City of Sumas
Comprehensive Land Use Plan
2025-2045

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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 qualifies 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 recreation facilities. This element is included in chapter 4, Capital Facilities
- Climate Change Element. This element establishes goals and policies …

Generally, each element first documents existing conditions and 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 referenced in the Shoreline Management element of the comprehensive plan as required by the Growth Management Act, see Chapter 10.

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 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 this 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 comments (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 re-examinations 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 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 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 designations 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 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.

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 took upwards of two years to complete. Many of Sumas'

long-time residents no longer felt safe living in such a flood-prone area and relocated away from Sumas. Those who chose to stay now live in fear of the next big flood.

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 the establishment of an interim UGA encompassing 772 acres 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 began 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 (SMP), 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 of 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 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 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 June, 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 issued 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.

Q. Do you think Sumas is heading in a good direction? (1 to 5 Scale)

- 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.

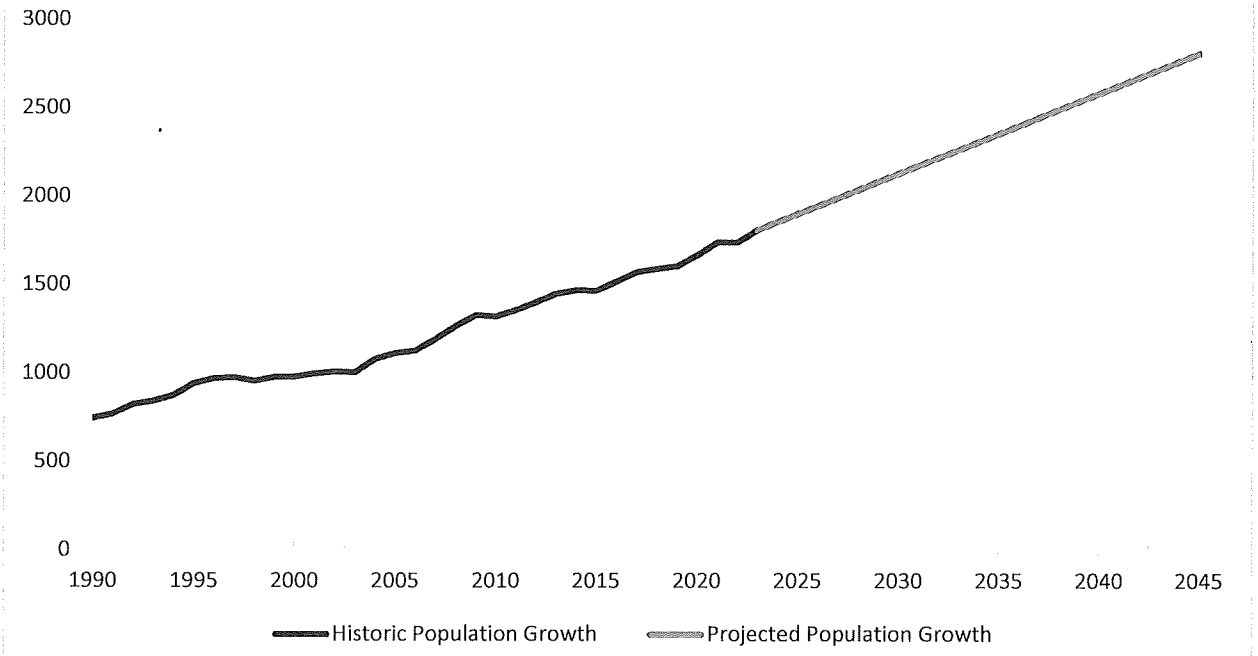
- Sumas should protect the natural elements – the clean air, pure water, and beautiful open space – that create the pastoral environment enjoyed by residents.
- Sumas should protect the residential character that is the essence of a rural town: residents should have "room to breathe," yet should still 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 goals, 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 period saw Sumas add approximately 40.4 people per year. Figure 2-1 shows how the population in Sumas has grown since 1990.

Figure 2-1: Historic and Projected Population Growth 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 in 1,052 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 respective annual increases of 32 and 21 people per year through 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 (NRSC). 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 number 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 organics chemicals (caused by pesticides). At Sumas' wells, nitrate contamination is the only concern. The May Road well produces water with 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. 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, 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 near the southeast corner of town. Another regional waterbody affecting Sumas is the Nooksack River, which flows through west through the city of Everson (eight miles to the southwest) and empties into Puget Sound. During major flood events, the Nooksack River outflows 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 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, David Evans & Associates (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 canary grass 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 steelhead and cutthroat 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 habitat for raptors, heron, waterfowl, and swans.

Flooding. Map 4 shows the location of flood-prone areas. The map shows a broad expense 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 waters then head northeast through the downtown region and across the border into Canada. Major floods occurred in 1989, 1998, 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 flood remodels must have the lowest floor at a height at least two feet higher that 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 floodplain. 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 a 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 ft 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, by 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 land owners 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. Having 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. These 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. Given the proximity of Sumas to the northern bedrock 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 not 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 habitat within an NSPA should not be adversely impacted by adjacent development.
- The habitat quality within NSPA should not 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 conducted an assessment of the fish habitat value of local streams, and Bexar Consulting updated the city's wetland inventory. The wetland and stream data was 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 function 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 land owners.

Designated NSPAs are shown on Map 5. The following site-specific discussion is linked to the number 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. This part of the creek contains good spawning habitat, according to DEA's fish habitat assessment. This 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 conversation to wetlands.
3. This 7.3-acre 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 with 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 Johnson Creek from the rail trestle behind EPL Feed 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 of 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 the 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 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

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:

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

Several structures in Sumas are listed on the Whatcom County Register of historic places, including: the Parkinson House, the Sumas Methodist Church, the Thomas House, the BB & BC Railroad Depot, the Northern Pacific Railroad Depot, and the old U.S. Border Station. None of the sites are listed in either the state or national registers of historic places, although the U.S. Border Station was determined to be eligible for listing on the state register. The county register also includes a Native American campsite adjacent to the Sumas River at the east edge of the city.

3.8 Current Land Use and Zoning

Table 3-1 contains a summary of land use within city limits as of April 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 the south and east, except for the medium-density residential zones 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%

3.8.1 Land Capacity Analysis

3.9 Future Needs

3.9.1 Sizes, and Locations of Proposed Zones

3.9.2 Neighborhood-Specific Discussion of Zoning

3.10 Long Range Land Use Plan

3.11 Open Space and Physical Activity

3.11.1 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.

3.11.2 Planning Approaches to Increase Physical Activity

Sumas has established several approaches to encourage 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 3.6: To support physical activity for the citizens of Sumas through implementation of a combination of regulatory and non-regulatory means.

- Policy 3.6.1: The City should continue to require the development of sidewalks and other pedestrian ways as part of approved subdivisions.
- Policy 3.6.2: The City should work with local property owners and developers to establish and increase pedestrian connections throughout the city.
- Policy 3.6.3: The City should utilize local zoning designations to encourage pedestrian access to commercial areas from surrounding residential areas.
- Policy 3.6.4: The City should maintain and expand access to existing park, recreation, and open space areas.
- Policy 3.6.5: The City should work in partnership with private, community

3.12 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, solid waste handling facilities, and in-patient facilities, such as substance abuse facilities, mental health facilities, 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 in 2023 whereby cities contribute to the capital cost of the facility through establishment of a countywide sales tax in exchange for the future ability to house prisoners at lower rates.

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:

3.13 Goals and Policies

Goal 3.1: 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 3.1.1: The City should establish well-defined areas within which particular land uses are planned to occur.
- Policy 3.1.2: Whenever possible, the city should avoid creating conflicts between incompatible land uses.

Goal 3.2: To encourage a mix of residential housing opportunities that can meet the needs of current and future residents.

- Policy 3.2.1: The City should establish residential areas that accommodate low-, medium-, and high-density neighborhoods.
- Policy 3.2.2: The City should encourage in-fill within existing neighborhoods.

Goal 3.3: To encourage a mix of commercial businesses that can meet the needs of both local residents and those passing through town.

- Policy 3.3.1: The City should establish centrally-located commercial areas within walking distance of most residents.
- Policy 3.3.2: The City should limit the proportion of the overall commercial area intended to serving the traveling public.

Goal 3.4: To encourage a mix of industrial businesses that can provide jobs and support the local tax base.

- Policy 3.4.1: The City should establish an industrial area that is geographically separated from residential neighborhoods.
- Policy 3.4.2: The City should encourage industrial businesses that increase employment opportunities over those that include low employment densities.

Goal 3.5: To protect the natural environment and increase recreational opportunities for local residents.

- Policy 3.5.1: The City should establish regulations to protect the functions and values of the natural environment, including wetlands, rivers, streams and other priority habitats.
- Policy 3.5.2: 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.

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. Connections 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 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 twelve 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 time that the Sumas industrial park was developed, and has 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 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 2015 was approximately 227,000 gpd, of which 110,000 gpd is attributable to a single customer – the SEI co-generation plant. Surplus capacity is about 151,000 gpd at present.

4.2.2 Future conditions

Collection.

Treatment.

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	UGA – New east-west lines from SR9 to Hovel Rd	$1,000,000	2040	DF

4.3 Water System

The City recently updated its water system comprehensive plan with the assistance of the Cascade Engineering Group. 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

4.3.2 Future conditions

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	UGA – New east-west lines from SR9 to Hovel	$1 Mil	2040	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 in Map 11.

In the northern basin, the backbone of the collection system is a 36-inch square concrete drainage line installed by the WPA approximately ninety 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 basin is 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, dick bills close 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 flaps 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 the line occasionally develops leaks, leading to cave-ins in the overlying 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 inspections 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 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

Correct deficiencies. At some point in the future, Sumas will need to address one problem identified earlier. The east end of the WPA line will ultimately need to be replaced. The city is

currently partnering with FEMA to realign the WPA line as one of our disaster recovery projects following the 2021 flood event. An estimate of the project is estimated to be roughly .

Establish new standards. According to the requirements of the Puget Sound Stormwater Plan,

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 facility was converted from an old fire station and was officially open for business in ____. 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 damages. 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 cosmetic 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 being two separate parcels. The main facility includes a four-bay garage which houses crew members' personal 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 northeast 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. However, flood waters backed up by the nearby railroad berm were close to overtopping the property. In 2024 and 2025, an additional 4,200 square foot shop was built on the property. The shop will provide addition storage space the Public Works Department that is above flood level. The shop will be utilized as local base of operations during a flood event, and serve as an alternate location for administrative staff if City Hall were to ever get flooded again.

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 4-5. 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 more than capacity to handle Sumas' sewage, was willing to accept and a connection between the Sumas and Abbotsford sewer systems was constructed in 2008.

4.5.8 Future Public Properties/Buildings Projects

Below is a table outlining potential projects for public properties and buildings that the City anticipates completing during the coming planning period.

Table 4-6. Public Properties/Buildings 20-Year Capital Improvement Plan

Project #	Project Description, Location and Type	Cost	Year	Funding Source
1				

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 4-4. 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 that 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 is two-story 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 4-7. 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 4-8. 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 4-9. 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 complete 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 perform 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 to implementation.
- November, 2000. Final draft chapter 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 at 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 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 and the museum, creating a nice gathering space for events. In 2024, the basketball courts were 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 was 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 house 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 square-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, a playground 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 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. Sumas itself has a population of 1,830, but Sumas is also the major service provider to an unincorporated rural community with an estimated population of 2,500

(based upon the number of rural route customers served by the Sumas Post Office) and encompassing about 35 square miles. For a service population of nearly 4,000 people, planning standards would therefore call for about 10 acres of community park and 6 acres of neighborhood park. In comparison, Sumas has about 35 total acres of park that can variously be thought of as either neighborhood or community park (i.e., 2.3 acre city park, 0.5 acre city park north, 9 acre rodeo grounds, 20 acre new ball fields, 0.8 acre sycamore park). In addition, the city's facilities are supplemented by the fields and playground associated with the Sumas Elementary School. The school places limits upon what use may be made of its athletic field.

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 4-10. 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 Street subdivisions with the rest of town (2 responses).
- A neighborhood playground is needed at the new Garfield Street subdivisions (3 responses).
- A sidewalk is needed on Mitchell Street heading east from the school to Victoria Street.
- 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 playgrounds 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 possible.

4.8.4 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
    - Objective 4.4.1: Provide pedestrian access from major neighborhoods to the downtown core.
    - Objective 4.4.2: Provide pedestrian access to major public facilities such as schools, churches, and libraries.
    - Objective 4.4.3: Provide pedestrian access to the rodeo grounds and new ball fields.
    - Objective 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.
    - Objective 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.

- Objective 4.6.1: Continue to assess the need for additional community facilities to serve city residents and the surrounding area.
- Objective 4.6.2: Allow access to City recreational programs and facilities to serve city residents and the surrounding area.

- Goal 4.7: When economically feasible, provide facilities and events targeted to the County and the region.
  - Objective 4.7.1: Continue to provide a facility for rodeo events.
  - Objective 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.
  - Objective 4.8.1: Continue to provide a senior center facility and program.
  - Objective 4.8.2: Continue to provide a historical museum facility.
  - Objective 4.8.3: Work with local groups and organizations to facilitate the restarting of the youth program to be run out of the Sumas Community Center.
  - Objective 4.8.4: Maintain existing facilities such as the basketball and tennis courts that are used by people of all ages.
  - Objective 4.8.5: Develop a trail system for recreational walkers.

4.8.5 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. Sidewalk, civic auditorium, and conversion of the rodeo ground to an alternate use. The following matrix shows the results of the feasibility exercise.

Table 4-11. Parks and Recreation Project 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	M	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, N)	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, mis. Leagues	Lynden Y, Bellingham, Abbotsford	Sumas, Lynden, Everson	-	Bellingham	Saxon

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 need 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 Street, separated from the street by curbing or by a grass strip. $15,000
    - *Western lowland loop.* A loop can almost be 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 tennis/basketball courts. The major expense would be associated with staff, but the fees charger 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 website, 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 & soccer fields.** Construction of the new ball fields was completed in 2007. This facility includes two baseball fields (four baseball diamonds) and one soccer field.
- **Skateboard park.** Few opportunities are available in the region for the many youth who like to skateboard. Most local cities view the use of skateboards on streets and sidewalks as a hazard and have enacted ordinances prohibiting such use. Owners of private parking lots have also typically prohibited use of their facilities by skateboarders. The new facility in Bellingham is 45 minutes distant by car, and most skateboarders are too young to drive. A facility in Sumas would accommodate local youth, but also serve a wider region including Everson, Nooksack, Lynden, and Abbotsford. The cost of a facility would be $100,000 to $300,000, depending on the size and complexity. Grant funding would need to be obtained to support development of a skateboard park.
- **BMX park.** Similar to the skateboard situation, there are few dedicated facilities for BMX riders in the region. Riders have built makeshift trails on both private and public parcels. A dedicated facility would attract riders from throughout the region and could be the site of races and events. Size and cost of such a facility are unknown at this time. Grant funding would likely be necessary to obtain.
- **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 swim 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 demand on this fund, use of these funds will likely be quite limited.
- Capital facilities fund. This fund receives revenue from the Real-state Excise Tax and has gradually built to a fund balance of about $255,000.
- 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 maintain 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 the 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, in partnership with Whatcom County and the City, prepared a capital facilities plan that was adopted in 2025 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 23 vehicles, including fire engines, tenders, aid cars, and other vehicles.

4.10.2 Future conditions

4.11 Green Infrastructure

4.12 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 six 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 2016 through 2021. The spreadsheets are based on the 2015 year-end results. The dozens of line items in the accounting system are consolidated into a few major categories. Fore 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 subcontracting annual expenditure from actual annual revenue (i.e., ignoring the balance brought forward from a prior year).

The 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 source 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 incline over the coming six years. These inclines are due in part to the city's ability to allocate 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, while the sewer fund shows a more substantial decline over the same 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 spreadsheet shows a strong increase in revenue over the six-year period. This increase is due to the strong electricity rates that the City charges.

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 the previous six. 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 roughly $800,000.

Table 4-6. 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	3,328,389	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	

			2024	2025	2026	2027	2028	2029	6-Yr Total
520's	**Public Safety**								
521	PD Salaries & Benefits	2.0%	977,346	997,402	1,017,350	1,037,693	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%	254,000	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	12,245	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 Environment**								
554-558	Operations & maintenance	2.0%	26,073	26,595	27,127	27,669	28,222	28,787	
560's	**Social Services**								
566	2% LPI Substance Abuse Treatment	2.0%	564	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**	**2,603,937**	**2,675,206**	
Annual operating results			-53,013	-73,664	-111,545	-149,856	-188,301	-226,986	-803,466
Cumulative balance			3,514,199	3,440,535	3,328,989	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		482,385	496,857	510,311	523,268	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%	33,348	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									

			2024	2025	2026	2027	2028	2029	6-Yr Total
530's	**Utilities**								
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**	

		2024	2025	2026	2027	2028	2029	6-Yr Total
Sewer culmative balance		-273	-39,788	-67,224	-98,936	-135,531	-177,704	-519,455
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

			2024	2025	2026	2027	2028	2029	6-Yr Total
Revenue									
	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	

			2024	2025	2026	2027	2028	2029	6-Yr Total
533	Renewable Energy Incentive (DeBont - Solar)	0.0%	55	55	55	55	55	55	
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 Environment**								
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	

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 1,835 in 2024, to 2,810 in the year 2045.
- The number of persons per household is 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 building permit records, and the Whatcom County Housing Authority data.

5.2.1 2020 Census data

Amount and type of housing. According to the 2020 U.S. Census, the city of Sumas had 523 housing units within city limits, of which 340 were detached single-family residences, 13 were attached single-family residences, 34 were mobile homes, RVs, or trailers, and 136 were multi-family residences. Comparing the 2010 U.S. Census data to the 2020, there was an increase of 36 detached single-family residences, an increase of 38 multi-family residences, and a decrease of 31 mobile homes, RVs, or trailers. Based on the 2020 U.S. Census, 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 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
2014 or later	39	7.8%
2010-2013	37	7.4%
2000-2009	80	15.9%
1980-1999	64	12.7%
1960-1979	124	24.7%
1940-1959	37	7.3%
1939 or earlier	122	24.2%
Total	503	100.0%

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

Condition of housing stock. The 2020 US Census 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 503 occupied units, 369 (73 percent) were owner-occupied and 134 (27 percent) were renter-occupied. 281 (76 percent) of the owner-occupied homes were mortgaged and 88 (24 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	0	0.0%
50,000 - 99,999	5	1.8%
100,000 - 299,999	217	77.2%
300,000 - 499,999	54	19.2%
> 500,000	5	1.8%
Total	281	100.0%

Source: 2020 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%	209	27	236	46.9%
20 - 29%	79	20	99	19.7%
> 30%	73	85	158	31.4%
Zero Income	5	--	5	1.0%
Not computed	3	2	5	1.0%
Total	369	134	503	100.0%

Source: 2020 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, 20 percent of *owners* live in unaffordable housing (i.e., 73 out of 369). 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: 63 percent of renters live in unaffordable housing (i.e., 85 out of 134). Overall, 31 percent of the community lives in unaffordable housing, which is slightly lower 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 $57,930 in Sumas, so a "very low" income household would be one with an income less than 50 percent of that amount, or less than $28,965, 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 an increase in Very Low, Low and Moderate income since the 2010 Census, which showed 44 percent of households in those categories, as compared to 54 percent in the year 2020.

Table 5-4. Households By Income Group

HUD Definition of Income Brackets		Corresponding $ in Sumas	# Households	Fraction of Total
Very Low	< 50% of median	< $28,965	95	18.9%
Low	50 - 80% median	$28,965 - $46,344	107	21.3%
Moderate	80 - 95% of median	$46,344 - $55,034	70	13.9%
Middle/High	> 95% of median	> $55,034	231	45.9%
Total			503	100.0%

Source: 2020 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 trailer 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 $___ yields an amount somewhat higher than the overall median of $305,700 reported in the 2020 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 project 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 persons. 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 under the Whatcom County Housing Authority's sponsorship, but is now privately owner. Rents are established based upon monthly income.
- *Two HUD-owned homes.* HUD owns two homes that are available for rent by eligible low-income families.
- *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.

Section 8 vouchers and certificates are available in Whatcom county. There are approximately 19 families in the Sumas zip code area involved in Section 8 programs, of which an unknown number live within city limits.

5.2.4 Summary

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

- Census data reveals a large proportion of Sumas residents are Very Low, Low, and Moderate income, according to HUD standards. The proportion of people within those categories increased, however, with 82 percent of residents now falling into those categories as of 2020.
- Housing with 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 relies upon an assumption that the relative economic condition of residents will remain constant (i.e., that the same proportion of people will be low income over time). The table shows that Sumas will accommodate about 643 new households, of which 429 will consist of Low- or Very Low-income people.

Availability of sufficient land. As described in Chapter 3. Available infill sites in combination with the established UGA do not provide enough land to accommodate 643 new housing units, including a market factor of over __ percent. The most effective way to provide adequate land for new housing units is to expand the established UGA to areas that will provide suitable buildable land to meet the demand.

Provision of 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. However, the unavailability of suitable land within city limits will requires Sumas to expand its UGAs to surrounding areas.

5.4 Goals and Policies

Sumas adopts the following goals and policies pertaining to housing:

Goal 5.1: Support healthy residential neighborhoods that reflect a high degree of pride in one's home.

- 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.

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, providing 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

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 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 and safe 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 and prioritize diverting industrial/commercial truck traffic to the alternate route during times of border-related backups.
    - 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.

- 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 ration 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 closely with Whatcom Transportation Authority (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: 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. The results of the community surveys in 1992 and 2023 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 through 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

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 title "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.

6.2.3.5 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 identifyinf 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.

6.2.3.6 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.
2.
3.

Needs

1.
2.
3.
4.

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 principle 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 some comparison, using projected future traffic volume, yields insight on future levels of service.

HB1181 amended state regulations related to LOS so that jurisdiction are required t

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 City of Sumas Six-Year Transportation Improvement Program: 2025-2030

The city has secured non-local funding for three of the above projects: Garfield Street Crack Seal, Sumas Avenue Rebuild and Hovel Road Bridge Construction. The city has not secured non-local funding for any other projects listed above; therefore, those projects will be prioritized based on the city's success in securing non-local funding and the availability of the required level of local funding. Two of the projects identified as having non-local funding sources are federally funded. The Hovel Road Bridge Construction project is being funded by FEMA as part of the rebuild 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

6.3 Existing Conditions

6.3.1 Basic Transportation System

State Route 9 (Cherry Street), State Route 547 (Rock Road), and the Burlington Northern Railroad form the regionally significant elements of the city's transportation system. SR 9 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, Garfield Street, Jones Road, 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 bench marks 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.

RCW 35.78.010 and RCW 47.26.180 require local jurisdictions to adopt a street classification system consistent with state and federal requirements. RCW 35.78.010 identifies the classification system and definitions by which cities are to classify the street system. RCW 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 arterials roadway classifications within the city. Cherry Street and Front Street are classified as arterial streets.

6.3.3 Access Control Classification

RCW 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 the 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 of 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 4 highways typically post speed limits between 35 and 45 mph, with intersections spaced a minimum 0.5 miles apart. Driveways are generally required to be at least 250 feet apart. Bother classes allow a high level of vehicle access and typically have fairly low speed limits.

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 congestions 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 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, 2013

The road with 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 Avenue and the east-west streets north of Johnson Creek that connect Railroad Street, Cherry Street, and Sumas Avenue.

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 businesses 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, 2013

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 excellent or good 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: Excellent, Very-Good; Good; Fair-Poor; and Unknown. Excellent and Very-Good are pavements that are new with no cracks deflections, or utility cut repair patches. Good pavements are somewhat older in age with a relatively few amounts of cracks, utility cut repair patches, or deflections. Pavements rated in Good condition had some cracks, utility cut repair patches, pavement may be raveling, and street edges may be beginning to break up. Fair-Poor street pavements had a large number of cracks, or utility cut repair patches. Fair-Poor pavements also had a large amount of the surface breaking up from the edges to centerline. Streets needing repair based on Fair-Poor include:

The streets in Fair-Poor condition experience relatively small amounts of traffic, so it is not critical to make immediate repairs to these facilities.

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

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

	Reportable		Non-Reportable		
Street	Injury	Non-Injury	Non-Injury	Other	Total
Cherry (SR 9)	3	4	3	1	11
Front Street	0	2	3	2	7

Garfield Street	0	1	0	1	2
Sumas Avenue	0	0	0	0	0
Bob Mitchell	0	1	0	0	1

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 travelling to Bellingham, one route is through Sumas along SR 9, connecting then with SR 546 (Badger Road), SR 544 (Pole Road), or SR 543 (Mt. Baker Highway).

Total passenger vehicle crossings in 2024 were down by about 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 total 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. That 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 a 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 Transportation, Bureau of Transportation Statistics estimated that goods valued at roughly $4.5 billion 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 not 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 service was cancelled. The service has now been reopened.

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 access to the system. The system would provide access to Vancouver, B.C., Skagit County, Sea-Tac Airport, Olympia, Vancouver, WA, and Portland, Oregon. Construction of the high-speed rail system may also provide city residents 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 select Canadian cities (e.g., Calgary, Edmonton, Toronto) and connect flights to resort destinations (e.g., Guadalajara, Cancun). In Whatcom County, the nearest airport is the Lynden Municipal Airport, primarily used by private aircraft and charters. The 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 (SR 547) 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 work force begin their commute before 6:00 a.m. About 45 percent of the commuters left home between 6:00 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 Demand Management Strategies and Commute Assistance

Currently, WTA offers Monday through Saturday demand response services to the general public. Users of the service phone WTA and ask for service at a particular time and pick-up point. WTA then transports the person to a location where fixed-route service is available to connect to Bellingham and other points in Whatcom County. WTA also offers van-pool service in Sumas.

6.3.14 Public Transit

The WTA provides fixed route public transit service to the City of Sumas. The 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.

6.3.15 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.

6.3.16 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 a 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 the 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.

6.3.17 Pedestrian Facilities

Access to sidewalks provides 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 vehicle section will be receiving a major expansion.

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 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 northbound queuing areas have been proposed as part of the expansion project, but the construction period will heavily restrict traffic flow and cause an artificially inflated congestion 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 the queue lengths experienced at a given time. 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 375 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 road.

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

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 Congestions for Streets in the Regional System, 2045

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 2045. The 2045 results of the WCOG model are 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. The 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 marking, 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. Steet 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:
    a. Require more space than is physically available; or
    b. Be located where both current and future demand is proven absent; or
    c. Drastically increase project costs and equivalent alternatives exist within close proximity; or
    d. 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.
    e. 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 this 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 group 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 and 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 through a Northwest Pipeline Corporation transmission on 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, 5 industrial).

7.1.2 Future Conditions

Future expansion is based on economic feasibility. Cascade Natural Gas' 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

7.2.1 Existing Conditions

7.2.2 Future Conditions

7.3 Telecommunications

7.3.1 Existing Conditions

7.3.2 Future Conditions

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 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 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 and the proximity to Canada are 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 country, both in terms of automobile and truck traffic as well as 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 in 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.

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 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.

8.1.3 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 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 sever 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

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 that 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 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 occupied 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 as 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 could

U.S. Border Patrol.

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 impact for potential. 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 does identify wildfire as having an exposure area of 17.5%.

9.1.4 Comparison of Assets and Hazards

9.1.4.1 Ecological Assets

Urban Tree Canopy.

9.1.5 Climate Hazard Priorities

9.2 Existing Plan Review

9.2.1 2016 Comprehensive Plan

9.2.1.1 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*. 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 hazard 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 needs and issues 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 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, , 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 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.

9.5 Consistence With Shoreline Management Plan

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 to the Sumas Shoreline Master Program (SMP) on October 23, 2023 through adoption of Ordinance No. 1806. Final approval from the Washington Department of Ecology is currently pending; however, the goals and policies as adopted by the Sumas city council have been included in the 2016 update of the comprehensive plan.