City of Sumas
Comprehensive Land Use Plan
2025-2045

Prepared with the Assistance of:

Rollin Harper
Sehome Planning and Development Services
and
Whatcom Council of Governments

December 2025 Update

ACKNOWLEDGEMENT

Special thanks to the following organizations and individuals for their invaluable contributions to completing the 2025 update of the City of Sumas Comprehensive Land Use Plan:

Mayor Bruce Bosch
Members of the Sumas City Council
Members of the Sumas Planning Commission
Sumas City staff

Rollin Harper, Sehome Planning and Development Services
Jaymes McClain, Whatcom Council of Governments

Partial funding for this update was provided through a grant from the Washington State Department of Commerce.

Table of Contents

Maps and Figures:

Appendices:

1 Introduction

1.1 Authority

This document is the comprehensive land use plan for the city of Sumas. A comprehensive plan is a legally recognized document that provides a framework for making land-use and other planning decisions. Development of this plan is authorized by RCW 35A.63 ("Planning and Zoning in Code Cities").

Development of this plan is also required by RCW 36.70A, commonly known as the Growth Management Act (GMA). Enacted by the 1990 Washington state legislature, the GMA requires cities in fast-growing counties to coordinate with neighboring jurisdictions in order to plan for future growth while conserving important natural resources and protecting critical areas. Whatcom county qualified as a fast-growing county according to the criteria in the GMA, so Sumas (as well as all other cities in Whatcom county) is required to complete the comprehensive planning process.

1.2 Scope and Purpose

This plan contains seven mandatory elements as specified in the GMA (RCW 36.70A.070):

- Land-use element. This element designates the proposed general distribution, location, and extent of lands for housing, commerce, industry, recreation and open space, and public facilities and utilities.
- Capital facilities element. This element contains an inventory of existing capital facilities owned by public entities. The element also shows the proposed locations and capacities of forecasted improvements and presents a six-year plan demonstrating how those improvements can be financed.
- Housing element. This element contains an inventory and analysis of existing and projected housing needs.
- Transportation element. This element contains an inventory of transportation facilities and services along with an analysis of future transportation needs. The element also presents a six-year financial plan for transportation improvements.
- Utilities element. This element describes the general location and capacity of existing and proposed utilities, including natural gas, electric, and telephone utilities.
- Economic development element. This element describes the local economy and establishes goals, policies and programs to foster future economic growth.
- Parks and recreation element. This element contains an inventory and analysis of existing and proposed parks and recreational facilities. This element is included in chapter 4, Capital Facilities.

Generally, each element first documents existing conditions and then discusses future scenarios that seem both desirable (in light of community preferences) and attainable (in light of community resources and constraints). Aside from these major elements, the plan also includes background information, community survey results, a vision statement, a number of goals and objectives, and other supporting information.

A plan written in compliance with the GMA must address in general terms the twenty year period following plan adoption, but must also include a detailed financial analysis pertaining to the first six years of that period.

Although adopted by ordinance, the plan is fundamentally a policy document. Implementation of the plan will usually depend upon other regulatory tools such as the zoning and subdivision ordinances. The GMA requires the city's development regulations to be consistent with the plan.

The plan is written for several audiences, including: local decision-makers (i.e., planning commissioners, councilmembers, mayor), residents, developers, and state and county officials. The plan seeks to notify people of the city's future direction and to establish a clear intent that can be used to develop and interpret municipal regulations. The plan should also help the city secure outside funding for development projects; eligibility for most state infrastructure funding programs is dependent upon completion of the plan.

In addition, the goals and policies established through the City of Sumas Shoreline Management Master Program, as currently adopted or hereafter updated, are included as goals and policies incorporated into this plan and constitute the Shoreline Management element of the comprehensive plan as required by the Growth Management Act. See Chapter 9.

1.3 Public Participation Process

The GMA requires that Sumas establish procedures providing for early and continuous public participation in the planning process (RCW 36.70A.140). The following procedures constitute the public-participation process in the city of Sumas. The procedures shall be followed whenever the city proposes to amend or adopt any part of the comprehensive plan or the development regulations implementing the plan.

- Communication programs and information services. At least sixty days prior to formal action on a proposal, the city shall inform the public about the proposal in the following ways: (1) a press release summarizing the proposal will be sent to the city's paper of legal record; (2) a summary of the proposal shall be read at a regular meeting of the city council. In addition, an article concerning the proposal will be included in a timely issue of the city newsletter, if the newsletter is currently in publication.

  When a proposal might affect another jurisdiction, a summary of the proposal shall be mailed to the chief executive of that jurisdiction at least sixty days prior to formal action on the proposal.

- Dissemination of proposals. At least sixty days prior to formal action on a proposal, copies of the full text of the proposal shall be made available to the public at city hall and at the Sumas branch of the Whatcom County Library System. Availability of these copies shall be mentioned in the summaries and articles described in the prior paragraphs.

  As required by RCW 36.70A.106, the city shall mail copies of the full text of the proposal to appropriate state agencies at least sixty days prior to formal action on the proposal.

- Written comments. The city shall accept written comments concerning a proposal during a sixty-day period ending on a specified date, and formal action on the proposal shall not occur before the close of the comment period. The process for submission of written comment (i.e., the address for submission and the ending date) shall be described in the summaries, articles, and mailings described in the prior paragraphs.

  Written comments shall be considered by the city at open public meetings. Each comment shall be distributed to every member of the governing body convening the meeting. Discussion and disposition of the comments shall then take place. Although discussion at a public meeting shall be the only required response to a written comment, the city may additionally acknowledge or respond to a comment by another means.

- Public meetings. Governing bodies shall consider and take action upon proposals only at meetings convened in compliance with the Open Public Meetings Act of 1971.

  During the sixty-day period for acceptance of written comments, the governing body shall hold at least one meeting at which the public is encouraged to provide verbal comments upon the proposal. If many people intend to comment, the governing body may limit the length of each person's comments. The time and place of this meeting, along with an invitation to make comments, shall be included in the summaries, articles, and mailings described in prior paragraphs. Subsequent discussion (if any) in reaction to a verbal comment shall be the only required response to that comment.

The foregoing is a minimum set of procedures that shall be followed for every eligible proposal. As described in the following section, the city will occasionally undertake major reexaminations of the comprehensive plan. During such events, a more extensive process for solicitation of the public's viewpoints will be used. The process might make use of: a special-purpose citizen's advisory committee; a survey; well-advertised workshops at which alternative proposals are developed or discussed; other outreach tools. Chapter 2 contains a record of the participation process used during the original creation of this plan from 1990 through 1995.

1.4 Plan Amendment Process

The GMA requires that Sumas establish procedures regulating the frequency of amendments to the comprehensive plan (RCW 36.70A.130). The following procedures constitute the plan-amendment process in the city of Sumas.

- Minor amendments. The comprehensive plan shall be amended no more than once within a

calendar year, except that additional amendments shall be allowed whenever an emergency exists. At the beginning of the amendment process, the city council shall review all pending amendment proposals and make a determination as to which proposals shall be docketed for inclusion in the amendment process. All formally docketed amendment proposals shall be considered concurrently so that the cumulative effect of the various proposals can be ascertained.

- Major amendments. The city shall occasionally undertake a major review and update of the comprehensive plan, including a reexamination of each element and a reconsideration of the adequacy of the land supply within the UGA. This process will involve coordination with Whatcom County and may lead to adoption of a revised UGA. Such a process shall take place consistent with the timing requirements established in the GMA and no later than ten years after the previous major amendment process.

1.5 Process to Avoid Unconstitutional Taking of Private Property

All proposed actions potentially impacting the use of land within the city are reviewed to ensure that such actions do not result in an unconstitutional taking of private property. Proposed actions, such as changes to comprehensive plan goals and policies, changes to current and future zoning designations, and changes to development regulations (including changes to allowed uses in specific zoning districts), are subject to review at a number of levels. City staff have training and experience in how to review proposed actions to identify those that might result in an unconstitutional taking of private property. This training includes becoming familiar with the state Attorney General's guidance on how to avoid unconstitutional takings. In addition, all major land use decisions are reviewed by the City Attorney to ensure consistency with state and federal law. Finally, all proposed actions made by the City Council potentially impacting land use and development within the city are subject to review and comment by the public, and opportunities to provide public testimony regarding the potential taking of private property are made available by the City Council during the required public hearing process.

2 Background

2.1 History

The name Sumas is derived from a Native-American phrase "sm-mess" which means "land without trees." The original word comes from the Cowichan Tribe and refers to a natural prairie at the approximate site of the modern city of Sumas.

Settlers of European extraction arrived in the Sumas River basin in the 1870s. Records show a homestead by R. A. Johnson in 1872. Early settlers were drawn by the timber resources in the area, and a mill was soon constructed. During the 1880s gold rush, Sumas became a major outfitting center for prospectors seeking gold in the Fraser River basin. The city boomed to over 2,500 people. A weekly newspaper, *The Sumas Advocate-News*, was first published in 1889. Growth was further encouraged by the arrival in 1889 of the Northern Pacific Railroad and the Chicago, Milwaukee, and St. Paul Railroad, providing a rail link with the Canadian Pacific Railroad. The link with Canadian transportation facilities, including US Customs and Immigration Services, remains an important economic resource today.

The city of Sumas was incorporated in 1891, and the first school was built in 1892. While the early growth of the city was supported by the timber and mining industries, a gradual shift toward an agricultural base took place during the first decades of the 20th century. Dairy farming, poultry farming, and fruit raising became major contributors to the city's economy. A 1921 publication titled "The Show Window: Publication of the Chamber of Commerce, Bellingham, Whatcom County, Washington" identifies Sumas as "a desirable residence town" with "splendid schools, both grade and high, paved business streets, electric lights, good water supply, public library, telephone service, and other city conveniences."

Between 1900 and 1940, Sumas dwindled in size as a result of the combined effects of the Great Depression and the shift away from timber and mining. By 1940 there were less than 700 residents in town. The size and economic base of Sumas then changed very little through 1990: the city continued to rely on border-related commerce and the surrounding agricultural base. Recent trends are discussed in a later section.

In recent years, Sumas has experienced a major series of floods (one in early 2020 and two in late 2021) which have drastically changed the culture in Sumas. The first flood in late 2021 was by far the largest flood in living memory county-wide. One casualty was reported in the City of Everson. 85% of all structures in the city of Sumas were damaged by the flood waters as they rushed through town on their way to the Fraser River. Many residents were left without viable shelter. The process of repairing and rebuilding damaged homes and businesses is ongoing, four years after the event.

2.2 Prior Planning

Sumas developed a draft comprehensive plan in 1969, with the assistance of Urban Planning and Research Associates, a Seattle-based consulting firm. The plan included an inventory of existing land uses, a set of development and land use goals, a map recommending land-use zones, and a discussion of traffic circulation. Although an official zoning map was adopted after publication of the draft plan, the plan itself was never completed or adopted by the city council. As mentioned earlier, the GMA now requires that the city develop a more extensive plan.

2.3 Summary of Planning Pursuant to the GMA

Sumas began the process of complying with the GMA late in 1990. The first steps taken were to identify and protect critical areas including wetlands, frequently flooded areas, fish and wildlife habitat, geologically hazardous areas, and critical aquifer recharge areas. By March of 1992 an interim critical areas ordinance was in place.

Development of the comprehensive plan got underway in the summer of 1992. A consultant was charged with development of the plan, under the supervision of the planning commission. A citizen survey was distributed in July of 1992 and the results of the survey were distributed to city officials soon thereafter. In March of 1993 a town meeting was held to present the results of the survey and initiate a goal-setting process. In April of 1993 the county and the cities adopted county-wide planning policies. A draft set of local goals was developed in the summer of 1993 and presented at a second town meeting in September. The focus then shifted to establishment of an interim UGA, as required by a 1993 amendment to the GMA. After public hearings before the county planning commission and county council, an interim UGA encompassing 772 acres was adopted by the county council in May of 1994. Work on the comprehensive plan resumed in the spring of 1994 and continued until adoption of the first GMA-compliant plan in mid 1995.

In mid-1997 a plan update was begun as an outgrowth of a flood-planning process. Flood planning had revealed the need for different land uses in certain flood-prone areas, and also revealed that other areas were suitable for development. Other minor plan amendment requests had also been docketed. The planning commission began reviewing proposed amendments in the fall of 1997. In early 1998, the city council decided to simultaneously tackle an update of the Shoreline Master Program, which had not been revised since 1988 and which contained some problematic provisions. Wildlife and fish habitat consultants worked in the spring of 1998 to develop science-based data, and a coordinated proposed update of the SMP and the comprehensive plan was published in June, 1998.

The 2001 plan update was undertaken in order to develop and integrate a detailed parks and recreation element and to incorporate the results of a *Water System Comprehensive Plan* that was finalized in the fall of 2000. The planning commission began reviewing proposed amendments in the fall of 2000, and a draft plan revision was produced in spring 2001.

In 2002 the state legislature mandated that Sumas, together with other jurisdictions in Whatcom County, revise its comprehensive land-use plan prior to December 1, 2004. The review was to also include a review of all development regulations (i.e., zoning, subdivision, critical areas) to

ensure consistency with the current goals and requirements of the Growth Management Act. The planning commission began the revision process in the fall of 2003 and produced a revised draft in the spring of 2004.

Amendments to the GMA adopted after 2004 established that the city of Sumas, in coordination with Whatcom county and the other cities in the county, was required to review and update its comprehensive plan and development regulations and review its UGA by the end of June, 2016. Coordination with neighboring jurisdictions regarding the required review and update began in 2013. Initial work involved coordinating with staff from Whatcom county and the other cities in the county to develop an overall update schedule, a land capacity analysis methodology, and background information. In the fall of 2013, a consultant hired by the county (but paid for by all of the cities as well) prepared high, medium and low projections for population and employment growth in the county through 2036 along with allocations of such growth to all of the UGAs, including Sumas. In late 2013, the city submitted a preliminary proposal to the county that identified the city's proposed allocations of population and employment growth. In early 2014, the Whatcom county council adopted a non-binding resolution establishing preliminary allocations of population and employment to all of the cities, including to the city of Sumas. In June of 2015, the Sumas city council authorized submission of the city of Sumas UGA Proposal, which included the same allocations of population and employment included in the prior county council resolution. The Sumas planning commission began the review and revision process in the fall of 2015, and the recommended revisions to the plan were made available in the spring of 2016. Final action adopting the 2016 update of the comprehensive plan was taken by the Sumas city council in June 2016.

In 2020, an adopted amendment to the Growth Management Act established that the city of Sumas, in coordination with Whatcom County and the other cities in the county, was required to review and update its comprehensive plan and development regulations and review its UGA by the end of December, 2025. In 2024, the Washington State Legislature further amended the Growth Management Act to require that jurisdictions within Whatcom County complete their updates to their comprehensive plans, development regulations, and UGAs by the end of December, 2025. The 2020 amendment also established that the timing for major comprehensive plan updates has been extended from an 8-year timeline to a 10-year timeline. In 2021, Whatcom County, in coordination with the cities therein, began the process of updating comprehensive plans. The County and cities issue a Buildable Lands Report in 2022. In 2023, the County hired a consultant, partially paid for by the cities, who set out on developing a population and employment projections report.

2.4 Community Survey

In May of 2024, the City conducted a community survey of all residents in and around Sumas. Surveys were available online and were also mailed out to every resident with their utility bill. The City received 120 responses, a response rate of about 6 percent. A copy of the actual survey document is included in Appendix III, along with the complete set of comments made by residents. The following is a brief summary of the survey showing the five major questions followed by the responses in priority order. The most popular responses to the question are shown on top.

Q. Do you think Sumas is heading in a good direction? (1 to 5 Scale, 5 being good, 1 being bad. Responses are listed below with most popular answer on top)

- 4
- 3
- 5
- 2
- 1

Q. What do you consider to be Sumas' greatest strengths as a community?

- Small Town Feel
- Great Tasting Water
- Semi-Country Living
- Peace and Quiet
- Good Neighbors
- Great Place to Raise Children
- Close-knit Community
- Proximity to Canada
- Housing Affordability
- Great Parks and Recreation

Q. Which amenities would you like to see come to Sumas?

- Doctor's/Dentist's Office
- Bank
- Hardware Store
- Public Pool
- Recreation Center
- Athletic Business
- Theater/Cinema
- Hotels/Motels
- Childcare Center
- Skatepark

Q. What aspects of Sumas do you think could use improving? (Organized by response category)

- More Businesses
- Infrastructure
- Flood Control
- Curb Appeal
- Recreation
- Housing
- Nuisances
- Growth

- Events
- Border

Q. What do you think should be the City of Sumas' top priority for the next 20 years? Why? (Organized by response category)

- Flood Control
- More Businesses
- Infrastructure
- Housing
- Growth
- Curb Appeal
- Recreation
- Nuisance
- Safety
- Border
- Disasters

The final two questions listed were formatted to be filled out as written answer questions. The full list of written answers for those questions will be included in Appendix IV. In summary, the written responses showed solidarity on issues such as business growth and curb appeal. Many respondents commented on Cherry Street, Sumas' downtown corridor, and its presentability, emphasizing that the City should prioritize rehabilitating the downtown to look more inviting and maybe attract new businesses. Flood control was also a major priority for the respondents. They emphasized that flood control needs to be the number one priority for the City for the next twenty years.

2.5 Community Vision and Goals

Based upon the results of the community survey, the input of the planning commission, and citizen feedback at public meetings, the following vision has been identified:

Sumas should continue to grow and develop while maintaining its small-town character, promoting a high quality of life for its citizens, and preserving the unique identity and diverse characteristics of the city. Sumas should strive to respect the legacy of the past while promoting economic vitality and quality of life for future generations.

Several policy objectives have been identified to help the city attain this vision.

- Sumas should protect the natural elements -- the clean air, pure water, and beautiful open space -- that create the pastoral environment enjoyed by residents.

- Sumas should protect the residential character that is the essence of a rural town: residents should have "room to breathe", yet should still be able to walk anywhere in town.

- Sumas should encourage commercial development that provides a benefit to local residents.

Sumas should capitalize upon the large number of “passers-through” in order to support desirable businesses that would otherwise not survive in such a small town.

- Commercial development should be contained within compact, well-defined areas, both to minimize the impact on surrounding neighborhoods and to serve patrons conveniently.

- Sumas should encourage "clean" industrial development in areas separate from residential use.

- Sumas should enhance the facilities at existing parks and also develop new trail and park facilities by conversion of land that is unsuitable for development because of flooding.

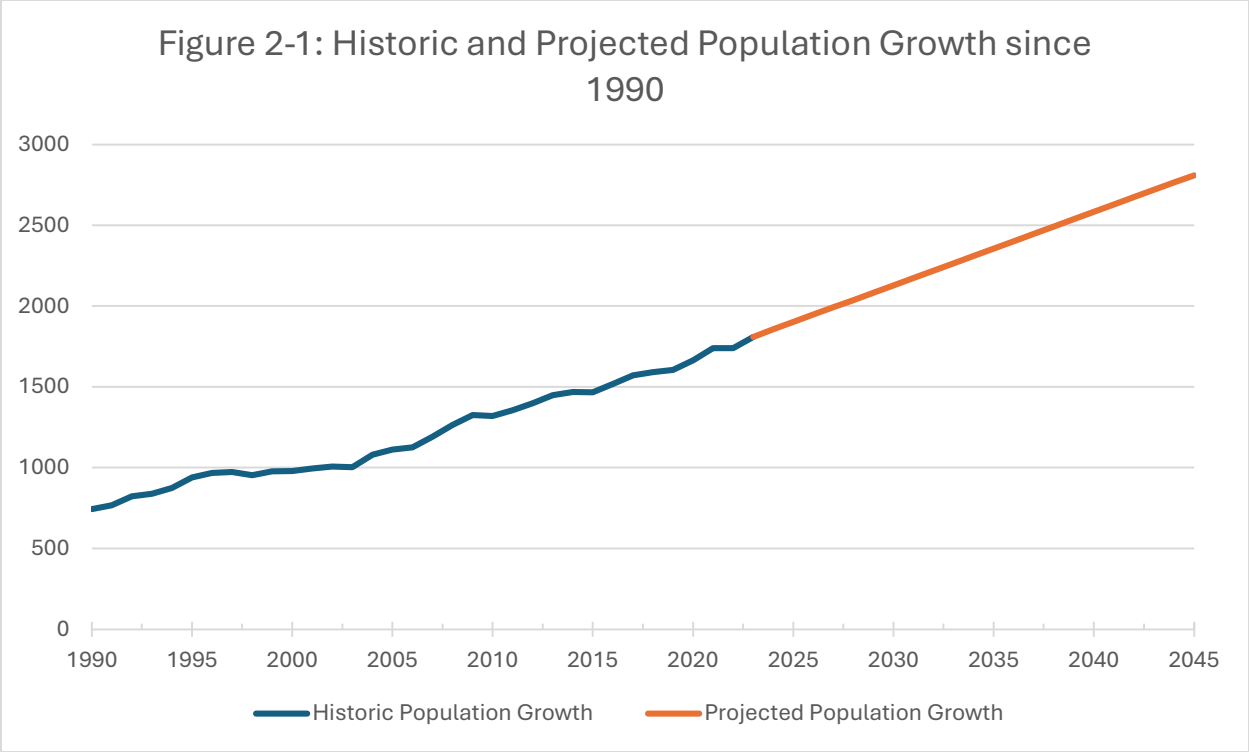
- Sumas should protect groundwater resources to ensure that potable water meeting the current high standard and in quantities sufficient to support new growth will continue to be available into the future.

- Sumas should provide special protection of anadromous fisheries through implementation of the city’s critical areas regulations and shoreline management master program goals, policies and regulations.

In addition to the goals set forth above, the planning goals established in the Growth Management Act (GMA) pursuant to RCW 36.70A.020 are hereby adopted and incorporated by this reference as planning goals under this comprehensive plan. In addition, the policy of the Shoreline Management Act established under RCW 90.58.020 is added as one of the GMA planning goal, without creating any priority order, and is incorporated by this reference into the Sumas comprehensive plan.

2.6 Population Projection

After decades of relatively constant population, Sumas experienced substantial growth beginning in 1990. From 1940 to 1990, the average annual growth rate was a mere 0.25 percent, and during certain decades (e.g. 1950s, 1970s) the population fell by small amounts. In contrast, the average annual growth rate was 2.7 percent during the interval from 1990 through 2004, which equated to an average increase of 24 people per year. This rapid rate of growth continued, even increasing somewhat. During the 20-year period from 2003 to 2023, the average annual growth rate in Sumas increased to 3.0 percent. Growth during this recent period saw Sumas add approximately 40.4 people per year. Figure 2-1 shows how the population in Sumas has grown since 1990.



In 2024, Whatcom County's consultant, SCJ Alliance (SCJ), provided a range of projections for population growth in Sumas from the baseline year in 2023 through 2045 at the end of the planning period. SCJ's "High" estimate of an increase of 1,052 people would be achieved if growth were to occur at an annual average rate of 1.67 percent in the period from 2023 through 2045, which equates to an average annual increase of approximately 48 people per year. SCJ's "Medium" and "Low" growth projections reflected growth rates of 1.26 percent and 0.93 percent, respectively. These growth rates equate to average annual increases of 32 and 21 people per year over the twenty-two-year period.

Survey results and citizen testimony reveal that residents desire some growth in coming years. The planning commission believes that a population of about 2,800 would be compatible with the small-town atmosphere that residents wish to preserve.

In consideration of the consultant projections, historic growth rates and the residents' desires, *Sumas plans to accommodate a population of 2,810 in the year 2045, which equals a net increase of 1,000 from the 2023 population of 1,810.* The city's adopted population growth projected through 2045 is also shown on Figure 2-2. The target population will be attained if growth occurs at an average annual rate of 2.0 percent. The population growth rate adopted by Sumas is consistent with the strong growth in the city seen over the past thirty-five years and is based, in part, on the expectation that, over the next twenty years, increasing shares of overall county growth will be seen in urban areas due to limitations on growth in rural and resource lands as a result of the GMA. Table 2-1 shows projected city population at milestone planning years, based upon the adopted population growth number and using 2023 as the baseline year.

Table 2-1. Adopted Population Projection, 2023-2045

Milestone year	Projected population	Number of newcomers
2020 Census	1,665	-
2023 OFM Baseline	1,810	-
2031 Six-year capital planning horizon	2,174	364
2035 Mid-point in planning period	2,356	546
2045 Planning period	2,810	1,000

2.7 Employment Projection

The SCJ Report projects that the Sumas employment base will increase by 148 jobs over the course of the planning period. However, consistent with Whatcom County's initiative to provide more opportunities for industrial development, Sumas will be looking to prioritize bringing in new industries during the upcoming planning period. Because of this effort, the City of Sumas has allocated an employment growth of 500 jobs through the year 2045.

3 Land Use Element

This chapter is a required element of a comprehensive plan developed to meet the provisions of the GMA. The chapter describes how the plan's overall goals will be implemented through land-use mechanisms. In overview, this chapter presents descriptions of the local environs, an inventory of existing land use, an estimate of future demands for land, and a description of the development that must occur, both inside and outside the existing city, in order to meet future demands.

3.1 Geography and Environment

The city of Sumas is located adjacent to the Canadian border in western Whatcom county, approximately 25 miles northeast of Bellingham. The nearest neighboring city is Nooksack, which lies seven miles to the southwest. See Map 1A. As shown in Map 1B, Sumas is a small city encompassing just 935 acres of land. A major border crossing is located in town, so several transportation facilities terminate at Sumas, including SR9 and a Burlington Northern railroad line. The surrounding terrain consists primarily of gently sloping land in the Sumas River basin. At the north of town is a knoll known as Moe's Hill, site of the city's water reservoir. Map 1A also shows that higher ground is located 1.5 miles west of town. These uplands stretch extensively to the west and northwest and consist of sand and gravel deposited by outwash during episodes of glaciation.

Geology. Map 2A reveals the local geologic environment. Two faults trend southwest-to-northeast from the San Juan Islands through Whatcom County and into southern B.C. Between the faults the bedrock has dropped relative to the surrounding land, and the down-dropped area has filled with unconsolidated sands, silts, and clays, forming the areas known as the Nooksack Valley, the Sumas Prairie, and the Upper Fraser Valley. The faults might still be active. Sumas is situated on the unconsolidated sediments near the north edge of the down-dropped area.

Soils. Map 2B shows the locations of various soil types according to the Natural Resource Conservation Service (NRCS). Soil types under the developed part of the city are numbers 22 (Briscot), 162 (Sumas), and 123 (Puget). These soils consist of nutrient-rich sediments deposited by the flooding that occurs regularly along the rivers and streams. When protected from flooding, these soils are good pasture or crop land. The soils have the strength to support buildings, but drainage around foundations and footings can be a problem. Outside town on the floodplain are two other soils with similar characteristics, numbers 107 (Mt. Vernon) and 115 (Oridia).

At the northwest of town, extending to the west along the border, are soils associated with the glacial deposits underlying Moe's Hill and the uplands. These soils are numbers 96, 97, and 98 (Laxton). These soils are adequate pasture or crop land and also have the strength to support buildings, although a seasonally high water table affects the use of these soils. Soil number 157 (Squalicum) exists on the slopes of Moe's Hill. This gravelly soil is good woodland, but the 15 to 30 percent slope hinders the soil's usefulness for other purposes.

At the west of town are areas of soil number 116 (Pangborn) and 144 (Shalcar/Fishtrap). These

are mucky soils that have limited usefulness for either farming or building. To support buildings, the muck must be excavated or the buildings must be constructed on pilings.

Groundwater. The sand and gravel upland to the west of town is a major regional aquifer known as the Abbotsford-Sumas aquifer. Sumas relies on the aquifer for its own domestic water supply, and Sumas also supplies groundwater to three neighboring water associations and the city of Nooksack. There are several seeps and springs scattered along the edge of the aquifer. Arrows in the northwest corner of Map 1B identify the two springs that are most important to Sumas. The city has a wellfield located at each identified site. The westernmost site is the May Road wellfield, and the northern site is the Sumas wellfield.

Agricultural activities on the upland have led to degradation of water quality. The groundwater contains elevated levels of nitrate (caused by fertilizers and manure) and trace levels of organic chemicals (caused by pesticides). At Sumas' wells, nitrate contamination is the only concern. The May Road well produces water with a nitrate concentration of about 9.5 milligrams per liter (mg/l), as compared to a maximum allowable concentration in drinking water of 10 mg/l. The water is thus used only for industrial processes at this time. The Sumas wellfield produces water with a nitrate concentration of below 5 mg/l.

Wetlands and surface waters. Map 3 shows wetlands in and around Sumas as found in the National Wetlands Inventory (NWI) and in inventories conducted for the city by David Evans & Associates (DEA) and Bexar Consulting. Within the existing city limits, most wetlands are present to the west of downtown, between Halverstick Road and Kneuman Road. These wetlands are associated with the existing creeks or with sloughs formed by old courses of the creeks. Some are classified "palustrine emergent" (PEMC, PEMA according to the NWI), which means they are associated with stream courses and are seasonally flooded. Some are "riverine perennial" (R2UBH), meaning that they are permanent wetlands associated with the creeks. The westernmost wetlands on Map 3 are "palustrine forested" (PFOC, PFOA) and are associated with marshy areas at the edge of the Abbotsford-Sumas aquifer.

The major local surface water is the Sumas River, which has its headwaters on Sumas Mountain, a foothill of the Cascade Mountains lying six miles to the southeast. The region slopes gently northward, so the Sumas River flows north to the Fraser River in Canada. Three other creeks converge in town: Sumas Creek flows from the west, and Johnson and Bone Creeks flow from the southwest. Sumas Creek merges with Johnson Creek at the west of the downtown area, and Johnson Creek flows east through the downtown area and empties into the Sumas River just east of the city limits. Sumas Creek originates at springs located at the edge of the Abbotsford-Sumas aquifer. Bone Creek empties into the Sumas River near the southeast corner of town. Another regional waterbody affecting Sumas is the Nooksack River, which flows west through the city of Everson (eight miles to the southwest) and empties into Puget Sound. During major flood events, the Nooksack River overflows its banks at a location southeast of Everson, and floodwaters flow north following the Johnson Creek corridor and then pass through downtown Sumas on the way to Canada. All the local rivers and creeks follow meandering courses and have shifted beds many times in the past.

According to the Department of Ecology, the Sumas River is a 'class A' waterbody, meaning that

water quality should meet high standards. Monitoring programs upstream from Sumas have revealed, however, that water quality fails to meet some class A standards: water temperature reaches 22° C in the summer, compared to a desired maximum of of 18° C; dissolved oxygen concentrations have dipped as low as 6.1 mg/L, compared to a minimum of 8.0 mg/L; concentrations of fecal coliform bacteria and of certain metals (silver, cadmium, lead, mercury) have exceeded allowable levels. With the possible exception of the metals pollution, Sumas is largely blameless for the water-quality problems. Elevated temperatures are a consequence of low flows during the summer months combined with loss of shade trees adjacent to the river, and runoff from farms is regarded as the major cause of low oxygen and high coliform concentrations. Substandard water quality detracts from many beneficial uses of the river, but particularly impacts fish habitat.

Fish and wildlife habitat. In 1998, DEA prepared a *Fish Habitat Reconnaissance Assessment* that analyzes the habitat potential in the local streams. The report indicates that fish habitat conditions in Sumas range from poor to fair. Quoting from the report:

> Physical in-channel features such as wood or large substrate are mostly absent from the streams, leaving habitat structure lacking in both diversity and complexity; resultant channel conditions are often long glides of uniform dimensions interspersed with a few ill-defined pools. The few pools that do exist are infrequent, occupy small areas, and are not much deeper than the glides, because they are often infilled with fine sediment. Spawning habitat was almost nonexistent in the study streams, with a few small patches of spawning gravels noted only in the upper reach of Sumas Creek. In many of the study reaches, opportunities for fish to find cover from prey were very limited; bank undercut does provide cover periodically. In areas where riparian canopy cover is lacking, reed canarygrass dominates the riparian vegetation.
>
> Only one area of Sumas' riverine systems can be described as providing exceptional habitat. This area is located in an extensive wetland system at the headwaters of Sumas Creek. Even this area has received some degree of impact and has some shortcomings... *(p. 5)*

The report provides detailed recommendations about kinds of habitat enhancement needed along the various reaches of the local streams. The recommendations are summarized on Map 3. Despite the degraded condition of the habitat, all the local creeks still function as habitat for anadromous fish. The Sumas River has steelheads and cutthroats that migrate to upstream tributaries such as Breckenridge Creek. Both Sumas Creek and Johnson Creek have coho, chum, and cutthroat.

There is also significant habitat for birds surrounding Sumas. The flood-prone lands south and southwest of town are good habitats for raptors, herons, waterfowl, and swans.

Flooding. Map 4 shows the location of flood-prone areas. The map shows a broad expanse of floodplain ("Special Flood Hazard Area" on Map 4) extending throughout much of the town. The floodplain is a result of flooding of the Nooksack River eight miles to the south. Given the prevailing northward slope, any overflow of the Nooksack heads north to Canada. Floods reach Sumas from the southwest along the path of Johnson Creek and are funneled toward town by the two railroad lines extending to the south and southwest. The elevated embankments function as

dikes that control the path of the flood. Flood water then heads northeast through the downtown region and across the border into Canada. Major floods occurred in 1989, 1990, 2020, and 2021, with water reaching a depth of five and a half feet downtown.

3.2 Critical Areas and Resource Lands

As required by the GMA (RCW 36.70A.170), the city of Sumas has adopted ordinances to designate, classify, and protect natural resource lands and critical areas. A summary of the regulations pertaining to the various kinds of areas is presented below.

Frequently flooded areas. These areas are regulated by Chapter 14.30 SMC (the Flood Damage Prevention Ordinance). The code recognizes three kinds of areas. Map 4 shows the approximate location of these areas, but the actual boundaries of regulated areas are as identified in the current adopted version of the Flood Management Plan. The flood *hazard* area encompasses all land that has a one percent or greater chance of flooding in a given year (i.e., the 100-year flood plain). Within that area, new buildings and major remodels must have the lowest floor at a height at least two feet higher than the flood elevation. The flood *risk* zone is a smaller area encompassing all land in and around a river channel, where water must move freely in order to carry the flood. Many kinds of development are prohibited in the risk zone. New buildings must stand on pilings so that flood water can pass freely beneath. Flood *corridors* are areas targeted for conversion from urban use to open space in order to provide increased flood-conveyance capacity through developed portions of the City. No new buildings are allowed on vacant lots within a corridor.

Wetlands and streams. These areas are regulated both by Chapter 15.20 SMC (the CAO) and by Chapter 15.04 SMC (the SMP). The SMP applies to Johnson Creek, Sumas River, and all hydraulically connected wetlands within the flood plain. The CAO applies to Bone Creek, Sumas Creek, and to wetlands outside the jurisdiction of the SMP. Equivalent provisions are enacted in both sets of code. The codes recognize four categories of wetlands:

- Category I. These are wetlands with exceptional resource value because they serve as habitat for endangered or threatened species or they harbor rare wetland communities with irreplaceable ecological functions. Natural Heritage Wetlands are included in this category. Generally, no development is allowed within 225 feet of category I wetlands, although exceptions may be made for certain public purposes.
- Category II. These are wetlands with significant habitat value because of either large size, diversity of vegetation, or presence of open water year-round. Wetlands adjacent to salmon-bearing streams are included in this category. Generally, no development is allowed within 165 feet of category II wetlands, although exceptions may be made for certain public purposes.
- Category III. These are wetlands with relatively little habitat value, diversity of vegetation, and functional value for stormwater management. Generally, buffers of 80 feet are required, but development is permitted provided a mitigation plan is followed.
- Category IV. These are low-value wetlands that are not included in the previous three categories. Generally, 50-foot buffers are required, but development is permitted provided a mitigation plan is followed.

Prior to approval of a development proposal, a delineation must be performed by a wetland specialist according to the method described in the *1987 Federal Manual for Identifying and Delineating Jurisdictional Wetlands* or currently approved federal manual and supplements. In some instances, the city may waive the delineation requirement.

The codes also establish buffers adjacent to streams. Buffer widths vary according to the shoreline environment designations. In urban environments, buffers range in size from 10 to over 100 feet. In the conservancy environment, an upland buffer of 100 feet applies. For both stream and wetland buffers, the codes allow averaging of buffer widths and also allow reductions in buffer widths if landowners develop enhanced buffers. Off-site mitigation is also permitted, provided that the mitigation receiving area is within a Natural System Protection Area, as described below.

Fish and wildlife habitat conservation areas. Habitat conservation is accomplished via the wetland and stream provisions of the SMP and the CAO, coupled with the Natural System Protection Area overlay zone. See the discussion of Natural System Protection Areas below.

Aquifer recharge areas. Sumas relies on groundwater as a domestic water source, but the wells are at the edge of town, and the *Wellhead Protection Program* reveals that recharge areas lie in Whatcom County and British Columbia. Sumas actively participates in binational groundwater protection forums such as the Abbotsford-Sumas Aquifer International Task Force and the Abbotsford-Sumas Aquifer Stakeholders Group. The CAO protects aquifer recharge areas within Sumas' jurisdiction from significant adverse impacts. The agricultural zoning surrounding the city well field serves to prohibit intense urban development that could pose a threat to water quality.

Geologically hazardous areas. There are two main categories of geologic hazard in Sumas. First, there are areas of steep slope on Moe's Hill that have been subject to small slides and that are inappropriate for development. See Map 2B. Second, western Washington as a whole is seismically active, both because of major tectonic plate movements and because of movement along shallow faults such as the two bedrock faults mentioned earlier (see Map 2A). The two local faults were thought to be inactive until late 2000, when evidence of their activity was presented by researchers at Western Washington University. If the faults are indeed active, the threat of earthquakes in northern Whatcom County and the Upper Fraser Valley might be greater than that elsewhere within northern Puget Sound. In Sumas, the major dangers associated with seismic activity are physical shaking of structures and liquefaction of underlying soils. Mucky soils are particularly susceptible to such shaking and liquefaction. Given the proximity of Sumas to the northern bedrock fault, there is also the possibility of vertical ground displacement on either side of the fault, but this threat is thought to be minor given the thickness of unconsolidated sediment overlying the actual fault.

The CAO contains provisions specific to geologic hazards. Because the entire region is thought to be seismically active, most of western Washington is mapped as seismic zone 3 within the International Building Code (IBC), and stricter standards are therefore already applicable. It is not known whether more stringent standards should be enacted locally, given the proximity of

the two bedrock faults. In the normal course of events, the IBC will eventually be updated to reflect any greater danger proven to exist along the faults. Meanwhile, if larger jurisdictions such as Bellingham, Whatcom County, and the City of Abbotsford, B.C., adopt stricter standards because of the new evidence, Sumas should consider following suit.

Mineral, agricultural, and forest resource lands. No mineral, agricultural, or forest resource lands of long-term commercial significance have been designated by Sumas within the city limits, the urban growth area or the urban growth area reserve designated by the county in 2009. However, Whatcom County's comprehensive plan does designate the surrounding unincorporated agricultural land as agricultural resource, except for portions within the Sumas UGA and UGA Reserve. This makes it difficult for Sumas to expand without impacting County resource lands. The city intends to grow such that agricultural uses will be able to coexist within the UGA until the event of an annexation. At that time agricultural lands will become available for development.

3.3 Natural System Protection Areas

The 1998, revisions to this plan and to the SMP were designed to protect and enhance the habitat value of the streams and the high-value wetlands. The regulatory framework for habitat protection is the designation of Natural System Protection Areas (NSPAs) within this comprehensive plan, together with the establishment of policies applicable to such areas. Implementation of the policies is then accomplished in the CAO and the SMP. Policies with respect to NSPAs are as follows:

- Existing habitats within an NSPA should not be adversely impacted by adjacent development.
- The habitat quality within NSPAs should be enhanced where possible.
- Above-ground structures should be prohibited within NSPAs, including parking and impervious surfaces. Underground structures should be allowed when such structures do not significantly impact habitat quality.
- Enhancement of habitat should be accomplished through regulatory incentives, including reductions in mandatory buffers when buffer quality is enhanced.
- Enhancement of habitat should be accomplished through voluntary programs, such as public or private mitigation banking.
- Mitigation banking should be authorized by code, with NSPAs serving as target areas for off-site mitigation.

In order to provide the science-based data needed to identify the existing value of habitat and the potential for habitat enhancement, Sumas commissioned two studies. DEA assessed the fish habitat value of local streams, and Bexar Consulting updated the city's wetland inventory. The wetland and stream data were then used, in conjunction with other criteria, to designate NSPAs. Designation criteria include:

- Areas now serving a valuable habitat function for fish and/or waterfowl.
- Areas capable of serving a valuable habitat function after enhancement.
- Areas serving additional functions as flood conveyance paths or as wellhead protection

areas.

- Areas with large parcel sizes, so that significant parts of a parcel would remain outside of a designated area and thus available for development.
- Areas not now containing urban development (i.e., impervious surfaces, buildings).
- Areas targeted for habitat enhancement by landowners.

Designated NSPAs are shown on Map 5. The following site-specific discussion is linked to the numbered areas on that map:

1. This 7.8-acre area includes the City's well-field parcel, as well as some land immediately adjacent to both the east and west. Sumas Creek flows through the southern edge of the area, and the area contains several springs feeding the creek, as well as forested wetlands hydraulically continuous with the creek. This part of the creek contains good spawning habitat, according to DEA's fish habitat assessment. The area also serves as the sanitary control area for the City's potable well field.
2. This 27-acre area contains all of Tract C of the Sytsma Lot-Line Adjustment, except for an 80-foot-wide swathe across the southern edge of Tract C, which is excluded from the NSPA in order to provide the owners with greater flexibility of use. The area is designated as an NSPA because the intended use of Tract C is wetland mitigation banking. The area is attractive for this purpose because it abuts Sumas Creek and because it contains topography and soil types conducive to conversion to wetlands.
3. This 7.3-acre area includes portions of undeveloped parcels owned by Burlington-Northern Railroad and by Sumas. Sumas Creek flows through the parcels, and the parcels contain significant canopy cover, as well as wetlands continuous with the creek. Within the B-N parcel, a 60-foot-wide swathe on the right bank is included within the NSPA, as well as all land on the left bank between the creek and Kneuman Road.
4. This 11.7-acre dumbbell-shaped area lies within an undeveloped 40-acre industrially zoned parcel that will likely be converted to industrial use early within the planning horizon. The northern part of the dumbbell corresponds to a forested Category II wetland, and the southern part contains a farmed wetland pasture that is mapped in the National Wetland Inventory. The farmed wetland has minor value as waterfowl habitat at this time and has potential for conversion to higher-quality wetland. The farmed wetland also serves an important flood- and stormwater-conveyance function. As mitigation for wetland impacts elsewhere on site, the eventual developer of the 40-acre parcel should enhance the farmed wetland either in its present location or in closer proximity to the forested wetland.
5. This 1.9-acre area lies within an undeveloped 20-acre industrially zoned parcel. The NSPA contains land within a 120-foot-wide swathe centered upon Sumas Creek, along the reach of the creek from the culvert under W. Third Street to the culvert under the B-N main line. DEA's fish habitat assessment identifies several enhancements appropriate to this reach, including installation of in-stream structures and planting of riparian vegetation. The eventual developer of the 20-acre parcel should enhance the creek riparian zone as mitigation for wetland impacts elsewhere on site.
6. This 9.9-acre area extends along the reach of Johnson Creek from the rail trestle behind Elenbaas to the rail trestle under the B-N main line. The area includes a 60-foot swathe along the left bank of the creek; and all of the right bank of the creek north of Front Street and west of the rail line; and the forested portion of the right bank south of Front Street; but exclusive

of the Front Street right-of-way. This creek reach is identified as quality fish habitat within DEA's assessment. The reach should be preserved and enhanced. Possible enhancements include planting riparian vegetation, particularly on the right bank at the north end of the reach. The area is also the main route of Johnson Creek flooding, which limits its development potential.

7. This 7.1-acre area stretches across the southern edge of four large parcels containing or intended for industrial development. Existing development within the four parcels is distant from Johnson Creek. The NSPA contains a 60-foot-wide swathe on the left bank of Johnson Creek, as well as all portions of the four parcels on the right bank of Johnson Creek. DEA's habitat assessment identifies improvements to riparian vegetation that could be made along this reach. Developers or parcels should enhance the riparian zone as mitigation for wetland impacts elsewhere on site
8. This 3.6-acre area is a topographically low area on the left bank of Johnson Creek at the back of the Tyrell parcel, together with a swathe 60 feet wide on the opposite bank. DEA's report identifies this area as a good site for a constructed side-channel. The site should be enhanced as off-site mitigation for impacts to low value wetlands elsewhere in town.
9. This 1.4-acre area contains a wetland that is tributary to Bone Creek. DEA's report notes that the wetland could be enhanced to provide off-channel rearing habitat. Alternatively, the wetland could be enhanced to improve water quality and wildlife habitat functions. The site should be enhanced as mitigation for impacts to low value wetlands elsewhere in town.
10. This 1.8-acre area contains a forested wetland associated with an old oxbow of the Sumas River. The oxbow is no longer continuous with the river, but it does offer significant habitat value to waterfowl. The oxbow wetland should be preserved.

3.4 Green Spaces and Community Forests

Washington State House Bill 1181 requires that green spaces and urban and community forests be identified along with the other requirements of the Land Use Element. The City does not have any urban and/or community forests identified, but there are various locations around Sumas where forests and green spaces are protected. Some of those areas include the natural system protection areas listed above, stream buffers, and City-owned properties where additional green space is protected. One of these spaces includes the Sumas walking trail, identified in the parks and recreation section of the Capital Facilities Element. The City also has a zoning district for Open Space and Agriculture, which can be classified as green spaces. Although there is nothing specifically identified for this requirement, the City does actively protect these sorts of spaces to preserve the beautiful scenery and ecosystem where Sumas is located.

3.5 Environmental Justice

As shown in the Climate Change and Resiliency Element of this Comprehensive Plan, the City has adopted specific goals and policies that directly address issues of Environmental Justice in Sumas. These goals and policies include:

Goal 9.2: Ensure environmental justice by providing residents with an equitable opportunity to learn about climate impacts, influence policy decision, and take actions to enhance community resilience.

Policy 9.2.1: Create and implement culturally contextualized outreach and education initiatives and materials that will inform the community about near-term and longer-term climate change threats and build resilience.

Policy 9.2.2: Build and support partnerships with community-based organizations with the capacity and relationships to convene diverse coalitions of residents and to educate and empower them to implement climate resilience actions.

3.6 Wildfire Protection

Sumas' location in a valley with little tree cover makes risk from wildfires significantly lower than in other communities. The International Code Council's Wildland Urban Interface (WUI) lists Sumas as a low-risk community. However, to ensure that Sumas continues to be resilient to wildfires, the City works with Whatcom County and the Whatcom Conservation District to build resiliency through the County.

3.7 Areas of Historical Significance

Sumas does not have any structures listed on the State or National registers of historic places. However, the Knight Barn located at the intersection of Rock Road and Swartwood Road is on listed on the Washington State Heritage Barn Register. Although there are no structures listed on the State or National registers, there are certain structures that maintain unofficial historical status within the City.

The main structure of historical significance to the city is the Old Sumas Customs House currently located at 131 Harrison Avenue. This structure, originally built in 1931, served as the official border crossing facility until the current facility was constructed in 1990. Once construction on the current facility began, the fate of the Old Customs House was put into question. After a strong community effort, the City was able to save the historic structure by having it relocated to its current location. To date, the building is owned by a private property owner.

3.8 Current Land Use and Zoning

Table 3-1 contains a summary of land use within the city limits as of August 2025. The table is organized according to general land use categories utilized by the County Assessor's office. Table 3-2 presents the total acreage within the City's current zoning designations. Map 6A shows undeveloped or underdeveloped properties that have infill potential for residential development. Map 6B shows commercial and industrial properties that have infill potential.

Table 3-1: Current Land Use (City limits)

Land Use Category	Acreage	Percentage
Single-family residential	224	24%
Multifamily residential	10	1%
Mobile homes	5	1%
Commercial	17	2%

Industrial	202	22%
Public and quasi-public	69	7%
Agricultural	77	8%
Vacant	174	19%
Rights-of-way	157	17%
Total	935	100%

Map 7 shows the locations of the various zones within the city. Generally, the business zones stretch the length of Cherry Street, the industrial zone is further west, bracketing W. Front Street, and the residential zones are to the south and east, except for the medium-density residential zone to the northwest at Moe's Hill. Table 3-2 presents the number of acres within each zone inside city limits.

Table 3-2: Current Zoning (City limits)

Zoning Designation	Zoning Description	Acreage	Percentage
Residential - High Density	A residential zone with a minimum lot size of 6,000 ft^2. Multifamily units conditionally permitted.	178	19.0%
Residential - Medium Density	A residential zone with a minimum lot size of 7,200 ft^2. Duplexes conditionally permitted.	109	11.7%
Residential - Low Density	A single-family residential zone with minimum lot size of 10,890 ft^2.	49	5.2%
Open Space/Agriculture	A zone containing open space and agricultural uses, accessory activities permitted.	86	9.2%
Business - Traffic-Oriented	A commercial zone that serves the needs of travelers. Motels, restaurants, convenience stores are permitted. Retail, office, gas stations, and other businesses conditionally permitted.	17	1.8%
Business - General	A commercial zone that provides day-to-day goods and services to residents.	46	4.9%
Business - Low Impact	A commercial zone containing businesses that generate little traffic and that typically cater to the needs of residents. Residential use is also permitted.	4	0.4%
Industrial	A zone containing light manufacturing, warehousing, wholesale, and selected retail businesses. Heavy manufacturing permitted as a conditional use.	387	41.4%
Mini-Warehouse	A zone containing warehouses suitable for individual storage.	2	0.2%
RV Park	A zone containing recreational vehicle parks.	5	0.5%
Public	A zone containing properties owned by public and quasi-public agencies.	52	5.6%
Total		935	100.0%

Map 7 also shows the city's UGA Reserve. Prior to 2009, this approximately 78-acre area was included in the city's UGA. In 2009, the County Council shifted this area into Reserve based in part on concerns that were raised related to potential impacts from sediments from Swift Creek that contain naturally occurring asbestos. This area is planned for future residential development, and the city anticipates that the area will need to be shifted back into UGA status during the next major update of the comprehensive plan.

3.9 Land Capacity Analysis

This section presents an analysis of the supply of land available to accommodate growth within the existing city limits and urban growth area. The land capacity analysis detailed methodology utilized to complete this analysis was developed by county planning staff working in collaboration with planners from the seven cities. The analysis starts with the gross acreage in each zone, then eliminates those parcels that are fully developed. Acreage within each parcel that is likely to be undevelopable due to the presence of critical areas, such as wetlands and flood corridors, are then subtracted. Additional reductions in developable acreage are then applied based on factors such as infrastructure needs and market factors. The resulting acreage is referred to as net developable acreage. This net acreage is then converted to population and employment growth capacities using factors that include assumed residential densities, occupancy rates, average persons per dwelling unit, floor area ratios and employment densities. The results of the land capacity analysis are presented in Table 3-3, which shows that the current city limits and UGA have a population growth capacity of 308 persons and an employment growth capacity of 219 jobs.

Table 3-3: Land Capacity Analysis Results (City and UGA)

Use Category	Total Acreage	Net Developable Acreage	Population Growth Capacity	Employment Growth Capacity
All residential zones	118	23	308	0
All commercial zones	43	11	0	131
All industrial zones	202	33	0	88
Totals	363	67	242	219

Source: County Land Capacity Analysis, 2025.

3.10 Future Needs

As stated in the community vision, Sumas intends to promote growth that is balanced between the three major categories of land use.

Residential. In computing the demand for residential land, a value of 2.82 persons per household is used for the Residential, Low and Residential, Medium zones and a value of 1.82 persons per household is used for the Residential, High-Density zone, matching the U.S. Census Bureau's

American Community Survey from 2023. Assumed densities of 3.0, 4.5 and 10.0 dwelling units per net developable acre are used for the Residential, Low, Residential, Medium and Residential, High-Density zoning districts, respectively.

The population projection in Chapter 2 anticipates that a total of 1,000 newcomers must be accommodated in the period between 2023 and 2045. At an average of 3.13 persons per household and an occupancy rate of 92 percent, the newcomers can be accommodated in 294 households.

The city's Floodplain Management Plan calls for the creation of two Special Flood Corridors that will traverse existing residential areas. The locations of the corridors are shown on Map 4. These corridors are intended for conversion to open space in order to provide conveyance channels that will then reduce flood impacts in the remaining parts of town. There are 47 existing homes located within the corridors. To accommodate the relocation of these residents, the city's land supply would need to be increased by this amount; however, the conversion of these areas to open space has not been incorporated into the land capacity analysis at this time but should be revisited during future updates.

The land capacity analysis results revealed that 242 people can be accommodated in the current city limits and UGA. This capacity is not sufficient to accommodate the population growth allocation identified in chapter 2. To remedy this, the City has expanded the boundaries of its UGA for the purpose of expanding Sumas City Limits to accommodate additional growth in the future.

Commercial. Relative to its size, Sumas contains a large traffic-oriented business sector, and residents see little need for more retail development that caters solely to passers-through. However, residents describe a need for commercial development oriented toward local customers (e.g., florist, hairdresser, dentist), but also dependent on Canadian traffic. 7.6 acres south of Front Street were rezoned in 1998 in order to create a location for the desired retail development. In addition, a Business-General zone has been established north of Front Street between Cherry Street and Sumas Avenue that could be converted from residential to commercial use over time to meet this type of need.

Truck traffic volumes at the Sumas port of entry have dramatically decreased as a result of the closing of Land Ports of Entry (LPOEs) to all but essential workers as a response to the deadly Coronavirus Pandemic. Prior to the Pandemic, Sumas saw an average of 500-600 trucks per day head south through Sumas. In 2023, that number was reduced to roughly 390 trucks per day. This, however, is a major improvement to the conditions of border crossings as the closure was lifted. Despite the recent decline in crossings, the City still believes that Sumas is a reasonable location for a large truck plaza, including a gas station, restaurant, washrooms, mechanic bays, and parking areas. Such a facility has a footprint of about 20 acres, and there is no parcel of that size available within town adjacent to the highway. Such a plaza would need to be located in the UGA.

According to the land capacity analysis, the combined city and UGA includes capacity to support approximately 550 new jobs. This is enough capacity to accommodate the 500 commercial jobs

anticipated over the planning period.

Industrial. Relative to other small towns, Sumas contains a variety of existing industrial firms. Residents generally support the need for further industrial expansion. Sumas acknowledges that it is well positioned to accommodate certain kinds of industrial development because of factors such as: proximity to major truck and rail transportation facilities; existence of a 24-hour border crossing station; availability of water and electric power; and proximity to major gas pipelines. Sumas also acknowledges the economic goals and policies developed by Whatcom County in response to county-wide needs and visions.[1] Those goals and policies support the development of a more diversified economy that contains a broad base of industrial employers, some of which will preferably be located in the eastern part of the county to provide job opportunities for local residents. In recognition of all these factors, Sumas plans to accommodate substantial industrial development. Desirable industries include those dependent upon the identified factors unique to Sumas yet requiring relatively little sewer service. Examples are intermodal transfer facilities (such as truck-rail or pipeline-rail), warehousing, manufacturing, and electric co-generation.

The land capacity results indicate that the city's industrial area has sufficient capacity to accommodate approximately 88 jobs over the planning period. The city is planning on needing to accommodate 450 new industrial jobs through 2045; therefore, at some point the city will need to consider either shifting land from commercial to industrial or working with the county to expand the Sumas industrial area. The most likely expansion area would be to the west of Barbo Road adjacent to Halverstick Road.

Public. Sumas owns a 9-acre park that includes a rodeo ground, two softball diamonds, a concession stand, and a restroom building (*see blue "Public" zone at south of town on Map 7*). The park abuts what used to be South Cherry Street, a local street that was completely rebuilt in 2006 due to the new alignment of SR9. This new highway segment is an all-weather limited-access facility capable of supporting the growing volume of truck traffic that crosses to Canada through Sumas. The highway realignment resulted in impacts to the park. The main impact was loss of parking.

In 2007 Sumas expanded the park into an undeveloped area immediately adjacent to the east, thereby establishing access to the park from Hovel Road. A portion of the park was converted to off-street parking for rodeo contestants, who arrive with their stock in large trailer rigs. The new 17-acre park includes two baseball diamonds with the potential for two other diamonds, together with associated parking and stormwater management facilities. With the completion of the new ball fields, no additional land will be needed for park purposes.

Overall demand. The Sumas UGA designated by Whatcom County in 2009 and maintained in 2016 no longer contains enough acreage to meet Sumas' needs. If residential development continues to occur, then Sumas will soon run out of room for any more residential and commercial growth. The same goes for the Industrial District. Given that the city had already showed insufficient industrial land to meet anticipated demand since 2016, additional land may need to be added to the UGA.

---

[1] See chapter 7 of Whatcom County Comprehensive Plan, particularly policies 7A-1, 7A-6, 7A-8, 7K-4, 7K-6.

3.11 Sizes, and locations of proposed zones

Map 8 shows proposed future zoning for Sumas and the UGA. Table 3-4 shows the size of each proposed zone. This table can be compared to Table 3-2 to see what is gained with the proposed zoning in the UGA and the site-specific zone changes discussed in the next section.

Table 3-4: Future Zoning (City and UGA)

Zoning Designation	City (acres)	UGA (acres)	Total (acres)	Percentage
Residential, High Density	171	0	171	9.7%
Residential, Medium Density	158	444	602	34.1%
Business, General	45	0	45	2.5%
Business, Traffic-Oriented	18	60	78	4.4%
Business, Low Impact	4	0	4	0.2%
Industrial	377	132	509	28.8%
Open Space/Agriculture	100	180	280	15.8%
Public	60	11	71	4.0%
RV Park	5	0	5	0.3%
Mini-Warehouse	2	0	2	0.1%
Total	940	827	1767	100.0%

3.12 Neighborhood-specific discussion of zoning

Locations of zones are established based on the geographic attributes of the land as related to goals and policies described elsewhere in this plan. The following area-specific discussion is linked to Map 8 -- each numbered area listed below has a corresponding number on the map. Discussion is centered upon areas where zoning changes are proposed, significant future development is anticipated, or other unusual circumstances exist.

a) *Residential area north of Kneuman Rd.* This 110-acre area is now zoned Open Space/Agriculture, Low-, Medium-Density Residential.. The area includes a ridge of high ground extending west from Moe's Hill. The ridge is partially forested and in certain places slopes so steeply as to make development unlikely. Good views are obtained from the crest of the ridge.
At the south base of the ridge, the area includes wetlands and peat soil and is partially within the flood plain. Sumas Creek flows along the south boundary of the area, in the Kneuman Road ditch. The city's main potable well field is located at the far western end of this area, and the zone of contribution to the wells includes much of the area west of Barbo Rd. A major water line runs along the north edge of the area from the well field to the reservoir. Open Space/Agricultural zoning remains appropriate in the area closest to the well field. Residential zoning continues to be appropriate for the remainder. Along the high ridge, Medium-Density zoning will remain. On the low ground, despite the transition to Medium-

Density zoning, the existing area adjacent to Barbo Road will remain as critical areas in recognition of environmental limitations (peat soils, wetlands, and floodplain) and the character of the neighboring uses.

b) *Triangular wedge between Kneuman Rd. and the Lynden rail spur.* This 99-acre area is now zoned Open Space/Agriculture and Industrial. The Ag-zoned area to the north contains peat soils and is entirely within the flood plain. Sumas Creek flows from the well-field springs through the Kneuman Road ditch along the north boundary of the area. The Creek has good potential for enhancement of fish habitat, and the peat soils are well suited to conversion to wetlands. The owner has developed a portion of the site as a wetland mitigation bank. Open Space/Agricultural zoning will remain to support continued development of the wetland bank. Much of the mitigation area is included within the Natural System Protection Area overlay zone.

   The area has 3,000 feet of railroad frontage and is accessible from Barbo Road and Bob Mitchell Avenue. Barbo Road and Kneuman Road are substandard roads not now capable of supporting industrial traffic. A heavy haul road could be extended from Bob Mitchell Avenue into the area from the east in order to provide heavy load access. The area can be served by gravity sewers. Main water and electric lines run along Barbo Road and are also present on Bob Mitchell Ave. A new water line from Barbo Road to Bob Mitchell Way is needed to provide industrial fire-flow to the area and to provide system redundancy. The cost of all necessary infrastructure improvements in this area should be borne by developers and/or outside sources such as CERB and the Whatcom County EDI fund. Industrial zoning will be retained in this area.

c) *Area west of B-N main line straddling West Front Street.* This is the major industrial area within the city. The area contains several wetlands (including a category II wetland proposed as a Natural System Protection Area), and most of the area lies within the floodplain. A swathe at the east is included in the Special Flood Risk Zone. The area has 6,000 feet of frontage on the railroad as well as 4,000 feet of frontage on West Front Street (formerly SR9). A non-potable water line, a potable water line, and a major power line extend along W. Front Street, and sewer service is available throughout. The area is served by a haul road capable of supporting Canadian-weight trucks. Industrial zoning will continue in this area. Environmental constraints limit development in some of the area, but other portions are capable of supporting major industrial facilities.

d) *Area south of city limits.* This 148-acre area includes approximately 82 acres that have been annexed into the city, with the remainder zoned Agricultural in the county and in active farm use. Part of the area annexed into the city was utilized to develop the new ball fields and a 48-lot residential subdivision just south of Bone Creek adjacent to Hovel Road. Of the remaining acreage, 25.8 acres adjacent to SR9 are within the UGA and 40 acres adjacent to Hovel Road are designated UGA Reserve by the county. The area consists of large parcels and is largely protected from flooding by the railroad embankment and state highway running along the west boundary. The culverts beneath the railroad are the path by which Nooksack flood waters reach this area, and only 20 percent of the area is contained within the 100-year floodplain. This area contains the largest chunk of non-flood-prone land contiguous

to Sumas. The area is served by Hovel Road, which is classified by the county as a local road, but which carries much north-south traffic to town. The B-N main line and SR9 run along the west boundary of this area. The realigned SR9 is a limited access highway, and it is only possible to access it via widely separated, intersecting streets or driveways. The backbone street network within this area should therefore be east-west streets connecting Hovel Road to SR9. Provision of sewer service should not be problematic because of the new lift station that was constructed in conjunction with the new ball fields. Main water lines already extend south along Hovel Road and SR9. East-west loop connections between these lines are needed to provide service within the area. Public zoning is proposed in the area occupied by the new ball fields. Medium-Density Residential zoning is proposed for the remainder of the area, with the exception of a 25.8-acre parcel. Given its frontage upon the new highway, this parcel is recognized as a viable location for a large, full-service truck stop. If the entire parcel can be developed for this purpose by a single owner, the development would be consistent with this plan. The parcel should otherwise be developed as Medium Density Residential land. An 8-inch high-pressure gas line traverses the area, and the intent of City is that residential lots be prohibited within 50 feet of the gas line easement.

e) *Parcel east of Hovel Road, south of Bone Creek.* This 10-acre parcel was annexed into the city but is still in active farm use. The eastern part of the area is a low flood-prone wetland continuous with Bone Creek and within a Natural System Protection Area. The western part adjacent to Hovel Road has no environmental limitations and is suitable for development. An 8-inch city water line runs along the west property line (Hovel Road). City sewer will be extended to the southwest corner of this parcel as part of the Hovel Estates subdivision. Medium Density Residential zoning is in place and should be retained.

f) *Residential area south of Front Street and north of Bone Creek.* This area has been fully developed with a combination of single-family, duplex and multifamily housing.

g) *South commercial zone between Cherry Street and Sumas Avenue.* This area was zoned for General Business after previously being zoned for residential use in an effort to increase the buildable commercial space within the City. However, very few (if any) businesses have moved into this area, leaving the remaining residences to exist in a state of perpetual non-conformity with this comprehensive plan, and with the development regulations pursuant to their zone. After years of no commercial growth in the area, steps must be taken to bring the existing residences out of their perpetual state of non-conformity while still continuing to provide extra space in the event of future commercial growth.

h) *Minor zoning changes.* There are several instances of illogical zone boundaries and designations throughout town as noted below and as marked on Map 8:

   1) *Single-Family Residential uses.* Due to recent efforts to increase density within urban areas, the City is proposing to repeal our Single-Family Residential zone, which exists in small minor districts dotted throughout the city. All parcels currently residing within the Single-Family Residential zone would be redesignated into the Medium-Density residential zone, thereby lowering the minimum lot area from 10,890 ft^2 to 7,200 ft^2 and allowing duplexes as a conditional use.

   2) *Agricultural parcel south of Johnson Creek.* This Agricultural parcel is located south of the go-kart track, adjacent to the Industrial zone. Johnson Creek runs through the parcel. The portion of the parcel north of the creek is proposed to be rezoned to Industrial to

allow development on the area not limited by the shoreline setback and the special flood risk zone.

3) *Mitigation Site south of RV Park.* When the re-alignment of the state highway was completed, the Washington State Department of Transportation created a mitigation site just south of the RV Park to accommodate the relocation of Bone Creek. Development of this approximately three-acre area is limited by a recorded covenant. The zoning of this area will remain Open Space/Agriculture.

4) *Area between SR9 and Hovel Road South of Front Street*. In 2023, a roughly 2.5-acre site located between SR9 and Hovel Road south of Front Street received approval from the City Council to be rezoned from General Business to High-Density Residential, in order to allow for an 18-unit residential development that is currently in the pre-construction stage. Since the developer only applied for one 2.5-acre parcel to be rezoned, it was the only parcel to do so. However, there are two residences located adjacent to the site that are still zoned for General Business, and the property owners have requested their zoning to change to High-Density Residential as a part of this Comprehensive Plan update. The City concurs and is also recommending High-Density Residential zoning for this area.

3.13 Long-Range Land Use Plan

While not required pursuant to the GMA, a long-range view of the Sumas environs is presented here. The foregoing discussion establishes that the designated UGA is adequate to contain planned growth in the coming 20 years. However, certain external factors could limit the usefulness of parts of the UGA and/or create the need for an adjustment to the UGA. Three likely factors are discussed below, each labeled with numbers corresponding to an area on Map 8.

a) *Unavailability of UGA Reserve area on the east side of Hovel Road.* The family that owns the majority of the land within the UGA and UGA Reserve operates a large dairy farm. They have invested heavily in expansion of the dairy, and the bulk of the investment has been in facilities located on the east side of Hovel Road. While it is desirable for them to allow annexation and development of the undeveloped land west of Hovel Road, redevelopment of the east strip would severely limit the viability of their entire dairy operation. The property owners are not likely to pursue annexation and development of the 43 acres of land east of Hovel Road. Thus, the City is proposing to remove this area east of Hovel Road from the UGA Reserve.

b) *Extension to the area south of city limits.* Although the area south of city limits described above are still not annexed, major depressions in land capacity have led City officials to propose that more land area be added to the UGA. One of those areas is an extension to the area south of city limits. This new area extends an additional quarter mile to the south, which would add another 74.6 acres to the UGA. In exchange, the City is proposing to remove the 38 acres of the current UGA Reserve that are east of Hovel Road. This area is where the headquarters of the local farm operation is located and is not very likely to be given up for annexation. The two parcels along SR9 (16 and 18 acres respectively) are proposed for commercial use, although the eastern extents of those two parcels may be converted to residential use if the entire parcel is not taken up by commercial use.

c) *Sumas Industrial District.* Map 6B shows a number of "Vacant" industrial parcels. However, several of these larger parcels that are ready for development are owned by landowners who have so far been unwilling to sell and/or develop the land, leaving it vacant and devoid of use. If this trend does not change soon, Sumas will have to find other areas for industrial development to occur.

d) *Expansion Area west of city limits.* Sumas has a number of issues related to future growth that all interconnect with one another. The first barrier to future growth is the lack of residential land capacity. See the Land Capacity Analysis section of this chapter for more information. It has been almost 20 years since the City of Sumas last annexed land or expanded its UGA, meaning all residential, commercial, and industrial development that has occurred in that time has been infill. Soon, the City will run out of all remaining infill potential and Sumas will not be able to grow its population. To overcome this hurdle, the City is looking into expanding its UGA into adjacent areas in order to provide more buildable land for future development.

There are two major barriers to the City's proposed expansion of its UGA boundaries. The first major barrier is the GMA requirement that UGA boundaries cannot be expanded into areas located within the 100-year floodplain. There are a few exceptions to this requirement. The main exception that the City aims to pursue is that a UGA boundary can be expanded into a floodplain if the area located in the floodplain were to remain as open space. Any areas of the expanded UGA not located within the floodplain may be developed upon. This exception has caused the City to look into expanding the UGA west of city limits, along Halverstick Road, that would go past May Road. See Map 8 for a visual representation of this proposal. This area increases in elevation the farther west it goes, meaning that much of the area exists outside of the floodplain that surrounds Sumas. However, there is a large swathe of area immediately west of Barbo Road that would be located in the floodplain and would have to remain as open space in order for the entire proposal to work. As the area is currently used for agriculture, the City proposes that this land stay as such.

The rest of the expansion area is also zoned for agriculture by the County, but the actual use of this land does not match its zoning. Much of the land located within the expansion area is divided into large rural residential properties, many of which include hobby farms with gardens and small amounts of livestock. These properties are not used for significant commercial agriculture and are thus not a priority for the State or the County to preserve. However, GMA regulations addressing agricultural land preservation means that areas zoned for agriculture need to go through a de-designation process in order to be rezoned. This de-designation process is quite complex and is often unsuccessful. However, given Sumas' dire population growth situation, the city is willing to try to go through the process.

A majority of the expansion area west of city limits is proposed to be zoned for Medium-Density Residential use. However, the portion of the expansion area south of Halverstick

Road, labeled as expansion area 9 on map 8, is proposed as an extension to the City's Industrial district which, as discussed above, is also running out of buildable areas. The farthest extent of the expansion area, labeled as area number 10 on map 8, is the only portion of the expansion area actually used for significant commercial agricultural purposes. This land is owned by a local berry farming company which owns farmland all over the Nooksack River Valley. Although this portion is commercially significant, it is not the main portion of the berry farming company's operation, and thus more likely to be annexed in the future. Because of this, the City is proposing for this are to be added to the UGA Reserve.

3.14 Open Space and Physical Activity

Open space

Based on factors such as zoning, environmental limitations and planned capital improvement projects, there will be a substantial amount of open space in the city at the end of the planning period. Some open space will result from development of recreational facilities, but most will be a by-product of environmental regulations such as the flood ordinance, the critical areas ordinance, the shoreline management program, and the wellhead protection program.

Map 12 shows the expected locations of open space within the city and surrounding area. The areas adjacent to Johnson Creek, Sumas Creek and the Sumas River will remain as open space because of development restrictions related to shorelines, wetlands, and flood-prone areas. An area north of the city wells will remain as open space because it lies within the zone of contribution to the city wells. Agricultural areas, where development is limited due to the presence of the flood risk corridor and the special flood risk zone, are also shown as remaining in open space.

Finally, it is important to consider the conditions outside Sumas city limits. The city is entirely surrounded by land zoned agricultural within Whatcom County (see areas labeled "AG" on Map 12), all of which is designated as agricultural resource land of long-term significance. Nearly all of these lands are in current use or open space tax programs, which strongly support continued use for agriculture or open space.

Open space will also be maintained between Sumas and the nearest urban growth area, the City of Nooksack that lies seven miles to the southwest. All of the area between these two cities is zoned for agricultural use by the county and will ,therefore, remain in open space.

Planning approaches to increase physical activity

Sumas has established several approaches to encouraging increased physical activity among its citizens. These include:

- Requiring the construction of sidewalks within all new subdivisions
- Planning for interconnections between neighborhoods
- Planning for a compact urban commercial area, including establishment of areas where provision of off-street parking is not required
- Establishing higher density residential areas at locations surrounding the downtown

commercial core and along the major transit route through town
- Maintaining existing park facilities that include ball fields, tennis and basketball courts, play structures, walking trails and open space
- Maintaining public access to Johnson Creek to accommodate fishing and other water-related recreational activities
- Planning for and developing additional park, recreation, trail and open space facilities
- Securing easements for public access to off-street pedestrian trails

Goal 3.1: To support physical activity for the citizens of Sumas through implementation of a combination of regulatory and non-regulatory means.

Policy 3.1.1: The city should continue to require the development of sidewalks and other pedestrian ways as part of approved subdivisions.
Policy 3.1.2: The city should work with local property owners and developers to establish and increase pedestrian connections throughout the city.
Policy 3.1.3: The city should utilize local zoning designations to encourage pedestrian access to commercial areas from surrounding residential areas.
Policy 3.1.4: The city should maintain and expand access to existing park, recreation and open space areas.
Policy 3.1.5: The city should work in partnership with private, community groups and state and local funding agencies to develop additional park and recreation facilities.

3.15 Essential Public Facilities

"Essential public facilities" include those facilities that are typically difficult to site, such as airports, state education facilities, state or regional transportation facilities, regional transit authority facilities, state and local correctional facilities, solid waste handling facilities, and in-patient facilities, such as substance abuse facilities, mental health facilities, group homes, and secure community transition facilities.

A major public facility of regional significance that is currently under consideration is the proposed construction of new jail facilities within Whatcom County. The voters passed a funding mechanism whereby cities contribute to the capital cost of the facility through establishment of a countywide sales tax.

The county-wide planning policies contain a number of policies related to the siting of essential public facilities (see Appendix IV). The city has adopted the countywide planning policies and will continue to participate in their implementation in relation to the siting of the new jail facility and other essential public facilities when proposed. The city also adopts the following goal and policies related to essential public facilities:

Goal 3.2: To cooperate with other federal, state and local agencies in planning for and siting essential public facilities.

Policy 3.2.1: When the county or a federal, state or regional government initiates the process of planning for the siting of an essential public facility that will serve or impact through its construction the citizens of Sumas, the city should become an active participant in the processes set forth by the initiating agency.

Policy 3.2.2: The city should incorporate expenditures related to the siting of essential public facilities into its capital facilities planning and annual budget processes.

Policy 3.2.3: The city comprehensive plan and development regulations shall not prohibit, nor shall they be construed to prohibit, the siting of essential public facilities.

3.16 Goals and Policies

Sumas adopts the following goals and policies pertaining to land use:

Goal 3.3: To encourage a land use pattern that supports a balance between residential, commercial and industrial development while protecting and enhancing the natural environment and quality of life enjoyed by local residents.

- Policy 3.3.1: The city should establish well-defined areas within which particular land uses are planned to occur.
- Policy 3.3.2: Wherever possible, the city should avoid creating conflicts between incompatible land uses.

Goal 3.4: To encourage a mix of residential housing opportunities that can meet the needs of current and future residents.

- Policy 3.4.1: The city should establish residential areas that accommodate low-, medium-, and high-density neighborhoods.
- Policy 3.4.2: The city should encourage in-fill within existing neighborhoods.

Goal 3.5: To encourage a mix of commercial businesses that can meet the needs of both local residents and those passing through town.

- Policy 3.5.1: The city should establish centrally located commercial areas within walking distance of most residents.
- Policy 3.5.2: The city should limit the proportion of the overall commercial area intended to serve the traveling public.

Goal 3.6: To encourage a mix of industrial businesses that can provide jobs and support the local tax base.

- Policy 3.6.1: The city should establish an industrial area that is geographically separated from residential neighborhoods.
- Policy 3.6.2: The city should encourage industrial businesses that increase employment opportunities over those that include low employment densities.

Goal 3.7: To protect the natural environment and increase recreational opportunities for local residents.

- Policy 3.7.1: The city should establish regulations to protect the functions and values of

the natural environment, including wetlands, rivers, streams and other priority habitats.

- Policy 3.7.2: The city should develop and maintain parks and other recreational amenities to serve local residents.

4 Capital Facilities Element

This chapter is a required element of a comprehensive plan developed to meet the provisions of the GMA. This element is crucial because it serves as a gauge of the practicality and feasibility of the other elements. Essentially, this element reveals which public facility projects are required in order to accomplish the development described in other elements and also proves that the city has the financial resources to undertake those projects.

The GMA defines public facilities as "streets, roads, highways, sidewalks, street and road lighting systems, traffic signals, domestic water systems, storm and sanitary sewer systems, parks and recreational facilities, and schools." (RCW 36.70A.030(12)). This element includes a discussion of each of these categories, although the transportation-related categories are all grouped together. In each section, the existing status of the system will first be described, and future needs will then be discussed. Preceding these sections is a presentation of Sumas' goals and policies related to capital facilities, as well as a discussion of the planning assumptions developed in other chapters that are pertinent to the analysis presented in this chapter.

4.1 Goals and Policies

Sumas adopts the following goals and policies pertaining to capital facilities:

Goal 4.1: To provide capital facilities consistent with statutory requirements and with the other elements of this plan.

- Policy 4.1.1: The city shall accord highest priority to those projects required by statute or necessary for the preservation of public health and safety.
- Policy 4.1.2: The city shall develop capital facilities in a manner that directs and controls land-use patterns and intensities in accordance with the land-use element of this plan. As required by RCW 36.70A.070, the city shall reassess the land-use element if funding is unavailable for the capital projects needed to support a planned use. Development shall be allowed only when and where there are facilities and services available to serve that development.

Goal 4.2: To allocate the cost of a facility fairly among those that benefit from the facility.

- Policy 4.2.1: Long-term borrowing should be used to pay for facilities that will benefit more than one generation.
- Policy 4.2.2: General governmental revenues should be used to pay only for facilities of general benefit. Other financing methods such as connection fees, utility rates, LIDs, and revenue bonds should be used to pay for facilities that benefit a narrower group.
- Policy 4.2.3: Facilities providing benefit only to a new development should be paid for by the developer.
- Policy 4.2.4: Facilities providing benefits to both existing residents and newcomers should

be paid for by both groups, with each group paying a share proportional to their corresponding benefit. Connection fees and impact fees shall be based upon this principle of proportional benefit.

Goal 4.3: To build and operate facilities as efficiently as possible.

- Policy 4.3.1: A planning process should precede all major capital expenditures. This capital facilities element should be the cornerstone of that process. This element should be updated every other year and, with the exception of emergency projects, the capital budget for any given year should include only those projects identified in this element.
- Policy 4.3.2: The city should coordinate the projects in a given location in order to reduce costs.
- Policy 4.3.3: The city should aggressively pursue low-cost funds such as grants and subsidized loans.
- Policy 4.3.4: Major developments should have a full range of facilities, including streets, water, sewer, storm sewer, sidewalks, and neighborhood parks. These facilities should be installed and paid for by the developer and thereafter dedicated to the city.
- Policy 4.3.5: The city should adopt and enforce sensible design and construction standards for capital facilities systems.
- Policy 4.3.6: Existing facilities should be adequately maintained, because maintenance is usually more cost-effective than replacement.

4.2 Sewer System

The following discussion is based on a 2007 study, *Wastewater Treatment Alternatives*, prepared by the engineering firm Wilson Engineering LLC. Map 9 accompanies this discussion.

4.2.1 Existing conditions

Collection**.** Prior to 1972, sewage disposal in Sumas was handled by on-site septic systems. In 1972 a sewage collection system and treatment plant were built. As shown on Map 9, the sewage collection system now consists of over 12 miles of pipe spanning 300 acres, less than half of the incorporated area. The system provides service to 366 single-family residential, 37 multifamily, 66 commercial, and 11 industrial customers. Approximately 22 residences are still on septic tanks.

The system is divided into seven drainage basins, each basin served by a lift station. Generally, gravity mains carry sewage from south to north within each basin, and a lift station then pumps the sewage past a barrier such as a creek or highway. Sewage ultimately reaches lift station 1 in the northeast (i.e., the lowest) corner of town. Lift stations 1, 2, and 3 were rehabilitated in 1998 as part of the project to connect to the Abbotsford sewer and are in good shape. Station 5 was installed in 1997 in order to serve the western part of the industrial zone and is in good shape. Station 4 was installed in the mid to late 1980s, at the same time that the Sumas industrial park

was developed and received a major upgrade in 2005. Station 4 is in good condition, with a design capacity sufficient to accommodate new growth through the planning period. Station 6 is located adjacent to Hovel Road and was designed to serve the City as it expands to the south. It was constructed in 2007 in conjunction with development of the new ball fields and is in good condition. In addition, Station 7 is located at the west end of town near Barbo Road. This station is capable of handling anticipated flows from residential development at the west end of the Moe Hill.

As sewer systems age, they tend to develop leaks, so the condition of a system can be gauged fairly well by measuring the amount of infiltration and inflow (I&I). The system experiences very low levels of I&I in the dry season, despite the fact that most lines are beneath the water table. I&I peaks are only noticed during high rainfall events, primarily during the winter. We therefore know that most of the system is very tight, with some leakage near the ground surface, either in manhole risers or through manhole lids. During major floods, huge amounts of water enter the sewer through flooded toilet fixtures.

Treatment. As of mid-1999, sewage has been treated at a large regional facility in Abbotsford, B.C. The facility is owned and operated by the Fraser Valley Regional District (FVRD). Sumas has a long-term contract with the FVRD and the City of Abbotsford, allowing for conveyance and treatment of sewage and disposal of sludge. The contract, which was extended in 2008, allows for a discharge of 378,000 gpd during calendar year 2015, increasing by 5,500 gpd each year for the coming 4 years, reaching an ultimate ceiling of 400,000 gpd. Existing average daily usage during the maximum month in 2024 was approximately 370,000 gpd, of which 128,000 gpd is attributable to a single customer – the PSE co-generation plant. Surplus capacity is about 30,000 gpd at present.

4.2.2 Future conditions

Collection. The design of the existing collection system makes it economical to extend sewer service to much of the remaining developable land within the city limits. An extension east along Garfield Street supports development in the northeast corner of town. Another extension east along Front Street supports development at the southeast.

Provision of service to the urban growth area and newly annexed areas will generally be more expensive because of natural barriers such as the Sumas River and Bone Creek. Map 9 shows a likely arrangement of trunk lines that could serve outlying areas:

- *South.* In the area between Hovel Road and SR9, west-to-east lateral lines would drain into a lift station (station # 10 on the map) and trunk line on Hovel Road. The trunk line would lead north to the new lift station south of Bone Creek (station #6 on the map) that was constructed in conjunction with the new ball fields. The station pumps sewage a short distance north to station #2's basin.
- *West.* In the new UGA expansion areas heading west, up Halverstick Road, two new lift stations (stations #8 and #9 on Map 9) may be necessary to serve this area. Sewage pumped from these new lift stations would then be pumped into station #5's basin.

The improvements mentioned above will be costly, but the capital cost of such improvements will be borne by developers and therefore need not be included in the city's six-year financial analysis.

Treatment. With an existing surplus capacity of only 30,000 gpd, and with a growth component (under the existing contract) allowing an increase of 22,000 gpd over the coming 4 years, the contract with Abbotsford cannot accommodate future population growth. The City is attempting to find ways to maximize the amount of existing capacity, but it most likely will not be enough. In order to accommodate future growth, the Cities of Sumas and Abbotsford must begin discussions of upgrading the system servicing Sumas. In the spring of 2025, those discussions began. The City of Abbotsford will be updating their wastewater master plan in 2028. By that time, the two cities should have a plan to upgrade the Sumas system to accommodate our future growth for the next 20 years.

Table 4-1 identifies the 20-year capital improvement projects for the city's sewer system. Estimated costs for city-funded projects have been incorporated into the financial analysis presented at the end of this chapter.

Table 4-1: Sewer System 20-Year Capital Improvement Program

Project #	Project Description, Location and Type	Cost	Year	Funding Source
1	Lift Station 1 – Pump Upgrades	$40,000	2030	Rates
2	Lift Station 2 – Pump Upgrades	$25,000	2031	Rates
3	Lift Station 3 – Pump Upgrades	$25,000	2032	Rates
4	Lift Station 5 – Pump Upgrades	$20,000	2033	Rates
5	Lift Station 7 – Pump Upgrades	$20,000	2034	Rates
6	Lift Station 8 – New Construction	$800,000	2040	DF
7	Lift Station 9 – New Construction	$800,000	2040	DF
8	West UGA – New Sewer System for residential and industrial construction	$1,500,000	2040	DF
9	Lift Station 10 – New Construction	$800,000	2045	DF
10	South UGA – New sewer system for residential and commercial construction	$1,000,000	2045	DF

4.3 Water System

The City recently updated its comprehensive water system plan as part of this comprehensive planning effort with the assistance of the Cascade Engineering Group. The plan was approved by the state Department of Health in December of this year. The following information is based on the updated water system plan, which is incorporated by reference as a component of this capital facilities element. Map 10 shows the locations of the various components of the city's water system. These include the two city wellfields and a system of transmission and distribution mains.

4.3.1 Existing conditions

Source. The source of potable water for the City is the Sumas Wellfield, which contains five wells. The wells draw water from the Abbotsford-Sumas aquifer, a glacial sand and gravel upland covering the north end of Whatcom County and extending into lower British Columbia. Although artesian flow conditions exist at each well, submersible pumps or booster pumps are installed to achieve adequate pressure. The wells supply two distinct distribution zones. Two of the wells are used to supply wholesale customers south of town including the Nooksack Valley Water Association (NVWA) and the City of Nooksack. Three of the wells supply Sumas itself and the Sumas Rural Water Association (SRWA), which is located east of town. The two distribution zones normally operate independently, but an intertie is available to allow emergency supply from one system to another.

The City also operates the May Road Wellfield, tapping the same aquifer, there are two wells in the well field. One serves our industrial customers, and the other is tied to the Sumas distribution system.

In 2015, Sumas received approval from the Department of Ecology allowing an additional point of withdrawal under one of the city's water rights. The new point of withdrawal is at the location of one of the Meadowbrook Water Association (MBWA) well fields. Under the terms of a supply agreement entered into in 2015, the city supplies water to MBWA by allowing the association to withdraw additional water from its own wells, but under the Sumas water right. In this way, Sumas can supply the water without actually needing to pump or pipe the water from the city system. Consistent with the Sumas agreement, MBWA intends to supply water to Northwood water association and Northwood Park water associations, both of which have issues related to water quality from their current wells. In the future, MBWA may also supply wholesale water to the Everson water association and the Hampton water association, which are located just north of the city of Everson.

Treatment. Groundwater from the Sumas Wellfield is not "under the influence of surface water," so no filtration is performed. Chlorination is normally not performed, but equipment is available to inject chlorine into the distribution mains near the wellfield when bacterial testing indicates the need. However, the need arises infrequently. Perhaps once every couple of years is coliform detected somewhere in the combined distribution network of Sumas and its wholesale customers, always related to construction projects. Coliform has never been traced back to the wells themselves.

Storage. Sumas owns a 500,000-gallon reservoir located at the top of Moe's Hill- A second 500,000-gallon reservoir was built in 2001 next to the existing reservoir and is owned by the SRWA. Storage within the Nooksack/ NVWA zone is accomplished at reservoirs jointly owned by those entities.

Distribution. The Sumas City distribution system consists of 94,000 linear feet of pipe ranging from 1 to 12 inches in diameter. Major lines lead from the Sumas Wellfield along the Canadian border to the reservoir, and along Barbo Road and Halverstick Road to the south end of Cherry Street. A network of smaller pipes distributes water throughout the developed part of town.

4.3.2 Future conditions

Water Rights. Sumas has obtained and perfected several water rights over the course of many years. Table 4-1 shows that the maximum withdrawal available to the city under all of its water rights equals an instantaneous flow of 3,611 gallons per minute (gpm) and a total annual withdrawal of 3,415.5 acre feet (af). Of these totals, up to 298.8 gpm and 328.5 af must be returned to an adjacent tributary to Johnson Creek as mitigation necessary to maintain base flow levels in the creek. Table 4-1 (which updates and extends Table 2-1 from the City's water system plan from the year 2009 to 2045) presents information regarding planned water usage within the city and by its wholesale customers through the year 2045. As shown in the Table 4-1, based on existing consumption patterns, projected growth in consumption, and current and planned water supply agreements, Sumas has sufficient water rights to supply its retail and wholesale customers through 2045.

Table 4-2: Water Usage and Water Rights

Water Demand	2009/2010		2023		2045	
	Instantaneous Flow Rate[1] (gpm)	Annual Usage (Acre-ft)	Instantaneous Flow Rate[1] (gpm)	Annual Usage (Acre-ft)	Instantaneous Flow Rate[1] (gpm)	Annual Usage[2] (Acre-ft)
City of Sumas	499	198	438	180	665	309
Cogen[3]			218	88	337	136
Cogen - PSE User Agreement	800	969	800	969	800	969
SRWA	1,000	352	1,004	405	1,518	612
User Agreement	500	470	500	470	500	470
Nooksack & NVWA	500	614	1,510	609	2,239	903
Nooksack & NVWA User Agreement	971.5	768.6	971.5	768.6	971.5	768.6
Nooksack			397	160	672	271
Nooksack User Agreement		199		199		199
NVWA			1,113	449	1,567	632
NVWA User Agreement		569.6		569.6		569.6

Meadowbrook Water Association			712	287	1,037	418
User Agreement	0	0	450	400	450	400
Less Mitigation			(81)	(72)	(81)	(72)
Net Usage			369	328	369	328
TOTAL DEMAND	1,999	1,164	3,882	1,569	5,796	2,378
TOTAL SUMAS DEMAND WITH USER AGREEMENTS	2,771	2,406	3,160	2,788	3,387	2,917
DOE WATER RIGHT	Max. Rate (gpm)	Annual Usage (Acre-ft)	Max. Rate (gpm)	Annual Usage (Acre-ft)	Max Rate (gpm)	Annual Usage (Acre-ft)
G1-25171 (Kneuman Rd)	2,250	1,919	2,250	1,919	2,250	1,919
G1-23698 (May Rd #1)	800	449	800	449	800	449
G1-26398 (May Rd #2 & #3)	860	1,376	860	1,376	860	1,376
Sub-Total	3,910	3,744	3,910	3,744	3,910	3,744
May Road Mitigation			-298.8	-328.5	-298.8	-328.5
TOTAL WATER RIGHT	3,910	3,744	3,611	3,416	3,611	3,416
WATER RIGHT MINUS TOTAL DEMAND	1,911	2,580	(271)	1,847	(2,185)	1,038
WATER RIGHT MINUS SUMAS DEMAND & WHOLESALE CUSTOMERS AT USER AGREEMENT	1,140	1,338	452	628	225	499

1 – Instantaneous rate is assumed 4.0 times annual average flow rate for Cogen, Nooksack, NVWA, & Meadowbrook
2 – Assumed growth rates: 2.4% Nooksack; 1.56% NVWA; 1.89% SRWA; Meadowbrook 1.72% per County projections
3 – Cogen usage is assumed to have 2.00% annual growth

Storage. The Sumas water distribution/supply system is divided into two halves, with one half of the system supplying water to city customers and SRWA and the other half supplying wholesale water to Nooksack and NVWA. Water supplied to Nooksack and NVWA does not require storage because the existing city pump system pumps water directly into the NVWA/Nooksack system and into their combined storage tanks. Following construction of the SRWA 500,000-gallon storage tank, the city's 500,000-gallon water storage tank is expected to reach capacity around 2045. At that time, the construction of a new 500,000-gallon storage tank may become necessary.

Distribution. The distribution system will require routine maintenance throughout the course of the planning period. Additional water mains will be needed to serve new development within the

proposed UGA and UGA Reserve areas. The approximate location of these new water mains are shown on Map 10. It is anticipated that all major system extensions to serve the proposed UGA and UGA Reserve areas will be paid for by developers; therefore, although these projects are included in the table below, they are not included in the city's financial analysis.

Table 4-3 identifies the 20-year capital improvement projects for the city's water system. This table includes all remaining projects identified in the city's water system plan. Estimated costs for city-funded projects have been incorporated into the financial analysis presented at the end of this chapter.

Table 4-3: Water System 20-Year Capital Improvement Program

Project #	Project Description, Location, and Type	Cost	Year	Funding Source
1	Hydrant coverage remediation – 1 hydrant on Lawson	Completed		
2	Morton Street hydrant and new loop – Upgrade to 8-inch PVC	$200,000	2028	Rates, DF
3	Lawson Street from Front to Mitchell – Upgrade to 8-inch PVC	Completed		
4	Alley between Mitchell and Morton (Cherry to Sumas) – Upgrade to minimum 6-inch PVC	$275,000	2035	Rates
5	Mitchell Street Line Upgrade (Sumas Ave. west) – Upgrade to 6-inch PVC and loop to Cherry	$450,000	2030	Rates
6	New transformer for Sumas wells	Completed		
7	First Street Line (Sumas to Lawson) – Upgrade to 6-inch PVC	$400,000	2032	Rates
8	Alley between Third and Second (Sumas Ave west) – Upgrade to 4-inch PVC	$300,000	2031	Rates
9	Retrofit Sumas Well Field wells 4R and 5 with larger pumps to meet MDD demand	Not Needed		
10	Moe's Hill pressure zone booster pump with generator	Not Needed		
11	Replace Well 2	Completed		
12	New pump house and controls for Well 4R	Completed		
13	Lawson Street from Mitchell to Garfield – Upgrade to 8-inch PVC	$600,000	2028	Rates
14	Valve remediation – 1 per year for ten years ($10,000 x 10 years)	$100,000	2026-2035	Rates
15	SR9 south of Bowen Rd. to serve UGA – New 8-inch line	$1.3 Mil	2035	DF

16	West UGA – New water mains from Halverstick Rd to Kneuman Rd	$1.5 Mil	2040	DF
16	South UGA – New water mains from SR9 to Hovel	$1 Mil	2045	DF
17	Hydrant remediation – 1 per year for ten years ($10,000 x 10 years)	$100,000	2026-2035	Rates

4.4 Storm Sewer System

Information about this system was provided by the public works director and the city crew. The crew mapped the storm sewer system in order to facilitate capital planning.

4.4.1 Existing conditions

Collection. Sumas has an extensive storm water system consisting of two pump stations, 38,000 lf of drainage line, and 3,000 lf of open ditch. The underground lines range in size from 4-inch to 36-inch, with the larger lines made of concrete and the smaller lines made of PVC, concrete, or clay. Johnson Creek divides the town into two drainage basins. The general layout of the system is shown on Map 11.

In the northern basin, the backbone of the collection system is a 36-inch square concrete drainage line installed by the WPA eighty years ago. This line extends from the railroad tracks through the heart of downtown and then east along Harrison Street to the city limits. The line continues cross-country under farmland to an outfall on the Sumas River.

Most of the northern basins are drained through the WPA line to the Sumas River, but the basin also includes four smaller outfalls directly to Johnson Creek. A pump station is located near an outfall on Gough Street. Generally, the basin drains by gravity through the various outfalls until water levels rise in the rivers. When water can no longer drain by gravity, duck bills are used to prevent creek water from backing up into the system, and the pump station kicks in.

The southern basin is less extensive and not as dependent upon a major trunk: there are fourteen outfalls to Johnson Creek, the Sumas River, Bone Creek, and Sumas Creek. Again, the outfalls are equipped with duck bills to prevent backflow, and there is another pump station (also on Gough Street) that pumps into Johnson Creek during high water.

The existing system works well and there are few areas of town with drainage problems. The collection system requires regular maintenance, particularly those lines with small diameters. Some part of the system is flushed each year, and major line-flushing projects occur twice a decade. The eastern end of the WPA line also has maintenance issues. The line has weakened, and occasionally develops leaks, leading to cave-ins in the outer lying farm fields.

Treatment. As is typical of a small-town system installed decades ago, most residential stormwater is discharged without treatment. Recent subdivisions have been required to incorporate treatment facilities into project plans. Since the mid-1980s, the city has required

commercial and industrial customers to install oil-water separators. The major expanses of pavement associated with gas stations and businesses along Cherry Street all have separators. Property owners are required to maintain the separators, and the city inspects them annually.

Since publication of DOE's *Stormwater Technical Manual* in the early 1990s, Sumas has required installation of stormwater BMPs at new industrial facilities. Both the co-generation plant and the IKO shingle plant have detention ponds as well as bioswales. The Port of Bellingham's industrial area east of Bob Mitchell Avenue is the only industrial site with no provision for stormwater treatment. Stormwater from this site is discharged untreated to Sumas Creek.

In 1997, Sumas adopted an ordinance requiring all new subdivisions to comply with the guidelines established in the 1992 *Stormwater Technical Manual*. As part of the 2016 update of development regulations, the City adopted an ordinance requiring all development and redevelopment to comply with the most recent update of DOE's *Stormwater Management Manual for Western Washington*.

4.4.2 Future conditions

Establish new standards. According to the requirements of the Puget Sound Stormwater Plan, Sumas must adopt a basic stormwater program containing at least the following elements:

- Ordinance establishing minimum stormwater requirements for new developments and redevelopment projects.
- Adoption of a set of technical design standards for stormwater facilities.
- Ordinance establishing an operations and maintenance program applicable to privately owned drainage facilities.
- Adoption of a public education program.

Sumas has at this time complied with the first two listed elements. A more comprehensive ordinance should be adopted once appropriate small-town models become available.

In addition, Sumas coordinates with the recently launched WRIA 1 watershed planning process, a county-wide multi-year process that includes water quality components.

4.5 Public Properties and Buildings

The City owns a number of properties and buildings around Sumas which serve different public purposes. City-owned properties and buildings which have a recreational function will be discussed in more detail in the Parks and Recreation section of this chapter. Below is a list of City-owned property and buildings and their current conditions.

4.5.1 City Hall and Police Department

Sumas City Hall is located at 433 Cherry St. The nearly 4,300 ft^2 facility was converted from an old fire station and, at one point, also contained the Sumas Library. The facility houses four different municipal services: City administration, public works, police department, and municipal court. The facility is split into two separate parcels, with the Public Works Department

located in the second parcel. The Sumas Public Works Department will be described in more detail later in this section.

In the 2021 flood event, Sumas City Hall received significant damage. At one point, the inside was inundated with roughly 3 – 4 feet of standing water. Although damage appeared to be quite severe, no structural damage was found. The repairs to City Hall were mostly cosmetics in nature and took about a year to complete. During the repairs, City officials worked out of portable trailers located on the property. In terms of future projects, the City is looking to possible roofing repairs in the near future.

4.5.2 Sumas Public Works Facility

The Sumas Public Works Facility is directly connected to the Sumas City Hall facility, despite there being two separate parcels. The main facility includes a four-bay garage which houses crew members' work vehicles. Behind the facility is an accessory six-bay garage which houses additional public works vehicles of a larger nature. The facility also includes a small outdoor storage area where public works stores frequently used materials including gravel and construction signage.

Along with City Hall, the Public Works facility was also impacted by the 2021 flood event, with the garage being inundated with multiple feet of standing water. Many of the department's vehicles incurred water damage, and the washing out of the nearby rail line covered the property in roughly three feet of gravel.

4.5.3 Sumas Community Center

The Sumas Community Center is located at 461 Second Street and opened for business in 1990. This 6,500 square foot facility currently houses the Sumas branch of the Whatcom County Library System, the Sumas Senior Center, and the Sumas Food Bank. The Sumas Library is open on Mondays, Wednesdays, and Saturdays. On Mondays and Wednesdays, the library is open from 10:00 am to 6:00 pm. On Saturdays, the library is open from 10:00 am to 5:00 pm. The Sumas Senior Center is open on Wednesdays and Fridays from 10:00 am to 1:00 pm. The Sumas Food Bank is open on Thursdays from 12:00 pm to 2:00 pm.

The facility is split into two separate facilities, one utilized by the Library, and one utilized by the Senior Center and Foodbank. The building itself is owned by the City of Sumas; however, the Whatcom County Library System runs the Library, and the Whatcom County Parks and Recreation Department runs the Senior Center.

In the 2021 flood event, the Sumas Community Center was significantly damaged, and repairs took an approximate year and a half. The facility officially reopened February 15, 2023. Since then, the facility also received a new roof in May 2023.

4.5.4 Sumas Historical Society and Museum

The Sumas Historical Society and Museum is located at 114 Second Street and opened for business in 2017. The approximately 1,400 square foot structure was once a historical home, being first constructed in 1910. The City of Sumas bought the house from its owners in 1996 and

initially used the building as the site of the Sumas Youth Center. Although the Youth Center was initially successful, a lack of community support and volunteers for staffing eventually led to the program's closing in 2014. The Sumas Historical Society took over the facility in 2017 and converted it into a museum, showcasing Sumas' unique history. Following the 2020 and 2021 flood events, the museum was forced to close for repairs and officially reopened in July 2023.

4.5.5 Kneuman Road Laydown Yard

The Kneuman Road Laydown Yard is an auxiliary storage facility for the Sumas Public Works Department, storing both vehicles and materials. The facility was originally used as a greenhouse by the Van Wingerden family who are locally known for their large flower growing operation now located northwest of Lynden. The City purchased the property from the Van Wingerden's in 1996. Within the context of the Sumas Public Works Department, the facility has kept the nickname "The Greenhouse" ever since.

Due to its raised elevation, the Kneuman Road Laydown Yard was not affected by the 2021 flood event. Beginning in 2024, construction of a 4,200 square foot shop began on the property. The primary use of the shop will be to provide additional storage space for the Public Works Department, however the shop will be utilized as a local base of operations during a flood event and serve as an alternate location for administrative staff if City Hall were to ever be flooded again. The shop is expected to be completed in early 2028. Completion of the project is expected to cost roughly $300,000.

4.5.6 Sumas Cemetery

The Sumas Cemetery is located at 9445 Sumas Road, outside of City Limits. The Cemetery is split into two parcels. The first of which is the main portion of the Cemetery, housing a total amount of 2,045 cemetery plots. This portion is divided into three sections, titled North, Center, and South. The second parcel to the north, titled New North, includes an additional 489 cemetery plots. The second parcel also includes additional land set aside for future growth. In the meantime, that land is rented out to the local farmer to be used for agriculture. Table 4-5 below has a breakdown of how many plots are occupied, reserved, and open in each section.

Table 4-4. Inventory of Plots in Sumas Cemetery

Cemetery Section	Occupied Plots	Reserved Plots	Open Plots	Total
North	338	173	97	**608**
Center	393	161	65	**619**
South	771	26	0	**797**
New North	149	132	205	**486**
Total	**1651**	**492**	**367**	**2510**

4.5.7 Sumas Sewage Treatment Plant

The former Sumas Sewage Treatment Plant is located at 620 Harrison Avenue. The plant was used by the City to treat the sewer system until 2008. At that point the plant was old, outdated,

and could no longer support Sumas' growth. The cost to upgrade the plant was determined to be too great, and the City of Sumas decided to approach the City of Abbotsford about having them take the Sumas sewage and treat it at their facility. The City of Abbotsford, having mor capacity to handle Sumas' sewage, was willing to accept and a connection between the Sumas and Abbotsford sewer systems was constructed in 2008.

4.6 Streets and Sidewalks

Please see the transportation element for a discussion of the transportation-related capital facilities in Sumas. That element was originally developed jointly with the Whatcom Council of Governments (WCOG) and was subsequently updated by the city. Chapter 6 includes a discussion of existing conditions and future needs. A discussion of financial viability is included at the end of this chapter.

4.7 Schools

Nooksack Valley School District No. 508 (NVSD) provides public schooling for Sumas as well as Everson, Nooksack, and part of unincorporated Whatcom county.

4.7.1 Existing conditions

NVSD operates five schools as described in Table 4-7. According to criteria used by the state superintendent of public instruction, NVSD has excess capacity at the elementary and middle school grade levels and will meet capacity at the high school grade levels, as can be seen by comparing enrollments to building capacities.

NVSD's facilities have all recently gone through major improvements. The Everson Elementary school was opened in the fall of 1993, and was most recently improved in 2017, as well as the addition of 8 new classrooms during the 2020-2021 school year. The Middle school underwent a major renovation in the 1993-1994 school year, when it was converted from Everson Elementary School to Nooksack Middle School, and it was recently improved in 2017 as well. Nooksack Valley High School also received a major renovation in 2018. The Nooksack Elementary School was opened in 1997 and received a major renovation in 2021 and saw the addition of 12 new classrooms. Sumas Elementary School was completely rebuilt during the 2020-2021 and 2021-2022 school years. The new structure has two stories and has capacity for 280 students. Table 4-7 provides an overview of NVSD's facilities, as well as when they were constructed and most recently renovated. Table 4-8 provides an overview of the capacity of each school cohort as they currently stand.

Table 4-5. Inventory of School Facilities.

School (location)	Grades	Year Built	Substantial Renovation Year
Sumas Elementary (Sumas)	K-5	2021-2022	
Nooksack Elementary (Nooksack)	K-5	1999	2021
Everson Elementary (Everson)	K-5	1994	2021
Middle (Nooksack)	6-8	1947	2017
High (County)	9-12	1956	2018

Table 4-6. Current Capacity by School Cohort.

School Cohort	**Current Enrollment** 2024-2025	**Current Capacity** 2024-2025	**Current Capacity** Surplus / (Deficit)
Elementary	988	1,275	287
Middle	465	580	115
High	517	600	83
Total	1,970	2,455	485

4.7.2 Future conditions

The state superintendent of public instruction provides enrollment projections based on cohort survival (i.e., the progression of students from one grade to the next). The projections show that K-5 enrollment will stay stagnant overall from 988 in 2024 to 965 in 2045, grades 6-8 enrollment will increase slightly from 465 to 505, and grades 9-12 enrollment will increase slightly from 517 to 600. At those growth rates, the NVSD will have excess capacity at all grade levels but 9-12, who will reach capacity at the end of the planning period.

Table 4-7. Future Capacity by School Cohort

School Cohort	Enrollment Projection @ 2030	Enrollment Projection @ 2045	Forecast Capacity @2045	Forecast Capacity Surplus / (Deficit)
Elementary	774	965	1,275	310
Middle	264	505	580	75
High	593	600	600	0
Total	1,631	2,070	2,455	385

At this time, there are no planned improvements for any of the NVSD facilities during the planning period. The district does not have any plans to expand beyond its current facility locations and will only continue to invest in facility improvements as needed. While the district does not have current plans to add additional classroom space, discussions about whether to renovate, expand, or build a new high school will begin prior to the current bonds' full expiration in 2039.

4.8 Parks and Recreation

4.8.1 Development of element

In the summer of 2000, the Mayor directed that a parks and recreation planning process begin, leading to a more detailed parks plan than previously contained in the Comprehensive Land-Use Plan. The city administrator and planning commission therefore completed the planning process described below:

- August, 2000. Introduction of topic at planning commission meeting. Discussion of existing parks facilities and request for commissioners to bring ideas to next meeting.
- September, 2000. Review of existing facilities, solicitation of commissioners' and public's ideas. Decision to conduct community survey.
- October, 2000. Survey prepared and mailed to all residents. (A copy of the survey document is included in Appendix III.) Survey results tabulated.
- November, 2000. Survey results presented to planning commission and public. Discussion of results. Group workshop to tentatively prioritize projects based upon citizen preference, financial viability, and ease of implementation.
- November, 2000. First draft chapter was written and presented to planning commission, lacking CIP and many details. Comments received from commissioners.
- January, 2001. Revised draft incorporated into draft comprehensive plan.
- February, 2001. Second draft chapter presented to commissioners. Group workshop to develop proposed CIP and balance projects with financial capability.

- March, 2001. Third draft chapter presented to commissioners and approved for forwarding to City Council and public review.

4.8.2 Existing conditions

Listed below is an inventory of all City facilities and easements pertinent to parks and recreation. Map 12 shows the locations of the various facilities.

- City park. This 2.3-acre facility is alongside Johnson Creek in the city center. The facility includes picnic tables, a restroom building, and a barbecue gazebo as well as an expanse of maintained lawn adjacent to the creek. The park is the site of various annual events sponsored by service organizations, such as Community Days and Santa in the Park.
    - In 2020, a new water splashpad was installed at the intersection of Third Street and Sumas Avenue, as well as a new playground. In 2021, citing safety concerns due to its deteriorating condition, the city rebuilt the barbecue gazebo using new materials and providing a more open layout.
- City Park North. This 0.5-acre facility encompasses three former residential properties on Second and Third Street between Cherry Street and Sumas Avenue that were acquired by the County and deeded to the city following the 1990 flood event. The properties provide a direct path between the City Park and the basketball, and tennis courts located at Sycamore Park. This facility includes a merry-go-round, a walking path, and a large Willow tree.
- Ball park/rodeo ground. This 9-acre facility is located at the south end of the city. The facility includes two lighted softball fields, restroom facilities with showers, a concession stand, and a rodeo ground used for the Sumas Junior Rodeo and the Bull-a-Rama. The softball fields are used for recreational league play by several groups within the Nooksack Valley, the rodeo grounds are used by riding clubs, and the grounds as a whole are used for occasional meetings and events.
    - In 2023 and 2024, new grandstands were installed at the rodeo grounds to upgrade the seating capacity to roughly 1,500 people. A new announcers booth and sound system were also constructed across from the grandstands.
- New Ball Fields. This 20-acre facility is located southeast of the rodeo grounds and was constructed in 2007. It includes two baseball fields and one soccer field. The facility also includes a gazebo, concession stand/restrooms, a stormwater pond used for the annual Fishing Derby, and a footbridge across Bone Creek.
- Sycamore Park. This 0.8-acre facility is located on the north side of Second Street between Cherry Street and Sumas Avenue. The facility includes a tennis court, a basketball court, and the Sumas Historical Society and Museum. A maintained lawn space separates the basketball and tennis courts from the museum, creating a nice gathering space for events. Since 2024, the basketball courts have been utilized by the Nooksack Basketball and Baseball Booster Club to put on a community 3-on-3 basketball tournament during the annual Community Days event. The tournament has become quite

successful.

  - A letter in favor of naming the park was sent to the city from the Sumas Historical Society in 2024. Previously, the park did not have a name and was colloquially referred to as the basketball and tennis courts. At a meeting on September 23, 2024, the City Council voted in favor of naming the space to Sycamore Park, citing the existence of several sycamore trees at the site.

- Sumas Historical Society and Museum. This 2-story remodeled parsonage house, built in 1891, is located on Second Street within the Sycamore Park grounds. The facility was previously used as a youth center but was taken over by the Sumas Historical Society in 2017. The museum is open two days a week for about four hours a day.
- Sumas Community Center. This complex is on Second Street, east of Lawson Street. The 4,000 sq-foot building was built in 1998 and houses a branch of the Whatcom County Library System, as well as a senior center operated by the Whatcom County Parks Department. The City owns and maintains the building, and the leaseholders operate the programs.
  - In 2023, playground equipment from City Park North was relocated to the 0.2-acre city-owned parcel adjacent to the Community Center complex. The playground was relocated when City Park North was regraded. The playground equipment itself is in good condition.
- Riparian tract. The Port of Bellingham deeded this 1-acre parcel of land to the City in 1998. The parcel straddles Sumas Creek near the north end of Bob Mitchell Avenue. The parcel is not useful for industrial purposes because of environmental constraints associated with the Creek. The parcel contains a deed restriction limiting use to passive recreational activities or riparian enhancement.
- Sytsma farm easement. As a condition of the industrial rezone of the Sytsma farm in 1997, the City received an easement allowing a trail across part of the farm. A 29-acre portion of the farm is earmarked for wetland mitigation and possible relocation/ reconstruction of the stream itself.
- Sumas City Walking Trail. This 2.3-acre property is located on the west side of the BNSF railroad and consists of heavily forested open space with a public walking trail going through it. The trail connects Johnson Street near West Front Street to Van Street near West Third Street. The trail used to be a road connecting the two streets. When the bridge over Johnson Creek failed, the facility was reallocated to a public walking trail. The property that the trail runs through was granted to the City by WSDOT in 2016.

Typical planning standards call for 2.5 acres of community park and 1.5 acres of neighborhood park per 1,000 population. As of 2023, Sumas itself had a population of 1,810, but Sumas is also the major service provider to an unincorporated rural community with an estimated population of 1,300 (based on the 2023 American Community Survey) and encompassing about 35 square miles. For a service population of about 3,135 people, planning standards would therefore call for about 8 acres of community park and 5 acres of neighborhood park. In comparison, Sumas has about 35 total acres of park that can be thought of as either neighborhood or community park (i.e., 1.3-acre Sycamore Park and City Park North, 2.3-acre city park, 20-acre new ball fields, and 5 acres of ball fields within the rodeo complex).

A comparison of typical planning standards supports conclusions that are obvious to local users. First, the existing City parks perform well in their capacity as "neighborhood" parks. The needs of nearby residents are well met, and facilities such as the playground equipment and the tennis courts are not crowded. Second, with the addition of the new ball fields, the community's need for baseball fields is now well met as well.

4.8.3 Survey results

A survey was mailed to approximately 350 households in October, 2000. All ideas generated by planning commissioners and the public during early brainstorming sessions were contained as options in the survey. Most proposed facilities are self-explanatory, but a few must be described:

- Recreation center. This facility would contain an exercise room, weight room, and gymnasium large enough for basketball and volleyball. An indoor pool might also be included in the center, in a separate phase.
- Recreation program. This would be a summer program for local youth with typical offerings such as: sports education using the City's basketball and tennis courts; arts or crafts offerings conducted in the Youth Center building; field trips to local events.
- Expand rodeo. This option would involve expanded use of the rodeo grounds, either through making physical improvements, offering more events, or promoting greater use of the facility for other kinds of events (i.e., reunions, "camp-in" meetings of clubs, etc.).

A copy of the survey document is enclosed in Appendix III. A total of 35 responses were returned, an excellent response rate in comparison to other City surveys. The results of the survey are tabulated below in order of the total number of responses in favor of each choice.

Table 4-8. Prioritization of Desired Park Facilities.

Desired Facility	Priority Assigned to Facilities by Respondents									
	1st	2nd	3rd	4th	5th	6th	7th	8th	9th	Total
Swimming Pool	8	3	3	4	5	1	0	0	0	24
Recreation Center	9	4	3	3	2	1	0	0	0	22
Expand Rodeo	5	4	5	1	3	0	0	0	1	19
Trails	8	2	3	3	2	0	0	0	0	18
Rec. Program	4	5	3	3	2	0	1	0	0	18
Skateboard Park	2	2	4	4	3	2	0	1	0	18
Baseball Fields	4	3	4	0	0	1	0	0	0	12
Soccer Fields	1	1	2	0	5	0	2	0	0	11
Civic Auditorium	2	2	1	0	2	1	0	0	0	8
BMX Park	2	0	0	4	2	0	0	0	0	8
Playgrounds	1	0	3	3	0	1	0	0	0	8
Sidewalks	1	3	1	0	0	0	0	0	0	5

Horse Trails	0	0	1	0	1	0	0	0	0	2
Discontinue Rodeo	0	1	0	1	0	0	0	0	0	2

Respondents had the following additional comments and ideas:

- A trail or sidewalk should link the new Garfield St. subdivisions with the rest of town (2 responses). This project has been completed.
- A neighborhood playground is needed at the new Garfield St. subdivisions (3 responses). This project has been cancelled.
- A sidewalk is needed on Mitchell St. heading east from the school to Victoria St..
- A ballfield complex should contain two 60-foot diamonds and one 90-foot diamond. Infields should be grass, not rock and sand.
- An auditorium could host a community theatre.
- A multi-use arena is needed, with ability to convert to an ice arena.
- A recreation center should contain an indoor jogging track.
- The city has enough playgrounds already.
- Expand the school playground for toddlers.
- Include a climbing wall in a recreation center.
- Build a fishing pond.
- Build a dog-training park.
- Take what we have and make it better.
- Build a wetland park with trails.
- Existing sidewalks need to be kept clean and passable.

4.8.4 Project feasibility analysis

The feasibility of developing various facilities was explored by ranking each facility against a number of criteria. Four projects were omitted from further consideration based upon their poor showing in the survey: horse trails, sidewalks, civic auditorium, and conversion of the rodeo ground to an alternate use. The following matrix shows the results of the feasibility exercise.

Table 4-9. Desired Park Facilities Feasibility Analysis

	Soccer fields	Recreation center	Playgrounds	Recreation program	Pool	Baseball fields	Trails	Skateboard/BMX park	Fishing pond and nature trail

Ranking in survey (L, M, H)	M	H	L	H	H	M	H	H	-
Capital cost (L, M, H)	M	H	L	L	H	M	L	M	M
Operating cost (L, M, H)	M	H	L	M	H+	M	L	L	M
Staffing requirement (L, H, Zero)	L	H	0	M	H+	L	0	0	L
Grant funding likelihood (L, M, H)	M	L	L	L	L	M	H	L	H
Revenue from user fees?	Y	Y	N	Y	Y	Y	N	?	Y
Risk (L, M, H)	M	H	L	L	H	M	L	M	M
Target market (City, Local, Region)	R	R	C	C	R	R	L	R	R
Competition	Sumas, Lynden, Everson	Lynden Y, Everson private gym	-	Lynden Y, Church, misc. leagues	Lynden Y, Bellingham, Abbotsford	Sumas, Lynden, Everson	-	Bellingham	Saxon

Since this survey was completed, increases in prices, safety and insurance policies, and general community opposition to some of these options have led to the City deeming some to be not feasible. These options include: swimming pool, skateboard park, soccer fields, and BMX park. The City will not be pursuing these options in the future.

4.8.5 Goals and objectives

In consideration of local capacity, existing facilities, and community vision/preferences, the following goals and objectives are adopted.

- Goal 4.4: Provide sidewalks and trails in support of the Comp. Plan vision of easy pedestrian access to all downtown amenities.
  - Policy 4.4.1: Provide pedestrian access from major neighborhoods to the downtown core.
  - Policy 4.4.2: Provide pedestrian access to major public facilities such as schools, churches, and libraries.
  - Policy 4.4.3: Provide pedestrian access to the rodeo grounds and new ball fields.
  - Policy 4.4.4: Develop trails that link downtown with planned open spaces, including wetland mitigation areas.
- Goal 4.5: Provide neighborhood parks consistent with the overall City vision of convenient pedestrian access.
  - Policy 4.5.1: Ensure that adequate land for neighborhood parks is acquired through developer dedication when processing major new subdivisions.

- Goal 4.6: When economically feasible, support the recreational needs of the Nooksack Valley community.
  - Policy 4.6.1: Continue to assess the need for additional community facilities to serve city residents and the surrounding area.
  - Policy 4.6.2: Allow access to City recreational programs and facilities by residents of the Nooksack Valley.
- Goal 4.7: When economically feasible, provide facilities and events targeted to the County and the region.
  - Policy 4.7.1: Continue to provide a facility for rodeo events.
  - Policy 4.7.2: Continue to provide a facility for baseball and softball events.
- Goal 4.8: Provide recreational facilities and opportunities to residents of all ages.
  - Policy 4.8.1: Continue to provide a senior center facility and program.
  - Policy 4.8.2: Continue to provide a historical museum facility.
  - Policy 4.8.3: Work with local groups and organizations to facilitate the restarting of the youth program to be located at the Sumas Community Center.
  - Policy 4.8.4: Maintain existing facilities such as the basketball and tennis courts that are used by people of all ages.

4.8.6 Project prioritization

Upon completion of the feasibility analysis, projects were placed into the following three groups corresponding to a conceptual development schedule.

Near term (1 – 2 years). These facilities/programs are popular yet require little capital investment. They are within the realm of possible development by the City acting alone.

- **Trails.** Rights-of-way and easements already available to the City provide the skeleton upon which a trail system could be developed. Relying upon those easements, a proposed trail/sidewalk system is included on Map 12. The proposed facilities are discussed in priority order, based upon existing needs and feasibility of construction.
  - *Sidewalk connecting Garfield Street subdivisions to downtown.* There will eventually be 65+ homes straddling Garfield, and the area already contains a substantial number of children. Residents of the area must now walk on the paved shoulder of Garfield Street to reach town. A sidewalk is needed along the south shoulder of Garfield, separated from the street by curbing or by a grass strip. $15,000
  - *Western lowland loop.* A loop can almost be completed through the western industrial area using the rights-of-way along Van Street, Johnson Street, Hesselgrave Way, and Barbo Road, together with the trail easement through the Sytsma wetland tract. A missing link exists along Sumas Creek, immediately east of the Sytsma tract. The City should approach Burlington-Northern to gain an easement and allow completion of the loop. The length of the loop would be about 13,000 feet, and cost for a crushed rock trail is estimated at $50,000.
  - *Western highland loop.* As development occurs along Moe Hill, the City should require developer installation of the proposed trail, which could make use of existing Barker

Avenue and Spring Street rights-of-way. Cost is estimated at $18,000.

- *Southern loop.* As development occurs south of Front Street, the City should require developer installation of a trail to connect the rodeo grounds to the Perry Street trail. This project should include connecting Sumas Avenue to the footbridge located adjacent to the new ball fields.

- **Recreation program.** A summer youth program could be attempted in the coming years, if sufficient interest and community support exist, using a design that minimizes capital expense – i.e., maximum use should be made of existing facilities such as the youth center and the tennis/basketball courts. The major expense would be associated with staff, but the fees charged to participants could be set so as to recover the bulk of the cost.
- **Promote use of rodeo ground.** A marketing effort should be launched to promote increased use of the rodeo ground for private events such as reunions, riding clubs, etc. Such an effort could be channeled through the Chamber of Commerce and could use media such as a web site, brochures, or direct email to targeted clubs/organizations.

Medium term (2 - 6 years). These facilities require significant planning and capital outlay, and the City does not have the financial resources to pursue them immediately. At the same time, the cost of these facilities is of a small enough magnitude that the City should be able to develop a funding mechanism.

- **Baseball fields.** Construction of the new ball fields was completed in 2007. This facility includes two baseball fields (four baseball diamonds) and one soccer field.
- **Playgrounds.** Neighborhood "tot lots" are needed in two areas. One should be developed in the Garfield Street subdivisions, and eventually, a second in the undeveloped area south of Front Street. At Garfield Street, development of a lot will involve purchase (or donation) of a land parcel, whereas near Front Street, the land should be acquired through dedication during the subdivision process. On top of land costs, the cost of playground equipment would be about $7,000 per site.

Long term (10+ years). An indoor swimming pool and recreation center are included in this category. These facilities require a major capital outlay and pose the greatest risk, in that there are competitive facilities within the target regional market. A recreation center is of lesser risk than a pool because of the possibility of conversion of the building to an alternate use, the lower capital and operating costs, and lesser need for staffing. Similar to the new Bellingham pool, it is assumed that a pool would be used for swimming teams, public swims, rentals, lessons, and youth programs. The two facilities would ideally be co-located in order to share facilities such as parking and changing rooms. Capital costs would be in the range of $2+ million.

4.8.7 Financial Plan

A sequence of desired projects is included in the table pertaining to General Government expenditures, in the overall *Six-Year Financial Analysis* that immediately follows this section. The following are funding sources available for development of park/recreation facilities:

- General fund revenue. Capital could be allocated annually to an improvement program from general fund revenues. Given the other demands on this fund, use of these funds will likely be quite limited.
- Capital facilities fund. This fund receives revenue from the Real-estate Excise Tax and has gradually built to a fund balance of about $586,000.
- Economic development revolving fund. This fund previously received revenue from the Electric Fund, but such funds are no longer available. Certain projects with a clear economic development linkage could be funded from the balance remaining in this fund.
- Limited purpose levy. The voters could be asked to approve a levy for the specific purpose of raising money for a facility. However, given that Sumas is currently at its statutory maximum levy, this option is not currently available.
- IAC/RCO grant. Upon acceptance of this Parks & Recreation Chapter by the state Interagency Committee on Outdoor Recreation (IAC), now the Recreation and Conservation Office (RCO), Sumas became eligible to apply for state grants for facilities such as ballfields and trails.
- ALEA grant (or similar). Projects such as the wetland trail loop will be eligible for grants from resource agency programs such as DNR's Aquatic Lands Enhancement Account (ALEA).

4.9 Police

4.9.1 Existing conditions

The Sumas Police Department provides police protective services within Sumas City limits. Coverage is provided 24 hours a day, seven days a week. During major emergency events, additional law enforcement support is provided by various state and local law enforcement agencies. The Police Department offices are located within Sumas City Hall, and the Department has a staff of five full-time officers in addition to the Chief of Police. The Police Department operates and maintains a fleet of six patrol cars in addition to office and other equipment related to law enforcement.

Level of Service. Based on a 2024 population of 1,835 people within the City, the Police Department currently provides the following levels of service:
- 3.3 officers per 1,000 population; and
- 3.3 patrol cars per 1,000 population.

The City proposes to maintain the following level of service standards:
3.0 officers per 1,000 population; and
3.0 patrol cars per 1,000 population.

4.9.2 Future conditions

Based on the 2045 population allocation of 2,835 people, the City would need 8.5 officers and 8.5 patrol cars to accommodate planned growth while maintaining the above level of service

standards. The current staffing level of six officers and six patrol cars is sufficient to serve projected growth through the year 2027; however, in approximately 2028, the City will need to add an additional officer and patrol car to maintain the above level of service standard. Seven officers and patrol cars will be enough to maintain the above level of service standard through the year 2034; after which, the City will need to increase to eight officers and patrol cars through the year 2041. Then, in order to maintain the above level of service standard through remainder of the planning period, the City will need to increase to nine officers and patrol cars.

The primary capital improvement expenditures anticipated by the Sumas Police Department are those associated with the purchase of new patrol cars. The City anticipates the need to replace one patrol car every year. In the past, the federal government has provided grants that covered up to a percentage of the cost of purchasing a new patrol car; however, more recently, these grants have not been able to cover such expenditures. The Department will continue to be housed within Sumas City Hall, so no major building expenses are announced. The City uses a radio system that is in coordination with the system used by the Whatcom County dispatch service, known as What-Comm. Any expenses that are required to maintain coordination with What-Comm's system must be at the expense of the City.

4.10 Fire protection

Fire protection services within the city of Sumas are provided by Whatcom County Fire Protection District 14. Such services are provided under the terms of a multi-year contract between District 14 and the city. District 14 is preparing a capital facilities plan that addresses growth within the District's service area, including Sumas, through 2045.

4.10.1 Existing conditions

Fire District 14 operates primarily on a volunteer basis. The District maintains three fire stations – one in Sumas, one in Kendall and one in Welcome – and a fleet of 25 vehicles, including fire engines, tenders, aid cars and other vehicles.

4.10.2 Future conditions

The District's capital facilities plan identifies a number of capital improvement projects that are needed over the course of the planning period. With the passage of the levy increase by the voters in 2023, the District is expected to have sufficient resources to complete the improvements needed to serve new growth through 2045.

4.11 Six-Year Financial Analysis

This section demonstrates whether the city has the resources to pay for the capital facilities anticipated during the next six years. No attempt is made to account for the on-site costs of expected development. Developers will bear those costs completely. We will instead focus on major system-wide projects, such as new wells, substations, etc.

Table 4-6, below, includes five spreadsheets corresponding to the five major funds (or groups of

funds) in the Sumas accounting system. Each spreadsheet shows projected revenue and expenditure over the six-year span from 2024 through 2029. The spreadsheets are based on the 2023 year-end results. The dozens of line items in the accounting system are consolidated into a few major categories. For instance, expenditures are generally allocated to just four categories: salaries and benefits, operations and maintenance, debt service, and capital outlay. The major capital projects discussed earlier in this chapter are listed individually.

One column contains percentage values used to predict future trends. For the most part, we simply assume that revenues and expenditure will increase proportionately to the expected growth rate of 2.0 percent. For some kinds of revenue and expenditure (e.g., scheduled debt), no growth in costs is shown. No adjustment for inflation is made, but no rate increases are shown either. We assume that rates can be increased in proportion to inflationary pressure.

At the bottom of each spreadsheet are two lines showing the annual operating results and the cumulative fund balance. Annual results are calculated by subtracting annual expenditure from actual annual revenue (i.e., ignoring the balance brought forward from a prior year).

Following is a discussion of each system-specific spreadsheet:

General Government. This spreadsheet represents costs associated with legislative, executive, judicial, legal, general governmental, police, health, fire, park, cemetery, and library cost centers. No major capital improvement projects are identified under this fund, except the planned replacement of patrol cars by the police department.

Absent some new sources of revenue, this fund shows a pattern of steep decline over the coming six years. General government, together with the transportation system, are the fund groups that have suffered most from the decline in tax revenue associated with the drop in Canadian passers-through (i.e., sales tax, gas tax).

Transportation System. This spreadsheet represents costs associated with the street fund. It is assumed that future major street projects will be funded through state and federal grants, a reasonable assumption given the City's eligibility for federal border and corridor funds and its participation in the binational IMTC planning process.

Ignoring major projects, the underlying fund shows a pattern of gradual increase over the coming six years. These increases are due in part to the city's ability to allocate any of the annual property tax revenue to this fund.

Water/Sewer System. This spreadsheet incorporates the combined water and sewer funds. There are a number of minor capital improvement projects planned for both systems, but no major projects have been planned for this fund. The City transfers a substantial amount from this combined fund to the General Government fund because of a 9-percent payment in lieu of utility tax. The water fund shows a gradual incline over the six-year period. This difference in trajectories can be explained by the relatively higher cost of capital improvement projects required for sewer systems. A potential solution would be for the City to pursue a modest sewer rate increase in 2026 to keep the fund healthy through 2029 and beyond.

Water/Sewer Hookups. This spreadsheet shows a gradual decline in revenue over the six-year period. This is mainly due to the large expenditure required for capital sewer projects.

Storm Sewer System. This spreadsheet shows a state of stagnation in the stormwater fund. The revenue generated from storm sewer user fees and interest roughly equal the projected cost of operations and maintenance.

Electric System. This fund is in a healthy state and shows a strong increase over the 6-year period. A major capital project that the City is preparing to use these funds for is a new 600-amp circuit proposed for the industrial district. More details on this project are provided in Chapter 7 Utilities Element.

Substantial cash is transferred from this fund to the General Government fund because of a 6-percent payment in lieu of utility tax.

Consolidated results. This spreadsheet simply adds together the results of those shown above. It shows that the city has the overall resources to fund the projects anticipated in the next six years, with a projected cumulative surplus of about $800,000

Table 4-10. Capital Facilities Financial Analysis

			2024	2025	2026	2027	2028	2029	6-Yr Total
Projected Population Growth Rate		2.0%							
General Government									
	001/103/104/105/107/301/302								
Revenue									
	Balance brought forward		3,567,212	3,514,199	3,440,535	3,328,889	3,179,033	2,990,732	
Acct #'s									
310's	**Taxes**								
311	Property tax	1.0%	712,013	719,134	726,325	733,588	740,924	748,333	
313	Sales tax	2.0%	594,874	606,772	618,907	631,285	643,911	656,789	
313	Transient Rental (Hotel/motel tax)	0.0%	5,183	5,183	5,183	5,183	5,183	5,183	
313/316	Utility taxes	2.0%	86,504	88,234	89,998	91,798	93,634	95,507	
316	In-lieu utility taxes		288,009	311,218	317,442	323,791	330,267	336,873	
318	REET	2.0%	65,138	66,440	67,769	69,125	70,507	71,917	
320's	**Licenses and Permits**								
321/322	Licenses, permits	2.0%	66,400	67,728	69,082	70,464	71,873	73,311	
330's	**Intergovernmental Revenues**								
335-336	State-shared & entitlements	0.0%	60,895	60,895	60,895	60,895	60,895	60,895	
340's	**Charges for services**								
341-347	Charges for services	2.0%	150,715	153,729	156,804	159,940	163,139	166,402	
350's	**Fines and Penalties**								
353-359	Fines, forfeits	2.0%	10,724	10,939	11,157	11,380	11,608	11,840	
360's	**Miscellaneous Revenues**								
361	Interest		39,230	39,230	39,230	39,230	39,230	39,230	
362-369	Miscellaneous	2.0%	3,078	3,139	3,202	3,266	3,331	3,398	
380's	**Other Increases in Fund Resources**								
	Principle Repayments	2.6%	14,215	14,585	14,964	15,353	15,752	16,162	
390's	**Other Financing Sources**								
395-398	Other Financing Sources	0.0%	162,381	162,381	162,381	162,381	162,381	162,381	
	Total revenue		**2,259,358**	**2,309,605**	**2,343,340**	**2,377,679**	**2,412,635**	**2,448,220**	
Expenditure			**2024**	**2025**	**2026**	**2027**	**2028**	**2029**	**6-Yr Total**
510's	**General Government**								
511-518	Salaries & Benefits	2.0%	185,167	188,871	192,648	196,501	200,431	204,440	
511-518	Operations & Maintenance	2.0%	272,836	278,292	283,858	289,535	295,326	301,233	

1

			2024	2025	2026	2027	2028	2029	6-Yr Total
520's	**Public Safety**								
521	PD Salaries & Benefits	2.0%	977,846	997,402	1,017,350	1,037,698	1,058,451	1,079,620	
521-525	Operations & Maintenance	2.0%	341,098	347,920	354,878	361,975	369,215	376,599	
522	Fire District #14 Contract	8.0%	264,000	294,000	324,000	354,000	384,000	414,000	
524	Building Salaries & Benefits	2.0%	40,086	40,887	41,705	42,539	43,390	44,258	
530's	**Utilities**								
536	Salaries & Benefits	2.0%	11,540	11,771	12,006	12,246	12,491	12,741	
536	Operations & Maintenance	2.0%	7,579	7,731	7,885	8,043	8,204	8,368	
550's	**Natural and economic Envornment**								
554-558	Operations & maintenance	2.0%	26,073	26,595	27,127	27,669	28,222	28,787	
560's	**Social Services**								
566	2% LP/Substance Abuse Treatment	2.0%	664	677	691	704	719	733	
570's	**Culture and Recreation**								
576	Salaries & Benefits	2.0%	32,054	32,695	33,349	34,016	34,696	35,390	
572-576	Operations & Maintenance	2.0%	64,921	66,219	67,544	68,894	70,272	71,678	
591-593	**Debt Service**								
591	SBITA	0.0%	3,470	3,470	3,470	3,470	3,470	3,470	
594-595	**Capital Expenditures**								
594	Capital Outlay	2.0%	85,038	86,739	88,474	90,243	92,048	93,889	
	Total expenditure		**2,312,371**	**2,383,269**	**2,454,985**	**2,527,535**	**2,600,937**	**2,675,206**	
Annual operating results			-53,013	-73,664	-111,645	-149,856	-188,301	-226,986	-803,466
Cumulative balance			3,514,199	3,440,535	3,328,889	3,179,033	2,990,732	2,763,746	

Inc. current expense, cemetery, CIP, civic, economic development, youth, criminal justice lo-pop funds

Street Fund - 101			2024	2025	2026	2027	2028	2029	6-Yr Total
	101								
Revenue									
	Balance brought forward		482,885	496,812	510,311	523,368	535,969	548,099	
310's	**Taxes**								
311	Property tax	1.0%	53,116	53,647	54,183	54,725	55,272	55,825	
313	Gas taxes	2.0%	33,848	34,525	35,216	35,920	36,639	37,371	
330's	**Intergovernmental Revenues**								
335-336	State-Shared & Entitlements	2.0%	34,358	35,045	35,746	36,461	37,190	37,934	

			2024	2025	2026	2027	2028	2029	6-Yr Total
340's	**Charges for services**								
344	Charges for services	2.0%	913	931	950	969	988	1,008	
360's	**Miscellaneous Revenues**								
361	Interest	0.0%	8,778	8,778	8,778	8,778	8,778	8,778	
	Total revenue		**131,013**	**132,927**	**134,873**	**136,853**	**138,868**	**140,917**	
Expenditure									
540's	**Transportation**								
542	Salaries/Benefits	2.0%	59,717	60,911	62,129	63,372	64,639	65,932	
542	Roads/ Street Maintenance	2.0%	35,089	35,790	36,506	37,236	37,981	38,741	
543	General Admin & Overhead	2.0%	21,897	22,335	22,782	23,237	23,702	24,176	
594-595	**Capital Expenditures**								
595	Misc Capital Outlay	2.0%	384	391	399	407	415	423	
	Total expenditure		**117,086**	**119,428**	**121,816**	**124,253**	**126,738**	**129,272**	
Annual operating results			13,927	13,499	13,057	12,601	12,130	11,644	76,858
Cumulative balance			496,812	510,311	523,368	535,969	548,099	559,743	

Water/Sewer - 401			2024	2025	2026	2027	2028	2029	6-Yr Total
	Balance brought forward		**319,127**	**333,951**	**308,491**	**255,662**	**171,190**	**50,192**	
Water System									
Revenue									
Acct #'s									
340's	**Charges for services**								
343	Water Sales	2.0%	655,363	668,470	681,840	695,476	709,386	723,574	
346	Lab Fees	0.0%	3,508	3,508	3,508	3,508	3,508	3,508	
360's	**Miscellaneous Revenues**								
361	Interest	0.0%	8,137	8,137	8,137	8,137	8,137	8,137	
	Total Revenue		**667,008**	**680,115**	**693,484**	**707,121**	**721,031**	**735,218**	
Water System									
Expenditure									
530's	**Utilities**								

			2024	2025	2026	2027	2028	2029	6-Yr Total
534	Salaries & Benefits	2.0%	316,974	323,313	329,779	336,375	343,102	349,964	
534	Operations & Maintenance	2.0%	233,621	238,294	243,060	247,921	252,879	257,937	
535	Tax Commission	2.0%	21,471	21,900	22,338	22,785	23,241	23,705	
535	In-Lieu transfer to 001 (CE)		58,147	60,162	61,366	62,593	63,845	65,122	
591-593	**Debt Service**								
591	SBITA	0.0%	680	680	680	680	680	680	
594-595	**Capital Expenditures**								
594	Capital Outlay - FEMA Projects	2.0%	21,018	21,438	21,867	22,304	22,750	23,205	
	Total expenditure		**651,910**	**665,787**	**679,090**	**692,658**	**706,497**	**720,614**	
	Water culmative balance		15,097	14,327	14,395	14,463	14,533	14,605	87,421
Sewer System 401									
Revenue									
Acct #'s									
340's	**Charges for services**								
343	Sewer Sales	2.0%	963,421	982,690	1,002,344	1,022,390	1,042,838	1,063,695	
346	Lab Fees	0.0%	1,349	1,349	1,349	1,349	1,349	1,349	
	Total revenue		**964,770**	**984,039**	**1,003,693**	**1,023,739**	**1,044,187**	**1,065,044**	
Sewer System									
Expenditure									
530's	**Utilities**								
535	Salaries & Benefits	2.0%	279,276	284,861	290,558	296,370	302,297	308,343	
535	Operations & Maintenance	2.0%	285,953	291,672	297,506	303,456	309,525	315,716	
535	Tax Commission	2.0%	30,339	30,946	31,564	32,196	32,840	33,496	
535	In-Lieu transfer to 001 (CE)		70,885	88,442	90,211	92,015	93,855	95,733	
535	Contracted Sewer - City of Abbotsford	####	194,638	221,887	252,952	288,365	328,736	374,759	
591-593	**Debt Service**								
591	SBITA	0.0%	680	680	680	680	680	680	
594-595	**Capital Expenditures**								
594	Capital Outlay - FEMA Projects	2.0%	103,273	105,338	107,445	109,594	111,786	114,021	
	Total expenditure		**965,043**	**1,023,827**	**1,070,916**	**1,122,675**	**1,179,719**	**1,242,748**	
	Sewer culmative balance		-273	-39,788	-67,224	-98,936	-135,531	-177,704	-519,455

			2024	2025	2026	2027	2028	2029	6-Yr Total
Annual operating results			14,824	-25,460	-52,829	-84,472	-120,998	-163,099	-432,035
Cumulative balance			333,951	308,491	255,662	171,190	50,192	-112,907	

Water-Sewer Hookups - 403			**2024**	**2025**	**2026**	**2027**	**2028**	**2029**	**6-Yr Total**
	Balance brought forward		417,347	366,167	313,694	259,900	204,760	148,247	
Acct #'s									
330's	**Intergovernmental Revenues**								
335-336	State-shared & entitlements								
340's	**Charges for services**								
343	Water Hookups	2.0%	5,800	5,916	6,034	6,155	6,278	6,404	
343	Sewer Hookups	2.0%	9,705	9,899	10,097	10,299	10,505	10,715	
360's	**Miscellaneous Revenues**								
361	Interest	0.0%	13,531	13,531	13,531	13,531	13,531	13,531	
	Total Revenue		**29,036**	**29,346**	**29,663**	**29,985**	**30,314**	**30,650**	
Expenditure									
530's	**Utilities**								
534	Water Operations	2.0%	172	175	179	182	186	190	
535	Sewer Operations	2.0%	172	175	179	182	186	190	
594-595	**Capital Expenditures**								
594	Water - Capital Outlay	2.0%	4,668	4,762	4,857	4,954	5,053	5,154	
594	Sewer - Capital Outlay	2.0%	75,204	76,708	78,242	79,807	81,403	83,031	
	Total expenditure		**80,216**	**81,820**	**83,456**	**85,125**	**86,828**	**88,564**	
Annual operating results			-51,179	-52,473	-53,794	-55,140	-56,513	-57,914	-327,014
Cumulative balance			366,167	313,694	259,900	204,760	148,247	90,333	

Storm Sewer - 410	**2024**	**2025**	**2026**	**2027**	**2028**	**2029**	**6-Yr Total**
Revenue							

			2024	2025	2026	2027	2028	2029	6-Yr Total
	Balance brought forward		407,457	407,677	407,818	407,878	407,854	407,747	
Acct #'s									
340's	**Charges for services**								
343	Storm Sewer User Fees	2.0%	34,256	34,941	35,640	36,352	37,080	37,821	
360's	**Miscellaneous Revenues**								
361	Interest	0.0%	4,204	4,204	4,204	4,204	4,204	4,204	
	Total revenue		**38,459**	**39,144**	**39,843**	**40,556**	**41,283**	**42,025**	
Expenditure									
530's	**Utilities**								
531	Storm - Operations & Maintenance	2.0%	38,239	39,004	39,784	40,579	41,391	42,219	
	Total expenditure		**38,239**	**39,004**	**39,784**	**40,579**	**41,391**	**42,219**	
Annual operating results			221	141	60	-23	-108	-194	96
Cumulative balance			407,677	407,818	407,878	407,854	407,747	407,553	

Electric Utility - 411			2024	2025	2026	2027	2028	2029	6-Yr Total
	balance brought forward		1,203,107	1,570,865	1,944,125	2,323,454	2,708,972	3,100,805	
Acct #'s									
340's	**Charges for services**								
343	Electric Sales	2.0%	2,657,087	2,710,229	2,764,433	2,819,722	2,876,116	2,933,639	
343	Hookups	2.0%	14,016	14,297	14,583	14,874	15,172	15,475	
343	Good/Services	0.0%	51,902	51,902	51,902	51,902	51,902	51,902	
345	BPA Conservation	2.0%	1,037	1,058	1,079	1,100	1,122	1,145	
360's	**Miscellaneous Revenues**								
361	Interest	0.0%	18,654	18,654	18,654	18,654	18,654	18,654	
	Total Revenue		**2,742,697**	**2,796,139**	**2,850,651**	**2,906,253**	**2,962,967**	**3,020,815**	
Expenditure									
530's	**Utilities**								
533	Salaries & Benefits	2.0%	535,364	546,071	556,992	568,132	579,495	591,085	
533	Operations & Maintenance	2.0%	221,153	225,576	230,088	234,689	239,383	244,171	
533	Purchased Power - BPA	2.0%	1,355,123	1,382,225	1,409,870	1,438,067	1,466,829	1,496,165	
533	Renewable Energy Incentive (DeBont - Solar)	0.0%	55	55	55	55	55	55	

			2024	2025	2026	2027	2028	2029	6-Yr Total
533	Tax Commission	2.0%	102,659	104,712	106,806	108,943	111,121	113,344	
533	In Lieu - transferred to 001 (CE)		158,977	162,614	165,866	169,183	172,567	176,018	
550's	**Natural and economic Envornment**								
554	BPA Conservation	2.0%	800	816	832	849	866	883	
591-593	**Debt Service**								
591	SBITA	0.0%	680	680	680	680	680	680	
594-595	**Capital Expenditures**								
594	Capital Outlay	2.0%	128	130	133	136	138	141	
	Total expenditure		**2,374,938**	**2,422,879**	**2,471,322**	**2,520,734**	**2,571,134**	**2,622,542**	
Annual operating results			367,758	373,260	379,329	385,519	391,833	398,273	2,295,972
Cumulative balance			1,570,865	1,944,125	2,323,454	2,708,972	3,100,805	3,499,078	

Consolidated Results	2024	2025	2026	2027	2028	2029	6-Yr Total
Balance brought forward	6,397,135	6,689,672	6,924,974	7,099,152	7,207,780	7,245,822	
Annual operating results	292,538	235,302	174,178	108,628	38,042	-38,277	810,410
Cumulative balance	6,689,672	6,924,974	7,099,152	7,207,780	7,245,822	7,207,545	

7

5 Housing Element

This chapter is a required element of a comprehensive plan developed to meet the provisions of the GMA. In overview, this chapter describes existing characteristics of housing, provides a statement of goals and policies related to housing, projects future housing needs, and demonstrates the availability of sufficient land for housing.

5.1 Planning Assumptions

This chapter has been developed in accordance with county-wide planning policies that have been integrated with other plan elements to ensure consistency throughout the plan. In particular, two assumptions developed in the land-use element are used as the basis for projections in this chapter:

- The population of the city will increase substantially during the planning period, from 1,810 in 2023 to 2,810 in the year 2045.
- The number of persons per household is roughly 2.7 and is expected to remain constant during the planning period.

5.2 Existing Conditions

Information about existing housing conditions was gathered from several sources: the 2020 US Census, the 2020 American Community Survey, the city's 2020 census of housing and population, the city's building permit records, and the Whatcom County Housing Authority data.

5.2.1 2023 ACS Census data

Amount and type of housing. According to the 2023 American Community Survey (ACS) put on by the U.S. Census Bureau, the city of Sumas had 579 housing units[2] within city limits, of which 400 were detached single-family residences, 35 were mobile homes, RVs, or trailers, and 144 were multi-family residences. Comparing the 2010 U.S. Census data to the 2023 ACS, there was an increase of 96 detached single-family residences, an increase of 46 multi-family residences, and a decrease of 28 mobile homes, RVs, or trailers. Based on the 2023 ACS, the growth in Sumas during the 2010s appears to have been an even mix of single- and multi-family residences.

Age of housing stock. Table 5-1 describes the age of the housing stock based on U.S Census data. In general, the housing stock reflects the same kind of trends as revealed in the population data discussed in Chapter 2. There is a substantial amount of very old housing (pre-1939) and of very

[2] A housing unit is a structure or a portion of a structure in which a single family or a single individual lives. A single apartment or a single family house is considered 1 unit, while a duplex is considered 2 units.

new housing (post-1990), and a period of relatively little housing construction during the mid- to late part of the last century.

Table 5-1. Age of Housing Stock

Year Built	Number of Units	Fraction of Total
2010 or later	117	20.2%
2000-2009	87	15.0%
1980-1999	99	17.1%
1960-1979	144	24.9%
1940-1959	27	4.7%
1939 or earlier	105	18.1%
Total	579	100.0%

Source: 2023 U.S. Census, American Community Survey

Condition of housing stock. The 2023 ACS provides certain measures of interior conditions considered to be substandard. No housing unit was identified as lacking complete plumbing facilities. Also, no unit was identified as lacking complete kitchen facilities.

Ownership and occupancy. The Census data show that out of 534 occupied units, 366 (69 percent) were owner-occupied, and 168 (31 percent) were renter-occupied. 280 (77 percent) of the owner-occupied homes were mortgaged and 86 (23 percent) were owned free and clear.

Value of housing stock. Table 5-2 profiles the value of specified homes in Sumas. The median value of Sumas' owner-occupied homes was $232,200. The equivalent statistic for Whatcom County as a whole was $375,600.

Table 5-2. Value of Specified Owner-Occupied Housing Units

Value $	Number of Units	Fraction of Total
< 50,000	1	0.3%
50,000 - 99,999	4	1.1%
100,000 - 299,999	147	40.2%
300,000 - 499,999	166	45.4%
> 500,000	48	13.1%
Total	366	100.0%

Source: 2023 U.S. Census, American Community Survey

Table 5-3. Percentage of Income Toward Rent and Housing Costs

% of Income Toward Rent or Housing	Owners	Renters	Total	Fraction of Total
< 20%	190	24	214	40.8%
20 - 29%	94	14	108	20.6%
> 30%	82	101	183	34.9%
Not computed	0	19	19	3.6%
Total	366	158	524	100.0%

Source: 2023 U.S. Census, American Community Survey

Affordability of housing. HUD defines housing as "affordable" when a household pays less than 30 percent of its total income toward housing costs. Households paying less than 20 percent are considered to live in "very affordable" housing. Table 5-3 summarizes the affordability of both owner- and renter-occupied units within the city of Sumas. The table is derived from sample data and therefore has some built-in inaccuracies, but the table nevertheless allows identification of trends. The row marked by the arrow shows the part of the community living in unaffordable housing.

As seen in the left columns, 22 percent of *owners* live in unaffordable housing (i.e., 82 out of 366). It is impossible to know whether those owners have assumed large mortgages as a matter of choice or have encountered hard times and are struggling to keep their homes. As shown in the next column, the situation of the *renters* is worse: 64 percent of renters live in unaffordable housing (i.e., 101 out of 158). Overall, 35 percent of the community lives in unaffordable housing, which is slightly higher than the 33 percent identified in the 2010 Census.

Table 5-4 shows the economic situation of households in Sumas according to classifications established by HUD. The left column shows HUD's definitions of income brackets. Note that each bracket is defined with respect to the *median household income* within the community. That value was $86,500 in Sumas, so a "very low" income household would be one with an income less than 50 percent of that amount, or less than $43,250, as shown in the second column. The right column reveals an interesting profile: there are large high- and low-income segments of the community, and a smaller middle ground. In addition, there has been a slight increase in Very Low, Low, and Moderate income since the 2010 Census, which showed that 44 percent of households in those categories, as compared to 46 percent in the year 2023.

Table 5-4. Households By Income Group

HUD Definition of Income Brackets		Corresponding $ in Sumas	# Households	Fraction of Total
Very Low	< 50% of median	< $43,250	137	25.7%
Low	50 - 80% median	$43,250 - $69,200	77	14.4%
Moderate	80 - 95% of median	$69,200 - $82,175	33	6.2%
Middle/High	> 95% of median	> $82,175	286	53.7%
Total			533	100.0%

Source: 2023 U.S. Census, American Community Survey

5.2.2 Building permits

Census data from 2020 fails to reflect activities of the last four years (April 2020 - March 2024). In this period there were permits issued for 37 new residential structures, providing a total of 41 new housing units. Four single-family residences and one mobile home were removed. 35 single-family residences were constructed with a median construction value of approximately $238,100, which after adding the average lot price of $94,000 yields an amount somewhat lower than the overall median of $362,000 reported in the 2023 Census. Two building permits were for multi-family structures (one duplex and one fourplex). The recent permits show a diversion from the pattern mentioned earlier in which the majority of new housing units (i.e., 85 percent, 35 out of 41 units) are single-family.

5.2.3 Subsidized housing

Several subsidized housing projects have been undertaken in Sumas, as discussed below.

- *Creekside Meadows.* Two multi-family structures, including 20 units, are located south of Front Street. Creekside Meadows was funded by the state as a Tax Credit Project. Rent and utilities are no more than 30 percent of a household's adjusted income. Eligibility is based on income. Two- and three-bedroom units are available.
- *Sumas Square*. Sumas Square is an 11-unit structure managed by the Whatcom County Housing Authority for elderly and handicapped people. Rent, including utilities, equals 30 percent of monthly income, after medical expenses have been deducted. Eligibility is based on age, disability, and income. Since the November 2021 flood event, Sumas Square has been closed and its residents relocated while the Whatcom County Housing Authority works to receive funding from the State to elevate and rehabilitate the structure.
- *Sunrise Apartments.* This 12-unit structure was built several years ago under WCHA's sponsorship but is now privately owned. Rents are established based upon monthly income.
- *Rehabilitation project.* In the early 1980s, about 25 homes were rehabilitated using federal grant funds.
- *Habitat for Humanity.* Over the past decade, Habitat for Humanity has constructed six residential dwelling units (three pairs of attached, zero lot line homes) that are now owner-

occupied. In 2024, Habitat for Humanity received a Conditional Use Permit for construction of a three-unit attached, zero lot line development on Front Street.

5.2.4 Summary

Considering all of the data presented above, a number of conclusions can be reached:

- Census data reveals a little less than half of Sumas residents are Very Low, Low, and Moderate income, according to HUD standards. The proportion of people within those categories declined during the 2010s, with 46 percent of residents now falling into those categories.
- Housing within Sumas is generally at the low-cost end of the spectrum of what is available within the county. Existing homes have lower median value, and new construction is marketed at a cost that is lower than median home values elsewhere in the county.
- Since 2010, the majority of housing built in Sumas was single-family.
- Census data indicates that 183 households (36 percent of the total) are situated in unaffordable housing and that over half of those households are in rental units. There are 41 units of subsidized rental housing available in town, so more such units could be used.

5.3 Projected Housing Needs

Amount of housing. New housing stock will be needed to accommodate anticipated growth. Table 5-5 identifies the projected housing demand for Sumas over the course of the 20-year planning period. The table implements the new State policy of providing for the apportionment of more low- and very low-income housing over the course of the planning period. The table shows that Sumas will accommodate about 381 new households, of which 213 will consist of Low- or Very Low-income people.

Availability of sufficisent land. As described in Chapter 3, expanded UGAs provide enough land to accommodate 372 new housing units, including a market factor of about 18 percent.

Provision for diverse needs. As noted in the summary above, the marketplace has done a good job of adjusting to the needs of the diverse economic segments found in Sumas. Availability of suitable land will ensure continued responsiveness in the marketplace, and the land-use plan identifies such land. The regions identified for infill development (see Map 6A in the land-use chapter) are adjacent to varied kinds of existing housing. The region to the northeast abuts a higher-income single-family neighborhood and can be expected to attract more development of a similar nature. The region to the northwest (Moe Hill) is also attracting larger single-family homes. The region to the south (Boon Street) encircles an attractive subsidized apartment complex, and other multi-family development has recently located there. That area will probably continue to attract a mix of single-family and multi-family housing, and the description of the area emphasizes its suitability for a mix of single-family and multi-family development.

Table 5-5. Projected Housing Demand

	2023	2030	2035	2040	2045
Population	1,810	2,129	2,356	2,584	2,810
Persons Per Unit	3.13	3.13	3.13	3.13	3.13
Occupancy Rate	92%	92%	92%	92%	92%
Income Bracket	Number of Units Need in Bracket				
Very Low	101	136	170	207	248
Low	113	125	132	137	140
Moderate	74	86	93	101	107
Middle/High	744	278	298	315	330
Total Housing Units	532	626	837	760	826

5.4 Goals and Policies

Goal 5.1: Support healthy residential neighborhoods that reflect a high degree of pride in ownership.

Policy 5.1.1: The city shall enforce the ordinances that affect the appearance of neighborhoods, such as the ordinances pertaining to abandoned cars and to noxious weeds.

Policy 5.1.2: The city shall adhere to the residential zoning code and refrain from granting variances that might change the character of neighborhoods.

Goal 5.2: Strive to preserve and enhance the existing housing stock.

Policy 5.2.1: The city should serve as lead agency for residents interested in seeking federal grant funds targeted at rehabilitation of housing, if available.

Goal 5.3: Encourage the development of affordable housing for all income brackets.

Policy 5.3.1: The city will supply enough residential land to meet the projected housing need over the next 20 years.

Policy 5.3.2: The city should support the development of some neighborhoods containing only single-family residences.

Policy 5.3.3: The city will allow for the development of multi-family housing to meet affordable housing needs, provided that the character of the community is maintained.

Policy 5.3.4: The city shall regulate the construction and siting of manufactured housing in the same manner as site-built housing and shall not discriminate against the siting of manufactured housing within residential zoning districts.

6 Transportation Element

This Chapter is Not Complete.

Pursuant to the Growth Management Act, the transportation element of each comprehensive plan must include the following elements:

1. Inventory of all transportation facilities and services (land, air and water including transit alignments);
2. Land-use assumptions used in estimating travel forecasts;
3. Identification of system expansion needs and transportation system management needs to meet current and future demands;
4. Level of service standards for all arterial and transit routes;
5. Specific actions and requirements for bringing into compliance any facilities or services that are below the established level of service;
6. Traffic forecasts (based on an adopted land-use plan) to provide information on the location, timing, and capacity needs of the future;
7. Finance, including a multi-year financing plan and identification of additional funding sources if there is a funding shortfall;
8. Intergovernmental coordination; and
9. Demand management strategies.

This chapter will first establish Sumas' transportation-related goals and policies. It next will demonstrate how the transportation element meets the requirements listed above. Finally, it will contain sections describing Existing Conditions and Future Conditions.

6.1 Goals and Policies

In consideration of the needs and issues identified within this chapter, the City of Sumas adopts the following goals and policies:

Goal 6.1: Provide transportation systems that provide convenient, safe, and accessible access to employment, educational and recreational opportunities for citizens and visitors, and that provide for the movement of goods and services.

Policy 6.1.1: The city should control access to arterials and connectors in order to minimize disruption of traffic.

Policy 6.1.2: The city should require new subdivisions to front on connectors and arterials rather than state routes.

Policy 6.1.3: The city should establish and maintain connectivity between new subdivisions, benefiting pedestrians, automobiles, utilities, and emergency services.

Policy 6.1.4: The city should keep industrial / commercial truck traffic off residential and local streets.

Policy 6.1.5: Within the city's financial ability to do so, the city should bring poor roads up to standard.

Policy 6.1.6: The city should consider Intelligent Transportation Systems, when cost effective, to increase the capacity and safety of the transportation system.

Policy 6.1.7: The city should continue to implement and require measures that accomplish the goals and policies of the Americans with Disabilities Act of 1990.

Goal 6.2: Coordinate transportation planning and construction with neighboring jurisdictions and with the state.

Policy 6.2.1: The city adopts LOS "D" (V/C ratio of 0.8 during p.m. peak hours) for non-HSS state routes within city limits.

Policy 6.2.2: The city adopts LOS "D" for city-designated principal arterial streets.

Policy 6.2.3: The city should participate in the regional planning processes coordinated by Whatcom Council of Governments (WCOG), including the IMTC process.

Policy 6.2.4: The city should coordinate with the Washington State Department of Transportation (WSDOT) with regard to state routes.

Policy 6.2.5: The city should coordinate with Whatcom County with regard to county arterials and collectors.

Policy 6.2.6: The city should coordinate with WTA with regard to transit.

Policy 6.2.7: The city should coordinate closely with Whatcom County during annexations and work toward solutions providing long-term benefit to citizens of both the city and the region.

Policy 6.2.8: The city should incorporate Intelligent Transportation Systems initiatives and projects into the Whatcom Regional ITS Architecture.

Goal 6.3: Build and operate facilities as efficiently as possible.

Policy 6.3.1: The city should maintain and preserve the existing transportation system.

Policy 6.3.2: The city should pursue low-cost funds such as grants and subsidized loans.

Policy 6.3.3: The city should undertake effective planning and build only what has been planned.

Policy 6.3.4: The city should coordinate road projects with utility projects.

Policy 6.3.5: The city should adopt road design standards that are sensible and that do not needlessly increase cost.

Goal 6.4: Allocate costs fairly among those that benefit.

Policy 6.4.1: The city should use SEPA to mitigate off-site impacts associated with new development and redevelopment.

Policy 6.4.2: The city should use "no-protest" agreements, when appropriate, as a means of allowing approval of individual small-scale projects, while still providing for eventual construction of necessary improvements through formation of LIDs.

Policy 6.4.3: Facilities providing benefit to both newcomers and existing residents should be paid for by both groups, with each group paying a share proportional to their corresponding benefit.

Policy 6.4.4: The city should require all developments to provide transportation facilities meeting adopted levels of service and other standards to be provided concurrent with completion of such developments; otherwise, the city should not issue permits and approvals for such developments until concurrency requirements have been met.

Goal 6.5: Encourage system efficiency, energy conservation and minimize impacts to the environment.

Policy 6.5.1: The city should support development of park-and-ride facilities when feasible.

Policy 6.5.2: The city should control stormwater run-off in order to reduce impacts to ground and surface waters.

Policy 6.5.3: The city should consider use of Intelligent Transportation Systems (ITS) that will reduce the need for construction, decrease emissions through reduced delays and idling times, and enhance the transportation network in a way that minimizes noise and environmental impacts, and preserves open space.

Policy 6.5.4: The city should research opportunities for requiring commercial truck traffic coming from or going to the international border crossing to travel through the industrial district to reduce congestion on Cherry Street. Utilization of ITS should be considered.

6.2 GMA Requirements

This chapter meets GMA requirements as shown below:

6.2.1 Inventory of Transportation Facilities

The Existing Conditions report in this chapter includes an inventory and assessment of transportation facilities in the City of Sumas.

6.2.2 Land Use Assumptions

The Land Use element of this comprehensive plan (Ch. 3) gives a detailed description of the land use assumptions for the twenty-year planning period. Map 8 in the Land Use element shows the expected pattern of development on which this transportation plan is based.

6.2.3 Identification of Needs

Citizen input is a key to identifying the needs of the community. A public workshop, survey and results of a 1992 survey were used to identify transportation needs of the Sumas community. These needs were reviewed and, where necessary, updated by the city planning commission and city council through the 2025 public review and public hearing process.

6.2.3.1 1992 Community Survey

The Planning Commission distributed 400 surveys to the community asking about likes, dislikes, issues, needs and how to fund future actions. The survey was not a transportation survey, and transportation issues were only minimally addressed. The results of a question on "the most critical issues or problems facing Sumas" were ranked in numerical order. Transportation issues followed items such as defining land use classifications, promoting business growth, protecting environmental quality, containing and directing growth, protecting private property rights, defining the edge between rural and urban and providing affordable housing. Improving transportation services and facilities ranked ninth. Many comments were directed toward the perceived problems caused by the border crossing.

6.2.3.2 2024 Community Survey

City staff distributed over 600 surveys to the community, asking for their likes and dislikes about this community, as well as how the community should look to improve over the course of the twenty-year planning period. The City received about 120 responses, which is about 8% of the population of Sumas. This survey was also not a transportation survey, and transportation issues were only minimally addressed. The results of a question on “what aspects of Sumas could use improving” were counted by appearance of a specific response category. Transportation-related issues were assigned the response category of infrastructure. The infrastructure category appeared 21 times, which correlates to about 22% of the responses to that question. Most of those responses were directed toward improving the conditions of roads and sidewalks throughout town.

The results of a question on "what should be Sumas’ top priority” were also counted by appearance of a specific response category. Again, the transportation-related issues were assigned to the response category of infrastructure. For this question, the infrastructure category appeared 10 times, which correlates to about 10% of the responses to that question. Most of those responses were directed toward improving the conditions of the community’s sidewalks, including a specific location on Hovel Road, which would create better pedestrian connectivity between the Hovel Estates housing development and the rest of town.

6.2.3.3 Public Transportation Workshop

A public transportation workshop was held in Sumas on September 9, 1993. An opinion survey was distributed, focused on identifying transportation issues and needs in the community. Eighteen people attended the workshop.

6.2.3.4 Public Opinion Survey

In 1992, twelve opinion surveys were completed and returned. The survey asked respondents to identify how much they agree or disagree with statements about problems, needed improvements and methods of paying for changes. For each statement, the respondent rated their level of agreement or disagreement on a one to five scale, with 1 being "disagree," 5 being "agree," and 3 being "neutral."

In the problem identification section, the statements "tourist traffic is the main reason why we have traffic problems" and "making left turns across traffic is difficult" were generally agreed with (4.83 and 4.82 out of 5, respectively). Other high scores (all above 4.50) were: "traffic has gotten worse in the last five years" and "senior citizens need alternate types of transportation."

In the section identifying needs, all statements were ranked above 3.7, indicating general agreement with all of the statements. The highest scores are for: sidewalks along routes used by school children (4.90), public bus service (4.30), sidewalks in residential areas (4.20), and intersection safety improvements (4.18).

Regarding the section titled "How to Pay for Changes," there was little agreement as to how to pay for improvements. An exception was obtaining state and federal funds, which ranked 4.9.

Many individual comments identified the problems with the border traffic or the need for public transit to connect with Lynden.

Road Issues Identification

The second part of the survey asked respondents to mark on a city map the locations of dangerous intersections, areas of traffic, where sidewalks and bicycle paths should be located, and where the street was in bad shape. Most respondents concentrated on identifying unsafe intersections (results reported below). Many did not use the secondary code to identify the extent of the problem.

Respondents identified the following intersections as unsafe: Front/Cherry (9 responses), Garfield/Cherry (8), Second/Cherry (7), Third/Cherry (6), and First/Cherry (4). Other intersections mentioned include: Harrison/Cherry, Cleveland/Cherry, Vancouver/Cherry, Mitchell/Cherry, Morton/Cherry and Hovel/Front.

Other responses indicated the need for bicycle lanes on Halverstick, Front and Rock; the presence of excessive traffic on Front and Cherry; and the need for sidewalks on Gough Street.

Identified Issues and Needs

Summarized below are the issues and needs identified by the Sumas community and confirmed by the city planning commission and city council:

Issues

1. Canadian border traffic.
2. Dangerous intersections on Cherry Street, especially at Garfield Street and Front Street.
3. Difficulty making left turn movements on major streets.

Needs

1. For actions to reduce the level of border traffic.
2. To investigate public transit to connect Sumas with Lynden.
3. Sidewalks in residential areas, especially where school age children travel.
4. Intersection improvements.

6.2.4 Multimodal Level of Service Standards

The Growth Management Act requires that the transportation chapter of the county and city comprehensive plans set regionally coordinated level of service (LOS) standards on all principal arterial and transit routes. The definition of level of service is left to the discretion of the local jurisdiction. HB1487 clarifies that WSDOT is responsible for establishment of LOS on Highways of Statewide Significance (HSS). The portions of SR9 within Sumas are HSS.

Level of service is a road-use standard used to judge how well a road operates. Typically, LOS is based on the amount of time delay experienced by a motorist at a traffic signal or along a road segment. For roadways, LOS A means that the roadway is free-flowing and is free from congestion. LOS F means that the route is so heavily congested that traffic no longer flows in a steady stream—the number of cars exceeds the road's capacity. Although levels of service are normally defined qualitatively, a standard set of engineering calculations assigns LOS rankings to roads, intersections, or other facilities. Comparing traffic volume with the capacity of a given route segment defines existing levels of service. That same comparison, using projected future traffic volume, yields insight on future levels of service.

Volume to Capacity Ratio

Sumas levels of service will be defined in terms of the peak hour volume-to-capacity ratio (V/C ratio). The V/C ratio is calculated by dividing existing or projected volume of a particular road segment by its capacity in trips per day or per peak hour. If the result ranges from zero (0) to one (1), the section is operating within capacity. As the result nears one (1) and exceeds it, the section will begin to operate less efficiently and safely. Increasing volume-to-capacity ratios imply that as growth occurs, road improvements may have to be made to maintain levels of service.

Table 6-1 Relationship between Level of Service and V/C Ratios		
Level of Service	V/C Ratio Range	Typical Flow Conditions
A	0.0 to 0.5	Free flow; individual users virtually unaffected by presence of others in traffic stream
B	0.5 to 0.7	Within range of stable flow, but presence of others in traffic stream begins to affect individual behavior and freedom to maneuver within traffic stream
C	0.7 to 0.8	Within range of stable flow; individual users significant affected by presence of others
D	0.8 to 0.9	High density, but stable flow; speed and freedom to maneuver are severely restricted; ability to maneuver within traffic stream becomes difficult
E	0.9 to 1.0	Operating conditions are at or near capacity level; all speeds reduced to low, uniform value; freedom to maneuver within traffic stream extremely difficult
F	Greater than 1.0	Forced or breakdown flow; amount of traffic approaching a point exceeds the amount that can transverse point and queue forms; operations within queue characterized by extremely unstable stop-and-go waves

While a relationship between V/C ratio and level of service is not strictly defined, the relationship shown in Table 6-1 is typically regarded as a standard and is considered as such in defining the level of service classifications for the City of Sumas.

Sumas Level of Service

The busiest roads in Sumas are SR 9 (Cherry Street) and SR 547 (Rock Road). Recent regional transportation system modeling completed by the WCOG showed that SR 9 and SR 547currently operate at LOS A. All other road segments within Sumas included in the WCOG model were also found to be operating at LOS A. We therefore conclude that all of Sumas' transportation network is now operating at LOS A. The severe congestion sometimes seen on Cherry Street is not so much a function of roadway LOS as of border-station LOS.

WSDOT has adopted, as an element of its State Highway System Plan, LOS C for state highways in rural areas and LOS D for state highways in urban areas, including SR9 and SR547 in Sumas. For HSS segments within Sumas, WSDOT's LOS value is binding. Whatcom County is proposing LOS D for county roads within county UGAs, and levels of service matching the affected cities' LOS in city UGAs. As seen in the policies above, Sumas has adopted LOS D for city-designated principal arterial streets, and LOS D for non-HSS state routes within city limits. WSDOT, Whatcom County, and Sumas therefore have consistent LOS policies within Sumas and its UGA.

Multimodal Level of Service Regulations

As part of HB 1181 (2023), the Washington State Legislature requires all jurisdictions to identify specific level of service standards for all modes of transportation, not just single-occupancy

vehicles (SOVs). To this end, the City has identified three new development regulations to be implemented that would satisfy these multimodal level of service standards:

a) The LOS standard for all state highways shall include 12-foot-wide travel lanes, sidewalks on both sides, bike lanes on both sides and accommodations for appropriately placed transit stops, where applicable.
b) The LOS standard for all arterials and major collectors shall include two 11-ffoot travel lanes, sidewalks on both sides, bike lanes on one or both sides, and accommodation for transit stops along established transit routes.
c) The LOS standard for minor collectors and local access roadways shall include two 10-foot-wide travel lanes, sidewalks on both sides, and parking on both sides of the roadway within residential areas.

6.2.5 Action Needed to Correct Existing Deficiencies

There are no facilities in the City of Sumas that are currently operating below the established LOS standard.

6.2.6 Traffic Forecasts

The Future Conditions section below contains forecasts of traffic volumes. Based on the results of regional transportation modeling completed in 2025 by WCOG consistent with land use assumptions developed in conjunction with the county's 2025 comprehensive plan update, all roadway segments within Sumas that are part of the regional transportation system are anticipated to continue to operate at LOS A through 2045.

6.2.7 Finance

6.2.7.1 Multi-Year Financing Plan

The City of Sumas annually adopts a Six Year Transportation Improvement Program (TIP) as required by the State of Washington. The adoption of the Six Year Program qualifies the city to receive federal and state grants, including grants made available by the state Transportation Improvement Board (TIB). The city's Six Year Transportation Program, shown below, displays all major roadway improvements scheduled during the first six years of the planning period. In some cases project completion is dependent on the availability of state and federal funding that has not yet been secured.

6.2.7.2 Funding Sources

The TIP reveals a reliance upon three sources of funds. First is revenue from the local option gas tax. Second is FHWA funds that are anticipated to be procured through the federal Surface Transportation Program, which is coordinated through the WCOG. Third is state TIB funds, which include grants made available on an annual basis based on the results of a competitive application process.

Table 6-2: 6-Year Transportation Improvement Program: 2026-2031

EXHIBIT "A" CITY OF SUMAS 6-YEAR TRANSPORTATION IMPROVEMENT PROGRAM 2026-2031

Cost Estimates

#	Project Name	Description/Termini	Length (miles)	2026	2027	2028	2029	2030	2031	Estimated Total Cost	Local Acquired Funds	Federal Acquired Funds
1	Various Sidewalks	Repair various sidewalks through the city		$ 60,000	$ 60,000	$ 60,000	$ 60,000	$ 60,000	$ 60,000	**$ 360,000**	$ 360,000	
2	Various Crack Seal Projects	Crack-sealing various streets		$ 125,000	$ 125,000	$ 125,000	$ 125,000	$ 125,000	$ 125,000	**$ 750,000**	$ 750,000	
3	Various 2" Alley Overlays	Various 2" Alley Overlays		$ 80,000	$ 80,000	$ 80,000	$ 80,000	$ 80,000	$ 80,000	**$ 480,000**	$ 480,000	
4	Sumas Ave Rebuild - Engineering	Engineering for removal of street and repaving Sumas Avenue, from Front St to South of Bridge	0.26		$ 588,406					**$ 588,406**	$ 79,435	$ 508,971
5	Sumas Ave Rebuild - Right of Way	Resolving issues of right of way for removal of street and repaving Sumas Avenue, from Front St to South of Bridge	0.26			$ 40,000				**$ 40,000**	$ 5,400	$ 34,600
6	Sumas Ave Rebuild - Construction	Remove existing and replace with new, Sumas Ave, from Front St to South of Bridge	0.26				$ 4,595,945			**$ 4,595,945**	$ 3,764,516	$ 831,429
7	Hovel Rd Sidewalk	Build sidewalk along the west side of Hovel Rd, from Front St to the Hovel Rd Bridge	0.1			$ 85,000				**$ 85,000**	$ 85,000	
8	Hovel Rd Bridge Construction	Remove culvert and construct bridge, Hovel Rd over Bone Creek	0		$ 1,850,000					**$ 1,850,000**		$ 1,850,000
9	Gough St Rebuild - Engineering	Engineering for removal of street and repaving, intersection of Gough St and Garfield St	0		$ 62,000					**$ 62,000**		$ 62,000

The City has secured non-local funding for two of the above projects: the design, right of way acquisition, and construction phases of the Sumas Avenue reconstruction project, as well as for the Hovel Road Bridge Construction Project. Both of these projects are federally funded. The Hovel Road Bridge Construction Project is being funded by FEMA as part of the rebuilding effort following the November 2021 flood event.

6.2.8 Intergovernmental Coordination

Sumas' policies supporting intergovernmental coordination are included in the Goals and Policies section above. This Transportation Element has been developed consistent with the Regional Transportation Plan developed by the Whatcom Council of Governments (WCOG), serving as the Regional Transportation Planning Organization (RTPO).

6.2.9 Demand Management Strategies

Sumas' policies supporting demand management strategies, including development of non-motorized transportation and park-and-ride facilities, are included in the Goals and Policies section above. The city currently utilizes signage on northbound SR 9 to direct truck traffic off of Cherry Street and through the industrial district when congestion occurs on the state highway approaching the international border crossing. At present, this signage is activated manually by the Sumas police department based on observed levels of congestion. The city also supports ongoing efforts to implement demand management strategies coordinated through the Whatcom Council of Governments, including the Whatcom Smart Trips program.

6.2.10 ADA Compliance

As a municipality, the City of Sumas is committed to enforcing the policies and requirements of the Americans with Disabilities Act (ADA), passed by Congress and signed by President George H.W. Bush in 1990. The ADA seeks to protect the rights of and improve accessibility for Americans with disabilities through the use of infrastructure and construction regulations. While the City of Sumas is dedicated to following the regulations of the ADA, existing construction and infrastructure does not always include those required improvements. To resolve this, as infrastructure gets updated and buildings get renovated, the City requires the implementation of ADA-compliant measures. Over the course of this planning period, major improvements should be made to the City's infrastructure to make it more accessible for generations to come.

6.3 Existing Conditions

6.3.1 Basic Transportation System

State Route 9 (Cherry Street), State Route 547 (Front Street), and the Burlington Northern Railroad form the regionally significant elements of the city's transportation system. SR9 is part of the Federal Highway System and is a designated Highway of Statewide Significance. SR 9 provides access to the international border crossing with Canada. The operations of the international border crossing facilities by U.S. and Canadian Customs cause the single most significant impact affecting the general performance of the city's transportation system. Other

significant roads that are part of the regional system providing access within and to Sumas include Bob Mitchell Way, Garrison Road, Garfield Street, Sumas Avenue, , Halverstick Road, and Hovel Road. See Figure 6-1.

6.3.2 Roadway Classifications

There is a direct relationship between roadway functional classification and roadway design standards. Federal, State, and local agencies adopt roadway design standards to carry vehicular traffic volume at specific speeds. The American Association of State Highway Traffic Officials (AASHTO) has adopted standards that are the benchmarks for most road design standards. The city has adopted, by ordinance, AASHTO standards for new roads as part of the city's subdivision development standards. These standards are not applicable to existing city roads.

R.C.W. 35.78.10 and R.C.W. 47.26.180 require local jurisdictions to adopt a street classification system consistent with state and federal requirements. R.C.W. 35.78.010 identifies the classification system and definitions by which cities are to classify the street system. R.C.W. 47.26.180 has a provision that allows cities outside Census designated urban areas to develop one category of arterial streets. SMC 9.08.010 sets the arterial roadway classifications within the city. Cherry Street and Front Street are classified by the city as arterial streets.

6.3.3 Access Control Classification

R.C.W. 47.50.010 required that all state routes be designated by WSDOT with an access control classification. Highway access classifications identify the number of, and the distance between entrances on a particular roadway segment. Because turning movements disturb the traffic flow, roads with fewer access points may accommodate higher speeds. In 1993, WSDOT established highway access classifications for all state routes. In Sumas, there are two state routes established; SR 9 (Cherry St) major access to town from the south and flows through Sumas to the border crossing at the northern boundary. SR 9 from the southern limits to the intersection with SR 547 is classified as a Class 2 highway, while the stretch of SR 9 north of the intersection with SR 547 is classified as a Class 3 highway. The second state route, SR 547 (Front St), is a major collector that provides the main access to town from the west towards the Columbia Valley UGA. This highway is classified as a Class 5 highway. Class 5 highways typically post speed limits of around 25 miles per hour within city limits. SR 547 (Front St) has a speed limit of 30 miles per hour within Sumas City Limits and 20 mph during certain times in the school zone.

6.3.4 Traffic Volumes

Traffic volumes represent the number of vehicles that pass a point on a road during a specified time. Because volumes vary hourly, daily and seasonally, roads are normally designed to meet the highest volume (peak). Congestion occurs when the traffic volume equals and exceeds the road's capacity. As the population of a region grows, traffic increases proportionally causing congestion on roadways.

Table 6-3 presents recent traffic count data for the major roads within the city that are included in the regional transportation system. For each road segment, traffic counts are provided for total average daily trips (ADT) and for the peak hour. Traffic counts are provided for both travel

directions. Where data were not available from WSDOT, traffic count data were supplemented with data results from the WCOG regional transportation model, which has been calibrated to closely match existing traffic count data.

Table 6-3: Traffic Counts on Streets in the Regional System, 2023

	ADT	ADT	Peak Hour	Peak Hour
Street Segment	**N or E**	**S or W**	**N or E**	**S or W**
SR 9 north of Front Street	2,312	2,219	171	132
SR 9 south of Front Street	2,938	3,053	231	191
SR 547 east of SR 9	1,243	1,408	111	77
Bob Mitchell Way	269	326	21	17
Garfield Street west of SR 9	577	653	44	41
Sumas Avenue north of Front Street	548	574	37	42
Hovel Road	415*	367*	32	39

Source: WSDOT traffic counts compiled by WCOG and supplemented with results from the WCOG regional transportation model.
* Hovel Road ADT based on 2023 WCOG traffic counts.

The road with the heaviest traffic volume is generally SR 9 (Cherry Street) to the Canadian border. This is due to the concentration of retail and commercial activities along Cherry Street and the proximity to the Canadian border. As shown in the table, most traffic in the city is on the street system north of Front Street. The local streets with the heaviest traffic volumes are Sumas Ave and the east-west streets north of Johnson Creek that connect Railroad Street, Cherry Street and Sumas Ave

The lack of a sufficient auto queuing area at the border results in large queues that form down the length of Cherry Street, and that at times extend south of Front Street. Adding to the queue delays are the numerous turns resulting from the curb cuts for local business along both sides of Cherry Street from Front Street to the Canadian border.

The above traffic estimates were analyzed in relation to volume to capacity ratios (V.C) and the adopted level of service (LOS) standards discussed earlier in this chapter. The results of this analysis are shown in Table 6-4.

Table 6-4: Traffic Congestion on Streets in the Regional System, 2023

	V/C	V/C	LOS	LOS
Street Segment	**N or E**	**S or W**	**N or E**	**S or W**
SR 9 north of Front Street	0.23	0.18	A	A
SR 9 south of Front Street	0.27	0.23	A	A
SR 547 east of SR 9	0.12	0.09	A	A
Bob Mitchell Way	0.03	0.04	A	A
Garfield Street west of SR 9	0.05	0.05	A	A
Sumas Avenue north of Front Street	0.05	0.05	A	A
Hovel Road	0.52*	0.46*	B	A

Source: WCOG.
* Hovel Road level of service ratings based on 2023 WCOG traffic counts.

Based on this analysis, all of the above roadways that are included in the regional transportation system are operating at LOS A. Figure 6-2 presents the results of the WCOG model in terms of both volume and LOS.

6.3.5 Pavement Conditions

Most Sumas arterials are in good or fair condition, as shown on Figure 6-3. This information was collected during a "windshield" survey and does not reflect an engineering analysis of pavement conditions. The range of pavement conditions used was: Very Good; Good; Fair; and Poor. Very-Good pavements are new with no cracks, deflections, or utility cut repair patches. Good pavements are somewhat older in age with a relatively few number of cracks, utility cut repair patches, or deflections. Pavements rated in Fair condition had some cracks, utility cut repair patches, pavement may be raveling, and street edges may be beginning to break up. Poor street pavements had a large number of cracks, or utility cut repair patches. Poor pavements also had a large amount of the surface breaking up from the edges to centerline. Areas with streets needing repair based on poor pavement conditions include:

- Residential neighborhood north of Garfield Street.
- Residential and Industrial neighborhood on West Second St and West Third St.
- Residential neighborhoods in the southeast corner of town, including Victoria Street and Swartwood Road.
- The entire length of Kneuman Road.

6.3.6 Accidents and Safety

Table 6-5 presents the total number of accidents (collisions) recorded in the Sumas Police Department's database for the years 2021-2024. As can be seen, the number of collisions varied somewhat through this four-year period. The largest numbers of reportable collisions were considered "reportable, non-injury." Table 6-6 presents the total numbers of accidents during the four-year period that were reported on the busiest streets in the city. By far the largest number of collisions occurred on Cherry Street (SR 9) and Front Street (SR 547).

Table 6-5: Collision History by Year, 2021-2024

	Reportable		Non-Reportable		
Year	Injury	Non-Injury	Non-Injury	Other	Total
2021	0	1	1	0	2
2022	2	2	2	2	8
2023	0	2	0	1	3
2024	1	3	3	1	8

Source: Sumas Police Department

Table 6-6: Collision History by Street, 2021-2024

Year	Reportable		Non-Reportable		Total
	Injury	Non-Injury	Non-Injury	Other	
2021	0	1	1	0	2
2022	2	2	2	2	8
2023	0	2	0	1	3
2024	1	3	3	1	8

Source: Sumas Police Department

6.3.7 U.S. Canadian Border Crossing

The international border crossing at Sumas is the single most important source of traffic in Sumas, and also the primary source of traffic congestion. The border crossing in Sumas is one of two 24-hour commercial and passenger vehicle crossings located in Whatcom County. The crossing is located approximately 25 miles from Interstate 5 and one mile from the Trans-Canada Highway. Total automobile crossings in Sumas are approximately 17 percent of the combined number of crossings at the two ports of entry in Blaine and about 13 percent greater than the number of crossings at Lynden-Aldergrove. Automobile crossings at Sumas account for approximately 13 percent of the total crossings at the four ports of entry from Blaine to Sumas. For those traveling to and from Bellingham, one route is through Sumas along SR 9, connecting then with SR 546 (Badger Road), SR 544 (Pole Road), or SR 542 (Mt. Baker Highway).

Total vehicle crossings in 2024 were down by approximately 26 percent since the last comprehensive plan update in 2016. The Coronavirus Pandemic in 2020 caused all land border crossings across the country to be closed to all but essential workers. This closure lasted for almost two years. The effects continue to be felt today as vehicle crossings have never completely reverted back to pre-2020 conditions. In 2019, total southbound personal vehicle crossings equaled roughly 2.4 million. In 2024, total southbound personal vehicle crossings equaled roughly 1.1 million. This is a decrease of roughly 54 percent.

The General Services Administration (GSA) is currently in the design stage of a project directed to expand the U.S. side of the Sumas border crossing. In particular, the GSA looks to substantially expand the southbound commercial inspection area, as well as expand the northbound commercial inspection area. The total area of the current Sumas border crossing facility is roughly 4 acres. The proposed expansion would increase the land area to about 12 acres. The GSA is currently considering alternatives for closures between the Sumas and Lynden crossings to attempt to limit the amount of disturbance on travel times that the project will take. All scenarios include a partial closing of the northbound personal vehicle lanes and a full closing of the northbound commercial vehicle lanes at some point during the construction timeline.

6.3.8 Overland Freight

Transportation of goods by trucks often affects the transportation system. Trucks accelerate more slowly, are less maneuverable and have longer stopping distances. Vehicle weight also affects local road conditions by decreasing the durability of the road surface.

According to data compiled by the WCOG, truck crossings at the Sumas International border crossing represent approximately 24 percent of heavy vehicle traffic crossing the border in mainland Whatcom County. Most traffic enters the county from the Peace Arch and Pacific Highway crossings in Blaine. In Sumas, Cherry Street (SR 9) serves as the commercial vehicle route for through-vehicles meeting U.S. weight restrictions, to and from the international border.

For 2024, the U.S. Department of Labor, Bureau of Labor Statistics estimated that goods valued at roughly $4.5 billion dollars passed through the Sumas-Abbotsford border crossing, with the largest commodity components including manufacturing and wood products.

As part of the development of the Sumas Cargo Terminal facility, the Port of Bellingham received a grant from the U.S. Economic Development Administration to construct a truck overload road from the International Port of entry to the Cargo facility. Due to the lower U.S. weight standards, the U.S. road system cannot support the Canadian trucks. The construction of Bob Mitchell Way was necessary because of these weight standard differences. Bob Mitchell Way was constructed to allow commercial vehicles that meet Canadian weight restrictions entry to the U.S. and access to the Sumas Cargo Terminal. In the terminal, cargoes are trans-shipped to rail or other vehicles that meet U.S. weight restrictions. The heavy-load haul road was extended an additional 1,700 feet in 1997 and is now present as a frontage road parallel to W. Front Street that services the west end of the Sumas industrial zone.

6.3.9 Rail Systems

The Burlington Northern – Santa Fe (BNSF) Railroad operates a north-south rail line that runs west of Cherry Street. The line connects Sumas to Sedro-Woolley and continues southwest to Burlington where it connects to the primary north-south rail corridor. The route has moderate freight volumes between three and five million gross ton-miles per mile and will continue to be an active part of the Burlington Northern freight operations. A spur line also runs west to the City of Lynden. Freight trains use this spur approximately once a week.

As of March 1995, passenger rail service in Whatcom County was reinstated. West Coast Amtrak provides twice-daily service along the coast from Seattle to Vancouver, B.C., with stops in Everett, Mt. Vernon, and Bellingham. During the border closure caused by the Coronavirus Pandemic, this passenger rail services was cancelled. The service has since reopened.

The U.S. Congress formally designated the Portland, Oregon to Vancouver, British Columbia rail corridor as a high-speed passenger rail corridor. The designation has provided the impetus for the Washington State Legislature to enact Chapter 231, Laws of 1991 (SHB 1452), directing that a comprehensive feasibility assessment be conducted for developing a high-speed ground

transportation system in Washington State. A preliminary long range high-speed rail plan was completed by the High-Speed Ground Transportation Steering Committee in October 1992. The high-speed rail service would operate at speeds in excess of 150 miles per hour, as compared to the existing 80 miles per hour speeds.

One preliminary proposal for the location of the system identifies the use of the same SR 9 corridor used by the present Burlington Northern Railroad. A proposed station at Nugents Corner (15 miles south of Sumas) would provide residents with access to the system. The system would provide access to Vancouver, B.C., Skagit County, Seattle, Sea-Tac Airport, Olympia, Vancouver, WA and Portland, Oregon. Construction of the high-speed rail system may also provide city residents with supplemental benefits, such as connecting bus or shuttle service. The actual location of the route and station may change as the planning process continues. Two major obstacles to completion of the high-speed rail are financing and negotiation of rights-of-way.

In 2021, the Premier of British Columbia and the Governors of Washington and Oregon signed a Memorandum of Understanding (MOU) confirming their continued support for the project. In 2022, the Washington State Legislature directed and provided funding for WSDOT to continue exploring the project as an approach to addressing regional growth and mobility challenges. In a project report from June 2023, WSDOT indicated that they have received roughly $198 million in federal funding towards project planning, as well as an additional $50 million in matching funds from the Washington State Legislature. The report also indicates that the project team will soon begin work on developing and analyzing project scenarios to better understand the logistics of the project.

During the 2021 Nooksack River flood event, the main rail line running north-south through Sumas was washed out due to a build-up of flood waters on one side. Several rail cars fell off the tracks as a result and significant damage occurred to the tracks themselves. All told, BNSF was forced to pay roughly $4.5 million to repair all the damage.

6.3.10 Air Transportation

The nearest air facility is the municipal airport of the City of Abbotsford, B.C. The Abbotsford airport is a surplus military facility taken over by Abbotsford in 1996. As population grows in the Fraser Valley, and as the Vancouver airport becomes busier, the Abbotsford airport will become increasingly important. Flights are now available to inland Canadian cities (Regina, Calgary) and to resort destinations in the U.S. (e.g., Reno). In Whatcom County, the nearest airport is Lynden Municipal Airport, primarily used by private aircraft and charters. Bellingham International Airport, operated by the Port of Bellingham, provides commercial air carrier and charter services.

6.3.11 Scenic and Recreational Highways Program

The 1991 Transportation Budget (ESHB 1231) directed a review of all state routes for inclusion in the Scenic and Recreation Highway System. The goal of the program was to identify those highways that have significant natural, cultural or recreational characteristics and to work with local governments to protect the resources from undesirable or inappropriate development. Front

Street (SR547) was included in 1969 and the entire length of SR 9 was included as part of a 1991 system expansion study. Although no mandatory regulations exist, the city should consider development actions consistent with the intent of the legislation.

6.3.12 Commute Patterns

The 2020 American Community Survey provides a variety of information on the commute patterns and behavior of the employed Sumas residents aged sixteen years or older as shown in Tables 6-7, 6-8 and 6-9. Table 6-7 shows that of the 601 employed city residents, 81 percent drove alone, 10 percent carpooled, 1 percent walked, 4 percent commuted by some other means (bicycle, taxi or public transit), and 4 percent worked at home.

Table 6-7: Means of Transportation Used to Work

Means	Number	Percentage
Drove Alone	484	80.5%
Carpooled	62	10.3%
Walked	6	1.0%
Other	24	4.0%
Worked at Home	25	4.2%
Total	601	100.0%

Source: 2020 U.S. Census, American Community Survey.

Table 6-8 shows that 25 percent of the workforce begin their commute before 6:00 a.m. About 45 percent of the commuters left home between 6:00 a.m. and 8:00 a.m.

Table 6-8: Time Leaving Home to Go to Work

Time	Number	Percentage
12:00 a.m. to 4:59 a.m.	61	10.6%
5:00 a.m. to 5:29 a.m.	58	10.1%
5:30 a.m. to 5:59 a.m.	25	4.3%
6:00 a.m. to 6:29 a.m.	49	8.5%
6:30 a.m. to 6:59 a.m.	43	7.5%
7:00 a.m. to 7:29 a.m.	112	19.4%
7:30 a.m. to 7:59 a.m.	57	9.9%
8:00 a.m. to 8:29 a.m.	20	3.5%
8:30 a.m. to 8:59 a.m.	21	3.6%
9:00 a.m. to 11:59 a.m.	130	22.6%
Total	576	100.0%

Source: 2020 U.S. Census, American Community Survey

Table 6-9 shows that approximately 37 percent of the employed residents worked within twenty minutes from their place of residence. Approximately 9 percent spent more than one hour commuting to work. Approximately 38 percent of the employed work force commute between 20 and 44 minutes.

Table 6-9: Travel Time to Work

Commute Time	Number	Percentage	Cumulative Percentage
Less than 10 minutes	157	27.3%	27.3%
10 to 14 minutes	16	2.8%	30.1%
15 to 19 minutes	38	6.6%	36.7%
20 to 24 minutes	65	11.3%	48.0%
25 to 29 minutes	45	7.8%	55.8%
30 to 34 minutes	44	7.6%	63.4%
35 to 44 minutes	62	10.8%	74.2%
45 to 59 minutes	99	17.2%	91.4%
60 or more minutes	50	8.6%	100.0%
Total	576	100.0%	100.0%

Source: 2020 U.S. Census, American Community Survey

6.3.13 Public Transit

The WTA provides fixed route public transit service to the City of Sumas. This service includes four buses per day from Bellingham to Sumas and five buses per day from Sumas to Bellingham. WTA also offers flex-service in Sumas and the surrounding area where riders who are unable to travel to a bus stop on the fixed route can arrange for a regularly scheduled bus to make a stop at a location within the defined "flex" service area.

6.3.14 Private Taxi Service

There are no taxi services based in Sumas. However, several taxi companies provide county-wide service, which would include service to Sumas and the surrounding community.

6.3.15 Bicycle Facilities

Bicycles serve many purposes in a community. They provide a source of low-cost transportation and mobility to youths and residents who do not drive. In addition, many residents use bicycling for recreation. There are no designated bicycle facilities in the city. The local street system with the low-speed limits and volumes has served as the bicycle network.

The proposed Bay-to-Baker Trail would connect Sumas with Bellingham to the southwest and Mt. Baker to the east. The trail proposes using abandoned rail right-of-way for most of its 74-mile project. The segment of the Trail near Sumas would run along the abandoned C.M.S.T.P.&P. Rail line at the south of town. The Bay-to-Baker Committee does not have title to

this facility. The city will continue to be active in reviewing plans for routing within the city limits.

6.3.16 Pedestrian Facilities

Access sidewalks provide a convenient and safe route for pedestrians to use that is separate from the roadways. Sidewalks are most important in the areas of high traffic and higher residential densities. A complete sidewalk network in high-density areas would provide an alternative mode route for transportation.

Figure 6-4 shows that sidewalks are mainly found in commercial areas of the city. The City is gradually building a network of sidewalks throughout the older residential core area.

6.4 Future Conditions

Future roadway conditions will be influenced by both *regional* and *local* factors, each of which is analyzed briefly below.

6.4.1 Regional factors

- Cross-border truck traffic. A majority of the cross-border traffic seen in Sumas is commercial traffic, as shipping companies utilize the Sumas crossing's close proximity to access on the Trans-Canada Highway to ship goods eastward. Because of this, a strong industry has been based around catering to commercial truck traffic. Recently, work has begun to design an expansion project to the Sumas Land Port of Entry (LPOE) to better accommodate the amount of cross-border truck traffic that passes through the crossing. In particular, the south-bound commercial

  Currently, any commercial vehicle which must undergo secondary inspection prior to crossing southbound at the Sumas LPOE has to continue off the LPOE property and pull over on Railroad Street while the secondary inspection is performed. This process is largely not secure and runs the risk of allowing commercial vehicle drivers to skip the secondary inspection and continue on illegally.

- Growth in lower mainland. The Fraser Valley region of the lower mainland British Columbia is experiencing rapid growth at this time, and the trend is expected to continue over the planning period. The increasingly large population in the Abbotsford area will lead to increasing use of the Sumas crossing point over time. Improvements to queuing areas both northbound and southbound have been made in recent years that have helped reduce congestion, but congestion remains a significant problem.
- Cross-county corridor. The 1996 GSA border business plan put forward the notion of an east-west connection from Sumas to I-5. The connection would acknowledge the population growth referred to above and would also facilitate shifting of traffic from one crossing point to another, depending upon queue lengths experienced at a given time. The Gateway Pacific shipping terminal project contemplates a similar east-west connection in order to facilitate

movement of cargo from Cherry Point into the continental interior via the Trans-Canada Highway alignment. The City of Sumas supports the cross-county corridor concept and also supports an alignment that has an eastern terminus at Sumas.

6.4.2 Local factors

- Local growth. As described in the Land-use and Housing elements, a total of 372 new housing units are anticipated in Sumas in the coming 20 years. The impact of Sumas' residential growth will primarily affect roadways at the south and west ends of town. The effect of Sumas' commercial and industrial growth will impact the state highways and the heavy haul roads in the industrial area.

The predicted effect of these regional and local factors is revealed by the results of modeling that has been performed by WCOG. Table 6-6 presents the model results in relation to the major roadway segments within Sumas that are part of the regional transportation system. Model results are presented in terms of both average daily trips (ADT) and peak hour trips. The results presented in Table 6-10 can be compared to those included in Table 6-3 to see the increases in volume anticipated over the course of the planning period on the major roadways in Sumas.

Table 6-10: Traffic Model Results for Streets in the Regional System, 2045

	ADT	ADT	Peak Hour	Peak Hour
Street Segment	**N or E**	**S or W**	**N or E**	**S or W**
SR 9 north of Front Street	3,613	3,309	303	240
SR 9 south of Front Street	4,514	4,503	387	316
SR 547 east of SR 9	2,166	2,387	204	141
Bob Mitchell Way	508	555	45	40
Garfield Street west of SR 9	1,160	1,319	98	109
Sumas Avenue north of Front Street	686	683	46	47
Hovel Road	412*	375*	57	33

Source: WCOG regional transportation model.
* Hovel Road ADT based on 2025 WCOG Traffic Counts.

Regional factors will likely be the dominant factors affecting traffic growth near Sumas. As stated previously in this chapter, LOS D has been adopted for all roadways within the Sumas UGA. Table 6-11 presents the future traffic volumes in terms of V'C and LOS to analyze future congestion on roadways within the regional system.

Table 6-11: Traffic Congestion for Streets in the Regional System, 2045

	V/C	V/C	LOS	LOS
Street Segment	**N or E**	**S or W**	**N or E**	**S or W**
SR 9 north of Front Street	0.39	0.32	A	A
SR 9 south of Front Street	0.45	0.37	A	A
SR 547 east of SR 9	0.22	0.15	A	A
Bob Mitchell Way	0.05	0.05	A	A

Garfield Street west of SR 9	0.12	0.13	A	A
Sumas Avenue north of Front Street	0.06	0.06	A	A
Hovel Road	0.52*	0.47*	B	A

Source: WCOG regional transportation model.
* Hovel Road Level of Service ratings based on 2025 WCOG Traffic Counts.

Based on analysis of the projected traffic volumes presented in Table 6-6, all roadways within the Sumas UGA will continue to meet the adopted level of service standard through the year 2036. The 2045 results of the WCOG model are also shown on Figure 6-5 in terms of volume and LOS.

6.5 Complete Streets

The city has developed a "Complete Streets" policy that specifies design and operational features to be included in public rights-of-way to enable safer access for all users, regardless of age, ability or mode of transportation. The city recognizes that our "Mainstreet" (SR 9) is a state highway; therefore, the city will work with WSDOT to facilitate modal opportunities that help achieve the city's vision for a more connected and walkable downtown. Our goal is to improve safety, accessibility and aesthetic appeal of the city so we increase mobility, draw visitors, promote business growth and add value to our community's character and identity.

6.5.1 Vision

The vision of the City of Sumas is to incorporate a public right-of-way system which supports bicycle, pedestrian, and public transportation travel systems. This system focuses on means to promote healthy living, increasing the safety and well-being of all travelers, mitigating negative environmental impacts, supports the goal of high density development, and meets the needs of a growing, diverse border city. This system will support a diverse community in which all residents and visitors, regardless of their age, ability, or financial resources, can safely and efficiently use the public right-of-way to meet their transportation needs regardless of their preferred mode of travel.

6.5.2 Policy

The city will plan for, design, construct, operate, and maintain an appropriate and integrated transportation system that will meet the needs of motorists, pedestrians, bicyclists, wheelchair users, transit vehicles and riders, freight haulers, emergency responders, and residents of all ages and abilities.

Transportation facilities that support the concept of Complete Streets include, but are not limited to pavement markings and signs; street and sidewalk lighting; sidewalk and pedestrian safety improvements; Americans with Disabilities Act and Title VI compliance; transit accommodations; bicycle accommodations including appropriate signage and markings, and as appropriate streetscapes that appeal to and promote pedestrian use.

The system's design will be consistent with and supportive of local neighborhoods, recognizing that transportation needs vary and must be balanced in a flexible, safe, and cost-effective manner.

6.5.3 Projects

Those involved in the planning and design of projects within the public right-of-way will give consideration to all users and modes of travel from the start of planning and design work. Transportation improvements shall be viewed as opportunities to create safer, more accessible streets for all users. This shall apply to new construction, reconstruction, and rehabilitation.

6.5.4 Exceptions

Exceptions to this policy may be determined by the Public Works Director, City Manager, or City Council under the circumstances listed below:

A. Street Projects may exclude those elements of this policy that would require the accommodation of street uses prohibited by law;
B. Ordinary maintenance activities such as mowing, snowplowing, sweeping, spot repair, joint or crack sealing or pothole filling do not require that elements of this policy be applied beyond the scope of that maintenance activity;
C. Ordinary maintenance paving projects should include evaluating the condition of existing facilities supporting alternate transportation modes as well as modifying existing pavement markings and signage that supports such alternative modes as appropriate.
D. Street reconstruction projects and maintenance paving projects which involve widening pavement may exclude elements of this policy when the accommodation of a specific use is expected to:
    - Require more space than is physically available, or
    - Be located where both current and future demand is proven absent, or
    - Drastically increase project costs and equivalent alternatives exist within close proximity, or
    - Have adverse impacts on environmental resources such as streams, wetlands floodplains, or on historic structures or sites above and beyond the impacts of currently existing infrastructure.
    - The cost would be disproportionate to the current need or probable future use.
E. Street projects may exclude the development of sidewalks in areas falling outside those identified as appropriate for sidewalk on the basis of an adopted sidewalk policy or plan.

6.5.5 Intergovernmental Cooperation

The city will cooperate with other transportation agencies including the Washington State Department of Transportation, Whatcom Council of Governments and Whatcom County to ensure the principles and practices of Complete Streets are embedded within their planning, design, construction, and maintenance activities. The city will specifically cooperate to ensure

the transportation network flows seamlessly between jurisdictions in accordance with local and regional road, transit, bicycle, and pedestrian plans.

6.5.6 Design Criteria

The city, through the Public Works and Planning Departments, shall develop and maintain design criteria, standards and guidelines based upon recognized best practices in street design, construction, and operation as identified in Sumas Municipal Code, Title 11. To the greatest extent possible, the city shall adopt the same standards with particular emphasis on pedestrian and bicycle markings and wayfinding signage (as permitted through the Sumas Municipal Code). Resources to be referenced in developing these standards shall include, but not necessarily be limited to, the latest editions of: American Association of State Highway Transportation Officials (AASHTO) Policy on Geometric Design of Highways and Streets, Washington State Department of Transportation Design Manual, and the Manual on Uniform Traffic Control Devices (MUTCD).

6.5.7 Community Context

Implementation of the city's Complete Streets policy shall take into account the goal of enhancing the context and character of the surrounding built and natural environments.

6.5.8 Network

Appropriate attention should be given to projects which enhance the overall transportation system and its connectivity for access to parks or recreation areas, schools, shopping/commercial areas, public transportation, employment centers, existing pedestrian or bicycle networks, or regional bicycle pedestrian plans prepared by other associated groups or governments, such as Whatcom County.

6.5.9 Performance Measures

The Public Works Director and/or designees shall report to the Planning Commission and City Council on an annual basis on the transportation projects undertaken within the prior year and planned within the coming six year period and the extent to which each of these projects has met the objectives of this policy.

6.5.10 Implementation

This policy will be primarily implemented through developing bike and pedestrian network plans on a regional basis within the city and in conjunction with Whatcom County's regional plans. These plans shall specify the type and location of improvements and shall be implemented as funding becomes available. Special emphasis shall be placed on those elements of these plans that can be accomplished with little or no additional expense, such as providing bike lanes where existing pavement is adequate or where road shoulders are sufficient to allow for safe bicycle use.

7 Utilities Element

This chapter is a required element of a comprehensive plan developed to meet the provisions of the GMA. In overview, this chapter presents the general location and capacity of all existing and proposed utilities for the city of Sumas and the surrounding UGA.

The GMA defines electricity, natural gas, and telecommunications as "utilities," and this chapter contains a discussion of each, as well as a discussion of cable television. Water, sanitary sewer, and storm sewer systems are defined as "public facilities" and are addressed in the Capital Facilities Element (Chapter 4). Sumas is unusual in that it owns and operates its own electric utility. The discussion of this utility is therefore more extensive than that of the privately owned utilities. The financial analysis contained in Chapter 4 includes a detailed discussion of the city electrical utility's financial condition. The final section of the chapter presents goals and policies pertaining to private utilities.

7.1 Natural Gas

7.1.1 Existing conditions

Natural gas is provided by the Cascade Natural Gas Corporation (Cascade). Cascade serves its Whatcom county customers from a Northwest Pipeline Corporation transmission line that originates in Canada, crosses into the U.S. just east of Sumas, and runs south to the Columbia River. A second major line, the ARCO lateral, runs west from the Northwest Pipeline Corporation line across the county to the ARCO refinery, passing just to the south of town.

East of the city, a two-inch service pipeline branches off the Northwest Pipeline Corporation line and runs along Jones Road into Sumas. To the south, another two-inch branch line originating from the ARCO lateral enters the city on Hill Road. Smaller service lines extend from these trunk lines.

The number of customers receiving natural gas fluctuates slightly every month, due to economics, development and weather. In the month of February, 2025, Cascade served 527 customers in Sumas (453 residential, 69 commercial and 5 industrial).

7.1.2 Future conditions

Future expansion is based on economic feasibility. Cascade Natural Gas's growth includes new residences, commercial uses, and industrial uses, as well as existing buildings converting to natural gas from other forms of power. Factors influencing growth include the relative costs of gas and electricity, regional power planning priorities, and trends in growth and economic development. Because of Sumas' proximity to the Northwest Pipeline Corporation line, there are no physical limits to future natural gas capacity. When Cascade is contacted by a prospective customer, a feasibility analysis is conducted, and Cascade determines the improvements that would be needed to serve that customer or development and how such costs would be allocated. For major developments, the prospective customer may be required to pay the costs of system improvements necessary to serve the development.

7.2 Electricity

Sumas is unusual in that it owns and operates an electric utility that provides service within city limits. The following information about the electric system was provided by the public works director.

7.2.1 Existing conditions

Source and transmission. Sumas purchases power from the Bonneville Power Administration (BPA), a federally owned electric utility, under a contract that expires at the end of September 2028. BPA generates most of its power at hydroelectric facilities located on the Columbia River. Power from those facilities reaches Sumas through transmission lines operated by BPA and by Puget Sound Energy (PSE). Power is transmitted from the Columbia River to BPA's Custer substation through high-voltage lines owned by BPA. Power is transmitted from Custer to PSE's Schuett's Corner substation (2 miles south of Sumas) through high-voltage lines owned by PSE. At Schuett's Corner, the voltage is stepped down to 13 thousand volts (kV) and transmitted to Sumas along two routes. One route is along Garrison Road and Halverstick Road, and the other is along Telegraph Road, Hovel Road, and E. Front Street. Both routes arrive at Sumas' South substation, which is located on W. Front Street near the railroad lines. Power is metered at this substation before distribution within the city.

Distribution system. The city's distribution system is divided into two basic service areas, Circuit 12 and Circuit 16. As mentioned above, Circuit 12 comes from the southwest along Garrison Road and West Front Street, and Circuit 16 comes from the southeast along Hovel Road and East Front Street, meeting at the intersection of Johnson and West Front Streets. These are metered before going to the distribution service area. The Circuit 12 service area includes all of the area west of the BNSF railroad mainline, making up the Industrial Load, and Circuit 16 serves all of the area east of the BNSF railroad, making up the Commercial and Residential Load.

Conservation program. Sumas has three (3) programs to support conservation. The first one is a City program that offers rebates for a number of ENERGY STAR appliances including clothes washers, dishwashers, refrigerators and water heaters. The second program is the BPA Energy Efficient Incentive, which includes a custom project and a lighting project, plus various other programs. The third program is net metering, which allows Sumas residents and businesses to install renewable systems such as solar and/or wind and receive payment for power delivered to the electrical grid.

Private facilities. Significant privately-owned electric facilities are located in and around Sumas:

- A 123 megawatt gas-fired co-generation facility owned by PSE is located on the south side of W. Front Street, near the west city limits. The power generated at the facility supplies the regional power grid.
- Puget Power owns major facilities located in Sumas and is the provider of electrical service to the unincorporated area surrounding town. PSE's Sumas substation is located adjacent to

the co-generation facility, and two of PSE's 115 kV transmission lines pass through town along Front Street: the Sumas - Bellingham line, and the Sumas - Lynden line.

PSE has a public service obligation to furnish electrical service where and when demanded. Its service levels are regulated by the WUTC.

7.2.2 Future conditions

Based on growth in the industrial and residential areas, the City contracted with PSE in 2007 to upgrade Circuit 16 on the Hovel Road, to a larger conductor, and combining this with Circuit 12, enabling the City to increase its load capacity from 5 megawatts to 10 megawatts. In 2009, the City built a new overhead distribution line to feed IKO Pacific, which is the largest power consumer in Sumas, thereby allowing for more growth on our underground distribution system in the industrial area. As of 2025, the City is preparing to upgrade the electrical services along Bob Mitchell Avenue from a 200-amp capacity to a 600-amp capacity.. This would allow potential customers with large electrical needs to come to Sumas without having to worry about upgrading the system just for them.

Sumas constructed a new three (3) phase underground distribution line along Hovel Road to serve the new ball field and the UGA and UGA Reserve areas to the southeast of the city. The City also built a new three phase underground distribution line south along the new SR 9 highway to serve the UGA south of the city.

The City has an inter-local agreement with the Whatcom County Public Utilities District and the City of Blaine to share BPA conservation funds, equipment and personnel.

Private facilities. PSE plans to construct another 115 kV transmission connecting their Sumas substation to Nugent's Corner. The exact route of the line is not yet known, but it will probably follow SR 9, the B-N railroad tracks, or WSDOT's undeveloped right-of-way (originally intended as the new alignment for SR9). The proposed 115 kV line will be used to serve a future substation to be located near Nooksack and Everson, known as the Denson substation.

7.3 Telecommunications

7.3.1 Existing conditions

Telecommunication service is provided by Ziply Fiber, PogoZone, and Comcast. Frontier Communications continues to be available for landlines only. The main switching office for Sumas is located downtown at 233 Garfield Street. All calls from the city and the surrounding area are transmitted through this main office. Network services include, but are not limited to, POTS, Digital subscriber line (DSL) and Ethernet.

7.3.2 Future conditions

As more and more households continue to switch over to cellular devices only, the need to expand the local POTS network lessens. DSL and Ethernet may need to be expanded with new development but that will happen as needed and funded by the developers.

7.4 Goals and Policies

Goal 7.1. Provide access to private utilities to the residents of Sumas.

Policy 7.1.1: Whenever possible, the city should provide the private utilities with timely notice of the city's street and utility projects so that the utilities are able to coordinate construction and reduce overall infrastructure costs.

Policy 7.1.2: The city should encourage private utilities to expand service within Sumas to keep pace with development.

Policy 7.1.3: The city should notify private utilities regarding major developments, such as subdivisions, to support coordination on extension of utility services.

8 Economic Development Element

This chapter is a required element of a comprehensive plan that has been initially developed to meet the main provisions of the GMA. Further updates to this chapter are anticipated in the future (as funding becomes available) to ensure the chapter meets all of the requirements under the GMA. In overview, this chapter presents a brief description of the economic setting in Sumas followed by economic development goals and policies.

8.1 Economic Setting

8.1.1 Existing conditions

Sumas is a small town located immediately adjacent to the Canadian border and about twenty-five miles northeast of the city of Bellingham. An international border crossing station is located at the north end of town, and several major transportation facilities converge on and pass through Sumas. These transportation facilities include two state highways (SR 9 and SR 547) and two Burlington Northern Railway Company lines (the north-south main line and the Lynden spur). These transportation facilities and the proximity to Canada are the major factors that impact economic development in Sumas.

As described in the transportation element of this plan, the Sumas border crossing is one of the busiest in the county, both in terms of automobile and truck traffic and also pedestrian traffic. The border is one of two 24-hour commercial truck crossings in the county, and persons travelling by automobile utilize the border crossing to make connections between the lower mainland and points to the east in Canada and recreational and urban areas in Whatcom County and points south. The two state highways and the trans-Canada highway on the north side of the border help facilitate these connections. Many Canadians travel through the border on foot to purchase goods or collect mail at the several mail/shipping businesses in town. Because of these businesses, the Sumas crossing has been estimated to be the second largest pedestrian crossing along the US-Canada Border.

The exchange rate for the Canadian dollar has had and will continue to have a profound impact on business activity in Sumas. When the exchange rate is favorable for Canadians, the city experiences a boom in commercial activity. On the other hand, when the exchange rate goes the other direction, commercial activity slows substantially. During such times, the city has seen a number of businesses, especially commercial fueling stations, go out of business.

In 2020, when the Coronavirus Pandemic forced the US government to close all border crossings to everyone but priority travelers, businesses in Sumas who rely on Canadian travelers for their customer base suffered greatly.

The rail lines that run through town connect the city's industrial area to points north in Canada and points south, including Sedro-Woolley and beyond. A number of businesses have located in Sumas that are able to transport materials from Canada to be processed in the industrial area and then be shipped either back north or farther south to serve U.S. or international markets.

Unfortunately, this type of movement of goods does not result in substantial revenue for the city that could be used to support maintenance of the local infrastructure.

Part of the local infrastructure utilized by companies in the industrial area is the city's system of industrial roads built to Canadian heavy-haul standards. The presence of these roadways allows loads that are too heavy to travel on typical state highways in the U.S. to move between the industrial area and the international border without needing to unload and reload due to weight limitations.

Other factors that impact economic development in Sumas include the availability of relatively inexpensive water and electricity, both of which are public utilities owned and maintained by the city. The availability of these resources serves to attract businesses to town. Sumas also maintains some of the lowest utility connection charges in Whatcom County.

8.1.2 Future conditions

Sumas will continue to attract businesses through the planning period that benefit from a location near the Canadian border and that, in some cases, require access to an industrial site by way of a heavy haul road. Future upgrades to the regional rail system will also support increased rail traffic and businesses that rely on access to rail to transport their goods. The fluctuation of the Canadian dollar will have a strong effect on the expansion or contraction of businesses such as commercial fueling stations and food markets that rely heavily on customers coming down from Canada.

The planned increase in industrial jobs will support more local citizens being able to work locally and avoid needing to travel to other parts of the county for employment.

8.2 Goals and Policies

Goal 8.1: Maintain and increase access to the city's commercial area for local residents and those travelling through town.

Policy 8.1.1: The city should work with WSDOT and federal agencies to reduce back-ups at the international border crossing that block access to local businesses.

Policy 8.1.2: The city should work with WSDOT to ensure adequate room for vehicle queuing is provided.

Policy 8.1.3: Regulations limiting blockage of intersections should be enforced to ensure safe access to areas on both sides of SR 9.

Policy 8.1.4: The city should encourage new businesses serving local residents to locate along Sumas Avenue to avoid impacts associated with the state highway.

Policy 8.1.5: The city should continue to expand the local sidewalk system to increase safe access from residential areas to existing and future commercial areas.

Goal 8.2:Maintain and increase access to the city's industrial area.

Policy 8.2.1: The city should maintain existing roadways built to heavy-haul standards.

Policy 8.2.2: The city should consider options for generating revenue necessary to maintain the heavy-haul road network.

Policy 8.2.3: The city should work with property owners in the industrial area to expand the heavy-haul road network as part of proposed industrial developments.

Goal 8.3: Attract new businesses that provide jobs and serve the local and travelling public.

Policy 8.3.1: The city should work with local property owners to develop a regional truck stop to serve freight traffic moving through the international border.

Policy 8.3.2: The city council should continue to support new businesses or business expansion through the Economic Development fund.

9 Climate Change and Resiliency Element

This chapter is a newly required element of a comprehensive plan that was added with the adoption of HB 1181 in 2023. The bill amends the GMA to require a climate change and resiliency element that focuses on strategies that will allow jurisdictions to increase their resiliency against future impacts of climate change. The element is required to include two sub-elements: greenhouse gas (GHG) emissions reduction and climate resiliency.

The GHG emissions reduction sub-element is only required for cities with a population of at least 6,000 as of April 1, 2021, and in a county which is required to plan under RCW 36.70A.040. As Sumas' population on April 1, 2021 was estimated to be 1,740 residents, the City is not required to include a GHG emissions reduction sub-element in this element.

To conduct a clear and sufficient assessment of Sumas' climate change resiliency, the City looked to the Department of Commerce's climate element planning guidance which adapted the U.S. Climate Resilience Toolkit's "Steps to Resilience" framework. The adapted framework provides a five-step process for organizing a climate change and resiliency element, as well as developing goals and policies related to climate resiliency. The five steps listed in the framework are as follows:

Step 1. Explore Climate Impacts (Required)

Step 2. Audit Plan and Policies (Required)

Step 3. Assess Vulnerability and Risk (Optional)

Step 4. Pursue Pathways (Required)

Step 5 Integrate Goals and Policies (Required)

One of the pathways specified in Step 4 of the framework allows jurisdictions the ability to adopt by reference their local Natural Hazard Mitigation Plan (NHMP) in lieu of drafting an entire climate resiliency sub-element. The local NHMP for Sumas is the Whatcom County NHMP, adopted in 2021. Although the Whatcom NHMP provides essential information to perform Step 3 of the framework, it was passed prior to the adoption of HB 1181 in 2023, meaning that several requirements from that legislation are missing from the plan. Although this sub-element will heavily reference the Whatcom County NHMP, it will not adopt it by reference.

9.1 Climate Impacts

The first step gives jurisdictions the opportunity to take inventory of the community's most essential assets and how they may be affected by a changing climate. This step also allows you to identify potential climate hazards that may affect these assets. In Step 3 of the framework, specific community assets will be compared against potential climate hazards and each asset will be ranked based on vulnerability and risk.

9.1.1 Ecological Assets

Below is a list of ecological assets found within the City of Sumas. Although this list may not be exhaustive, the assets provided are the most likely to be affected by a changing climate, and the effects of that change could have severe impacts on the community.

9.1.1.1 Urban Tree Canopy

Trees provide essential services that help a community build resiliency against the effects of climate change. Adding tree coverage to a community helps to reduce the "urban heat island" as increased shade blocks harmful UV rays from reflecting off nearby streets and other impervious surfaces, thereby lowering the surface temperature of the community and providing relief against the intensity of the sun. Trees also provide the essential benefit of filtering carbon dioxide and other pollutants, as well as absorbing nearby stormwater runoff.

In 2024, City staff used a program called i-Tree® Canopy to provide statistics on the amount of tree coverage in Sumas and the benefits that the amount of tree coverage provides. The preliminary results shows that Sumas has an average tree coverage of roughly 21.5%. The program estimates that the existing tree canopy provides roughly $1,200,000 in carbon benefits, as well as an additional $47,000 per year in pollution removed, runoff avoided, and carbon secured.

9.1.1.2 Rivers and Streams

The waterways of Sumas provide some of the most beneficial habitats for local wildlife. They also help to promote a diverse and plentiful ecosystem throughout Sumas. Below is an analysis of the current conditions of the waterways of Sumas.

Sumas River. The headwaters of the Sumas River begin in the foothills east of the City of Nooksack. From there, the Sumas River heads north, along Sumas' eastern boundary, and merges with the Chilliwack River before merging with the Fraser River east of Abbotsford, B.C.

The stretch of the river near Sumas was heavily inundated with debris during the November 2021 flood event. Although most of the dangerous debris, contaminating the water, has been removed, a large amount of sediment has built up along the banks of the river, constricting the flow and providing an inhospitable environment for local fish.

The Sumas Water Improvement District (SWID) is a local group dedicated to preserving the Sumas River and its tributaries. They have been working closely with Whatcom County, the City of Sumas, and FEMA, to clear out the built up sediment in the river from Morgan Road north to the Canadian border. Debris removal is expected to take place in 2026.

Johnson Creek. Johnson Creek is a tributary of the Sumas River that begins west of Everson and travels northwest, through the center of Sumas, and merges with the river east of town. This creek bears the majority of the flood overflow from the Nooksack River. That means that this creek overtops its banks in Sumas during a flood, especially where constricted by the bridges at

Highway 9 and Sumas Avenue. Because of this, increased floodplain restrictions are enforced in surrounding neighborhoods. Replacement of both bridges to reduce flow restriction are being considered for the future.

Since Johnson Creek runs through the center of Sumas, it is highly shaped by the urban form around it, restricting its ability to adapt and redirect its flow over time. The urban surroundings also make Johnson Creek vulnerable to contamination from local litter.

Bone Creek. Bone Creek is a smaller tributary of the Sumas River that begins southeast of town and merges with the river near Sumas' southern boundary. This creek runs through Sumas' southern recreational campus which includes the rodeo grounds and ball fields. During the dryest months of the year, Bone Creek becomes completely dry, making it inhospitable for year-long use from fish.

During the 2021 flood event, a culvert going over Bone Creek at Hovel Road was completely clogged by debris, and floodwater building up behind it threatened to flood nearby neighborhoods that had so far managed to stay dry. To prevent the flooding of these homes, city crew were forced to use emergency measures to dismantle the culvert, allowing floodwater to flow through and on their way to the Sumas River, but also isolating the nearby neighborhood from the rest of Sumas. Shortly after the flood, a smaller temporary culvert was built in its place, restricting the roadway width of that section of Hovel Road to a single lane. Plans to build a larger more permanent culvert, or a full bridge, are currently in the works. Funds for the design and construction of the permanent facility will be paid for by FEMA as part of Sumas' recovery effort.

Sumas Creek. Sumas Creek is a tributary of Johnson Creek, beginning near the Sumas Wellfield in the northwest corner of town, and continuing east and then south before converging with Johnson Creek just upstream of the Burlington Northern Railroad bridge. Despite its status as a second-order tributary to the Sumas River, it has an unexpectedly high rate of flow for its size. It runs adjacent to the 24-acre wetland mitigation bank located at the southeast corner of Kneuman Road and Barbo Road, providing essential habitat for local wildlife. The creek is frequently obstructed by beaver dams, requiring city crew to remove the obstruction before the backup begins to flood neighboring facilities. Due to its vicinity to the wetland mitigation bank and its relatively forested surroundings, Sumas Creek provides the best habitat for local wildlife of all the streams, including anadromous fish which have been observed in the creek.

9.1.1.3 Groundwater

Sumas exists overtop of the Sumas-Abbotsford Aquifer, a large repository of groundwater that spans from the northern reaches of the City of Abbotsford, B.C., to the Nooksack River near Lynden. Sumas draws all of its potable and non-potable water from the aquifer. The water drawn from this repository is so clean that it goes through very minimal treatment before joining the Sumas drinking water system. The protection of this water source is incredibly important to the people of Sumas, and a large wellhead protection district has been established around the Sumas wellfield in the northwest corner of town. A map of the wellhead protection district can be found in the 1996 Sumas Wellhead Protection Plan adopted by reference in the Water System section of the Capital Facilities Element in this plan.

9.1.2 Social Assets

Below is a list of manmade assets that provide essential services to the community of Sumas and which would be greatly impacted by a changing climate.

9.1.2.1 Infrastructure

Water System. The Sumas municipal water system is vulnerable to very few hazards given that the majority of the system is underground. However, in the event of an earthquake, major breaks in the piping could lead to major leakage and water loss. As well, although no evidence of this exists, certain land-based hazards such as earthquakes or liquefaction could theoretically damage Sumas' well fields at the northwest corner of town. In that event, the City has backup wells located off May Road that can be reallocated to help keep the system pressurized in an emergency.

Sanitary and Storm Sewer Systems. The City of Sumas' sewer and stormwater systems are similar to the water system in that the majority of the infrastructure is underground. However, unlike the water system, the sewer and storm systems were damaged during the November 2021 flood event due to above-ground assets of the system being inundated with flood waters. This historical evidence adds flooding to the list of hazards which could prove significant to the sanitary and storm sewer systems.

Electrical System. Sumas is unique in that it owns its own electrical utility, whereas most other municipalities in Whatcom County contract through Puget Sound Energy. This ownership allows the City to make decisions regarding the electrical system that other municipalities would have to run by a third party first. During the November 2021 flood event, the City chose to turn off the electrical system hours into the event. This decision was made out of an abundance of caution, as it was unclear with this level of flooding how a live electrical system would endanger the lives of the residents that remained. Those who chose to stay in Sumas were left in the dark as the event carried on into the night.

9.1.2.2 Critical Facilities

For an inventory of the critical facilities in Sumas most affected by climate change, the City turns to those highlighted in the Whatcom County NHMP's Sumas profile. These facilities, summarized below, were identified as posing the highest risk of damage from various climate hazards.

American Legion Hall. The Sumas American Legion Hall is located at 134 Harrison Avenue. It provides a central location for community gatherings, and the American Legions provides a solid volunteer base for the community. Plans for the upcoming Sumas LPOE Expansion project at the border crossing involve the acquisition and demolition of the Sumas American Legion Hall. There are currently no plans to relocate the local American Legion chapter to a different location in Sumas.

Sumas Elementary School. The Sumas Elementary School is located at 1024 Lawson Street. The school underwent a complete reconstruction from 2020 to 2022. This reconstruction allowed the school to have a foundation that is several feet higher than previously. This means that the school provides a solid evacuation center in the event of minor floods.

Nooksack Valley High School. The Nooksack Valley High School is located out in Whatcom County at 3326 E. Badger Road. During the 2021 flood event, the High School became the primary evacuation center for the people of Sumas. The facility is raised on fill and so is safe from flooding, despite its location in the direct path of flood waters.

May Road Wellfield. The May Road Wellfield is located at 9700 May Road. It is Sumas' secondary wellfield to the Sumas City Wellfield and mostly provides pressure support for the Sumas Water System and provides the non-potable water to the Puget Sound Energy facility. This site is higher in elevation than the rest of Sumas and is thus safe from the majority of the flooding.

Nooksack Valley Middle School. The Nooksack Valley Middle School is located in the City of Nooksack at 404 W. Columbia Street. The school is located near the Nooksack River but could be used as an evacuation center if the High School is unavailable.

Sumas City Hall. The Sumas City Hall is located at the municipal campus at 433 Cherry Street. The campus is relatively low in elevation and is susceptible to flooding. During the 2021 flood event, water levels in City Hall were estimated to be roughly five feet in some areas.

Sumas City Reservoir. The Sumas City Water Reservoir consists of two water tanks near the eastern face of Moe Hill in the northern part of Sumas. The tanks are elevated high above the town below and are generally safe from flooding.

Sumas City Wellfield. The Sumas City Wellfield is located off Kneuman Road, near the western slope of Moe Hill. The access to the wellfield involves a small bridge over Sumas Creek. During the 2021 flood event, this access bridge was damaged. Repairs to the access bridge will be paid for by FEMA as part of our disaster recovery effort.

Puget Sound Energy. The Puget Sound Energy facility is located at 601-B W. Front Street. The facility is used as a steam co-generation plant, providing electricity for Puget Sound Energy.

Sumas Fire Station. The Sumas Fire Station is part of Whatcom County Fire District No. 14. The main station for the fire district is in Kendall, WA. The Sumas station is not full-time and is generally operated by volunteers.

Sumas Police Department. The Sumas Police Department is located at the municipal campus at 433 Cherry Street. It suffered similar damage from the flood to City Hall, since the two are in the same building.

Sumas Senior Center. The Sumas Community Center is a jointly owned facility that houses both the Sumas Senior Center and the Sumas Library. Although the City owns the building, the Senior Center is also partially funded by the Whatcom County Parks Department. The Sumas Library is operated by the Whatcom County Library System (WCLS).

Sumas Water & Lights. Sumas Water & Lights is part of the City of Sumas Public Works Department. It is located at the municipal campus at 433 Cherry Street and includes a separate storage facility at 3798 Kneuman Road.

Sumas Customs & Border Patrol. The Sumas Land Port of Entry (Sumas LPOE) is a land crossing between the United States and Canada, serving both personal and commercial vehicles. The facility is located at 109 Cherry Street and is operated by the Customs and Border Protection (CBP) agency.

Williams Gas Pipeline. Williams is a natural gas pipeline with a facility located just east of Sumas City Limits at 4378 Jones Road. The facility oversees the passage of millions of gallons of natural gas per year between the Western United States and Western Canada. This gas pipeline facility is incredibly flammable and combustible, so protecting the facility is of utmost importance.

U.S. Border Patrol. The Sumas U.S. Border Patrol station is located in the southwest corner of town at 9648 Garrison Road. This facility is the local headquarters for the U.S. Border Patrol. It is a secure facility with berms built up around the perimeter of the property to keep the facility safe from flooding.

9.1.3 Climate Hazards

The Whatcom County NHMP highlights specific climate hazards that individual jurisdictions within the county are most impacted by. For Sumas, the NHMP highlighted flooding as a major hazard impacting the city, but also identified earthquakes, liquefaction, landslides, and volcano eruptions other hazards of concern.

9.1.3.1 Flooding

The NHMP identifies flooding as the only hazard with a high potential for impact. It describes the effect of the February 2020 flooding event, locally referred to as the "Super Bowl Flood" which saw water depths of one to three feet throughout the low-lying areas of Sumas. When flooding occurs in Sumas, the worst of it originates from the Nooksack River which, during a flood event, overtops its banks at Everson and flows northeast through Sumas and into British Columbia where it drains into the Fraser River and is sent to the Salish Sea. During large flood events, floodwater covers about 85% of Sumas' land cover with only homes atop Moe Hill being the only structure absolutely safe from flood damage.

The NHMP was adopted about 1.5 months before the November 2021 flood event, which was the largest in living memory in Sumas. Flood depths reached three to five feet during the peak of the event and about 85% of structures in Sumas were damaged. Flood recovery efforts are still underway and a few structures are still in the process of being repaired from the flood. The psychological impact that the November 2021 has had on the residents of Sumas is very prevalent during fall and winter months, when water levels rise of the Nooksack River rise in response to high accumulation snow melt from the Mount Baker.

The NHMP identifies flooding as providing a high risk to Sumas with an exposure area of 88.5%.

9.1.3.2 Earthquakes

Sumas exists near the Boulder Creek fault, which a part of a series of faults located near the confluence of the North American and Juan de Fuca tectonic plates. In 2017, the Washington State Department of Natural Resources (WA DNR) studied the effects of how a magnitude 6.8 earthquake along the Boulder Creek fault might impact surrounding communities. The study concluded that a majority of Sumas would experience severe/violent shaking intensity as rated using the Modified Mercalli Intensity (MMI) scale.

The NHMP identifies earthquakes as providing a moderate risk to Sumas, noting that risk is increased due to the high concentration of some of Whatcom County's oldest homes within the city. The identified exposure area for an earthquake is 99.9%.

9.1.3.3 Liquefaction

The NHMP references a study done by WA DNR which examined the susceptibility of Sumas to the effects of liquefaction. A majority of Sumas was identified as having a moderate to high susceptibility with Moe Hill having a very low to low susceptibility. The NHMP identifies liquefaction as providing a low risk to Sumas with an exposure area of 91.5%.

9.1.3.4 Landslides

The NHMP notes that there is a specific hazard of a landslide occurring along the steep slopes of Moe Hill. The City has identified a landslide along Moe Hill as a hazard of priority, especially around where Arthurs Way snakes up Moe Hill and provides the only access point to the homes at the top of the hill. The City has prioritized actions to stabilize the hillside near Arthurs Way. The NHMP identifies landslides as providing a low risk to Sumas with an exposure area of 0%.

9.1.3.5 Volcano

The City of Sumas, along with the rest of Whatcom County, exists at the western base of Mt. Baker, an active stratovolcano in the Cascades Mountain Range. The latest confirmed volcanic activity from Mt. Baker occurred around 6,600 years ago. It is estimated that magma from Mt. Baker formed a lahar and travelled down the Middle Fork of the Nooksack River before flowing north and into the Fraser River. If volcanic activity of this magnitude were to occur again, the NHMP indicates that Sumas might be at risk of a similar lahar from Mt. Baker. The plan identifies volcanic activity as providing a low risk to Sumas with an exposure area of 88.9%.

9.1.3.6 Hazards of No Risk

The NHMP identifies tsunami, mine hazards, and wildfire as hazards of no significance to Sumas, although it does identify wildfire as having an exposure area of 17.5%.

9.1.4 Climate Hazard Priorities

Sumas' history of flooding highlights how much of a priority that hazard takes over the others listed. The overland flow of water from the Nooksack Water has done more damage to Sumas

than all of the other hazards combined. Finding ways to mitigate and prevent the amount of loss from flooding is one of Sumas' top priorities, and one that will not be resolved quickly. Differences in priorities between various jurisdictions make finding one single solution to the overland flooding issue essentially impossible. Although work on finding the best solution will continue, Sumas continues to look for opportunities within city limits to mitigate the impacts.

Of the remaining hazards, earthquakes continue to be the hazard of next highest priority. Although this hazard has a significantly lower frequency rate, Sumas' location near the Boulder Creek fault line, as well as the Cascadia fault line, make damage from earthquakes likely. To mitigate the potential impacts of earthquakes, all structures are built using construction and engineering practices that will hopefully limit the amount of damage that takes place as a result of earthquakes.

Landslides and liquefaction are more likely to occur than earthquakes but would be less damaging were they to happen. Moe Hill, in the northwest corner of town along the north side of Kneuman Road, is where these hazards are likely to occur. Since the heavy rains that provided the 2021 flood event, a decrease in integrity of some of the slopes along Moe Hill have been observed, and the City is working alongside FEMA to perform some preventative measures to prevent any further sliding.

The remaining hazards are those categorized as posing no significant risk to Sumas, and volcano. The risk of a volcanic eruption is quite low considering Mount Baker's relative dormancy compared to other volcanoes in the same range. However, if Mount Baker were to erupt, there is a risk of a lahar following the middle branch of the Nooksack River and then up the Sumas River to town. The remaining hazards that pose no significant risk to Sumas are wildfire, mine hazards, and tsunamis. There are no mines in and around Sumas and the town is too far inland to be affected by tsunamis. Although the risk is very low, wildfire could reach Sumas. Most wildfires start up in the forested foothills of Mount Baker and make their way to more urban areas. Sumas' location amongst several miles of agriculture makes the wildfires reaching the town very unlikely, which is why there is no significant risk from the hazard, but can still happen given the perfect circumstances. Either way, the City continues to build new construction to fire code to avoid a manmade fire in town turning into a wildfire.

9.2 Existing Plan Review

9.2.1 2016 Comprehensive Plan

The 2016 update to the Sumas Comprehensive Plan is the most recent of the periodic major updates that have been going since the plan was initially adopted in 1995. During that time, many changes have been made to the GMA and the requirements of what must be included in the Comprehensive Plans. Washington State House Bill 1181 (HB 1181), adopted in 2023, was the legislation which required the inclusion of this chapter into all cities' Comprehensive Plans. Despite the fact that this legislation was adopted after the existing Comprehensive Plan was adopted, there are still aspects of the existing Comprehensive Plan that foster environmental resiliency. Listed below are a few areas where the existing Comprehensive Plan and development regulations already meet the requirements of HB 1181.

9.2.1.1 Existing Goals and Policies

Land Use Element. The 2016 Comprehensive Plan's Land Use goals and policies reflect the growing movement to protect against the expansion of urban development into what can be considered green spaces. This is done by encouraging the construction of more dense forms of development and focusing on filling in the buildable lands that have already been annexed into the city. The element's goals and policies relating to industrial development serve a similar purpose by encouraging the establishment of businesses that provide job opportunities for local residents, thereby reducing the amount of greenhouse gas emissions caused by Sumas' residents driving to work. This element also has several goals and policies related to the protection of the natural environment and to create inviting park and trail spaces for people to enjoy the natural beauty of Sumas.

Capital Facilities Element. The goals and policies of the Capital Facilities Element of the 2016 Comprehensive Plan have a more indirect approach which promotes resiliency. This Element encourages the use and construction of capital facilities which allocates the cost fairly among the population, while also promoting efficiency in the placement and construction practices of Capital Facilities.

Housing Element. Similar to the Land Use Element, while this chapter does not focus as much on promoting sustainability through indirect means, the goals and policies do encourage higher density development which reduces the amount of open space taken up by urban development.

Transportation Element. The Transportation Element of the 2016 Comprehensive Plan provides certain goals and policies which promote the use of pedestrian infrastructure and bus transit as alternative forms of transportation to single-occupancy vehicles (SOV). They do promote certain road construction practices meant to reduce the impacts to groundwater, greenhouse gas emission, and noise levels within the community. The goals and policies do not, however, promote bicycle infrastructure in town.

Utilities and Economic Development Elements. The goals and policies of these two elements have significantly less to do with promoting environmental resiliency in Sumas. The Utilities Element goals and policies promote retaining the same levels of service for our utilities that the town currently has, and the Economic Development goals and policies promote the preservation and expansion of economic opportunities in Sumas. Similar to the Land Use Element, this does indirectly benefit climate resilience in Sumas by promoting businesses that keep jobs in Sumas, reducing greenhouse gas emissions.

9.2.1.2 Critical Areas and Resource Lands

The City's Critical Areas Ordinance (CAO) is codified as Chapter 15.20 of the Sumas Municipal Code (SMC). This chapter of the SMC outlines restrictions designed to protect critical environmental resources in the city from the negative effects of development. The Critical Areas and Resource Lands section of the Land Use Element chapter of the 2016 Sumas Comprehensive Plan outlines the regulations of the CAO as well as other climate-conscious development regulations such as Chapter 14.30 *Flood Damage Prevention* and Chapter 15.04 *Shoreline Management*. Chapter 15.04 is supported by the goals and policies outlined in the *Sumas Shoreline Master Program,* most recently updated in 2023. The Critical Areas and Resource

Lands section of the Land Use Element chapter has been carried forward to this update to the Sumas Comprehensive, including changes that have been made to the above development regulations since the adoption of the 2016 Plan.

9.3 Vulnerability and Risk Assessment

9.3.1 Critical Facilities

The table below, provided by the Whatcom County Natural Hazard Mitigation Plan, lists critical facilities pertaining to Sumas and identifies which hazards the facilities may be subject to.

Table 9-1. Critical Facilities Ranking Table

Facility Name	Facility Type	Significance	EQ	LQ	LS	TSU	VOL	FL	COA	WF	Rank Assessment
American Legion Hall	EF	1	1	1	0	0	1	1	0	0	0.33
Elementary School - Dist. 506	EF	2	1	1	0	0	1	1	0	0	0.66
High School - District 506	EF	2	1	1	0	0	1	1	0	0	0.66
May Road Wellfield	LUS	3	1	1	0	0	1	1	0	0	1
Middle School - District 506	EF	1	1	1	0	0	1	1	0	0	0.33
Sumas City Hall	EF	3	1	1	0	0	1	1	0	0	1
Sumas City Reservoir	LUS	3	1	1	0	0	1	0	0	0	0.86
Sumas City Wellfield	LUS	3	1	0	0	0	1	0	0	1	0.86
Puget Sound Energy	LUS	1	1	1	0	0	1	1	0	0	0.33
Sumas Fire Station	EF	3	1	1	0	0	1	1	0	0	1
Sumas Police Dept.	EF	3	1	1	0	0	1	1	0	0	1
Sumas Senior Center	EF	2	1	1	0	0	1	1	0	0	0.66
Sumas Water & Lights	EF	3	1	1	0	0	1	1	0	0	1
Sumas - CBP	EF	2	1	1	0	0	1	1	0	0	0.66
Williams Gas Pipeline	HMF	2	1	1	0	0	1	1	0	0	0.66
U.S. Border Patrol	EF	3	1	1	0	0	1	1	0	0	1

Notes

Hazard Type: **EQ** = Earthquake; **LQ** = Liquefaction; **LS** = Landslide; **TSU** = Tsunami; **VOL** = Volcano; **FL** = Riverine Flooding; **COA** = Coastal Flooding; **WF** = Wildland Fire

Facility Type: **EF** = Essential Facility; **HMF** = Hazardous Materials Facility; **HPL** = High Potential Loss; **LUS** = Lifeline Utility System

Significance to community function: **1** = Moderate; **2** = High; **3** = Very High

The ranking of the facilities is based on the following formula:

$$\textbf{Rank} = \text{Significance}^* \left[\frac{\text{EQ Zone}}{\text{EQ Freq.}} + \frac{\text{LQ Zone}}{\text{LQ Freq.}} + \frac{\text{LS Zone}}{\text{LS Freq.}} + \ldots \frac{\text{WF Zone}}{\text{WF Freq.}} \right]$$

Ranking value was scaled from 0 to 1, scaled to the highest ranking in the jurisdiction.

Hazard frequency is based on a qualitative assessment of hazard frequency across the entire county. Riverine and coastal flooding were given a frequency value of 3. Earthquake, liquefaction, landslide, and wildfire were given a frequency value of 2. Tsunami and Volcano were given a frequency value of 1.

This table ranks the May Road Wellfield, Sumas City Hall, Sumas Fire Station, Sumas Police Department, Sumas Water & Lights, and the U.S. Border Patrol as having the highest risk from the listed potential hazards.

9.3.1.1 Sumas City Hall, Police Department, and Water & Lights

Each of these facilities is located on the same campus at 433 Cherry St. In the November 2021 flooding event, flood depths in the City Hall and Police Department were said to peak at around five feet. Similar flood depths were recorded in the Water & Lights garage and multiple city vehicles were damaged in the event. The building is also quite old, having previously been used as a fire station before the new one was constructed at 143 Columbia Street. This means that the building is at a higher risk of damage from earthquakes and liquefaction.

9.3.1.2 May Road Wellfield

The May Road wells sit on the side of a hill east of the city limits. These wells help to provide the potable and non-potable water for Sumas. A small creek runs through the site, providing some risk of riverine flooding. The wells themselves are artesian wells, pumping water from a large aquifer, so they are at large risk of damage in the event of earthquakes or liquefaction.

9.3.1.3 Sumas Fire Station

The Sumas fire station sits at a similar elevation to Sumas City Hall and thus has the same hazards and risks.

9.3.1.4 U.S. Border Patrol

The U.S. Border Patrol station on Garrison Road is located in the path of the flood waters as they leave Everson and make their way to Sumas. However, the facility is built up on several feet of fill, making it generally safe from flooding. It does, however, have the same earthquake, liquefaction, and volcano hazards as the others on this list.

9.4 Goals and Policies

In consideration of the risks identified within this chapter, the City of Sumas adopts the following goals and policies:

Goal 9.1: Create building design standards that help to reduce the impacts of climate change and increase resilience for all buildings in the city.

> Policy 9.1.1: Ensure that the City's energy infrastructure is built in such a way that allows it to withstand and recover quickly from natural hazard events such as flooding.
>
> Policy 9.1.2: Install renewable energy generation and battery infrastructure at public facilities to store renewable electricity generated on site and provide emergency power that ensures continuity of operations.
>
> Policy 9.1.3: Design buildings for passive survivability to ensure that they will stay at a safe temperature for occupants if the power goes out.

Goal 9.2: Ensure environmental justice by providing residents with an equitable opportunity to learn about climate impacts, influence policy decision, and take actions to enhance community resilience.

> Policy 9.2.1: Create and implement culturally contextualized outreach and education initiatives and materials that will inform the community about near-term and longer-term climate change threats and build resilience.
>
> Policy 9.2.2: Build and support partnerships with community-based organizations with the capacity and relationships to convene diverse coalitions of residents and to educate and empower them to implement climate resilience actions.

Goal 9.3: Ensure that the local economy is resilient to disruption based on climate change and natural hazards.

> Policy 9.3.1: Support local businesses' efforts to bolster climate preparedness and continuity of operations.

Goal 9.4: Enhance emergency preparedness, response, and recovery efforts to mitigate risks and impacts associated with natural hazard events such as flooding.

> Policy 9.4.1: Create and maintain evacuation plans and outreach materials to help residents plan and practice actions that make evacuation quicker and safer.
>
> Policy 9.4.2: Map transportation infrastructure that is vulnerable to repeated floods, landslides, and other natural hazards, and designate alternate travel routes for critical transportation corridors when roads must be closed.
>
> Policy 9.4.3: Develop resilience hubs – community-serving facilities that are designed to support residents, coordinate communication, and distribute resources.

Goal 9.5: Protect community health and well-being from the impacts of climate-exacerbated hazards and ensure that the most vulnerable residents do not bear disproportionate health impacts.

Policy 9.5.1: Address the social and mental health needs of displaced populations following disasters.

Policy 9.5.2: Protect the health and well-being of outdoor workers exposed to extreme heath and other climate-exacerbated hazards.

Policy 9.5.3: Ensure that all community members have equitable access to green space within a half mile.

Policy 9.5.4: Review land use maps and identify opportunities or barriers to responding to rapid population growth or decline, rebuilding housing and services after disasters, and other extreme climate impact scenarios.

Goal 9.6: Ensure the protection and restoration of streams, riparian zones, estuaries, wetlands, and floodplains to achieve healthy watersheds that are resilient to climate change.

Policy 9.6.1: Implement actions identified in restoration and salmon recovery plans to improve the climate resilience of streams and watersheds.

Policy 9.6.2: Protect and restore riparian vegetation to reduce erosion, provide shade, and support other functions that improve the climate resilience of streams.

Policy 9.6.3: Protect and restore wetlands and corridors between wetlands to provide biological and hydrological connectivity that fosters resilience to climate impacts

Policy 9.6.4: Identify opportunities to expand habitat protection and improve habitat quality and connectivity to foster climate resilience using conservation area designations, buffers, and open space corridors.

Policy 9.6.5: Manage tree canopy and forests (including parks and open spaces) to decrease climate-exacerbated risks from severe wildfires, protect residents, and improve ecosystem health and habitat functions.

Goal 9.7: Ensure that the local transportation system – including infrastructure, routes, and travel modes – is able to withstand and recover quickly from the impacts of extreme weather events and other hazards exacerbated by climate change.

Policy 9.7.1: Incorporate hydrologic climate impacts into the design of water-crossing structures (i.e., climate-smart culverts and bridges).

Policy 9.7.2: Improve street connectivity and walkability, including sidewalks and street crossings, to serve as potential evacuation routes.

Policy 9.7.3: Reduce stormwater impacts from transportation and development through watershed planning, redevelopment and retrofit projects, and low-impact development.

Policy 9.7.4: Enhance the resilience of parks and recreational trails by assessing and addressing climate hazards and impacts.

Goal 9.8: Protect and preserve water quality and quantity from drought, extreme heat, and other hazards exacerbated by climate change.

Policy 9.8.1: Utilize water conservation methods and technologies in development of irrigation infrastructure within parks and recreation areas so as to foster climate resilience.

Policy 9.8.2: Evaluate the long-term adequacy of water delivery infrastructure to ensure that changes in hydrological patterns (i.e., increases in flooding frequency or reduction of late-summer water availability associated with climate change) can be anticipated and managed effectively.

Policy 9.8.3: Manage water resources sustainably in the face of climate change through smart irrigation, stormwater management, preventative maintenance, water conservation, and wastewater reuse, plant selection, and landscape management.

Goal 9.9: Establish land use patterns that increase the resilience of the built environment, ecosystems, and communities to climate change.

Policy 9.9.1: Establish overlays, special zoning districts, design standards, or other strategies to increase resilience to climate hazards.

Policy 9.9.2: Direct new development into areas where exposure to climate hazards is low.

Policy 9.9.3: Maintain and update a critical areas ordinance that incorporates climate change considerations.

Policy 9.9.4: Identify and protect agricultural and forested lands that provide climate resilience benefits from conversion to more developed intensive land use types.

Policy 9.9.5: Establish development regulations that incorporate best practices for reducing the risk of wildfire, extreme heat, flooding, and other climate-exacerbated hazards.

Policy 9.9.6: Acquire properties or easements on properties that are vulnerable to climate-exacerbated hazards and that are or will become unsuitable for development.

Policy 9.9.7: Facilitate and support long-term community visioning including consideration of managed retreat from high-hazard areas.

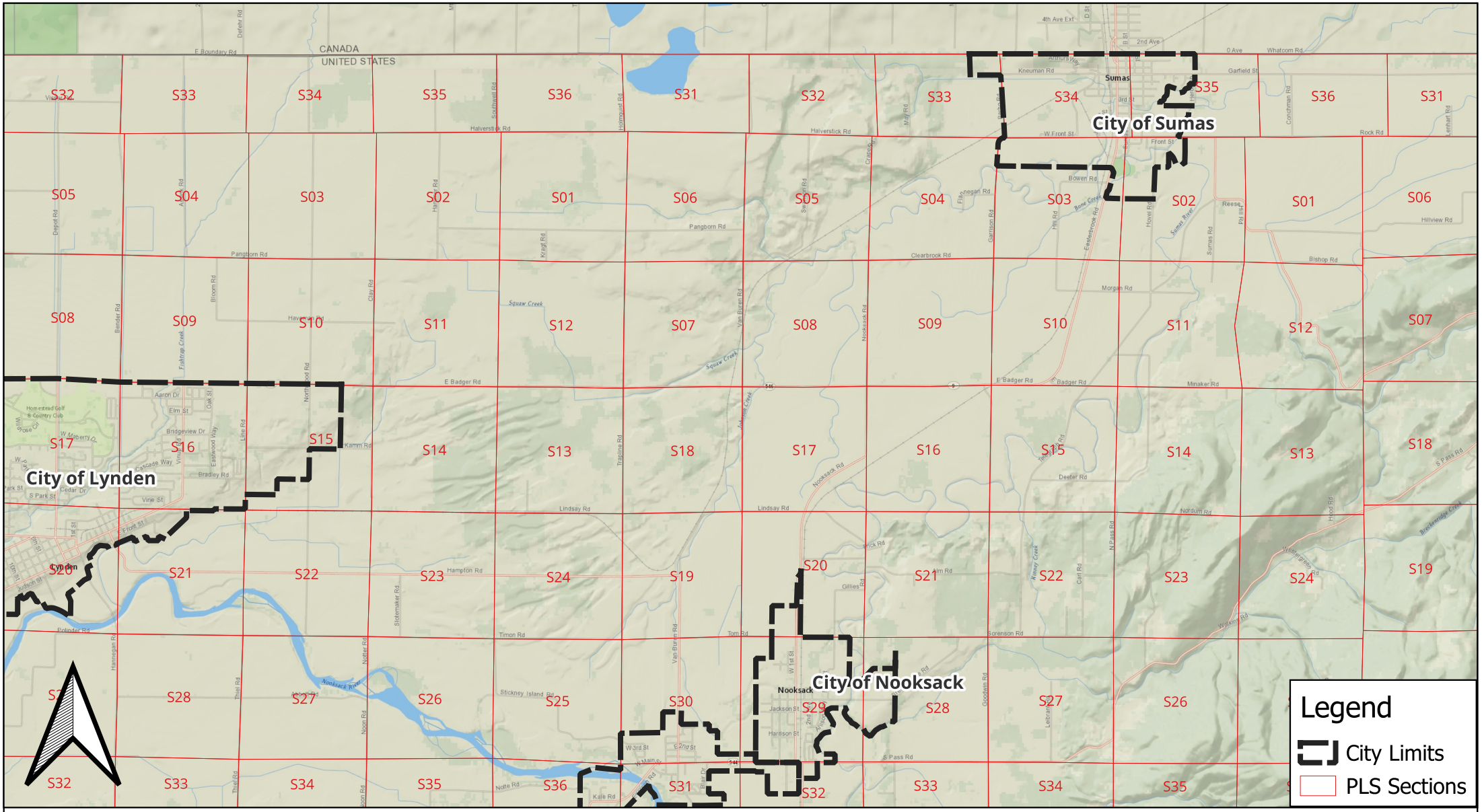
Policy 9.9.8: Consider future climate conditions during siting and design of capital facilities to help ensure they function as intended over their planned life cycle.

Policy 9.9.9: Identify and plan for climate impacts to valued community assets such as parks and recreation facilities, including relocation or replacement.

10 Shoreline Management Element

Consistent with the GMA, the Shoreline Management Act and WAC 173-26 (the Shoreline Master Program Guidelines), the goals and policies from the Sumas Shoreline Master Program shall constitute the Shoreline Management Element of the city's comprehensive plan. The Sumas city council approved a major update of the Sumas Shoreline Master Program (SMP) on October 23, 2023 through adoption of Ordinance No. 1806. The Shoreline Management Element of this comprehensive plan shall adopt by reference the goals and policies of the 2023 revisions of the Sumas Shoreline Master Plan.

Maps and Figures



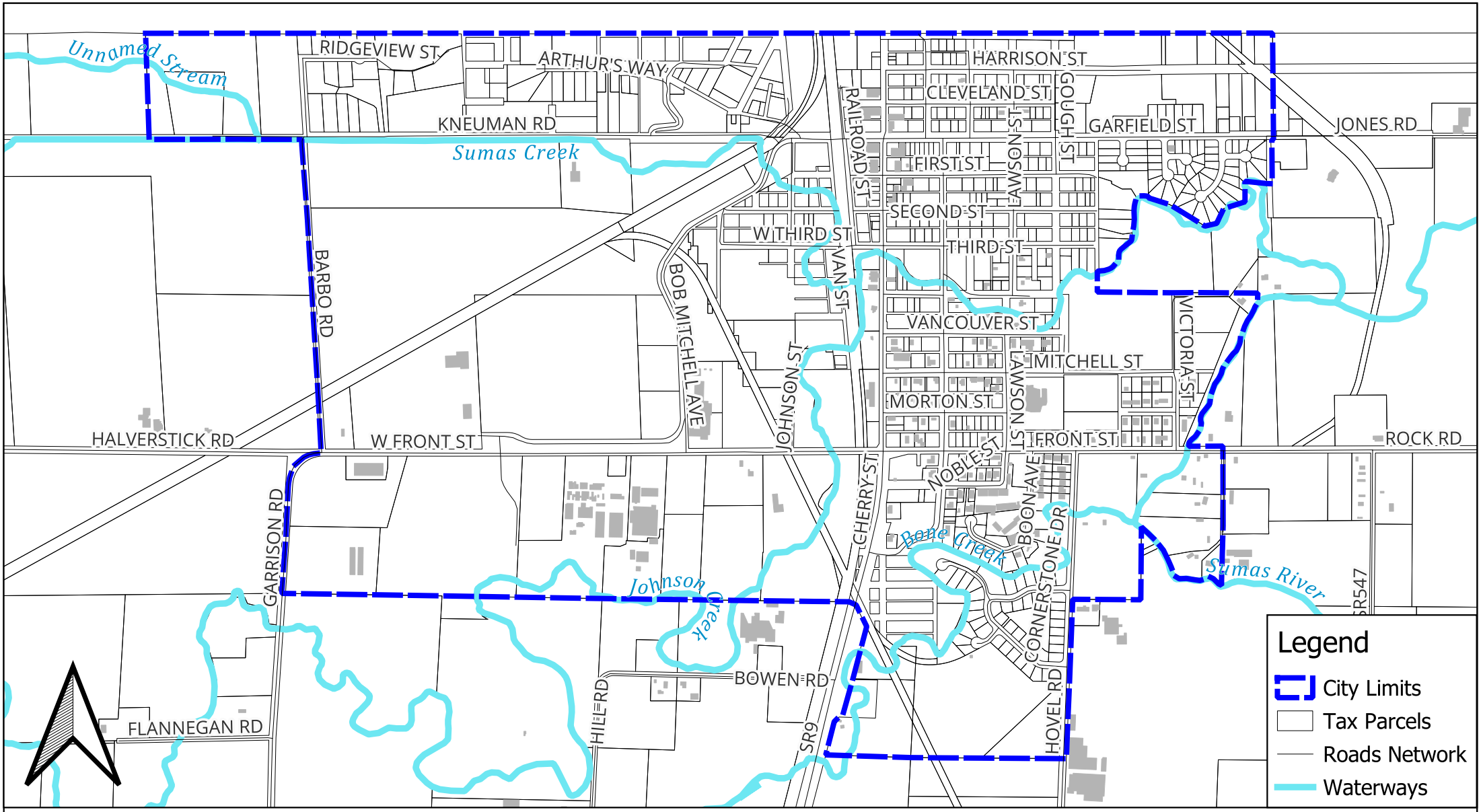
City of Sumas, WA
Map 1A
Environs

Projection:
UTM Zone 10 North
NAD 27
Scale: 1:100,000

Data Sources:
Whatcom County
Assessor's Office &
Planning Department and
the City of Sumas

CITY OF SUMAS
A GREAT PLACE TO LIVE AND DO BUSINESS

Date: August 11, 2025



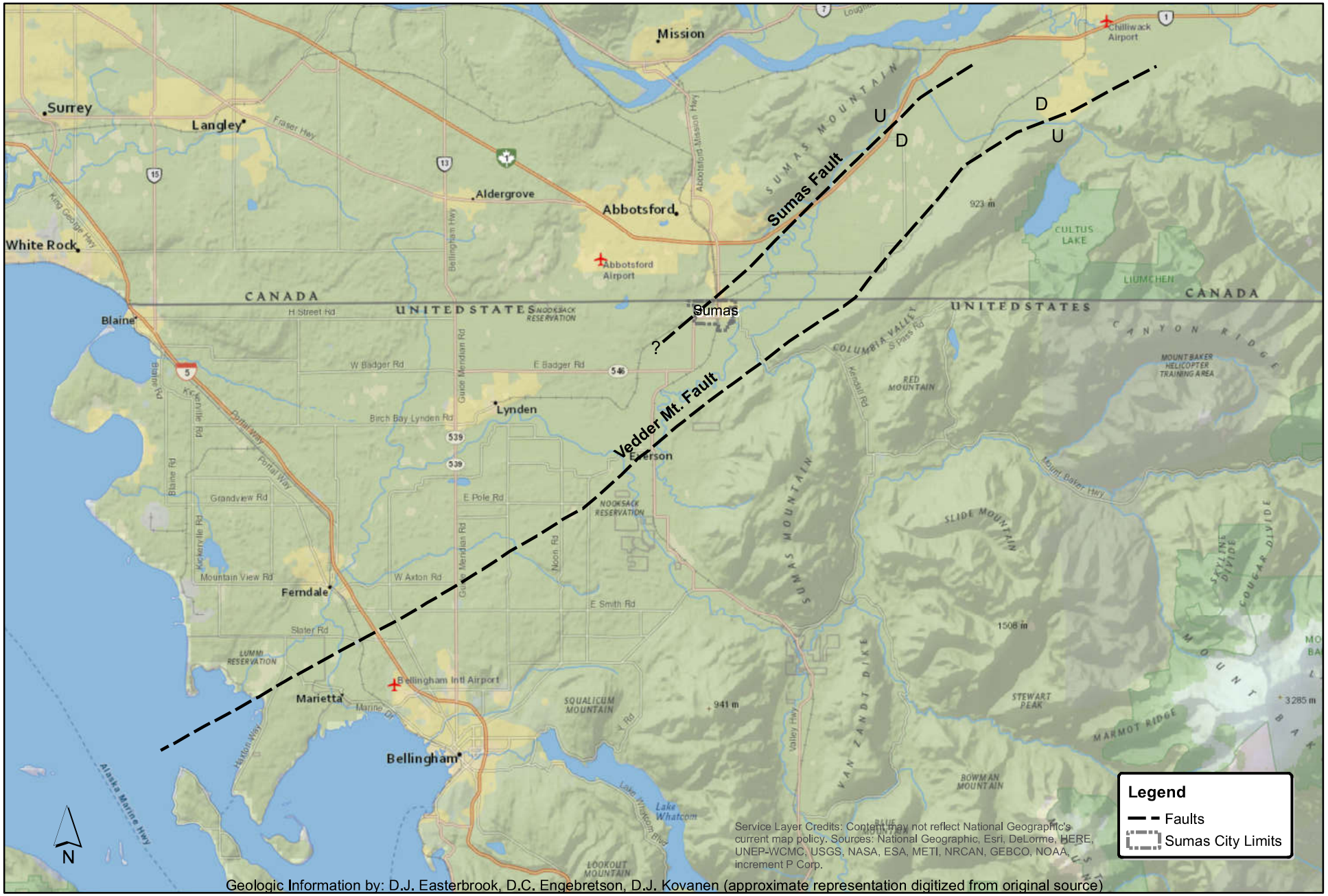
City of Sumas, WA
Map 1B
Base Map

Projection:
UTM Zone 10 North
NAD 27
Scale: 1:20,000

Data Sources:
Whatcom County
Assessor's Office &
Planning Department and
the City of Sumas

CITY OF SUMAS
A GREAT PLACE TO LIVE AND DO BUSINESS

Date: August 11, 2025



Geologic Information by: D.J. Easterbrook, D.C. Engebretson, D.J. Kovanen (approximate representation digitized from original source)

1 inch = 5 mile

0 2.5 5 7.5 10 Miles

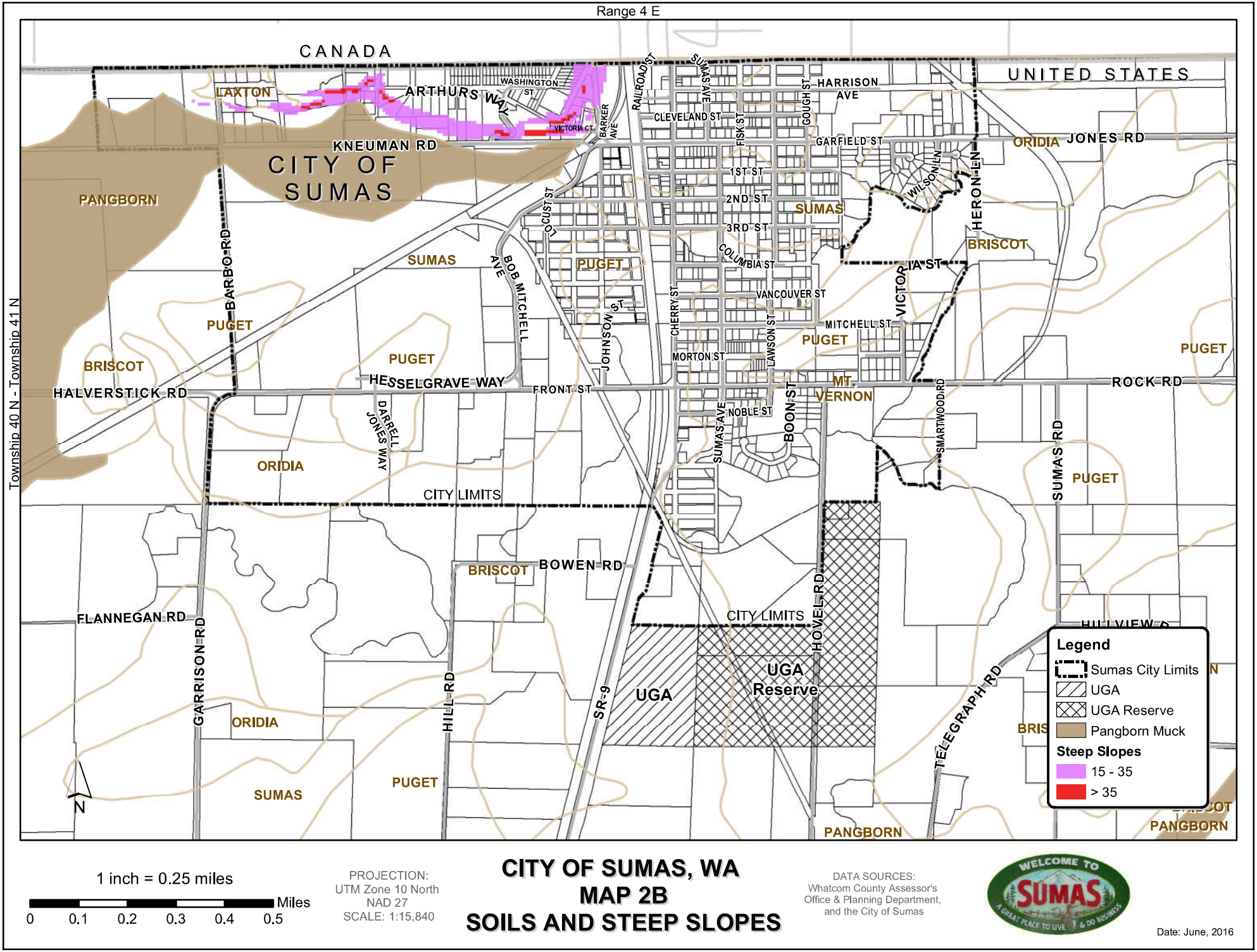
PROJECTION:
UTM Zone 10 North
NAD 27
SCALE: 1:63,360

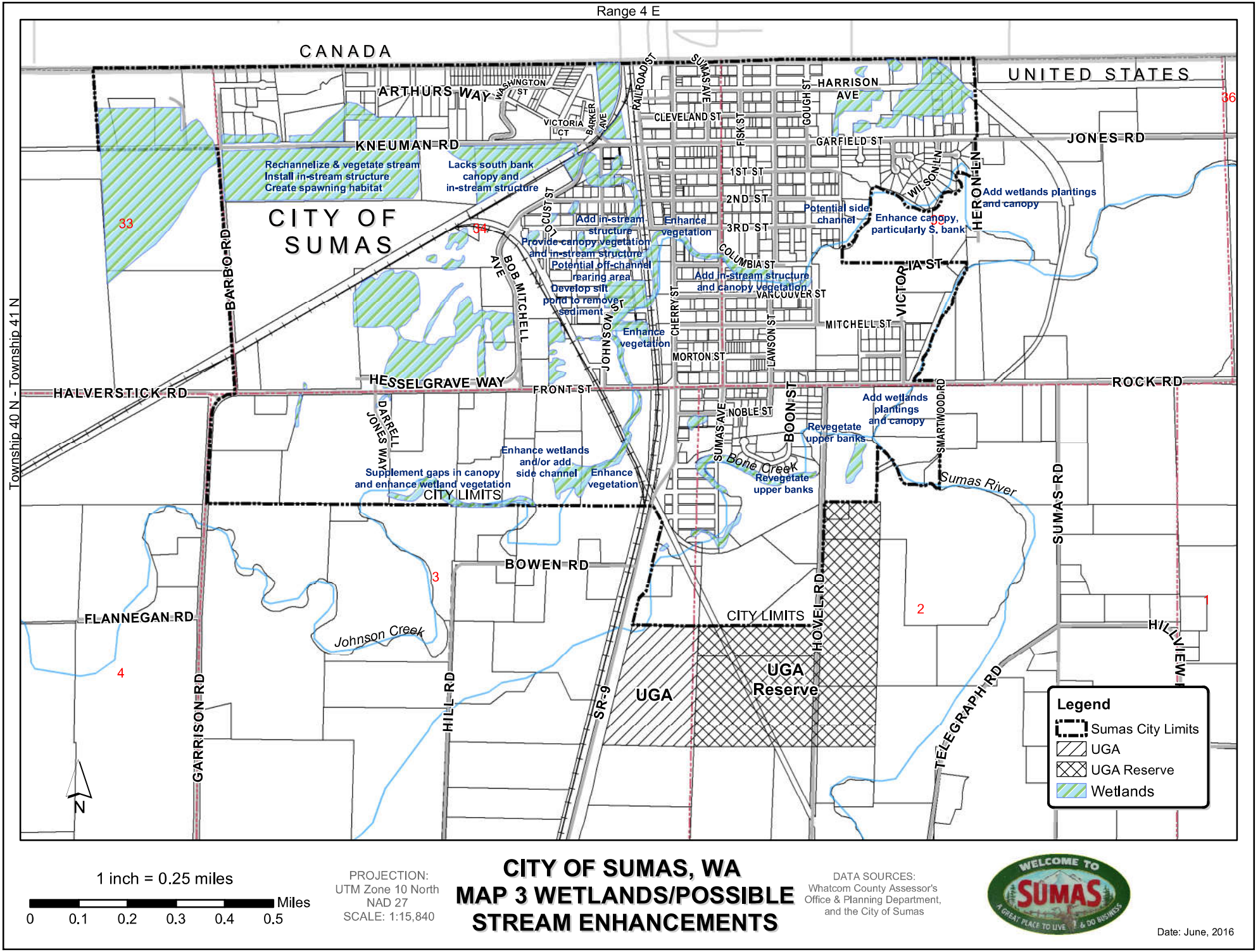
CITY OF SUMAS, WA
MAP 2A
SUMAS - VEDDER MT FAULTS

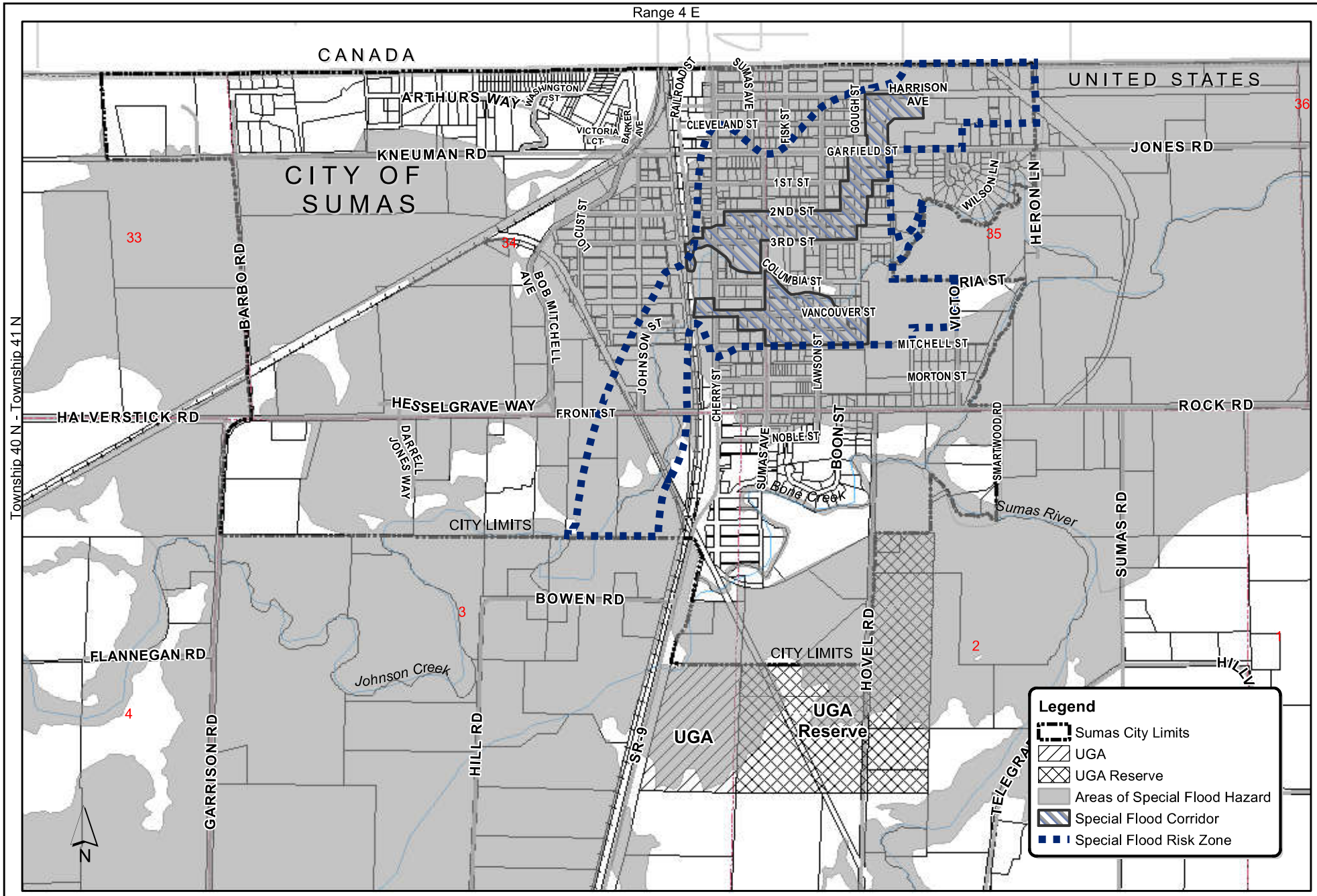
DATA SOURCES:
Whatcom County Assessor's Office & Planning Department, and the City of Sumas

WELCOME TO SUMAS
A GREAT PLACE TO LIVE & DO BUSINESS

Date: June, 2016


Range 4 E
Township 40 N - Township 41 N
CANADA
UNITED STATES
CITY OF SUMAS
LAXTON
ARTHURS WAY
WASHINGTON ST
VICTORIA CT
KNEUMAN RD
PANGBORN
BARBO RD
SUMAS
PUGET
BRISCOT
HALVERSTICK RD
HESSELGRAVE WAY
FRONT ST
DARRELL JONES WAY
ORIDIA
CITY LIMITS
FLANNEGAN RD
GARRISON RD
BOWEN RD
HILL RD
SR-9
UGA
UGA Reserve
HOVEL RD
TELEGRAPH RD
PANGBORN
BOB MITCHELL AVE
JOHNSON ST
LOCUST ST
RAILROAD ST
SUMAS AVE
BARKER AVE
CLEVELAND ST
FISK ST
GOUGH ST
HARRISON AVE
GARFIELD ST
1ST ST
2ND ST
3RD ST
COLUMBIA ST
VANCOUVER ST
CHERRY ST
LAWSON ST
MORTON ST
MITCHELL ST
NOBLE ST
BOON ST
MT. VERNON
VICTOR
I A ST
WILSON LN
HERON LN
BRISCOT
ORIDIA
JONES RD
ROCK RD
SMARTWOOD RD
SUMAS RD
PUGET
Legend
Sumas City Limits
UGA
UGA Reserve
Pangborn Muck
Steep Slopes
15 - 35
> 35
N
1 inch = 0.25 miles
Miles
0 0.1 0.2 0.3 0.4 0.5
PROJECTION:
UTM Zone 10 North
NAD 27
SCALE: 1:15,840
CITY OF SUMAS, WA
MAP 2B
SOILS AND STEEP SLOPES
DATA SOURCES:
Whatcom County Assessor's
Office & Planning Department,
and the City of Sumas
WELCOME TO SUMAS
A GREAT PLACE TO LIVE & DO BUSINESS
Date: June, 2016


Range 4 E
Township 40 N - Township 41 N
CANADA
UNITED STATES
CITY OF SUMAS
ARTHURS WAY
KNEUMAN RD
HALVERSTICK RD
HESSELGRAVE WAY
FRONT ST
ROCK RD
JONES RD
HARRISON AVE
CLEVELAND ST
GARFIELD ST
1ST ST
2ND ST
3RD ST
COLUMBIA ST
VANCOUVER ST
MITCHELL ST
MORTON ST
NOBLE ST
BARBO RD
BOB MITCHELL AVE
JOHNSON ST
CHERRY ST
LAWSON ST
VICTOR ST
HERON LN
WILSON LN
SUMAS AVE
RAILROAD ST
GOUGH ST
FISK ST
BARKER AVE
VICTORIA CT
WASHINGTON ST
CUST ST
BOON ST
SMARTWOOD RD
DARRELL JONES WAY
BOWEN RD
FLANNEGAN RD
GARRISON RD
HILL RD
SR-9
HOVEL RD
TELEGRAPH RD
SUMAS RD
HILLVIEW
CITY LIMITS
UGA
UGA Reserve
Johnson Creek
Bone Creek
Sumas River
Rechannelize & vegetate stream
Install in-stream structure
Create spawning habitat
Lacks south bank canopy and in-stream structure
Add in-stream structure
Provide canopy vegetation and in-stream structure
Potential off-channel rearing area
Develop silt pond to remove sediment
Enhance vegetation
Add in-stream structure and canopy vegetation
Potential side channel
Enhance canopy, particularly S. bank
Add wetlands plantings and canopy
Revegetate upper banks
Enhance wetlands and/or add side channel
Supplement gaps in canopy and enhance wetland vegetation
33
34
36
3
2
1
4
N
Legend
Sumas City Limits
UGA
UGA Reserve
Wetlands
1 inch = 0.25 miles
Miles
0 0.1 0.2 0.3 0.4 0.5
PROJECTION:
UTM Zone 10 North
NAD 27
SCALE: 1:15,840
CITY OF SUMAS, WA
MAP 3 WETLANDS/POSSIBLE STREAM ENHANCEMENTS
DATA SOURCES:
Whatcom County Assessor's Office & Planning Department, and the City of Sumas
WELCOME TO SUMAS
A GREAT PLACE TO LIVE & DO BUSINESS
Date: June, 2016



1 inch = 0.25 miles

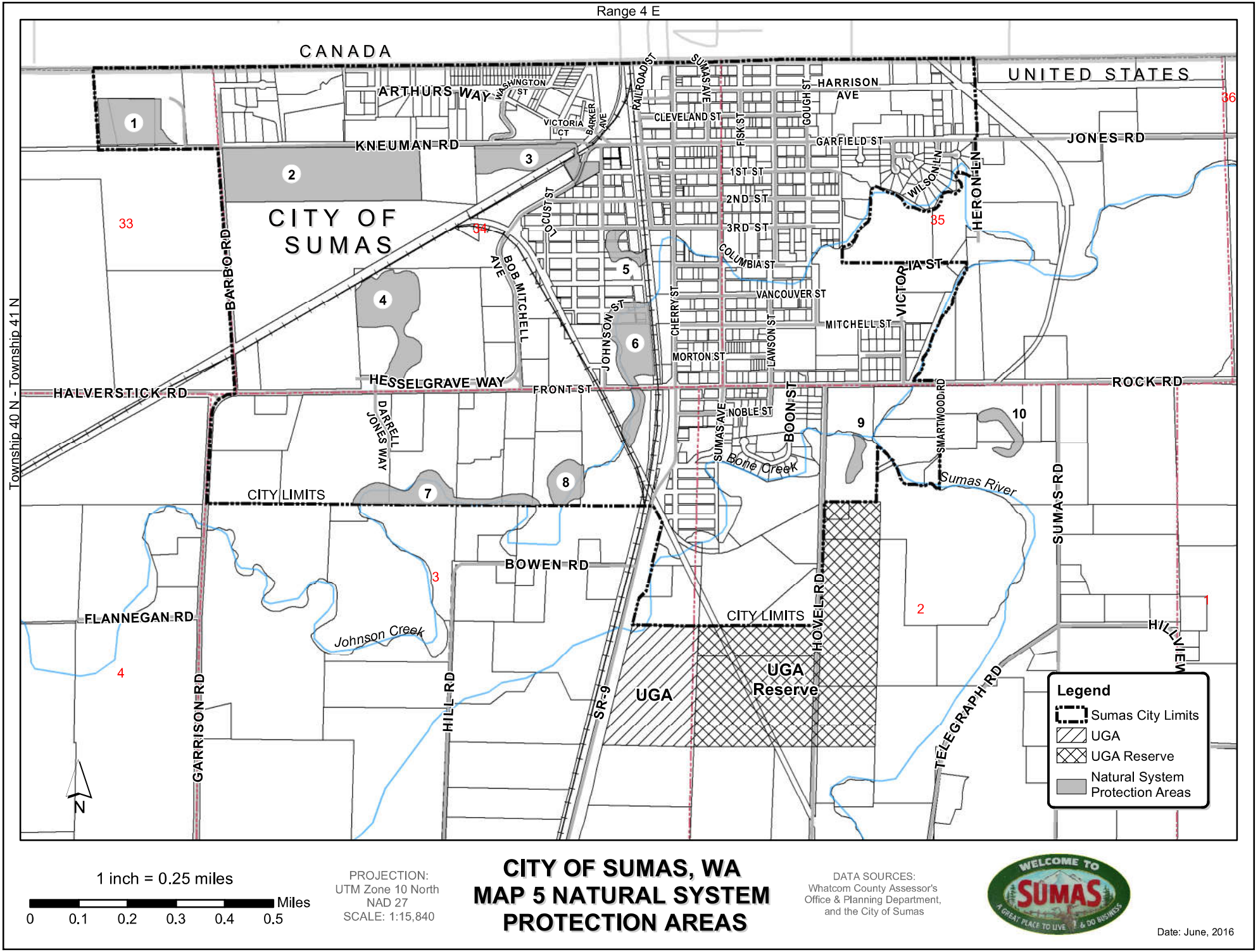
0 0.1 0.2 0.3 0.4 0.5 Miles

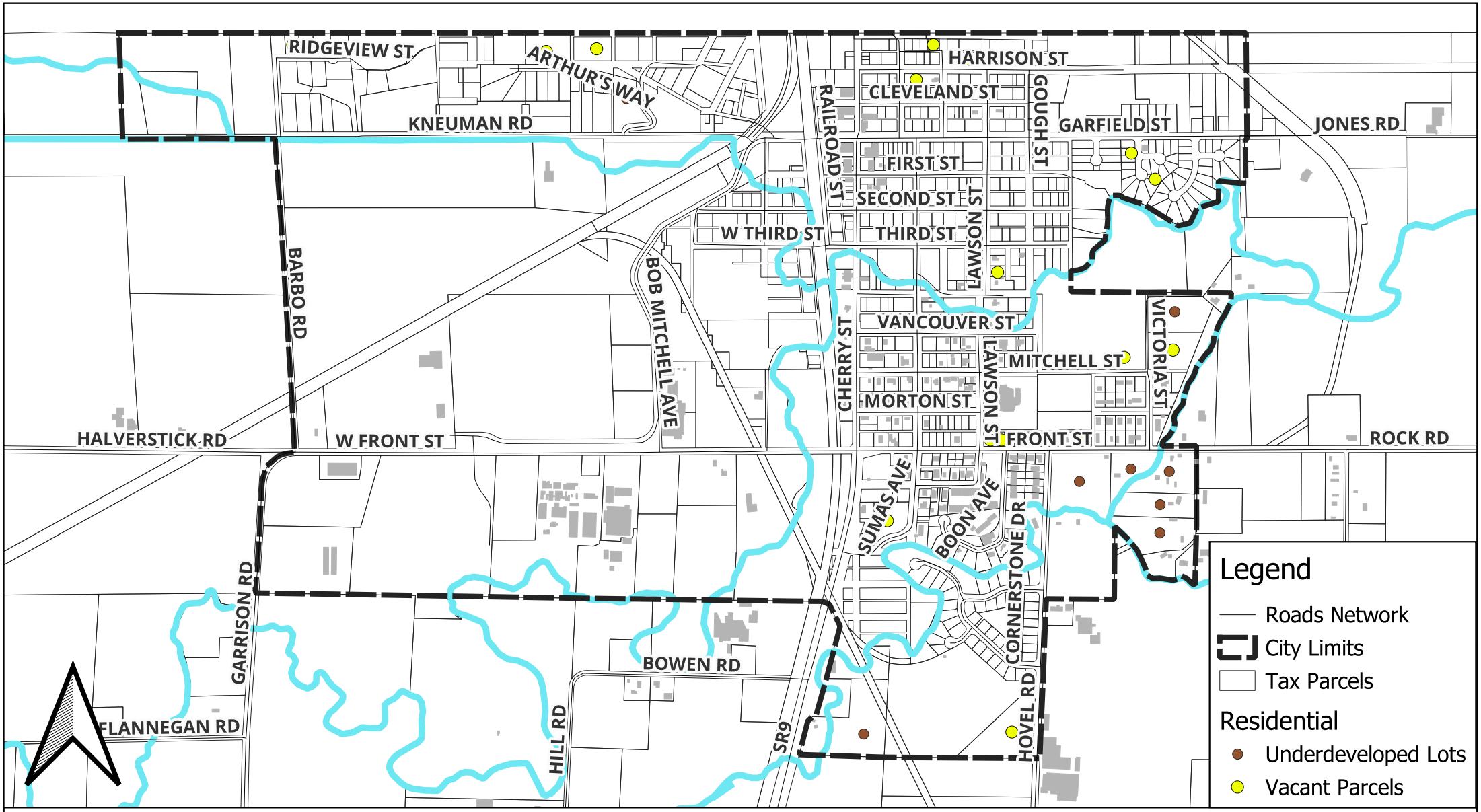
PROJECTION:
UTM Zone 10 North
NAD 27
SCALE: 1:15,840

CITY OF SUMAS, WA
MAP 4
FLOOD ZONES

DATA SOURCES:
Whatcom County Assessor's Office & Planning Department, and the City of Sumas

Date: June, 2016


Range 4 E
Township 40 N - Township 41 N
CANADA
UNITED STATES
CITY OF SUMAS
ARTHURS WAY
KNEUMAN RD
HALVERSTICK RD
HESSELGRAVE WAY
FRONT ST
ROCK RD
JONES RD
BARBO RD
BOB MITCHELL AVE
JOHNSON ST
CHERRY ST
LAWSON ST
VICTOR ST
HERON LN
BOON ST
SUMAS AVE
SUMAS RD
SMARTWOOD RD
RAILROAD ST
CLEVELAND ST
GARFIELD ST
1ST ST
2ND ST
3RD ST
COLUMBIA ST
VANCOUVER ST
MITCHELL ST
MORTON ST
NOBLE ST
HARRISON AVE
GOUGH ST
FISK ST
WILSON LN
DARRELL JONES WAY
CITY LIMITS
BOWEN RD
FLANNEGAN RD
GARRISON RD
HILL RD
SR-9
HOVEL RD
TELEGRAPH RD
HILLVIEW
Bone Creek
Sumas River
Johnson Creek
UGA
UGA Reserve
N
Legend
Sumas City Limits
UGA
UGA Reserve
Natural System Protection Areas
1 inch = 0.25 miles
0 0.1 0.2 0.3 0.4 0.5 Miles
PROJECTION:
UTM Zone 10 North
NAD 27
SCALE: 1:15,840
CITY OF SUMAS, WA
MAP 5 NATURAL SYSTEM PROTECTION AREAS
DATA SOURCES:
Whatcom County Assessor's Office & Planning Department, and the City of Sumas
WELCOME TO SUMAS
A GREAT PLACE TO LIVE & DO BUSINESS
Date: June, 2016

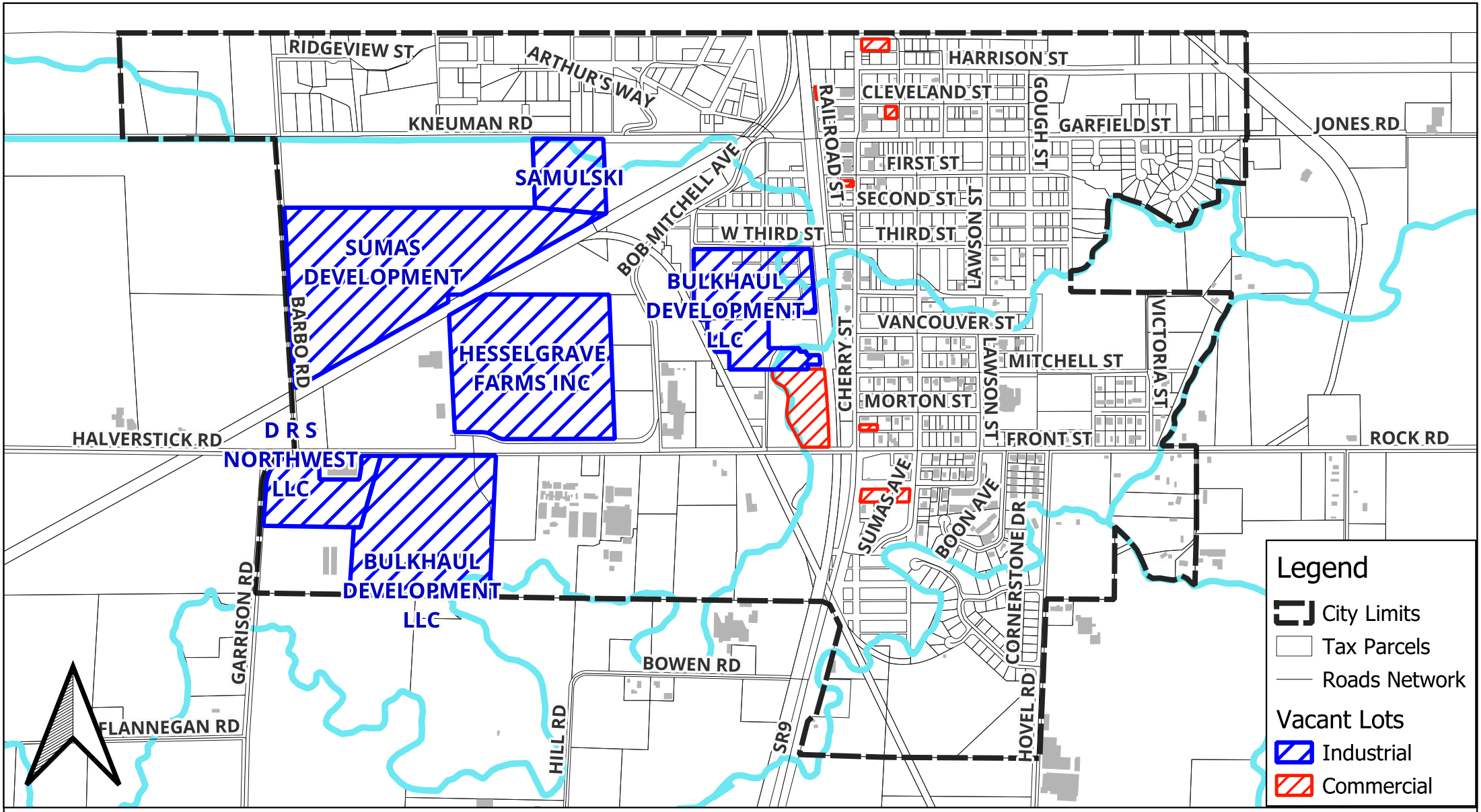


City of Sumas, WA
Figure 6A - Infill Potential Residential

Projection:
UTM Zone 10 North
NAD 27
Scale: 1:20,000

Data Sources:
Whatcom County
Assessor's Office &
Planning Department and
the City of Sumas

CITY OF SUMAS
A GREAT PLACE TO LIVE AND DO BUSINESS

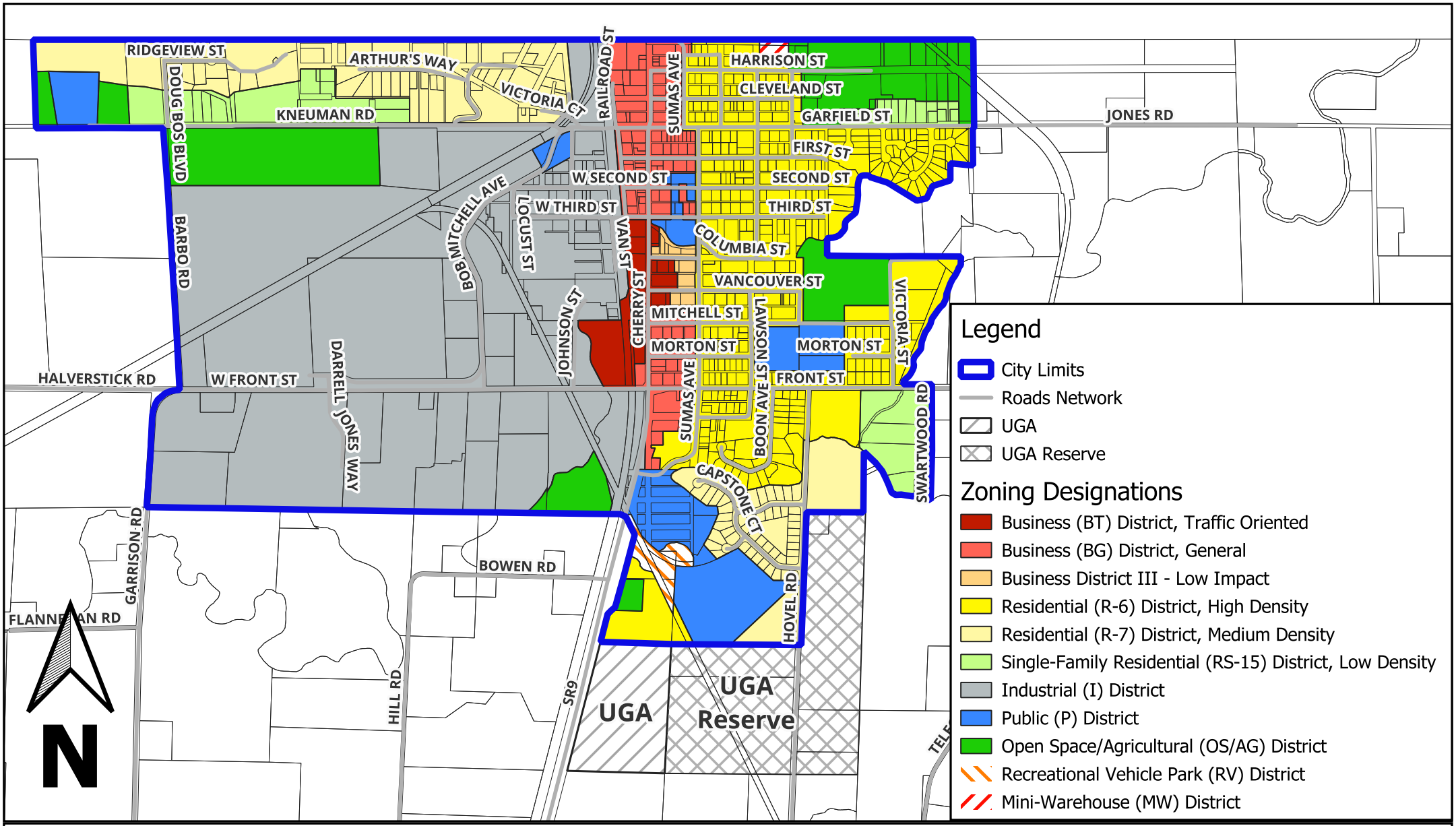


City of Sumas, WA
Figure 6B - Infill Potential Industrial & Commercial

Projection:
UTM Zone 10 North
NAD 27
Scale: 1:20,000

Data Sources:
Whatcom County Assessor's Office & Planning Department and the City of Sumas

CITY OF SUMAS
A GREAT PLACE TO LIVE AND DO BUSINESS



0 1,000 2,000 ft

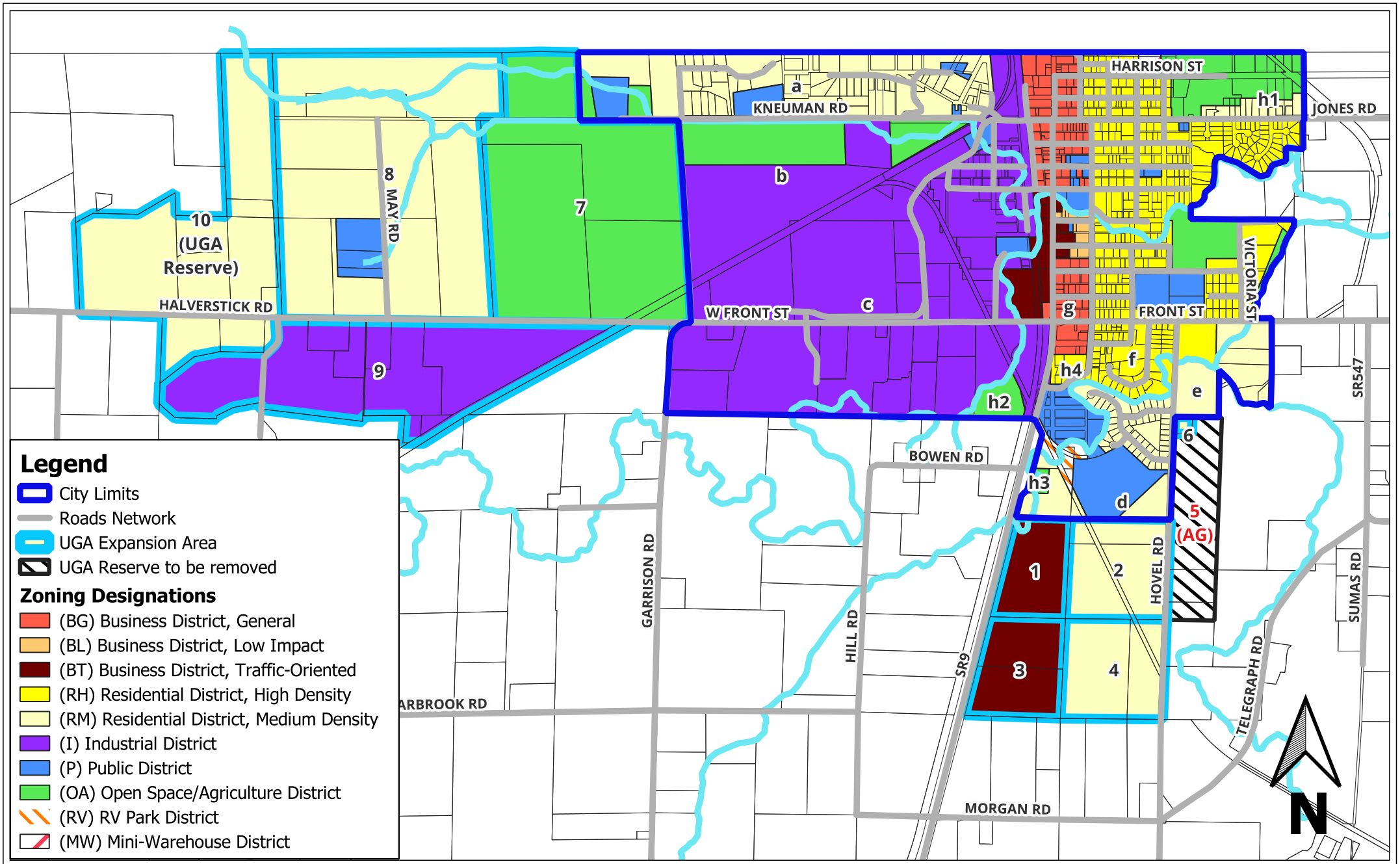
PROJECTION:
UTM Zone 10 North
NAD 27
SCALE: 1:24,000

City of Sumas, WA
Map 7
Current Zoning

DATA SOURCES:
Whatcom County Assessor's Office & Planning Department and the City of Sumas

CITY OF SUMAS
A GREAT PLACE TO LIVE AND DO BUSINESS

Date: August 11, 2025



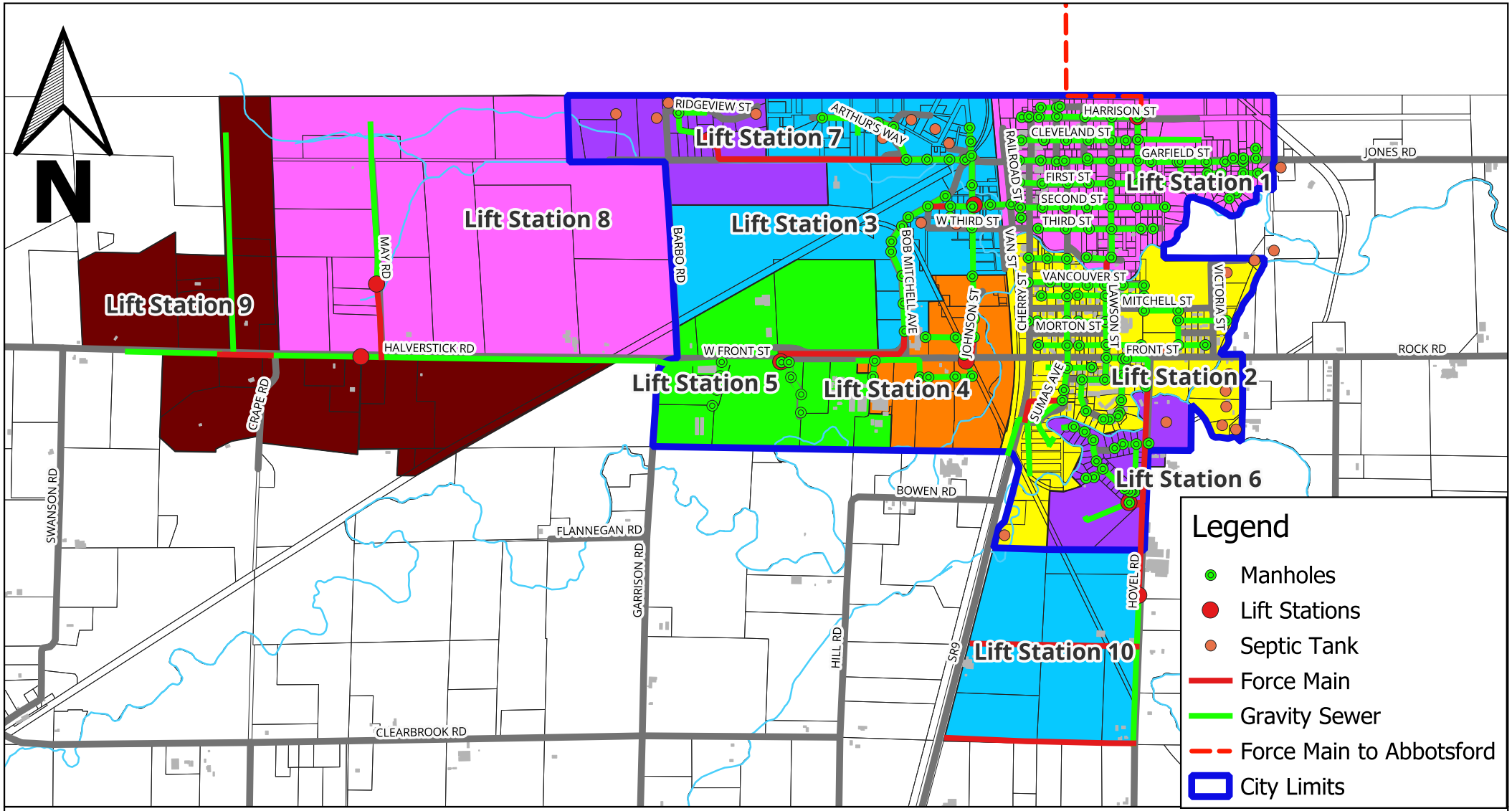
PROJECTION:
UTM Zone 10 North
NAD 27
1:30,000

CITY OF SUMAS, WA
MAP 8
FUTURE ZONING

DATA SOURCES:
Whatcom County Assesor's Office & Planning Department, and the City of Sumas

CITY OF SUMAS
A GREAT PLACE TO LIVE AND DO BUSINESS

Date: August 27, 2025

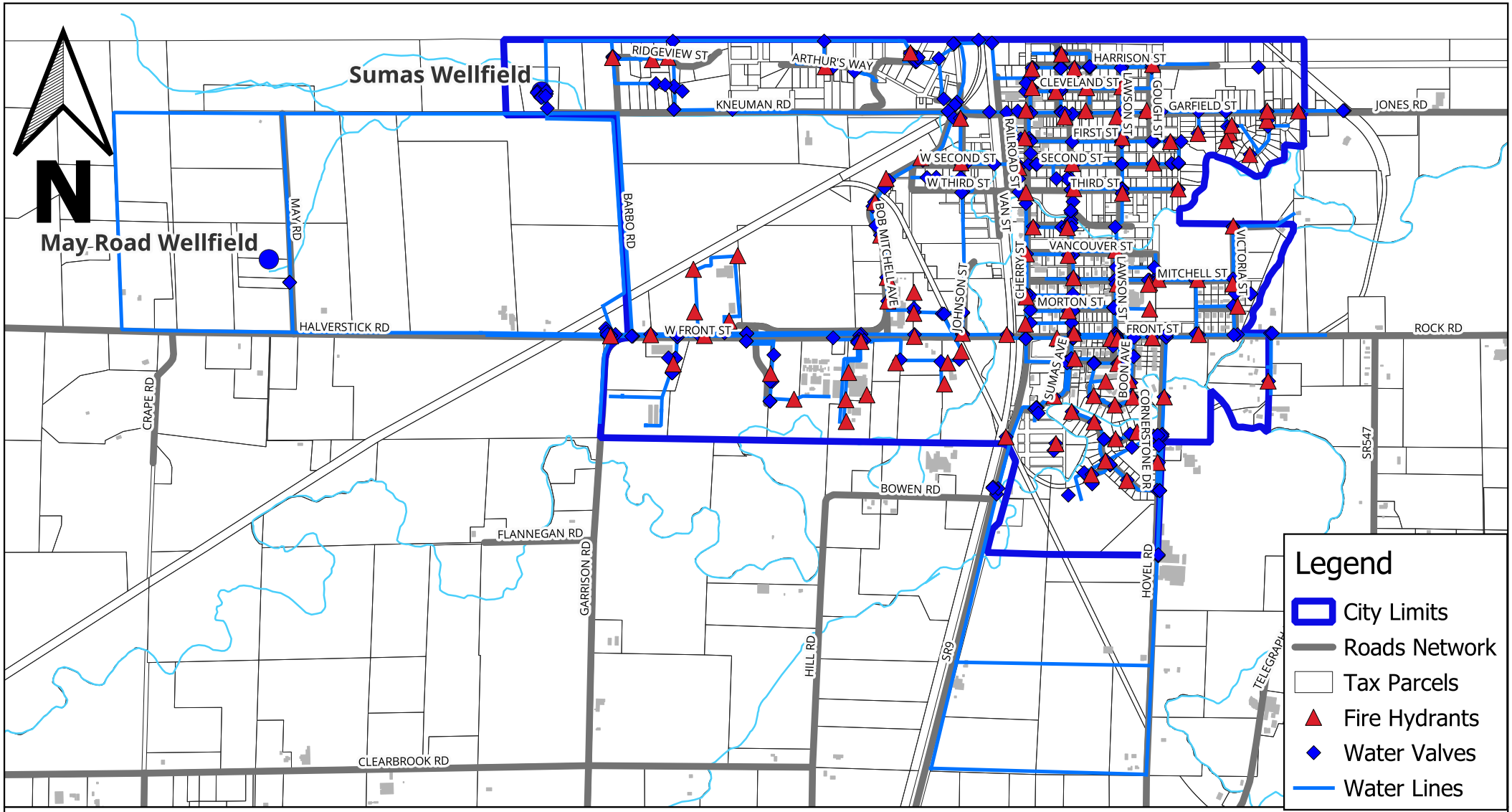


City of Sumas Map 9 Sanitary Sewer System

PROJECTION:
UTM Zone 10 North
NAD 27
SCALE: 1:34,000

DATA SOURCES:
Whatcom County Assessor's Office & Planning Department and the City of Sumas

Date: August, 2025



0 1,000 2,000 3,000 ft

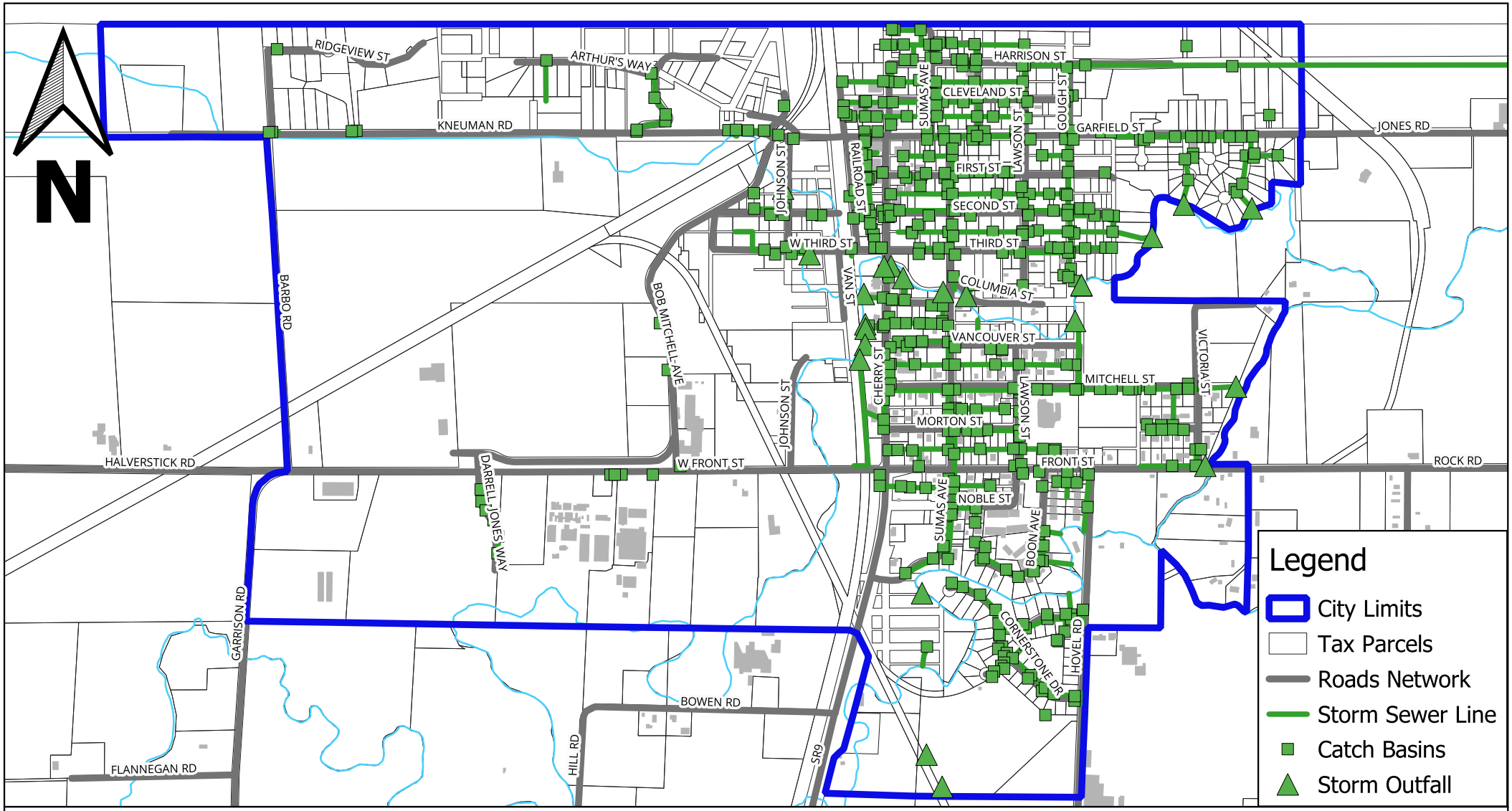
CITY OF SUMAS
A GREAT PLACE TO LIVE AND DO BUSINESS

City of Sumas Map 10 Water System

PROJECTION:
UTM Zone 10 North
NAD 27
SCALE: 1:30,000

DATA SOURCES:
Whatcom County Assessor's Office & Planning Department and the City of Sumas

Date: August, 2025



0 1,000 2,000

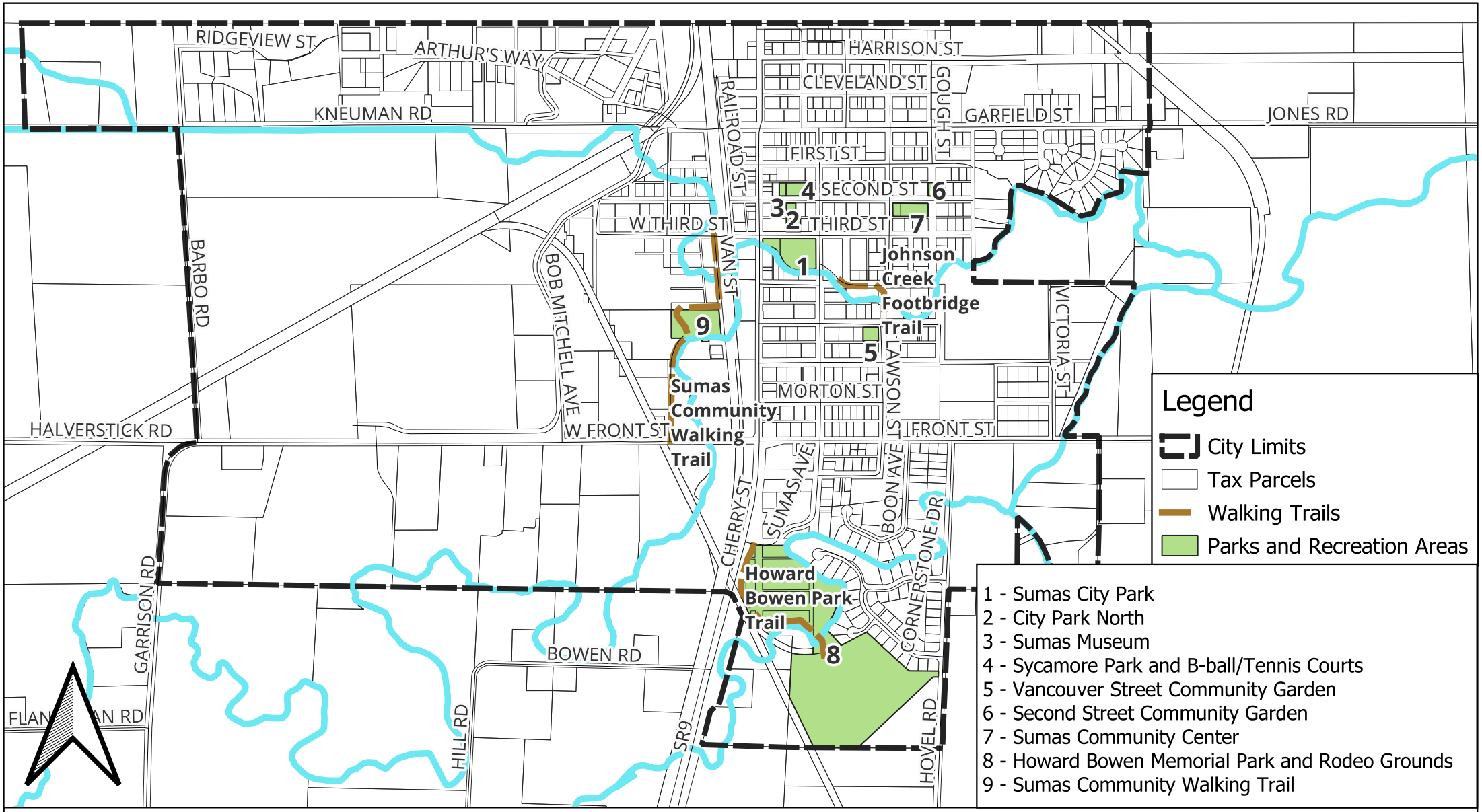
CITY OF SUMAS
A GREAT PLACE TO LIVE AND DO BUSINESS

City of Sumas Map 11 Storm Sewer System

PROJECTION:
UTM Zone 10 North
NAD 27
SCALE: 1:20,000

DATA SOURCES:
Whatcom County Assessor's Office & Planning Department and the City of Sumas

Date: August, 2025

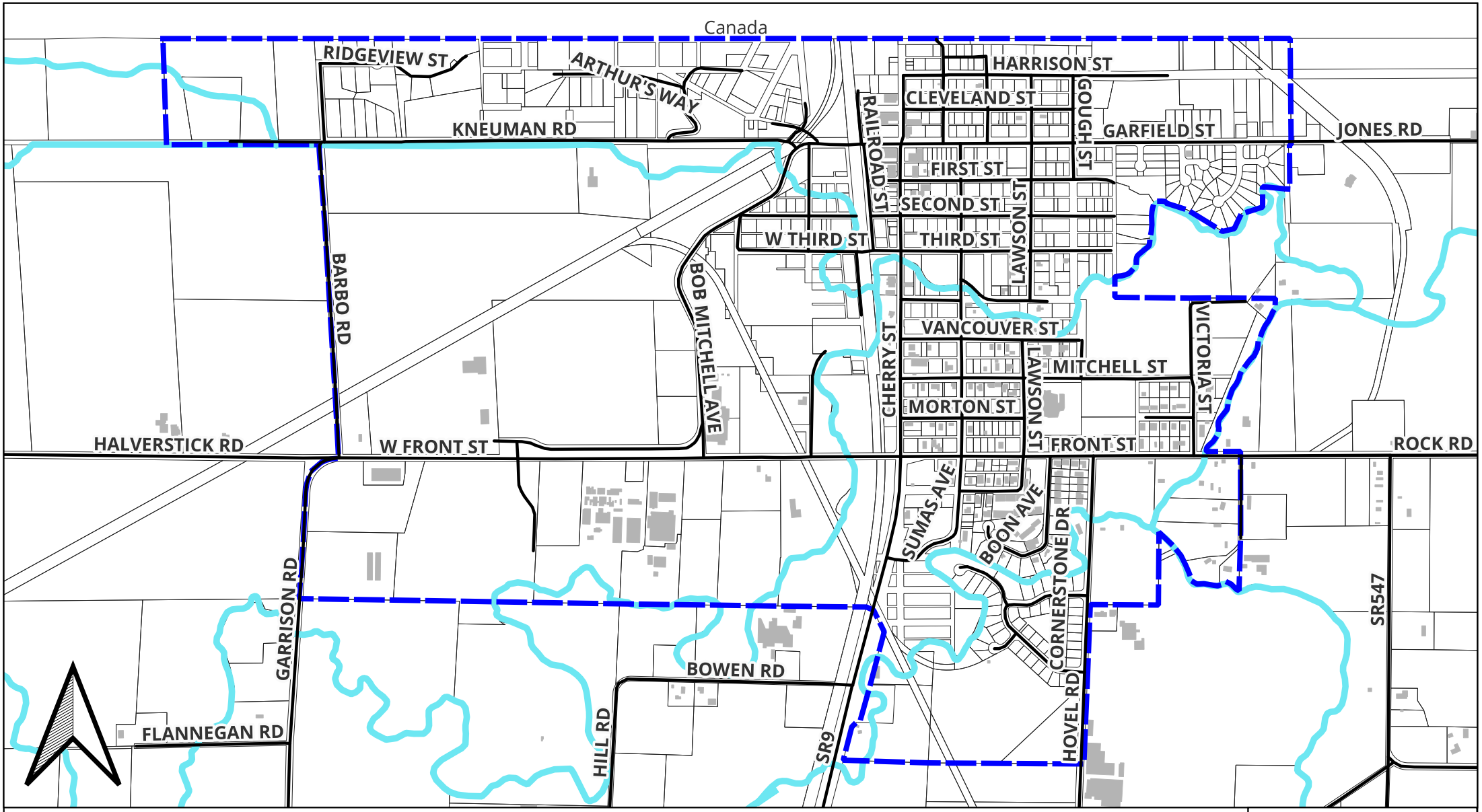


City of Sumas, WA
Map 12 - Parks and Recreation Facilities

Projection:
UTM Zone 10 North
NAD 27
Scale: 1:20,000

Data Sources:
Whatcom County Assessor's Office &
Planning Department and the City of Sumas

CITY OF SUMAS
A GREAT PLACE TO LIVE AND DO BUSINESS

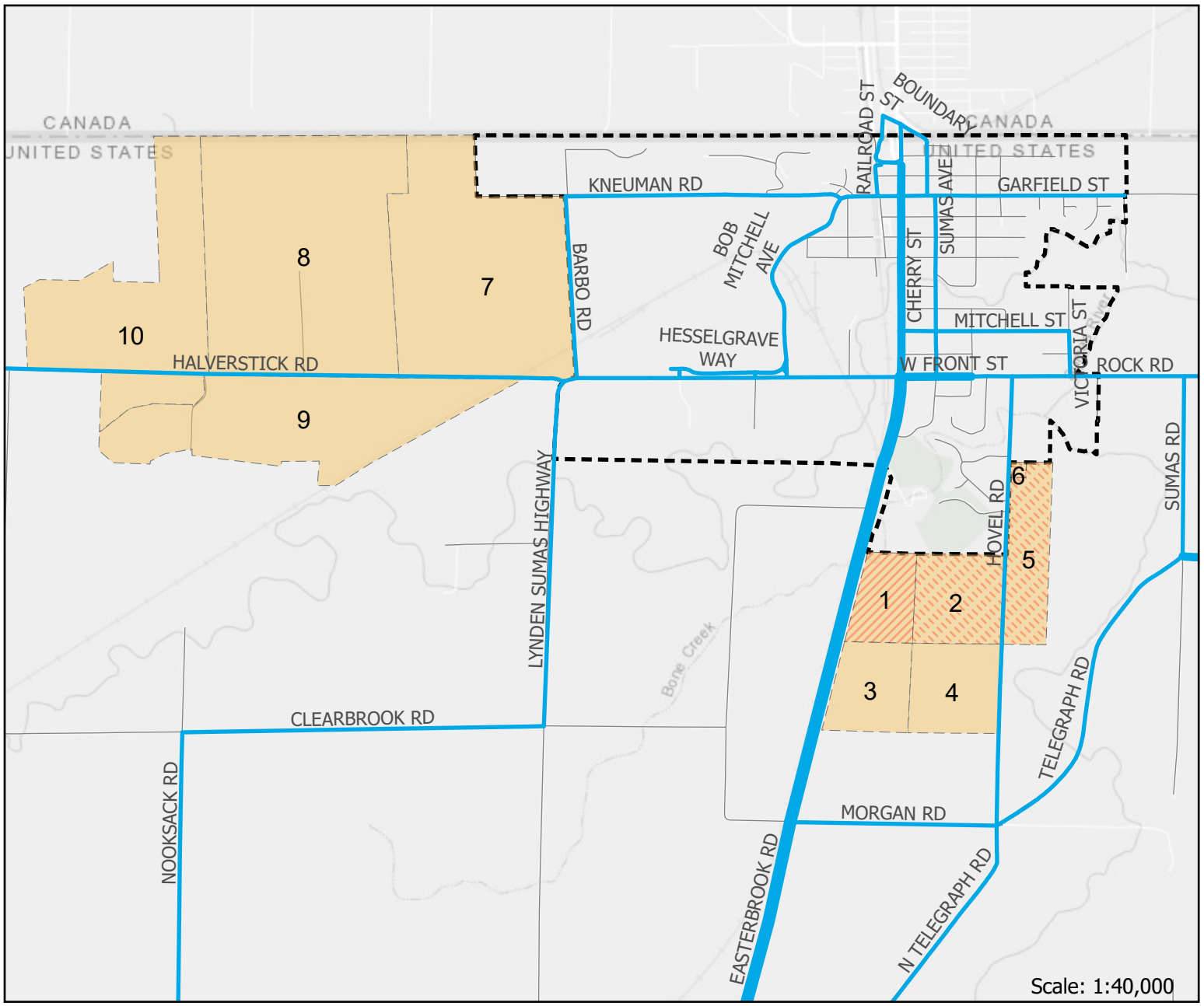


City of Sumas, WA
Figure 6-1
Street System

Projection:
UTM Zone 10 North
NAD 27
Scale: 1:20,000

Data Sources:
Whatcom County
Assessor's Office &
Planning Department and
the City of Sumas

Figure 6-2: Sumas Traffic Volume and Congestion | 2023



2023 PM Peak Volume / Capacity

- A, < 0.5
- B, 0.5 - 0.7
- C, 0.7 - 0.8
- D, 0.8 - 0.9
- E, 0.9 - 1
- F, > 1

2023 Daily Traffic Volume

- < 2,500
- 2,500 - 4,999
- 5,000 - 7,499
- 7,500 - 9,999
- >= 10,000

- City Limits
- UGA
- UGA Reserve
- Other Roads
- Sumas UGA Study Areas, Numbered

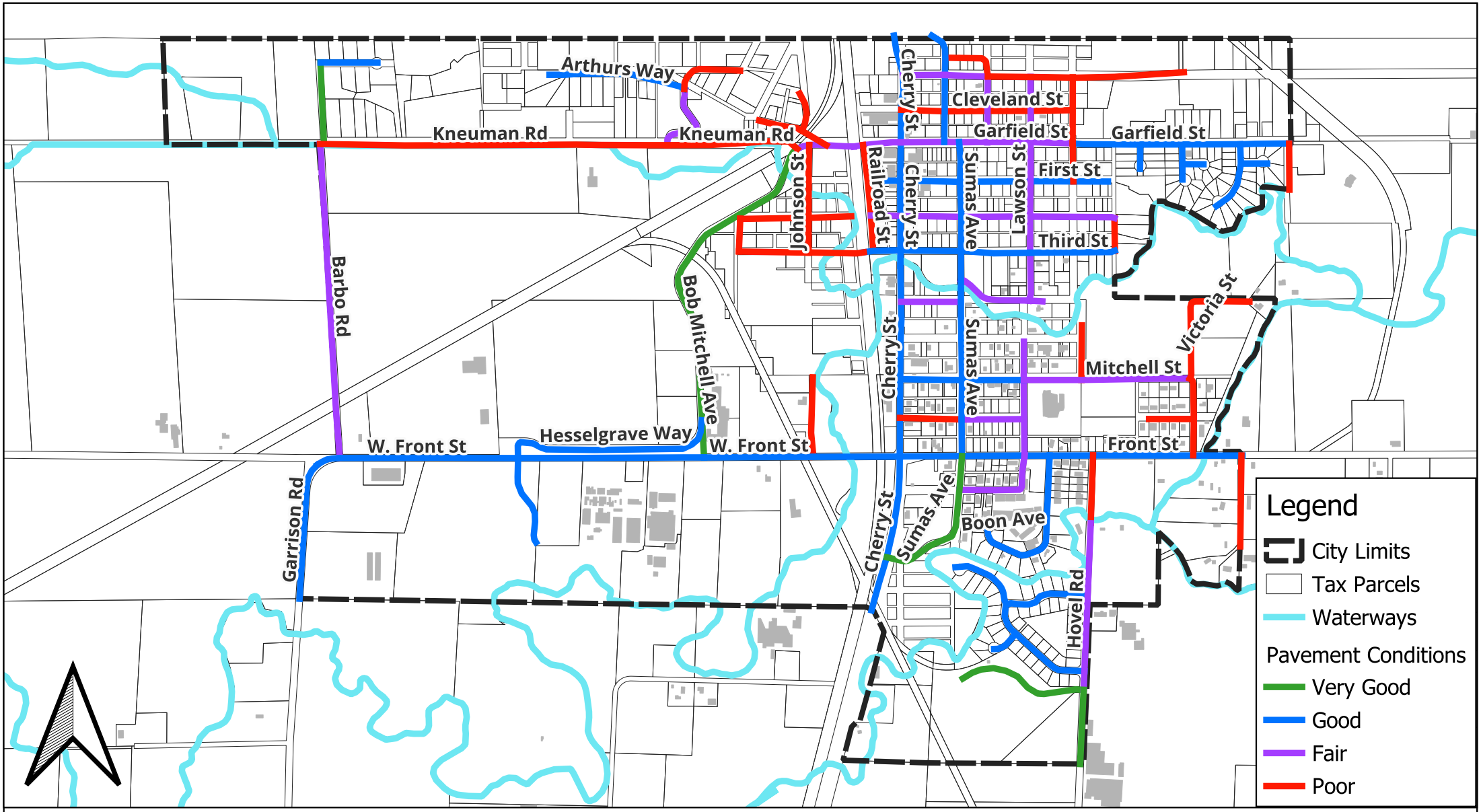
whatcom council of governments

Map authored by the Whatcom Council of Governments, 2025
Data source credits: Whatcom Council of Governments, Whatcom County, City of Bellingham, Washington State Department of Transportation, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA

Please note, this map should be used as a tool. WCOG takes no responsibility for any inaccuracies or misrepresentation of data visualized in this product.

0 0.25 0.5 1 Miles

N W E S

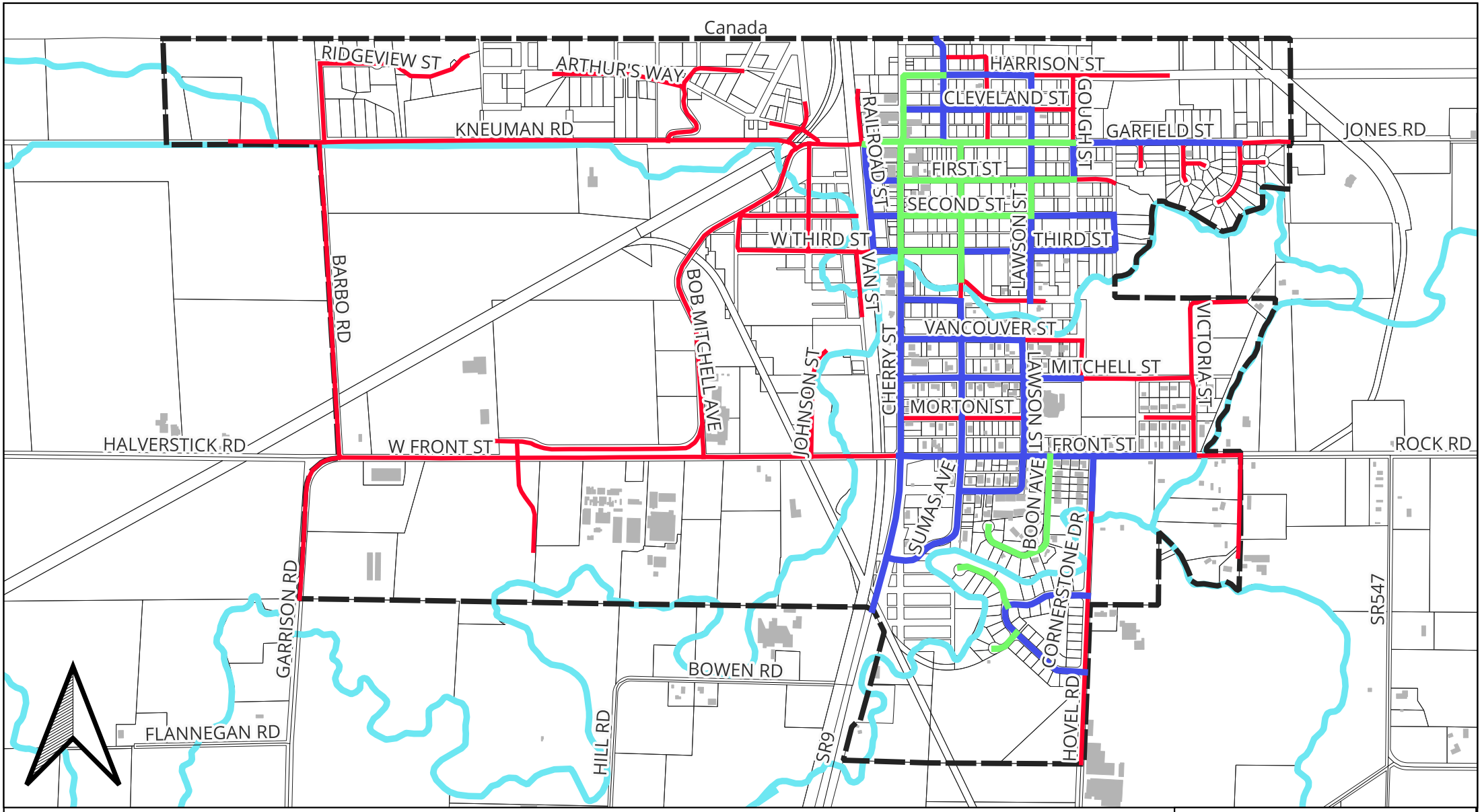


City of Sumas, WA
Figure 6-3
Pavement Conditions

Projection:
UTM Zone 10 North
NAD 27
Scale: 1:20,000

Data Sources:
Whatcom County
Assessor's Office &
Planning Department and
the City of Sumas

CITY OF SUMAS
A GREAT PLACE TO LIVE AND DO BUSINESS

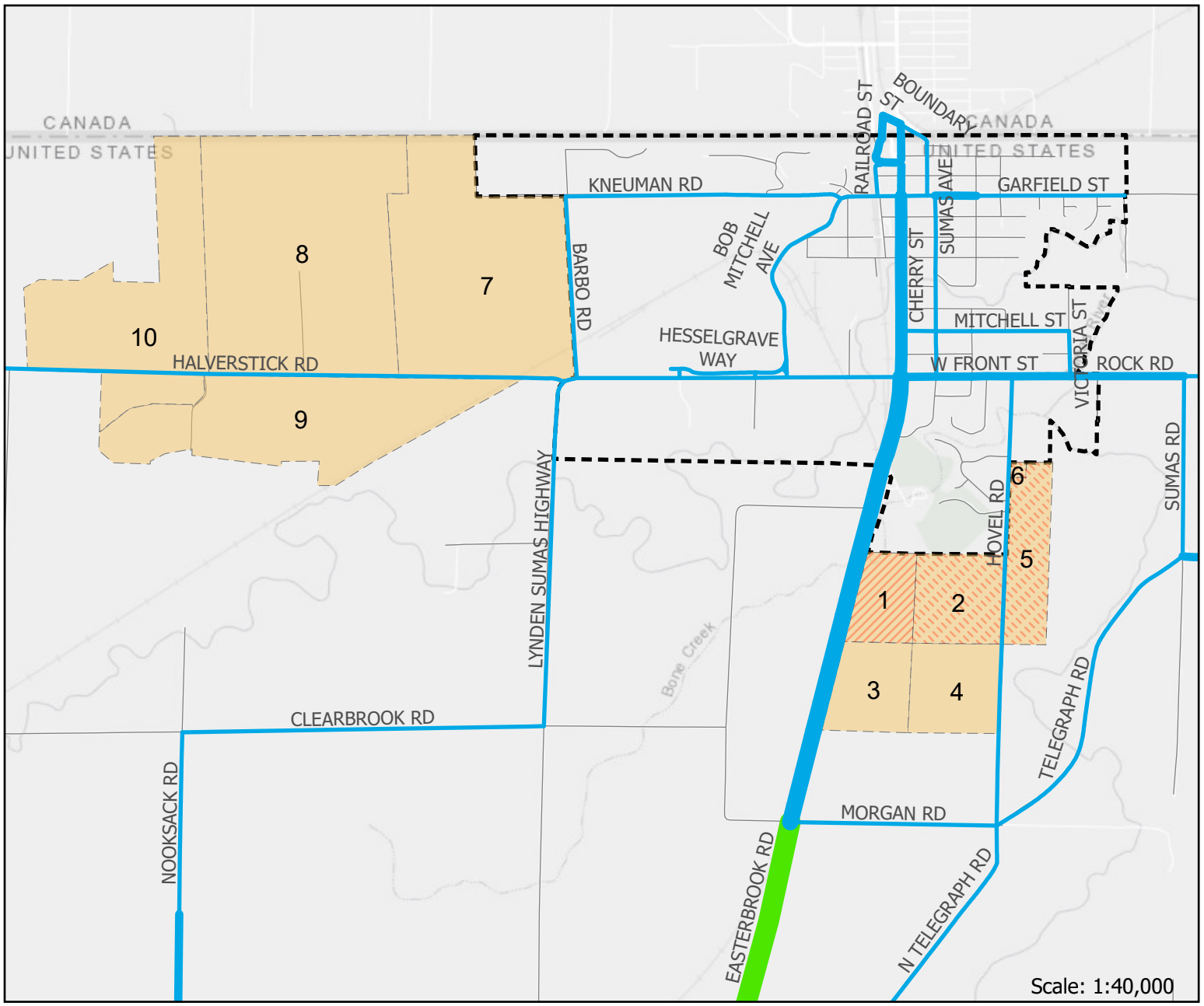


City of Sumas, WA
Figure 6-4
Sidewalk Locations

Projection:
UTM Zone 10 North
NAD 27
Scale: 1:20,000

Data Sources:
Whatcom County
Assessor's Office &
Planning Department and
the City of Sumas

Figure 6-5: Sumas Traffic Volume and Congestion | 2045



2045 PM Peak Volume / Capacity

- A, < 0.5
- B, 0.5 - 0.7
- C, 0.7 - 0.8
- D, 0.8 - 0.9
- E, 0.9 - 1
- F, > 1

2045 Daily Traffic Volume

- < 2,500
- 2,500 - 4,999
- 5,000 - 7,499
- 7,500 - 9,999
- >= 10,000

- City Limits
- UGA
- UGA Reserve
- Other Roads
- Sumas UGA Study Areas, Numbered

whatcom council of governments

Map authored by the Whatcom Council of Governments, 2025
Data source credits: Whatcom Council of Governments, Whatcom County, City of Bellingham, Washington State Department of Transportation, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA

Please note, this map should be used as a tool. WCOG takes no responsibility for any inaccuracies or misrepresentation of data visualized in this product.

0 0.25 0.5 1 Miles

N W E S

Appendix I: Glossary

Agricultural Land: means land primarily devoted to the commercial production of horticultural, viticultural, floricultural, dairy, apiary, vegetable, or animal products or of berries, grain, hay, straw, turf, seed, Christmas trees not subject to the excise tax imposed by RCW 84.33.l00 through 84.33.140, or livestock and that has long-term commercial significance for agricultural production.

Arterial [Minor]: a roadway providing movement along significant corridors of traffic flow. Traffic volumes, speeds and trip lengths are high, although usually not as great as those associated with principal arterials.

Arterial [Principal]: a roadway providing movement along major corridors of traffic flow. Traffic volumes, speeds and trip lengths are high, usually greater than those associated with minor arterials.

Available Capital Facilities: means that facilities or services are in place or that a financial commitment is in place to provide the facilities or services within a specified time. In the case of transportation, the specified time is six years from the time of development.

Capacity: the measure of the ability to provide a level of service on a public facility.

Capital Facility: means a physical structure owned or operated by a government entity which provides or supports a public service.

Capital Improvement: means physical assets constructed or purchased to provide, improve or replace a public facility and which are large scale and high in cost. The cost of a capital improvement is generally non-recurring and may require multi-year financing.

Collector: a roadway providing service which is of relative moderate traffic volume, moderate trip length and moderate operating speed. Collector roads collect and distribute traffic between local roads or arterial roads.

Commercial Uses: activities within land areas which are predominantly connected with the sale, rental and distribution of products, or performance of services.

Comprehensive Plan: means a generalized coordinated land use policy statement of the governing body of a county or city that is adopted pursuant to this chapter.

Concurrency: means that adequate capital facilities are available when the impacts of development occur. This definition includes the two concepts of "adequate capital facilities" and of "available capital facilities" as defined above.

Consistency: means that no feature of a plan or regulation is incompatible with any other feature of a plan or regulation. Consistency is indicative of a capacity for orderly integration or operation

with other elements in a system.

Contiguous Development: means development of areas immediately adjacent to one another.

Critical Areas: include the following areas and ecosystems: (a) Wetlands; (b) areas with a critical recharging effect on aquifers used for potable water; (c) fish and wildlife habitat conservation areas; (d) frequently flooded areas; and (e) geologically hazardous areas.

Density: a measure of the intensity of development, generally expressed in terms of dwelling units per acre. Can also be expressed in terms of population density [i.e., people per acre].

Domestic Water System: means any system providing a supply of potable water for the intended use of a development which is deemed adequate pursuant to RCW 19.27.097.

Financial Commitment: means that sources of public or private funds or combinations thereof have been identified which will be sufficient to finance capital facilities necessary to support development and that there is assurance that such funds will be timely put to that end.

Forest Land: means land primarily useful for growing trees, including Christmas trees subject to the excise tax imposed under RCW 84.33.100 through 84.33.140, for commercial purposes, and that has long-term commercial significance for growing trees commercially.

Geologically Hazardous Areas: means areas that because of their susceptibility to erosion, sliding, earthquake, or other geological events, may not be suited to the siting of commercial, residential, or industrial development consistent with public health or safety concerns.

Growth Management: a method to guide development in order to minimize adverse environmental and fiscal impacts and maximize the health, safety, and welfare benefits to the residents of the community.

Household: a household includes all the persons who occupy a group of rooms or a single room which constitutes a housing unit.

Impact Fee: a fee levied by a local government on new development so that the new development pays its proportionate share of the cost of new or expanded facilities required to service that development.

Industrial Uses: the activities predominantly connected with manufacturing, assembly, processing, or storage of products.

Infrastructure: means those man-made structures which serve the common needs of the population, such as: sewage disposal systems, potable water wells serving a system, solid waste disposal sites or retention areas, stormwater systems, utilities, bridges and roadways.

Intensity: a measure of land uses activity based on density, use, mass, size and impact.

Land Development Regulations: means any controls placed on development or land use activities by a county or city, including, but not limited to, zoning ordinances, subdivision ordinances, rezoning, building construction, sign regulations, binding site plan ordinances or any other regulations controlling the development of land.

Level of Service [LOS]: an indicator of the extent or degree of service provided by, or proposed to be provided by, a facility based on and related to the operational characteristics of the facility. LOS means an established minimum capacity of capital facilities or services provided by capital facilities that must be provided per unit of demand or other appropriate measure of need.

Long-term Commercial Significance: includes the growing capacity, productivity, and soil composition of the land for long-term commercial production, in consideration with the land's proximity to population areas, and the possibility of more intense uses of the land.

Local Road: a roadway providing service which is of relatively low traffic volume, short average trip length or minimal through traffic movements, and high volume land access for abutting property.

Manufactured Housing: conventional housing utilizing premanufactured components.

Minerals: include gravel, sand, and valuable metallic substances.

Mobile Home: a single portable manufactured housing unit, or a combination of two or more such units connected on-site, that is:

a. designed to be used for living, sleeping, sanitation, cooking, and eating purposes by one family only and containing independent kitchen, sanitary, and sleeping facilities;
b. designed so that each housing unit can be transported on its own chassis;
c. placed on a temporary or semi-permanent foundation; and
d. is over thirty-two feet in length and over eight feet in width.

Multi-Family Housing: as used in this plan, multi-family housing is all housing which is designed to accommodate two or more households.

Owner: any person or entity, including a cooperative or a public housing authority [PHA], having the legal rights to sell, lease, or sublease any form of real property.

Planning Period: means the 20 year period following the adoption of a comprehensive plan or such longer period as may have been selected as the initial planning horizon by the planning jurisdiction.

Public Facilities: include streets, roads, highways, sidewalks, street and road lighting systems, traffic signals, domestic water systems, storm and sanitary sewer systems, parks and recreational facilities, and schools.

Public Services: include fire protection and suppression, law enforcement, public health,

education, recreation, environmental protection, and other governmental services.

Regional Transportation Plan: means the transportation plan for the regionally designated transportation system which is produced by the Regional Transportation Planning Organization.

Regional Transportation Planning Organization (RTPO): means the voluntary organization conforming to RCW 47.80.020, consisting of local governments within a region containing one or more counties which have common transportation interests.

Resident Population: means inhabitants counted in the same manner utilized by the US Bureau of the Census, in the category of total population. Resident population does not include seasonal population.

Right-of-way: land in which the state, a county, or a municipality owns the fee simple title or has an easement dedicated or required for a transportation or utility use.

Rural Lands: means all lands which are not within an urban growth area and are not designated as natural resource lands having long term commercial significance for production of agricultural products, timber, or the extraction of minerals.

Sanitary Sewer Systems: means all facilities, including approved on-site disposal facilities, used in the collection, transmission, storage, treatment or discharge of any waterborne waste, whether domestic in origin or a combination of domestic, commercial or industrial waste.

Shall: means a directive or requirement.

Should: means an expectation.

Single-Family Housing: as used in this plan, a single-family unit is a detached housing unit designed for occupancy by not more than one household. This definition does not include mobile homes, which are treated as a separate category.

Solid Waste Handling Facility: means any facility for the transfer or ultimate disposal of solid waste, including land fills and municipal incinerators.

Transportation Facilities: includes capital facilities related to air, water or land transportation.

Transportation Level of Service Standards: mean a measure which describes the operational condition of the travel stream, usually in terms of speed and travel time, freedom to maneuver, traffic interruptions, comfort, convenience and safety.

Transportation System Management (TSM): means low capital expenditures to increase the capacity of the transportation network. TSM strategies include but are not limited to signalization, channelization, and bus turn-outs.

Transportation Demand Management Strategies (TDM): means strategies aimed at changing

travel behavior rather than at expanding the transportation network to meet travel demand. Such strategies can include the promotion of work hour changes, ride-sharing options, parking policies, telecommuting.

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 such land for the production of food, other agricultural products, or fiber, or the extraction of mineral resources. When allowed to spread over wide areas, urban growth typically requires urban governmental services. "Characterized by urban growth" refers to 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.

Urban Growth Area: means those areas designated by a county pursuant to RCW 36.70A.110.

Utilities: means facilities serving the public by means of a network of wires or pipes, and structures ancillary thereto. Included are systems for the delivery of natural gas, electricity, telecommunications services, and water and for the disposal of sewage.

Visioning: means a process of citizen involvement to determine values and ideals for the future of a community and to transform those values and ideals into manageable and feasible community goals.

Wetland: means areas that are inundated or saturated by surface water or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs and similar areas. Wetlands do not include those artificial wetlands intentionally created from non-wetland sites, including, but not limited to, irrigation and drainage ditches, grass-lined swales, canals, detention facilities, wastewater treatment facilities, farm ponds, and landscape amenities. However, wetlands may include those artificial wetlands intentionally created from non-wetland areas created to mitigate conversion of wetlands, if permitted by the county or city.

Zoning: the demarcation of an area by ordinance [text and map] into zones and the establishment of regulations to govern the uses within those zones [commercial, industrial, residential] and the location, bulk, height, shape, and coverage of structures within each zone.

Appendix II: Acronyms

AASHTO	American Association of State Highway Traffic Officials
ADT	Average Daily Traffic
BPA	Bonneville Power Administration
CAO	Critical Areas Ordinance
DEA	David Evans & Associates, Inc.
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
GMA	Growth Management Act
HUD	(United States Department of) Housing and Urban Development
ITS	Intelligent Transportation Systems
LOS	Level of Service
NHMP	Whatcom County Natural Hazards Mitigation Plan
NRCS	United States Department of Agriculture Natural Resource Conservation Service
NWI	National Wetlands Inventory
OFM	Washington State Office of Financial Management
PSE	Puget Sound Energy
PTBA	Public Transportation Benefit Area
RCW	Revised Code of Washington
SCS	United States Department of Agriculture Soil Conservation Service
SEPA	State Environmental Policy Act
SMC	Sumas Municipal Code
SMP	Shoreline Master Program
STP	Surface Transportation Program
TIB	Transportation Improvement Board
TIP	Transportation Improvement Program
UGA	Urban Growth Area
USGS	United States Geological Survey
WAC	Washington Administrative Code
WCOG	Whatcom Council of Governments
WSDOT	Washington State Department of Transportation
WTA	Whatcom Transportation Authority

Appendix III: Community Survey

Unedited text of comments made by respondents:

What aspects of Sumas do you think could use improving?

Overall improvement of curb appeal throughout the City.

Flood mitigation

Sidewalks

New Roads

Become less dependent upon neighboring communities. More flood prevention

Roads, sidewalks. More local businesses

More diverse businesses. Keeping sidewalks clear.

Roads, make more of an effort to make sure people STOP at stop signs and no speeding and make our Sumas park more inviting. Also get the damn flooding fixed!!

Nothing

Business increase such as more eateries and different varieties

More small businesses

CHILDCARE CENTER!

Downtown buildings/ another restaurant

It just looks run down. Home owners need to take more pride in their properties. Some businesses do too.

Hardware/lumber store, more businesses, pedestrian crossing-update/lighting at front and badger intersections

More road lights along roads and sidewalks. And hardware/home and garden spot (chs)

Hovel rd bridge

Activities

Clean up and update storefronts on Cherry st, a fast food restaurant would be nice.

N/A

Fiber optics infrastructure

Sidewalks empty business locations cleaned up

The Canadians blocking the intersections.

Modernization – more than one service provider for different utilities

Better flood prevention

Security

ACCESS TO NEEDS

Filling the empty building or get rid of them. They are a eye sore

Restaurant options, gym

Flood prevention

Noise from industry

More business' and roads

I would love to see more zoning for further business development as well as some road and public works improvement. I know that the 2021 flood did major damage to our infrastructure and that continues to be repaired but we still have a long way to go. I also think that some city ordinances regarding curb appeal would be welcomed. Most residents of Sumas take very good care of there home and property, however many others seem to be growing a junk yard on there front lawn this is quite an eye sore to otherwise lovely neighborhoods.

Help to rebuild after the flood.

More things to do

The obvious – I understand the flood in 2021 was really bad – but needed is businesses – restaurants; bar,brewer,cidery; closed buildings cleaned up. This town has incredible potential. Maybe a dedicated fair/event/festival – yearly or quarterly. Something that brings people in an provides business and future opportunities.

Communication from city hall regarding growth

Not informed enough or familiar enough to answer.

Any business growth is good business growth

Some Cherry Street buildings are derelict

Recreation

Need more business. Looks like 20 buildings will be torn down when CBP will build a new Port at Sumas. If they are building a bigger Port due to not only to replace the old port but also due to traffic coming from Canada has picked up throughout the years. What does Sumas have to offer as for businesses with this traffic coming through. Blaine and Lynden both have got new businesses for their city.

Flood mitigation

Flooding plan

Accessibility to community services such as banking, super market, and improved public transportation

Homes look run down. Yards need to be taken care of. Broken down vehicles parked in yards for extended periods of time. Clear the creeks out.

Light pollution, particularly around the rodeo grounds.

Affordable housing

"Larger" Sumas Days → Again

Cost of living

Housing in our community is not good for seniors, too many steps

Resolution to floods, noise mitigation, no banks

Solving the flooding problem

Streets

Active flood control measures

Flood Control

Some road conditions, and the 'spot-flooding' in winter.

Creek cleaning and dredging

Parking, yards, too many cars everywhere

No more garbage trains

Better flood control

I think clearing snow could be better. After the big snow this winter the Canadian side was cleared promptly, but me and many others were stuck in our cul de sacs for 3+ days. Also, there are a lot of sidewalks in not-great condition, or missing ADA ramps.

More places to shop

More activity throughout the year

More sidewalks, bike lanes, youth center, coffee shop, bookstore, shopping mall, improved bus service, enforcement of by-laws so homeowners maintain trees, garbage removal + maintenance

Walking Trails

Seem to have too many policemen, for city size/needs, given Border Patrol + County, Some roads need re-paving, not keen on tree pollarding

Affordability of Housing

Access to Industrial Elec Rates

Larger/Regional Grocery Store

Flood situation, clean up Cherry & Curb appeal

Neighbors need to keep things clean. Lots of dirty houses that cause rats. Roads, sidewalks, more crosswalks. Would also like to see a youth center. I thought this was the plan already but no word since covid.

Don’t build a new customs building and/or shut down during construction

Dedicated walking trails

Clean River and ditches

Streets especially Fisk st + spur

Downtown.

Good for Now.

Storm water system

Sports (soccer fields)

Rail road crossing on barbo, Noise level enforcement of industrial

businesses after 10pm

Growth & home maintenance requirements

Fixing the flooding problem Stop hauling load and load of gravel in

Need more parks/playgrounds on North end of town

Landscaping and we need more businesses + variety store with hardware supplies.

Commercial Business Development and Street Improvements

Sumas pride, get rid of junk on yards and now on the streets, vehicle parked indefinitely, Cherry street clean up from weeds, vacant lots unkept

Quality of life, community events and resources

The city of Sumas needs to stop acting like an HOA. The past notice of legal action for slow post-flood cleanup deserves a response. You do notice the City never mows by the bridge & notice the high weeds at the City yard. Relax with the rules! Certain people were targeted while others still haven't cleaned up – What gives?

Closed stores + Some home's yards cleaned up!!

Less industrial noise + pollution

Better upkeep on roads, sidewalks, store fronts, ditches + cleanliness. Dedicated walk trail

What do you think should be the City of Sumas' top priority for the next 20 years? Why?

Ensuring homes won't flood again

Resilience and independence

Infrastructure and community to sustain the future growth and stability of the generations

Cleaning up all the houses that haven't been touched since the flood

Flood prevention so people won't be afraid to stay or invest in the city

Attracting more businesses to our community so we can stay local for our needs

Flood management.

Flooding since we have been waiting for a fix since 1990!! >:(

Nothing

Figure out how to serve the people who live in Sumas opening more businesses that are competitive with Lynden to build the revenue from the home town. Will all the packaging places we are servicing our neighbors to the north more than our own people.

Family friendly activities

CHILDCARE Center-feel free to give Carrie (Adams) Turnberg a call, as this is her hometown and would love to own a center

Fixing up downtown

Getting sidewalks updated and down every street! There needs to be sidewalks from hovel housing into town.

Flood mitigation/water dispersement. Residential and commercial growth

More businesses, hardware store, fast food

Making sure residents can get their basic needs without having to go to Lynden or Bellingham

Expansion and continuing to grow

Flood control and affordable preparation for flooding or post flood survival

Na

Beautify downtown Cherry Street to better depict smalltown America. I say this because when I tell people I have moved to Sumas, many of them are calling it dumpy. I disagree with this, however, they are basing their judgement on the only street they drive, which is Cherry Street.

Building more businesses and more flood management

Clean out the nooksack river there is absolutely no reason we should worry about flood water

Preventing floods. It is over 2 years and a lot of folks are

still not back in their homes

Flood prevention – don't want to be in constant stress when it rains too much

Preventing flooding

Growth

ACCESS TO NECESSITIES/GROCERY/HOUSEHOLD ITEMS/FAST FOOD

Fixing flood issues, I have lost to much in 2 different floodings.

New businesses – homes are being built and lots of new families are moving into the area. Creates more job opportunities. Lots of traffic through town with the border, could provide good options as people are passing through. We have to rely on Nooksack, Lynden, Bham for many of the amenities would be nice to have some of these options within Sumas city limits

Flood prevention because it is a high risk every year and nothing major has been done about it

Preparation for wildfires, chances of extreme heat in summers is increasing

Better plan for flooding

Prioritizing public works such as maintaining and improving our roads as well as other public spaces would go a long way towards enticing people to move and/or visit Sumas.

Childcare/preschool facility. Community Center.

Grow as a community Flood control

Growing the town – getting 'on the map' for a festival or event of some sort.

Infrastructure to accommodate growth as it happens

Good security and quality family atmosphere

Expanding businesses

Make the main street look nicer

Flood management, nature trails

A little bit more businesses. Not gas stations or shipping places we have enough of that.

Building a City that is flood resilient for the citizens want to stay – less risk

Clean up creeks and rivers

Flood prevention strategy

Get a sidewalk & bridge in and fix Hovel Rd

Public sidewalk on Hovel road to connect the new housing development to the town and fixing the bridge on Hovel that was damaged in the last flood.

Affordable housing. Prices have gone up so much in our area. People are needing to move out of the area to find affordable living. The city also needs to put pressure on the county to make improvements to the Nooksack river to prevent future flooding.

Fix the flood problem

No answer

Resolution to the floods

To give solution to the floods, to have a family stability and thus make Sumas a prosperous place. Stop building so many apartments

Active flood control measures

Flood Control – The 2021 Flood

Flood Preparedness

Flood management. After 3 days of rain, my property will be ok, but my neighbor has a lake in front of door, <:(

Flood control, it is Sumas biggest negative about living here and people wanting to come besides low income

Clean up the whole town

Less taxes/less smelly train garbage

Flood Control

Get army corps to allow gravel removal from the river. Draw businesses that residents can afford. Streets and sidewalks. Be people friendly.

Dredging the rivers/creeks to help with flooding.

Preserving the small town nature of this community, but also becoming more accessible. Proper curb ramps, cross walks with flashing lights, especially on Garfield and Cherry. Dr. office, dentist, and legitimate grocery store. It seems there are a lot of retirement age people here that would greatly benefit from the reduced necessity of travel from having those basic amenities in town.

Small town feel but with more amenities

Roads and safety plans

Cheaper Housing

Reducing of industrial pollution in the air and soil. And build up banks of the river to prevent future flooding of homes + businesses

Limit new builds to ensure we keep that small town feel.

Maintain as much independence as possible from federal, state, and county governments

Managed growth

Flood Control

Maintaining municipal controlled utilities

Flood situation, clean up

More amenities

Road fixes, building a youth center, Both of these will lead to safer city. & investing in our youth is NEVER a bad idea.

Flood situation

Dr + dentist

Get Rivers and Ditches cleaned out.

Our street is often blocked by trucks

Flood Prevention

More restaurant or fast food

Careful planning for more housing developments which will bring people who can support new businesses in the downtown area.

Increasing home values to keep trend with Whatcom Co.

Flood mitigation; threatens properties and livelihoods

After school programs/places for kids to go. Lots of families could benefit. More families moving to Sumas.

Growth in amenities to self sustain

Industrial growth while maintaining small town vibe

Flood Control

Stop taking foreign garbage. Direct water away from Sumas that heads our way, when it thaws. Maybe build aqueducts going back to sea or SE.

Flood mitigation – 11/15/2021 ruined lives. Widen Rock Rd. Sumas river bridge for pedestrians

Mainstreet Business Development and Flood protection

Continue to get housing development accomplished, get a reader board, get waterways cleaned up – look horrible, because of flood potential, continue to develop safe businesses in the City.

Affordable housing and creating livable wage jobs. I believe this will create a strong community

Flood Control

Flood control

Safe environment, for health for us and children/grandchildren

Just clean up/update the main street so that it doesn't look so old and unkept.

Appendix IV: SEPA Documents

Determination of Nonsignificance

Description of proposal: Proposed 2025 update to the City of Sumas Comprehensive Land Use Plan pursuant to Section 36.70A.130 of the Revised Code of Washington (RCW), as well as proposed amendments to Titles 14, 15, and 20 of the Sumas Municipal Code (SMC).

Proponent: City of Sumas

Location of proposal: Within the City limits of the City of Sumas.

Lead agency: City of Sumas, WA

The lead agency for this non-project proposal has determined that it does not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

This DNS is issued under WAC 197-11-340(2). The lead agency will not act on this proposal for a period of fourteen days from the date of issuance of this determination. Comments must be received by December 4, 2025.

There is no local agency appeal of this determination.

Responsible official: Bruce Bosch

Position/title: Mayor

Address: 433 Cherry Street, PO Box 9, Sumas, WA 98295

Phone: (360) 988-5711

Date of issue: November 20, 2025

Signature

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization, or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. **You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown.** You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to **all parts of your proposal,** even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for lead agencies

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B, plus the Supplemental Sheet for Nonproject Actions (Part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in "Part B: Environmental Elements" that do not contribute meaningfully to the analysis of the proposal.

A. Background Find help answering background questions

1. **Name of proposed project, if applicable:**

   2025 Update to the Sumas Comprehensive Land Use Plan

2. **Name of applicant:**

   City of Sumas

3. **Address and phone number of applicant and contact person:**

   City of Sumas (360) 988-5711

   PO Box 9

   Sumas, WA 98295

   Contact: Carson Cortez, City Planner, ccortez@cityofsumas.com

4. **Date checklist prepared:**

   November 19, 2025

5. **Agency requesting checklist:**

   City of Sumas

6. **Proposed timing or schedule (including phasing, if applicable):**

   Public hearing before the City Council scheduled to close on December 22, 2025

7. **Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.**

   Amendments to Titles 14, 15, and 20 of the Sumas Municipal Code (SMC), including amendments the City's Floodplain Development Ordinance, Critical Areas Ordinance, and Development Regulations.

8. **List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.**

   EIS for City of Sumas Floodplain Management Plan, 1997.

   Fish Habitat Reconnaissance Assessment for City of Sumas, David Evans & Associates, 1998.

   Wetlands Inventory for the City of Sumas, David Evans & Associates, 1992.

   Flood Insurance Study and Flood Insurance Rate Map prepared by the Federal Emergency Management Agency with an effective date of January 18, 2018.

9. **Do you know whether applications are pending for governmental approvals of other**

proposals directly affecting the property covered by your proposal? If yes, explain.

None

10. **List any government approvals or permits that will be needed for your proposal, if known.**

    Adoption by ordinance of Sumas City Council.

11. **Give a brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)**

    Adoption of the 2025 update to the Sumas Comprehensive Land Use Plan and associated Development Regulations as required by the Growth Management Act (GMA) pursuant to RCW 36.70.130.

12. **Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.**

    The proposal applies to land within the City of Sumas, Washington.

B. Environmental Elements

1. Earth Find help answering earth questions

a. General description of the site:

Circle or highlight one: Flat, rolling, hilly, steep slopes, mountainous, other:

Predominantly flat with a hill and ridge in the NW corner of town.

b. What is the steepest slope on the site (approximate percent slope)?

About 30 percent, associated with the hill. The portion of town within the downtown commercial area is flat with almost no slope at all.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them, and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

Predominantly silt loams in the floodplains of Johnson Creek and Sumas River (Briscot silt loam; Puget silt loam; Sumas silt loam; Urban land-Whatcom-Labounty complex). A large amount of the land surrounding Sumas is classified as 'prime farmland'. Most of the soil is classified as Category III, 'prime when protected from flooding'.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

Low strength, mucky soils exist in the west end of town. Buildings in certain areas have subsided. Road cuts on the slope of the hill have also been subject to slides.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

Not applicable.

f. Could erosion occur because of clearing, construction, or use? If so, generally describe.

Not as a direct result of this proposal. Erosion may be associated with urban development allowed by City development regulations. Construction of roads, utilities, and buildings creates associated clearing and grading, which can result in erosion.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

The proposal will not result in any impervious surfaces.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any.

Sumas has adopted stormwater regulations applicable to the construction and operation phases of development. These guidelines mitigate the impact of erosion. Concentration of development in a compact urban area is expected to minimize the overall extent of erosion experience in rural Whatcom County as a whole.

2. Air Find help answering air questions

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

Not as a direct result of this proposal. However, emissions are generally expected to increase as population and development increase.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

The area within the City is subject to odors associated with surrounding agricultural and industrial activities. Air quality is also affected by emissions generated in the more densely populated areas to the northwest, in British Columbia, Canada.

c. Proposed measures to reduce or control emissions or other impacts to air, if any.

None associated with the proposal. The affected area is within jurisdiction of Northwest Clean Air Agency, and major individual projects would be subject to review.

3. Water Find help answering water questions

a. Surface Water: Find help answering surface water questions

1. Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

Sumas Creek flows from the west to meet Johnson Creek in the western part of the city. Johnson Creek flows directly through the city into the Sumas River. The Sumas River is located to the east of current city limits and flows north, over the border, and empties into the Fraser River in Canada. There are numerous wetlands in the planning area, many of which are associated with the streams or are within the 100-year floodplain.

2. Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

Not as a direct result of this proposal. It is expected that some development allowed pursuant to City regulations will occur within 200 feet of streams and wetlands.

3. Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

Not applicable.

4. Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known.

No.

5. Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

Most of the Sumas area is either within the 100-year or 500-year floodplain. Flooding is a problem inside the current city limits.

6. Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

Not applicable.

b. Ground Water: Find help answering ground water questions

1. Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give a general description, purpose, and approximate quantities if known.

Growth occurring pursuant to the Comp. Plan will result in greater withdrawals of groundwater. Withdrawals may reach 3,700 acre-feet per year, in accordance with the city's water rights.

2. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (domestic sewage; industrial, containing the following chemicals…; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

Not applicable.

c. Water Runoff (including stormwater):

a) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

Growth occurring pursuant to the Sumas comprehensive plan can be expected to result in larger areas of impervious surfaces (roads, parking lots, buildings). Because of the predominant clay soils and the high water table, infiltration is generally not extensive. Associated runoff will therefore reach the local surface waters (Johnson Creek, Sumas River, Sumas Creek, Bone Creek, miscellaneous ditches). Various collection methods might be used, such as storm drains, ditches, swales, and constructed wetlands.

b) Could waste materials enter ground or surface waters? If so, generally describe.

Not as a direct result of this proposal. Waste pollutants picked up by stormwater (fertilizers, pesticides, petrochemicals) might enter ground or surface waters.

c) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

Not as a direct result of this proposal. Growth occurring pursuant to the Comp. Plan will result in larger areas of impervious surfaces which may affect drainage patterns throughout the area.

d) Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any.

Implementation of a stormwater program in compliance with the Dept. of Ecology stormwater manual. Stream and wetland buffers protected and enhanced pursuant to the SMP and CAO can be expected to reduce some stormwater impacts. Flood damage prevention regulations help protect development from flooding.

4. Plants Find help answering plants questions

a. Check the types of vegetation found on the site:

- ☑ **deciduous tree: alder, maple, aspen, other**
- ☑ **evergreen tree: fir, cedar, pine, other**
- ☑ **shrubs**
- ☑ **grass**
- ☑ **pasture**
- ☑ **crop or grain**
- ☑ **orchards, vineyards, or other permanent crops.**
- ☑ **wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other**
- ☑ **water plants: water lily, eelgrass, milfoil, other**
- ☑ **other types of vegetation**

b. What kind and amount of vegetation will be removed or altered?

None as a direct result of the proposal.

c. List threatened and endangered species known to be on or near the site.

None.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.

Not applicable.

e. List all noxious weeds and invasive species known to be on or near the site.

Butterfly Bush, Common Catsear, Common Tansy, Common Teasel, English Ivy, Eurasian Watermilfoil, Evergreen Blackberry, Fragrant Waterlily, Robert Herb, Himalayan Blackberry, Meadow Knapweed, Spotted Knapweed, Bohemian Knotweed, Combined Knotweed, Old Man's Beard, Oxeye Daisy, Poison Hemlock, Policeman's Helmet, Reed Canarygrass, Scotch Broom, Tansy Ragwort, Bull Thistle, Canada Thistle, Wild Carrot, Wild Chervil, Yellow Flag Iris.

5. Animals Find help answering animal questions

a. List any birds and other animals that have been observed on or near the site or are known to be on or near the site.

Examples include:

- **Birds: hawk, heron, eagle, songbirds, other:**
- **Mammals: deer, bear, elk, beaver, other: coyote**
- **Fish: bass, salmon, trout, herring, shellfish, other:**

b. List any threatened and endangered species known to be on or near the site.

The Puget Sound chinook listing does NOT apply within the Sumas River basin. The Sumas River

basin is included within the listing area of the bull trout.

c. Is the site part of a migration route? If so, explain.

Yes, the area is within the Pacific Flyway and is a migration route for great blue heron and wintering area for bald eagles.

d. Proposed measures to preserve or enhance wildlife, if any.

Concentrating future development within the urban growth area will preserve wildlife habitat in areas outside the urban growth area. Stream and wetland buffers protected as Natural System Protection Areas (designated within Comp. Plan) are designed to serve as habitat. The Shoreline Master Program also protects stream and wetland buffers, thereby preserving habitat.

e. List any invasive animal species known to be on or near the site.

Insects: Asian and European Gypsy Moth, Asian and Citrus Longhorned Beetle, Brown Marmorated Stink Bug, Emerald Ash Borer, European Chafer, Japanese Beetle, Scarlet Lily Beetle, Spotted Lanternfly

Other Animals: African Clawed Frog, American Bullfrog, European Green Crab, Feral Swine, Mediterranean White Snails, Northern Pike, Nutria, Quagga and Zebra Mussels

6. Energy and Natural Resources Find help answering energy and natural resource questions

1. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

None as a direct result of this proposal. Future population increase is expected to result in an increased demand for electricity and natural gas.

2. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

Not applicable.

3. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.

None.

7. Environmental Health Find help with answering environmental health questions

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur because of this proposal? If so, describe.

None as a result of this proposal.

1. Describe any known or possible contamination at the site from present or past uses.

None.

2. Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

None.

3. **Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.**

   None.

4. **Describe special emergency services that might be required.**

   None.

5. **Proposed measures to reduce or control environmental health hazards, if any.**

   None deemed necessary.

b. Noise

1. **What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?**

   Noise from vehicular traffic, occasional construction noise, typical urban-residential noise (music, air conditioners), and industrial noise sources.

2. **What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?**

   None associated with the proposal.

3. **Proposed measures to reduce or control noise impacts, if any.**

   Local and state regulations govern the levels of allowable environmental noise and are enforced by Sumas. Noise in rural areas is expected to remain at current low levels as a result of concentrating future development within the urban growth area.

8. Land and Shoreline Use Find help answering land and shoreline use questions

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

Land within the City limits is primarily used for residential, commercial and industrial purposes, with some agricultural areas. Land in Sumas' urban growth area is primarily agricultural, including crop production, dairy farms, and pasture lands.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

No amount of agricultural or forest land of long-term commercial significance will be converted to other uses because of this proposal directly. Subsequent approval of Whatcom County's Comprehensive Plan may lead to changes in use of areas to the west and south of Sumas.

1. **Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?**

This proposal would not directly affect or be affected by working farm or forest land normal operations.

c. Describe any structures on the site.

Numerous residential, commercial, and industrial structures exist within the City and urban growth area.

d. Will any structures be demolished? If so, what?

Not as a direct result of this proposal.

e. What is the current zoning classification of the site?

A combination of residential, commercial, and industrial, with some public and agricultural zoning.

f. What is the current comprehensive plan designation of the site?

Similar to zoning.

g. If applicable, what is the current shoreline master program designation of the site?

Within the city's SMP, Johnson Creek and the Sumas River are designated a mix of urban conservancy and shoreline residential along their various reaches. Outside city limits, both streams are designated rural in Whatcom County's SMP. The SMP also designates wetlands within the city as either urban or conservancy.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

Much of Sumas and the surrounding growth area is within the 100-year floodplain. There are also scattered wetlands in the city and growth area, as mentioned above.

i. Approximately how many people would reside or work in the completed project?

Not applicable.

j. Approximately how many people would the completed project displace?

None as a direct result of the proposal.

k. Proposed measures to avoid or reduce displacement impacts, if any.

None deemed necessary.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.

Not applicable.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any.

None proposed as a part of this proposal.

9. Housing Find help answering housing questions

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

None as a direct result of this proposal.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

None as a direct result of this proposal.

c. Proposed measures to reduce or control housing impacts, if any.

None.

10. Aesthetics Find help answering aesthetics questions

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

Not applicable – Non-project proposal.

b. What views in the immediate vicinity would be altered or obstructed?

The appearance of Sumas will be altered as growth occurs. Vacant land will be developed to include new residential structures.

c. Proposed measures to reduce or control aesthetic impacts, if any.

None.

11. Light and Glare Find help answering light and glare questions

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

None directly as a result of this proposal. The typical light sources found in an urban area (street lights, flood lights, vehicle lights, interior lighting) will grow as a result of development that occurs.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

Not applicable.

c. What existing off-site sources of light or glare may affect your proposal?

None.

d. Proposed measures to reduce or control light and glare impacts, if any.

None.

12. Recreation Find help answering recreation questions

a. What designated and informal recreational opportunities are in the immediate vicinity?

Three city park facilities, one school playground and field, sidewalks, and trails. Local streams.

b. Would the proposed project displace any existing recreational uses? If so, describe.

No displacement is planned.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any.

The Sumas comprehensive plan includes a parks and recreation section that contemplates new facilities and programs, including trails, a summer recreation program, a ballfield complex, and a

fishing pond.

13. Historic and Cultural Preservation Find help answering historic and cultural preservation questions

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.

Old customs building and other buildings constructed over 100 years ago.

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

Native-American village site at east end of town, adjacent to Sumas River. This area is not within the area affected by the proposed amendments.

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

Nooksack Tribe Cultural Resources Department Culture Program

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

None.

14. Transportation Find help with answering transportation questions

a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

Cherry Street and Garfield Street serve the downtown commercial area. Sumas and its urban growth area and served by SR 9 and SR 547. The area is also served by some county collectors, including Halverstick Road and Rock Road. Other main routes into town include Hovel Road.

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

The area is served by a fixed-route service operated by the Whatcom Transit Authority. The closest transit stop is within the area affected by the proposal.

c. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

No new or improvements to existing roads, streets, pedestrian, or bicycle facilities are proposed as a direct result of this proposal. Any new or improvements to existing roads, streets, pedestrian, and bicycle facilities will be the responsibility of the developer to construct.

d. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

Sumas is a major border crossing location, with Burlington Northern rail lines transversing town. Sumas is also close to Abbotsford, B.C., airport, which operates a growing number of flights.

e. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

None as a direct result of this proposal.

f. Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

None as a direct result of this proposal.

g. Proposed measures to reduce or control transportation impacts, if any.

None.

15. Public Services Find help answering public service questions

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

Not as a direct result of this proposal. As population and industry increase, the total need for public services is expected to increase.

b. Proposed measures to reduce or control direct impacts on public services, if any.

None.

16. Utilities Find help answering utilities questions

a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

Sumas will provide water, sewer, electric, and storm sewer. Cascade Natural Gas will provide natural gas services. Ziply fiber, Xfinity, and PogoZone will provide internet and phone service.

C. Signature Find help about who should sign

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Type name of signee: Carson Cortez

Position and agency/organization: City Planner

Date submitted: November 20, 2025

D. Supplemental sheet for nonproject actions Find help for the nonproject actions worksheet

IT IS NOT REQUIRED to use this section for project actions.

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of

activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate
than if the proposal were not implemented. Respond briefly and in general terms.

1. **How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?**

   The proposal is not expected to directly contribute to any such impacts.

   - **Proposed measures to avoid or reduce such increases are:**

     None deemed necessary.

2. **How would the proposal be likely to affect plants, animals, fish, or marine life?**

   The proposal is not expected to directly affect plants, animals, or marine life.

   - **Proposed measures to protect or conserve plants, animals, fish, or marine life are:**

     None deemed necessary.

3. **How would the proposal be likely to deplete energy or natural resources?**

   The proposal is not expected to deplete energy or natural resources. Development consistent with City development regulations will help conserve natural resources and natural resource industries.

   - **Proposed measures to protect or conserve energy and natural resources are:**

     None deemed necessary.

4. **How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?**

   This proposal is not expected to directly affect these areas, except to the extent that proposed

amendments to the flood damage prevention ordinance will likely reduce impacts within floodplains and will ensure consistency with the National Flood Insurance Program.

- **Proposed measures to protect such resources or to avoid or reduce impacts are:**

None deemed necessary.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

The proposal is not expected to directly affect these types of areas.

- **Proposed measures to avoid or reduce shoreline and land use impacts are:**

None deemed necessary.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

Projected increases in population may result in the need for increases to transportation or public service facilities and utilities.

- **Proposed measures to reduce or respond to such demand(s) are:**

Any need for increases to transportation or public service facilities or utilities will be the responsibility of the developer.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

No conflicts have been identified.

Appendix V: County-Wide Planning Policies

Appendix C
Countywide Planning Policies

Whatcom County
Countywide Planning Policies
Adopted April 1993
(Revised March 11, 1997, January 25, 2005, and February 9, 2021)

A. ~~Citizen~~ Public Involvement

1. The ~~c~~County and the cities shall cooperate to provide public education on the requirements of the Growth Management Act.

2. The ~~c~~County and the cities shall provide opportunities for ~~citizens~~ the public to become involved in the growth management planning process through various mechanisms, such as surveys, public workshops, meetings, hearings, and advisory committees. The method of ~~citizen~~ public involvement may vary based on the needs and constituents in various communities and shall include representation of both rural and urban interests on those issues that affect both urban and rural areas.

3. ~~Citizens~~ The public shall be notified in a timely manner of opportunities to have input and key decision points in the planning process. This should include actions such as use of on-line resources, notification lists, ~~use of telephone hotlines, notification to interest groups, pre-development meetings, early~~ timely consideration~~incorporation~~ of public comments, ~~and~~ broader notification of property owners and residents during a planning process, and ~~as well as working more extensively with~~ notification to community and neighborhood groups. The cities shall also develop a public participation process to solicit and consider~~incorporate~~ comments from residents outside city limits but within existing and proposed Urban Growth Areas.

   Rationale for Changes: The County has a "notify me" list that people can sign up for various email lists. Telephone hotlines are generally not used. The Growth Management Act states that ". . . a 'countywide planning policy' is a written policy statement or statements used solely for establishing a countywide framework from which county and city comprehensive plans are developed and adopted . . ." (RCW 36.70A.210(1)). Countywide Planning Policies relate to the comprehensive plan adoption process, rather than to the permit review process. Therefore, "pre-development meetings" should be removed.

4. ~~Citizen~~ Public comments and viewpoints shall be considered in ~~incorporated into~~ the decision-making process in development of draft plans and

regulations. Consideration of ~~citizen~~ public comments shall be evident in the decision-making process.

Rationale for Changes: The County Council, city councils, and public officials consider public comments when updating comprehensive plans. However, there are times when such comments may be diametrically opposed to one another. There may be other times when council members, duly elected by a majority of the citizens, may not think that public comments from individual community members reflect the good or viewpoints of the community at large. Therefore, it should be acknowledged that, while council members will consider public comments, they are not bound to follow them.

5. The ~~c~~County and the cities shall establish a system for ~~subarea,~~ community and neighborhood liaison to foster communication between the respective government and its neighborhoods. This system would also provide a point of contact for issues that may affect ~~subareas,~~ the community~~,~~ or neighborhoods.

Rationale for Changes: The County has repealed a number of Subarea Plans. Communication between the local government and the affected community or neighborhood is sufficient.

6. Various planning techniques, such as overlay maps and Geographic Information Systems, shall be utilized to allow ~~citizens~~ the public and public officials to evaluate planning proposals and provide the ability to make accurate comparison of issues so appropriate trade-offs can be consciously made.

Rationale for Changes: Planning techniques, such as use of GIS, can be used in a variety of ways to evaluate planning proposals. Therefore, the language has been modified as shown above.

B. Urban Versus Rural Distinctions

1. Whatcom County shall primarily become a government of rural areas in land use matters directed towards agriculture, forestry and other natural resources and natural resource based industries. The county ~~shall~~may work with the public~~citizens~~ to further define or modify~~a variety of~~ types of rural areas based on the characteristics and needs of different areas. This Section shall not preclude ~~c~~County governance of large urban industrial areas outside of the city UGA's (see Cherry Point below), ~~developed urban areas within~~ urban growth areas not yet annexed or incorporated, and developed rural areas where the "urban" designation is inappropriate.

Rationale for Changes: The Whatcom County Comprehensive Plan already defines a variety of types of rural areas. The County has jurisdiction over the portions of the UGAs associated with the seven cities that have not yet been annexed. The County also has jurisdiction over the three non-city UGAs (Birch Bay, Columbia Valley, and Cherry Point). The County has jurisdiction over all areas in these UGAs, regardless of whether they are developed or undeveloped areas.

2. The ~~c~~County shall discourage urban level or high intensity development outside Urban Growth Areas, ~~and~~ limited areas of more intensive rural development (LAMIRDS), and vested plats~~outside of areas currently characterized by a development threshold greater than a rural development density~~.

Rationale for Changes – Urban level development and higher intensity development should only be allowed in UGAs, LAMIRDs, and previously approved subdivisions. This should be clearly stated.

3. Whatcom County shall promote appropriate land uses and allow for infill within LAMIRDs~~rural settlements characterized by existing commercial, industrial and intensive residential development greater than a rural development density~~. These areas have been~~should be clearly~~ delineated, and will not be expanded beyond logical outer boundaries in accordance with RCW 36.70.070(5). ~~Impacts on rural character, critical areas and other economic considerations as well as the availability of capital facilities and rural levels of service must be considered before allowing infill in these areas.~~

Rationale for Changes: Referencing LAMIRDs more clearly identifies the areas where rural infill is being promoted. LAMIRDs have already been delineated and development regulations adopted. The Growth Management Act states that ". . . a 'countywide planning policy' is a written policy statement or statements used solely for establishing a countywide framework from which county and city comprehensive plans are developed and adopted . . ." (RCW 36.70A.210(1)). Countywide Planning Policies relate to the comprehensive plan adoption process, rather than to the permit review process. Therefore, the last sentence should be deleted.

4. In the next 20 years, Whatcom County should discourage "new fully contained communities" (as defined and authorized by RCW 36.70A.350) outside designated Urban Growth Areas.

5. Whatcom County ~~should~~may undertake a public process to further define or modify rural areas and rural growth as distinct from ~~urban areas and~~ urban growth areas.

Rationale for Changes: Whatcom County's Comprehensive Plan now defines and distinguishes between rural and urban growth. The above policy, as revised, would address future modifications.

C. Urban Growth Areas

1. Urban growth needs shall be met by a combination of in-fill within cities and by growth within designated city~~municipal~~ and non-city~~non-municipal~~ Urban Growth Areas.

Rationale for Change: The term "city urban growth area" is used in the Whatcom County Comprehensive Plan and substituting this term would likely make the above text easier to understand.

2. The size and location of Urban Growth Areas shall be consistent with the Growth Management Act, adopted local policies and ~~with the~~ capital facilities plans.

Rationale for Changes: The Growth Management Act imposes requirements that local governments must meet when determining the size and location of UGAs.

3a. The County and Cities will work together to develop countywide population and housing need projections, and associated allocations to Urban Growth Areas, that are within the range of the Washington State Office of Financial Management projections. The County and Cities will also work together to develop countywide employment projections and associated allocations to Urban Growth Areas.~~The most current, accurate population projections based on a range provided for Whatcom County by the Office of Financial Management shall~~ These allocations will be used to determine whether~~as the basis for determining that~~ Urban Growth Areas ~~shall~~ include sufficient land capacity~~area~~ to permit the urban growth that is projected to occur in the ~~c~~County for the succeeding twenty-year period.

Rationale for Changes: The amendments above more clearly state the process for developing countywide projections and UGA allocations. Additionally, it references "land capacity" that consists of both buildable area *and densities* in the UGA.

3b. The County and Cities shall develop a Land Capacity Analysis Methodology, which is a consistent approach to calculating the land supply needed within an urban growth area. ~~This approach shall~~ The Land Capacity Analysis Methodology will consider limitations imposed by critical area regulations, infrastructure needs, open space, existing uses, local market factors and the ability of the jurisdiction to provide services. It is recognized that the above limitations may vary by jurisdiction, but the method for applying them shall be consistent. Urban growth areas shall permit a range of densities and uses; however, ~~in recognition of community character,~~ these uses and densities may vary among jurisdictions.

Rationale for Changes: The County and cities have called the referenced approach the "Land Capacity Analysis Methodology." In response to the State Department of Commerce's *Guidance to Address Racially Disparate Impacts* (April 2023), the above reference to "community character" has been deleted.

4. Urban Growth Areas shall be evaluated in the timeframes set forth in the Growth Management Act~~at least every ten years~~ to determine if they contain sufficient land capacity~~area~~ to accommodate the urban growth that is projected for the succeeding twenty-year period. The market factor for each Urban Growth Area shall also be evaluated. The Land Capacity Analysis will be used to determine whether the land supply is adequate to meet the needs of the community or whether the land supply is excessive ~~and contributing to sprawl~~.

Rationale for Changes: The Growth Management Act governs how often UGAs need to be reviewed/updated (and this has changed from time to time). UGAs need to have sufficient land capacity, which consists of both area *and densities*. The Land Capacity Analysis shows whether the land supply is adequate or not. The market factor is one component of the Land Capacity Analysis, but there are other important components that go into determining the capacity of land to accommodate growth. Finally, the Growth Management Act requires that UGAs be sized to accommodate the 20-year growth allocations (basically, no more and no less). Land supply can be excessive while still not contributing to sprawl. County zoning typically does not allow low-density sprawl in UGAs.

5. Urban Growth ~~a~~Areas should be established in a way that preserves agricultural land, forestry, mineral resources, treaty natural resources (e.g. salmon, wildlife, traditional foods), tribal cultural resources, water resources, and critical areas. Urban growth shall maintain proper buffers from natural resource areas to minimize conflicts with natural resources and industries based on them. Any proposed UGA expansion in the 100 year floodplain must

comply with RCW 36.70A.110. Any proposed UGA expansion should minimize risks posed by natural hazards.

D. City Urban Growth Areas

1. The Urban Growth Areas for the small cities shall be of an adequate size to allow them to become viable economic centers with a balance of jobs and housing. The small cities shall do appropriate planning to ensure adequate distribution of land uses and services at a range of urban densities and zoning classifications.

2. Urban Growth Areas for cities shall include those areas contiguous to cities that are suitable for urban growth as set forth in~~and with urban characteristics as defined by~~ the Growth Management Act. ~~The Geneva area in Bellingham's UGA is characterized by urban development, but is also identified by the city and county as a Water Resource Protection UGA because of its location in the Lake Whatcom Watershed. Lake Whatcom is the drinking water source for much of the Bellingham urban area. Geneva is appropriate to include in an urban growth area, but is not an area where additional urban development is desirable.~~

   Rationale for Changes: The term "urban growth" is defined and used in the Growth Management Act (for example, see RCW 36.70A.030(28)). The term "urban characteristics" is not defined or used in the Growth Management Act. The Planning Commission passed a motion on January 23, 2025 to delete the language relating to the Geneva UGA.

3. Cities shall develop ~~a~~ plans to provide urban level water and sewer services within their Urban Growth Areas. ~~This~~ These plans should be developed in cooperation with existing water and sewer purveyors ~~and other municipal corporations providing water or sewer services~~ within each city's Urban Area, and may~~should~~ be implemented through interlocal agreements. ~~Short term and long term boundaries may be used to facilitate provision of urban levels of service and to not preclude future urban densities as defined within the Whatcom County Comprehensive Plan.~~

   Rationale for Changes: Water system plans and sewer plans are typically separate documents. Cities and water/sewer purveyors may choose to enter into interlocal agreements or may coordinate in other ways. Short term and long term planning areas no longer exist in the Whatcom County Comprehensive Plan or Zoning Code.

4. Existing cities should accommodate~~absorb~~ additional housing~~population~~ at a range of densities appropriately responsive to the city's community vision before extending city Urban Growth Areas into areas where growth would

adversely impact critical areas and resource lands. In those small cities entirely or almost entirely surrounded by flood plains, critical area and resource lands or within Shellfish Protection Districts, the ~~c~~County and cities~~the city~~ shall seek to negotiate a balance between protection of resources and the allocation of adequate land area to meet the growth needs of the city ~~and to maintain the desired character of the community~~.

Rationale for Changes: The cities of Everson, Nooksack and Lynden are largely, but not entirely, surrounded by floodplain and resource lands. The change allows the above policy to apply to these cities (Sumas is entirely surrounded). In response to the State Department of Commerce's *Guidance to Address Racially Disparate Impacts* (April 2023), the above reference to "character of the community" has been deleted.

5. All cities should grow in an efficient manner ~~while maintaining their character~~ and, where reasonable, shall provide for adequate open space between cities ~~to prevent strip development~~.

Rationale for Changes: In response to the State Department of Commerce's *Guidance to Address Racially Disparate Impacts* (April 2023), the above reference to maintaining "character" has been deleted. "Strip development" can be defined as linear commercial development along a public highway that includes three or more of the following characteristics: broad road frontage, predominance of single-story buildings, limited reliance on shared highway access, lack of connection to any existing settlement except by highway, lack of connection to surrounding land uses except by highway, lack of coordination with surrounding land uses, and limited accessibility for pedestrians (Law Insider). Two cities growing together wouldn't necessarily lead to strip development.

6. Cities should be encouraged to provide positive incentives for in-fill.

E. Non-City Urban Growth Areas

1. Urban Growth Areas have been ~~may also be~~ established in areas that are not contiguous to existing cities, and are already characterized by urban growth where adequate facilities and services can be provided ~~and which are intended to meet needs not met by cities and their Urban Growth Areas~~. These are the Birch Bay, Cherry Point, and Columbia Valley UGAs.

Rationale for Changes: Whatcom County adopted three non-city UGAs in the 1990s: Birch Bay, Columbia Valley, and Cherry Point. While these UGAs may meet some countywide needs not met by cities (e.g. heavy

industry at Cherry Point), they were primarily adopted to recognize the existing urban uses and future potential to accommodate urban growth.

2. Non-city urban growth areas, for already urbanized unincorporated residential areas, shall be encouraged to infill in a way that will facilitate efficient provision of facilities and services consistent with the scale of development.

3. 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.

4. The County shall assure that there are plans to provide appropriate levels of urban facilities and services within non-city Urban Growth Areas. These plans should be developed by special purpose districts, water associations and private service providers within each of these Areas, and mayshould be implemented, where appropriate, through interlocal agreements. ~~Short term and long term boundaries may be used to facilitate provision of urban levels of service.~~

   Rationale for Changes: The County and water purveyors may choose to enter into interlocal agreements or may coordinate in other ways. Short term and long term planning areas no longer exist in the Whatcom County Comprehensive Plan or Zoning Code.

F. Contiguous, Orderly Development and Planning in Urban Growth Areas

1. Cities~~,~~ and the cCounty ~~and special districts~~ shall execute interlocal agreements to coordinate plans for and manage growth in Urban Growth Areas prior to annexations. Interlocal agreements shall acknowledge and implement the Countywide Planning Policies.

   Rationale for Change: The Growth Management Act states that ". . . a 'countywide planning policy' is a written policy statement or statements used solely for establishing a countywide framework from which county and city comprehensive plans are developed and adopted . . ." (RCW 36.70A.210(1)). Special purpose districts are not subject to the Countywide Planning Policies. Counties and cities cannot, through adoption of a countywide planning policy, require a special purpose district to enter into an interlocal agreement.

2. Interlocal agreements shall incorporate clear and reasonable criteria for orderly annexation. The ~~c~~County and the cities shall establish a process to consider ~~incorporate representative citizen~~ public input as part of ~~into~~ the interlocal agreement approval processes and, if appropriate, encourage ~~appropriate~~ districts to participate. If adequate procedures are developed to replace it, the Boundary Review Board may be replaced.

   Rationale for Changes: There may be interlocal agreements that do not involve special purpose districts. The above change gives the County and cities discretion to ask districts to participate as appropriate.

3. All urbanized areas currently within urban growth boundaries associated with cities should be encouraged to annex to cities. Orderly annexations with logical boundaries are~~shall be~~ encouraged. Interlocal agreements shall specify guidelines on size, timing of annexations and urban levels of development, and tax revenue sharing when appropriate.

4. Within Urban Growth Areas, cities shall not extend water and sewer utilities without an adopted program for annexation and an adopted Capital Facilities Plan. Exceptions may be made in cases where human health is threatened as determined by the County Health Department. If water extensions are made, they shall be consistent with the service area boundaries and other provisions within the adopted Coordinated Water System Plan.

5. In the areas where utilities presently extend beyond city limits, but are within Urban Growth Areas, the city, ~~c~~County, and the existing water purveyors for the area should coordinate planning effort~~sjointly plan with the county~~. ~~The County shall adopt zoning which reflects this joint planning.~~

   Rationale for Changes: The County has already adopted zoning within all UGAs.

6. Unless specifically provided for by state statutes, Cities~~, other municipal corporations, and other public and private utilities~~ shall not extend urban levels of water service to serve urban uses outside Urban Growth Areas. If legally allowed water extensions are made outside of Urban Growth Areas, the maximum number of connections shall not exceed the density allowed under the associated zoning. The number of connections shall be specified in a legally binding document at the time the extension is approved. Property contiguous to extension of utilities necessary to solve existing water deficiencies, but which cannot benefit from them because of zoning constraints, shall not be assessed for those improvements.

   Rationale for Changes: Countywide planning policies apply to cities but not to other water purveyors.

7. The availability of pipeline capacity required to meet local needs and/or supply shall not be used to justify comprehensive plan and/or rezone applications that propose more intensive land use~~development counter to the countywide land development pattern and shall not be considered~~ in ~~conversions of~~ agricultural land, forestry, and rural areas.

   Rationale for Change: The Growth Management Act states that ". . . a 'countywide planning policy' is a written policy statement or statements used solely for establishing a countywide framework from which county and city comprehensive plans are developed and adopted . . ." (RCW 36.70A.210(1)). Countywide Planning Policies do not apply directly to development. Additionally, the term "conversions" is undefined. The above change clarifies when pipeline capacity should not be used to support a comprehensive plan and/or zoning map amendment.

8. The cities~~, other municipal corporations, public utilities,~~ and the ~~c~~County shall cooperate to identify and balance the needs of each jurisdiction and entity when planning for transition of services and annexation within Urban Growth Areas. The cities and the County should coordinate with special purpose districts and other service providers in this process. This intergovernmental cooperation and coordination may~~should~~ be reflected in revenue agreements, work programs for joint projects, and regional solutions adopted by the affected parties.

   Rationale for Changes: The Growth Management Act states that ". . . a 'countywide planning policy' is a written policy statement or statements used solely for establishing a countywide framework from which county and city comprehensive plans are developed and adopted . . ." (RCW 36.70A.210(1)). Other municipal corporations and public utilities are not subject to the Countywide Planning Policies. However, the County and cities may coordinate with service providers, as necessary. Substituting the word "may" for "should" gives the County and cities flexibility in fashioning solutions appropriate for the situation.

9. Major transportation, utility and greenway corridors shall be planned within Urban Growth Areas. ~~Development shall be consistent with these corridors. The county shall ensure conformance through the permit process and incentive programs.~~

   Rationale for Changes: The Growth Management Act states that ". . . a 'countywide planning policy' is a written policy statement or statements used solely for establishing a countywide framework from which county

and city comprehensive plans are developed and adopted . . ." (RCW 36.70A.210(1)). Countywide Planning Policies relate to the comprehensive plan adoption process, rather than to the development and the permit review process.

10. Interlocal agreements shall include a process for reviewing~~provisions for agreed upon~~ development standards within Urban Growth Areas. ~~Unless a different standard is negotiated, the more rigorous of the standards shall be enforced by the county.~~

Rationale for Changes: The County would need to duly review and adopt development standards before enforcing such standards within the unincorporated portion of the UGA. Development standards cannot be enacted through an interlocal agreement.

~~11. The county and the City of Bellingham shall establish, through the Urban Fringe Subarea Plan update, the policies, zoning and criteria to comply with current state Growth Management law.~~

Rationale for Changes: The County and cities comply with the Growth Management Act through adopting and updating their respective comprehensive plans. Because the Whatcom County Comprehensive Plan contains goals and policies relating to UGAs, rural lands, agricultural lands, etc., the County has repealed a number of subarea plans (subarea plans are optional under RCW 36.70A.080(2)). Deleting the above policy would give the County and City of Bellingham the flexibility to review and decide whether the Urban Fringe Subarea Plan is still needed.

~~12.~~11. To encourage contiguous, orderly development and annexation of residential lands in Urban Growth Areas around cities, the ~~c~~County shall designate Urban Residential or other zones limiting density to a maximum of one dwelling unit per ten~~five~~ acres ~~in undeveloped areas~~ until public water and sewer~~urban level utilities~~ are provided. ~~Developed or partially developed areas presently zoned Residential-Rural shall retain that zoning. In the Bellingham Urban Growth Area, substantial development and subdivisions already have occurred without annexation. The revised Urban Fringe Subarea Plan and a new Interlocal Agreement between the City of Bellingham and the county will address sequence and timing for annexations, subdivisions, and urban levels of development.~~

Rationale for Changes: The Urban Residential zone has been amended to only allow one dwelling/ten acres when public water and sewer are

not provided, to ensure more efficient urban development when such services become available (typically upon annexation). There is no Residential Rural zoning in UGAs anymore. The existing interlocal agreement addresses annexations and development in the UGA.

~~13.~~12. ~~In Urban Growth Areas where development is occurring based on the presence of utilities, urban development shall meet common urban standards including fire flow requirements and supply. The county and the cities will work together to develop reasonable standards over time.~~

Rationale for Changes: The Growth Management Act states that ". . . a 'countywide planning policy' is a written policy statement or statements used solely for establishing a countywide framework from which county and city comprehensive plans are developed and adopted . . ." (RCW 36.70A.210(1)). Countywide Planning Policies relate to the comprehensive plan adoption process, rather than to the development in the UGA.

~~14.~~13. The County and the cities shall coordinate drainage, stormwater management and flood control in Urban Growth Areas ~~and work toward the development of common standards~~.

Rationale for Change: The County and cities have adopted and apply standards for their respective jurisdictions.

G. Affordable Housing

1. The ~~c~~County and the cities shall take actions to ensure a balance of housing and economic growth consistent with each jurisdiction's employment base and diverse income levels and to reduce commuting times and traffic congestion.

2. The ~~c~~County and the cities shall identify sufficient capacity of land for a healthy mix of home types, sizes, and prices, including but not limited to ownership opportunities for the widest possible range of incomes, income-restricted housing, manufactured housing, multifamily housing, co-living housing, farmworker housing, group homes, foster care facilities, emergency housing, emergency shelters, and permanent supportive housing and other supportive housing types~~plan for a range of housing types and costs commensurate with their affordable housing needs~~.

Rationale for Change: The Growth Management Act requires that countywide planning policies must address "Policies that consider the need for affordable housing, such as housing for all economic segments of the population and parameters for its distribution" (RCW 36.70A.210(3)(e)). In a letter of March 15, 2024, the Whatcom County Housing Advisory Committee recommended changes to the Countywide Planning Policies. The City/County Planner Group concurs with these

changes, with the addition of references to "co-living housing" and "farmworker housing."

3. Affordable housing should be convenient to major employment centers and public services or be designed to accommodate public transportation.
4. The ~~c~~County and the cities shall promote innovative techniques and develop strategies to provide for affordable housing with design, density, lot sizes and development standards that provide for a variety of housing types.
5. The ~~c~~County and the cities shall review existing regulations and policies that exclude or discourage multi-family, co-living housing, farmworker housing, low-income, and permanent supportive housing and emergency housing and shelter ~~affordable housing~~ in their communities and reduce any identified barriers; they~~and~~ shall not adopt regulations and policies which do so. Mobile, modular, and manufactured homes on individual lots, mobile home parks, accessory units, inclusionary zoning, mixed use, and increased densities shall be reviewed as affordable housing alternatives.

   Rationale for Change: In a letter of March 15, 2024, the Whatcom County Housing Advisory Committee recommended changes to the Countywide Planning Policies. The City/County Planner Group concurs with these changes, with the following modifications:

   - Insert "co-living housing;"
   - Insert "farmworker housing;"
   - Insert "permanent" before supportive housing;
   - Insert "emergency housing" before shelter.

6. The ~~c~~County and the cities ~~should~~ shall work together, and with the private sector, other public and non-profit agencies, ~~citizen~~ community groups, and trade representatives to plan for a regional distribution of housing for all income levels, including permanent supportive housing types and emergency housing and shelter for very low-income households~~assure that there is an adequate supply of sites available for affordable housing and to encourage housing design that is compatible with the surrounding neighborhoods~~.

   Rationale for Change: In a letter of March 15, 2024, the Whatcom County Housing Advisory Committee recommended changes to the Countywide Planning Policies. The City/County Planner Group concurs with these changes, with the following modifications:

   - Replace "assure" with "plan for;"
   - Insert "permanent" before supportive housing;
   - Insert "emergency housing" before shelter.

7. Low income, multi-family and diverse and supportive housing options shall not be concentrated in only a few communities or neighborhoods.

   Rationale for Change: In a letter of March 15, 2024, the Whatcom County Housing Advisory Committee recommended changes to the Countywide Planning Policies. The City/County Planner Group concurs with these changes. The County Council added "Low income" back in the above policy.

8. The ~~c~~County and the cities shall consider reducing impact and/or mitigation fees for affordable housing provided in a proposed development.

9. ~~Each jurisdiction should explore options for providing shelter for the homeless.~~

   Rationale for Change: In a letter of March 15, 2024, the Whatcom County Housing Advisory Committee recommended deleting this Countywide Planning Policy. The City/County Planner Group concurs with this change, as emergency shelter is addressed in the policies above.

H. Open Space/Greenbelt Corridors

1. Adequate open space is vital to the quality of life and sense of place in Whatcom County. The ~~c~~County, cities, Port of Bellingham, and other appropriate jurisdictions should coordinate protection of linked greenbelts, within and between Urban Growth Areas, parks, and open space to protect wildlife corridors, provide flood resilience, support infiltration of water, and to enhance recreational opportunities, public access and trail development.

2. The ~~c~~County and the cities shall plan for greenbelts and open space in their Comprehensive Planning processes and coordinate with each other. Open space systems should include lands which contain natural areas, habitat lands, natural drainage features, and/or other environmental, cultural and scenic resources. With increased residential densities, jurisdictions also should ensure provision of adequate neighborhood parks and play areas within safe bicycling and walking distance for children.

3. The ~~c~~County and the cities shall encourage, to the extent it is feasible, separation of Urban Growth Areas through planning, zoning, development regulations, open space purchase, conservation easements and other mechanisms which may be appropriate. ~~Also, an array of i~~Incentives such as density bonuses, design flexibility, density credit/fee in lieu and transferable development rights may~~shall~~ be offered to affected land owners.

   Rationale for Changes: The goal of this policy is separation of UGAs. There are different methods for achieving this goal. Land owner incentives may or may not be used by individual jurisdictions to achieve the goal. The County and cities should have the discretion to decide whether land owner incentives will be used in their particular situation.

4. The County and ~~C~~cities should work cooperatively to protect and restore stream corridors within Urban Growth Areas that support anadromous fish.

I. Economic Development and Employment

1. Whatcom County recognizes that a healthy economy, which provides opportunity for diverse segments of the community, is important to the quality of life in the area. The ~~Greater~~ Whatcom County Comprehensive Economic Development Strategy (CEDS) "is a long-term planning document that is intended to guide economic development throughout a region~~is intended to put forth economic development alternatives for Whatcom County that will support jobs creation, with an emphasis on higher wage jobs and diversification.~~"

   Rationale for Changes: The current version is called the "Whatcom County" CEDS (not the "Greater Whatcom" CEDS). The inserted quote is from p. 42 of the current CEDS. The deleted quote no longer resides in the CEDS.

2. New business development and expansion of existing businesses are key factors in providing "family wage" jobs and a strong tax base. Economic development that pays family wage rates should be encouraged. Industrial land designations must be sufficient to permit the concentration of industry in appropriate locations for the 20 year planning period~~beyond 20 years~~. In order to attract new industry and provide for expansion of existing industries, the ~~c~~County and the cities will designate land supply of sufficient size and diversity to provide a range of suitable locations for industrial development. The designation of this land shall be established in a way that preserves natural resource based industries and critical areas.

   Rationale for Changes: The Growth Management Act requires that UGAs be sized to accommodate the 20-year growth allocations (basically, no more and no less). This includes the allocations for employment lands (industrial and commercial).

3. To provide sufficient land supply for industrial growth and development, industrial designations must not only include lands suitable for development, but also lands suitably zoned to provide adequate buffers. It is also important that these lands and buffers be conserved with appropriate land use and zoning provisions to ensure that they will be available for future use.

4. Encourage workforce education and training and responsible and sustainable business ~~location,~~ recruitment, retention, and expansion according to city and ~~c~~County comprehensive plans and current Whatcom County Comprehensive Economic Development Strategy (CEDS) in order to support ~~meet current and future demand for~~ diverse and resilient business and industry. Work with funding agencies and the private sector to facilitate extension of adequate electric, sewer, water, telecommunications and road access to existing

commercial and industrial-zoned properties, creating shovel-ready sites. ~~Cities and county may utilize the "Quick Sites" economic development program through OTED, which links strategic elements of planning, zoning, environmental review, and permitting with the business siting effort.~~

Rationale for Changes: The City/County Planner Group subcommittee requested that the Port of Bellingham review and provide recommendations relating to the above policy. The Port provided the recommended modifications in an email dated 11/28/2022, which the City/County Planner Group accepted with minor changes.

5. The ~~c~~County and the cities should include an economic development element in their Comprehensive Plans. Economic development elements should be consistent with the CEDS. Economic development shall be coordinated with environmental concerns to protect the quality of life. Planning efforts should address economic sustainability. As part of the comprehensive planning process and through implementation of the comprehensive plan, the County has~~shall develop and~~ adopted goals, policies and regulations that protect resource lands ~~industries~~ and support and encourage resource-based industries.

6. The ~~c~~County and the cities should continue to cooperate with the Port of Bellingham's Economic Development Division, Regional Economic Partnership~~through the Partnership for a Sustainable Economy~~ to maintain the CEDS for infrastructure funding. Other appropriate organizations, businesses, and individuals should be involved in the process.

   Rationale for Changes: The Port of Bellingham's Economic Development Division, Regional Economic Partnership now leads updating the CEDS.

7. Economic vitality and job development shall be encouraged in all the cities and in designated areas of the ~~c~~County consistent with County and city comprehensive plan~~community growth~~ policies, particularly addressing adequacy of transportation corridors, public transportation, impacts on the environment, and the ability of the area to provide urban services in UGAs and rural services outside UGAs.

   Rationale for Changes: Changing "community growth policies" to "comprehensive plan policies" clarifies the intent of the language. The Growth Management Act defines both urban services and rural services (RCW 36.70A.030(25) and (27)). Generally, urban services are not appropriate outside UGAs (RCW 36.70A.110(4)).

8. Economic development should be encouraged that:
   a. Does not adversely impact the environment;
   b. Is consistent with ~~community values stated in~~ local comprehensive plans;

c. ~~Encourages development that p~~Provides jobs to ~~c~~County residents;

d. Addresses unemployment problems in the ~~c~~County and seeks innovative techniques to attract different industries for a more diversified economic base;

e. Promotes reinvestment in the local economy;

f. Supports retention and expansion of existing businesses.

Rationale for Changes: County and city comprehensive plans contain goals and policies that guide economic development. Makes the language more concise.

g. Promotes transition to and development of renewable energy sources.

9. The County and the cities recognize the need for the protection and utilization of natural resources and resource lands including agricultural, mineral, forestry and fishing. As part of a broad based economy, productive timber, agriculture, ~~and~~ fisheries, and mineral resource industries should be supported to operate in a sustainable manner.

10. The cities and ~~c~~County may~~agree to~~ set policies for approving proposals to authorize siting of Major Industrial Developments for large or resource-based industries outside of Urban Growth Areas (as per RCW 36.70A.365). The master planning process for specific manufacturing, industrial, or commercial businesses shall address infrastructure, buffers, environmental protection, sprawl, resource lands, critical areas, and land supply.

11. Whatcom County and the cities encourage~~s~~ siting of industrial uses in proximity to and to further utilization of our access to deep water and port facilities for shipping, rail, airports, roadways, utility corridors and the international border.

J. Countywide Transportation Facilities and Strategies

1. The Whatcom Council of Governments (WCOG), composed primarily of elected officials appointed from all area jurisdictions, is the designated ~~A~~ Regional Transportation Planning Organization (RTPO) ~~has been established in~~ for Whatcom County. Under the Growth Management Act (GMA), RTPOs are directed to conduct regional, cooperative transportation planning. WCOG is also the region's federally-recognized Metropolitan Planning Organization (MPO). As a combined RTPO/MPO, WCOG~~The RTPO has completed a~~ regularly updates a 20-year Regional/Metropolitan Transportation Plan (R/MTP) including contents required by GMA (and by federal, MPO planning laws and regulations)~~including countywide transportation policies~~. The R/MTP includes regional transportation goals, projected system conditions, strategies, and investment priorities. ~~The~~ WCOG has adopted the R/MTP ~~has been approved by a regional transportation Policy Board consisting of elected representatives~~

~~of most area jurisdictions. The Transportation Chapter of the Whatcom County Comprehensive Plan and the Comprehensive Plans for each of the City's must be consistent with the RTP as it is amended~~. The GMA requires RTPOs to review and certify that updates to local comprehensive plans' transportation elements (counties and cities) and changes to county-wide planning policies 1) conform with GMA requirements and 2) are consistent with the current R/MTP. The ~~c~~County and the cities will continue to support the RTPO on an on-going basis to coordinate transportation planning across Whatcom County.

Rationale for Changes: The City/County Planner Group subcommittee requested that the Whatcom Council of Governments review and provide recommendations to incorporate the WCOG's status as MPO into the above policy. The WCOG provided the recommended changes above in emails dated 11/9/2022 and 11/14/2022.

2. Whatcom County jurisdictions shall encourage multimodal transportation, including alternative modes of transportation to the single occupancy vehicle. Each jurisdiction shall encourage:
   a. Use of public transportation;
   b. Development of ~~liked~~ on-street bicycle routes and pedestrian and bicycle trail corridors;
   c. Adequate pedestrian facilities;
   d. Connections between different modes of transportation;
   e. Intermodal connection of freight transportation.
3. To encourage multimodal transportation,~~use of~~ single occupant vehicle alternatives and development of pedestrian scale neighborhoods, high density residential development shall be encouraged in urban growth areas with particular attention to those locations within cities and in close proximity to arterials and main transit routes.
4. Cities are particularly encouraged to support transit and pedestrian friendly mixed use developments within their UGAs to help achieve the goals supported in these policies.
5. Where the ~~roadway~~ level of service (LOS) for a locally owned transportation facility adopted in a County or city~~local~~ comprehensive plans cannot be maintained as a result of proposed new development, that development shall be denied, unless transportation improvements or strategies to accommodate the impacts of development are made concurrent with the development~~the proponents agree to pay a proportionate share of the cost of maintaining the LOS~~.

Rationale for Changes: The Growth Management Act requires concurrency for locally owned transportation facilities, but not for state facilities. Additionally, the Growth Management Act language relating

to transportation improvements or strategies has been substituted for the language currently in the Countywide Planning Policies (see RCW 36.70A(6)(b)).

6. Strategies for maintaining established levels of service may include transportation demand management techniques, ~~project~~ impact or mitigation fees, enhanced access to public transportation service, and/or other steps to reduce or limit traffic congestion.

7. Priorities shall be established and expenditures coordinated for countywide bicycle and trail corridors. Bicycle and pedestrian-specific trails and other facilities shall be included during project planning and review. Coordinated corridors and cost sharing should be explored among all responsible and interested parties.

8. Whatcom County and the cities should work cooperatively with the Whatcom ~~County~~ Council of Governments, ~~Cities,~~ Whatcom Transportation~~Transit~~ Authority, WSDOT and other agencies with jurisdiction to plan for inter-county and international transportation links, such as airports, border crossings, passenger rail, freight rail, transit, ferries, and other transportation facilities.

   Rationale for Changes: The County is not the lead entity planning for some of the transportation facilities shown above. Additionally, the Countywide Planning Policies apply to the County and the cities. Both the County and cities have an interest in these facilities and should work together with appropriate entities to address them.

9. Encourage "complete streets" principles. Complete streets are designed and operated to enable safe use and support mobility for all users, including people of all ages and abilities, regardless of whether they are travelling as drivers/passengers, pedestrians, bicyclists, or public transportation riders.

   Rationale for Changes: The Whatcom Council of Government suggested the above language, based upon the U.S. Department of Transportation Complete Streets concepts (see U.S. Department of Transportation website).

K. Siting of Public Facilities

1. As part of the comprehensive planning process, the eCounty and the cities shall identify appropriate land for public facilities which meets the needs of the community, such as schools, recreation, transportation and utility corridors, human service facilities, and airport and other port facilities. ~~In order to reduce land use conflicts, policies related to a design component shall be incorporated in the comprehensive plans.~~

   Rationale for Changes: Whatcom County no longer has a "Design" chapter in the Comprehensive Plan. Additionally, some cities do not have design chapters in their comprehensive plans. A design chapter is not

a required comprehensive plan element under the Growth Management Act.

2. The ~~c~~County and the cities will implement a cooperative and structured process, which includes early and continuous public involvement, to consider siting of essential public facilities of a regional and statewide nature. State facilities shall conform to local siting procedures.
3. Public facilities that generate substantial travel demand should be sited along or near major transportation and public transit corridors, where available.
4. The ~~c~~County and the cities shall work with their respective school district to encourage siting of schools in ~~conjunction with~~ areas where substantial development exists or is projected and near public transportation corridors.
5. Sharing of corridors for major utilities, trails and other transportation rights-of-way is encouraged when not in conflict with goals to protect wildlife, public health and safety.

L. Impact Fees

1. The ~~c~~County and the cities are encouraged to adopt fair and reasonable impact and/or mitigation fee ordinances to ensure that new growth pays its fair share of the cost of capital facilities, such as transportation improvements, parks, ~~and~~ schools, and fire protection facilities.
2. When requested by a school district or fire district, ~~T~~the ~~c~~County and cities should~~shall~~ work with the~~their school~~ district~~s~~ to develop impact fees ~~formulas~~ as appropriate to the district's capital needs.

   Rationale for Changes: Some school districts in Whatcom County collect impact fees and others do not. School districts that have impact fees typically develop their own fees, often with the assistance of a consultant the district hires. The County and cities may provide planning information, such as growth projections, but would not develop the actual formulas. Fire districts have been added to the above policy, as impact fees can be collected for fire protection facilities under RCW 82.02.050 – 100.

M. Intergovernmental Cooperation

1. The County and the cities will coordinate and cooperate throughout the comprehensive plan, development regulations and urban growth area reviews and updates undertaken pursuant to the Growth Management Act, RCW 36.70A. This coordination and cooperation will address topics including but not limited to amount and location of population, housing, and employment growth, capital facilities, transportation, climate change and community resilience. As a component of this coordination and cooperation, the County Executive may convene a Growth Management Planning Committee comprised

of elected officials from the County and the cities, representatives of the Lummi Nation and Nooksack Tribe and, where deemed appropriate, representatives from other agencies and Tribes.

Rationale for Changes: The County Executive proposed language relating to a Growth Management Planning Committee in an email of October 24, 2024. The City/County Planner Group recommended language, as shown above, to focus on coordination related to issues local governments must address under the GMA.

~~1.~~2. To adequately plan for growth and implement the policies of the Growth Management Act, the County and Cities will work with other governmental jurisdictions in Whatcom County, including the Lummi Nation, ~~and~~ Nooksack Tribe, and the Port of Bellingham, ~~shall work together~~ to establish on-going mechanisms to improve communication, information sharing and coordinated approaches to common issues and concerns~~problems~~.

Rationale for Changes: The Countywide Planning Policies do not govern the actions of the Lummi Nation, Nooksack Tribe, or Port of Bellingham. However, the Countywide Planning Policies can direct the County and cities to work with these governmental jurisdictions.

~~2.~~3. Whatcom County and the cities~~governments~~ should communicate with neighboring counties and governments in British Columbia and work cooperatively on growth management issues that cross county and national borders.

N. Water Quality and Quantity

1. The cities~~,~~ and the ~~c~~County, in coordination~~cooperation~~ with other municipal corporations, tribal governments, federal and state agencies, and public and private utilities, shall cooperate in the protection of water resources and in drawing upon said water to support growth.
2. The Cities and the County in cooperation with other municipal corporations and tribal governments shall adopt zoning regulations and development standards to protect water resources. Where there are potential conflicts with designations required by the Growth Management Act, such as natural resource lands and critical areas, water resource protection shall generally have priority.
3. Jurisdictions shall cooperate to protect and restore water resources and fish habitat within UGA's and across jurisdictional boundaries to maintain quality of life, ~~and~~ economic health, and protect treaty natural resources in Whatcom County.

4. Jurisdictions involved in the development of ground and/or surface water management plans shall pursue the adoption and implementation of the plans, as well as coordination and integration of the plans into local comprehensive plans as appropriate. Examples of such plans include the Lake Whatcom Management Plan, WRIA 1 Watershed Management Plan, Shellfish Protection District Plans and drinking water source protection plans.

5. ~~All jurisdictions should~~ To inform Growth Management Act planning efforts, water resources management should be coordinated through participation~~participate~~ in the Water Resources Inventory Area (WRIA) 1 Watershed Management Board process ~~to establish a countywide water resource management body~~ and in accordance with ~~the Watershed Management Act and other~~ applicable federal, state and local regulations ~~to inform GMA planning efforts~~.

   Rationale for Changes: The City/County Planner Group subcommittee requested that the Whatcom County Public Works Department review and provide recommendations on the above policy. The County Public Works recommended the changes above in an email dated 11/21/2022.

6. All jurisdictions shall maximize reduction of water pollutants from stormwater runoff and combined sewer overflows.

O. Fiscal Impact

1. It is recognized that if the Growth Management Act and these policies are implemented to their maximum extent, ~~c~~County government may eventually lose the tax base needed to operate essential services, including the criminal justice function and the Offices of Treasurer, Assessor, and Auditor, which serve all jurisdictions in the area. Revenue-sharing shall be addressed in inter-local agreements between Cities and the County.

P. Private Property Rights

1. As required in the Growth Management Act, private property shall not be taken for public use without just compensation having been made. It is not the purpose of this paragraph to expand or reduce the scope of private property already provided in local, state and federal law.

2. The ~~c~~County as required by Whatcom County Home Rule Charter Section 1.11, and cities should establish a pro-active process to anticipate potential takings.

Q. Review and Evaluation Program

1. The County and cities will cooperate to implement and maintain a program that meets the review and evaluation requirements of RCW 36.70A.215, unless

the Growth Management Act no longer contains these requirements or sufficient funds are not appropriated by the state.

2. The purposes of this program are to:
    a. Compare actual (achieved) development densities with planned development densities and determine whether the County and cities are achieving planned urban densities within urban growth areas and have sufficient suitable land to accommodate housing needs~~planned population~~ and planned employment growth through the remainder of the 20-year planning period.
    b. Identify and adopt reasonable measures, if necessary, to reduce the differences between actual development patterns and growth and development assumptions contained in the County comprehensive plan and/or city comprehensive plans.
3. The County, in conjunction with the cities, will develop and maintain a Review and Evaluation Program Methodology, taking into consideration the State Department of Commerce Review & Evaluation Program Buildable Lands Guidelines.
4. The County, in conjunction with the cities, will prepare, adopt, and publish a Buildable Lands Report in accordance with the timeframes set forth in the Growth Management Act.
5. The County and cities will follow the Review and Evaluation Program Methodology for the collection, monitoring, and analysis of development activity data, and comparing actual growth and development patterns with growth and development assumptions. As part of this process, the cities and County will collect data annually. The cities will provide collected data to the County upon request.
6. When the Buildable Lands Report identifies inconsistencies between actual development patterns and growth and development assumptions and targets contained in the County comprehensive plan and/or city comprehensive plans, the County and cities will discuss whether reasonable measures are necessary and appropriate to address such inconsistencies before considering adjusting urban growth areas. Each jurisdiction will individually determine whether reasonable measures are required under the Growth Management Act for their jurisdiction.
7. The County and cities will cooperate, and make every effort at the staff level, to resolve disputes regarding inconsistencies in collection and analysis of data.
8. Nothing in this policy will be construed as altering the land use power of any Whatcom County jurisdiction under established law.

R. Dispute Resolution Procedures

1. The County and cities will work cooperatively to implement the countywide planning policies. The County and cities will work together to attempt to resolve any disputes regarding implementation of the countywide planning policies.
2. In the event of an impasse, the jurisdictions involved may mutually agree to use mediation for a minimum of 90 days. After the 90 day period, the parties may, by mutual agreement, elect to utilize binding arbitration. In the event that the parties agree to use arbitration, a three member arbitration panel will be selected by mutual agreement. If the parties cannot agree on membership of the panel, each party will select one member and those two members will select the third member. The decision of the arbitration panel on the issue will be final.
3. If mediation, arbitration, or both are used, each jurisdiction will be responsible for its own legal costs, but the jurisdictions involved will split the costs of a mediator or arbitrators evenly.
4. Nothing in this policy will be construed as altering the land use power of any Whatcom County jurisdiction under established law.

S. Tribal Cultural Resources

1. The County and cities shall work individually and cooperatively with the affected tribe(s) to protect natural and cultural resources through individual and joint efforts. Opportunities for open communication and early government-to-government consultation regarding resource identification, management and protection protocols should be established.
2. Federal, state and local laws pertaining to cultural resources and human remains should be followed.
3. The County and cities should establish a clear and fair process for resolving any disagreements regarding the identification, protection, or management of tribal cultural resources. This process should involve mediation and conflict resolution techniques that respect and affirm tribal sovereignty, treaty rights and traditional practices.
4. The County and cities will work with the Washington State Department of Archaeology and Historic Preservation (DAHP) and affected tribes to identify, protect and manage historic, archaeological, and cultural sites as well as sites and structures of significance in compliance with federal, state, and local laws. Tribal cultural resources include sites, features, places, cultural landscapes, sacred places and objects with cultural value.

> Rationale for Changes: The City/County Planner Group recommends that a tribal cultural resources section be inserted in the Countywide Planning Policies to collaborate with federally recognized Indian Tribes on cultural resource protection. House Bill 1717 recently amended

countywide planning policies requirements to address the protection of tribal cultural resources (RCW 36.70A.210(3)(i)). The County invited the Lummi Nation and Nooksack Tribe to participate in and cooperate with the countywide planning policy adoption process. The Lummi Nation sent an email on January 9, 2025 with proposed changes to the Tribal Cultural Resources Countywide Planning Polies. The City/County Planner Group endorsed the Lummi Nation's proposed changes in January 2025 with minor modifications. The Nooksack Tribal Council sent an email with proposed changes on April 10, 2025.

T. Climate Change/Community Resilience

1. The County and the cities will work individually and cooperatively to limit and address impacts from climate change and increase community resilience.

   Rationale for Changes: Policy summarizes new climate planning requirements in RCW 36.70A.020.

2. As determined to be appropriate by each jurisdiction consistent with the Growth Management Act, County and city comprehensive plans will include policies to adapt to and mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resilience to climate impacts and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice.

   Rationale for Changes: Policy language is based upon RCW 36.70A.020(14), the Growth Management Act's planning goals (as amended by HB 1181 in 2023).

3. The County and cities will incorporate comprehensive plan policies to support the net zero greenhouse gas emissions target by 2050 consistent with the Washington statewide target set by the State Legislature (RCW 70A.45.020).

   Rationale for Changes: RCW 36.70A.070(9) requires certain local governments to adopt a greenhouse gas subelement that identifies actions to reduce communitywide greenhouse gas emissions. The State Department of Commerce's *Climate Element Planning Guidance - Intermediate Version* (December 2023) indicates ". . . jurisdictions should use 2022 as their emissions baseline year and set incremental targets that lead to achieving net zero emissions in 2050, consistent with Washington's statewide target . . . (p.43)."

4. The County and cities will incorporate comprehensive plan policies to address natural hazards created or aggravated by climate change, protect natural

areas to foster climate resilience, and enhance community resilience to climate impacts.

Rationale for Changes: Policy reflects requirements under RCW 36.70A.070(9) to create a resiliency subelement that identifies actions to enhance resiliency and reduce adverse impacts of climate change. The *Climate Element Planning Guidance – Intermediate Version* (December 2023) includes the three minimum requirements as listed above (p.16).

5. The County and cities will incorporate comprehensive plan policies to identify vulnerable populations and overburdened communities and address their exposure to climate impacts.

Rationale for Changes: Policy reflects requirements under 36.70A.070(9) to create policies that address impacts to "overburdened communities" and "vulnerable populations" as defined by RCW 36.70A.030.