



STATE OF WASHINGTON  
DEPARTMENT OF COMMERCE  
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October 24, 2025

City Council  
City of Sumas  
433 Cherry Street  
Sumas, WA 98295

c/o Carson Cortez  
City Planner

Sent Via Electronic Mail: [CCortez@cityofsumas.com](mailto:CCortez@cityofsumas.com)

Re: Review of Proposed Amendments to City of Sumas Municipal Code

Dear Council Members,

Thank you for the opportunity to comment on proposed amendments to the City of Sumas's development regulations. Growth Management Services received the proposed amendments on August 26, 2025, and processed them with material identification number 2025-S-9794.

We have reviewed your draft amendments using Commerce's [Accessory Dwelling Unit Checklist updated January 2025](#).

We appreciate the City's efforts to amend its ADU regulations and, based on our review of the proposed amendments, offer our comments and recommendations below:

1. Section 20.55.030(6) requires entry door standards for appearance and location. As proposed, we do not believe this is consistent with [RCW 36.70A.681\(1\)\(h\)](#) stating that a city may not impose restrictions on entry door locations. We recommend removing section 20.55.030(6) to align with RCW 36.70A.681(1)(h).
2. Section 20.55.030(9) states that the design of an ADU to include elements similar in type, size, and placement material to that of the PDU. Consistent design standards may increase cost associated with ADU development. We recommend removing language requiring similarities to the principal dwelling unit (PDU) within section 20.55.030(9) to better align with [RCW 36.70A.681\(1\)\(h\)](#) which states that a city may not impose requirements for ADUs that are more restrictive than those for the principal units. For more information see [ADU guidance document pages 16-17](#).
3. The proposed submittal does not specify that detached ADUs may be sited at a lot line if the lot line abuts a public alley. As proposed, we do not believe this is consistent with [RCW](#)

[36.70A.681\(1\)\(i\)](#). However, there is an exception to this if the city routinely plows snow on the public alley. We recommend adding language within the section 14.18.106 to align with RCW 36.70A.681(1)(i), if the city does not routinely plow public alleys. For more information see [ADU guidance, page 15](#).

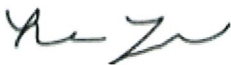
4. Proposed section 20.55.080(1) requires two off-street parking spaces per ADU. As proposed, we do not believe this is consistent with [RCW 36.70A.681\(2\)\(a\)\(ii-iii\)](#) that requires parking based on lot size. We recommend modifying section 20.55.080(1) to align with RCW 36.70A.681(2)(a)(ii-iii). For more information see [ADU guidance, pages 13-14](#).
5. Please note that the converted structures to ADUs do not have to meet setback and lot coverage requirements per [RCW 36.70A.681\(1\)\(j\)](#). We recommend clarifying this in your code.
6. Section 20.55.110 includes subjective open space and landscaping requirements for lots with an ADU. We suggest keeping these requirements for open space and landscaping the same for ADUs as the PDU for consistency with RCW 36.70A.681(1)(h).

Please note that if a jurisdiction that has not adopted or amended regulations consistent with [RCW 36.70A.681](#) six months after the periodic update due date, (June 30, 2026 for Sumas), the requirements of RCW [36.70A.681](#) will supersede, preempt, and invalidate any conflicting local development regulations. Please refer to the [preemptive state laws for infill housing fact sheet](#) for detailed information.

As a friendly reminder, copies of adopted amendments shall be submitted to Commerce within ten days after final adoption ([RCW 36.70A.106\(2\)](#)).

Again, we appreciate the opportunity to work with the City of Sumas and provide comment on the proposed amendments. We are available for technical assistance and, if requested, can attend upcoming meetings with your Planning Commission and/or Council. If you wish to discuss any of the comments presented in this letter, you may reach me at [Lexine.long@commerce.wa.gov](mailto:Lexine.long@commerce.wa.gov) or 360-480-4498.

Sincerely,



Lexine Long, AICP  
Senior Planner  
Growth Management Services

cc: David Andersen, AICP, Managing Director, Growth Management Services  
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