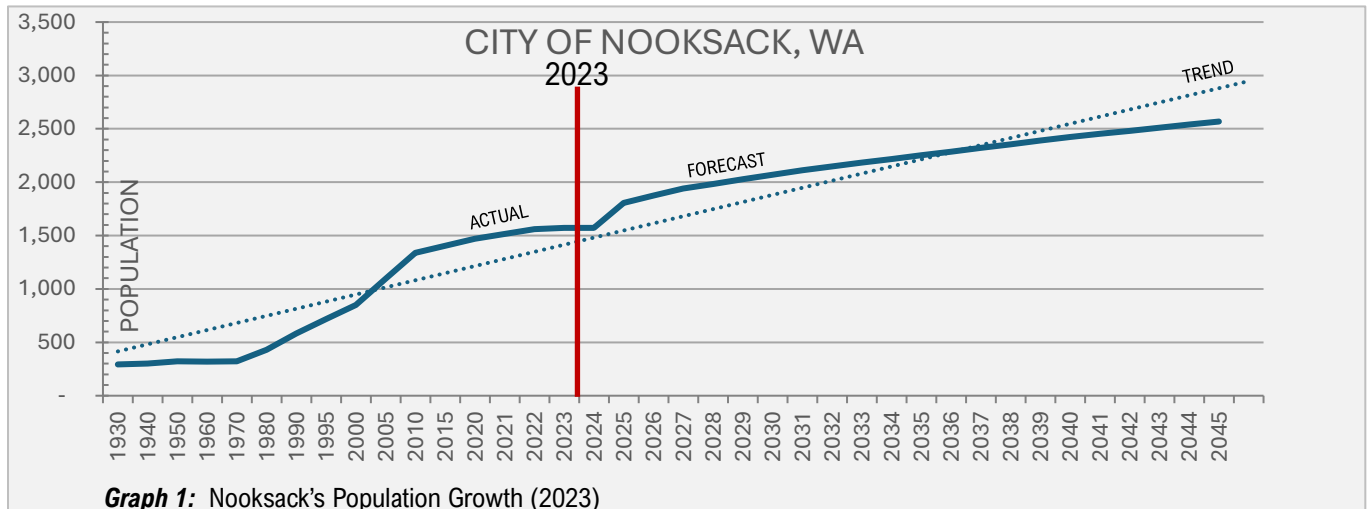
Like many of the other small towns in the county, Nooksack had a relatively low population through the early years and later in the 1990's experienced a steady increase that has continued to the present. Unlike neighboring cities, Nooksack's population surged during the economic downturn of 2008-2013. As of 2024, Nooksack is experiencing an above average increase in residential development and population growth (7.18% for 2023-4) which can be attributed to the availability of developable land within the city limits and the affordability of Whatcom County's rural communities.

The City of Nooksack is currently home to a relatively small commercial and industrial base that includes a number of gas stations, automotive repair shops, a farm store, a veterinary clinic, a trucking company, and other tertiary businesses.

There is an active rail spur that is currently used by two businesses. The Nooksack UGA also includes two public schools, the Nooksack elementary school and the Nooksack Valley middle school.

The population forecasts and municipal boundaries for Nooksack's UGA and Reserve are shown below.

TABLE 1: CITY OF NOOKSACK, LAND USE			
ZONE	PARCEL COUNT	% OF LAND AREA by PARCEL	AREA TOTAL (ACRES)
AG UR	5	4.51 %	23.44
CMD	13	0.63 %	3.28
COM	23	3.76 %	19.54
LI	9	7.52 %	39.13
OS AG	9	3.45 %	17.94
PU	13	10.38 %	54.00
R/R	2	2.86 %	14.89
R-8600	38	15.35 %	79.85
REC	2	0.28 %	1.46
RES	513	51.27 %	266.76
TOTAL	629	100.00%	520.28



NOOKSACK POPULATION GROWTH

Current and Forecast

Based on 2.88 People per DU (2023-2045)

*Census (ACS 5-YR Estimates)

August 14, 2024

NOOKSACK							
YEAR	WA OFM POP to 2023	EFF APR 01 EST POP GROWI	% ANNUAL GROWTH	HOUSING UNITS	FORECAST GROW	DVPLT	CP Update YEA
2010	1,338			457			
2011				464			
2012				443			
2013				481			
2014				489			
2015	1,405			498			
2016				505			
2017				514			
2018				520			
2019				539			
2020	1,471	44	2.99%	510			
2021	1,515	45	2.97%	531			
2022	1,560	13	0.83%	590			
2023	1,573	111	7.06%	547	37		
2024	1,684	121	7.18%	584	42	DVLPT 1	
2025	1,805	69	3.83%	626	24	DVLPT 2	1
2026	1,874	66	3.53%	650	23	DVLPT 2	2
2027	1,940	43	2.23%	673	15	Est.	3
2028	1,984	43	2.18%	688	15	Est.	4
2029	2,027	43	2.13%	703	15	Est.	5
2030	2,070	43	2.09%	718	15	Est.	6
2031	2,113	35	1.64%	733	12	Est.	7
2032	2,148	35	1.61%	745	12	Est.	8
2033	2,182	35	1.58%	757	12	Est.	9
2034	2,217	35	1.56%	769	12	Est.	10
2035	2,251	35	1.54%	781	12	Est.	11
2036	2,286	35	1.51%	793	12	Est.	12
2037	2,320	35	1.49%	805	12	Est.	13
2038	2,355	35	1.47%	817	12	Est.	14
2039	2,390	35	1.45%	829	12	Est.	15
2040	2,424	29	1.19%	841	10	Est.	16
2041	2,453	29	1.17%	851	10	Est.	17
2042	2,482	29	1.16%	861	10	Est.	18
2043	2,511	29	1.15%	871	10	Est.	19
2044	2,539	29	1.13%	881	10	Est.	20
2045	2,568			891		Est.	
NET GROWTH 2023-2045	995		63.27%	344	344		
	Population Growth		% Pop. Growth Increase	Projected DU Increase			

County Forecasted Population Allocation (Figure 2) vs. Planned				Employment Change		Revised Growth above allocation
Low	419.90%	237		Low	51	
Medium	282.72%	352		Medium	79	
High	187.41%	531		High	124	232

Table 2: Community Population/Housing Unit Growth and Projections.



III. Preliminary UGA Growth Proposal

This section of the report compares the County's Technical Report, **middle** population and employment growth projections for the city of Nooksack, WA based upon historical population and employment shares, to the preliminary County proposals for growth (Low, Medium, and High) in the UGA.

UGA Population Allocation Proposal		
1	Phase I - Technical Report Medium Growth Projection	352
2	Phase II - Preliminary City Proposal	995
3	Difference:	643
4	Comments: Nooksack's proposed population growth forecast is higher than Whatcom County's Medium Growth Allocation of 352 by 182.67% or 643 people, reflecting an increase of higher than anticipated development and growth. Nooksack's population in 2023 is 1,573 . Approved development through 2027 creates an approximate population increase of 367 , to an estimated 1,940 (based on 3 persons per household), exceeding the Medium Growth Allocation within 4 years.	

Nooksack is experiencing a higher than average, increase in growth rate, based on developments currently in construction or pending approval and as a result the city provides the following in support of its proposed growth allocation:

- **Population and Dwelling Unit (DU)** counts for 2023 through 2045 includes scheduled new housing construction within the UGA. Current development in the first phase (2023) added **37** units; a second phase adds **42** Units in 2024 and a separate development under construction at this reporting, adds **47** units over a two-year period (2025-26) for a total of **126** units.
- Anticipated slowing of growth occurs in line with completion of the subdivisions above to more closely follow Nooksack's historic share of countywide growth through the end of the planning period. Historically, Nooksack's **share of County growth** increased from **0.7%** in the 1990s to **1.4%** in the 2000s to the prescribed **Medium Growth Share of 0.9%** for **2023 to 2045**.
- **Growth since last County Comprehensive Plan:** In the County Comprehensive Plan that was adopted in 2016, the County allocated population increases to the Nooksack UGA which equaled an average annual increase of approximately 45 people per year or 1.4% of overall county growth. Since 2005, population growth underperformed forecasts, increasing by an average of only **26.5** people per year. The net effect was suppressed home values and increased affordability relative to the region. Within the last three years, Nooksack has two development projects in progress surpassing estimates and **Medium Growth** allocations.
- **Existing vacant lots and parcels** *within* the current city boundary and UGA, although limited, are identified to support new housing construction at higher

densities and at elevations out of the Floodplain. Previous planning for budgetary purposes for new housing was ten (10) dwelling units per year; however, at the current level of development it is reasonable to anticipate higher growth given current momentum, support for development from City Council and Administration and demand.

- **Land capacity:** Although Nooksack has experienced a recent increase in growth since 2016, it has not annexed its southern unincorporated UGA which has been set aside for Commercial use and a smaller portion for Residential. Commercial and Light Industrial development is presently lagging Residential growth, despite increased construction and trucking / freight traffic along SR-9. Growth in Nooksack's Commercial and Central Market District is anticipated. Reserve lands set-aside for LI/COM are expected to be in demand within the time frame of the Current Comprehensive Plan update again reflecting local policy and administration efforts.
- The **Land Capacity Analysis (LCA)** for Nooksack may also support the addition of land to the City's UGA, designated as Residential that is relatively central within Nooksack. This area was previously removed from UGA annexation during the 2016 Comprehensive Plan Update and may now be viable for development as the County is actively mitigating naturally occurring asbestos contained in sediment deposits further upstream on Swift Creek, and outside municipal boundaries.
- **Flood Risk.** For communities within the Nooksack and Sumas River Valleys that are prone to significant cyclical flood events and resulting property losses, reconsideration of land above the Floodplain and immediately south and north of the UGA (parallel to FEMA Flood Zones) may necessarily direct proactive N/S municipal expansion.

UGA Employment Allocation Proposal		
1	Technical Report Medium Growth Allocation	79
2	Preliminary City Proposal	232
3	Difference:	153
4	Comments: Nooksack's proposed employment growth allocation is aligned with the population growth anticipated, based on current development and expansion over the next five years. As noted previously and given the current level of development, Commercial and Light Industrial growth is lagging Residential growth, partly constrained by the lack of COM / LI designated land.	

The Technical Report middle employment growth scenario is based upon the share of employment that each UGA held in 2021. The Nooksack UGA had 0.7 % of the county-wide population in 2023, and 0.3% of the county-wide jobs in 2021.

In addressing the proposed Employment allocation, Nooksack would note:

- North Central Whatcom County (Everson, Sumas, Nooksack and Lynden) held only 10% of total employment (2021) impacting the availability of services and increasing traffic miles to/from the region.
- Increased employment growth and available land for LI/COM in the region would aid in addressing the deficit of commerce and industry and improve access to amenities and services.
- Employment allocation at the local level underpins job creation and community investment to support sustainable local economic (town) centers.
- Lack of employment and services in the region effects increased traffic during regular commute / travel times as well as during off peak periods.

IV. Summary: A Land Capacity Analysis Overview

A land capacity analysis compares the community's *proposed* growth allocations to the current capacity of the UGA to *accommodate* growth. Whatcom County and its cities are, through the Comprehensive Plan Update, in the process of conducting an LCA for each jurisdiction. This preliminary proposal serves to align population and employment forecasts with planning and development targets.

Nooksack is experiencing significant growth in the near term and existing Commercial and Light Industrial lands are under-utilized. It is anticipated that the LCA will find that there is a modest land deficit which may limit the community's growth and ability to lend economic support to better service the region. Strategic initiatives in consideration include implementing increased residential and commercial densities, supporting in-fill development, and re-evaluating land outside of the Floodplain. Nooksack's UGA Reserve and additional identified areas immediately outside of the municipal boundary are suitable for UGA annexation consideration.

NOTES

1. MRSC.org. Growth Management Overview. Accessed October 25-30, 2024.
2. *Buildable Lands Report 2022, Whatcom County Review and Evaluation Program*. July, 2022. Revised February 27, 2023.
3. *Whatcom County Review and Evaluation Program Methodology*. Prepared by CAI, Community Attributes. Approved February 10, 2022.
4. *Whatcom County Land Capacity Analysis (LCA) for Permanent Housing and Employment Needs Methodology*. June 21, 2024.
5. *Whatcom County Comprehensive Plan and Development Regulations Update*. DRAFT Environmental Impact Statement. Prepared by SCJ Alliance Consulting Services. June 2024.
6. *Whatcom County Comprehensive Plan. Background Research on Selected Economic, Demographic and Housing Trends*. Prepared by Leland Consulting Group. July 18, 2024.
7. *Whatcom County Comprehensive Plan. Population and Employment: Growth Projections and Preliminary Allocations*. Prepared by Leland Consulting Group. May 22, 2024.
8. *2025 Comprehensive Plan Update. Urban Growth Area (UGA) Review. Columbia Valley UGA, Preliminary Growth Proposal*. Whatcom County, Long Range Planning. October 31, 2024.

Urban Growth Area Review

City of Sumas Preliminary UGA Growth Allocation Proposal

October 30, 2024

I. Introduction

Growth Management Act (GMA) planning goal 11 requires coordination between jurisdictions in the 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 are undertaking a joint planning process to allocate population and employment growth in association with the urban growth area review, which must be completed by December 2025 (RCW 36.70A.130).

The population and employment growth allocation process is being undertaken in several phases.

Phase I – As an initial step in this process, the cities and County jointly funded a report entitled “Whatcom County Comprehensive Plan Population and Employment: Growth Projections and Preliminary Allocations Technical Report (Leland, 2024). This report shows how future population and employment growth would be allocated to UGAs if based primarily on historical shares.

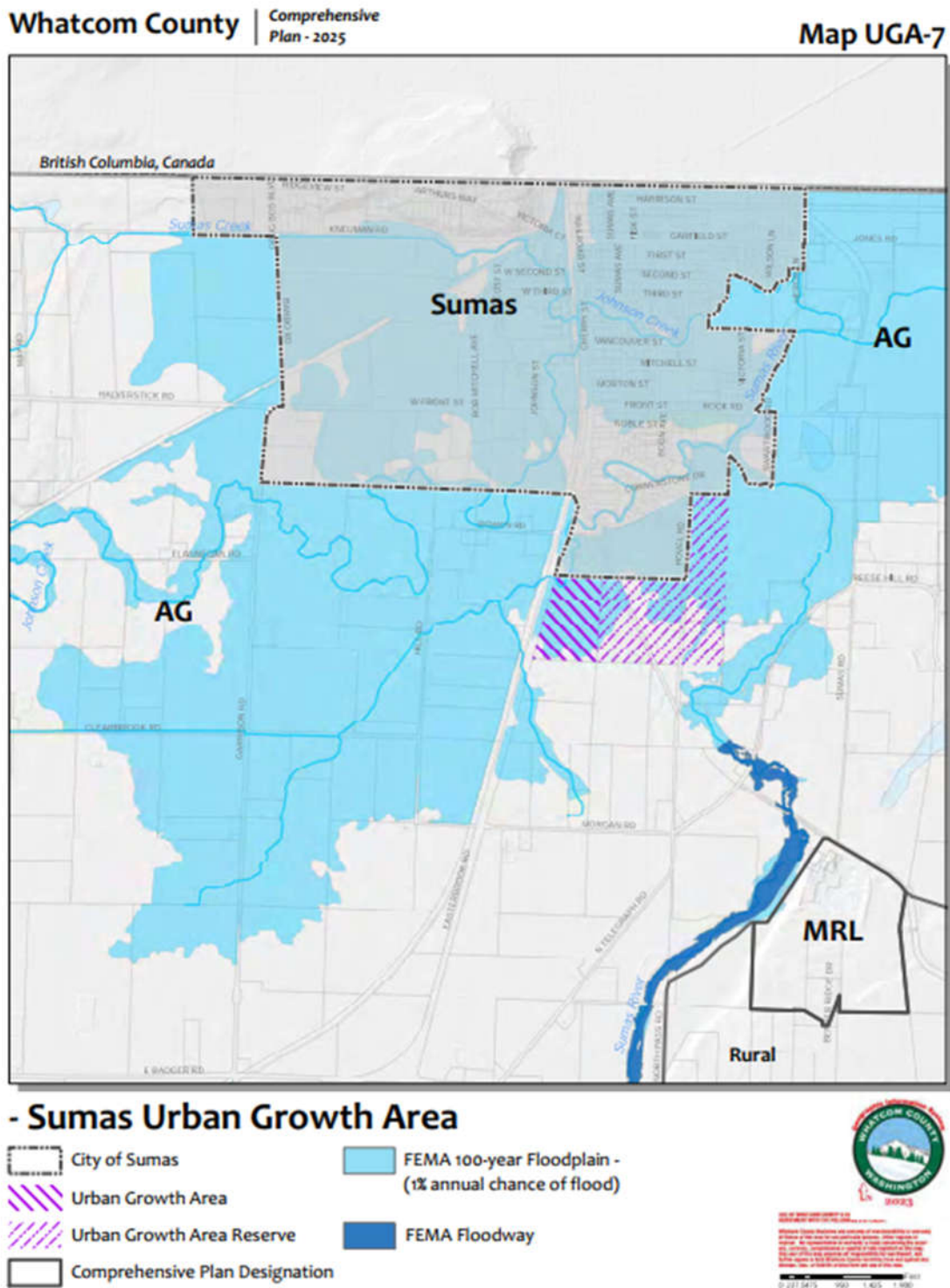
Phase II – Cities and County are not required to plan for the future based solely upon past trends. Local government goals and policies, public input, infrastructure availability, land capacity, and other factors are also taken into consideration. Existing interlocal agreements indicate that the County and the cities will work together to develop proposed population and employment allocations to UGAs. These recommendations will be subject to public review prior to consideration of a non-binding multi-jurisdictional resolution relating to preliminary growth allocations by the County Council and the seven city councils in 2024.

The preliminary growth allocations approved in the multi-jurisdictional resolution would provide a common starting point for conducting environmental review, further analyzing land capacity, developing draft land use planning proposals, transportation modeling and developing draft capital facility plans. Final growth allocations would be adopted in the 2025 Comprehensive Plan update.

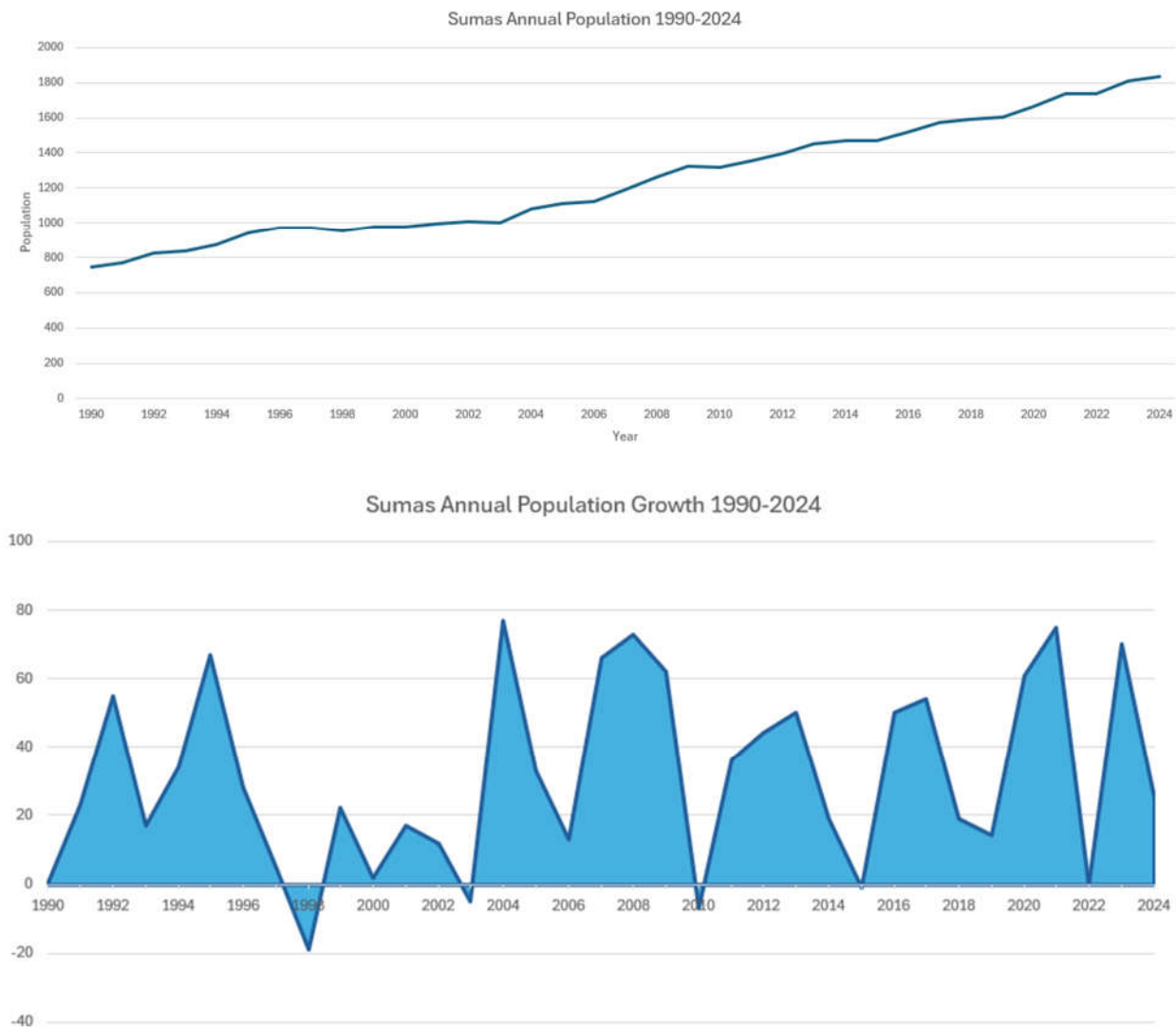
II. City Profile

The City of Sumas is a small town located along the US-Canada border adjacent to the Sumas-Abbotsford border crossing. The current City limits include 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-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 recreational opportunities located in the eastern part of the county.



Like many other small towns in the county, Sumas had a relatively low population for many years. In the 1990s the city began to see a steady increase in population that has continued to the present. Over the entire thirty-four-year period from 1990 to 2024, Sumas has seen an average annual growth rate of 2.6%. The population has now increased to 1,835 residents as of April 1, 2024.



The City of Sumas downtown commercial area includes several gas stations, a grocery store, a few shipping businesses, customs brokerage offices, an auto parts store, a number of restaurants, and other small businesses. Sumas has an extensive industrial district that includes a power generation facility, lumber milling and drying businesses, truck and rail reload businesses, an asphalt shingle manufacturing plant, a live-work area, a go-kart racetrack, a border patrol facility, and other manufacturing businesses. There are a number

of active rail spurs that are well used by local businesses. The Sumas elementary school and the Sumas Library are also located within City Limits.

III. Preliminary UGA Growth Allocation Proposal

This section of the proposal compares the Technical Report medium UGA growth allocation (Leland, 2024), which is based primarily upon historical population and employment shares, to the preliminary City proposal for growth allocations to the UGA.

<i>UGA Population Allocation Proposal</i>		
1	Technical Report Medium Growth Allocation	697
2	Preliminary City Proposal	1,000
3	Difference	303
4	Comments: Sumas' proposed population growth allocation is slightly lower than the Leland high growth allocation of 1,052 and includes an average 47.6 people per year from 2024 to 2045. This equates to approximately 1.8 percent of the overall growth projection for the county as a whole based on the OFM/Leland medium growth projection.	

The City offers the following information in support of its proposed population growth allocation:

- Flood Mitigation. This proposal is a response to the growing need for the City of Sumas to mitigate risks from future flooding. Especially after the 2021 Nooksack River flood event, during which Sumas saw 85 percent of its structures damaged by flood waters, the City feels that the best course of action is to grow Sumas in a direction that moves as many residents as possible out of the path of the flood.
- Average annual growth trend. In the 10 years between 2013 and 2023, Sumas' annual population growth was 37 people per year. This accounted for roughly 1.2 percent of the overall county growth during that same time period. As the county looks to shift more of its population growth from rural areas and into urban growth areas, more capacity will be needed to accommodate this shift.
- Growth since the last county comprehensive plan. In the County comprehensive plan that was adopted in 2016, the County allocated a total population increase of 874 people to the Sumas UGA over the 23-year period from 2013 to 2036. This equated with an average annual increase of approximately 38 people per year and approximately 1.3 percent of overall county growth during the period. Since 2013, the population of Sumas has increased by an average of approximately 35 people per year.
- Land capacity. Although Sumas has seen a slight decrease in annual growth since the last County comprehensive plan, Sumas has not annexed any of its

unincorporated urban growth area, meaning that all the growth that the City has seen is due to infill development. As the Land Capacity Analysis will likely show, Sumas is running out of capacity for further infill development, which could possibly explain the decrease in annual average growth. This proposal would seek to add more land to the City's urban growth area to help increase Sumas' annual growth rate.

UGA Employment Allocation Proposal		
1	Technical Report Medium Growth Allocation	150
2	Preliminary City Proposal	500
3	Difference	350
4	Comments: The technical report medium growth allocation for this County comprehensive plan is 71 jobs fewer than the technical report medium growth allocation from the 2013 County comprehensive plan, which is an approximate 32 percent decrease. The preliminary city proposal is 55 jobs more than the 2013 preliminary city proposal, which is a 12 percent increase. To accommodate this growth, the City proposes allocating some of the increase to its urban growth area towards industrial usage.	

IV. Land Capacity Analysis Overview

A land capacity analysis (LCA) compares the proposed growth allocations to the capacity of the UGA to accommodate growth. Whatcom County and the cities are currently in the process of conducting the LCA for each jurisdiction. As the results of the LCA are not complete, exact numbers cannot be included in this proposal. Below is a summary of the preliminary results of the LCA for both population and employment.

The preliminary LCA results show that Sumas' current capacity for new population is far less than the proposed population allocation of 1,000 new residents. This shows that Sumas is at a deficit in its developable residential land and supports the City's conclusion that more UGA will be required to accommodate this future growth.

Contrastingly, the preliminary LCA results show that Sumas' current employment capacity exceeds the proposed allocation of 500 new jobs. This is most likely due to several large vacant parcels in Sumas' industrial district where the property owners have so far been unwilling to develop or sell to a developer. These large vacant parcels are artificially increasing capacity within the Industrial District. The City will be looking to adjust the market factor percentages for the industrial zone in the LCA to account for the property owners' opposition to selling or developing this land.

2025 Comp Plan Update

Rural / Resource Lands Preliminary Growth Proposal

October 31, 2024

I. Introduction

The Washington State Growth Management Act (GMA) requires certain counties, and the cities within those counties, to engage in regular planning for future population, housing and employment growth. The last Whatcom County Comprehensive Plan update was completed in 2016. The GMA requires Whatcom County to review and revise its Comprehensive Plan and development regulations by December 31, 2025 (RCW 36.70A.130).

Growth Management Act (GMA) planning goal 11 requires coordination between jurisdictions in the 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). The GMA was amended by House Bill 1220, adopted by the State Legislature in 2021. These amendments require the County and the Cities to plan for existing and projected housing needs, including needs of low and moderate income households (RCW 36.70A.070(2)). Therefore, Whatcom County and the cities are undertaking a joint planning process to allocate population, housing and employment growth in association with the comprehensive plan updates.

The population and employment growth projection process is being undertaken in several phases.

Phase I - As an initial step in this process, the County and Cities jointly funded a report entitled *Whatcom County Comprehensive Plan Population and Employment: Growth Projections and Preliminary Allocation* [Technical Report](#) (Leland Consulting Group, May 22, 2024, hereinafter referred to as "Technical Report"). This report shows how future population and employment growth would be allocated to Rural and Resource Lands lands if based primarily on historical growth shares.

Phase II – The County and Cities consider GMA requirements, local government goals and policies, public input, infrastructure availability, land capacity, past trends and other factors when planning for future population and employment growth. Existing interlocal agreements indicate that the County and Cities will work together to develop proposed population and employment projections. Therefore, each City is developing preliminary population and employment projections for their respective UGA. The County is proposing preliminary projections for the Birch Bay UGA, Columbia Valley UGA, Cherry Point UGA and Rural & Resource Lands (outside UGAs). The County Planning Commission will hold a public hearing on November 14 and issue recommendations to the County Council on the County and City preliminary growth proposals.

The County Council will consider a non-binding multi-jurisdictional resolution relating to the preliminary growth projections in late 2024 or early 2025 (similar to non-binding [Resolution 2014-013](#) approved in the last Comp Plan update process). The preliminary growth projections in the non-binding multi-jurisdictional resolution would provide a common starting point for developing draft land use planning

proposals and draft capital facility plans. Final growth projections would be adopted in the 2025 Comprehensive Plan update.

II. Rural & Resource Lands Profile

Whatcom County has designated Rural and Resource Lands on the Comprehensive Plan map as required by the Growth Management Act. These lands, which are located outside UGAs, consist of the following designations and acreages:

Rural Lands

Rural (includes R5A and R10A zoning)	121,017
Rural Business	194
Rural Community	8,324
Rural Neighborhood	<u>3,071</u>
Subtotal	132,606

Resource Lands

Agriculture	85,820
Commercial Forestry	187,478
Rural Forestry	35,819
Mineral Resource Lands	<u>5,545</u>
Subtotal	314,662

Total Acres: 447,268

The Rural and Resource lands have an estimated 2023 population of 70,985 (Technical Report, p. 10). These areas contain a variety of land uses, including residential, commercial, industrial, home based businesses, agriculture, forestry, mining, parks, schools, and fire stations. The population within the Rural and Resource Lands for Census years is shown below:

Population Growth in Rural and Resource Lands (1990-2020)

Year	Population	Growth for Decade	Average Annual Growth for Decade	Average Annual Growth Rate	Share of Countywide Growth for Decade
1990	45,321				
2000	56,775	11,454	1,145	2.3%	29.3%
2010	64,862	8,087	809	1.3%	23.6%
2020	69,821	4,959	496	0.7%	19.3%

Source: Population data from 1990 and 2000 is from the *Whatcom County Population and Employment Projections and Urban Growth Area Allocations Phase I Technical Report* (BERK, 2013). Population data for 2010 and 2020 from the State Office of Financial Management's Small Area Estimates Program.

III. Preliminary Growth Proposal

This section of the report compares the Technical Report middle population and employment growth projections for the Rural and Resource Lands, which are based primarily upon historical population and employment shares, to the preliminary County proposal for growth in the UGA.

<i>UGA Population Growth Proposal (2023-2045)</i>		
1	Phase I - Technical Report Middle Growth Projection	10,773
2	Phase II - Preliminary County Proposal	9,000
3	Difference	-1,773
4	<p>Comments:</p> <p>The Technical Report middle population scenario is that population would increase in Rural and Resource Lands by 10,773 people over the planning period (2023-2045). The middle scenario, based upon the share of countywide growth the Rural and Resource Lands received from 2013 to 2023, would equate to an additional 490 people per year in the Rural and Resource Lands from 2023-2045. On an average yearly basis, this is comparable to growth experienced between the last two Censuses.</p> <p>The proposal is to allocate population growth of 9,000 new residents in the Rural and Resource Lands over the planning period (2023-2045). This number has been reduced from the 10,000 population growth figure originally suggested by Planning and Development Services. This reduction was based upon consideration of a motion made by the County Council's Committee of the Whole on October 22, 2024 to reduce the 10,000 growth figure.</p> <p>The 9,000 population growth projection for Rural and Resource Lands would equate to growth of about 409 people per year in these areas over the 22-year planning period and would continue the trend of lower growth experienced outside UGAs over the last three decades.</p>	

<i>UGA Employment Growth Proposal (2023-2045)</i>		
1	Phase I - Technical Report Middle Growth Projection	3,403
2	Phase II - Preliminary County Proposal	3,403
3	Difference	0
4	<p>Comments: The Technical Report middle employment growth scenario is based upon the share of employment that each area had in 2021. The Rural and Resource Lands (outside UGAs) had 30.1% of the county-wide population in 2023 and 14.0% of the county-wide jobs (2021).</p> <p>Whatcom County Comprehensive Plan Chapter 2 contains the following provisions under the heading of "Rural Employment Opportunities":</p> <p>Goal 2FF: Provide employment opportunities in the rural parts of Whatcom County.</p> <p>Policy 2FF-1: Support small businesses, cottage industries, home occupations, resource-based, tourist, recreational, and other appropriate industries in the rural areas of Whatcom County. New rural commercial and industrial uses that are more intensive than those permitted within rural zones as home occupations or cottage industries should be located within designated Rural Communities and Rural Business areas.</p> <p>Policy 2FF-2: Support resource-based industries that require only rural services, conserve the natural resource land base, and help maintain the rural character and lifestyle of the community. Assure adequate facilities, mitigation and buffers through development regulations.</p> <p>Policy 2FF-3: Ensure that business operations do not adversely impact adjacent residential, agricultural or forest land, or compromise water quality and quantity.</p> <p>Policy 2FF-4: Allow home-based occupations, cottage industries and small-scale tourist and recreational uses throughout the rural area provided they do not adversely affect the surrounding residential uses, agricultural uses, forestry uses, or rural character.</p> <p>Jobs in Rural and Resource Lands are associated with agriculture, forestry, mining, home based businesses, cottage industries, commercial or industrial uses in "limited areas of more intensive rural development" (LAMIRDs), public schools, etc. If the Technical Report middle growth allocation of 3,403 jobs was adopted as proposed, with the proposed population allocation, the Rural and Resource Lands would add about 1 job for every 2.6 new residents over the planning period. Recently, there is about 1 job for every 4.5 residents in Rural and Resource Lands. Additionally, such an allocation would be similar to the 3,201 jobs allocated to the Rural and Resource Lands in the current Comprehensive Plan.</p>	

IV. Summary

In summary, Whatcom County Planning and Development Services recommends a preliminary population growth projection of 9,000 and an employment growth projection of 3,403 jobs for the Rural and Resource Lands over the new planning period (2023-2045).

We are requesting the Planning Commission to hold a public hearing and make recommendations to the County Council on these preliminary growth projections. It's anticipated that the County Council will consider a non-binding multi-jurisdictional resolution relating to the preliminary growth projections in late 2024 or early 2025.

Thank you for your consideration of this matter. We look forward to discussing it with you.