3 ~~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 ~~on~~ in Map 1B, Sumas is a small city encompassing just ~~924~~ 935 acres of land. A major border crossing is located in town, so several transportation facilities terminate at Sumas, including SR9 and a Burlington Northern railroad line. The surrounding terrain consists primarily of gently sloping land in the Sumas River basin. At the north of town is a knoll known as Moe's Hill, site of the city's water reservoir. Map 1A also shows that higher ground is located 1.5 miles west of town. These uplands stretch extensively to the west and northwest and consist of sand and gravel deposited by outwash during episodes of glaciation.

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

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

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

At the west of town are areas of soil number 116 (Pangborn) and 144 (Shalcar/Fishtrap). These are mucky soils that have limited usefulness for either farming or building. To support buildings, the muck must be excavated or the buildings must be constructed on pilings.

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

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

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

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

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

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

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

The report provides detailed recommendations about kinds of habitat enhancement needed along the various reaches of the local streams. The recommendations are summarized on Map 3. Despite the degraded condition of the habitat, all the local creeks still function as habitat for anadromous fish. The Sumas River has 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 expanse of floodplain ("Special Flood Hazard Area" on Map 4) extending throughout much of the town. The floodplain is a result of flooding of the Nooksack River eight miles to the south. Given the prevailing northward slope, any overflow of the Nooksack heads north to Canada. Floods reach Sumas from the southwest along the path of Johnson Creek and are funneled toward town by the

two railroad lines extending to the south and southwest. The elevated embankments function as dikes that control the path of the flood. Flood water then heads northeast through the downtown region and across the border into Canada. Major floods occurred in 1989 ~~and~~, 1990, 2020, and 2021, with water reaching a depth of five and a half feet downtown.

3.2 Critical Areas and Resource Lands

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

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

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

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

categories. Generally, 50-foot buffers are required, but development is permitted provided a mitigation plan is followed.

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

The codes also establish buffers adjacent to streams. Buffer widths vary according to the shoreline environment designations. In urban environments, buffers range in size from 10 to over 100 feet. In the conservancy environment, an upland buffer of 100 feet applies. For both stream and wetland buffers, the codes allow averaging of buffer widths and also allow reductions in buffer widths if 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. Habitat conservation is accomplished via the wetland and stream provisions of the SMP and the CAO, coupled with the Natural System Protection Area overlay zone. See the discussion of Natural System Protection Areas below.

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

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

The CAO contains provisions specific to geologic hazards. Because the entire region is thought to be seismically active, most of western Washington is mapped as seismic zone 3 within the

International Building Code (IBC), and stricter standards are therefore already applicable. It is not known whether more stringent standards should be enacted locally, given the proximity of the two bedrock faults. In the normal course of events, the IBC will eventually be updated to reflect any greater danger proven to exist along the faults. Meanwhile, if larger jurisdictions such as Bellingham, Whatcom County, and the City of Abbotsford, B.C., adopt stricter standards because of the new evidence, Sumas should consider following suit.

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

3.3 Natural System Protection Areas

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

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

In order to provide the science-based data needed to identify the existing value of habitat and the potential for habitat enhancement, Sumas commissioned two studies. DEA 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 numbered areas on that map:

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

swathe along the left bank of the creek; and all of the right bank of the creek north of Front Street and west of the rail line; and the forested portion of the right bank south of Front Street; but exclusive of the Front Street right-of-way.– This creek reach is identified as quality fish habitat within DEA's assessment.– The reach should be preserved and enhanced.– Possible enhancements include planting 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 area contains a forested wetland associated with an old oxbow of the Sumas River.– The oxbow is no longer continuous with the river, but it does offer significant habitat value to water fowl.– The oxbow wetland should be preserved.

3.4 Green Spaces and Community Forests

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

3.5 Environmental Justice

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

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

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

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

3.6 Wildfire Protection

Sumas' location in a valley with little tree cover makes risk from wildfires significantly lower than in other communities. The International Code Council's Wildland Urban Interface (WUI) lists Sumas 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.~~Sumas does not have any structures listed on the state or national registers of historic places. However, the Knight Barn located at the intersection of Rock Road and Swartwood Road is on listed on the Washington State Heritage Barn Register. Although there are no structures listed on the State or National registers, there are certain structures that maintain unofficial historical status within the City.

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

~~Goals and Policies~~

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

~~Goal: 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.~~

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

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

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

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

- ~~The city should establish centrally located commercial areas within waling distance of most residents.~~
- ~~The city should limit the proportion of the overall commercial area intended to serving the traveling public.~~

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

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

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

- ~~The city should establish regulations to protect the functions and values of the natural environment, including wetlands, rivers, streams and other priority habitats.~~
- ~~The city should develop and maintain parks and other recreational amenities to serve local residents.~~

3.8 Current Land Use and Zoning

Table 3-1 contains a summary of land use within the city limits as of October 2015.~~–~~ 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	~~129~~224	~~14~~24%
Multifamily residential	10	1%
Mobile homes	~~15~~5	~~2~~1%
Commercial	~~42~~17	~~5~~2%
Industrial	~~81~~202	~~9~~22%
Public and quasi-public	~~89~~69	~~9~~7%
Agricultural	~~258~~77	~~2~~8%
Vacant	~~149~~174	~~16~~19%
Rights-of-way	~~161~~157	17%
Total	935	100%

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

Table 3-2: Current Zoning (City limits)

~~Zoning Designation~~	~~Acreage~~	~~Percentage~~
~~Res – High density. A residential zone with minimum lot size of 6,000 sf. Multi-family units conditionally permitted.~~	~~193~~	~~21%~~
~~Res – Medium density. A single-family residential zone with minimum lot size of 7,200 sf.~~	~~112~~	~~12%~~
~~Res – Low density. A residential zone with minimum lot size of 10,890 sf.~~	~~48~~	~~6%~~
~~Agriculture. A zone containing agricultural use, accessory activities permitted.~~	~~100~~	~~11%~~
~~Business District – Traffic. A commercial zone that serves the needs of travelers. Motels, restaurants, convenience stores permitted. Retail, office, gas stations, and other businesses conditionally permitted.~~	~~17~~	~~17%~~
~~Business District – General. A commercial zone that provides day-to-day goods and services to residents.~~	~~50~~	~~5%~~
~~Business District – Low-impact. A commercial zone containing businesses that generate little traffic and that typically cater to the needs of residents. Residential use also permitted.~~	~~4~~	~~<1%~~
~~Industrial. A zone containing light manufacturing, warehousing, wholesale, and selected retail businesses. Heavy manufacturing permitted as a conditional use.~~	~~376~~	~~40%~~
~~Mini-warehouse. A zone containing warehouses suitable for individual storage.~~	~~2~~	~~<1%~~
~~RV Park. A zone containing recreational vehicle parks.~~	~~6~~	~~1%~~
~~Public~~	~~29~~	~~3%~~
~~Total~~	~~935~~	~~100%~~

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%

3.9 Land ~~capacity~~ Capacity ~~analysis~~Analysis

This section presents an analysis of the supply of land available to accommodate growth within the existing city limits and urban growth area. The land capacity analysis detailed methodology utilized to complete this analysis was developed by county planning staff working in collaboration with planners from the seven cities. The analysis starts with the gross acreage in each zone, then eliminates those parcels that are fully developed. Acreage within each parcel that is likely to be undevelopable due to the presence of critical areas, such as wetlands and flood corridors, are then subtracted. Additional reductions in developable acreage are then applied based on factors such as infrastructure needs and market factors. The resulting acreage is referred to as net developable acreage. This net acreage is then converted to population and employment growth capacities using factors that include assumed residential densities, occupancy rates, average persons per dwelling unit, floor area ratios and employment densities. The results of the land capacity analysis are presented in Table 3-3, which shows that the current city limits and UGA have a population growth capacity of ~~884~~ 308 persons and an employment growth capacity of ~~460~~ 219 jobs.

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

Use Category	Total Acreage	Net Developable Acreage	Population Growth Capacity	Employment Growth Capacity
All residential zones	~~338~~118	~~81~~23	~~947~~308	0
All commercial zones	~~79~~43	~~12~~11	~~-49~~0	~~169~~131
All industrial zones	~~666~~202	~~107~~33	~~-14~~0	~~291~~88
Totals	~~750~~363	~~200~~67	~~884~~242	~~460~~219

Source: County Land Capacity Analysis, ~~2015~~2025.

3.10 Future Needs

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

Residential.– In computing the demand for residential land, a value of ~~2.89~~2.82 persons per household is used for the Residential, Low and Residential, Medium zones and a value of ~~2.21~~1.82 persons per household is used for the Residential, High-Density zone, matching the ~~Office of Financial Management average household size in 2015~~U.S. Census Bureau's American Community Survey from 2023.– Assumed densities of 3.0, ~~4.0~~4.5 and ~~7.0~~10.0 dwelling units per net developable acre are used for the Residential, Low, Residential, Medium and Residential, High-Density zoning districts, respectively.

The population projection in Chapter 2 anticipates that a total of ~~855~~ 1,000 newcomers must be accommodated in the period between ~~2015~~ 2023 and ~~2036~~2045.– At an average of ~~2.7~~3.13 persons per household and an occupancy rate of ~~94.5~~92 percent, the newcomers can be accommodated in ~~335~~ 294 households.

The city's Floodplain Management Plan calls for the creation of two Special Flood Corridors that will traverse existing residential areas.– The locations of the corridors are shown on Map 4. These corridors are intended for conversion to open space in order to provide conveyance channels that will then reduce flood impacts in the remaining parts of town.– There are ~~51~~ 47 existing homes located within the corridors.– To accommodate the relocation of these residents, the city's land supply would need to be increased by this amount; however, the conversion of these areas to open space has not been incorporated into the land capacity analysis at this time, but should be revisited during future updates.

The land capacity analysis results revealed that ~~884~~ 242 persons can be accommodated in the current city limits and UGA.– This capacity is not sufficient to accommodate the population growth allocation identified in chapter 2. To remedy this, the City has expanded the boundaries of its UGA for the purpose of expanding Sumas City Limits to accommodate additional growth in the future.~~; however, should changed circumstances lead to a need for additional residential~~

~~capacity, the 40-acre UGA Reserve located on the west side of Hovel Road would be the most likely area to be added to the UGA.~~

Commercial.~~–~~ Relative to its size, Sumas contains a large traffic-oriented business sector, and residents see little need for more retail development that caters solely to passers-through. However, residents describe a need for commercial development oriented toward local customers (e.g., florist, hairdresser, dentist), but also dependent on Canadian traffic. 7.6 acres south of Front Street were rezoned in 1998 in order to create a location for the desired retail development. ~~Since that time, a three-acre parcel within this area has been purchased by Fire District14 and is planned as the future site for a new fire station.~~ In addition, a Business-General zone has been established north of Front Street between Cherry Street and Sumas Avenue that could be converted from residential to commercial use over time to meet this type of need.

Truck traffic volumes at the Sumas port of entry have ~~climbed steadily throughout the past ten years, even at a time when automobile crossings have declined~~dramatically decreased as a result of the closing of Land Ports of Entry (LPOEs) to all but essential workers as a response to the deadly Coronavirus Pandemic. Prior to the Pandemic, Sumas saw a~~A~~n average of 500-600 trucks per ~~week~~day ~~now~~ head south through Sumas~~., and this volume is projected to grow to 800 per day in the year 2021.~~ In 2023, that number was reduced to roughly 390 trucks per day. This, however, is a major improvement to the conditions of border crossings as the closure was lifted. ~~The realignment of SR9 has directed even more trucks to Sumas.~~ ~~Sumas~~ Despite the recent decline in crossings, the City still believes that Sumas is a reasonable location for a large truck plaza, including a gas station, restaurant, washrooms, mechanic bays, and parking areas.~~–~~ Such a facility has a footprint of about 20 acres, and there is no parcel of that size available within town adjacent to the highway.~~–~~ Such a plaza would need to be located in the UGA.

According to the land capacity analysis, the combined city and UGA includes capacity to support approximately ~~169~~ 550 new jobs. This is ~~more than~~ enough capacity to accommodate the 500 commercial jobs anticipated over the planning period.

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

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

The land capacity results indicate that the city's industrial area has a capacity sufficient to accommodate approximately ~~291~~ 88 jobs over the planning period. The city is planning on needing to accommodate ~~395~~ 450 new industrial jobs through ~~2036~~2045; therefore, at some point the city will need to consider either shifting lands from commercial to industrial or working with the county to expand the Sumas industrial area. The most likely expansion area would be to the west of Barbo Road adjacent to Halverstick Road.

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

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

Overall demand. The Sumas UGA designated by Whatcom County in 2009 and maintained in 2016 no longer contains enough acreage to meet ~~Sumas's~~Sumas' needs. If residential development ~~does not meet planned densities, then a portion of the UGA Reserve west of Hovel Road may need to be added to the UGA before the end of the planning period.~~continues to expand, then Sumas will soon run out of room for any more residential and commercial growth. The same goes for the Industrial District. Given that the city ~~is~~ had already showing insufficient industrial land to meet anticipated demand ~~through 2036~~since 2016, additional land may need to be added to the UGA. ~~The timing of any such expansion will depend largely on how quickly the existing industrial land base gets developed.~~

3.11 Sizes, and locations of proposed zones

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

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

~~Zoning Designation~~	~~1.5.1.1~~	~~UGA (acres)~~	~~Total (acres)~~	~~Percentage~~

	~~(acres)~~			
~~Res – High density~~	~~177~~		~~177~~	~~18%~~
~~Res – Medium density~~	~~108~~		~~108~~	~~11%~~
~~Res – Low density~~	~~48~~		~~48~~	~~5%~~
~~Open Space/Agriculture~~	~~88~~		~~88~~	~~9%~~
~~Business District – Traffic~~	~~17~~	~~26~~	~~43~~	~~5%~~
~~Business District – General~~	~~49~~		~~49~~	~~5%~~
~~Business District – Low-impact~~	~~4~~		~~4~~	~~< 1%~~
~~Industrial~~	~~384~~		~~384~~	~~40%~~
~~Mini-warehouse~~	~~2~~		~~2~~	~~< 1%~~
~~RV Park~~	~~5~~		~~5~~	~~< 1%~~
~~Public~~	~~52~~		~~52~~	~~5%~~
~~Total~~	~~935~~	~~26~~	~~960~~	~~100%~~
Zoning Designation	City (acres)	UGA (acres)	Total (acres)	Percentage
Residential, High Density	171	0	171	9.7%
Residential, Medium Density	158	444	602	34.1%
Business, General	45	0	45	2.5%
Business, Traffic-Oriented	18	60	78	4.4%
Business, Low Impact	4	0	4	0.2%
Industrial	377	132	509	28.8%
Open Space/Agriculture	100	180	280	15.8%
Public	60	11	71	4.0%
RV Park	5	0	5	0.3%
Mini-Warehouse	2	0	2	0.1%
Total	940	827	1767	100.0%

Map 8 also shows the city's UGA Reserve. Prior to 2009, this approximately 78-acre area was included in the city's UGA. In 2009, the County Council shifted this area into Reserve based in part on concerns that were raised related to potential impacts from sediments from Swift Creek that contain naturally occurring asbestos. This area is planned for future residential development, and the city anticipates that the area will need to be shifted back into UGA status during the next major update of the comprehensive plan.

~~1.6~~3.12 Neighborhood-specific discussion of zoning

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

1) *Residential ~~panhandle~~ area north of Kneuman Rd.*~~–~~ This 110-acre area is now zoned Open

Space/Agricultureal and, Low-, Medium-Density Residential., and High-Density Residential. The area includes a ridge of high ground extending west from Moe's Hill.– The ridge is partially forested and in certain places slopes so steeply as to make development unlikely. Good views are obtained from the crest of the ridge.
At the south base of the ridge, the area includes wetlands and peat soil and is partially within the flood plain.– Sumas Creek flows along the south boundary of the area, in the Kneuman Road ditch.– The city's main potable well field is located at the far western end of this area, and the zone of contribution to the wells includes much of the area west of Barbo Rd.– A major water line runs along the north edge of the area from the well field to the reservoir. Open Space/Agricultural zoning remains appropriate in the area closest to the well field. Residential zoning continues to be appropriate for the remainder.– Along the high ridge, Medium-Density zoning will remain.– On the low ground, the Low-Density zoningdespite the transition to Medium-Density zoning, the existing area adjacent to Barbo Road will remain as critical areas in recognition of environmental limitations (peat soils, wetlands, and floodplain) and the character of the neighboring uses. (i.e., Agricultural land to the south and west, and Low-Density Residential land further to the east).

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

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

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

continue in this area.– Environmental constraints limit development in some of the area, but other portions are capable of supporting major industrial facilities.

4) ~~*Panhandle*~~ *Area south of city limits.*– This 148-acre area includes approximately 82 acres that ~~has~~ have been annexed into the city, with the remainder zoned Agricultural in the county and ~~is~~ in active farm use.– Part of the area annexed into the city was utilized to develop the new ball fields~~,~~ and a 48-lot residential subdivision ~~was recently approved~~ just south of Bone Creek adjacent to Hovel Road. Of the remaining acreage, 25.8 acres adjacent to SR9 are within the UGA and 40 acres adjacent to Hovel Road are designated UGA Reserve by the county. The area ~~exists in~~consists of large parcels and is largely protected from flooding by the railroad embankment and state highway running along the west boundary.– The culverts beneath the railroad are the path by which Nooksack flood waters reach this area, and only 20 percent of the area is contained within the 100-year flood-plain. This area contains the largest chunk of ~~non-flood~~non-flood-prone land contiguous to Sumas.– The area is served by Hovel Road, which is classified by the county as a local road, but which carries much north-south traffic to town.– The B-N main line and SR9 run along the west boundary of this area.– The realigned SR9 is a limited access highway, and it is only possible to access it via widely separated, intersecting streets or driveways.– The backbone street network within this ~~panhandle~~ area should therefore be east-west streets connecting Hovel Road to SR9. Provision of sewer service should not be problematic because of the new lift station that was constructed in conjunction with the new ball fields.– Main water lines already extend south along Hovel Road and SR9.– East-west loop connections between these lines are needed to provide service within the ~~panhandle~~area.– Public zoning is proposed in the area occupied by the new ball fields.– Medium-Density Residential zoning is proposed for the remainder of the area, with the exception of a 25.8 acre parcel ~~at the southwest corner of the panhandle~~. Given its frontage upon the new highway, this parcel is recognized as a viable location for a large, full-service truck stop.– If the entire parcel can be developed for this purpose by a single owner, the development would be consistent with this plan. ~~No other commercial use of the parcel is supported, and the~~ The parcel should otherwise be developed as Medium Density Residential land. An 8-inch high-pressure gas line traverses the area, and the intent of City is that residential lots be prohibited within 50 feet of the gas line easement.

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

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

7) *South commercial zone between Cherry Street and Sumas Avenue.*– ~~The General Business zoning in this area will be retained to support development of businesses other than gas stations, which are allowed in the Traffic-Oriented Business zone. This area provides a viable alternative location for businesses serving the local population that prefer to avoid potential~~

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

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

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

~~a. *Business-General parcel west of B-N main line.* This pocket of Business-General zoning west of the Burlington-Northern main line is proposed to be rezoned to Industrial in order to match the surrounding zoning. The parcel contains an auto repair shop, which is a use proposed to be added as a permitted use in the Industrial zone at the same time the rezoning would be approved.~~

~~b. *Residential, High-Density parcels west of Sumas Avenue.* A few small parcels lying on the west side of Sumas Avenue north of Front Street are currently zoned Residential, High-Density, but are surrounded by Business, General zoning. Business, General zoning is proposed, except for the parcel owned by the city, which is proposed to be rezoned to Public zoning.~~

~~c.~~b. *Agricultural parcel north of Johnson Creek.*~~–~~ This Agricultural parcel is located south of the go-kart track, adjacent to the Industrial zone. Johnson Creek runs through the parcel. The portion of the parcel north of the creek is proposed to be rezoned to Industrial to allow development on the area not limited by the shoreline setback and the special flood risk zone.

~~d. *Agricultural parcel adjacent to Sumas wellfield.* This parcel is located north of Kneuman Road adjacent to the City wellfield. It is owned by the city; therefore; Public zoning is proposed.~~

~~e. *New ball fields.* When the area planned for the new ball fields was annexed, the exact location of the new ball fields was not known. Therefore, the entire annexed area was zoned Residential, Medium-Density. The property containing the new ball fields that is owned by the city is proposed to be rezoned to Public.~~

~~f.~~c. ~~*Hovel Estates Subdivision.* The Hovel Estates Subdivision received preliminary plat approval in 2015. This development includes two parcels, with the northern parcel being zoned high-density and the southern parcel being zoned medium-density. All of the lots in the subdivision are larger than 8,000 square feet and the property owner is planning on building single-family homes. The zoning on the~~

~~northern parcel is proposed to be changed to Residential, Medium-Density.~~

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

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

3.13 Long-Range Land Use Plan

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

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

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

proposed for commercial use, although the eastern extents of those two parcels may be converted to residential use if the entire parcel is not taken up by the commercial use.

~~B) *Rural development south of Rock Road, east of city limits.* This 18-acre area contains an 8-unit mobile home park and three hobby farms, all dependent upon septic systems. It is now zoned Agricultural in the county, but contains development that is more appropriately described as rural – i.e., 11 housing units in an 18-acre area. It is likely that eventual replacement or rehabilitation of the septic systems will be problematic because of the clay soils. The City's 1997 flood modeling revealed that much of the area is either outside the floodplain, or subject to very shallow inundation. In a prior plan version, Sumas had proposed inclusion of the area in the UGA, but inclusion was not supported by Whatcom County. If landowners eventually pursue annexation because of sewer problems, Sumas is willing to accept this area. To make extension of the sewer economically feasible, a larger area than this must be residentially developed. An acceptable area would be the triangular wedge of land bounded by Rock Road, the Sumas River, and the center line of section 35.~~

c) ~~C)~~ *Sumas Industrial District ~~UGA~~.* Map 6B shows a ~~seemingly adequate~~ number of "Vacant" industrial parcels. However, ~~there is enormous interest in industrial development in Sumas at this time, primarily because of the softwood tariff. Canadian firms are relocating wood remanufacturing facilities to the U.S. in order to import low-value raw materials and add value here, thereby avoiding high tariffs. There are preliminary plans for remanufacturing facilities that would consume two of the parcels identified on Map 6B. It is very possible that all sites will be developed within a 10-year horizon~~several of these larger parcels that are ready for development are owned by land owners who have so far been unwilling to sell and/or develop the land, leaving it vacant and devoid of use. If this trend does not change soon, Sumas will have to find other areas for industrial development to occur.

~~If additional industrial development is to eventually occur, the 39-acre parcel west of Barbo Road and north of Halverstick is the most logical site. It contains rail frontage and is also served by the City's main electric and water lines on Barbo Road. It is underlain by reasonable soils and is predominantly out of the floodplain. The land owner desires to be included in the Sumas UGA.~~

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

There are two major barriers to the City's proposed expansion of its UGA boundaries. The first major barrier is the GMA requirement that UGA boundaries cannot be expanded into areas located within the 100-year floodplain. There are a few exceptions to this

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

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

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

3.14 Open Space and Physical Activity

Open space

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

Map 12 shows the expected locations of open space within the city and surrounding area. The

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

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

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

Planning approaches to increase physical activity

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

- Requiring the construction of sidewalks within all new subdivisions
- Planning for interconnections between neighborhoods
- Planning for a compact urban commercial area, including establishment of areas where provision of off-street parking is not required
- Establishing higher density residential areas at locations surrounding the downtown commercial core and along the major transit route through town
- Maintaining existing park facilities that include ball fields, tennis and basketball courts, play structures, walking trails and open space
- Maintaining public access to Johnson Creek to accommodate fishing and other water-related recreational activities
- Planning for and developing additional park, recreation, trail and open space facilities
- Securing easements for public access to off-street pedestrian trails

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

Policy 3.1.1: The city should continue to require the development of sidewalks and other pedestrian ways as part of approved subdivisions.

Policy 3.1.2: The city should work with local property owners and developers to establish and increase pedestrian connections throughout the city.

Policy 3.1.3: The city should utilize local zoning designations to encourage pedestrian access to commercial areas from surrounding residential areas.

Policy 3.1.4: The city should maintain and expand access to existing park, recreation and open space areas.

Policy 3.1.5: The city should work in partnership with private, community groups and

state and local funding agencies to develop additional park and recreation facilities.

3.15 Essential Public Facilities

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

A major public facility of regional significance that is currently under consideration is the proposed construction of new jail facilities within Whatcom County. ~~The County has proposed~~The voters passed a funding mechanism 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. This mechanism is conceptually acceptable to the City of Sumas, but has not yet been approved by voters.~~

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

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

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

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

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

3.16 Goals and Policies

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

Goal 3.3: To encourage a land use pattern that supports a balance between residential,

commercial and industrial development while protecting and enhancing the natural environment and quality of life enjoyed by local residents.

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

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

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

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

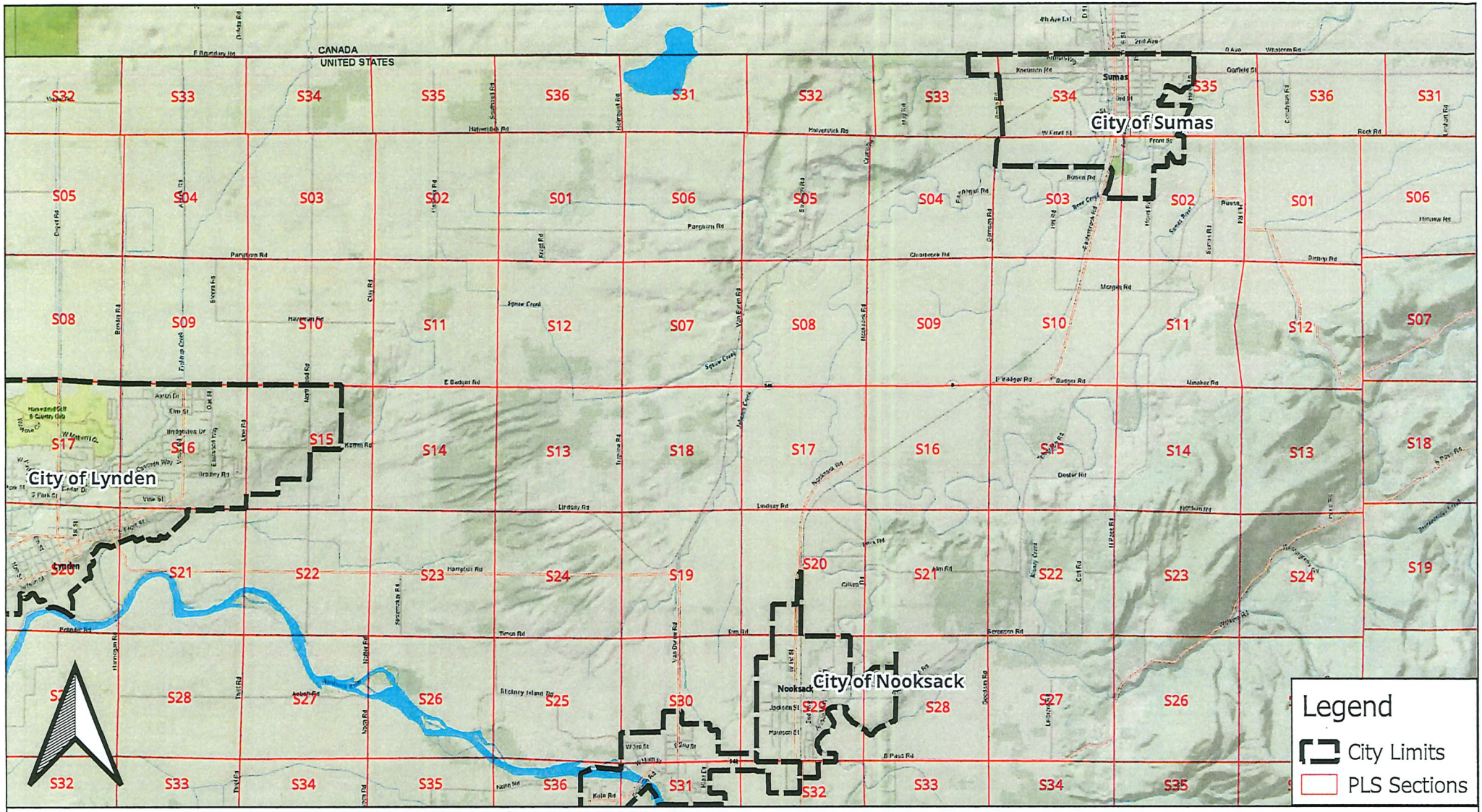
- Policy 3.5.1: The city should establish centrally located commercial areas within walking distance of most residents.
- Policy 3.5.2: The city should limit the proportion of the overall commercial area intended to serv~~inge~~ the traveling public.

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

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

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

- Policy 3.7.1: The city should establish regulations to protect the functions and values of the natural environment, including wetlands, rivers, streams and other priority habitats.
- Policy 3.7.2: The city should develop and maintain parks and other recreational amenities to serve local residents.



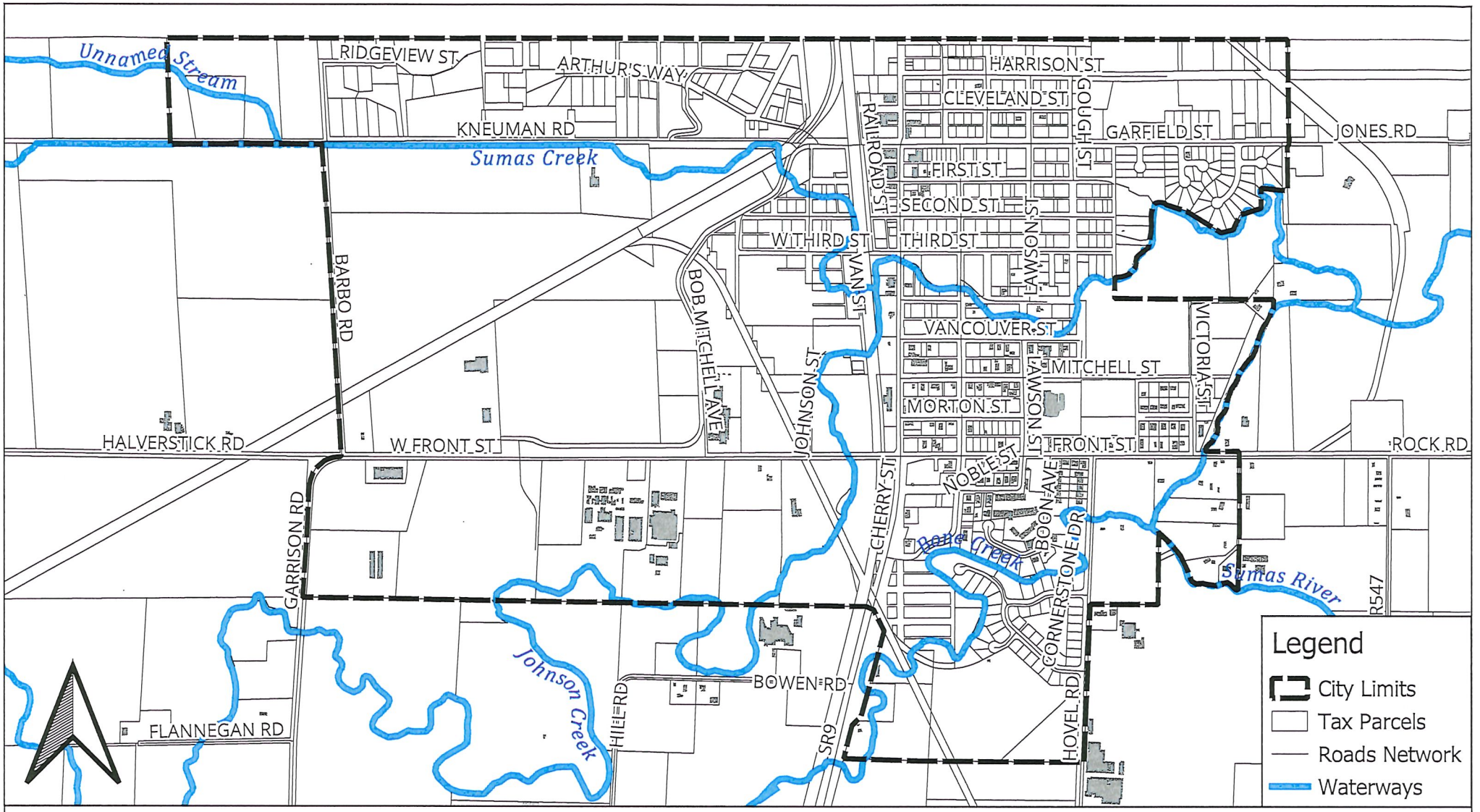
City of Sumas, WA
Map 1A
Environs

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

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

CITY OF SUMAS
A GREAT PLACE TO LIVE AND DO BUSINESS

Date: August 11, 2025



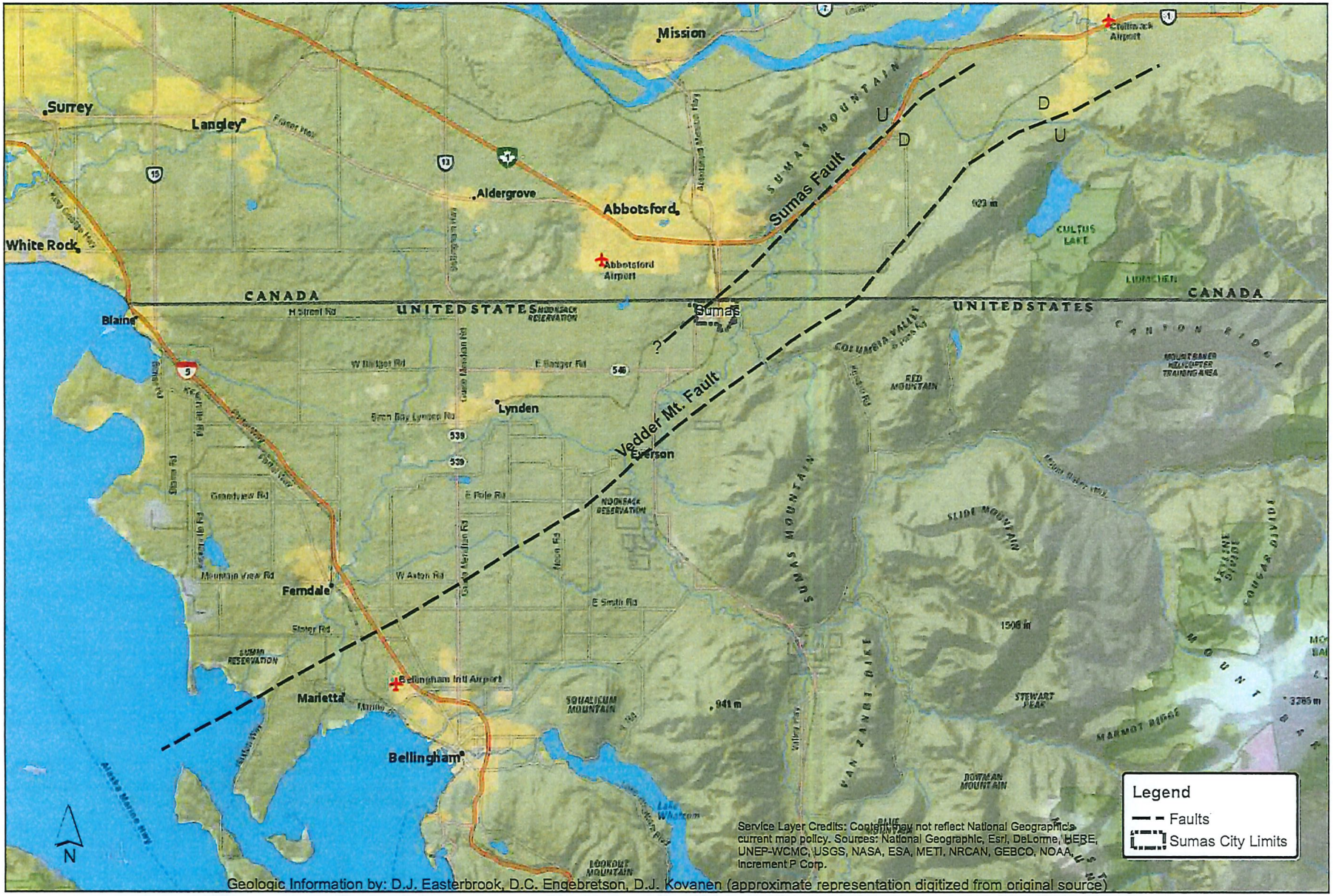
City of Sumas, WA
Map 1A
Environs

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

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

CITY OF SUMAS
A GREAT PLACE TO LIVE AND DO BUSINESS

Date: August 11, 2025



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

1 inch = 5 mile

0 2.5 5 7.5 10 Miles

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

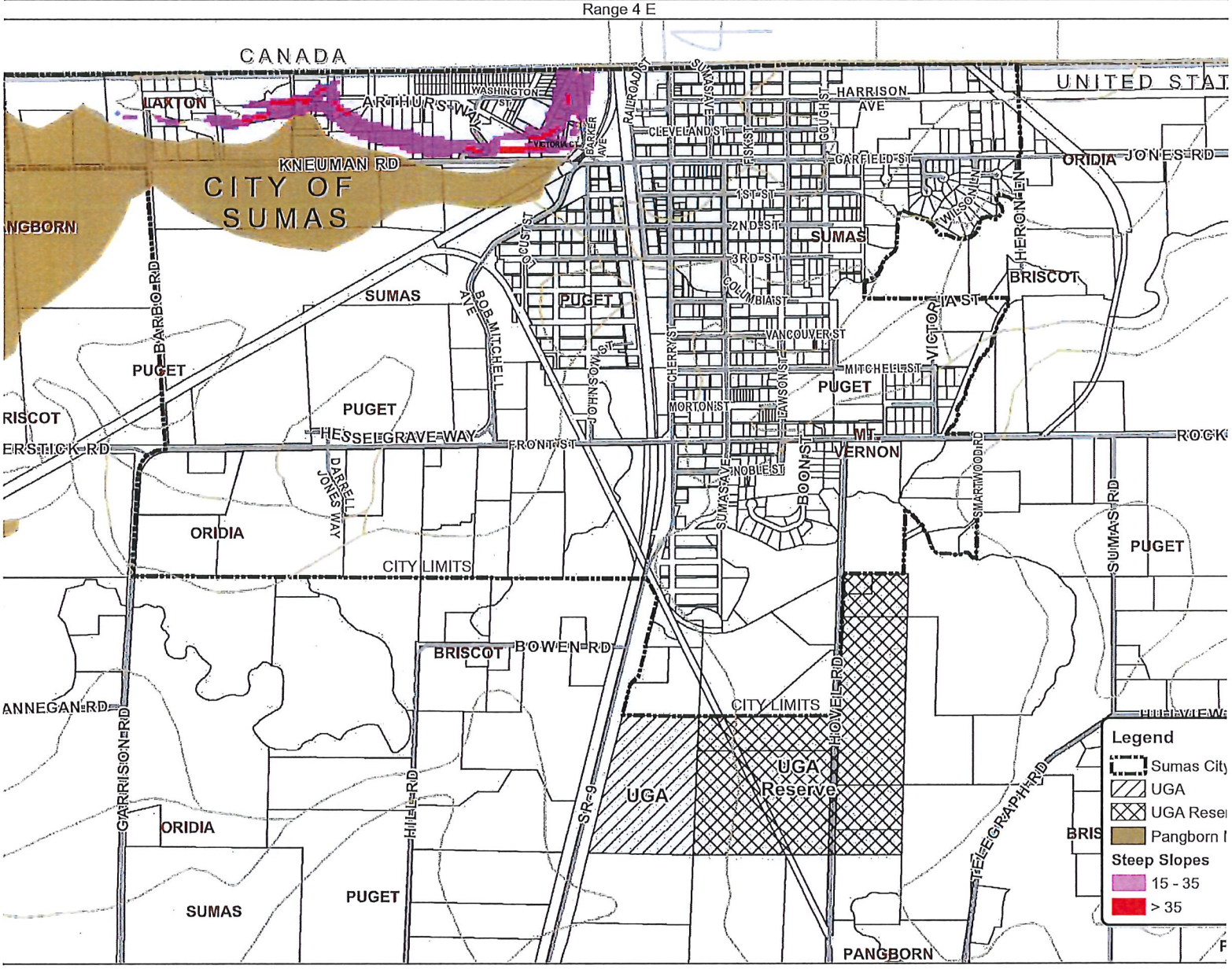
CITY OF SUMAS, WA
MAP 2A
SUMAS - VEDDER MT FAULTS

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

WELCOME TO SUMAS

Date: June, 2016

Range 4 E



1 inch = 0.25 miles

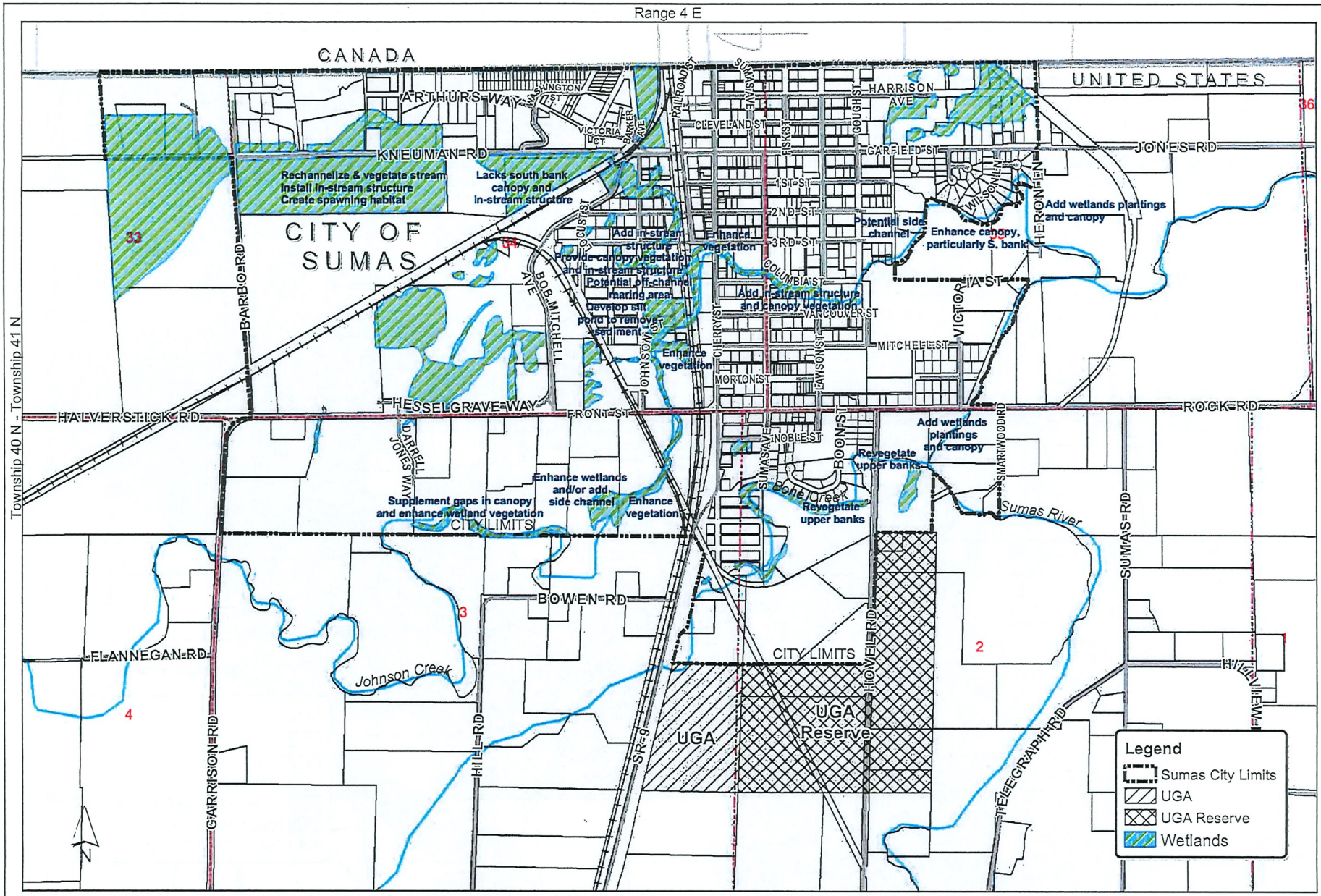
0.2 0.3 0.4 0.5 Miles

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

CITY OF SUMAS, WA
MAP 2B
SOILS AND STEEP SLOPES

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

WELCOME TO SUMAS



1 inch = 0.25 miles

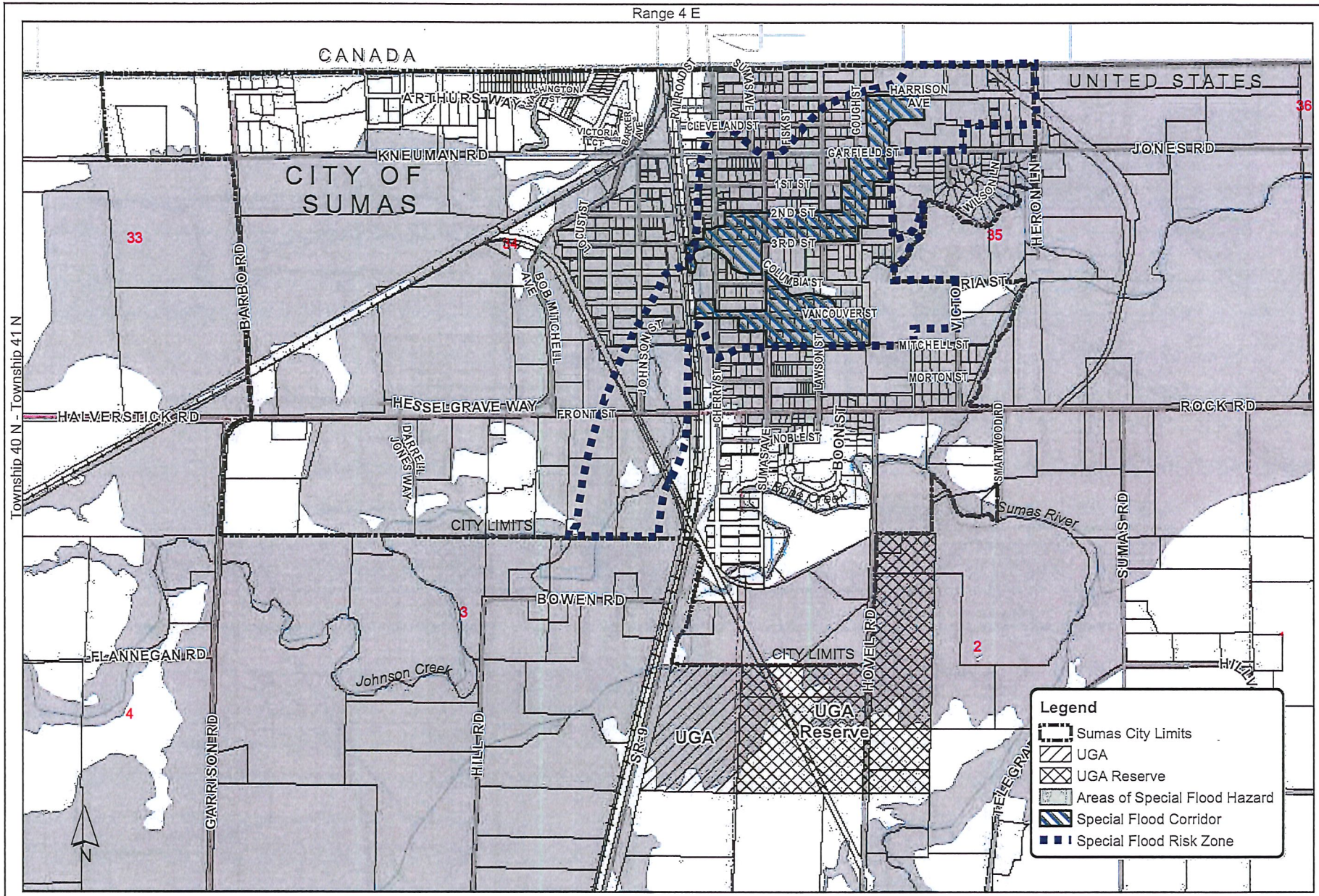
0 0.1 0.2 0.3 0.4 0.5 Miles

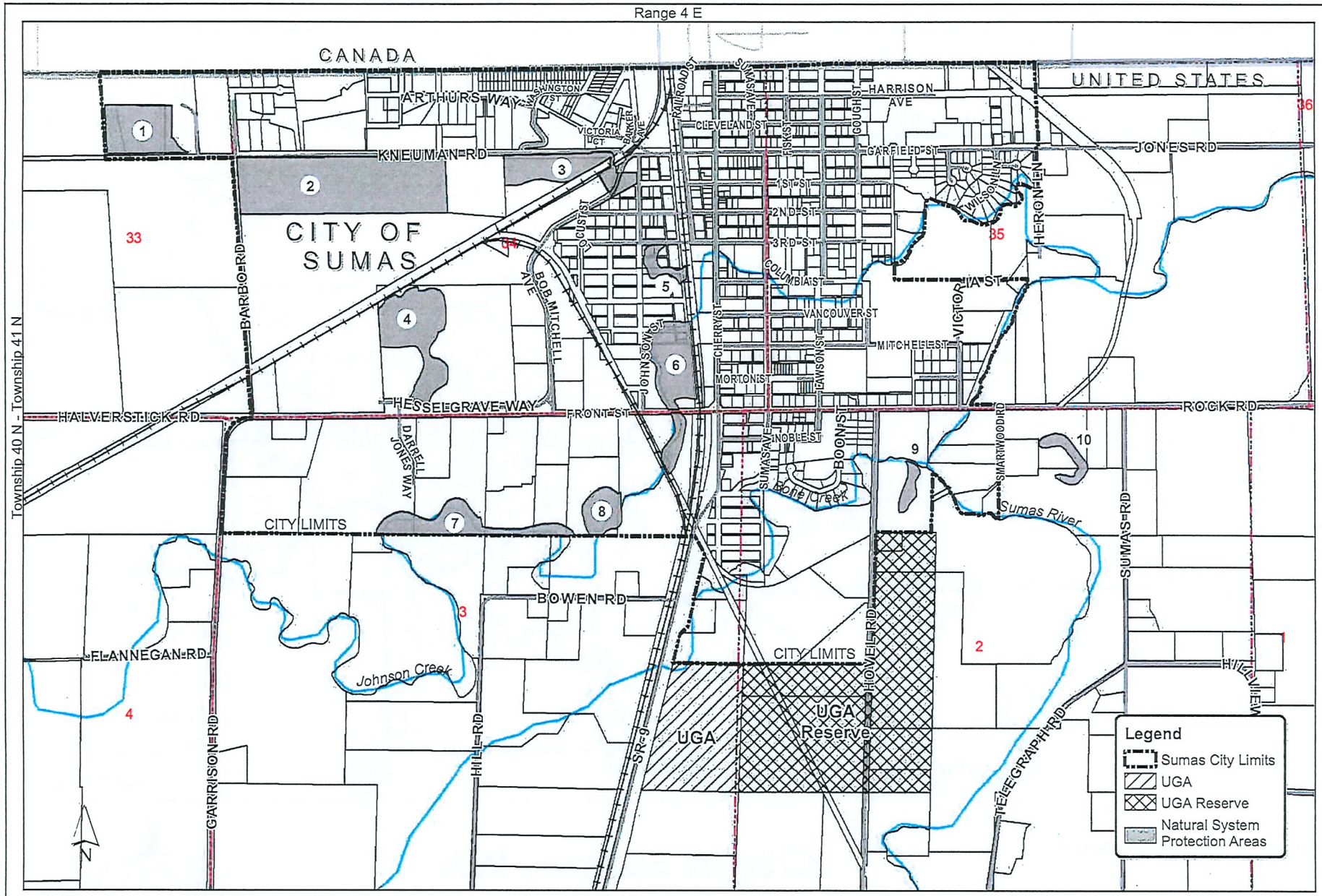
PROJECTION:
UTM Zone 10 North
NAD 27
SCALE: 1:15,840

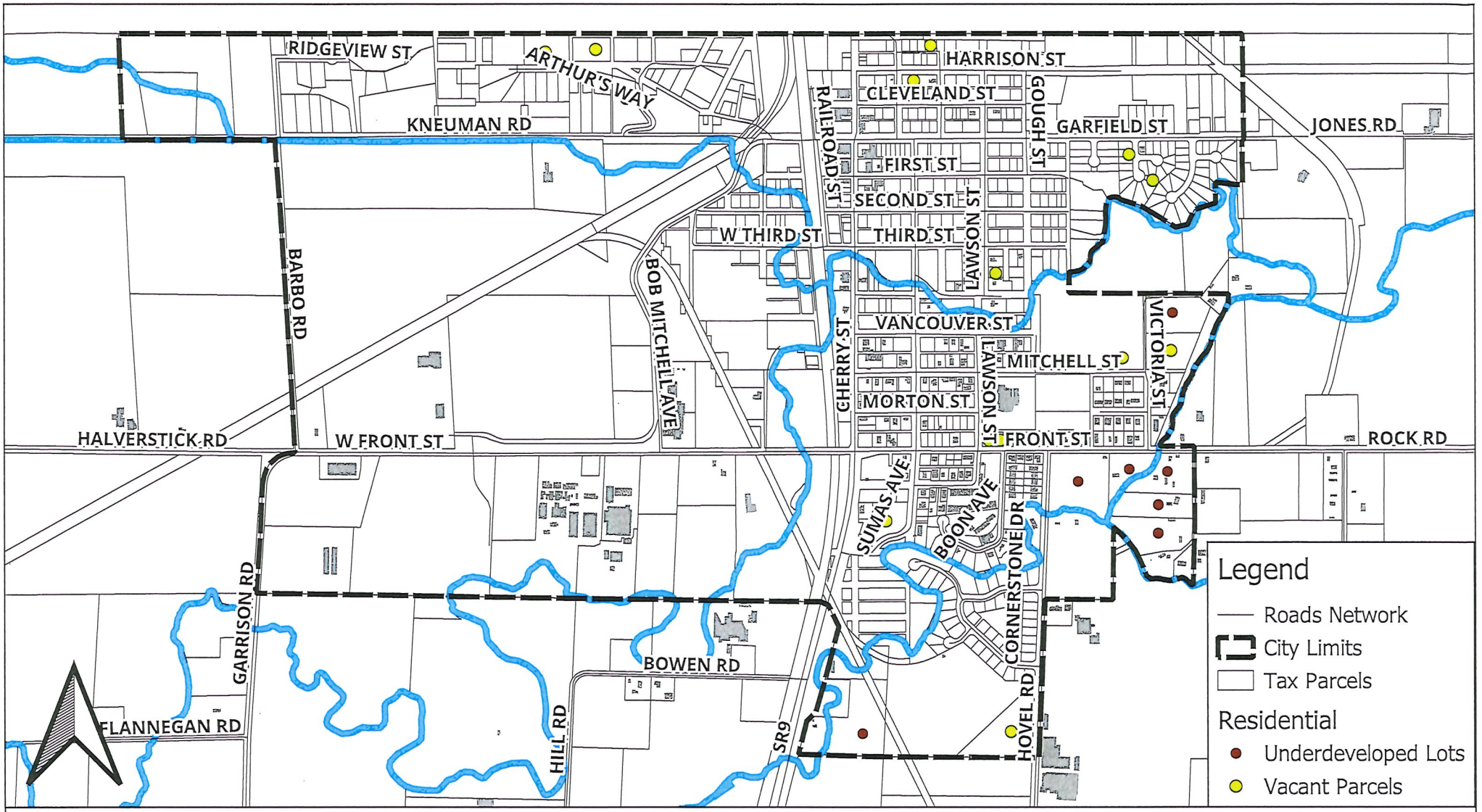
CITY OF SUMAS, WA
MAP 3 WETLANDS/POSSIBLE STREAM ENHANCEMENTS

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

Date: June, 2016


Range 4 E
Township 40 N - Township 41 N
CANADA
UNITED STATES
CITY OF SUMAS
ARTHURS WAY
KNEUMAN RD
HARRISON AVE
CLEVELAND ST
GARFIELD ST
1ST ST
2ND ST
3RD ST
COLUMBIA ST
VANCOUVER ST
MITCHELL ST
MORTON ST
JONES RD
HERON LN
WILSON LN
VICTORIA ST
BARBO RD
BOB MITCHELL AVE
JOHNSON ST
HESSELGRAVE WAY
FRONT ST
HALVERSTICK RD
ROCK RD
DARRELL JONES WAY
CHERRY ST
NOBLE ST
BOON ST
SMARTWOOD RD
SUMAS AVE
Sumas River
SUMAS RD
CITY LIMITS
BOWEN RD
FLANNEGAN RD
Johnson Creek
HOVEL RD
GARRISON RD
HILL RD
SR 9
UGA
UGA Reserve
Legend
Sumas City Limits
UGA
UGA Reserve
Areas of Special Flood Hazard
Special Flood Corridor
Special Flood Risk Zone
1 inch = 0.25 miles
Miles
0 0.1 0.2 0.3 0.4 0.5
PROJECTION:
UTM Zone 10 North
NAD 27
SCALE: 1:15,840
CITY OF SUMAS, WA
MAP 4
FLOOD ZONES
DATA SOURCES:
Whatcom County Assessor's Office & Planning Department, and the City of Sumas
WELCOME TO SUMAS
Date: June, 2016


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

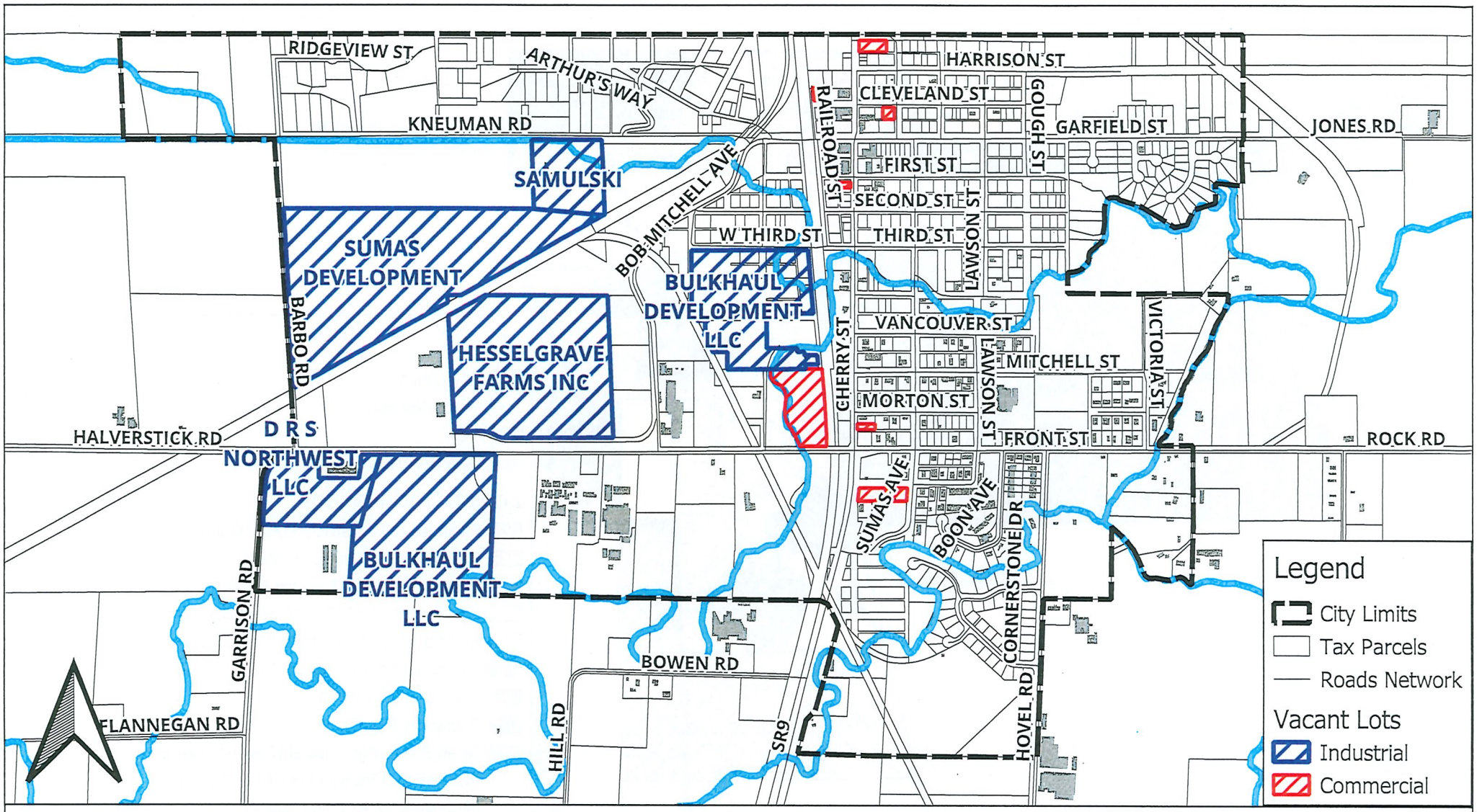


City of Sumas, WA
Figure 6A - Infill Potential
Residential

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

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

CITY OF SUMAS
A GREAT PLACE TO LIVE AND DO BUSINESS



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

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

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

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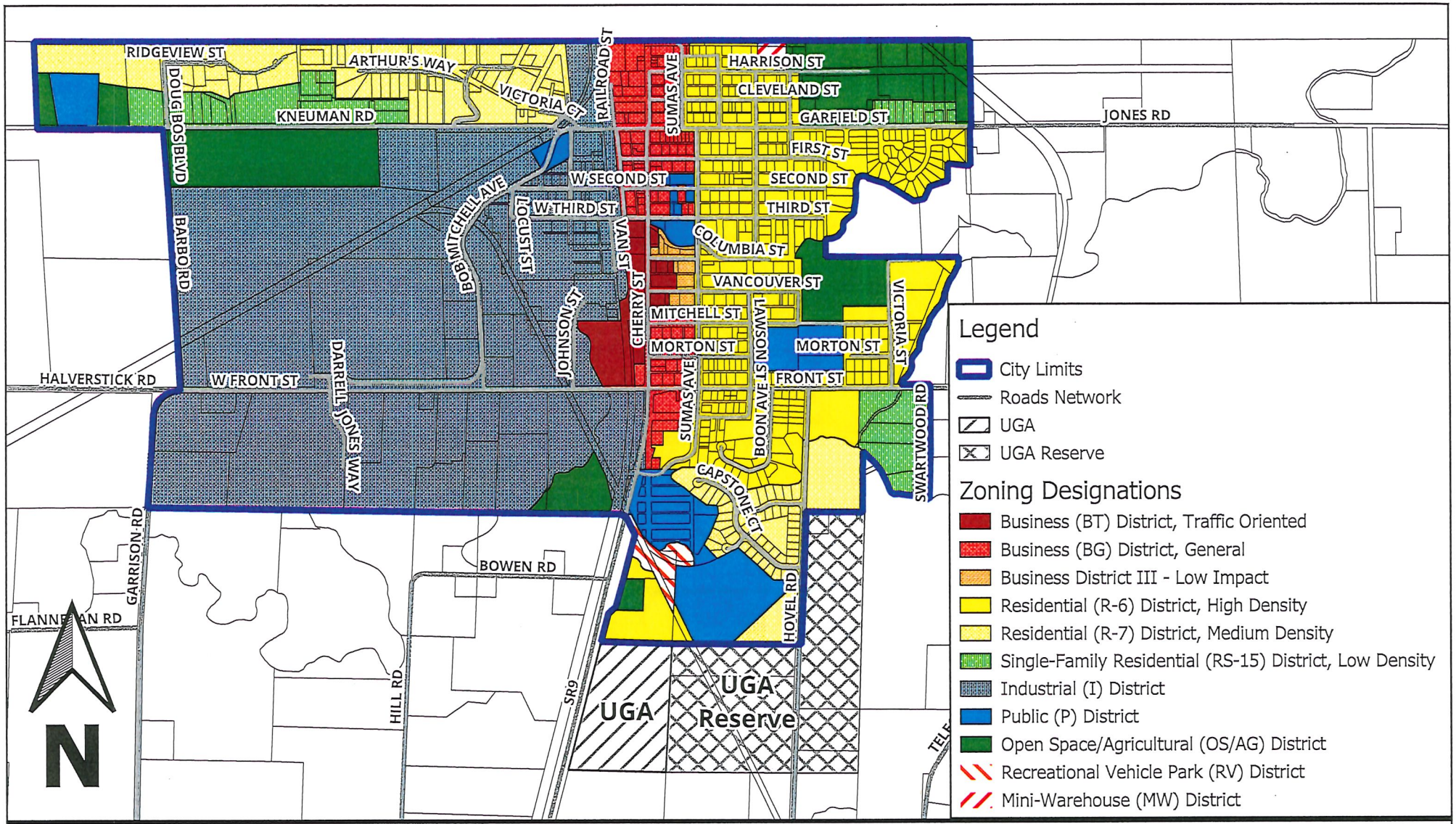

0 1,000 2,000 ft

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

City of Sumas, WA
Map 7
Current Zoning

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

CITY OF SUMAS
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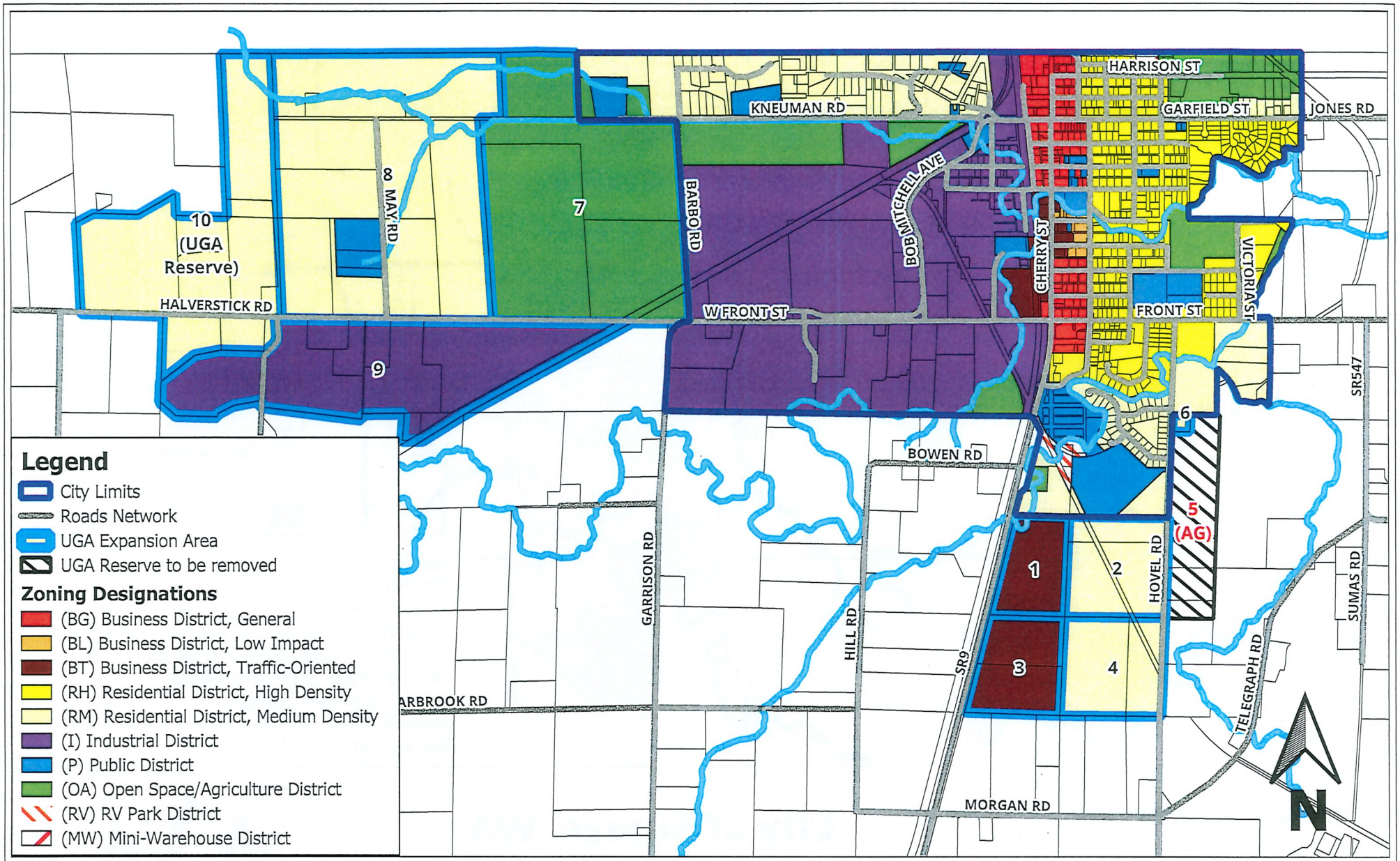
Date: August 11, 2025



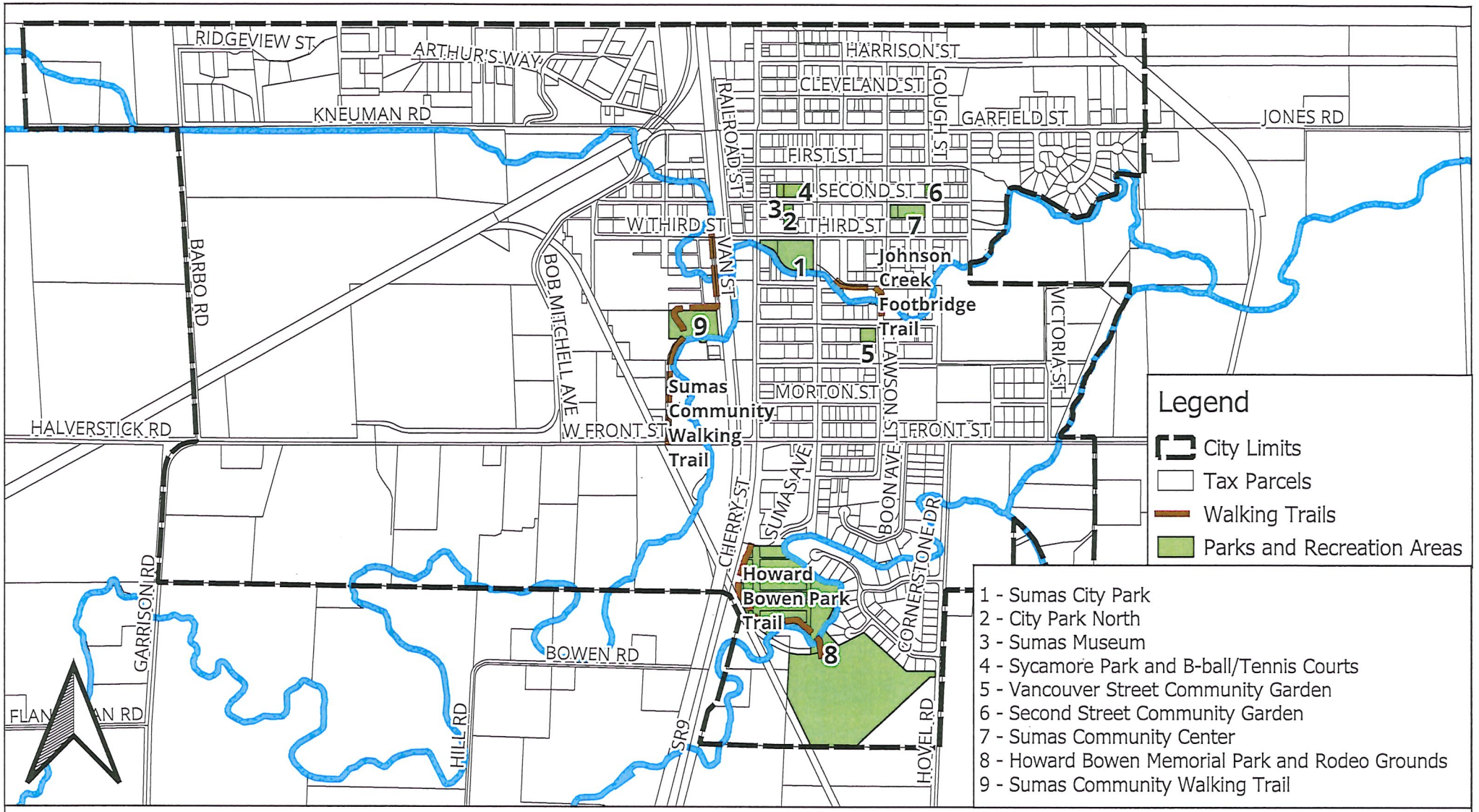
PROJECTION:
UTM Zone 10 North
NAD 27
1:30,000

CITY OF SUMAS, WA
MAP 8
FUTURE ZONING

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

CITY OF SUMAS
A GREAT PLACE TO LIVE AND DO BUSINESS

Date: August 11, 2025



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

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

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

CITY OF SUMAS
A GREAT PLACE TO LIVE AND DO BUSINESS