

Urban Growth Area Review

Birch Bay UGA/UGA Reserve Proposal

August 22, 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.

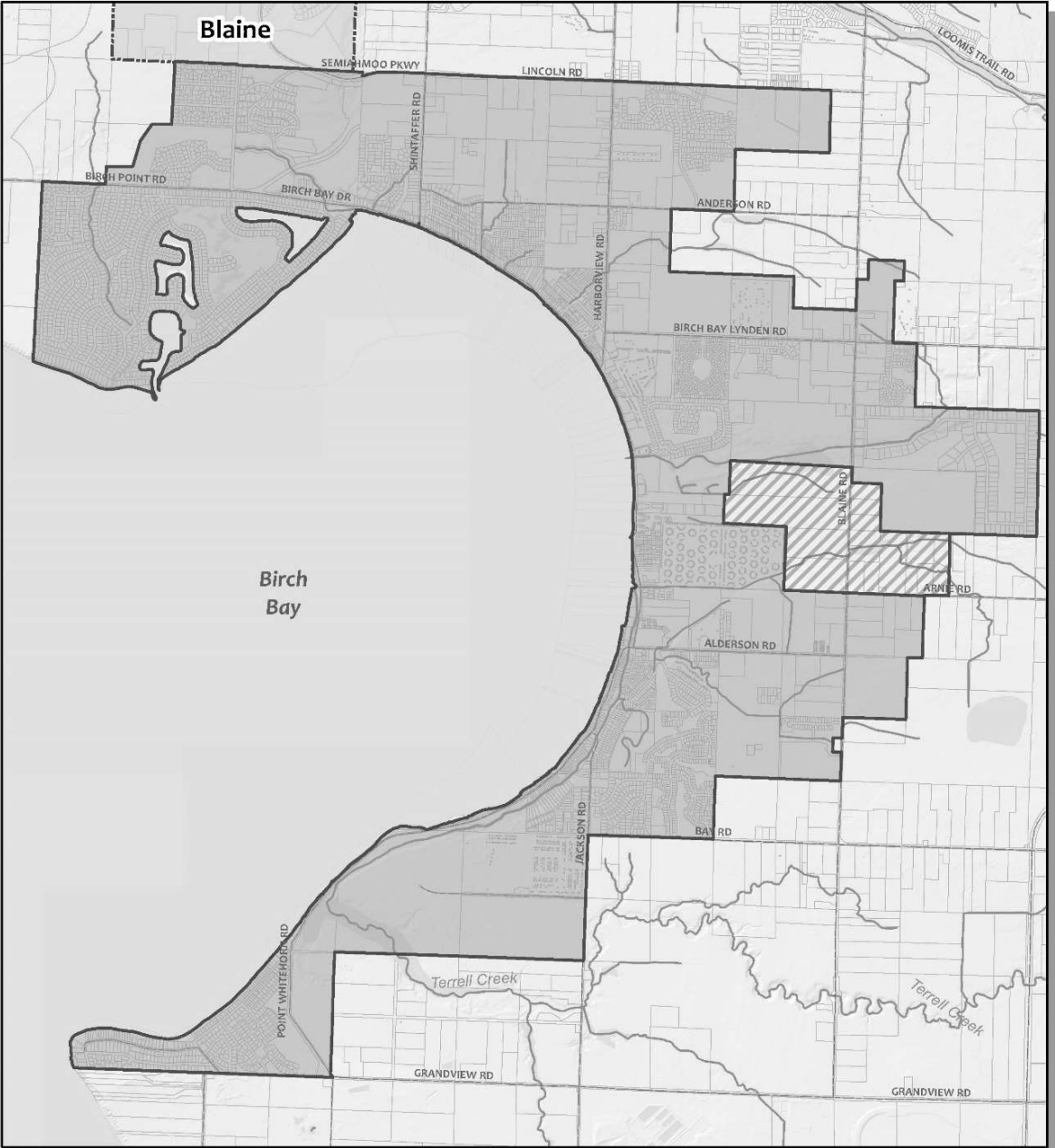
II. Birch Bay UGA Profile

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.

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



- Birch Bay Growth Area

-  City of Blaine
-  Urban Growth Area
-  Urban Growth Area Reserve

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0 0.25 0.5 1 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. Population within the current UGA boundaries for Census years, population growth, average annual growth rates, and growth shares 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. 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 Birch Bay UGA is not associated with a city and, therefore, Table 1 does not apply.

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

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

Table 2. Permitted Densities in the UGA (outside the City)		
Zoning Abbreviation	Zoning	Permitted Densities
NC	Neighborhood Commercial	No density specified in the zone
GC	General Commercial	Duplexes and multifamily dwellings not to exceed 18 dwelling units per gross acre (when public water and sewer are available) Residences on premises in a commercial structure: The overall residential density will not exceed 12 units per acre Hotels and motels shall not exceed a floor area ratio of .60
RC	Resort Commercial	Maximum gross density: 7 to 22 dwelling units/acre, if public water and sewer are available Minimum net density: 7 to 10 dwelling units/acre (WCC <u>20.64.260</u>), if public water and sewer are available Maximum gross density: 2 dwelling units/1 acre, if public water is available but not public sewer Maximum gross density: 1 dwelling unit/5 acres, if public water is not available
UR4	Urban Residential	Maximum gross density: 4 dwelling units/1 acre, if public water and sewer are available Minimum net density: 4 dwelling units/1 acre, if public water and sewer are available

		1 dwelling/10 acres, if public water sewer are not available
URM6	Urban Residential Medium Density	Maximum gross density: 6 dwelling units/acre and minimum net density: 6 dwelling units/acre, if public water and sewer are available. 1 dwelling/10 acres, if public water sewer are not available
URM24	Urban Residential Medium Density	Maximum gross density: 24 dwelling units/acre (with TDRs) and minimum net density: 10 dwelling units/acre, if public water and sewer are available 1 dwelling/10 acres, if public water and sewer are not available

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 growth allocations for the Birch Bay UGA over the planning period are an additional 2,662 people, an additional 1,051 housing units, and an additional 450 jobs. These allocations are consistent with the multi-jurisdictional resolution approved by the County Council in March 2025.

Table 3. UGA Population Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	2,662
2	County Growth Allocation Proposal	2,662
3	Difference	0

The Birch UGA had moderate growth from 1990-2000 (202 people per year) and relatively high growth from 2000-2010 (322 people per year). The Birch Bay UGA grew at a slower pace from 2010-2020 (131 people per year). 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 8,908 in 2023.

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.

Table 4. UGA Housing Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	1,051
2	County Growth Allocation Proposal	1,051
3	Difference	0

In order to identify the number of housing units needed for each jurisdiction, the State Department of Commerce developed the Housing for All Planning Tool (HAPT) spreadsheets for use by local jurisdictions (the County's consultant modified the tool to address UGAs and limitations on Rural housing under GMA). The overall countywide population figure is inserted in the HAPT, and it calculates the number of housing units that are needed at the various income bands (low, moderate, high income households) in each UGA and the Rural & Resource Lands outside UGAs. The housing units needed in the Birch Bay UGA, which were included in County Council Resolution 2025-011 (the Multi-jurisdictional Resolution), are shown above. The County's growth proposal is the same as Resolution 2025-011.

Table 5. UGA Employment Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	450
2	County Growth Allocation Proposal	450
3	Difference	0

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).

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:

. . . 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).

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).

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 a projection would also be substantially lower than the 545 jobs allocated to the Birch Bay UGA in the current Whatcom County Comprehensive Plan.

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.

V. UGA / UGA Reserve Boundary Proposal

The Birch Bay proposal includes the following features:

UGA Boundary: No change. The existing UGA is sufficient, with the zoning changes set forth below, to accommodate the allocated population, housing and employment growth for the planning period (2023-2045).

UGA Reserve: The Whatcom County Comprehensive Plan defines Urban Growth Area Reserves as:

Areas that are not yet suited for urban growth but are logical areas in which the urban area would likely grow beyond current growth allocations after being properly designated as an Urban Growth Area(p. 2-87).

The proposal includes adding two areas to the UGA Reserve.

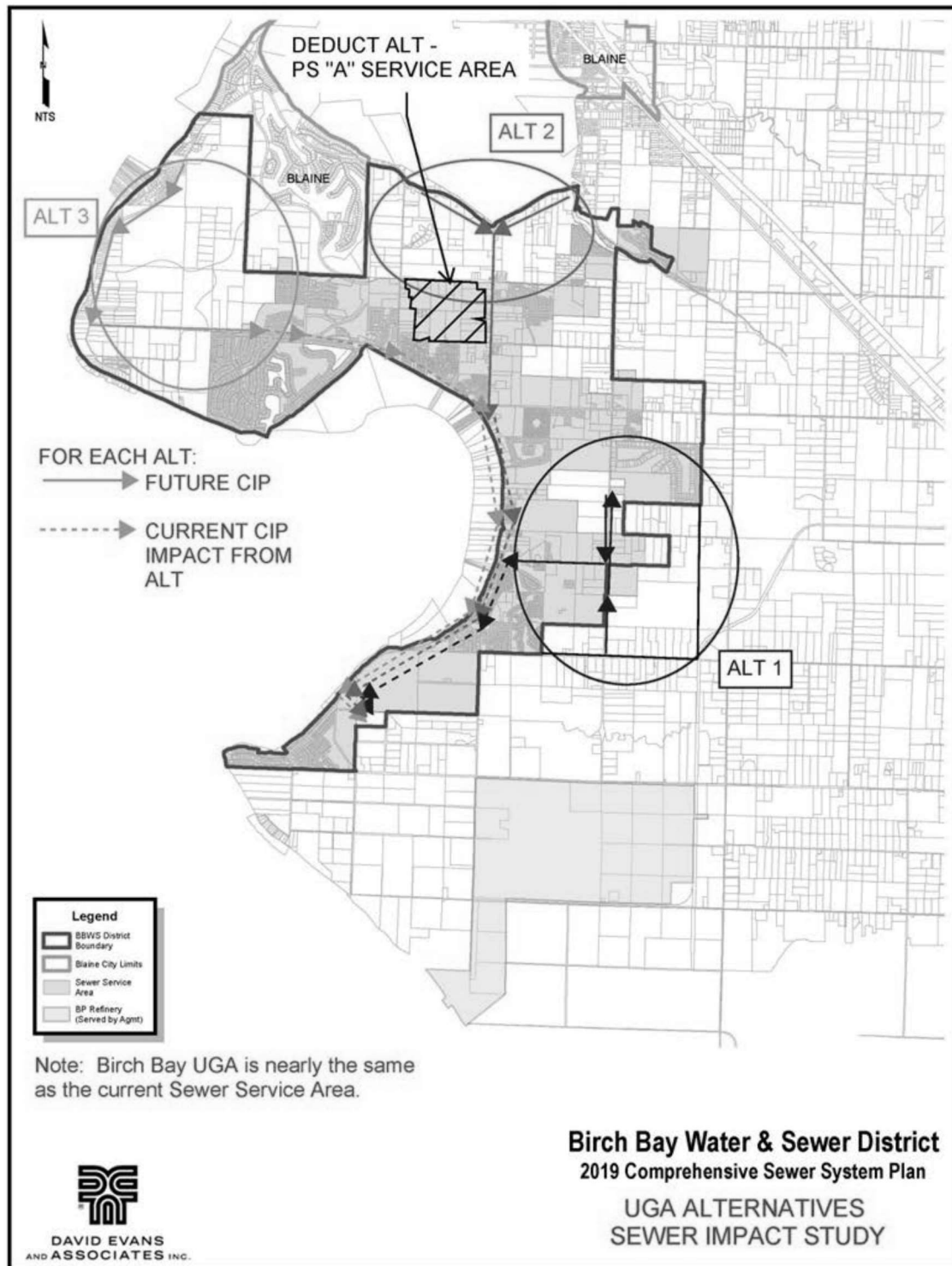
The first area, shown below, is bounded by Kickerville Rd. to the east and Arnie Rd. to the south. The area is adjacent to Double R Ranch. It is approximately 175 acres. The 3.3' sea-level rise scenario is shown in blue on the map below (areas inundated with 3.3' sea-level rise and a 20-year storm). There is a relatively small portion of this land (about 3 acres) within the modelled potential sea-level rise area.



The second area, shown below, is bounded by Bay Rd. to the South. Blaine Rd. runs through the area. The Bay Crest South subdivision is immediately to the west and Bay Horizon Park is to the north. This area is approximately 91 acres. This land is not within the 3.3' sea-level rise/20-year storm inundation area.



The Birch Bay Water and Sewer District (BBWSD) conducted a study to evaluate cost of providing public sewer to three alternative locations around the UGA, shown below as Alts 1, 2, and 3.



The District's study indicated that the "Alt 1" area was the least expensive to serve with sewer (UGA Study Summary, David Evans and Associates, April 18, 2025). The Birch Bay Community Advisory Committee (BBCAC) issued recommendations as follows:

" . . . In support of the objectives of the BBWSD, the Birch Bay Community Advisory Committee voted unanimously to support the inclusion of all land within the BBWSD boundaries identified in Alternative #1 to the proposed Birch Bay UGA . . ." (BBCAC email dated May 16, 2025).

The Growth Management Act, as interpreted by the State Growth Management Hearing Board, basically requires that proposed UGA expansions cannot result in oversized UGAs. They can accommodate 20 years of population, housing and employment growth – with only a little latitude for accommodating more. As indicated below, the County's land capacity analysis estimates that the Birch Bay UGA can accommodate the projected population, housing, and employment growth over the planning period. Therefore, UGA expansion is not being proposed at this time.

Taking both the Advisory Committee's recommendation and the GMA requirements about not oversizing UGAs into consideration, County Planning is recommending adding UGA Reserve in (and near) Birch Bay Water and Sewer District's "Alternative 1" area. UGA Reserves are areas that may be suitable for future inclusion in a UGA. Therefore, this designation would set the stage for considering adding these areas to the UGA in the years to come.

Zoning Text Amendments: The GMA requires that local comprehensive plans must make adequate provisions for existing and projected housing needs of all economic segments of the community, including lower and moderate incomes (RCW 36.70A(2)(d)). The State Legislature amended this statute in 2021 to strengthen the housing provisions with the passage of House Bill 1220. The UR4 zoning text would be amended to allow duplex, triplex, and fourplex development (would apply countywide). This would allow opportunity for housing to accommodate moderate income households in accordance with House Bill 1220.

Commercial Rezoning: The go-cart-track parcel on Birch Bay-Lynden Rd. and strips of land immediately to the north and east in the existing UGA (approximately 13 acres total) would be rezoned from Urban Residential Medium Density (URM6) to General Commercial (GC). This would recognize the existing land use and create a logical boundary between the URM6 and GC zones.

State Park Rezoning - Birch Bay State Park, approximately 187 acres, would be rezoned from Urban Residential Medium Density (URM6) to Recreation and Open Space (ROS). The purpose of the ROS zone is to implement the

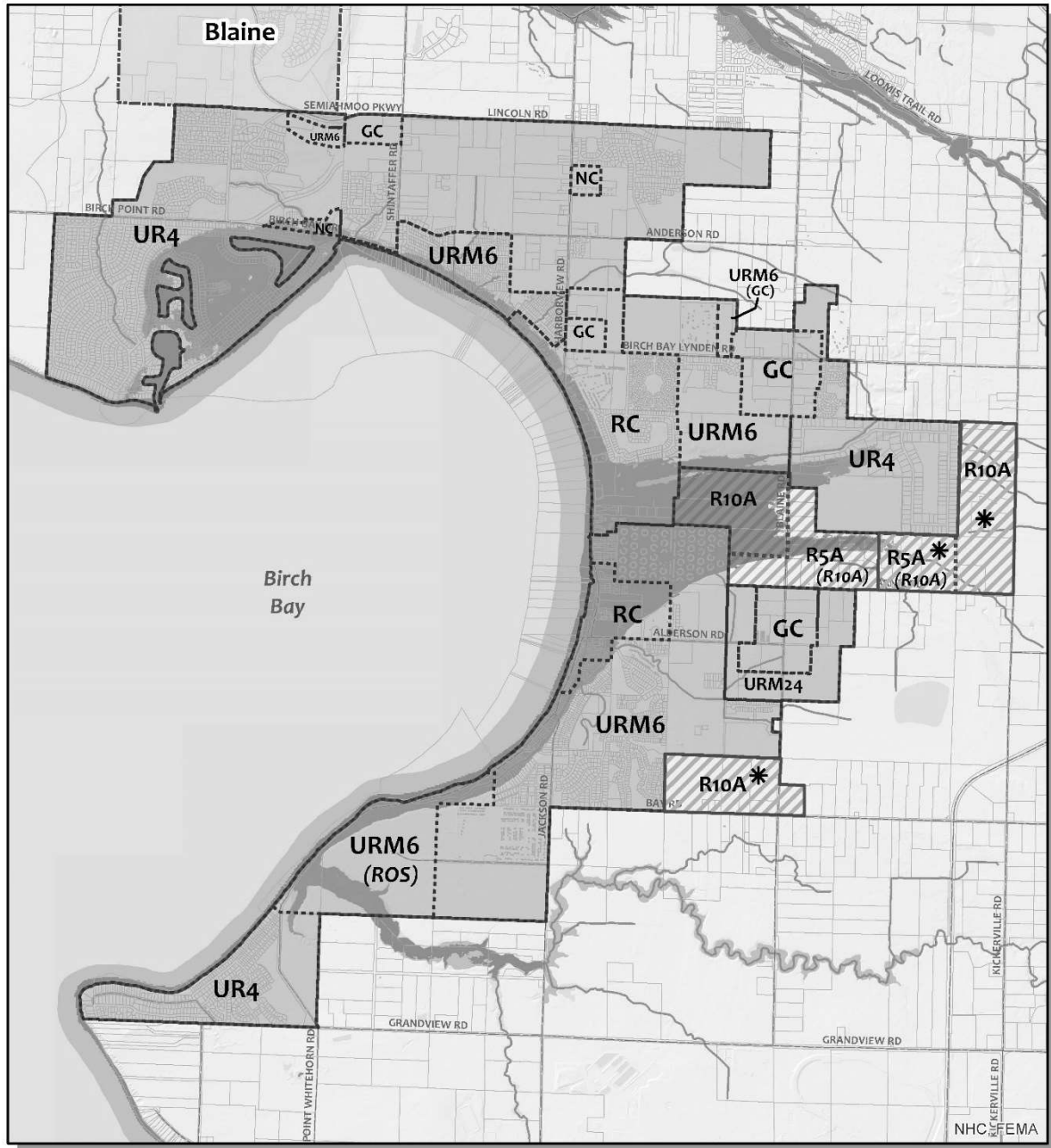
Comprehensive Plan by “. . . ensuring the continued public provision of a variety of services, optimizing public investments, conserving recreation and open space resources and uses, and promoting compatibility between public functions and surrounding land uses” (WCC 20.44.010). Given the long-standing use of the property as a public park, ROS zoning is more appropriate than the existing URM6 zone.

R5A to R10A Rezoning – Rezone approximately 100 acres in the existing UGA Reserve and about 55 acres in the proposed UGA Reserve from Rural 1 dwelling/5 acres (R5A) to Rural 1 dwelling/10 acres (R10A). The Whatcom County Comprehensive Plan states:

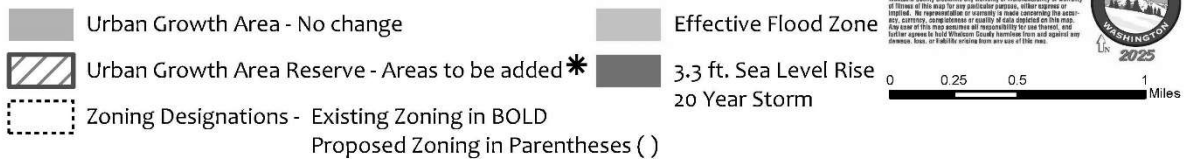
Upon establishing an Urban Growth Area Reserve, Whatcom County will establish land use controls intended to reserve the area for future urban densities and development by limiting the potential of the properties to be developed with incompatible uses, densities, or public facilities which would interfere with the likely expansion of urban development in the future. **Properties in these areas should generally have land use designations of no more than one unit per ten acres**, and uses such as agriculture, forestry, conservation, and low density residential development, may be encouraged provided that the continuation of such uses may not be a basis for preventing future expansion of the Urban Growth Area to the Urban Growth Area Reserve (pp. 2-81 and 2-82, bold added for emphasis).

Based upon the Comprehensive Plan language, the County is proposing to rezone land in the existing and proposed UGA Reserves from R5A to R10A.

The UGA/UGA Reserve map proposal, including proposed rezones, is below.



- Birch Bay Urban Growth Area



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	3,406
2	Population Growth Allocation Proposed	2,662
3	Surplus (Deficit)	744

The land in the existing UGA can accommodate about 744 more people than allocated over the planning period. The land capacity is sufficient to accommodate the proposed population growth allocation over the planning period. Therefore, no changes to the existing UGA boundary are needed to accommodate projected population growth.

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%	702	721	19
80-120%	136	425	289
120+%	213	1,211	998
Total	1,051	2,357	1,306

NOTE: AMI means "Area Median Income"

The land in the existing UGA can accommodate about 1,306 more dwelling units than allocated over the planning period. With the proposed zoning changes, the UGA can accommodate a variety of housing types to meet the needs of various income level households under House Bill 1220. The land capacity is sufficient to accommodate the proposed housing growth allocation over the planning period. Therefore, no changes to the existing UGA boundary are needed to accommodate projected housing growth.

Table 8. Proposed UGA - Commercial/Industrial Land Capacity Analysis Results		
1	Employment Growth Capacity of Proposed UGA	654
2	Employment Growth Allocation Proposed	450
3	Surplus (Deficit)	204

The land in the existing UGA can accommodate about 204 more jobs than allocated over the planning period. The land capacity for commercial jobs exceeds the proposed employment growth allocation. Therefore, the commercial land capacity is sufficient to accommodate the proposed job growth allocation over the planning period (there is currently no industrial zoning in the Birch Bay UGA). No changes to the existing UGA boundary are needed to accommodate projected commercial 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 – The Birch Bay Water and Sewer District provides water service to the Birch Bay UGA. The *Birch Bay Water and Sewer District Comprehensive Water System Plan* was approved by the District in 2019 and revised in 2020. The draft Coordinated Water System Plan (CWSP, May 2025) indicates the Birch Bay Water and Sewer District has an “unspecified” number of connections available for future growth (p. 3-16). The draft CWSP indicates:

For larger water systems, DOH [State Department of Health] will approve a water system plan and identify in Sentry that there is an unspecified number of authorized connections remaining. This action is usually taken for larger water systems and systems that are still preparing updates to water system plans through the planning process. In doing this, DOH has authorized the water system to manage how many connections can be served based on its own analysis (p. 3-11).

Whatcom County Comprehensive Plan Allocations for Special Districts by Growth Alternative (June 2025) projects 1,274 new dwelling units in the District over the planning period (2023-2045). The District’s service area includes the Birch Bay UGA, but also extends into Rural areas outside the UGA. New commercial development in Birch Bay’s commercial zones would also use an undetermined amount of water.

Population growth in the Birch Bay UGA has been slower than anticipated in the 2016 Whatcom County Comprehensive Plan. Because of this, the

projected total population at the end of the planning period in 2045 (11,570) is lower than the 2016 Comprehensive Plan's projection for 2036 (12,822).

The Birch Bay Water and Sewer District's General Manager, in a letter of May 30, 2025 commenting on the County's *Comprehensive Plan Update Draft Environmental Impact Statement* or EIS (April 2025), stated:

. . . Of the four growth planning alternatives, the District's current planning efforts appear sufficient to accommodate the No Action Alternative, Alternative 1, and Alternative 2. . .

. . . [the Draft EIS] suggests encouraging the District to update the Comprehensive Water System Plan and Comprehensive Sewer System Plan consistent with County growth projections through the 2045 planning horizon. The District fully supports this effort and has budgeted for a Comprehensive Plan update this year. However, the District wishes to note that it intends to update its plans following the finalization of the County's Comprehensive Plan Update. This approach will ensure alignment, avoid unnecessary costs from potentially duplicative revisions, and ensure consistency and efficiency in planning efforts (pp. 1 and 2).

The County's population, housing and employment projections in the County's UGA/UGA Reserve Proposal are the same as Draft EIS Alternative 2. There are no UGA expansions proposed, growth has been slower than previously anticipated, and the District intends to update their Comprehensive Water System Plan after the Comp Plan update is completed.

Sewer – The Birch Bay Water and Sewer District provides sewer service to the UGA. The *Birch Bay Water and Sewer District Comprehensive Sewer System Plan* was approved by the District in 2019 and revised in 2020.

Whatcom County Comprehensive Plan Allocations for Special Districts by Growth Alternative (June 2025) project 1,065 new dwelling units in the sewer service area over the planning period (2023-2045). New commercial uses in Birch Bay's commercial zones would also use an undetermined amount of sewer capacity.

As mentioned in the water section above, the County's population, housing and employment projections in the County's UGA/UGA Proposal are the same as Draft EIS Alternative 2 (which the District's current planning efforts appear sufficient to accommodate). There are no UGA expansions proposed, growth has been slower than previously anticipated, and the District intends to update their Comprehensive Water System Plan after the County Comp Plan update is completed.

Stormwater – The *Birch Bay Comprehensive Stormwater Plan* was approved in 2006 (Resolution 2006-070). The following plans were subsequently completed:

- The *Birch Bay Central North Subwatershed Master Plan* in 2013;
- The *Birch Bay Central South Subwatershed Master Plan* in 2015;
- The *Birch Point, Terrell Creek Urban Area, and Point Whitehorn Subwatershed Master Plan* in 2016; and
- The Birch Point Subwatershed Drainage Study Report in 2023.

These subwatershed master plans were prepared for Whatcom County Public Works Department Stormwater Division and Birch Bay Watershed and Aquatic Resources Management District (BBWARM) and will function as updates to the 2006 Stormwater Plan. These plans include identification of stormwater problems and potential solutions.

Many of the capital facilities projects constructed by the BBWARM District are within the Urban Growth Area of Birch Bay. Extensive planning and analysis have been done within the BBWARM District boundary to evaluate stormwater impacts, frequently flooded areas and to identify where stormwater infrastructure is failing or non-existent. Much of the proposed development within the Birch Bay UGA currently lacks adequate infrastructure to accommodate increased storm water volumes. These areas are identified in the Birch Bay Comprehensive Stormwater Plan, subwatershed master plans and special studies. These plans assist the BBWARM District in determining which projects are priorities and which order they should be constructed, they also have been adopted by Whatcom County as local policies to supplement the State Environmental Policy Act and to provide recent analysis to aid in specific project proposal reviews within the BBWARM District.

Local concern over increasing intensity of storm events, such as the major storms of November 2021 coupled with the information from the new sea-level rise study, creates a heightened need for collaborative planning efforts. Based on the studies conducted by BBWARM, urban development within the Birch Bay Urban Growth Area and the City of Blaine will require improvements to several inadequate drainage systems within the BBWARM District. Fees for the required drainage improvements have been paid by the BBWARM District rate payers. Costs for infrastructure projects has steadily increased resulting in fee rate increases starting in 2025. Even with fee increases, design and construction costs limit the number of projects that can be done annually. To keep pace with need, future system improvements required by development should receive financial assistance from developments that receive a benefit from the upgraded infrastructure.

Fire Protection – North Whatcom Fire & Rescue provides fire protection and emergency medical services to the majority of the UGA. The *North Whatcom Fire & Rescue and Fire District # 4 Capital Facilities Plan* was approved by the District Commissioners in 2016. This Plan states:

The Fire District intends to request mitigation fees pursuant to RCW 82.02.020 (voluntary agreements) and/or RCW 43.21C.060 (SEPA mitigation) from developers to partially finance planned capital facilities needed to serve new growth. However, these mechanisms would not capture the incremental impacts to Fire/EMS services that smaller developments might cause over time. For example, they would not apply to construction of a new single-family residence on an existing lot. Whatcom County and the City of Blaine currently do not have fire impact fee ordinances that would allow collection of impact fees for both larger and smaller developments pursuant to RCW 82.02.050 -.100. The Fire Districts encourage the County and the City of Blaine to adopt fire impact fee ordinances. (p. 12).

Fire District 7 serves the portion of the UGA south of Bay Rd. The *Whatcom County Fire District No. 7 Capital Facilities Plan* was approved by the District Commissioners in 2016. The area south of Bay Rd. primarily consists of developed land, parkland, a common area tract for a subdivision, and a residentially zoned parcel owned by BP.

Schools – The Blaine School District serves the majority of the UGA. The *Blaine School District Capital Facilities Plan* was approved by the District in 2024. The Plan shows that, between 2014 and 2024, the total population of the District increased by about 18%. However, during this same time-frame, total student enrollment dropped by about 9% (pages 4 and 5). The District projects modest student enrollment growth through the end of the planning period (2045). The District's Capital Facilities Plan show adequate classroom capacity to accommodate projected enrollment through 2045 (p. 10). The Ferndale School District serves a relatively small area on the eastern edge of the UGA.

Transportation – Blaine Rd. (SR 548) runs from the City of Blaine south through the UGA and connects with Grandview Rd. (also SR 548), which provides access to I-5. Birch Bay-Lynden Rd. also provides access from Birch Bay to I-5. Birch Bay Dr. runs along the Bay and provides access to recreational opportunities, condos, RV parks and businesses located along the water. According to the County website, the Birch Bay Drive & Pedestrian Project (the berm) was completed in 2021. This project:

. . . restores the natural shoreline, protects the roadway from storm damage, and supports pedestrian safety with a separated berm that runs from the mouth of Terrell Creek (Lora Lane) to Cedar Avenue approximately 1.58 miles in length along the beach. . .

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 a population growth projection of 2,662, a housing growth projection of 1,051, and an employment growth projection of 450 jobs for the Birch Bay UGA over the new planning period (2023-2045). These projections are consistent with the non-binding multi-jurisdictional resolution regarding preliminary population, housing and employment allocations (County Council Resolution 2025-011).

The Birch Bay UGA boundary would not change. Proposed changes to the Comprehensive Plan and zoning are:

- Two new UGA Reserves, totaling 265 acres, would be designated.
- The UR4 zoning text would be amended to allow duplex, triplex, and fourplex development (this would apply countywide).
- Approximately 13 acres on the north side of Birch Bay-Lynden Rd. would be rezoned from Urban Residential Medium Density (URM6) to General Commercial (GC) to recognize the existing land use and create a logical boundary between the URM6 and GC zones.
- Birch Bay State Park, approximately 187 acres, would be rezoned from Urban Residential Medium Density (URM6) to Recreation and Open Space (ROS).
- A total of approximately 155 acres in the existing UGA Reserve and the proposed UGA Reserve would be rezoned from Rural 1 dwelling/5 acres (R5A) to Rural 1 dwelling/10 acres (R10A). This would be consistent with the Comprehensive Plan language relating to UGA Reserves.

The Birch Bay UGA proposal would provide land zoned to accommodate the projection population, housing and employment growth over the planning period. It would also accommodate housing to serve lower, moderate, and higher income levels.