

Urban Growth Area Review

Cherry Point UGA / UGA Reserve Proposal

September 12, 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.

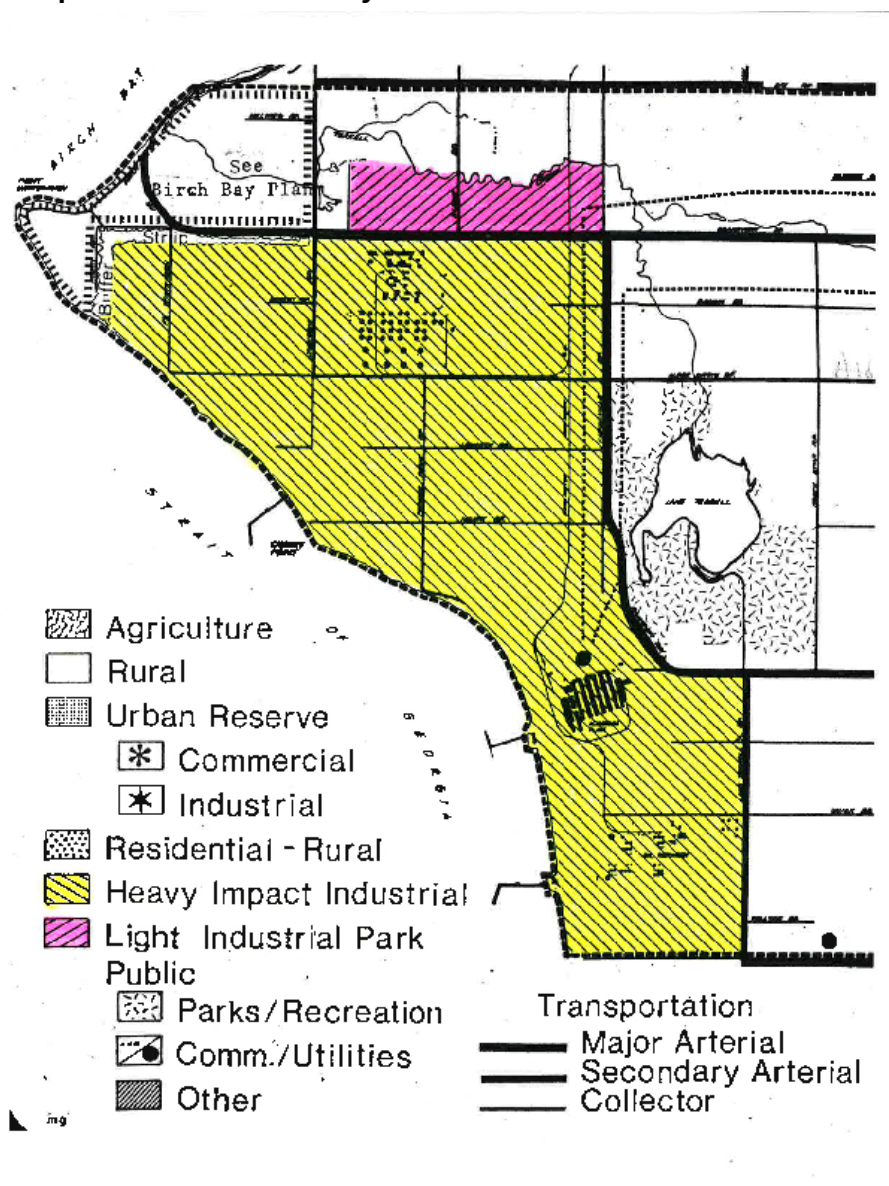
Existing interlocal agreements indicate that the County and cities will work together to develop proposed population and employment allocations to UGAs and review UGA boundaries. The County and cities are recommending UGA boundary proposals for their respective UGAs. Review of these proposals includes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

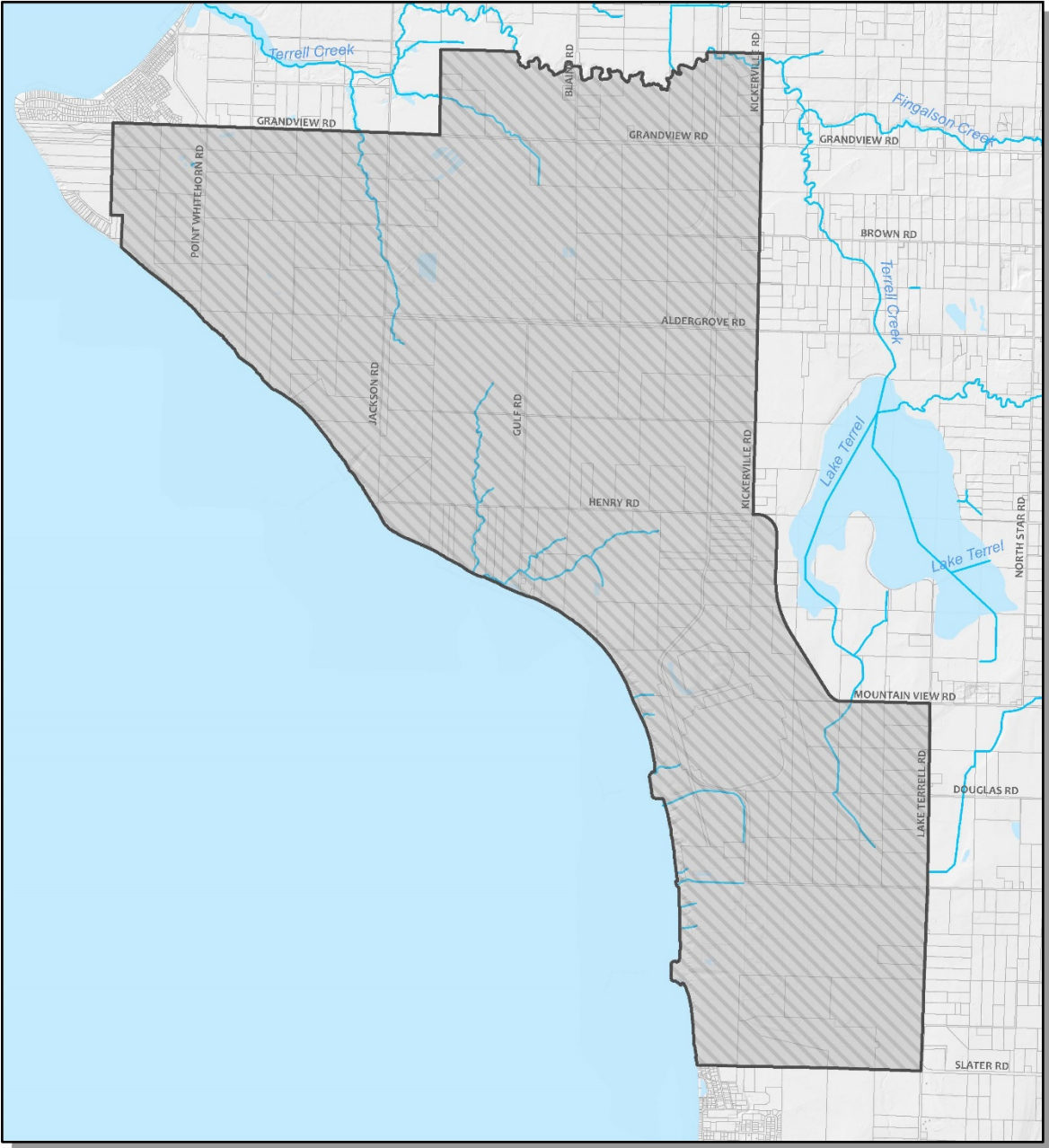
The Cherry Point UGA is approximately 11 square miles. The Cherry Point area is a Major/Port Industrial UGA with zoning that generally does not allow residential development.

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 existing boundaries of the Cherry Point UGA are shown below.



- Cherry Point Urban Growth Area

 Major Port/Industrial UGA

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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.

The Cherry Point UGA is not associated with a city and, therefore, Table 1 does not apply.

<i>Table 1. Permitted Densities in the City</i>		
Zoning Abbreviation	Zoning	Permitted Densities
N/A	N/A	N/A

County zoning designations in the UGA are shown in Table 2 below.

<i>Table 2. Permitted Densities in the UGA (outside the City)</i>		
Zoning Abbreviation	Zoning	Permitted Densities
HII	Heavy Impact Industrial	N/A
LII	Light Impact Industrial	N/A

IV. UGA Growth Allocation Proposal

This section compares population, housing and employment growth allocations in the 2025 County proposal to those in the non-binding multi-jurisdictional resolution approved by the County Council in March 2025 (Resolution 2025-011).

The proposed employment growth allocation for the Cherry Point UGA over the planning period is an additional 1,200 jobs. This allocation is consistent with the multi-jurisdictional resolution approved by the County Council in March 2025. Cherry Point is an industrial UGA and, therefore, does not have population or housing allocations.

Table 3. UGA Population Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	N/A
2	County Growth Allocation Proposal	N/A
3	Difference	N/A

The Cherry Point UGA does not have residential zoning and, therefore, Table 3 above does not apply.

Table 4. UGA Housing Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	N/A
2	County Growth Allocation Proposal	N/A
3	Difference	N/A

The Cherry Point UGA does not have residential zoning and, therefore, Table 4 above does not apply.

Table 5. UGA Employment Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	1,200
2	County Growth Allocation Proposal	1,200
3	Difference	0

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 total county-wide jobs in 2021 and was assigned this percentage for the Technical Report's middle growth allocation.

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).

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."

Comprehensive Plan Policy 2CC-1 is to:

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.

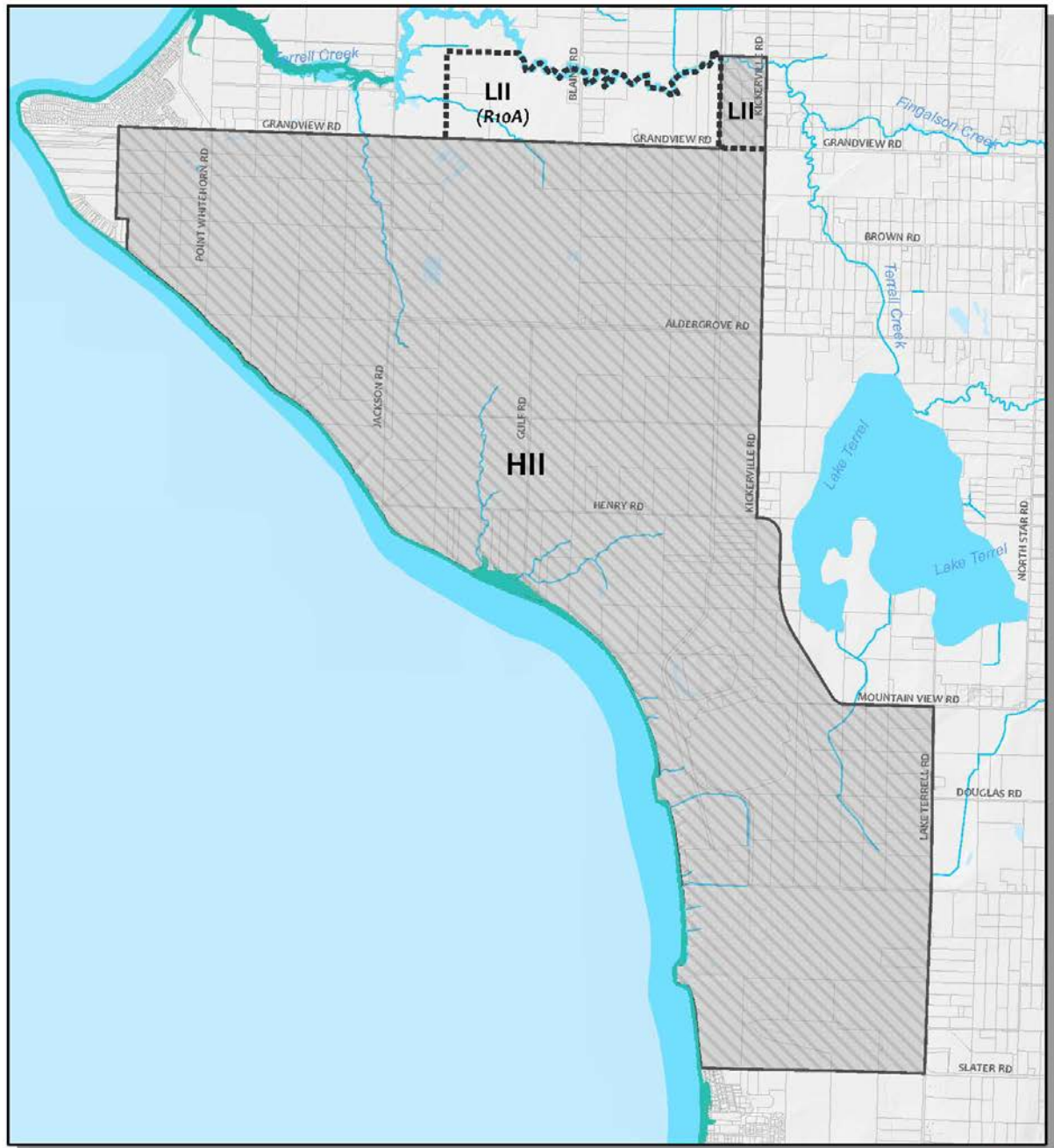
The Cherry Point area has long been utilized and recognized as an important industrial area in the County. In fact, the Cherry Point UGA had 7.1% of the county-wide industrial employment in 2021 (Technical Report, p 20). In order to support opportunities for industries to locate in the area and potential 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.

V. UGA / UGA Reserve Boundary Proposal

The Cherry Point proposal includes the following features:

UGA Boundary / Zoning Change: Re-designate parcels north of Grandview Road that have a conservation easement or protective covenant, totaling approximately 385 acres, from UGA to Rural on the Whatcom County Comprehensive Plan map. Rezone these parcels from Light Impact Industrial to Rural 1 dwelling/10 acres (R10A).

UGA Reserve: None proposed.



- Cherry Point Urban Growth Area

 Major Port/Industrial UGA - Remove parcels north of Grandview with Conservation Easements (Parcels proposed to be rezoned to R10A)

 Zoning Designations - Existing Zoning in BOLD
Proposed Zoning in Parentheses ()

 Effective Flood Zone  3.3 ft. Sea Level Rise
20 Year Storm



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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 County 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	N/A
2	Population Growth Allocation Proposed	N/A
3	Surplus (Deficit)	N/A

The Cherry Point UGA does not have residential zoning and, therefore, Table 6 above does not apply.

Table 7. Proposed UGA – Housing Land Capacity Analysis Results

Income Band (AMI)	Aggregated Housing Needs (housing units)	Total Capacity of Proposed UGA (includes pending development)	Surplus (Deficit)
0-80%	N/A	N/A	N / A
80-120%	N/A	N/A	N / A
120+ %	N/A	N/A	N / A
Total	N / A	N / A	N / A

NOTE: AMI means “Area Median Income”

The Cherry Point UGA does not have residential zoning and, therefore, Table 7 above does not apply.

Table 8. Proposed UGA - Commercial/Industrial Land Capacity Analysis Results		
1	Employment Growth Capacity of Proposed UGA	2,563
2	Employment Growth Allocation Proposed	1,200
3	Surplus (Deficit)	1,363

The land in the existing UGA can accommodate about 1,363 more jobs than allocated over the planning period. The land capacity for industrial jobs exceeds the proposed employment growth allocation. The industrial land capacity is sufficient to accommodate the proposed job growth allocation over the planning period (there is currently no commercial zoning in the Cherry Point UGA). Therefore, UGA boundary expansion is not needed to accommodate projected industrial growth.

VII. Capital Facility Planning

Special districts have undertaken the following capital facility planning efforts in order to plan for adequate public facilities and services in the UGA.

Water – Public Utility District (PUD) No. 1 of Whatcom County delivers industrial-grade water supplies to existing major industrial facilities at Cherry Point. The PUD No. 1 Comprehensive Drinking Water System Plan was updated in 2021/2022 (this plan focuses on the PUD's potable water systems). The PUD's General Manager indicated, in an email of August 27, 2025, that the PUD will have adequate water to serve industrial growth in the Cherry Point UGA over the next 20 years. The Birch Bay Water and Sewer District provides potable water service to the BP Cherry Point Refinery by agreement. The *Birch Bay Water and Sewer District Comprehensive Water System Plan* was approved by the District in 2019 and revised in 2020. Phillips 66 has a water system to treat industrial-grade water received from PUD No. 1 to meet their potable water needs.

Sewer – Birch Bay Water and Sewer District provides sewer service to the BP Cherry Point Refinery, in the northern portion of the UGA, by agreement. The *Birch Bay Water and Sewer District Comprehensive Sewer System Plan* was approved by the District in 2019 and revised in 2020. The Phillips 66 refinery has an on-site wastewater treatment system. New development in the UGA would either have to reach an agreement for extension of sewer or develop new on-site wastewater treatment systems.

Stormwater – The major industries at Cherry Point have "National Pollutant Discharge Elimination System" (NPDES) permits. According to the U.S. Environmental Protection Agency (EPA):

The Clean Water Act prohibits anybody from discharging "pollutants" through a "point source" into a "water of the United States" unless

they have an NPDES permit. The permit will contain limits on what you can discharge, monitoring and reporting requirements, and other provisions to ensure that the discharge does not hurt water quality or people's health. In essence, the permit translates general requirements of the Clean Water Act into specific provisions tailored to the operations of each person discharging pollutants ([EPA website](#)).

NPDES permits are designed (among other things) to prevent stormwater runoff from washing harmful pollutants into surface waters such as streams, rivers, lakes and coastal waters. These permits are issued in compliance with both the Federal Clean Water Act and the State of Washington Water Pollution Control Law (RCW 90.48).

The *Birch Bay Comprehensive Stormwater Plan* was approved in 2006 (Resolution 2006-070). This plan states:

. . . A portion of the Cherry Point Refinery facility operated by BP Corporation lies within the Upper Terrell Creek sub-basin. Portions of the Cherry Point Refinery, including on-site ponds, discharge through a permitted deep water outfall into the salt water and not to Terrell Creek...

Fire Protection – Fire District 7 serves the Cherry Point UGA. The *Whatcom County Fire District No. 7 Capital Facilities Plan* was approved by the District Commissioners in 2016. This plan states “. . . this financing plan will enable the District to provide urban levels of service in the City of Ferndale, Ferndale UGA and Cherry Point UGA . . .” (p. 28). Fire District 7 is currently in the process of updating their Capital Facilities Plan.

Schools – The Cherry Point UGA is within the Blaine and Ferndale School Districts. However, this is an industrial UGA that does not include residential zoning.

Transportation – Grandview (SR 548) and Slater roads, which are major east-west connectors between Cherry Point and Interstate-5, provide all-weather road access to Cherry Point. Transportation projects over the 20-year planning period will, as appropriate, be set forth in the Whatcom County Comprehensive Plan (Appendix E, 20-Year Capital Facilities Plan).

VIII. UGA Expansions into UGA Reserves (if applicable)

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

No.

IX. UGA Expansion in the Floodplain (if applicable)

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

No.

X. UGA Expansions into Resource Lands (if applicable)

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

No.

XI. UGA Swap (if applicable)

Is the County proposing a UGA swap under the GMA?

No.

XII. Conclusions

In summary, Whatcom County Planning and Development Services recommends an employment growth projection of 1,200 jobs for the Cherry Point UGA over the new planning period (2023-2045). This projection is consistent with the non-binding multi-jurisdictional resolution regarding preliminary population, housing and employment allocations (County Council Resolution 2025-011).

Proposed changes to the Comprehensive Plan and zoning are:

- Re-designating parcels north of Grandview Road that have a conservation easement or protective covenant, totaling approximately 385 acres, from UGA to Rural on the Whatcom County Comprehensive Plan map.
- Rezoning the parcels removed from the UGA from Light Impact Industrial to R10A.

The Cherry Point UGA proposal would provide land zoned to accommodate the projected employment growth over the planning period.