Appendix A

1993 URBAN GROWTH AREA ALTERNATIVES ANALYSIS

INTRODUCTION

This chapter provides detailed analyses of the four urban growth area (UGA) alternatives considered for Lynden. The four alternatives suggest differing quantities of land for inclusion in the urban growth area. Selection of the most appropriate UGA is critical for the City as a factor for determining which county land will eventually face incorporation. Alternatives one through three assume nearly identical urban growth areas, except for differing boundaries to the northwest of the City.

Anticipated impacts cited in this chapter are based on the assumption that the projected 2022 population of 16,900 is accurate for Lynden. The City must plan to accommodate that growth and all related infrastructure to serve the population and include a reasonable market factor to keep land affordably priced.

Each of the first three alternatives contains a large area of land just east of the current City limits. This land has been identified as prime agricultural land by the Soil Survey of Whatcom County. Despite the prime agricultural designation, the site was determined to be appropriate for rural residential use by the Whatcom County Planning Department, and therefore was included in the first three urban growth area alternatives. Alternatives two and three also contain marginally prime agricultural land to the northwest of the City; however, that area is designated for agricultural use by the County.

The tables included in the following alternative analyses illustrate potential build out and density levels throughout the City. The following analyses illustrate the additional land supply that each UGA alternative would supply. Estimated density figures for the three alternatives provide comparative basis for analyzing the alternatives, although actual densities will likely be higher following further reductions for sensitive areas, parks and schools.

ALTERNATIVE 1 – COUNTRY – “Of or Pertaining to rural areas”

The COUNTRY alternative would provide the City of Lynden with the largest amount of land to accommodate the increased population level expected in the year 2022. With the addition of land between Benson Road and the Guide Meridian, this alternative would permit the City to continue providing affordable land within the confines of the City. The COUNTRY alternative would additionally benefit the City by providing the opportunity for creation of a comprehensive drainage system in the area between Benson Road and the Guide Meridian. That area contains the only marginally prime agricultural lands surrounding City limits. As land in the urban growth area is annexed to the City, developers of planned housing developments may be awarded density bonuses if plans include open space and park facilities for use by community members. Planned developments also create the opportunity for flexible housing styles and attractively landscaped neighborhoods.

There are several potentially negative impacts that could result from designating such a large Urban Growth Area surrounding the City. The most serious impact is the possible rezone of agricultural lands for residential, commercial, and industrial uses. Lynden may experience a slight decrease in revenue earned from agriculture production if this alternative is adopted. The loss of agricultural land may also impact various mammal and bird habitats.

Sprawling development might increase as a result of selecting Alternative 1. By including more land in the UGA, annexation may become preferable to infill for accommodating population
growth. As new areas are annexed, single family developments will increase, but housing densities will remain low. Public services and utilities will require expansion to cover the additional land area consumed.

The Urban Growth Area is currently protected by Fire District #3 and the County Sheriff’s Department; but as areas are annexed to the City, Lynden police and fire services will require extension to those areas. Water associations supplied by the City currently provide water to some areas within the UGA, but any incorporations will require sewer facilities to be extended to those areas as well. The school bus system and other services will also require expansion to accommodate the larger UGA. By providing a large expanse of developable land, the City helps to promote single family development, placing excess pressure on public facilities. By providing slightly less land in the UGA, the City could encourage multi-family development which is more cost effective and less land consumptive than single family development.

Conversely, the historical character of Lynden might be better preserved by selection of Alternative 1 which would likely distribute population in the traditional manner, in new development consisting of mostly single family residences. This alternative might enable the community to adjust to population growth while providing the City with options for comfortably accommodating growth within the existing City limits. The following table illustrates the estimated acreage per land use for the City if alternative 1 is adopted.

Table A: Country Alternative - Estimated Residential Build Out

<table>
<thead>
<tr>
<th>Zone</th>
<th>Acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing Residential</td>
<td>1832.96</td>
</tr>
<tr>
<td>Future Residential</td>
<td>1173.48</td>
</tr>
<tr>
<td></td>
<td><strong>3006.44</strong></td>
</tr>
<tr>
<td>Existing Commercial</td>
<td>389.84</td>
</tr>
<tr>
<td>Future Commercial</td>
<td>98.92</td>
</tr>
<tr>
<td></td>
<td><strong>488.76</strong></td>
</tr>
<tr>
<td>Existing Industrial</td>
<td>199.30</td>
</tr>
<tr>
<td>Future Industrial</td>
<td>240.00</td>
</tr>
<tr>
<td></td>
<td><strong>439.30</strong></td>
</tr>
<tr>
<td>Future Commercial/Industrial Mix</td>
<td>80.00</td>
</tr>
<tr>
<td>Public and Quasi-Public Lands</td>
<td>93.26</td>
</tr>
<tr>
<td>A-1 Holding</td>
<td>49.14</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>4157</td>
</tr>
</tbody>
</table>

Total Gross Acreage: 4157

Estimated Units Per Acre in COUNTRY UGA: 2.14*

*Based upon 880.11 net residential acres, after expected infill of current residential land and reductions for right-of-ways.
Source: Lynden Planning Department, 2004.

ALTERNATIVE 2 – CITY – “An incorporated municipality with definite boundaries and significant size.”

The CITY alternative, suggesting more compact urban boundaries, requires the least conversion of agriculture land to urban uses. The provision of a smaller UGA would result in more high density housing and would promote greater infill development within the City. This alternative
makes less land available for development because the northwest boundary of the CITY alternative is at Benson Road instead of continuing further toward the Guide Meridian, as is suggested in the COUNTRY and TOWN alternatives. In all other directions, boundaries are the same for the three alternatives. Restricting the size of the UGA in this manner would reduce urban sprawl, preserving more land for agricultural uses which are considered by many to be the core of Lynden's economy.

Although the CITY alternative would help to preserve agricultural lands, negative impacts could become apparent as the population grows and adequate land for residential development is not available. As the land supply decreases, areas currently zoned for single family development may need to be rezoned for residential multi-family use. An insufficient land supply would likely affect residents' ability to find affordable housing. If the cost of land increases, development costs will also increase, and higher construction costs will be passed on to home buyers and renters.

As a result of infill and denser living conditions there may be heightened incidence of crime in the City. If this occurs, additional emergency related systems may necessary. Other public services and utilities would also be impacted as a result of increased density levels. The City's existing infrastructure would likely be strained and in need of upgrades, and increased traffic congestion might require installation of additional traffic signs and signals.

Adopting this alternative would likely increase multi-family residences above the expected number of units, resulting in changes in the social structure of the community. Single parent families appear to be more likely to reside in affordable multi-family developments, such as apartment complexes. Consequently, school facilities may be impacted due to additional children requiring special attention, added assistance or disciplinary action. Increased daycare facilities and after school programs may also be necessary. Positive impacts associated with high-density housing include opportunities for development of varied, creative and affordable housing types within the City.

Despite greater preservation of agricultural land, adoption of this alternative would adversely affect the community by the concentrating increased density in a central location. Greater infill required to accommodate the larger population will decrease opportunities for open space and City parks. As residential and commercial developments grow in size, and areas of impermeable surface materials are expanded, higher levels of runoff may enter and pollute local streams. A decreasing land supply within the City may also cause housing and land prices to escalate. By selecting this alternative, the City would in effect protect agricultural land with the consequence of altering the historical charm and character of the city. Table 20 illustrates the estimated acreage, by land use, for Lynden suggested by this alternative.

<table>
<thead>
<tr>
<th>Zone</th>
<th>Acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing Residential</td>
<td>1832.96</td>
</tr>
<tr>
<td>Future Residential</td>
<td>543.48</td>
</tr>
<tr>
<td></td>
<td>2376.44</td>
</tr>
<tr>
<td>Existing Commercial</td>
<td>389.84</td>
</tr>
<tr>
<td>Future Commercial</td>
<td>98.92</td>
</tr>
<tr>
<td></td>
<td>488.76</td>
</tr>
<tr>
<td>Existing Industrial</td>
<td>199.30</td>
</tr>
<tr>
<td>Future Industrial</td>
<td>240.00</td>
</tr>
<tr>
<td></td>
<td>439.30</td>
</tr>
<tr>
<td>Future Commercial/Industrial Mix</td>
<td>80.00</td>
</tr>
</tbody>
</table>
Public and Quasi-Public Lands 93.26
A-1 Holding 49.14

Total 3527

Total Gross Acreage: 3527
Estimated Units Per Acre in CITY UGA: 4.62*

*Based upon 407.61 net residential acres, after expected infill of current residential land and reductions for right-of-ways.
Source: Lynden Planning Department, 2004.

ALTERNATIVE 3 – TOWN – “A population center, bigger than a village and smaller than a city”

The Town alternative was developed to strike a balance between alternatives one and two. This alternative proposes that a section of land, between Benson Road and the quarter section line between Benson and Double Ditch Roads, be included in the Urban Growth Area. The additional land should provide the City with enough area to expand urban growth, without requiring significant amounts of agricultural land to be rezoned. The City could then maintain a reasonable population density within the City limits. There may be an early, short term developmental tendency to sprawl as a result of adopting this alternative; however, long term effects would be limited and excessive housing costs prevented. Public facilities and services may require enlargement and expansion, but not to the extent anticipated if either alternative one or alternative two were selected.

Lynden’s agricultural industries could be expected to prosper as a result of selecting the TOWN alternative; and the service, retail and commercial sectors would also likely benefit. An appropriate mixture of land uses within the City, as this alternative suggests, would be advantageous to the community in general. Although permeable land will likely decrease within the City, land annexed and developed as planned residential areas could be designed to include open space areas and parks. Some areas will experience increased congestion, but generally traffic will be limited to retail, commercial and industrial areas. Single and multi-family developments will expand into a limited area designated for residential uses, but will also continue to infill vacant areas within the City.

The TOWN alternative addresses impacts of population growth while balancing the need for new development with community desires to preserve the aesthetics and historic character of Lynden. The following table illustrates expected acreage per land use. The Town Alternative will increase density throughout Lynden, but at level more consistent with the current density than either Alternatives One or Two.

Table C: Town Alternative - Estimated Residential Build Out

<table>
<thead>
<tr>
<th>Zone</th>
<th>Acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing Residential</td>
<td>1832.96</td>
</tr>
<tr>
<td>Future Residential</td>
<td>712.07</td>
</tr>
<tr>
<td></td>
<td><strong>2545.03</strong></td>
</tr>
<tr>
<td>Existing Commercial</td>
<td>389.84</td>
</tr>
<tr>
<td>Future Commercial</td>
<td>80.71</td>
</tr>
<tr>
<td></td>
<td><strong>470.55</strong></td>
</tr>
<tr>
<td>Existing Industrial</td>
<td>199.30</td>
</tr>
<tr>
<td>Future Industrial</td>
<td>318.71</td>
</tr>
</tbody>
</table>
Public and Quasi-Public Lands  |  93.26
A-1 Holding                  |  49.14

**Total**                    |  3676

Total Gross Acreage: 3676
Estimated Units Per Acre in TOWN UGA: 3.52*

*Based upon 534.05 net residential acres, after expected infill of current residential land and reductions for right of ways.
Source: Lynden Planning Department, 2004.

*Note: In the Land Capacity Analysis section of this Comprehensive Plan, land uses are more precisely specified, and further reductions clearly explained. Consequently, the density figures in the analysis are significantly higher, and more accurately represent predicted land uses.*
PREFERRED ALTERNATIVE - TOWN

Introduction

Following a public comment period in the early 1990s, the Lynden Planning Commission was instructed to recommend a preferred alternative for the final urban growth. An implementation plan was then sent to the Department of Community, Trade, and Economic Development for review and comment.

At the Planning Commission hearing of August 3, 1994, the Planning Commission chose Alternative 3 -- TOWN, as the preferred UGA alternative. Reasons given for the decision to select Alternative 3 for the Land Use Element are as follows:

1. Alternative 3 comes closest to meeting the goals set forth in the Vision Statement of preserving agricultural land and maintaining the community character.
2. Alternative 3 directs growth within incorporated areas and requires some infill as stated in the Growth Management Act.
3. Alternative 3 will benefit economic development within the City.
4. Alternative 3 will continue the Lynden Social and Spiritual Community values.
5. Alternative 3 will protect the environment and agricultural lands.
6. The City has the capability of providing adequate services to the additional area.
7. Town will provide parks and greenbelts.
8. The City will be able to adjust for the projected population, but in a controlled area.
9. By not including the entire northwest section the City will not be required to repair and improve the intersection of East Badger and Double Ditch Road.

The TOWN Alternative was recommended for approval by the Planning Commission with the addition of land just south of the Birch Bay-Lynden Road, west of the Guide Meridian, and bound to the south by a quarter section line. Commission members felt this was a logical extension of the boundaries for Alternative 3 due to the existing businesses, the need for services by landowners and the defined boundary for this area.

The Planning Commission expressed concern regarding the possibility of development in the northwest section between the Guide Meridian and the boundary proposed under the TOWN alternative. They stated that these boundaries should be reviewed at least every five years and that joint planning should take place to ensure that Lynden's goals for meeting the Growth Management Act are met.

To maintain consistency with county wide planning processes and polices, the following summaries are included from "Whatcom County: The Next Generations." The Next Generations is the County's preliminary Visioning Statement and was published along with the County's land use alternatives in a brochure called Your Community, Your Choice, Whatcom County, The Next Generations, in March, 1994.

The following summaries are supplemental to the County Wide Planning Policies found in the appendix of this document.

Urban Growth

The County Visioning Committee discourages urban sprawl by encouraging infill within areas that already receive sewer, water and other public utilities. While discouraging urban sprawl the County is also trying to promote the retention of "individual town and community character," which conflicts with the control of urban sprawl of the City of Lynden, requiring creative land use policies. The County would also like to preserve the rural atmosphere of Whatcom County and direct the cost of growth, including infrastructure, first towards developers, then towards cities and public agencies.
Housing
Affordable housing, both rented and owned, is of concern to the County Visioning Committee. This committee has estimated the mean housing value to be approximately $90,000. The County encourages affordable housing to be scattered throughout the county and be a mixture for a variety of age and income level occupants.

Natural Resource Industries
Natural resource industries are a high priority for the County and are encourage to continue and be protected. Natural resource industries are classified as: agricultural, forestry, fishery, and mining. Farmers are also given priority for receiving water.

Economic Development
Industrial development is encouraged to continue and grow as a means of building a "stable local economy." Free market solutions are to be used to solve economic development problems and natural resource jobs are to be protected as another means of sustaining a viable economy throughout the Whatcom County.

Open Space and Recreation
The Visioning Committee recommends that open space areas and areas for recreation be included in plans for future developments as well as conservation efforts to conserve fish and wildlife habitats. Funding for open space is to encouraged to come from county and state funds and other appropriate sources.

Land Use / Zoning
The Whatcom County Visioning Committee requests zoning to be consistent and predictable for developers, however, zoning should also be flexible to change when directed by the proper authorities. Zoning should also conform to the best and most flexible use of land.

Analysis of Preferred Alternative – TOWN
The Washington State Growth Management Act (GMA) requires cities to address the elements of their growth that have the potential to be affected by increases in population. Issues related to land use, housing, capital facilities, transportation and utilities all need to be examined in relation to projected population increases and land requirements for accommodating potential growth. In addressing these issues, through the Comprehensive Plan, the cities are required to work with their counties to design and adopt urban growth areas (UGA's) which are designated to accommodate a city's projected growth over the next twenty years.

Whatcom County is mandated with the responsibility to establish the proposed urban growth boundaries of the cities within its borders. The criteria involved in the County's decision process include the County Wide Planning Policies, which set extensive guidelines for designating a city's UGA, as well as considerations from the County's Visioning process and input from the City of Lynden through the submittal of the Draft Comprehensive Plan. Even though Whatcom County established the proposed UGA's for Lynden, Lynden itself retains the responsibility to analyze and recommend the UGA that best satisfies the requirements of its future growth needs.

Lynden's evaluation process of its proposed UGA alternatives includes considerations of Lynden's vision statement "Lynden 2024, A Vision for the Community", the County Wide Planning Policies, City staff, citizen involvement through advisory boards and open public forums, the Planning Commission and the City Council. Factors involved in the City's analysis and determination process include: 1) the types, availability and allowable uses of land within each proposed UGA, 2) projected population growth and housing demands, 3) maintaining densities
that are consistent with the vision of the City and that promote the continuation of Lynden's community character, 4) environmental impacts of growth; the City's ability to provide services as growth occurs, and 5) effects on the surrounding community; economic development and impacts of transportation issues.

The four proposed UGA alternatives under consideration by the City of Lynden are described as follows. **COUNTRY**, of or pertaining to rural areas; **CITY**, an incorporated municipality with definite boundaries and significant size; **TOWN**, a population center, bigger than a village and smaller than a city; and NO ACTION, where the City would not adopt an urban growth area, and will continue planning as done in the past. This last alternative, although required by the State Environmental Policy Act (SEPA), is not a viable growth alternative under GMA, therefore, further consideration of this alternative is negated. The specifics of these alternatives are discussed in the previous chapters of the Land Use Element of the Comprehensive Plan.

Through the assessment of these alternatives, and in relation to community vision, density and land requirements necessary to fulfill the City's impending growth needs, the City of Lynden approved Alternative 3, **TOWN**, as its preferred alternative for future growth.

**Land Use**

How Lynden envisions itself in the future is a major factor for determining its prospective land needs. Through extensive public involvement, the City composed a vision statement for its future growth which encompasses factors that contribute to its character and translate into future land use requirements. The vision statement's main objective is to sustain the City's community spirit, small town atmosphere and agricultural roots. Lynden's choice of a particular UGA, as it relates to its future land needs, has the ability to either enhance or detract from the City's character. This is why the **TOWN** alternative was chosen as the preferred alternative. It is seen as the best option to maintain preferred density levels, which is a method of preserving the City's small town atmosphere, affording the City the ability to attain its vision for the community.

In accordance with County Wide Planning Policies and GMA goals, both cities and existing urban areas of Washington State are required to absorb additional population densities within the counties. Projected population increases for Whatcom County include anticipated future populations of 234,917 people by 2022. This requires cities to plan for a future land base to accommodate this projected population growth.

The **TOWN** alternative provides Lynden with an estimated 1111.49 total acres of additional land, expanding the City's total gross acreage to 3676. This allows the City to accommodate future growth without the inclusion of excess lands that may lead to sprawl. Map 6 shows current City limits and the **TOWN** alternative boundaries and Map 7 shows the land use designations for these areas.

Existing land included in the area defined under the **TOWN** alternative is described by Whatcom County as agricultural in character. Current Whatcom County classifications for this land include Agricultural; Rural with one dwelling unit per two acres; Rural with one dwelling unit per five acres; Urban residential with four dwelling units per acre; and Neighborhood Commercial.

Land within the UGA will be converted to urban use through annexation and development, this will be done as the growth of the City of Lynden necessitates. Proposed land uses under this conversion will allow for residential densities up to 6 units/acre; mobile and modular homes; travel and recreational vehicles; community shopping zone 2; community shopping zone 3; industrial district 1; and industrial district 2. Table 22 shows the land use acreages for the City of Lynden using the **TOWN** option.

**TABLE D: Analysis of Land Use for Lynden in the UGA TOWN Alternative.**
<table>
<thead>
<tr>
<th>LOCATION</th>
<th>ACRES</th>
<th>LAND USE</th>
</tr>
</thead>
<tbody>
<tr>
<td>West Lynden</td>
<td>45.52</td>
<td>Residential</td>
</tr>
<tr>
<td></td>
<td>95.88</td>
<td>Commercial</td>
</tr>
<tr>
<td></td>
<td>240.00</td>
<td>Industrial</td>
</tr>
<tr>
<td></td>
<td>80.00</td>
<td>Comm/Ind. mix</td>
</tr>
<tr>
<td>N.W. Corner</td>
<td>150.00</td>
<td>Residential</td>
</tr>
<tr>
<td>East Lynden</td>
<td>468.55</td>
<td>Residential</td>
</tr>
<tr>
<td></td>
<td>9.62</td>
<td>Modular Housing</td>
</tr>
<tr>
<td></td>
<td>19.79</td>
<td>Travel &amp; RV</td>
</tr>
<tr>
<td></td>
<td>2.13</td>
<td>Commercial</td>
</tr>
<tr>
<td><strong>Total Acres</strong></td>
<td><strong>1111.49</strong></td>
<td></td>
</tr>
</tbody>
</table>

The conversion of land use within the UGA has the potential to adversely affect both the City of Lynden and Whatcom County in the following ways:

- Increases in density beyond the level determined by the City can detract from Lynden's small town atmosphere.
- Conversion of agricultural land, without efforts to mitigate urban impacts on the surrounding farming community, can lead to a shift in this farming tradition to other rural centers.
- Inflated housing prices may be realized by both the City and County through housing densities and growth patterns that are not consistent with community goals.
- The City and County may see an increase in unwanted impacts, including changes in the rural character for the area and the potential loss of natural resource lands to growth.

The justification for this land conversion is that, under GMA regulations, the counties and cities are required to designate areas in which urban growth may occur, allowing for density levels sufficient to accommodate the projected population growth for the succeeding twenty-year period. The City of Lynden approved the TOWN alternative in an effort to maximize the positive and minimize the negative impacts that the conversion of land in the UGA could have on the surrounding community. The City's justification for this land use lies both with the GMA and the vision for the community. The City requires land for growth, and the TOWN alternative contributes the most to the desired growth patterns prescribed through its vision statement while, at the same time, it achieves the highest level of compliance with the goals of the GMA.

**Housing**

Housing costs, densities and availability are prime concerns for the City of Lynden. The City's expansion into the UGA will help control housing costs by maintaining adequate levels of housing stock and land available for housing development. Without this expansion, the City would quickly reach full build-out capacity. This could create a housing shortage, forcing the City to increase densities beyond acceptable levels in order to accommodate growth. A housing shortage, and density increases inconsistent with target levels, would translate directly into higher real estate values. This would force up the costs of housing in the City and effectively eliminate any affordable housing options, particularly for single-family home ownership possibilities.

**Density**
Maintaining specific density levels is a goal set out by the GMA. This requirement keeps development within the boundaries of a city, where services currently exist, and then allows for expansion into areas that are within a city's adopted UGA. Lynden has set a density goal of an average of 5 units/acre. Lynden currently experiences an average housing density of 2.14 units/acre. By implementing the TOWN alternative, Lynden will achieve an average density of 5.82 units/acre by the year 2022.

With five residential zoning districts, the City adds versatility, increases overall density and is better able to accommodate current building trends. This new structure works very well with the TOWN alternative by providing a balance between the land included in the UGA and the densities outlined in the zoning ordinance, allowing the City to reach its density goal.

Planning for future growth requirements with the adoption and implementation of the TOWN alternative; with the application of GMA requirements including regular review and adjustments as necessary to the Comprehensive Plan, the City will be in a position to better manage its population growth and housing densities. The adoption of the TOWN alternative will also permit Lynden access to the land necessary to maintain sufficient housing densities, which will permit growth without sacrificing the availability of affordable housing options.

**Population**

Lynden's population projections are based on historic growth rates compiled by ECONorthwest and an agreed upon percent of the County's population projection. The County's estimates are a combination of the projections of ECONorthwest, the Office of Financial Management, local experience, and were adopted through the public participation process for the County Wide Planning Policies.

Population projections for the City are derived from the County's population forecasts by ECONorthwest. This allows the City to plan for adequate land requirements by applying residential population/land densities to projected population increases for the 20-year life of the Comprehensive Plan. With this information, the City is able to make accurate predictions of its future land requirements, as well as further examine all of the UGA alternatives for fit and compliance to the goals set forth by the community.

Lynden's projected population is expected to increase from 10,010 in 2004 to 13,573 in 2012, and 16,900 in the year 2022.

By adopting the TOWN alternative, and applying it to the projected population for the City, Lynden can accommodate its future population growth without all of the concerns that surround the other two alternatives. Densities and community character will remain consistent with community goals, sprawl will be effectively eliminated, and considerations toward economic growth, pollution and crime should not be required beyond what is outlined in the Comprehensive Plan.

**Environment**

Disregard of environmental concerns within the UGA has the potential to adversely affect both Lynden's and Whatcom County's land and water resources. Lynden's primary concerns include water quality issues of Fishtrap and Kamm Creeks, protection of natural resource lands within and surrounding the UGA, preservation of wildlife habitat and open space areas, and pollution and water table issues.

The only identified type of natural resource land in Lynden's three proposed UGA's is agricultural in nature. Agricultural resource lands that exist within a given UGA will be lost as annexation and
development takes place. The City's best protection efforts in this area will be to annex land only as growth dictates and to prevent leapfrog development which can promote accelerated growth in particular areas and specific directions. Lynden further protects natural resource lands by limiting the size of its UGA with the choice of the TOWN alternative. Regulations on the development of land within the UGA also offers protection to natural resource lands outside the UGA by setting boundaries on the City's growth, beyond which urban development cannot occur.

One method to mitigate the impacts of development on natural resource lands is to ensure the City follows development goals of infill within previously developed areas prior to expansion into the UGA. As annexation occurs, dedication of lands for open space, parks, trails and conservancy lands will be another method to protect natural resource areas within the UGA. Although this method will not protect these lands in their existing state, it will allow the City to keep in perpetuity these lands as open space and public recreation/educational resources.

In a worst case scenario, at full buildout potential of the UGA, the preservation of natural resource lands as open space will be limited by the dedication of resource areas as development takes place. Therefore, it is vital for the City to both recognize the need, and to plan for these facilities prior to development. Once this land is lost, it is cost prohibitive to reclaim in quantities necessary to provide for recreational and preservation opportunities. The preservation of lands for parks, trails and open space will also provide for limited wildlife habitat protection within the UGA.

A large part of the mitigation of environmental concerns lies in the identification of problems and/or potential problems. By following the guidelines of the GMA, SEPA, and the Shoreline Management Program (SMP), Lynden can effectively act towards resolution as environmental issues arise, instead of reacting in a "fire fighting" manner to only control a potentially detrimental situation.

Potential effects pertaining to water related issues in the proposed UGA's are twofold. First; water quality issues must be addressed. Annexation will allow development into the UGA that can carry both short and long term negative impacts. Development can add increased levels of siltation in the waterways through runoff from construction sites and increases in impervious surface areas. In an effort to mitigate the effects from development and growth, the City has adopted the Puget Sound Stormwater Management, Best Management Practices; maintains bulk regulations in lot development; and requires, the construction of mechanisms such as diversionary swales and oil separators to trap sediment and pollutants prior to the release of runoff water into local waterways. Second; water tables in the additional land included in the COUNTRY alternative are typically high and can have negative impacts upon construction, particularly upon housing structures that wish to, or that have, incorporated basements into their design.

By choosing the TOWN alternative, Lynden recognizes both its need and potential for growth in conjunction with its responsibility to protect the environment. The balance between growth, density levels, loss of natural resource lands within the UGA, the quantity of land required for sufficient growth, and its ability to mitigate environmental concerns, as listed previously, makes it the logical choice of all the proposed alternatives. Environmental concerns include the protection of natural resource lands both within and surrounding the UGA, the protection of wildlife habitat within these areas, as well as air, water and ground pollution concerns for the area as a whole.

Utilities and Capital Facilities

The ability to provide utilities and capital facilities is of paramount importance before growth into the UGA can occur. Considerations which need to be addressed prior to development are concurrency, costs, right-of-way corridors and effects of new service areas on existing systems as it relates to system capacities and level of service standards. Future need forecasts have
been developed and costs of upgrades and extensions are included in a comprehensive study of services required for future development areas. All of these conditions have been previously discussed within their elements of the Comprehensive Plan and are being considered here for their relation to the TOWN alternative.

The relationship between these aspects of development, as they apply to the TOWN alternative, has been studied for concurrency and levels of service applicability. This examination, combined with density requirements and community goals, have led the City to choose the TOWN alternative as its preferred UGA since it most effectively meets the City's ability to provide services to potential future development; both within existing City limits as well as in the UGA as it is annexed and developed.

The TOWN alternative best matches the City's ability to provide services to the demand that will be created by this alternative, both in projected volumes as well as in the actual provision of extensions and services as development takes place.

**Economic Development**

For a city to remain viable in today's economy it must have room for expansion of its economic sector. For Lynden, this includes the extensive agricultural contributions to its economic base, as well as the contributions from its retail, industrial and commercial sectors.

Washington's GMA requires cities to protect their surrounding natural resource industries, a provision that includes productive agricultural lands. Lynden, being surrounded by prime to moderate agricultural lands, is confronted with a challenging set of circumstances as it seeks to find a balance between the land required for its inevitable growth, the sustaining of its economic development, and the retention of its community character.

With agricultural industries playing such a large role in the City's economic base, the protection of this land, and industry as a whole, is imperative for the community. Methods to mitigate impacts of development on this industry include a right-to-farm ordinance, inclusion of zones designated for agricultural related businesses and the adoption of a particular UGA alternative itself. All of these methods, either separate or in combination, will work to achieve a balance of land uses for the City, and are all driving factors in the City's decision process towards the selection of the TOWN alternative as its preferred UGA.

Zoning and commercial centers planning are two other methods the City employs to support the overall standing of its economic community. In zoning, the development of Lynden's land use map, as it applies to both the existing and potential City limits as outlined by the UGA, specifies the zones in which economic activity can take place. By carefully planning these zones the City can effectively insulate various aspects of Lynden's economic community from its residential population, while at the same time allow for the interaction necessary to promote increased economic activity in and for the community.

Lynden is seeking, through the Downtown Development Plan, to define the role its downtown area will play in the City's economic future, as well as how the City's various retail and commercial centers will interact. The overall goal of this plan is to outline the criteria and actions necessary to maintain a vigorous downtown.

With the annexation of West Lynden, in March of 1994, the City gained valuable lands which are zoned for commercial and industrial uses. Within the implementation of the TOWN alternative, the City will designate an additional 320 plus acres of land for retail, commercial and industrial development. The impact of this action on Lynden's job and tax base is seen as positive, giving the City the land necessary for it to realize continued growth in its economic sector.
Lynden’s designation of the TOWN alternative for its UGA provides the City access to the additional land it requires for future economic growth. With its core industrial and downtown retail areas almost saturated, and future growth predicted for Lynden's economic sector, the City is in need of additional lands to promote future economic growth. This, while maintaining a balance between its goals towards density requirements, environmental concerns, the stability of its downtown economic sector, the growth of other designated commercial and retail centers and continued community character all point to the adoption of the TOWN alternative for Lynden's future development.

Community Character

The City prides itself in being a close knit community with a small town atmosphere, historical cultural resources and a high standard of living. The character of the City is further enhanced through the aesthetics of tree lined City streets and the quality of its parks and trails system, both of which give an open and spacious feel to the City. Protection of these components is seen as essential for Lynden and is reinforced through many of the elements of the City’s Vision Statement.

The aesthetics of the community are further enhanced through the actions of Lynden's Design Review Board. This citizen board was established by the City Council to ensure the compatibility between multi-family residential structures and surrounding residential neighborhoods, that the buildings within the Historical Business District are consistent with the Dutch/European theme, and that commercial structures are compatible with surrounding areas and land uses.

The application of the COUNTRY alternative may have the effect of separating the community, since the quantity of land it offers has the potential to create "pocket communities" within the City. This clearly is in opposition to the goals set fourth by the City.

If the CITY alternative is chosen, the increased populations concentrated within a smaller land base could raise density levels beyond that of the goal for the City. This would have a severe negative impact on the character of the community as laid out above.

The aesthetics, the cultural and historic qualities of its Dutch/European heritage and the "community environment" will all be served by the application of the TOWN alternative. By adopting this alternative, the City is allowing itself access to the land it requires to retain its small town character. This is further enhanced through the City's ability to maintain a moderate and consistent population density throughout the community, including within the UGA. The continuation of the Dutch/European theme throughout the City will also help to consolidate the community character of the City.
Transportation

Growth is expected to continue in Lynden at a steady pace. With this, issues of public transportation, traffic volumes, pollution and alternative transportation modes must be addressed, especially as they relate to the City's expansion into the UGA.

With the implementation of the TOWN alternative, the City will achieve a reasonable balance between traffic, growth, and the retention of its community character. The extent of the land involved in this alternative will allow the City the ability to effectively offer transportation services to its developing areas, mitigation of increased traffic flows through its downtown core and lessen pollution concerns and vehicle/pedestrian interaction.

CONCLUSION AND IMPLEMENTATION

Through the assessment of the four proposed alternatives, and in relation to density and land requirements necessary to fulfill the City's future growth needs, The TOWN alternative is seen as the City's predominate choice for the following reasons:

- The TOWN alternative comes closest to meeting the goals set fourth in the Vision Statement of preserving agricultural land while maintaining the desired density level of the City.
- The TOWN alternative requires some infill by directing growth within incorporated areas of the City, as outlined in the Growth Management Act.
- The TOWN alternative will benefit economic development within the City.
- The TOWN alternative will help sustain Lynden's social and community values.
- The TOWN alternative will help foster protection of environmental concerns and agricultural lands.
- Lynden has the capability of providing adequate city services to the area included within the TOWN alternative.
- The TOWN alternative will provide greenbelts.
- The City will be able to adjust for the projected population, but within a controlled area.
- By not including the entire northwest section, as outlined in the COUNTRY alternative, the City will not be required to repair, improve and maintain the intersection of East Badger and Double Ditch Roads.

The City of Lynden, having chosen the TOWN alternative as its preferred alternative for growth, needs to have in place measures to implement the City's growth strategies as it expands into the UGA. During this expansion process the City needs to balance the goals stated in Lynden's Comprehensive Plan to the parameters for growth that are outlined by the GMA.

The implementation of the TOWN alternative will be achieved through a variety of measures, most notably, through the application of the relevant strategies from the Implementation Strategies document for Lynden's Comprehensive Plan. Additional implementation tools will include annexation policies and interlocal agreements between Lynden and its surrounding communities, as well as applicable elements from the City's Comprehensive Plan, Whatcom County's Comprehensive Plan, County Wide Planning Policies and the requirements of Washington State's Growth Management Act.

With this implementation, the City's goal of controlled growth while allowing for projected population increases, maintenance of density requirements, preservation of community standards, protection of ecological concerns, provisions for economic development and a variety of housing types, along with the City's ability to provide services to areas as growth occurs, should all be achieved in a timely and efficient manner.