

## **CHAPTER 1: INTRODUCTION**

### **1.1 PROJECT AND PROPONENTS**

The City of Bellingham and Whatcom County propose to update the 1995 Bellingham Comprehensive Plan and the 1997 Whatcom County Urban Fringe Subarea Plan applicable to Bellingham's Urban Growth Area in accordance with the requirements of the Washington State Growth Management Act. This update will also cover parts of the UGA that are located in two other County Planning Subareas: Lake Whatcom Subarea (Geneva UGA); and Chuckanut-Lake Samish Subarea (Yew Street Road UGA and Samish Way/Lake Padden golf course additional review area). The update is intended to accommodate the adopted 20-year (2002 – 2022) growth projections of 31,600 additional residents in the City of Bellingham and its UGA.

The proposed action includes a number of potential components:

#### **Actions by the City of Bellingham**

- 1) Adoption of an updated Bellingham Comprehensive Plan.
- 2) Approval of a new Urban Growth Area Plan and boundary for Bellingham's UGA.
- 3) Adoption of updated Countywide Planning Policies.
- 4) Adoption of revisions to the 1997 city/county interlocal agreement concerning annexation, growth and development in Bellingham's UGA.

#### **Actions by Whatcom County**

- 1) Adoption of revisions to sections of the Whatcom County Comprehensive Plan applicable to Bellingham's UGA.
- 2) Adoption of a new Urban Growth Area Plan and boundary for Bellingham's UGA.
- 3) Adoption of an updated Urban Fringe Subarea Plan.
- 4) Revisions to those portions of the Chuckanut/Lake Samish Subarea Plan and the Lake Whatcom Subarea Plan applicable to Bellingham's UGA.
- 5) Adoption of updated Countywide Planning Policies.
- 6) Adoption of revisions to the 1997 city/county interlocal agreement concerning annexation, growth and development in Bellingham's UGA.

This Final Environmental Impact Statement (FEIS) is intended to provide the basis for environmental review and evaluation of four alternative growth management scenarios for the City of Bellingham, the Bellingham Urban Growth Area, and the Urban Fringe Subarea. As such, this FEIS is a programmatic document that provides environmental impact assessment of a range of reasonable alternatives to accommodate the projected population growth.

### Description of the Alternatives:

- 1) No action or no change. This alternative assumes that the 20-year forecasted population and employment growth would be accommodated within existing city and UGA boundaries under current zoning and development regulations.
- 2) Infill. Under this alternative, the forecasted 20-year growth would be accommodated by revising zoning and development regulations to increase potential housing and employment opportunities within current city and UGA boundaries.
- 3) Adjusted UGA. This alternative looks at accommodating the forecasted growth primarily by adding additional developable land (including some or all of the “five-year review” areas) to Bellingham’s UGA and rezoning this land to allow urban levels of development. This alternative assumes that no zoning changes would occur within the City or existing UGA and also considers removing lands unsuited for urban development from the UGA.
- 4) Infill and Adjusted UGA. This alternative examines accommodating projected growth through infill as described in Alternative 2 and inclusion of additional land area in Bellingham’s UGA per Alternative 3.

A summary of the proposal and these four growth alternatives is provided at the end of this introductory chapter.

## **1.2 LOCATION**

The planning area encompasses the incorporated city limits of Bellingham and Whatcom County’s Urban Fringe Subarea planning area, which includes most of Bellingham’s designated Urban Growth Area (See Figures 1.2.1. and 1.2.2).

The Urban Fringe Subarea boundaries were originally established in 1979 when all of western Whatcom County was divided into geographic regions (subareas) to facilitate detailed planning. The Urban Fringe Subarea boundaries intentionally include both the bulk of the Bellingham UGA and adjacent Rural and Agricultural designated areas. This was done to allow planners to remain cognizant of the rural/urban interface and to monitor areas that may be candidates for future UGA expansion over the long term. This subarea boundary was reinforced in 1988 when the City of Bellingham designated a sewer service area (for financing purposes) that extends from the city limits north to Smith Road and to the east to Everson Goshen Road. The planning area also includes those parts of Bellingham’s UGA located within the Lake Whatcom and Chuckanut Lake Samish Subareas and some adjacent areas.

The City of Bellingham adopted its first GMA-mandated Comprehensive Plan in 1995. The Bellingham UGA boundaries were adopted by Whatcom County in May of 1997 with the adoption of the Whatcom County Comprehensive Plan and were revised by the County in September 1997 with the adoption of the updated Urban Fringe Subarea Plan.

**1.2.1. Land Area**

The City of Bellingham encompasses 16,350 acres (25.5 square miles) of incorporated land between Bellingham Bay, the Chuckanut Mountains, Lake Whatcom, and Kelly Road in the north. The Bellingham UGA encompasses a total of 7,340 acres (11.5 square miles), which include portions of the Urban Fringe Subarea Plan, the Lake Whatcom Subarea Plan, and the Chuckanut-Lake Samish Subarea Plan (See Figures 1.2.1. and 1.2.2).

The Urban Fringe Subarea lies east, north, and west of the city and generally extends to Mission Road on the east, Slater and Smith Roads on the north, and the Lummi Indian Reservation on the west and measures approximately 19,700 acres (30.8 square miles) in size. The portion of the UGA in the Urban Fringe Subarea extends approximately one half mile to two miles beyond the city limits and includes 5,280 acres (8.3 square miles).

The portion of the UGA in the Lake Whatcom Subarea encompasses the Geneva area from the city limits eastward approximately two miles and south of Lake Whatcom approximately one mile and includes 970 acres (1.5 square miles). The portion of the UGA in the Chuckanut-Lake Samish Subarea includes the Yew Street corridor between San Juan Boulevard and Samish Way, which measures 1,090 acres (1.7 square miles).

**1.2.2. City and UGA Planning Areas**

For the purpose of more detailed comprehensive planning, the City and UGA planning area is divided into 7 Analysis Areas, as listed below.

*Northwest Analysis Area:* Generally west of I-5, south of Slater Road to the Bellingham Bay shoreline and the city limits.

*West Central Analysis Area:* Includes the Northwest Drive/Aldrich Road area northwest of the City Limits and east of I-5;

*North Central Analysis Area:* Includes the 5-year review areas adjacent to the east and west sides of Guide Meridian from Smith Road south to the city limits including the Caitac and adjacent properties.

*East Central Analysis Area:* North and south of East Bakerview Road, south to the city limits, including the King and Queen Mountain area.

*Northeast Analysis Area:* Includes the Britton Road/Toad Lake/Dewey Valley area northeast of the city limits, east of Hannegan Road to Toad Lake Road and south to the Lake Whatcom watershed boundary.

*Watershed Analysis Area:* Includes the Hillsdale area adjacent to the city limits inside the Lake Whatcom watershed north of Lake Whatcom and the Geneva area inside the Lake Whatcom watershed south of Lake Whatcom.

*Southeast Analysis Area:* Includes the Yew Street Road corridor east of the Bellingham city limits and the additional review area adjacent to the southeast corner of the city limits between Samish Way and I-5.

### **1.3 THE POLICY FRAMEWORK**

The policy framework for managing growth and development in the City of Bellingham, the Bellingham's UGA, and Whatcom County is contained within state and local legislation and adopted plans and policies including: the Washington State Growth Management Act (GMA), County-wide Planning Policies, Whatcom County's Comprehensive Plan, the Urban Fringe Subarea Plan, and Bellingham's Comprehensive Plan. These documents require the City and County to work cooperatively to direct the location, timing, type and amount of urban growth while addressing aspects of population growth and land supply needs, land use patterns, urban design, housing, environment, parks, open space, trails, public facilities, utilities and transportation systems. The intent of the policy framework is to guide efforts to maintain and enhance the ecological integrity of the area, stimulate economic viability, retain and protect social equity and enhance the overall quality of life within the City of Bellingham, the Bellingham Urban Growth Area, and Whatcom County.

#### **1.3.1 The Washington State Growth Management Act (GMA)**

The Washington State Growth Management Act (GMA), adopted in 1990-91 establishes a framework for coordinated and comprehensive planning to help local communities manage their growth in a manner, which makes sense for each community. The GMA guides local governments by providing a full set of planning requirements in establishing their goals, evaluating their community assets, writing comprehensive plans and carrying out those plans through regulations and innovative techniques to achieve their future vision. The 14 goals of the GMA are listed in Appendix B of this EIS. The goals and other provisions of the GMA are generally intended to accomplish the following:

- Encourage development in urban areas where public facilities and services can be efficiently provided.
- Discourage the conversion of undeveloped land into sprawling, low density development.
- Promote efficient multi-modal transportation systems.
- Assure affordable housing for all income levels and a variety of residential densities and housing types.
- Protect private property rights.
- Provide timely and predictable processing of permits.
- Conserve timber, agricultural, and mineral resource lands.
- Protect critical areas and the environment.
- Provide open space and recreational opportunities.
- Coordinate economic development.

- Coordinate planning among neighboring jurisdictions.
- Provide adequate public facilities and services to serve new growth.
- Provide early and continuous public participation in the planning process.
- Protect shorelines.

### **1.3.2 County-wide Planning Policies**

In accordance with the requirements of GMA, County-wide Planning Policies were adopted by Whatcom County with concurrence by the seven incorporated cities in the county on March 31, 1993 and revised March 11, 1997. The county-wide planning policies establish a county-wide framework for developing and adopting city and county comprehensive plans and are intended to assure that city and county plans are consistent.

These policies address issues that affect the county as a whole including citizen involvement in planning; designation of and planning in urban growth areas; affordable housing; open space/greenbelt corridors; economic development and employment; transportation; siting of public facilities; impact fees; intergovernmental cooperation; water quality and quantity; fiscal impact; and private property rights.

### **1.3.3. The 1995 Bellingham Comprehensive Plan**

Bellingham's Comprehensive Plan is a comprehensive, integrated, and internally consistent document intended to promote economic vitality and the wise use of land. Its goals and policies are also intended to strengthen job creation and retention, support and increase the local tax base, encourage affordable housing, and protect the unique natural features and environment that make Bellingham a desirable place to live and work. The plan guides change and creates scenarios for future growth and development. It recognizes that planning is an active, continuous process that must be flexible enough to accommodate new information, new concepts, and new community needs.

The plan contains Land Use; Housing; Community Design; Transportation; Capital Facilities; Utilities; and Parks, Recreation and Open Space elements and includes background information and a set of community goals and policies. The plan addresses the adopted County-wide Planning Policies, the UGA goals and policies of the Whatcom County Comprehensive Plan, and the goals from the community visioning process "Visions for Bellingham." It provides the basis for review of Bellingham's land use districts in the form of neighborhood plans and maps, the Land Use Development Ordinance, the six-year Capital Facilities Program and other land use regulatory ordinances of the City of Bellingham. The Parks, Recreation and Open Space element of the Plan was updated in 2002.

### **1.3.4. The Whatcom County Comprehensive Plan**

In May 1997, after a lengthy public involvement and visioning process, Whatcom County adopted a comprehensive plan to address the requirements of the GMA. The plan was developed after a lengthy community visioning process and includes goals and policies on land use, urban growth areas, rural lands, open space, essential

public facilities, housing, capital facilities, utilities, transportation, economics, resource lands, recreation, design, and the environment.

### **1.3.5. Urban Fringe Subarea Plan**

In 1984, Whatcom County developed the Urban Fringe Subarea Plan (UFS Plan) applicable to approximately 20,000 acres located immediately north, west and east of Bellingham's city limits. Slater and Smith roads are generally this area's northern boundary. Mission Road is the eastern boundary and the Lummi Indian Reservation forms the western boundary. Recognizing that uncoordinated and unplanned growth pose a threat to the local environment and sustainable economic development, Bellingham and Whatcom County began a process in early 1990 to update the land use section of the Urban Fringe Subarea Plan. After a lengthy public review process by the city and county, the updated plan was adopted by the County Council in September 1997.

This revised UFS Plan was intended to ensure cooperation between Whatcom County and the City of Bellingham in directing and managing urban growth and development in Bellingham's Northern Urban Growth Area; and has been used in coordination with the Bellingham Comprehensive Plan, the Countywide Planning Policies and an interlocal cooperation agreement to guide land use and development in the Bellingham UGA.

The City and County agreed to the thirteen general policies applicable to Bellingham's Northern UGA and locational criteria and policies applicable to specific land use designations. The Urban Fringe Subarea Plan also included 5-Year review areas outside of the UGA that were to be reviewed when the plan was updated to determine if any of these areas are appropriate and/or necessary to be included in the city's UGA.

## **1.4 POPULATION GROWTH**

The population has increased significantly in Whatcom County and the City of Bellingham over the past decade. Between 1990 and 2000, population in Whatcom County grew by 39,000 people or 30%. In Bellingham, during the same period of time, the city grew by almost 15,000 people or 29%. Bellingham's share accounted for 38.5 percent of the county's total growth.

The Washington State Growth Management Act requires cities and counties to adopt comprehensive plans and set urban growth area boundaries to accommodate the projected population, housing and job growth. The population growth projections must be within the range provided by the State Office of Financial Management (OFM). Growth forecasts help communities to plan for land use, transportation, environmental protection, neighborhood character, school capacity, parks and open space, and affordable housing to meet the needs of the projected population. See Chapter 4 for specific population growth information and analysis.

## **1.5 PROJECT OBJECTIVES**

The proposed action includes the eventual adoption of updated city and county policy documents, zoning and other regulations that are used to guide and manage growth and development. These documents include the Bellingham Comprehensive Plan, Bellingham Urban Growth Area Plan and Boundary, and Whatcom County Comprehensive Plan and Urban Fringe Subarea Plan. The updates are required by state law to accommodate projected 20-year population, housing and employment growth.

The purposes of these planning efforts are to:

1. Manage growth in Bellingham, the Bellingham UGA, and the surrounding rural areas. The City and UGA are expected to grow by approximately 40% over the coming 20 years. City and county staff are working to plan for and manage the forecasted growth according to the requirements of the GMA and the goals and policies in the city and county comprehensive plans.
2. Guide planning decisions and the physical development in the city and in areas adjacent to the city limits so that the forecasted growth occurs in designated areas where the necessary public facilities and services can be efficiently provided. The city and county comprehensive plans have adopted goals to limit growth in rural areas, environmentally sensitive areas, and on key agricultural or resource lands.
3. Encourage a smooth transition from County jurisdiction to City jurisdiction as both developed and undeveloped areas within the UGA are annexed to the City. The plan recognizes that the City is the appropriate provider of urban services as required by the state GMA and local policy.
4. Provide certainty to residents, property owners, developers and the community regarding the nature and extent of future development in Bellingham and in the city's UGA.
5. Provide a positive and appropriate transition from urban to rural land uses.
6. Encourage cooperation between city and county governments.
7. Provide for consistent development standards and one permitting agency.
8. Implement adopted policy documents such as the City and County comprehensive plans, the interlocal cooperation agreement and the County-wide Planning Policies.

The city and county comprehensive plans address land use, housing, transportation, parks and open space, capital facilities and utilities. They were developed for use by

citizens, planners, developers, and elected officials as a statement of intent and as a guide for future land use development by providing goals and policies that are designed to accommodate desirable growth and development in Bellingham, the Bellingham UGA, and the Urban Fringe Subarea. The City and County will use the versions of these plans to guide the physical development of the community and decisions concerning the expenditure of funds for capital improvement projects. Finally, the updated plans will be used to guide the development of programs, regulations, procedures, and activities necessary to carry out the plan goals and policies.

### **1.6 DECISION PROCESS**

The 2004 Draft Environmental Impact Statement (DEIS) was published on March 26, 2004 and made available to government agencies and the public for review and submission of written comment over a 30-day period (March 26, 2004 - April 26, 2004). During this public comment period, a public hearing was advertised and held and public testimony was taken regarding the four growth alternatives analyzed in the DEIS. City and County Planning staff has responded to all written comments and public testimony regarding the alternatives in this 2004 Final Environmental Impact Statement (FEIS).

The 2004 FEIS will provide a baseline analysis of existing conditions, anticipated impacts of the four growth alternatives, and recommendations for mitigation of impacts, where possible. City and County Planning Commissions will use the FEIS when completing updates to the Bellingham Comprehensive Plan, the Bellingham Urban Growth Area Boundary, and the Urban Fringe Subarea Plan. Plan updates will be made in the context of the *Growth Management Act* planning goals, the *County-wide Planning Policies*, the UGA goals and policies of the *Whatcom County Comprehensive Plan*, and the *Visions for Bellingham* goals.

The Planning Commissions will review and recommend preferred plan updates to the City and County Councils in the form of policies, maps and zoning proposals. The preferred plan updates may combine various elements from each of the growth alternatives. Planning Commission recommendations regarding plan updates will be forwarded to the City and County Councils before the end of the year. Once approved by Councils, the updated plans will be reviewed by the State Department of Community Development for consistency with the *Growth Management Act*. The deadline for submittal to the state is December 31, 2004.

The Final EIS which consists of comments on the Draft EIS, responses to those comments and any warranted revisions to the DEIS has been published in advance of City and County Council public hearings or actions taken on the proposal. Final action on the Bellingham Comprehensive Plan update may include recommendations for specific zoning changes and an action plan for implementation of plan goals and policies.



## **1.7 APPEALS**

The Growth Management Act includes a process for appealing comprehensive plans and amendments to plans that allows any city or county required to plan under GMA; the State Department of Community Development; or any aggrieved party to petition the Growth Management Hearings Board. Comprehensive plan appeals generally fall under one of two categories: 1) that the agency's plans are not in compliance with the requirements of the GMA; or 2) that the 20-year population projection adopted by the State Office of Financial Management should be revised. The Growth Management Hearings Board is required to render a decision on the petition within 180 days (See RCW 36.70A for more information on the appeal process).

## **1.8 SUMMARY OF THE PROPOSAL AND THE ALTERNATIVES CONSIDERED**

The four alternative growth scenarios for the planning area reflect varying degrees of possible residential, commercial and industrial development. The following land use alternatives have been formulated for analysis in this FEIS after an extended review process that included a series of approximately 6 neighborhood meetings held in the City and in the County's Urban Fringe Subarea. Various elements of the alternatives are not mutually exclusive and may be combined in a preferred alternative to be determined through the public process by the City and County Councils.

It should be noted that under each of the four alternatives, projected population growth remains constant and is based on an adopted population projection of 31,600 additional residents in the City of Bellingham and the Bellingham UGA by the year 2022.

### Alternative One (No Action)

Under this no action alternative, the forecasted 20-year population and employment growth would be accommodated on vacant and underused lands within existing city and UGA boundaries. No changes to current zoning, environmental and other development regulations would occur. The No Action alternative is required by SEPA for the purposes of analysis, but it is not an alternative that is being seriously considered.

### Alternative Two (Infill)

This alternative emphasizes concentrating new development on land in within the existing boundaries of the City of Bellingham and the UGA to accommodate future growth. New zoning and regulatory mechanisms would be established to encourage infill and emphasize residential development in appropriate areas close to employment and service centers to create more compact growth. Existing commercial and industrial zones would not be expanded outside the UGA boundary. Areas identified as appropriate for additional development within both the City and UGA would be evaluated for new land use designations.

### Alternative Three (Adjusted UGA)

This alternative proposes adjusting the existing Bellingham UGA to create a larger urban growth area to accommodate the majority of the anticipated growth. This alternative assumes that no zoning changes would be made in the City or existing UGA. Existing county zoning would be reviewed to identify areas appropriate for commercial, industrial, or higher density residential development. Alternative 3 focuses on several "5-Year Review Areas" that were identified when the Bellingham UGA boundary was adopted in 1997. Several property owners in these areas submitted testimony to the County and City requesting inclusion of these areas in the Bellingham UGA. The City and County Councils agreed to re-evaluate these areas when the Urban Fringe Subarea Plan and UGA boundary are updated. This alternative may also consider other areas for UGA inclusion as deemed appropriate.

### Alternative Four (Infill and Adjusted UGA)

This alternative proposes a combination emphasis on infill development as described in Alternative 2 and inclusion of one or more 5-Year Review Areas as described in Alternative 3. New regulatory mechanisms would be established to encourage infill and emphasize residential development close to employment and service centers to create more compact growth. Some areas within the City and UGA may be recommended for new land use designations. Existing county zoning in preferred 5-Year Review Areas would be reviewed to identify areas appropriate for commercial, industrial, or higher density residential development.

### Other Growth Alternatives

It is possible that other growth alternatives not studied in this FEIS will come up during the comprehensive planning process. Staff could evaluate other growth scenarios in a supplemental EIS, if so directed by the City and/or County Council.

### Alternative Suggested but Rejected

A "no growth" scenario was suggested by some during the public participation process. It should be noted that the GMA, the city and county comprehensive plans, the County-wide Planning Policies and Visions for Bellingham all contain goals which acknowledge the benefits of accommodating new growth in urban areas where urban services can be affordably provided. None of these framework documents advocates implementation of policies which would discourage new development, except in extreme cases of environmental sensitivity. Because the City and County are required to comply with state law, it is doubtful that a no growth policy could be legally supported and may in fact expose the city and county to sanctions as provided under RCW 36.70A.340 of the GMA. Therefore a no growth alternative has not been included in this FEIS.

### Summary Evaluation of the Growth Alternatives

The 20-year population growth forecast adopted by the City and County Councils is used throughout this FEIS. The method by which the City accommodates this growth, however, is different under each of the growth alternatives. The population of Bellingham and the UGA is expected to increase by 31,600 new residents to

reach a total population of 113,055 by the year 2022. See Chapter 4 for a detailed evaluation of the four alternatives.

### ***Alternative 1 - No Action***

Under this no action alternative, the forecasted 20-year population and employment growth would be accommodated on vacant and underused lands within existing city and UGA boundaries. No changes to current zoning, environmental or other development regulations would occur (See Figure 1.8.1.).

#### Residential Development

New residential development would occur where vacant land is available. Development patterns in the city and UGA would likely reflect those of the last 25 years (Bellingham is 11th in the state in total population and 54th in overall density). The resulting residential development would likely be suburban style low density (the average developed density in city single-family areas is 3.8 dwelling units/acre) with detached single-family homes on non-connected streets. New residential development would be concentrated in a few neighborhoods that have the majority of the vacant single and multi-family zoned land supply.

In the Bellingham UGA, low density (current average density = 2.3 units/acre) residential development would continue in the existing UGA under current zoning and development regulations.

#### Commercial and Industrial Development

In the City and UGA, the No Action alternative would be expected to result in new commercial and industrial development that is predominately land intensive one-story buildings with large, sparsely landscaped parking lots. Commercial development would continue in the areas of the city with existing developable land such as Guide Meridian/Cordata area and downtown Bellingham. Industrial development would continue to occur in areas of the city and UGA currently zoned industrial, such as the Hannegan/Bakerview and Bellingham Airport areas.

#### Summary of the No Action Alternative

Adoption of the No Action alternative would leave the city and UGA short of the land area needed to accommodate the forecasted 20-year growth in population, housing and employment. As a result, updated City and County comprehensive plans emphasizing this alternative may not comply with some GMA requirements and could result in legal challenges to the Western Washington Growth Management Hearings Board. A finding of non-compliance with the GMA can result in sanctions and the loss of state funding and eligibility for state and federal grants. Chapter 4., Section 4.2.2., Table 4.2.2.1., shows the application of Alternative 1.

### ***Alternative 2 - Infill***

Accommodating the forecasted growth under an "Infill" alternative means using the remaining vacant and underused land within the current city and UGA boundaries to accommodate the forecasted 20-year growth in population, housing and employment. To do so would require some zoning changes in areas where the land is suitable and the infrastructure capacity exists or could be provided to support the higher densities that would be required to accommodate the forecasted growth. Densities within some identified neighborhoods would increase as infill occurs (See Figure 1.8.2.). Any proposed changes to zoning and/or development regulations requires City Council approval after a public review process by the Planning Commission.

Development patterns that encourage alternatives to the automobile are emphasized under this alternative to reduce congestion, improve air quality and accommodate higher densities. High-density residential development is encouraged within walking distance of neighborhood centers, employment centers, shopping destinations, major transportation corridors, and transit routes. Pedestrian oriented development and amenities are encouraged to provide a livable environment and to support walking, bicycling, and transit use.

Under this alternative, future residential, commercial and industrial growth would primarily be encouraged in or near the "urban development centers" and "town centers" identified in the Bellingham Comprehensive Plan. These centers include areas where public infrastructure (roads, water, sewer, schools, parks, police and fire protection) are already in place, and where a range of employment and service opportunities are available.

#### **Summary of the Infill Alternative**

The infill growth scenario envisioned in Alternative 2 is consistent with the State Growth Management Act, the City and County comprehensive plans, the County-wide Planning Policies and Visions for Bellingham. The infill scenario would encourage compact growth in mixed use areas that can be more affordably served by public facilities and all modes of transportation including pedestrian, bicycle, and transit. Adoption of an infill development strategy could also allow existing UGA land to accommodate residential development while preserving valuable environmental features. Chapter 4., Section 4.2.2., Table 4.2.2.2., shows various combinations and applications of Alternative 2.

### ***Alternative 3 - Adjusted UGA***

This alternative assumes that no zoning changes would be made within the City or UGA (as described under the No Action alternative). Under this alternative, the UGA boundary would be expanded to include additional vacant developable land needed to accommodate the projected growth and the majority of the growth would be directed towards the north. Alternative 3 examines several areas outside the

existing UGA boundaries for potential inclusion in an expanded UGA (See Figure 1.8.3.).

When the County Council adopted the Urban Fringe Plan and the Bellingham UGA in 1997, they also recommended a series of “Five Year Review Areas” for future consideration and potential inclusion in the Bellingham UGA. Some of these areas have limited capacity to accommodate urban growth due to environmental factors, such as wetlands, salmon streams, and/or steep slopes. Some of the 5-Year Review areas may be difficult and expensive to serve with the full range of urban services, such as police, fire and emergency medical and public facilities such as sewer, water, streets, sidewalks, bicycle lanes, street lights, and storm drains. Existing County zoning in preferred 5-Year Review Areas and other appropriate areas would be reviewed to identify areas appropriate for commercial, industrial, or higher density residential development.

#### Summary of the Adjusted UGA Boundary Alternative

The strategies contained in this alternative are less supported by the goals and policies in the Growth Management Act, the City and County comprehensive plans, County-wide Planning Policies and Visions for Bellingham. Adding large tracts of land areas to the city and/or Urban Service Area for the purpose of adding to the existing supply of land available for housing, without exploring the possibilities for infill development, would be contrary to the compact growth and efficient land use goals in the GMA. The City and County Councils may determine through the public process that there are valid reasons for adding one or more of the preceding areas to the existing Bellingham UGA. This alternative may also consider other areas for UGA inclusion as deemed appropriate. Those issues will be further addressed in the Urban Fringe Subarea Plan update process. Chapter 4., Section 4.2.2., Table 4.2.2.3., shows various combinations and applications of Alternative 3.

#### ***Alternative 4 – Infill and Adjusted UGA***

Alternative 4 proposes a combination emphasis on infill development as described in Alternative 2 and inclusion of one or more 5-Year Review Areas or other areas as described in Alternative 3. The existing conditions are described under each of these two growth alternatives. The anticipated impacts of a combined infill and adjusted UGA growth strategy would vary with the degree of infill and the degree of expansion of the UGA boundary (See Figure 1.8.4.).

#### Summary of the Infill and Adjusted UGA Boundary Alternative

Under this alternative, the best parts of the infill and adjusted boundary alternatives would be used to accommodate the forecasted 20-year population, housing and employment growth. This scenario would combine increases residential densities in appropriate areas of the existing city and UGA with expansion of the UGA boundary where it makes sense to do so based on the site conditions and ability to serve with the full range of urban services. A strategy that encourages locating the majority of new development in existing urban areas but also allows expansion of the UGA in

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specifically targeted areas could be consistent with the GMA, City and County comprehensive plans, County-wide Planning Policies, and Visions for Bellingham. Chapter 4., Section 4.2.2., Table 4.2.2.4., shows various combinations and applications of Alternative 4.