

Urban Growth Area Review

City of Nooksack UGA Proposal

I. Introduction

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 are undertaking a joint planning process to allocate population and employment growth, review permitted densities, and review UGA boundaries. The joint planning process includes a number of steps, including:

- Approval of interlocal agreements (2012).
- Preliminary city population and employment growth proposals (2013).
- County Planning Commission review of preliminary city population and employment growth proposals (2013-2014).
- City and County approval of non-binding multi-jurisdictional resolutions regarding preliminary population and employment allocations (2014).
- Draft Environmental Impact Statement (2015).
- City UGA boundary proposals (2015).
- Final Environmental Impact Statement (2015).
- County Planning Commission review (2015).
- County Council and City Council approval of comprehensive plans (2016).

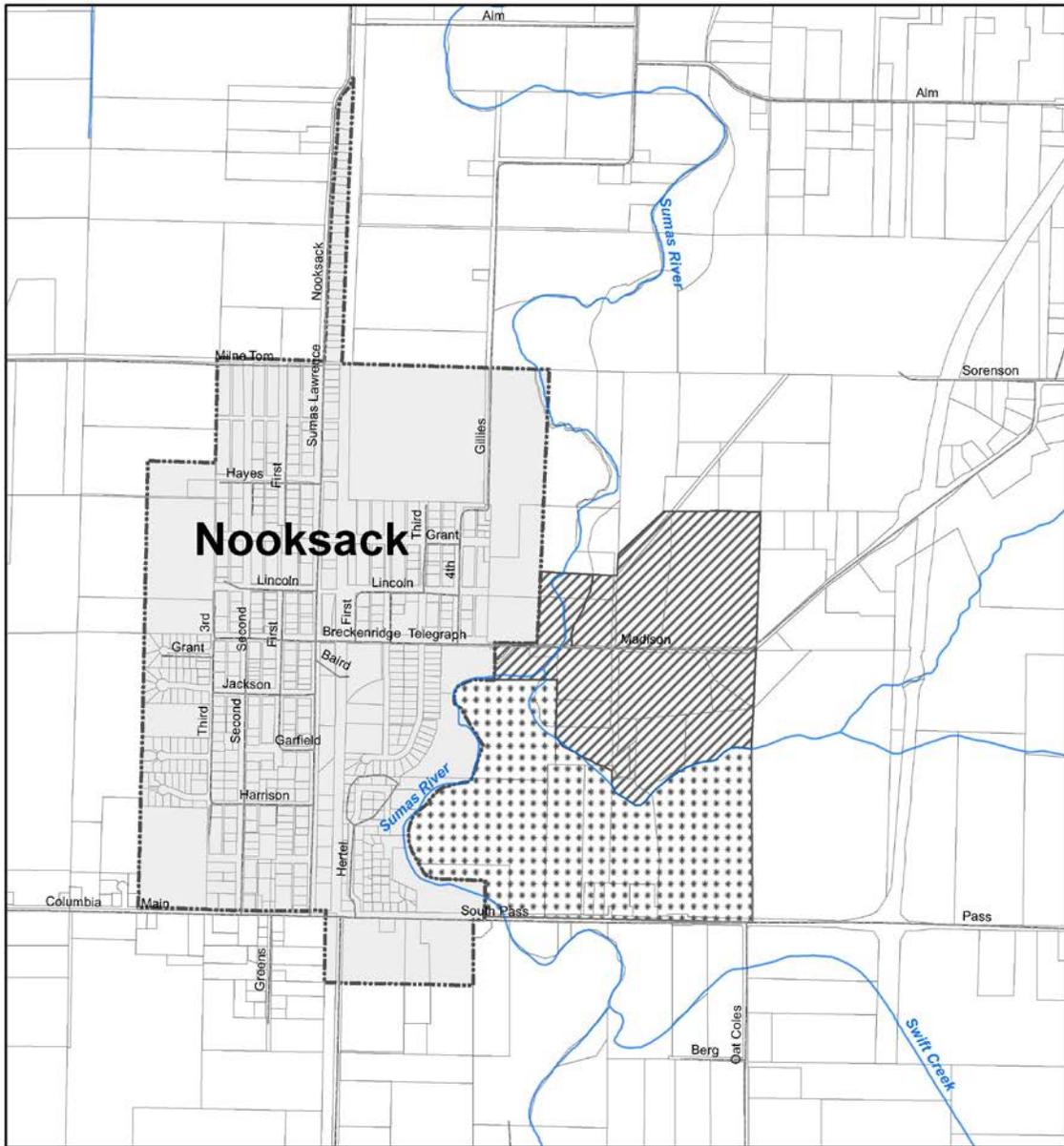
UGAs must include areas and densities sufficient to accommodate the projected urban growth for the 20-year planning period (RCW 36.70A.130 (3)), which extends through 2036. However, cities and the County are not required to plan for the future based solely upon past trends. Local government goals and policies, public input, 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 have recommended 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, which must be completed by June 2016 (RCW 36.70A.130).

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, 2015 the population of Nooksack was 1,460. The current City limits includes an area of approximately 435 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 Urban Growth Area

-  City Limits
-  Urban Growth Area
-  Urban Growth Area Reserve

October 2013

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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 . . . shall review . . . its designated 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 District	Minimum lot size of 9,600 square feet, which equates to a maximum of 4.5 units per acre.
R-8600	Residential-8600 Sub-District	Minimum lot size of 8,600 square feet, which equates to a maximum of 5.1 units per acre.

Table 2. Permitted Densities in the UGA (outside the City)

Zoning Abbreviation	Zoning	Permitted Densities
UR4	Urban Residential	4 dwellings/acre, if public water & sewer are available 1 dwelling/10 acres, if public water & sewer are not available Note: The City has a policy of not extending water and sewer services outside City limits until the area has been annexed into the City.
AG	Agriculture	1 dwelling/40 acres Note: Areas outside City limits that are zoned Agriculture by the County would be rezoned upon annexation to allow urban uses and urban densities.

IV. UGA Growth Allocation Proposal

This section of the proposal compares population and employment growth allocations in the 2015 City proposal to those in the non-binding, multi-jurisdictional resolutions approved by the County and all cities in 2014.

Nooksack 2015 Proposal: The City’s proposed population and employment growth allocations have been reduced from those included in the non-binding multi-jurisdictional resolutions approved by the County and all cities in 2014.

Table 3. UGA Population Allocation Proposal		
1	Multi-jurisdictional Resolution Growth Allocation (2014)	1,035
2	City Proposal (2015)	990
3	Difference	-45

The City’s population growth allocation proposal has been reduced to be more in line with the population growth capacity available in the City’s proposed UGA. The City’s population growth proposal is between the BERK Medium and BERK High projections. The City’s population growth proposal also reflects the City’s plan to increase residential densities through the planning period from 4.2 to 4.4 dwelling units per net developable acre. In April 2015 the Nooksack City Council took the first step toward achieving this density increase by establishing a Residential-8600 sub-district within which the minimum lot size for a single-family residence has been reduced from 9,600 to 8,600 square feet.

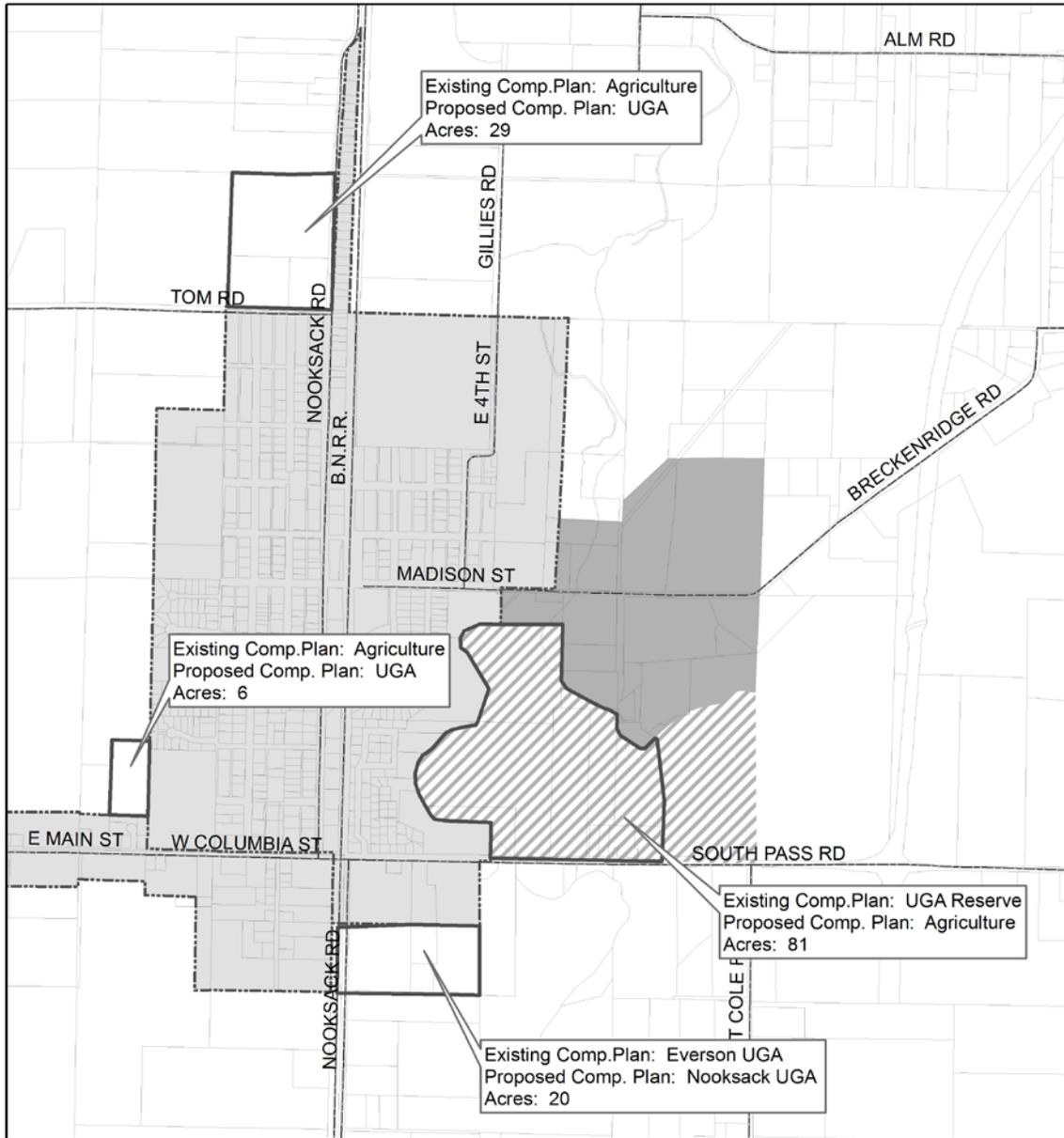
Table 4. UGA Employment Allocation Proposal		
1	Multi-jurisdictional Resolution Growth Allocation (2014)	290
2	City Proposal (2015)	115
3	Difference	-175

The City’s employment growth allocation proposal has been reduced to be more in line with the employment growth capacity available in the City’s proposed UGA. The City’s employment growth proposal is consistent with the BERK high projection.

V. UGA Boundary Proposal

The City of Nooksack is proposing four changes to its urban growth area (UGA) and UGA Reserve boundaries. See map that follows. These changes include:

1. Shifting an approximately 920-acre area containing two split-jurisdiction parcels (majorities already within Nooksack City limits) from Everson UGA to Nooksack UGA. This change would allow all parts of these properties to be developed for urban uses within the City of Nooksack rather than in two jurisdictions. Based on input received from the County Planning Commission at its meeting held on July 23, 2015, this area was increased from nine acres to a full twenty acres to avoid creating an irregular outer boundary. Three parcels and the abutting state highway and BNSF railroad rights-of-way were added.
2. Adding an approximately 6-acre parcel to the UGA that is owned by the Nooksack Valley School District and that is planned for future ball fields. This area is located just west of and abutting the Nooksack Valley Middle School and would be shifted from unincorporated County (Agriculture zoning) to Nooksack UGA.
3. Adding an approximately 4229-acre area to the UGA to accommodate future industrial growth. Based on input received from the County Planning Commission, the size of this area was reduced from the City's initial proposal that included 42 acres. This reduction avoids impacts to parcels historically included in the Sytsma dairy, avoids the splitting of parcels, and eliminates potential future impacts related to utilization of or access to remaining Sytsma parcels. This area is located north of Tom Road adjacent to the State Highway where City utilities are already in place. The area would be shifted from unincorporated County (Agriculture zoning) to Nooksack UGA.
4. Removing an approximately 81-acre area located north of S. Pass Road from the Nooksack UGA Reserve in exchange for the 48-35 acres of UGA expansion described above. In 2009, this area was shifted from UGA to UGA Reserve status by the County due to concerns related to potential impacts to the area from naturally occurring asbestos contained in sediments from Swift Creek. The area is currently zoned Agriculture in the County and would no longer be designated UGA Reserve.



-Nooksack Urban Growth Area Proposal

Legend

- Incorporated City
- Urban Growth Area
- Urban Growth Area Reserve
- Proposed Changes to UGA

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Discussion regarding Nooksack UGA Boundary Proposal

Split-jurisdiction Parcels

The two split-jurisdiction parcels addressed in the Nooksack proposal are owned by members of the Silves family. The major portions of these parcels are already within Nooksack City limits. The City of Nooksack is supportive of the family's desire to have their parcels entirely within the City of Nooksack so that they can be efficiently developed to accommodate future residential housing. Based on input received from the County Planning Commission, three parcels and the abutting state highway and BNSF railroad rights-of-way were added to the two split-jurisdiction parcels to increase the area proposed to be shifted from the Everson UGA to the Nooksack UGA from nine acres to a full twenty-acre rectangle. This change would avoid creating an irregular outer boundary and is supported by the City of Everson.

School District Property

The Nooksack Valley Middle School is within Nooksack City limits. The 6-acre parcel located adjacent to the Nooksack Valley Middle School that is addressed in the Nooksack UGA Proposal has been owned by the School District for over fourteen years. The School District Superintendent has provided a letter in support of adding this property to the Nooksack UGA so that additional ball fields can be developed to meet the school's growing demand. The School District has indicated that it will soon be in a position to move forward with plans to expand their existing recreational facilities at the Middle School. Development of ball fields is not permitted under the current County (Agricultural) zoning, but will be allowed once the property has been annexed into Nooksack. See attached letter from the School District Superintendent.

The School District property is located in the 100-year floodplain. See discussion below regarding limitations on UGA expansions into floodplains. Also, this property is currently designated by the County as an agricultural land of long-term commercial significance. See discussion below regarding de-designation of agricultural lands.

Area North of Tom Road adjacent to the State Highway

The ~~4229~~-acre area located north of Tom Road is immediately adjacent to the State Highway (SR 9), which is a major regional transportation corridor. This area is adjacent to the Nooksack City limits on two sides. Portions of this area are already served by City water, and the City already has major water and sewer transmission lines in place along the State Highway. Expansion of the UGA into this area is needed to provide land for future industrial development. The need for this expansion is also due in part to the County's action in 2009 to re-designate a portion of the Nooksack UGA planned for future industrial development to UGA Reserve status due to concerns related to potential impacts from Swift Creek sediments containing naturally occurring asbestos. The areas that the County placed into Reserve cannot be shifted back into UGA status until the naturally occurring asbestos issue has been adequately addressed. At the current time, the Nooksack land supply contains only one small property that is available for

industrial development. Expansion of the UGA north of Tom Road would open up opportunities for industrial development that would help support the local job market and the local economy.

A small portion of the proposed area north of Tom Road is located in the 100-year floodplain. See discussion below regarding limitations on UGA expansions into floodplains. Also, this area is currently designated by the County as agricultural lands of long-term commercial significance. See discussion below regarding de-designation of agricultural lands.

Removal of UGA Reserve

The area proposed to be removed from the Nooksack UGA Reserve includes that portion of the UGA Reserve that is immediately adjacent to the Sumas River, which is the water body that carries sediment from Swift Creek containing naturally occurring asbestos. Although the City has argued in the past that these areas could be developed safely through the use of cluster residential zoning, the City is now willing to exchange a portion of the potentially impacted area for UGA that is not constrained in this way. Based on the mapping developed by the County, the area proposed to be removed from the UGA Reserve is the area immediately adjacent to the Sumas River and most likely to be impacted by Swift Creek sediment.

It is important to emphasize that the removal of land from the Nooksack UGA Reserve is being proposed in combination with and in exchange for the above-described UGA expansions. Therefore, in the event the exchange described herein is found not to be acceptable to the County, then the proposed removal of land from the Nooksack UGA Reserve should be considered withdrawn. Under such a circumstance, the City of Nooksack would continue to work with the County to pursue a comprehensive solution to the Swift Creek sediment issue that would allow the Nooksack UGA Reserve to be safely developed.

Like the areas proposed for UGA expansion, the area proposed to be removed from the Nooksack UGA Reserve is also zoned Agriculture by the County; however, these lands are not currently considered agricultural lands of long-term commercial significance. Upon removal from the UGA Reserve, these areas would be re-designated as agricultural lands of long-term commercial significance. See discussion below regarding de-designation of agricultural lands.

UGA Expansion into Floodplain

RCW 36.70A.110(8) limits UGA expansions into certain FEMA-designated, 100-year floodplains except under certain conditions. This state law is important because both of the Nooksack proposed UGA expansion areas include land within the 100-year floodplain of the Nooksack River overflow corridor, which is subject to the limitations under this state law. One of the exceptions to not allowing UGA expansions into floodplains is established under subsection (b)(iii), which states that the limitations do not apply to "Urban growth area expansions where:"

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

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

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

The entire 6-acre property owned by the School District is within the floodplain; however, the District's plan to utilize this property entirely for outdoor recreation is consistent with the uses allowed under subsection (b)(iii)(C)(I), above. The District Superintendent has provided a letter in which he indicates the District's willingness to work with the City and County to place the requisite restrictions on the future use of the property at the appropriate time. It is anticipated that the restrictions on future use of the property would be in place and recorded with the County Auditor prior to the property being formally added to the Nooksack UGA.

~~Small portions along the western edge~~ A small portion in the northwest corner of the area north of Tom Road proposed to be added to the Nooksack UGA ~~are~~ is mapped by FEMA as being within the 100-year floodplain. Consistent with uses allowed under RCW 36.70A.110(8), subsection (b)(iii), the City anticipates that ~~these~~ this limited ~~areas~~ area would most appropriately be utilized for future stormwater facilities or environmental restoration. The property owner has indicated a willingness to work with the City in this regard. In turn, the City will work with the property owner and the County to ensure that the extinguishing of development rights and limitations on future use are in place at the appropriate time prior to formal expansion of the Nooksack UGA into this area.

De-designation of Agricultural Lands

This section of the Nooksack Proposal addresses consistency with County goals related to maintaining the agricultural land base and with state requirements under the Growth Management Act pertaining to the de-designation of agricultural lands of long-term commercial significance. In this regard, decisions by the State Growth Management Hearings Board have also been considered.

County Agricultural Land Base

Whatcom County has a goal of maintaining an agricultural land base of 100,000 acres. The Nooksack proposal includes the addition of 81 acres to the agricultural land base (removing agriculturally zoned land from the UGA Reserve) in exchange for a reduction of ~~48~~ 35 acres from the agricultural land base (adding agricultural land to the UGA). While the area to be added to the UGA is currently included in the County agricultural land base, the area to be removed from the UGA Reserve is not

and would, upon removal from the UGA Reserve, be re-designated as agricultural lands of long-term commercial significance and be added to the County's agricultural land base. In terms of gross acreage, the Nooksack proposal will result in a net increase in the agricultural land base and, therefore, is consistent with the County goal.

Based on review of soils information developed by the USDA, Natural Resource Conservation Service, it appears that both the area to be removed from and the area to be added to the agricultural land base contain prime agricultural soils. However, it also appears that some of the soils in the area to be added to the agricultural land base are not as productive as some in the area to be removed. To account for the differential soil qualities, the Nooksack proposal includes more land to be added to the agricultural land base than to be removed. The Nooksack proposal includes over 4.672.3 acres added to the agricultural land base for every 1 acre removed. To account for the fact that portions of the area proposed to be added back to the agricultural land base are occupied by streams and riparian areas where agricultural activities are not possible, the gross acreage to be added to the land base could be reduced by seven acres. The resultant net acreage still provides a ratio of over 4.52.0 acres added to the land base for every 1 acre removed.

It should be noted that the area proposed to be added to the agricultural land base has a long history of being utilized for agriculture. Much of the land is currently planted with potatoes, but for many years this land was utilized to produce raspberries. The area to be removed from the agricultural land base has been used primarily to produce corn and grass silage. The Nooksack proposed exchange of agricultural lands maintains the County's agricultural land base in terms of both quantity and quality.

GMA De-designation of Agricultural Lands

The Growth Management Act (GMA) does not provide strict standards that apply to the de-designation of agricultural lands of long-term commercial significance (ALLTCS). Rather, guidance is provided regarding factors that should be considered when designating ALLTCS. It then follows that when considering the de-designation of ALLTCS one would re-examine the designation factors to determine if, on balance, a change in designation is warranted. WAC 365-190-050(3) states that: "Lands should be considered for designation as agricultural resource lands based on three factors:

- (a) The land is not already characterized by urban growth.
- (b) The land is used or capable of being used for agricultural production.
- (c) The land has long-term commercial significance for agriculture.

On this subject, the State Growth Management Hearings Board [Karpinski, Clark County Natural Resources Council and Futurewise v. Clark County, Case No. 07-2-0027] has similarly held that the "three prongs" to consider regarding the designation/de-designation of ALLTCS, as restated by the Court of Appeals, are:

1. A determination of whether the land is characterized by "urban growth".
2. A determination of the commercial productivity of the land or the land's capability of being commercially productive.
3. A determination of the "long-term commercial significance" for agricultural production of the parcels.

Factor #1: Not already characterized by urban growth. Pursuant to the RCW 36.70A.030(19), "urban growth" refers to "growth that makes intensive use of land for the location of buildings, structures, and impermeable surfaces to such a degree as to be incompatible with the primary use of land for the production of food, other agricultural products, or fiber" Although the area north of Tom Road proposed to be added to the Nooksack UGA is bordered by two major roadways and although several parcels within the area already receive public water by way of the City of Nooksack water system, the area itself does not contain urban growth, but rather contains a combination of agricultural and rural residential growth. However, the first of the criteria from the GMA refers to land that is "not already characterized by urban growth." The definition cited above goes on to define "characterized by urban growth" as follows: "land having urban growth located on it, or to land located in relationship to an area with urban growth on it as to be appropriate for urban growth." As stated previously, the area proposed to be added to the UGA abuts the City of Nooksack on two sides. In addition, this area is immediately adjacent to the State Highway, public utilities, and a fully developed residential area within the City that is referred to as Nooksack North. Based on its location in relationship to these developed areas, the proposed expansion area is already characterized by urban growth and is, therefore, deemed to be appropriate for urban growth based on this criterion.

Factor #2: Used for commercial production. The area north of Tom Road to be added to the UGA is used for commercial production.

Factor #3: Long-term commercial significance for agriculture. To determine whether an area has long-term commercial significance, WAC 365-90-050(3)(c) identifies the following nonexclusive criteria to consider:

- (i) The classification of prime and unique farmland soils as mapped by the Natural Resources Conservation Service;
- (ii) The availability of public facilities, including roads used in transporting agricultural products;
- (iii) Tax status, including whether lands are enrolled under the current use tax assessment under chapter 84.34 RCW and whether the optional public benefit rating system is used locally, and whether there is the ability to purchase or transfer land development rights;
- (iv) The availability of public services;
- (v) Relationship or proximity to urban growth areas;
- (vi) Predominant parcel size;
- (vii) Land use settlement patterns and their compatibility with agricultural practices;
- (viii) Intensity of nearby land uses;

- (ix) History of land development permits issued nearby;
- (x) Land values under alternative uses; and
- (xi) Proximity to markets.

Of the above criteria, the area north of Tom Road does contain prime farmland soils, is located in proximity to a roadway used in transporting agricultural products, is enrolled in a current use tax program, includes parcels ranging in size from ~~less than an acre up~~four to seventeen acres, and is located in proximity to markets. However, the area is located adjacent to a major utility corridor within which the City of Nooksack already has water and sewer transmission lines in place that have capacity available. The area is located immediately adjacent to the City where public facilities and services are available, and the ~~predominant average~~ parcel size in the area is below ~~five-ten~~ acres. The adjacency of the proposed area to the City, in combination with the presence of available utilities, will lead to further urban development adjacent to this area, which will likely increase incompatibilities between agricultural practices and urban uses. In addition, the City's proposal to establish a future industrial area at this location will serve as a buffer between agricultural areas and planned residential areas within the City, thereby reducing future incompatibilities. In addition, there is a long history of the City issuing residential building permits for the area within the City immediately across the highway from the proposed expansion area, and land values for the alternative use (industrial development) would be more than double the land values for agricultural uses. On balance, the City does not see the area north of Tom Road as having long-term commercial significance for agriculture due to the adjacency to the City, the existing pattern of intensive residential development, the location on the State Highway, and the presence of public infrastructure immediately adjacent to the site. In this regard, the City's determination that the area does not have long-term commercial significance is not based solely on the area's proximity to the City or the potential for increased land values, but is also based on consideration of the other factors noted above. Such a determination is consistent with the finding of the State Hearings Board in the above-referenced case.

Based on review of the three prongs established in the GMA and as considered by the Growth Hearings Board, the area north of Tom Road proposed to be added to the Nooksack UGA only meets one out of the three criteria for designation as agricultural land of long-term commercial significance. Therefore, de-designation of this area would be consistent with requirements under the GMA.

The 6-acre School District parcel proposed to be added to the Nooksack UGA similarly only meets one out of the three designation criteria given its small parcel size and location immediately adjacent to the Nooksack Valley Middle School and developed residential areas within the cities of Everson and Nooksack.

Priority Order for Expanding an Urban Growth Area

RCW 365-196-310(4)(c)(iii) establishes the priority order for adding land to a UGA and states the following: "Lands should be included in the urban growth area in the following priority order:

- (A) Existing incorporated areas;
- (B) Land that is already characterized by urban growth and has adequate public facilities and services;
- (C) Land already characterized by urban growth, but requiring additional public facilities and urban services; and
- (D) Lands adjacent to the above, but not meeting those criteria.

As presented in the previous section, the areas proposed to be added to the Nooksack UGA fall into the second of these four priorities in that the land is already characterized by urban growth and has adequate public facilities and services.

Designating Industrial Lands

The area north of Tom Road that the City is proposing to add to the UGA has been identified as a future industrial area. RCW 365-196-310(4)(c)(iv) establishes that when designating a UGA intended for industrial use, cities and counties should consult with the local economic development agency and consider factors such as:

- (A) Rail access;
- (B) Highway access;
- (C) Large parcel size;
- (D) Location along major electrical transmission lines;
- (E) Location along pipelines;
- (F) Location near or adjacent to ports and commercial navigation routes;
- (G) Availability of needed infrastructure; or
- (H) Absence of surrounding incompatible uses.

The proposed industrial site meets nearly all of the above factors. Rail access is available at a siding located in Nooksack just one-quarter mile to the south. The area is located on the State Highway (SR 9) and on Tom Road, which is part of the regional transportation system designated by the County Metropolitan Planning Organization (facilitated through the Whatcom Council of Governments). The ~~4229~~-acre area is owned by two property owners and includes ~~several large~~~~three~~ parcels. Three-phase power is available from Puget Sound Energy that already has transmission lines in place along the Highway. The City already has water and sewer transmission lines in place that have available capacity. And finally, the location north of Tom Road and west of the State Highway would allow these roadways to provide a buffer between future industrial uses and residential areas within the current City limits. The proposed area is also almost entirely outside the 100-year floodplain and does not appear to contain any other environmental constraints.

The City has opened up discussions with the Port of Bellingham regarding the proposed industrial site. Thus far the response from the Port has been quite positive and supportive. The City sees the proposed area as being very well suited to future industrial development, which will support both the local economy and the local job base.

UGA Expansions into Resource Lands

RCW 365-196-310(4)(c)(v) establishes that before a UGA can be expanded into a designated resource land, the county must conclude that the land no longer meets the applicable designation criteria. The City has presented information in support of the conclusion that the areas proposed to be added to the Nooksack UGA no longer meet the designation criteria for agricultural lands of long-term commercial significance. In addition, based on the limitations posed by Swift Creek sediment, surrounding floodplains and adjacent resource lands, the City has concluded that no other option is available for expanding the Nooksack UGA. Finally, the City has proposed removing 81 acres of agricultural land from the UGA Reserve in exchange for the addition of ~~48~~35 acres to the UGA.

Open Space Corridors

The City of Everson is located adjacent to and contiguous with the City of Nooksack. The two towns have been adjacent to one another since the incorporation of Everson in 1929. The Nooksack River overflow corridor and floodway create a natural open space corridor between Everson and Nooksack. In addition, the Nooksack Valley Middle School and its associated ball fields provide additional open space between the developed portions of the two cities.

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 2015 City Proposal are shown below, first in relation to the existing UGA boundaries and second in relation to the proposed UGA boundaries.

In 2014, preliminary land capacity analysis results were developed that compared the capacity of the Nooksack UGA to the population and employment growth allocations included in the multi-jurisdictional resolution. Those preliminary results showed the following:

- The existing Nooksack UGA had a deficit of 122 in terms of population growth capacity; and
- The existing Nooksack UGA had a deficit of 228 in terms of employment growth capacity.

To address the above deficits, the City is proposing to increase residential densities and reduce its proposed allocations of both population and employment growth. These changes are reflected in Tables 5 and 6 and are shown in relation to the existing UGA. Tables 7 and 8 incorporate the above proposed changes and present land capacity analysis results in relation to the City's proposed UGA.

Existing UGA

Table 5. Existing UGA - Residential Land Capacity Analysis Results		
1	Population Growth Capacity of Existing UGA	956
2	Population Growth Allocation Proposed	990
3	Surplus (Deficit)	(34)

Based on the City's proposed population growth allocation and increased residential densities, the current Nooksack UGA does not have sufficient capacity to accommodate the proposed population growth. This result reflects the City's proposal to increase residential densities and reduce its population growth allocation.

Table 6. Existing UGA - Commercial/Industrial Land Capacity Analysis Results		
1	Employment Growth Capacity of Existing UGA	62
2	Employment Growth Allocation Proposed	115
3	Surplus (Deficit)	(53)

Based on the City's proposed employment growth allocation, the current Nooksack UGA does not have sufficient capacity to accommodate the proposed employment growth. This result reflects the City's proposal to reduce its employment growth allocation.

Proposed UGA

Table 7. Proposed UGA - Residential Land Capacity Analysis Results		
1	Population Growth Capacity of Proposed UGA	988 1,001
2	Population Growth Allocation Proposed	990
3	Surplus (Deficit)	(2) 11

Based on the City's proposed population growth allocation, the proposed Nooksack UGA contains sufficient capacity to accommodate planned growth with a very small deficit surplus.

Table 8. Proposed UGA - Commercial/Industrial Land Capacity Analysis Results		
1	Employment Growth Capacity of Proposed UGA	114 106
2	Employment Growth Allocation Proposed	115
3	Surplus (Deficit)	(1)

Based on the City’s proposed employment growth allocation, the proposed Nooksack UGA contains sufficient capacity to accommodate planned growth with a ~~very~~ small deficit.

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 prepared a Water System Plan (WSP) that was approved by the Washington Department of Health in 2013. The 2013 WSP showed that the City had sufficient capacity to accommodate anticipated growth through 2031. The City is currently preparing a water system plan update that addresses anticipated growth through 2036. Information from the water system plan update will be incorporated into the 2016 comprehensive plan update process.

Sewer – The City prepared a General Sewer Plan that was approved by the Washington Department of Ecology in 2012. That plan showed that the City had capacity to accommodate planned growth through 2036. The City is currently preparing an addendum to the General Sewer Plan to address all elements related to capital facilities planning required under the GMA. Information from the General Sewer Plan and Addendum will be incorporated into the 2016 update of the Capital Facilities Element of the City’s comprehensive plan.

Stormwater – The City will address capital facilities related to stormwater as part of the 2036 update of the comprehensive plan.

Fire Protection – Whatcom County Fire Protection District 1 has prepared a Draft Capital Facilities Plan, which it is understood will be adopted prior to completion of the County’s 2016 comprehensive plan update process.

Schools – It is anticipated that the Nooksack Valley School District will prepare a capital facilities plan prior to June 2016.

Transportation – Capital facilities related to the City’s transportation system are addressed in the Transportation Element of the City’s comprehensive

plan. The City will update this information as part of its 2016 comprehensive plan update process.

VIII. Conclusions

Based on the results of the County's land capacity analysis, the current Nooksack UGA does not contain sufficient capacity to accommodate the preliminary allocations of population and employment growth included in the 2014 multi-jurisdictional resolution. Therefore, the City's 2015 UGA Proposal includes a number of proposed changes intended to ensure that the Nooksack UGA will have sufficient capacity to accommodate proposed growth through 2036. These proposed changes include the following, some of which were modified to address input received from the County Planning Commission:

- Increasing residential densities;
- Reducing the proposed population and employment growth allocations;
- Shifting two split-jurisdiction parcels totaling 9 acres from the Everson UGA to the Nooksack UGA for future residential development;
- Increasing the area to be shifted from the Everson UGA to the Nooksack UGA to include a full 20-acre area to avoid creating an irregular outer boundary;
- Adding a 6-acre parcel to the UGA that is owned by the Nooksack Valley School District that is planned for future outdoor recreation; and
- Adding a 4229-acre future industrial area to the UGA in exchange for removing an 81-acre area from the UGA Reserve that is potentially impacted by Swift Creek sediment containing naturally occurring asbestos.

With the changes included in the Nooksack UGA Proposal, the Nooksack UGA would have sufficient capacity to accommodate the reduced population and employment growth allocations proposed by the City.