

URBAN GROWTH AREA REVIEW



UGA/UGA Reserve Proposal

August 29, 2025

I. Introduction

The Growth Management Act (GMA) requires each county to designate urban growth areas (UGAs) within which urban growth will be encouraged (RCW 36.70A.110(1)). GMA planning goal 11 requires coordination between jurisdictions in the comprehensive planning process (RCW 36.70A.020(11)). Additionally, the GMA indicates that county and city comprehensive plans must be coordinated and consistent when they share common borders or related regional issues (RCW 36.70A.100). Therefore, Whatcom County and the cities have undertaken a joint planning process to allocate population, housing and employment growth, review permitted densities, and review UGA boundaries. The joint planning process includes a number of steps, including:

- Approval of interlocal agreements (2022).
- Preliminary County and city UGA population and employment proposals (2024).
- County Planning Commission review of preliminary city and County population and employment growth proposals (2024).
- County and city approval of non-binding multi-jurisdictional resolutions regarding preliminary population, housing and employment allocations (2025). *See Whatcom County Council Resolution 2025-011.*
- Draft Environmental Impact Statement (2025).
- Final Environmental Impact Statement (2025).
- City and County UGA boundary proposals (2025).
- County Planning Commission review (2025).
- County Council and City Council approval of comprehensive plans (2025-26).

UGAs must include areas and densities sufficient to accommodate the projected urban growth for the 20-year planning period (RCW 36.70A.130(3)), which extends through 2045. However, cities and the County are not required to plan for the future based solely upon past trends. Local government goals and policies, public input, new GMA requirements to plan for and accommodate housing for all economic segments of the community, infrastructure availability, capital facility planning, land capacity, and other factors are also taken into consideration.

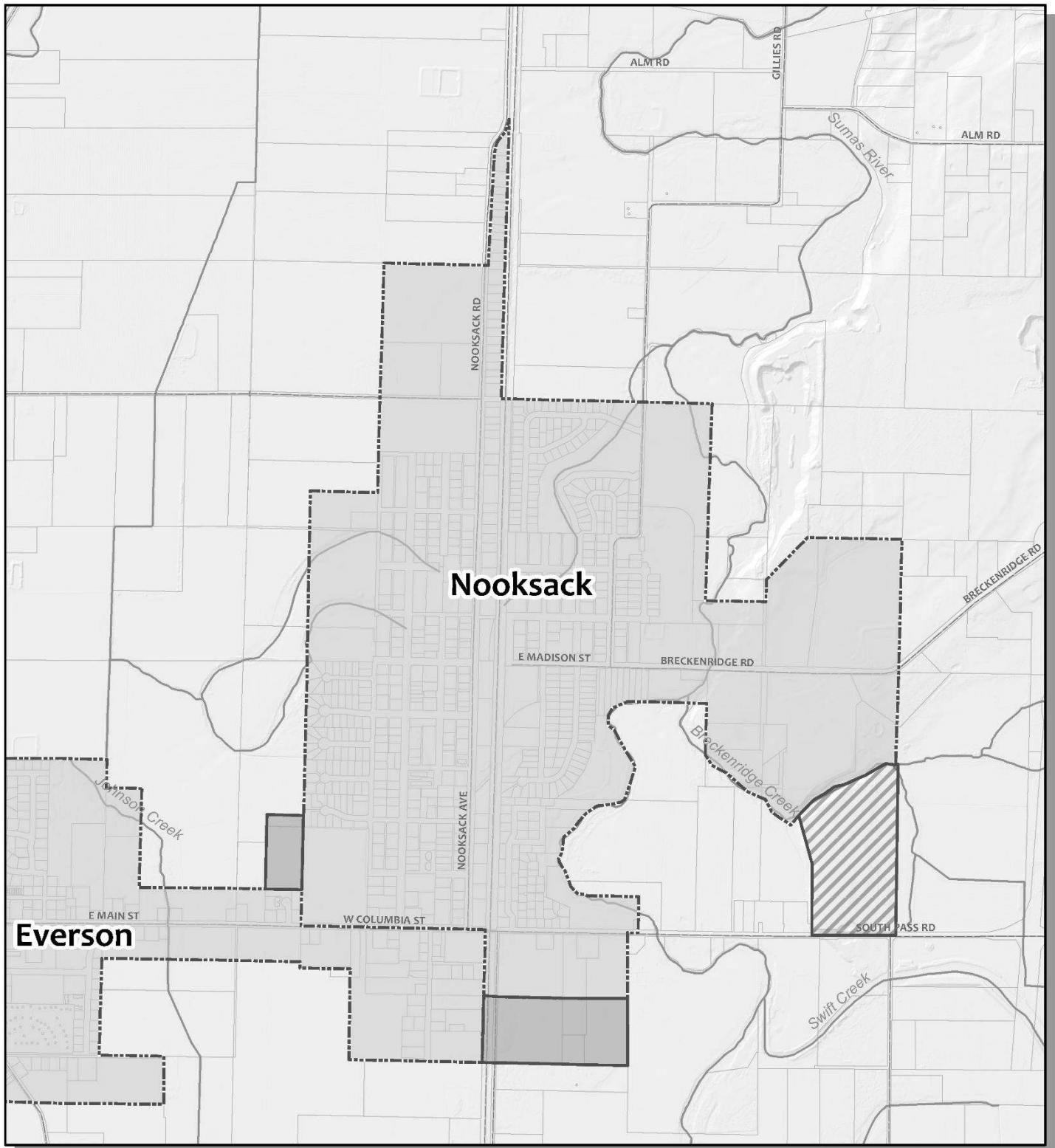
Existing interlocal agreements indicate that the County and cities will work together to develop proposed population and employment allocations to UGAs and review UGA boundaries. The County and cities are recommending UGA boundary proposals for their respective UGAs. Review of these proposals includes opportunities for public comments and County Planning Commission recommendations. Final growth allocations and UGA boundaries will be adopted by the County Council in the Comprehensive Plan update in 2025 or 2026.

II. City Profile

The City of Nooksack is a small town located in the middle of the county, just to the east of the city of Everson. As of April 1, 2025, the population of Nooksack was 1,825 according to the state office of financial management. The current City boundary includes an area of approximately 581 acres. The town was originally platted prior to 1900 and was subsequently incorporated in 1912. The town was initially constructed in anticipation of the coming of the railroad (which did arrive and still runs through town); however, after a few decades, major fires destroyed the great majority of the original structures.

Nooksack is situated at the crossroads of two state highways: SR 9 and SR 544. Highway 9 runs north and south through the center of town and is a major route used by truck traffic traveling to and from the border crossing at Sumas.

Nooksack is in the midst of a major boom in population growth, with the population having increased by 260 people in the past two years. This substantial level of growth is based on a cluster of new developments that are providing affordable housing options in a small-town setting. These developments are still underway, such that the population of the city is likely to increase by another 140 people in the next two years.



- Nooksack Urban Growth Area

-  City of Nooksack
-  Urban Growth Area
-  Urban Growth Area Reserve

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III. Review of Permitted Densities

The GMA, at RCW 36.70A.130(3)(a), requires that:

Each county that designates urban growth areas under *RCW 36.70A.110 shall review . . . its designated urban growth area or areas, patterns of development occurring within the urban growth area or areas, and the densities permitted within both the incorporated and unincorporated portions of each urban growth area. In conjunction with this review by the county, each city located within an urban growth area shall review the densities permitted within its boundaries, and the extent to which the urban growth occurring within the county has located within each city and the unincorporated portions of the urban growth areas.*

Zoning districts and permitted densities in the city and the portion of the UGA within unincorporated Whatcom County are shown below.

Table 1. Permitted Densities in the City		
Zoning Abbreviation	Zoning	Permitted Densities
R	Residential	Minimum lot size of 9,600 square feet, which equates to a maximum of 4.5 units per acre.
R-8600	Residential-8600	Minimum lot size of 8,600 square feet, which equates to a maximum of 5.1 units per acre.

The City's two residential zones also allow opportunities for multifamily residential development, which then supports 50 percent or greater increases in permitted densities.

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

IV. UGA Growth Allocation Proposal

This section of the proposal compares population and employment growth allocations in the 2025 City proposal to those in the non-binding multi-jurisdictional resolutions approved by the County and all cities in 2025.

As shown in the table below, the City of Nooksack's proposal is consistent with the allocations included in the non-binding resolution.

Table 3. UGA Population Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	995
2	City Growth Allocation Proposal	995
3	Difference	0

Table 4. UGA Housing Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	433
2	City Growth Allocation Proposal	433
3	Difference	0

Table 5. UGA Employment Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	232
2	City Growth Allocation Proposal	232
3	Difference	0

V. UGA / UGA Reserve Boundary Proposal

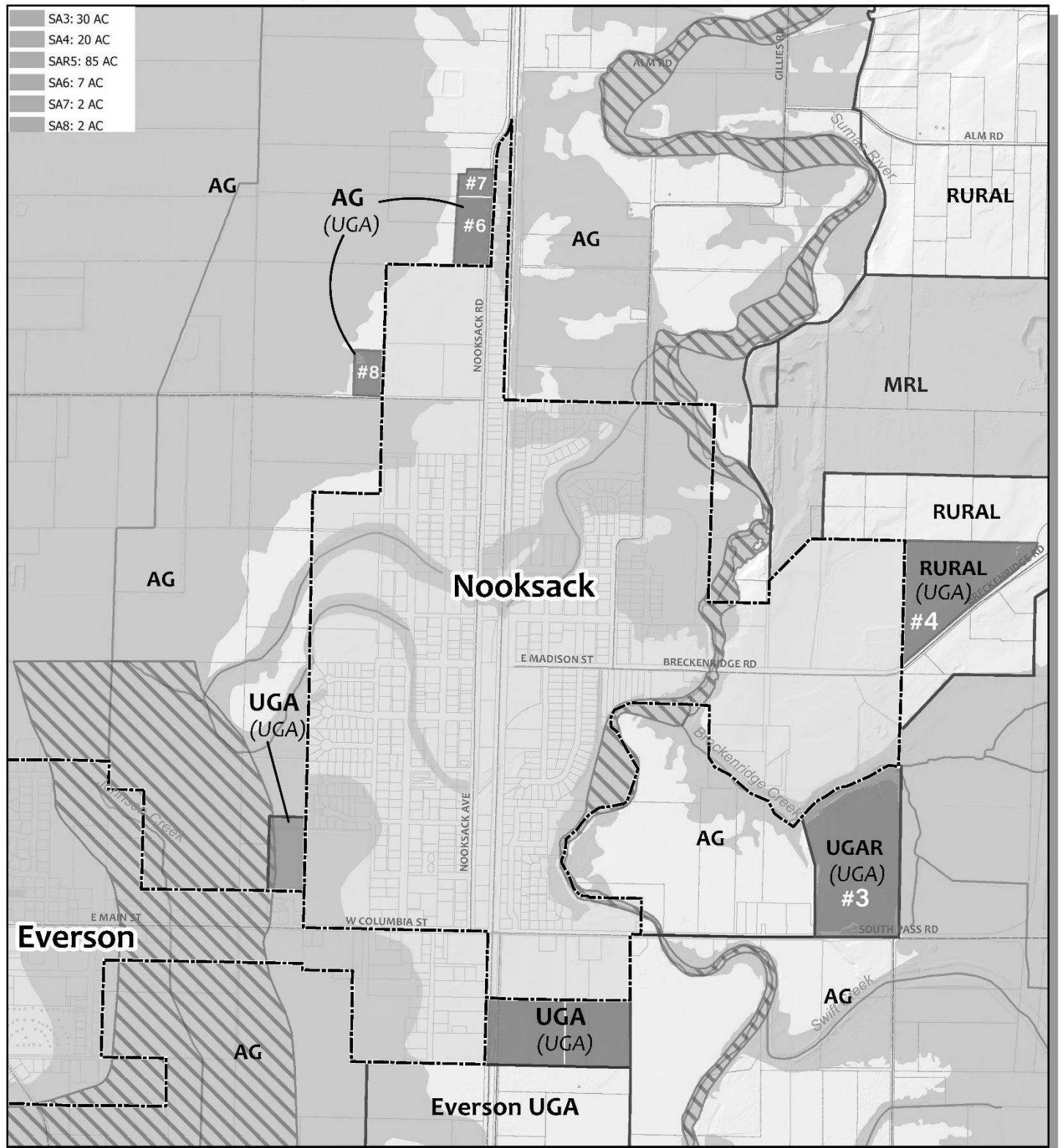
The City of Nooksack is proposing five changes to its Urban Growth Area (UGA) and UGA Reserve boundaries. See map that follows. These changes include:

1. **Nooksack Study Area 3:** Shifting an approximately 30-acre area from UGA Reserve to full UGA status. This area is located north of S. Pass Rd., to the east of Nooksack and immediately south of Breckenridge Creek (existing City limits). This area has a future zoning designation of Light Industrial, and its location separated from residential areas would avoid potential zoning conflicts while supporting opportunities for increased job growth.
2. **Nooksack Study Area 4:** Adding an approximately 20-acre area to the UGA that is located immediately east of the City along Breckenridge Road. This area is currently zoned Rural and contains numerous rural-residential parcels. A future City zoning designation of R-8600 is proposed for this area to support urban infill development in this area that is in close proximity to the Nooksack

Elementary School. If deemed appropriate by the County, the current County zoning (applicable prior to annexation) could be changed to UR-4.

3. **Nooksack Study Area 6:** Adding an approximately 7-acre portion of two larger Agriculturally zoned properties located adjacent to the state highway (SR 9), outside the 100-year floodplain, and immediately north of the 29-acre Light Industrial area that was annexed into the City in 2023. This area would have a future zoning designation of Commercial or, alternatively, could expand the adjacent Light Industrial zone.
4. **Nooksack Study Area 7:** Adding an approximately 2-acre area adjacent to the state highway at the north end of the City that is outside the 100-year floodplain. Although zoned Agriculture in the County, this small area contains two one-acre parcels that include residences already served through the City's water system. These parcels would have a future zoning designation of Residential to support limited opportunities for residential in-fill development.
5. **Nooksack Study Area 8:** Adding an approximately 2-acre portion of a larger Agriculturally zoned property that is located outside the 100-year floodplain, north of Tom Road and immediately west of the current City limits. This small area is currently occupied by former agricultural structures and impervious surfaces. The owner has requested the addition of this area to accommodate the relocation of a local church that has outgrown its current location.

In addition, the City is proposing to retain both its southern UGA and southwestern UGA that were added to the Nooksack UGA in 2016.



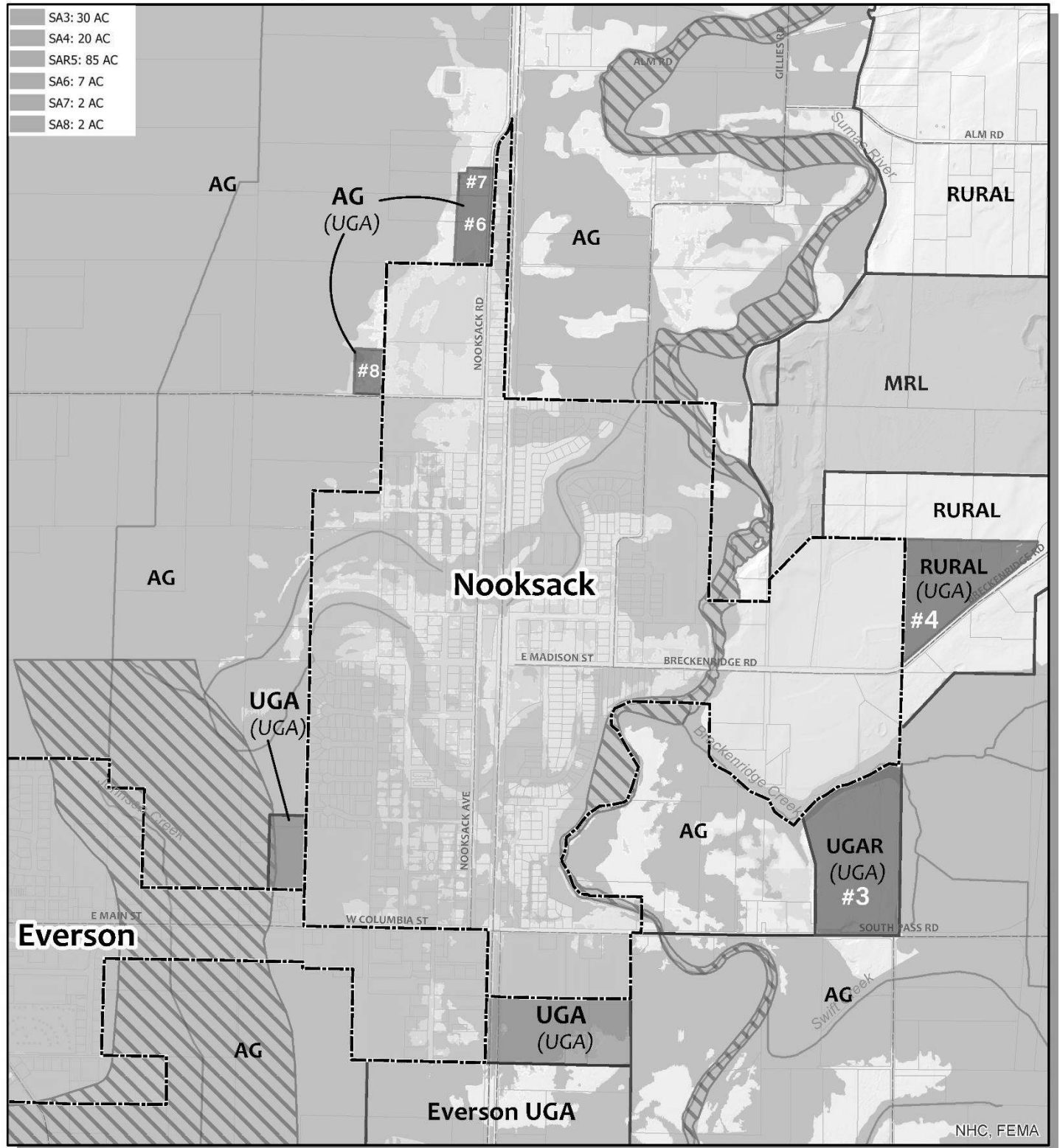
- Nooksack Urban Growth Area

- City of Nooksack
- Proposed Urban Growth Area
- Proposed Urban Growth Area Reserve
- Comprehensive Plan Designations (Proposed in **()**, Current in **bold**)
- Effective Floodway
- Effective Flood Zone
- Net change in AG designation - 11 ac. to UGA/UGAR

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- Nooksack Urban Growth Area

- City of Nooksack
- Draft Floodway (2024-2025)
- Draft SFHA (2024-2025)
- Proposed Urban Growth Area
- Draft SFHA (2024-2025)
- Proposed Urban Growth Area Reserve
- Nookack 1p75x 100 Year Flood
- Comprehensive Plan Designations (Proposed in **()**, Current in **bold**)
- Net change in AG designation - 11 ac. to UGA/UGAR

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VI. Land Capacity Analysis Overview

A land capacity analysis compares the proposed growth allocations to the capacity of the UGA to accommodate growth. The Land Capacity Analysis is an important tool for sizing UGAs. Land capacity analysis results for the 2025 City Proposal, based upon proposed UGA densities and boundaries, are shown below.

Table 6. Proposed UGA - Population Land Capacity Analysis Results		
1	Population Growth Capacity of Proposed UGA	1,669
2	Population Growth Allocation Proposed	995
3	Surplus (Deficit)	674

Table 7. Proposed UGA – Housing Land Capacity Analysis Results

Income Band (AMI)	Aggregated Housing Needs	Total Capacity of Proposed UGA	Surplus (Deficit)
0-80%	289	295	6
80-120%	56	91	35
120+%	88	204	116
Total	433	590	157

NOTE: AMI means "Area Median Income"

The current LCA shows adequate housing capacity (small surpluses) to accommodate housing for both the low-income and moderate-income bands.

Table 8. Proposed UGA - Commercial/Industrial Land Capacity Analysis Results		
1	Employment Growth Capacity of Proposed UGA	202
2	Employment Growth Allocation Proposed	232
3	Surplus (Deficit)	(30)

The current LCA shows a relatively small deficit of capacity for employment. The City will be looking at options for increasing overall employment capacity to address this small deficit of capacity.

VII. Capital Facility Planning

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

Water: The City previously prepared a Water System Plan (WSP) that was approved by the Washington Department of Health in 2013. The City is currently preparing a water system plan update that addresses anticipated growth through 2045. Although not yet finalized, the WSP update shows that the City will have adequate capacity to serve planned growth. It is anticipated that the City will adopt the WSP prior to the end of 2025, and the Washington Department of Health will approve the WSP in 2026.

Sewer: The City prepared a General Sewer Plan (GSP) that was approved by the Washington Department of Ecology in 2012. The City is currently preparing a General Sewer Plan amendment to address all elements related to capital facilities planning required under the GMA. Although not yet finalized, the GSP amendment shows that the City will have adequate capacity to serve planned growth. It is anticipated that the City will adopt the WSP prior to the end of 2025.

Stormwater: The City is addressing capital facilities related to stormwater as part of the 2045 update of the comprehensive plan. Given that new developments are required to fully address associated needs for construction of stormwater management facilities, the City anticipates that adequate facilities will be available to serve planned growth.

Fire Protection: Whatcom County Fire Protection District 1 has begun preparation of a Draft Capital Facilities Plan. The City will continue to work with the District to ensure that the Plan will be completed and adopted prior to completion and adoption of the *2025-2045 Comprehensive Plan Update*.

Schools: The Nooksack Valley School District has prepared and adopted a capital facilities plan that addresses anticipated growth in the district.

Transportation: Capital facilities related to the City's transportation system are addressed in the Transportation Element of the City's comprehensive plan. The City is in the process of updating this information as part of its 2025 comprehensive plan update process, including incorporating projects identified in the City's 6-year transportation improvement program (TIP) and establishing a multimodal level of service standard.

VIII. UGA Expansions into UGA Reserves (if applicable)

Is the City proposing to expand the UGA into the UGA Reserve?

Yes. The City is proposing to convert its current UGA Reserve to full UGA status.

Whatcom County Comprehensive Plan Chapter 2 contains criteria for transferring properties from the UGA Reserve to UGA. The general criteria are set forth below:

1. **Need for Land Capacity:** The need for additional land is necessary to accommodate projected urban growth, as documented in a land capacity analysis. A transfer from Urban Growth Area Reserve to Urban Growth Area will not be allowed which would provide capacity to accommodate substantially more than 20 years of urban growth. Additional consideration can be made regarding the mix of housing and employment opportunities that are required to serve the Urban Growth Area which could be accommodated in the Urban Growth Area Reserve and which cannot be accommodated within the Urban Growth Area.

City Comments:

The City's land capacity analysis shows a substantial deficit in employment capacity within the current City and UGA. In the City's 2016 comprehensive plan (and in earlier plans), the UGA Reserve was identified as having a future zoning designation of Light Industrial. With the addition of the UGA Reserve to the UGA, the LCA now shows a small deficit of capacity. The addition of this area is essential to opening up opportunities for increased opportunities for job growth in proximity to rural communities.

2. **Adequate Public Facilities and Services:** There are plans and capacity to serve the areas with urban governmental services as set forth in the Growth Management Act. There is no requirement to extend these services prior to transferring the area from Urban Growth Area Reserve to Urban Growth Area, but the Capital Facility Plans must document the capacity and plans to serve at urban levels of service within the 20-year planning period.

City Comments:

The City's capital facilities plans (Water System Plan and General Sewer Plan amendment) have incorporated expansion of the City's service areas to include the UGA Reserve. These plans generally show that adequate capacity is available to serve this area. It is generally anticipated that new developments will bear the majority of the costs to extend services to this area.

3. **Land Use Plans:** The respective city, or county for unincorporated Urban Growth Areas, has a comprehensive plan and land use regulations in place to allow for the transition from Urban Growth Area Reserve to Urban Growth Area. The respective jurisdiction will also have in place development regulations that ensure urban densities are achieved within the existing Urban Growth Area.

Urban Growth Area Reserves should be jointly planned between Whatcom County and the respective city.

City Comments:

The City's 2016 Comprehensive Plan established a future zoning designation for the UGA Reserve of Light Industrial. The designation is not intended to be changed as part of the 2025 update.

4. **Natural Resource Lands:** Expansion into the Urban Growth Area Reserve will not allow uses that are incompatible with adjoining natural resource lands unless mitigated through buffers, increased setbacks or other measures as necessary to maintain the productivity of the adjacent resource lands. If the expansion is into lands zoned Agricultural, the city and county shall have an interlocal agreement or regulations in place that implement a program that outlines the respective roles in protecting at least 100,000 acres of agricultural land in Whatcom County.

City Comments:

The City's current UGA Reserve was previously part of the City's UGA, but was placed in Reserve in 2009. As such, this area has already been removed from the County's quantification of its agricultural lands of long-term commercial significance. This area is currently in use for agriculture, and it is anticipated that such use will continue until the area is annexed and developed for urban purposes.

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

City Comments:

The City has land use regulations in place to protect elements of the environment located within the current UGA Reserve. These include critical areas regulations, shoreline management regulations, and flood damage prevention regulations.

6. **Open Space Corridors:** Continued provisions are made for open space corridors within and between Urban Growth Areas where not otherwise precluded by previous development patterns.

City Comments:

A natural open space corridor is in place along the northern boundary of the UGA Reserve that is associated with Breckenridge Creek. This includes a 150-foot stream buffer established through the City's Shoreline Management Master Program.

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

Nooksack Urban Area: An area east of the Sumas River and south of Breckenridge Creek has been designated as an Urban Growth Area Reserve. This area is currently used primarily for agricultural uses, and includes lands that may be flooded and exposed to Naturally Occurring Asbestos (NOA) from a natural landslide adjacent to Swift Creek. This area will be kept in reserve status until the County has determined that development will not expose future residents and employees to unacceptable risk from naturally occurring asbestos. The Urban Growth Area Reserve should be jointly planned with the city and county in conjunction with Urban Growth Area plans.

City Comments:

Since the adoption of both the city and county comprehensive plans in 2016, Whatcom County has made significant progress on reducing the amount of Swift Creek sediment released into the Sumas River. The City supports continuation of these efforts and would note the following three points:

- 1) The UGA Reserve is located well to the east of the Sumas River which is the main carrier of any sediments potentially impacted by NOA;
- 2) The UGA Reserve is predominantly situated on higher ground elevated above the 100-year floodplain. The main area that is within the floodplain is located within the 150-foot stream buffer along Breckenridge Creek. This substantial buffer would prohibit development within potentially hazardous areas and limit access to this area; and,
- 3) The City's future zoning designation of Light Industrial would avoid establishment of residential areas in proximity to any potential hazard area. In addition, the City is prepared to work with the County to plan for growth in this area that ensures safety for employees working in this area in the future.

IX. UGA Expansion in the Floodplain (if applicable)

Is the City proposing to expand the UGA into the floodplain?

Yes. the City's proposal to convert the UGA Reserve to full UGA status would include expansion into the floodplain of the Sumas River.

If expanding UGA into a floodplain, explain how the proposal meets the requirements of *RCW 36.70A.110(10)*.

City Comments:

RCW 36.70A.110(10) establishes limitations on UGA expansions into the 100-year floodplains of certain larger rivers, such as the Nooksack River. The above-referenced limitations do not apply to UGA expansions into the floodplain of the Sumas River based on its lower flow rate. In addition, floodplain areas within this proposed UGA are restricted from development

based on the 150-foot stream buffer adjacent to Breckenridge Creek within which such floodplain areas are located.

X. UGA Expansions into Resource Lands (if applicable)

Is the City proposing to expand the UGA or UGA Reserve into lands designated as Agriculture, Rural Forestry, Commercial Forestry, or Mineral Resource Lands on the Whatcom County Comprehensive Plan map?

Yes. The City's proposal is to expand the UGA into Agriculture Resource Lands.

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

City Comments:

Chapter 8 from the County comprehensive plan includes a number of goals and policies addressing conservation of the agricultural land base and criteria for designation of agricultural lands of long-term commercial significance. The City is proposing a very small (approximately 11-acre) expansion into lands currently zoned Agriculture; however, such a small expansion would not significantly impact the County's overall agricultural land base. It is also important to note that in 2016 when the City added approximately 35 acres of agricultural land to the UGA, the City also reduced its UGA Reserve by *over 80 acres*. The net effect of these two UGA modifications (2016 plus 2025 proposal) would still result in an *overall net increase* in the County's agricultural land base.

In addition, an evaluation of the proposed expansion areas based on the designation criteria for Agricultural natural resource land supports de-designation of these areas at this time. County designation criteria address a range of factors, such as soil types, taxation status, parcel size, availability of services and infrastructure, and proximity to urban areas. Although the proposed expansion areas do contain prime agricultural soils and some of these properties are in an open space taxation program, all of these areas are located in close proximity to the city of Nooksack, all have direct frontage onto major transportation routes, all have ready access to urban services available in Nooksack and Everson, all have close access to public utility infrastructure, and all of the parcel sizes are far less than the 40-acre size applicable to agricultural zoning. In fact, the average parcel size within the surrounding area is well below 40 acres.

More specifically, **Area 6** has direct frontage onto SR-9 (a T2 truck route) and has both public water and sewer facilities available across the highway. **Area 7** includes two small (1-acre), previously developed, residential parcels that also have frontage onto SR 9, and these parcels are already receiving their water supply through the City's water distribution system. Lastly, **Area 8** is a small portion of a larger agriculturally zoned property that has frontage

on Tom Road and availability of water service through the City's public system. This area is already unavailable for agricultural production because the land is largely occupied by existing agricultural structures and paved storage areas. This small area has been included in the Nooksack proposal at the request of the property owner, who also owns the adjacent parcels to the east within City limits) to allow relocation of his church that has outgrown its current location.

The small size of the proposed expansion into agricultural lands and consideration of the other factors discussed above support de-designation of these areas and addition to the Nooksack UGA. We would also note that none of the proposed expansion areas is mapped as being within the FEMA 100-year floodplain on the currently effective flood maps. Therefore, the level of risk associated with inclusion of these areas in the Nooksack UGA is very low.

XI. UGA Swap (if applicable)

Is the City proposing a UGA swap under the GMA?

No.

XII. Conclusions

The City of Nooksack is proposing limited expansion of its UGA to address current capacity deficits and increased opportunities for employment growth and affordable housing in response to demonstrated demand. The City's proposal primarily includes adding areas outside the 100-year floodplain that appropriate to designate for future urban development. Based on recent and ongoing increases in population, the City anticipates continuing to offer affordable housing options in a small town setting.