**WHATCOM COUNTY COUNCIL AGENDA BILL**

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<th>CLEARANCES</th>
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<th>Date Received in Council Office</th>
<th>Agenda Date</th>
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<tr>
<td>Division Head: Sylvia Goodwin</td>
<td>9/17/04</td>
<td>10/26/04</td>
<td>P&amp;D / Council</td>
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<td>Prosecutor: Karen Frakes</td>
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<td>Executive: Pete Kremen</td>
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**SUBJECT:**
Proposed amendments to the Whatcom County Comprehensive Plan, Chapter 2 – Land Use, City of Ferndale Urban Growth Area

**ATTACHMENTS:**

1. Proposed ordinance
2. Planning Commission Findings of Fact & Reasons for Action, Conclusions, and Recommendations
3. Staff report and proposed amendments
4. Draft Planning Commission minutes

**SEPA review required?**

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<th>(x) Yes</th>
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**SEPA review completed?**

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**Should Clerk schedule a hearing?**

| ( ) Yes | (x) NO |

**Requested Date:**

1. A hearing must be held if the Council changes the Planning Commission recommendation (WCC 20.10.110).

**SUMMARY STATEMENT:**

Pursuant to RCW 36.70A.130, Whatcom County is required to review and revise its comprehensive plan, as needed, by December 1, 2004. The proposed amendments constitute Whatcom County’s 7-year review and update of sections of the Whatcom County Comprehensive Plan, Chapter 2 – Land Use, related to the City of Ferndale UGA. The amendments clarify use and calculation of “net developable” densities in the UGA; add reference to a new Ferndale Critical Areas Ordinance; add text regarding UGA expansion in the Grandview area; add text regarding residential development and utilities east of the City UGA; and amend Policy 2W-6 to update information regarding the interlocal agreement between the City of Ferndale and the County.

Note: The subject proposal is one of a number of comprehensive plan amendments initiated this year. These amendments must be considered concurrently by the County Council so that the cumulative effect of the various proposals can be evaluated (RCW 36.70A.130). Additionally, pursuant to the review schedule established in WCC 20.10.120, final Council action on these amendments should occur on or about November 30.

**COUNCIL ACTION TAKEN:**

- 10/26/2004: Committee amended & recommended approval to full Council.
- 10/26/2004: Council amended, public hearing to be held.
- 11/23/2004: Forwarded to concurrence
- 1/25/2005: Adopted 7-0, Ord. #2005-015

**Related County Contract #:**

**Related File Numbers: CMP2004-00005**

**Distribution Request**

- Include those who should receive a copy after Council action, list specific names if needed. Right:

  - ADS Facilities Management
  - ADS Finance
  - ADS Human Resources
  - ADS Info Services
  - Assessor
  - Auditor
  - Cooperative Extension
  - District Court
  - Executive
  - Health
  - Hearing Examiner
  - Jail
  - Juvenile
  - Parks
  - Planning
  - Prosecutor
  - Public Works
  - Sheriff
  - Superior Court
  - Treasurer
  - Other

**Ordinance or Resolution Number**

- (this item): Ord. #2005-015
ORDINANCE NO. 2005-015

AMENDING THE OFFICIAL WHATCOM COUNTY COMPREHENSIVE PLAN, CHAPTER 2 – LAND USE, TO UPDATE SECTIONS RELATING TO THE CITY OF FERNDALE URBAN GROWTH AREA, AS NECESSARY, IN ACCORDANCE WITH THE GROWTH MANAGEMENT ACT 7-YEAR COMPLIANCE REVIEW REQUIREMENT PER RCW 36.70A.130

WHEREAS, the Growth Management Act requires counties and cities to review and, if needed, revise comprehensive plans to ensure continued compliance with the GMA (RCW 36.70A.130); and

WHEREAS, it is also appropriate to review the comprehensive plan in light of new information and changed County and City priorities; and

WHEREAS, pursuant to RCW 36.70.390, legal notice was published in the Bellingham Herald; and

WHEREAS, the Planning Commission held a public hearing on the proposed amendments on July 22, 2004 and held additional work sessions on August 12, 2004 and September 9, 2004; and

WHEREAS, the Planning Commission has evaluated the proposed amendments; and

WHEREAS, the County Council has considered the Planning Commission’s Findings of Fact & Reasons for Action, Conclusions, and Recommendations; and

WHEREAS, the Whatcom County Council finds the amendments to be within the interest of the public health, safety and welfare; and

WHEREAS, the County Council has adopted the following Findings and Conclusions:

FINDINGS AND CONCLUSIONS

1. Notice of the Planning Commission public hearing for the subject amendments was published in the Bellingham Herald on July 8, 2004.


3. A determination of Non-significance was issued by the Whatcom County SEPA official on August 30, 2004.

4. State law requires that Whatcom County review its Comprehensive Plan by December 1, 2004 to ensure continued compliance with the Growth Management Act (RCW 36.70A.130).
5. Pursuant to RCW 36.70A.130, the proposed Comprehensive Plan amendments attached as Exhibit A constitute Whatcom County's seven-year review and update of the official Whatcom County Comprehensive Plan, Chapter 2 – Land Use, Urban Growth Areas (UGAs) sections, relating to the City of Ferndale UGA to ensure continued compliance with the GMA and incorporate new information.


7. Pursuant to RCW 36.70A.110, counties are required to designate urban growth areas within which urban growth will be encouraged and outside of which growth can only occur if it is not urban in nature.

8. Pursuant to RCW 36.70A.130 cities and counties are required to continually review, evaluate, and revise their comprehensive plans and development regulations, if needed, to ensure that the provisions of those plans and regulations are consistent with the requirements of the Growth Management Act (GMA).

9. Pursuant to RCW 36.70A.130(4)(a) the county and cities are also required to review and revise their comprehensive plans and development regulations, as needed, by December 1, 2004 and every seven years after that.

10. As many of the cities are currently in the process of reviewing and updating their respective comprehensive plans, no amendments are proposed to the boundaries or allowable development densities within the Ferndale Urban Growth Area as part of the proposed amendments. Whatcom County will conduct a review and update of urban growth areas, as necessary, in accordance with RCW 36.70A.130(3).

11. Services and utilities are currently available, or are planned to be available, to serve City UGAs.

12. The County has entered into interlocal agreements with all of the Cities regarding annexation and development in the Urban Growth Areas.

13. Updated population projections for the County and Urban Growth Areas have been adopted by Whatcom County.

14. Designated Resource Lands are not being impacted by the proposed amendments to the County Comprehensive Plan as no additions are being proposed to any of the previously adopted city Urban Growth Boundaries.

15. The County anticipates initiating future modifications to current zoning designations within UGAs to ensure that future urban development densities can be achieved.

16. The City of Ferndale adopted a Comprehensive Plan in October, 1996 and is currently working on an update.

17. The City of Ferndale and Whatcom County entered into an interlocal agreement regarding annexation and development within the Ferndale Urban Growth Area in 1999.

18. The City of Ferndale proposed an amendment to the County Comprehensive Plan to amend the
City Urban Growth Area boundary in 2004, but this amendment was determined to be an incomplete application by the Whatcom County Council and was not processed.

19. The Urban Residential (UR3) zoning within the Ferndale Urban Growth Area has a density of one housing unit per five acres without public water and sewer. The City of Ferndale is the only purveyor of public sewer to this area and has a policy not to extend City sewer outside of the City Limits. Therefore, this area will remain at rural density until it is annexed to the City.

NOW, THEREFORE, BE IT ORDAINED by the Whatcom County Council that:

Section 1. The Official Whatcom County Comprehensive Plan be amended as shown in Exhibit A.

Section 2. Adjudication of invalidity of any of the sections, clauses, or provisions of the Comprehensive Plan shall not affect or impair the validity of the plan as a whole or any part thereof other than the part so declared to be invalid.

ADOP TED this __ day of January, 2005

WHATCOM COUNTY COUNCIL
WHATCOM COUNTY, WASHINGTON

Laurie Caskey-Schreiber, Council Chair

() Approved ( ) Denied

Pete Kremen, Executive

Date: 1-28-05

Karen Frakes, Civil Deputy Prosecutor

Dana Brown-Davis,
Clerk of the Council

APPROVED as to form
Comprehensive Plan text amendments recommended by County Council on October 26, 2004 are shown in double strikethrough text.

**WHATCOM COUNTY COMPREHENSIVE PLAN**, Chapter 2 – Land Use
(from pages 2-34 to 2-36 of the Whatcom County Comprehensive Plan)

**Ferndale**

County goals encourage Ferndale to develop **residentially zoned areas** at average net densities of six to eight units per net developable residential acre. **Net developable acreage is calculated by subtracting areas with development limitations such as steep slopes, flood areas, and other critical areas, and land needed for rights-of-way, utilities, infrastructure, and open space.**

Issues in defining the Ferndale Urban Growth Area include protection of wetlands, provision of serviced industrial land, inclusion of adjacent land with services and urban levels of development or urban zoning, and overlapping jurisdiction with Bellingham.

There are over 500 acres of wetlands within Ferndale’s proposed urban growth area. Some of the regulatory protection currently provided by county regulations will be lost as these lands transfer into Ferndale’s regulatory control. Some further protection measures may be necessary. A revised Critical Areas Ordinance for the City of Ferndale will be in effect by the end of the year 2004. As critical areas are transferred into Ferndale’s regulatory control, this ordinance will provide protection to critical areas.

The Grandview Industrial Park has been included in the urban growth area. This inclusion supports the policies in the Economics chapter of this plan to provide a sufficient supply of serviced industrial land. Ferndale is willing to provide water and sewer service. **The City is considering a Comprehensive Plan amendment to expand the Urban Growth Area north from the intersection of Portal Way and Enterprise Road to a quarter mile north of Grandview Road, thus providing a “utility corridor” to connect these two areas.**

Generally, the UGA for Ferndale follows the goal “to include areas which presently have urban zoning.” Most areas which are adjacent to Ferndale and presently have Urban Residential zoning have been included.

The urban growth area identified for Ferndale attempts to provide the best balance among encouraging growth within the cities, maintaining low density rural areas outside of UGAs, and recognizing the desires of Whatcom County residents.

**Areas included in the UGA - (Map UGA-4)**

**North**

Areas to the north include all the land presently zoned for urban residential use and some R-5 area. While some of this land is in active dairy farm use, its inclusion is an attempt to recognize Community Value Statements to not downzone property. If left in the county, the area could not remain at present zoning levels and be consistent with county goals for rural lands. Also included is the Grandview Industrial area.
West
This area has been identified as a potential growth area for Ferndale for a number of years and thus has a County Urban Residential zone designation.

East
Areas to the east include a small amount of Urban Residential zoning. This area was determined to be necessary to meet the growth needs of Ferndale and is serviced with water and sewer by the City of Ferndale. In addition, there is residential development east of the Ferndale UGA that is presently served by Ferndale City water. Sewer service has also been extended beyond the current easterly Ferndale UGA border to serve development along the Smith Road.

South
Very little land area to the south has been included in the urban growth area. However, the area south of Slater Road has been included for its viability as part of the urban growth area.

GOAL 2W: Provide a sufficient Urban Growth Area for Ferndale to retain existing character and attain Growth Management Act and county land use goals.

Policy 2W-1: Require Ferndale to increase critical area protection to levels sufficient to maintain the functions of valuable wetlands and develop regulations which encourage clustering of development outside critical areas.

Policy 2W-2: Support City of Ferndale planning efforts for in-fill development within the existing city limits and development of its UGA which will result in average densities of over 3 units per residentially zoned acre.

Policy 2W-3: Ensure that adequate capital facilities can be provided to the Grandview Industrial area within a timely fashion to accommodate development of the area.

Policy 2W-4: Establish a revenue sharing agreement which fairly compensates the county if a loss of revenue from the Grandview Industrial Area exceeds reduction in associated costs.

Policy 2W-5: Encourage Ferndale to revise its development regulations to encourage clustering of development outside of critical areas and to work towards development of a "wetland bank" to mitigate impacts of development on scattered wetland areas within the city.

Policy 2W-6: Review and update the Negotiate and adopt an interlocal agreement with Ferndale, as needed, to provide which provides for:

- restriction of extension of urban levels of service to urban uses policies regarding utility service outside the Short Term Planning Areas of the UGA
- revenue sharing formulas
• levels of service within the UGA

• identification of needed improvements and establishment of how they will be paid for

• land-use and zoning designations and density levels of development within the UGA and review of procedures and standards, including wetland protection, for development proposals

• coordination with the county of greenbelts and open space

• use and coordination of a Geographic Information System

• timing and procedures to be used for review of adequate land supply

• consistency with the Coordinated Water System Plan

• exploration of transferring densities from rural areas of the county into Ferndale or the UGA
Unincorporated Urban Growth Areas

WHATCOM COUNTY COMPREHENSIVE PLAN, Chapter 2 – Land Use
(from pages 2-47 to 2-51 of the Whatcom County Comprehensive Plan)

Note: Double underline and double-strikethrough text indicate additional amendments recommended by the Whatcom County Planning Commission on July 8, 2004.

Unincorporated Residential/Recreational Urban Growth Areas

Birch Bay, Sudden Valley, and the Columbia Valley/Kendall area are unincorporated areas with sizable populations and substantial amounts of existing, residential/recreational development. These areas are characterized by a mix of permanent residents and second home use, which reflects both the population growth that has occurred in the unincorporated areas of Whatcom County and the resort/recreational nature of these areas.

Birch Bay

Birch Bay is a resort community which has the most development highest growth rate and the most potential for development of any unincorporated area in the county. The area has historically been a second-home resort area with a trend toward permanent, often retirement homes. A high proportion are still second homes. According to the 2000 U.S. Census, approximately 51% of the housing units in the Birch Bay Census Designated Place are vacant or seasonally occupied. The 2000 census counted 5,094 housing units in the Birch Bay Census Designated Place, including recreational units and RV sites.

It is currently estimated that there are approximately 2,300 vacation and residential dwelling units in the Birch Bay region. There are also 3,000 an estimated 2,210 acres of undeveloped residential zoned land in the Birch Bay UGA with urban zoning. Approximately 549 Over 1,000 of these acres are used for parks, and other public uses or are constrained by wetlands and other critical areas. Considering existing vacant-platted lots, a 25% market factor, the high seasonal use (estimated at 45% based on 1990 US Census data), and a deduction of land for infrastructure, utilities, a town core area, and shoreline and critical areas, buffers, the growth estimate for there is sufficient residential land for approximately 4,235 new residential or recreational units within the Birch Bay Urban Growth Area during the planning period is approximately 2,300. This would account for about 6,300 new residents over the planning horizon. Assuming that 50% of the units will be recreational and that the occupied units would have 2.33 residents per household, these housing units could house an additional 4,932 full-time residents and provide as many as 2,117 seasonal housing units or RV sites.

Water and sewer are provided by Birch Bay Sewer and Water District which has a network of water lines throughout most of the district, essentially cotermous with the urban growth area designated zoning. Birch Bay has the capability of providing sewer service to the area, but the present system covers a much smaller geographic area than the water distribution.

The district purchases water under a contractual agreement from the City of Blaine, but the city is seeking to reduce the amount of water it sells to the district. Recently, the district completed a contractual agreement with the Public Utility District No. 1 (PUD) to purchase water which the PUD pumps from the Nooksack River. This agreement assumes using excess capacity at the Ferndale water treatment plant to purify water for potable use. Possible limitations on the "area of use" of the water withdrawn by the PUD may be an issue in supplying water to the Birch Bay
Unincorporated Urban Growth Areas

Agency Report EXHIBIT A

Water and Sewer District. The district continues to explore a variety of options to respond to the water supply issues, including constructing their own water treatment plant or using Ferndale's treatment plant. In April, 2002, the District entered into a 30 year contract with the City of Blaine to purchase water adequate to serve the District's projected need for water through 2022. The District also has a pending application for groundwater rights to a well drilled by the District, and an application to transfer water from the Nooksack river, by means of a contract with Whatcom County PUD 1, to supply the longer term needs of the community.

Portions of the district, areas zoned for single-family residential, are contiguous to the City of Blaine. One area in particular, if annexed to Blaine, would provide a land connection between two areas of the city that are connected by water only. There is a question of who should have jurisdiction over these areas. It has been included within the Blaine UGA but this decision may need to be re-evaluated depending on water supply.

In 1992, an attempt was made to incorporate Birch Bay; however, it was defeated by the voters. One of the issues was whether a portion of the Cherry Point Industrial Area should be included within the boundaries for incorporation. The County Comprehensive Plan now includes a number of policies that would prohibit the inclusion of the Cherry Point area with the boundaries of a future incorporation of Birch Bay.

Birch Bay was originally planned and zoned in its present configuration in the 1970s. This planning and zoning were reaffirmed in 1987 with the adoption of the Birch Bay - Blaine Subarea Plan. Since that time, wetland constraints have become a much bigger issue and are a major limiting factor for portions of the area. In 2002, a citizen group competed a Community Plan for the Birch Bay Urban Growth Area and surrounding rural area. The Birch Bay Community Plan, as revised, is adopted as a Subarea of the Whatcom County Comprehensive Plan and provides more detailed background information and policy direction regarding growth and development within Birch Bay. Where there are conflicts between the Birch Bay Community Plan and the Whatcom County Comprehensive Plan, the County Comprehensive Plan shall prevail.

Columbia Valley/Kendall

Located in the northeast region part of the developed portion of the county, the Columbia Valley/Kendall UGA area is the most populous area in the eastern part of Whatcom County.

The Columbia Valley area, like many other areas in Whatcom County, was originally developed to cater to a seasonal population, primarily Canadians who are allowed to spend up to six months per year in the United States. 2000 U.S. Census data indicates that approximately 52% 53% of the existing housing population is either seasonal or vacant. However, portions of the area, particularly Paradise Lakes, have become attractive for permanent residents, with this trend expected to increase to 60% in the 20 year planning period. The lots are affordable and the current and projected development will provide an available work force for economic development.

Columbia Valley refers to two large subdivisions, Paradise Lakes and Peaceful Valley, which are located along both sides of Kendall Road (SR 547). These developments include a golf course, a large pond and wetland complex along Kendall Creek, and some undeveloped land. There are approximately 2,000 platted lots, with an estimated 1,615 1,375 current dwelling units consisting of both recreational cabins, manufactured homes, and permanent residences. Since
designation of the Columbia Valley/Kendall UGA in 1999, dwelling units have increased by approximately 17%. Accounting for some buildout of undeveloped land, summertime populations could reach 5,000 people within the 20 year planning horizon.

Paradise Lakes has public roads and continues to rely on a water association and utilizes septic systems for sewage disposal. The Evergreen Water-Sewer District provides public water service (formerly provided by the Paradise Lakes Country Club) to residential and camper lots within the Paradise Lakes divisions. Peaceful Valley has private roads and a water and sewer system managed by Water District 13 which has ample capacity. The district has gone through bankruptcy because of the need to carry the capital debt and operating costs of a system that is under-utilized.

Public transit service is provided to the Columbia Valley/Kendall area by the Whatcom Transportation Authority (WTA). Local east-county law enforcement is provided by a full time resident Sheriff's Deputy that is based out of Kendall. The small town of Kendall has a commercial district, fire station, and an elementary school.

**Sudden Valley Provisional UGA**

Sudden Valley was established in the early 1970s as a recreation/resort area located in the Lake Whatcom Watershed. But over the last thirty years it has developed into an Urban Residential area. Sudden Valley has private paved roads, all underground utilities (electricity, gas, cable and telephone), and a public water and sewer system provided by Water District 10. Fire District #2, strategically located in Sudden Valley, provides fire and ambulance service. Sudden Valley’s 1,724 1,545 total acres originally included 4,648 platted single-family lots/condominiums, a limited commercial area, community facilities, a marina, and a golf course. Of the 1,545 acres, 835 acres of open space and 140 acres of golf course (53%) are community association owned. The remaining 749 579 acres (43%) (37%) are private property. 2000 US Census data indicates that approximately 26% 22% of the existing housing population in Sudden Valley is either seasonal or vacant.

Sudden Valley contributes to a high volume of vehicle trips on Lake Whatcom Boulevard and Lake Louise Road. Right-of-way and alignment studies have been proposed for the 6-year TIP to study alternatives, cost and location relative to addressing the growing volume of vehicular trips on Lake Whatcom Boulevard and Lake Louise Road. Public transportation services are provided supplied by the Whatcom Transportation Authority (WTA).

Sudden Valley lies within the Lake Whatcom Watershed where limiting development has been identified as desirable. The Sudden Valley Community Association (SVCA) has a Board of Directors mandated lot consolidation program with a targeted density reduction of 1,400 lots, reducing the total lots for development from 4,648 to 3,248. To date approximately 75% 67% (1,047 943 lots) have been placed into density reduction of which 452 348 are voluntary private lot consolidation. SVCA funding has been set aside to purchase additional lots for density reduction. In accordance with the 2000 Lake Whatcom Management Program, the County and Water District 10 have also assisted Sudden Valley with their density reduction program through several joint agreements and exchanges of property and restrictive covenants. To date, the SVCA, County, and Water District 10 have acquired 115 undeveloped lots in Sudden Valley at annual tax foreclosure auctions. The Lot Consolidation Covenant to Bind process has, also, increased voluntary private lot consolidation. The County Council has exempted Sudden Valley
from the Lake Whatcom Transfer of Development Rights (TDR) program because Sudden Valley's density reduction plan meets the intent of the TDR program.

Since 1985, Sudden Valley has mandated the use of appropriate stormwater best management practices through standards for individual stormwater detention for all new construction. Any new building permits on existing lots must be able to demonstrate that stormwater detention is included on the plan as a pre-condition to issuance of a permit. Sudden Valley is also subject to additional regulatory protections that apply to the Lake Whatcom watershed under the Water Resource Protection Overlay District, Stormwater Special District, and Water Resource Special Management Area requirements. Under the provisions of these special districts, potential impacts from impervious surfaces, stormwater runoff, and clearing activities are required to be addressed on-site.

Sudden Valley has implemented a 10-year Forest And Wildlife Stewardship (FAWS) plan with the State of Washington Department of Natural Resources (DNR). This plan provides environmental education and guidance to the Sudden Valley community, on a continuing basis, to assure sound environmental health and safety for plants, animals, and residents with an emphasis on properly managing flora and fauna indigenous to the region.

GOAL 2AA: Recognize Birch Bay, Sudden Valley Provisional Urban Growth Area, and the Columbia Valley/Kendall area as county urban growth areas, not associated with existing cities.

Policy 2AA-1: Work with all parties to resolve the water issue so Birch Bay can develop to its full potential.

Policy 2AA-2: Work with Birch Bay Water and Sewer District and the City of Blaine to resolve the issue of jurisdiction north of Lincoln Road and east of the Semiahmoo development. As a starting premise, assume the area between Lincoln Road and Drayton Harbor to ultimately be part of Blaine but with water and sewer service from the district.

Policy 2AA-3: Re-evaluate the amount and location of area designated as resort commercial and multiple family in Birch Bay, based on the present knowledge of wetlands in the area.

Policy 2AA-4: Recognize the resort nature of Birch Bay and Columbia Valley/Kendall, including the significant second home factor when analyzing land supply for urban growth area boundaries.

Policy 2AA-5: Encourage incorporation of Birch Bay when financial viability can be achieved without including the Cherry Point Industrial Area within proposed city boundaries.

Policy 2AA-6: Recognize the impacts of tourist development on local residents in the Birch Bay, Sudden Valley, and Columbia Valley and provide for mitigation of those impacts.
Policy 2AA-7: Work with all parties to resolve infrastructure and public service issues so that the Columbia Valley/Kendall area can develop to its full potential.

Policy 2AA-8: Study Columbia Valley/Kendall to identify the factors necessary to create an economically viable city, the implications of such development within the County overall, and make recommendations as to how and when incorporation should be initiated.

Policy 2AA-9: Require unplatted areas in Columbia Valley/Kendall to obtain “ability to serve” letters from schools, fire districts, and water and sewer service providers and demonstrate adequate road capacity in order to receive county approval for new subdivisions.

Policy 2AA-10: For new subdivisions, encourage the use of clustering with adequate setbacks along Kendall Creek, Kendall and Sprague lakes, and wetlands to avoid environmental degradation of surface waters, to enhance/restore fish habitat relative to complying with listings under the Endangered Species Act, where they might apply, and to protect the aquifer underlying the Columbia Valley.

Policy 2AA-11: For existing lots in Columbia Valley/Kendall, encourage the use of appropriate stormwater best management practices and connection to public sewer to protect surface waters and the aquifer. Any new building permits on existing lots must be able to demonstrate that the water service is available to provide adequate water as a precondition to the issuance of a permit.

Policy 2AA-12: Work with the homeowner’s associations and the owners of undeveloped tracts in Columbia Valley/Kendall to develop regional stormwater collection and treatment facilities or standards for individual stormwater detention and infiltration facilities, prior to approval of new subdivisions.

Policy 2AA-13: Recognize the need for light impact industrial land uses within the Columbia Valley/Kendall Urban Growth Area. Consider establishing a light impact industrial zone within the long term planning area located on the north side of Limestone Road. Retain the existing zoning within this long term planning area until a master plan has been completed to identify traffic impacts and infrastructure/utility/service needs, and appropriate mitigation measures.

Policy 2AA-14: Preclude additional commercial zoning within the urban growth area until the Small Town Commercial district in Kendall is fully developed and a land supply study demonstrates a need for additional commercial land.

Policy 2AA-15: Facilitate meeting the unique needs of Sudden Valley due to its location within the Lake Whatcom Watershed.

Policy 2AA-16: Recognize the existing parcelization and the commitment for development of the remaining multi-family parcels in Sudden Valley.
Policy 2AA-17: Work with the Community Association towards achievement of the density reduction target of 1,400 lots within the Sudden Valley Provisional UGA.

Policy 2AA-18: If the county acquires lots through tax foreclosure, consider selling them as non-buildable lots.

Policy 2AA-19: Support Water District 10's effort to maintain adequate sewer capacity and control stormwater runoff in keeping with appropriate environmental controls and the Sudden Valley Community Association's density reduction goal.

Policy 2AA-20: Explore alternatives for traffic impact mitigation including:

- enhanced bus service to Sudden Valley

- consideration of some additional commercial and limited light industrial development within existing Neighborhood Commercial and Resort Commercial zones to create a fuller service community to limit shopping and journey to work trips

Policy 2AA-21: Recognize Sudden Valley as a provisional county urban growth area, not associated with an existing city.

Policy 2AA-22: Study Sudden Valley to identify the factors necessary to create an economically viable city, the implications of such development within the County overall, and make recommendations as to whether, and, if feasible, how such action should be addressed.

Policy 2AA-23: Work with all parties to maintain, and appropriately plan for, resolve infrastructure, and public services, and stormwater retention issues so that Sudden Valley area can develop to its appropriate full potential.

Policy 2AA-24: Work with the Sudden Valley Community Association to develop an interlocal agreement prior to Incorporation that will insure that zoning density is not increased after incorporation, that implementation of the density reduction program continues, and that protection of critical areas is equal to or greater than existing County regulations.

Policy 2AA-25: If incorporation has not been accomplished by the end of 2006, a comprehensive plan amendment shall be docketed to consider whether the Sudden Valley Provisional UGA is viable or whether it should be redesignated as returned to a "Recreational Subdivision."