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Whatcom County P&DS

September 16, 2009

**VIA HAND DELIVERY**

Whatcom County Council  
311 Grand Avenue  
Bellingham, WA 98225

Whatcom County Planning Commission  
5280 Northwest Drive  
Bellingham, WA 98226

- RE: 1. County Urban Growth Area Update – Capital Facilities Plan Requirements – RCW 36.70A.070**
- 2. County Comprehensive Plan Update – Birch Bay Urban Growth Area – Level of Service and Capital Facilities Plan – Birch Bay Community Plan Amendment**

Dear Council Members and Planning Commissioners:

We are pleased to report to the County Council and the Planning Commission that Whatcom County Fire District No. 21 (the "District") has completed and adopted (following SEPA review) its Capital Facilities Plan ("CFP") as requested by the County Council, following a public outreach process as requested by the County Planning Commission. *See District Commission Resolution 2009-13, adopting the District Capital Facilities Plan, attached thereto with accompanying exhibits.* The District submits to Whatcom County the District's adopted CFP and related appendices to be included in the County Comprehensive Plan updates as part of the County's Urban Growth Areas ("UGA") updates.<sup>1</sup> The County's inclusion and adoption of the District's CFP as part of the County Comprehensive Plan, and implementation of the conditions of this plan, which includes the implementation of the revised mitigation fee schedule, will provide for GMA compliance on these issues, including RCW 36.70A.070 (3) related to capital facility plans for fire protection services within UGAs.

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<sup>1</sup> The District previously submitted a draft of the Capital Facilities Plan to the County as part of its June 22, 2009 combined DEIS Comments and UGA comment letter. That letter and the materials submitted therewith are to be part of the record, and if have not been included in the record to date, are incorporated by reference herein.

*Providing quality service for a safe community*

## REQUESTED ACTION

The District requests that the County initially take the following two actions as part of its Urban Growth Area update:

- (1) Include the District's Capital Facilities Plan as part of the County's Comprehensive Plan, including the levels of service for urban and rural areas included within the Capital Facilities Plan; and
- (2) Revise the Birch Bay Community Plan eliminating the 4-6 minute response time level of service "gold" standard, and the references to the financing plan dependent on future tax revenues. The proposed amendments would correct inaccuracies contained in the Birch Bay Community Plan regarding the District's ability to provide urban levels of fire protection and emergency service to the Birch Bay UGA.

The requirements of RCW 36.70A.070 (3) (a-d) would be met upon the County's adoption and implementation of the District's CFP and mitigation fee schedule which includes by reference the background Facilities and Capital Needs Assessment, and revises the level of service standard and capital facility plan in the Birch Bay Community Plan to be consistent with the District's CFP.<sup>2</sup>

## SUMMARY

### 1. Capital Facilities Plan inclusion in County Comprehensive Plan

The County's Comprehensive Plan requires a GMA-compliant capital facilities plan, and requires 4 basic elements as follows: (a) An inventory of existing capital facilities owned by public entities, showing the locations and capacities of the capital facilities; (b) A forecast of the future needs for such capital facilities; (c) The proposed locations and capacities of expanded or new capital facilities; and, (d) At least a six-year plan that will finance such capital facilities within projected funding capacities and clearly identifies sources of public money for such purposes. See RCW 36.70A.070 (3) (a-d).

As they relate to fire and emergency response services and the UGAs within the District, these 4 basic elements of a capital facilities plan do not exist in the current County Comprehensive Plan or the Birch Bay Community Plan as required by the GMA.

The District's CFP, if adopted and fully implemented by Whatcom County, would cure the existing deficiencies in the County's Comprehensive Plan by correcting factual errors in the existing Birch Bay Community Plan, and by providing the County with a CFP that complies with the 4 basic elements required by the GMA to be included in the County Comprehensive Plan.

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<sup>2</sup> The draft Capital Facilities Plan necessarily includes all appendices. The appendices are critical and material aspects of the financial plan component of the draft Capital Facilities Plan required by the GMA. If these appendices, including the Mitigation Fee Schedule, are not adopted as part of the County's Comprehensive Plan and implemented by the County through its SEPA Policies, Concurrency regulations, or development approval criteria, then the County would continue to be in violation of the GMA.

Such actions will eliminate potential challenges to the County's Comprehensive Plan and the UGAs within the District.

## 2. Amendments to Birch Bay Community Plan

As noted above, and previously, the Birch Bay Community Plan component of the County's Comprehensive Plan includes material and indisputable errors. Correction of these errors must be made in this UGA update process for the Birch Bay UGA to survive scrutiny and review. Urban growth is to be located where urban governmental services (which include by definition fire protection services) exist or are planned for with adequate projected financing for necessary capital facilities. If the Birch Bay Community Plan is not revised, and the District's CFP is not adopted and implemented, then the County's Comprehensive Plan and Development Regulations, including the Birch Bay UGA, will be out of compliance with the GMA. Attached hereto is a summary of the necessary revisions to the Birch Bay Community Plan.

The 4-6 minute response time called for in the Birch Bay Community Plan is unattainable today and in the future. The approximately 8 minute response time planned for in the District's CFP is only attainable with outside funding given the revenue generation limitations imposed by the Washington State Legislature on Fire Districts. Without outside funding from Whatcom County, developers through a mitigation fee, or some other unknown source of funds, the District could not even achieve the approximate 8 minute response time that the CFP is based upon.

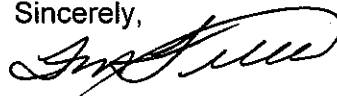
### PUBLIC PROCESS

The District engaged in an extensive public process, including SEPA review, prior to adopting its CFP. Since the Spring of 2008, at least 8 public workshops were held specifically focusing on interested groups, such as the development community, and the Birch Bay Community. In addition, the District held a public hearing in 2008, the County Planning Commission held a public hearing on the District's CFP, and the District Commission conducted two additional public hearings in July and August this past summer.

The results of those meetings, workshops and public hearings, and in response to those comments, the District did revise the CFP and the necessary mitigation schedule in advance of the final public hearing and prior to the SEPA review of the CFP that was approved.

On behalf of the District, the County Council is requested to include the District's CFP in its Comprehensive Plan, to amend the Birch Bay Community Plan accordingly and as requested to be consistent with the District's CFP, and to provide for the implementation of the CFP and the financing component thereof, including the mitigation fee schedule through the County's SEPA policies and development regulations including the County's Concurrency Ordinance. Thank you.

Sincerely,



Chief Tom Fields

Enclosures: Commission Resolution No. 2009-13, including approved Capital Facilities Plan, and District Standard of Cover; Summary of necessary changes to Birch Bay Community Plan.

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**ORIGINAL**

**WHATCOM COUNTY FIRE PROTECTION DISTRICT #21**

**Resolution 2009-13**

**A RESOLUTION OF THE BOARD OF FIRE COMMISSIONERS OF WHATCOM COUNTY FIRE PROTECTION DISTRICT NO. 21 ADOPTING A CAPITAL FACILITIES PLAN AND MITIGATION FEE SCHEDULE**

**WHEREAS**, Whatcom County Fire Protection District No. 21 (the "District") is the designated provider of fire protection, fire suppression, and emergency medical response services ("Services") within the boundaries of the District, including nearly all of the Birch Bay Urban Growth Area ("Birch Bay UGA") and the City of Blaine;

**WHEREAS**, the District is not able to provide these Services at an urban level in a manner consistent with urban levels of service as established by the Whatcom County Birch Bay Community Plan for the Birch Bay UGA or at National Fire Protection Association ("NFPA") standards;

**WHEREAS**, in a Whatcom County Council meeting on November 14, 2006, the District and Whatcom County Planning staff advised the County Council that the District lacks the financial resources and funding sources to provide and maintain urban levels of service to the Birch Bay Urban Growth Area, and that an amendment to the Birch Bay Community Plan and the County Comprehensive Plan, including Capital Facilities Plan, was necessary;

**WHEREAS**, pursuant to RCW 36.70A.470, it is the County's obligation to initiate and to amend the County Comprehensive Plan and any associated changes to the County zoning code and related maps when the County is aware of any errors or changed circumstances in the existing Comprehensive Plans and Subarea Plans, such as the inability of the District to meet the level of service set forth in the County's Birch Bay Community Plan and the inaccuracies in the Birch Bay Community Plan regarding District revenues;

**WHEREAS**, in 2007 the District, at the request of the Whatcom County Council, the Whatcom County staff, and a number of private property owners within the District, caused a District consultant to prepare a draft facilities needs assessment (the "Needs Assessment") which assessed existing capital facilities and identified needed capital facilities, including new, upgraded, improved or replacement facilities necessary to allow the District to have adequate facilities to provide, maintain and increase the level of services to the future development within the District, and to the Birch Bay UGA in particular, at levels of service consistent with NFPA standards, such as NFPA 1710 and/or NFPA 1720;

**WHEREAS**, in the spring of 2008, the District held no less than four (4) community meetings/workshops reviewing, discussing and receiving comments upon the draft capital Needs Assessment in the City of Blaine, on the East side of the District, with the Fire District community, and with the West Side of the District (Birch Bay);

**WHEREAS**, following the community meetings, and subsequent meetings with the County Planning Department, at the recommendation of the County Planning Department, the District built upon the Needs Assessment and prepared a draft Capital Facilities Plan in compliance with the requirements of the Growth Management Act (RCW 36.70A.070), utilizing the population forecasts and allocation provided by Whatcom County Planning staff and contained in Whatcom County's draft Environmental Impact Statement for the 10 year Urban Growth Area Review dated May 2009 ("draft EIS"), utilizing the "highest growth scenario" from the alternatives analyzed in the County's draft EIS;

**WHEREAS**, the District's draft Needs Assessment and draft Capital Facilities Plan were presented to Whatcom County staff, and subsequently presented to the County Planning Commission, as part of the District's proposal to the County to amend the Birch Bay Community Plan with a recommendation of adoption following the County's SEPA Official's issuance of a Determination of Non-Significance on March 20, 2009 (SEP2009-0008) with said draft Capital Facilities Plan based upon the then existing population forecasts for Whatcom County as recommended to the District by the County Planning Director;

**WHEREAS**, the Whatcom County Planning Commission conducted a public hearing in June of 2009 on the District's draft Capital Facilities Plan and proposed amendment to the Birch Bay Community Plan, but took no action, deferring action to occur in the summer and fall of 2009, or to be part of the 2010 Comprehensive Plan docket;

**WHEREAS**, following the Planning Commission public hearing, the Whatcom County Planning department staff recommended that the District revise its draft Capital Facilities Plan to be based on the projected population potentially to be allocated within the District as set forth in the County's draft EIS for the Whatcom 2031 Urban Growth Area update as part of Whatcom County's efforts to comply with the Compliance issued in a Western Washington Growth Management Hearings Board case;

**WHEREAS**, the District revised the draft Capital Facilities Plan based upon the new direction from Whatcom County Planning and engaged in further public processes by placing the new revised draft Capital Facilities Plan on its website, and again conducting numerous public forum/workshops within the District related to the revised draft Capital Facilities Plan, including a forum with District staff and the District consultant at the District's Lynden station specifically for the development community, a meeting specifically for the District's Eastside community including the Lynden and Laurel areas, a meeting specifically with City of Blaine officials, and a meeting with the District's Westside community including Blaine, Birch Bay and Custer;

**WHEREAS**, the District Commission conducted two public hearings one month apart on July 16, 2009 and on August 20, 2009, receiving only two oral comments, and three written comments;

**WHEREAS**, following these community forums and after receipt of comments at those forums, and following the first public hearing, the District staff made minor revisions and clarifications to the draft Capital Facilities Plan and re-circulated the revised draft Capital Facilities Plan for comment;

**WHEREAS**, the District Deputy SEPA responsible official reviewed the proposed Capital Facilities Plan and issued a Determination of Non-Significance on August 17, 2009 with an appeal deadline of September 4, 2009, which was not appealed;

**WHEREAS**, the Growth Management Act includes the goal to “ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards”;

**WHEREAS**, the County-wide Planning Policies include the policy related to non-city urban growth areas stating that “the County shall assure that there are plans to provide appropriate levels of urban facilities and services within non-city Urban Growth Areas. These plans should be developed by special purpose districts, water associations and private service providers within each of these Areas, and should be implemented, where appropriate, through interlocal agreements. Short term and long term boundaries may be used to facilitate provision of urban levels of service.” CPP E.4;

**WHEREAS**, the District’s capital facilities planning process would ideally result in an interlocal agreement between the County and the District to provide for the collection by the County and distribution to the District of the appropriate capital facilities mitigation fee as a condition of development approval, thus providing the capital funds necessary for the construction of facilities necessary to enable the District to provide urban levels of service to the Birch Bay UGA at County and national standards;

**WHEREAS**, presently, the District cannot meet the urban levels of service standard established by Whatcom County in the Birch Bay Community Plan or as set forth in NFPA 1720 in the Birch Bay area due to statutory revenue limitations and is, thus, dependent upon developers contributing capital facilities to the District or having Whatcom County or other third parties, such as developers, providing revenue in the form of a mitigation fee to fund the capital facilities necessary to provide an urban level of service as set forth in NFPA 1720 in the Birch Bay UGA, a slower response time level of service standard than that which is presently set forth in the Birch Bay Community Plan;

**WHEREAS**, the District has developed a revised mitigation fee schedule based upon the Capital Facilities Plan and the financing plan therein, the slower level of service standard that is set forth in NFPA 1720 instead of the faster and more demanding response level of service standard set forth in the Birch Bay Community Plan, and limited available revenue sources; and

**WHEREAS**, in order to implement the District’s Capital Facilities Plan and financial plan component of the District’s Capital Facilities Plan, additional revenue is required from Whatcom County or a third party, and the District’s revised mitigation fee schedule provides for a mitigation fee on development for future required capital facilities necessary to deliver an urban level of service, with such fee allocated on a proportional basis between new development and existing development, and based upon the principals of allocation of costs related to the impacts to capital facilities that are reasonably necessary as a direct result of the development and the need for urban levels of services, and excluding costs necessary to cure existing capital facility deficiencies.

**NOW, THEREFORE, BE IT RESOLVED BY THE COMMISSION FOR WHATCOM COUNTY FIRE DISTRICT NO. 21 TO ADOPT THE FOLLOWING:**

1. The Capital Facilities Plan as set forth in Exhibit “A” attached hereto, and to forward the same to Whatcom County for inclusion in the County Comprehensive Plan as part of Whatcom County’s 10 year Urban Growth Area update in 2009.

2. The Mitigation Fee schedule as set forth in Exhibit "B" attached hereto, and to forward the same to Whatcom County for inclusion in the County Comprehensive Plan, for implementation through the County's SEPA policies, and to request the County to include this mitigation fee in lieu of a developer's construction of facilities as a condition of development in order to provide for and ensure the adequacy of public facilities and services for new development, as well as the achievement of concurrency.


**AND TO TAKE THE FOLLOWING FURTHER ACTIONS:**

3. To again ask Whatcom County to amend and revise the Birch Bay Community Plan level of service standard for fire and emergency response and to ask Whatcom County to adopt the District's Standard of Cover as set forth in District Commission Resolution Number 2007-023 (see Exhibit "C" attached hereto) to be included in the Birch Bay Community Plan as the level of service standard within the District.

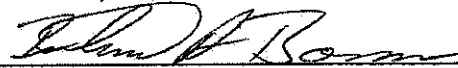
**PASSED BY THE BOARD OF FIRE COMMISSIONERS OF WHATCOM COUNTY FIRE PROTECTION DISTRICT NO. 21 ON THE 8<sup>TH</sup> DAY OF SEPTEMBER, 2009.**

  
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Chairman, Bill Salter

  
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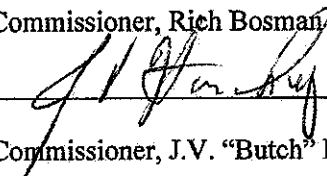
Vice-Chairman, Dean Whitney

  
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Commissioner, Rich Bosman

  
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Commissioner, Roger Hawley

  
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Commissioner, J.V. "Butch" Hinchey

  
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Chief Fields, Board Secretary

# **CAPITAL FACILITIES PLAN**

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## **NORTH WHATCOM FIRE AND RESCUE**

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**Prepared By**

Henderson,  
Young &  
Company

**Technical Assistance By**

Entrada/San Juan, Inc.

August 15, 2009

## **Introduction**

This document is the Capital Facilities Plan of North Whatcom Fire and Rescue. It contains all the elements required by Washington law for capital facilities plans that comply with Washington's Growth Management Act.

### **Capital Facilities Plan Purpose**

Capital facilities are the facilities needed to support growth. They include roads, sewers, parks and open space, and facilities for drinking water, stormwater, garbage disposal and recycling, and all the government buildings which house public services, including schools, law enforcement and fire protection. Regarding fire protection, capital facilities also includes the major apparatus needed to provide this service, such as fire engines and aid vehicles.

North Whatcom Fire and Rescue's Capital Facilities Plan is developed in conjunction with Whatcom County's "Whatcom 2031" 20 year plan which is an update of the County's comprehensive plan to be consistent with the requirements of the Growth Management Act.

The purpose of the CFP for North Whatcom Fire and Rescue is to use sound fiscal policies to provide adequate public facilities consistent with the land use element of the County's comprehensive plan and concurrent with, or prior to, the impacts of development in order to achieve and maintain the district's adopted standards for level of service.

### **Growth Management Act**

The Capital Facilities Plan (CFP) is required by the State Growth Management Act (GMA). The GMA requires the CFP to identify specific facilities, include a realistic financing plan, and make adjustment to the plan if funding is inadequate. The North Whatcom Fire and Rescue CFP will be incorporated into the Whatcom County CFP.

The GMA requirements for the CFP are set forth in RCW 36.70A.070(3), "Each comprehensive plan shall include a plan, scheme, or design for each of the following:

*"A capital facilities plan element consisting of: (a) An inventory of existing capital facilities owned by public entities, showing the locations and capacities of the capital facilities; (b) a forecast of the future needs for such capital facilities; (c) the proposed locations and capacities of expanded or new capital facilities; (d) at least a six-year plan that will finance such capital facilities within projected funding capacities and clearly identifies sources of public money for such purposes; and (e) a requirement to reassess the land use element if probable funding falls short of meeting existing needs*

*and to ensure that the land use element, capital facilities plan element, and financing plan within the capital facilities plan element are coordinated and consistent.”*

Recent Western Washington Growth Management Hearings Board cases indicate a Comprehensive Plan should have a 20-year plan for capital facilities, though only 6 years need to be fully financed.

#### **Organization of the CFP**

As required by RCW 36.70A.070 (3), North Whatcom Fire and Rescue's capital facilities plan contains the following:

- A. Fire Protection Services and Inventory:** this section provides a narrative description of the fire district operations and the current inventory of stations and apparatus.
- B. Forecast of Future Needs:** this section identifies the level of service standards and analyzes the need for capital improvements to achieve levels of service
- C. Capital Projects:** this section lists the capital improvements that will eliminate existing deficiencies, make available adequate facilities for future growth, and repair or replace obsolete or worn out facilities.
- D. Financing Plan:** this section lists the funding sources that will pay for needed capital improvements.
- E. Coordination of CFP and Land Use Plan:** this section addresses the requirement that the land use element, capital facilities plan element, and financing plan within the capital facilities plan element are coordinated and consistent.

## A. Fire Protection Services and Inventory

### Fire Protection Services

Whatcom County Fire District #21, doing business as North Whatcom Fire and Rescue (NWFR), is a rural fire protection district, established under Title 52 of the Revised Code of Washington. The district was created in 2006 through the merger of Whatcom Fire Districts No. 3 and No. 13. The fire district serves a population of 28,246 in 147 square miles of Whatcom County, Washington. The service area includes the City of Blaine, the Birch Bay area and a large portion of rural northern Whatcom County. NWFR also protects three of the busiest ports of entry along the US/Canadian border. These crossings serve all private vehicles and commercial truck traffic connecting Western Canada with the US West Coast. NWFR spans multiple state and interstate highways, major rail lines and regional power substations as well as high-pressure, regional pipelines carrying petroleum and natural gas. NWFR also protects a critical regional airport navigation facility and a Federal Communications Commission communications monitoring facility. In addition by automatic aid, NWFR supports a neighboring jurisdiction to the south in protecting the Cherry Point industrial complex. This area includes two oil refineries, an aluminum manufacturing plant and a co-generation plant as well as chemical and propane storage facilities. The City of Lynden is within the fire district boundaries but operates its own independent fire department, using NWFR for mutual aid.

The fire district operations include fire response, emergency medical services including BLS (basic life support) transport, hazardous materials response at the operations level, some limited rescue, and fire prevention and public education activities. The fire district is classified as a "combination" district incorporating both career (paid) personnel and on-call (volunteer) personnel. During 2008 the district consisted of 37 full-paid firefighters, 50 volunteer firefighters and 11 support staff. The district operates out of 10 fire stations.

## Inventory of Current Facilities

Exhibit 1 shows the current inventory of career (staffed) and volunteer fire stations for North Whatcom Fire and Rescue, including the location, size and apparatus capacity (number of bays). The department has 10 fire stations for a total of 72,422 square feet of building space.

Exhibit 1: Fire Station Inventory

Station	Location	Square Feet	Number of Bays	Acres	
<b>Career Stations</b>					
61	Blaine Station	9408 Odell Rd., Blaine	9,853	4	1.16
63	Birch Bay Station (HQ)	4581 Birch Bay Lynden Rd., Blaine	10,850	4 dbl deep w/drive thru	2.00
71	Lynden Station	307 19th St., Lynden	9,757	2 w/o drive thru	0.87
Sub Total: Career Stations			30,460		4.03
<b>Volunteer Stations</b>					
62	Semiahmoo Station	9001 Semiahmoo Pkwy, Blaine	8,600	1 (small apparatus)	0.92
64	Custer Station	7625 Custer School Rd., Custer	5,000	4 w/drive thru	0.60
65	Haynie Station	3401 Haynie Rd., Blaine	5,200	3 w/o drive thru	1.85
68	Delta Station	8188 N. Enterprise Rd., Ferndale	5,063	3 w/o drive thru	0.90
69	Laurel Station	6028 Guide Meridian, Bellingham	6,399	4 w/o drive thru	1.47
70	Wiser Lake Station	633 E. Wiser lake Rd., Lynden	5,170	4 w/ drive thru	1.00
72	Northwood Station	1707 R. Badger Rd., Lynden	6,530	5 w/o drive thru	1.65
Sub Total: Volunteer Stations			41,962		8.39
Station Total:			72,422		12.42

Source: North Whatcom Fire and Rescue

The location of the stations is shown in Exhibit 4 which also displays the population density and urban growth area boundaries in the fire district.

Exhibit 2 shows the current (2008) apparatus inventory as it was assigned to each of the ten fire stations. Apparatus are assigned to each of the stations with the exception of Station 64 at which the apparatus have been taken out of service.

Exhibit 2: Inventory of Apparatus

Station		Ambulance	Engine/ Pumper	Tender	Aerial	Brush Truck
<b>Career Stations</b>						
61	Blaine Station	2	2			
63	Birch Bay Station (HQ)	2	1	1	1	1
71	Lynden Station	1	1			
Sub Total: Career Station Apparatus		5	4	1	1	1
<b>Volunteer Stations</b>						
62	Semiahmoo Station	1	1			
64	Custer Station					
65	Haynie Station	1	1	1		
68	Delta Station	1	1	1		1
69	Laurel Station	1	1	1		1
70	Wiser Lake Station	1	1	1		
72	Northwood Station	1	1	1		1
Sub Total: Volunteer Station Apparatus		6	6	5		3
<b>Apparatus Total</b>		<b>11</b>	<b>10</b>	<b>6</b>	<b>1</b>	<b>4</b>

Source: North Whatcom Fire and Rescue

## **B. Forecast of Future Needs for Capital Improvements**

### **Level of Service Measures**

There are many ways that public agencies measure the level of service they provide. Some are quantitative measures of the ratio of public facilities to the population. Examples include 10 acres of parks per 1,000 population, or 300 gallons of water per person per day. Another approach is to measure the extent to which public facilities are used. An example from transportation is the ratio of traffic volume to the capacity of the road. If a road's volume is 8,000 vehicles per day, and that road's capacity is 10,000 vehicles per day, the ratio is 0.80.

In the field of fire and rescue protection, the most meaningful measure of service is the time it takes to provide fire and/or rescue equipment at the scene of an emergency. The National Fire Protection Association (NFPA) has established standards for responses to urban, suburban, rural, and remote areas. There are separate standards for career (full-time paid) fire departments or districts and for combination fire departments and districts (including those with volunteer only staffing).

In December 2007, North Whatcom Fire and Rescue (NWFR) adopted response time performance objectives that are based on NFPA standards, adjusted to local conditions and capabilities. The following are NWFR's performance standards (Response Time Objectives) for all Priority 1 incidents (fire and life threatening medical):

- (Tier 1) Urban – Eight (8) minutes 90% of the time for arrival of the first due fire engine company
- (Tier 2) Suburban – Ten (10) minutes 90% of the time for arrival of the first due fire engine company
- (Tier 3) Rural – Twelve (12) minutes 90% of the time for arrival of the first due fire engine company
- (Tier 4) Remote – Fourteen (14) minutes 90% of the time for arrival of the first due fire engine company

These response time objectives provide benchmark's for NWFR's ability to save lives and property. The benchmarks are indicators of the outcome of NWFR's service, but they do not directly indicate the quantity of service (i.e., the number of fire stations or apparatus (i.e., fire engines, aid vehicles, etc.).

NWFR's Capital Facilities Plan (CFP) analyzes the need for fire stations and apparatus, including capital improvements needed to achieve NWFR's level of service standards (e.g., the response time objectives). NWFR's level of service performance standards for response times do not directly measure the number of fire stations and apparatus, therefore the analysis of needs in this CFP uses several indicators of need to establish the relationship between the performance objectives and the quantity of fire stations and apparatus. The final determination of need is not the result of a formula, but is the result of the interpretation of the multiple indicators of need by fire service professionals and the NWFR Commissioners.

The analysis of need is focused on stations with full-paid firefighters because those stations are the first responder to most calls (96.5% of calls in 2008), thus they are the primary factor in determining response time and other measures of service.

#### Indicators of Need

There are many variables that should be considered when determining the need for fire stations and apparatus to achieve NWFR's level of service standards. These variables include:

- type of incident: fire or rescue (emergency medical service)
- magnitude of incident: major or lesser
- type of property: high hazard or lower hazard
- communication time from receipt of emergency call to dispatch of responder
- availability of the nearest responder: nearest unit available or nearest unit is on another call so the response is by the next nearest unit (which is farther away)
- turn out time from notification of emergency to departure to the scene
- distance from station to the scene of the emergency
- transportation network location, condition, and interruptions between the station and the scene of the emergency
- travel time from station to the scene of the emergency (directly affected by distance and transportation network plus other variables)
- responding unit(s): career and/or volunteer

There are several quantitative measures that indicate the need for fire stations and apparatus. The indicators of need used by NWFR in the following analysis include:

1. population growth
2. urban density growth
3. household growth
4. employment growth
5. emergency call (workload) growth
6. existing deficiencies of response times
7. response time trends
8. fire station coverage (areas reachable within time standards)
9. stations and apparatus needed to maintain recent ratios to existing development

Each of these indicators of need is presented below.

### **1. Population Growth**

Exhibit 3 shows Whatcom County's growth projections for population for North Whatcom Fire and Rescue through the year 2031.

Growth forecasts are shown for 4 planning alternatives. These planning alternatives represent the alternatives included in the May 2009 WHATCOM2031

Environmental Impact Statement. Briefly, the planning alternatives are as follows:

**No Action – Current Comp Plan:** this alternative assumes growth similar to the Whatcom County adopted comprehensive plan.

**No Action – Trends Alternative:** this alternative assumes that future growth will match the County's historic pattern of urban and rural growth.

**Action Alternative X:** this alternative is based on shifting future growth away from the rural areas and resource lands and into the urban growth areas (UGAs). The emphasis is on infill development in the existing UGAs and continuing the focus on Bellingham as the primary population and employment center in the County. This alternative assumes that the planned densities will be achieved through a focus on infill development.

**Action Alternative Y:** this alternative also shifts future growth away from rural areas and resource lands but not as intensely as Alternative X. This alternative also shifts growth away from Bellingham and into other small urban areas. This alternative assumes that densities will be similar to recent patterns.

North Whatcom Fire and Rescue population growth for the year 2031 for each of the four planning alternatives is shown in Exhibit 3. The rate of growth ranges from a low of 31.88% in the No Action – Current Comp Plan alternative to a high of 61.94% for Alternative Y where the shift in growth is focused on small urban areas including the UGA portions of North Whatcom Fire and Rescue.

**Exhibit 3. Population Growth: 2008 - 2031**

	No Action - Current Comp Plan	No Action - Trends	Alternative X	Alternative Y
2008	28,246	28,246	28,246	28,246
2031	37,252	39,193	40,669	45,742
Growth	9,006	10,947	12,423	17,496
% Increase	31.88%	38.76%	43.98%	61.94%

Source: Whatcom County Draft Environmental Impact Statement, Appendix D

The growth in population is likely to create a comparable increase of 31.88% to 61.94% in emergency calls to North Whatcom Fire and Rescue.

## 2. Urban Density growth

Exhibits 4 and 5 show the location of urban, suburban and rural development in North Whatcom Fire and Rescue. The definition of urban, suburban and rural is from the National Fire Protection Association's thresholds of greater than 1,000 persons per square mile for urban, 500 – 1,000 persons per square mile for suburban, and less than 500 persons per square mile for rural. These thresholds correspond to the urban/suburban/rural response time objectives in NWFR's performance standards listed above. Based on the definition of "Remote" under NFPA 1720 Standards, NWFR does not have any "Remote" area.

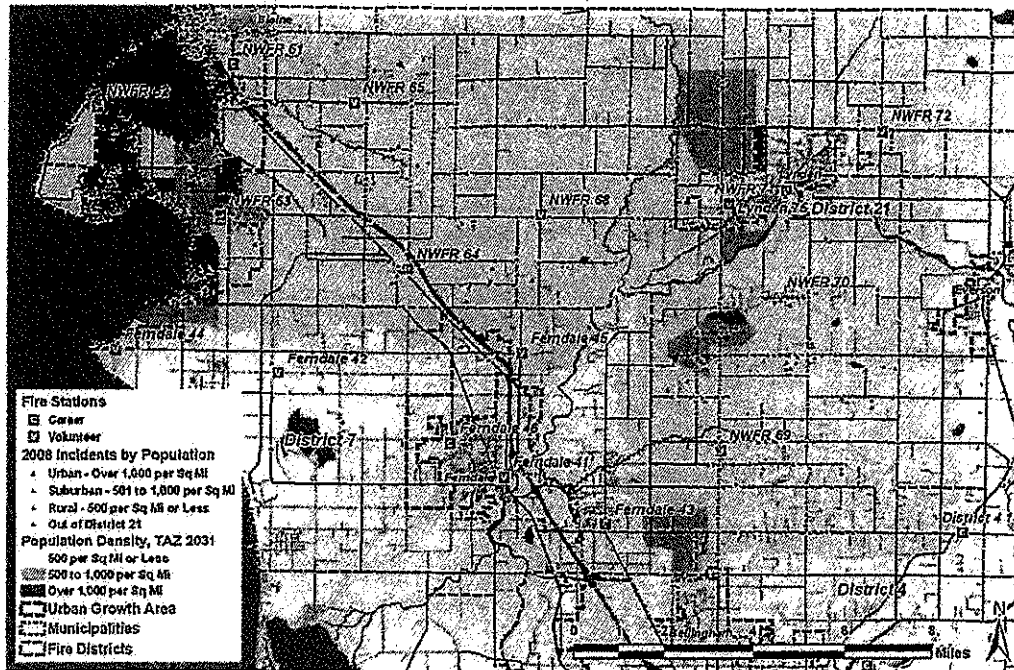
Exhibit 4 shows the current population densities in 2008, and Exhibit 5 shows the population densities in 2031 for Alternative Y of the County's growth alternatives. The Exhibits show significant increases in population density in the northwest portion of the District in and around Blaine and Birch Bay, and also in the eastern portion of the District near Lynden and south near Ferndale.

Exhibits 4 and 5 also show the boundaries of Whatcom County's Urban Growth Areas. There is a strong correlation between the urban and suburban areas identified by NFPA's criteria and the UGAs defined by Whatcom County. To the extent that there are a few differences they can be attributed to (1) the boundaries of Traffic Analysis Zones that were used by the County to allocate population, and (2) the County's UGA boundaries are based on a number of variables, but not directly based on the NFPA standards.



Exhibit 5. North Whatcom Fire and Rescue: 2031 Population Density

Whatcom County Fire District 21  
Population Density - TAZ 2005 Blocks, with 2031 Population  
2008 Incidents Coded by TAZ 2005/2008 Status



Source: Entrada/San Juan, Inc.

The growth in population density in the northwest and east-central areas of NWFR is likely to create a comparable increase in the location of emergency calls to North Whatcom Fire and Rescue.

Whatcom County's population forecast for 2031 for Alternative Y includes some suburban densities north and south of Lynden, and northeast and southeast of Ferndale. NWFR notes that the Lynden areas and the area northeast of Ferndale are within NWFR's urban response time coverage (see Exhibit 14). The suburban growth southeast of Ferndale is partly in NWFR's suburban response time coverage, and partly in NWFR's rural response time coverage. However, mutual aid from Ferndale Station 43 provides urban response times to the area.

### 3. Household Growth

North Whatcom Fire and Rescue household growth for the year 2031 for each of the four planning alternatives is shown in Exhibit 6. The rate of growth ranges from a low of 34.4% in the No Action – Current Comp Plan alternative to a high of 63.85% for Alternative Y which tracks the population growth in Exhibit 3.

**Exhibit 6. Household Growth: 2008 – 2031**

	No Action - Current Comp Plan	No Action - Trends	Alternative X	Alternative Y
2008	11,284	11,284	11,284	11,284
2031	15,166	15,682	16,535	18,489
Growth	3,882	4,398	5,251	7,205
% Increase	34.40%	38.98%	46.53%	63.85%

Source: Whatcom County Draft Environmental impact Statement, Appendix D

The growth in households is likely to create a comparable increase of 34.30% to 63.85% in emergency calls to North Whatcom Fire and Rescue.

### 4. Employment Growth

North Whatcom Fire and Rescue employment growth for the year 2031 for each of the four planning alternatives is shown in Exhibit 7. The rate of growth ranges from a low of 35.58% in the No Action – Current Comp Plan alternative to a high of 75.95% for Alternative Y as the growth focus is away from Bellingham to the smaller urban areas.

**Exhibit 7. Employment Growth: 2008 – 2031**

	No Action - Current Comp Plan	No Action - Trends	Alternative X	Alternative Y
2008	11,629	11,629	11,629	11,629
2031	15,767	18,946	17,303	20,461
Growth	4,138	7,317	5,674	8,832
% Increase	35.58%	62.92%	48.79%	75.95%

Source: Whatcom County Draft Environmental impact Statement, Appendix D

The growth in employment is likely to create a comparable increase of 35.58% to 75.95% in emergency calls to North Whatcom Fire and Rescue.

For all three needs indicators (1) population, (2) households, and (3) employment, planning Alternative Y results in approximately twice the rate of growth in the fire district compared to growth patterns allowed in the current Whatcom County Comprehensive Plan (i.e., No Action-Current Comp Plan alternative).

### 5. Emergency Call (Workload) Growth

North Whatcom Fire and Rescue has been experiencing an increase in workload as demonstrated in Exhibit 8. The 2007 and 2008 emergency fire and rescue calls (priority one incidents) are shown for each of the 10 stations. The percent of change from 2007 to 2008 is shown in the last column. In many cases the workload has either significantly increased or decreased from 2007 to 2008 due to operational changes and assignments to stations during this time frame. However, overall the workload increased by 2.6% in 2008.

**Exhibit 8. Emergency Call (Workload) Trends: Station By Station Analysis**

Station	2007 Priority One Responses	2008 Priority One Responses	2007-2008 % Increase
61	553	552	-0.2%
62	39	2	-94.9%
63	462	680	47.2%
64	101	5	-95.0%
65	37	5	-86.5%
68	111	7	-93.7%
69	173	17	-90.2%
70	103	5	-95.1%
71	228	605	165.4%
72	37	3	-91.9%
Other Stations	10	22	120.0%
<b>Total</b>	<b>1,854</b>	<b>1,903</b>	<b>2.6%</b>

Note: the "Other" Stations in Exhibit 8 are responses from out of district that dispatch assigned to North Whatcom Fire and Rescue.

Source: Entrada/San Juan, Inc.

Exhibit 9 shows the potential growth in workload by the year 2031 for the urban, suburban and rural areas of the fire district. The forecast of priority one responses for 2031 assumes that the district's workload will increase consistent with the growth in population from 2008 to 2031. The workload forecasts range from a low of 28.49% in the rural areas to a high of 173.1% in the suburban areas of the district.

**Exhibit 9. Emergency Call (Workload) Growth: Plan Alternative Y**

	2008 Priority One Responses	2008 Population	2031 Population (Alternate Y)	2031 Priority One Responses	% Increase
Urban	591	7,791	14,465	1,157	95.77%
Suburban	316	3,204	9,512	863	173.10%
Rural	923	16,437	21,496	1,186	28.49%
Total	1,830	27,432	45,473	3,206	75.19%

Source: Whatcom County Draft Environmental Impact Statement, Appendix D and Enstrada/San Juan, Inc.

The growth in workload is likely to create a comparable increase need for fire stations and apparatus.

#### 6. Existing Deficiencies of Response Times

Exhibit 10 demonstrates on a districtwide basis, the fire district is most deficient in the urban areas and is very close to meeting its standard in the rural areas of the service area. The urban area standard is 8 minutes 90% of the time. The actual response time in the urban area in 2008 averaged 11.067 minutes 90% of the time. The district achieved 8 minute response time for 65% of the calls. The deficiency between the 8 minute standard and the 11.067 minute performance is 3.067 (which is 38% deficient compared to the 8 minute standard (i.e.,  $3.067 \div 8.000 = 38\%$ ). Lesser deficiencies occurred in 2008 for suburban and rural areas.

**Exhibit 10. Response Time: Districtwide 2008 Performance vs. Standard**

	Standard (Minutes)	Standard (Percentile)	Minutes @ 90 <sup>th</sup> Percentile	Percent @ standard	Minutes Deficient	Percent Deficient (minutes deficient + std min)
Urban	8	90%	11.067	65%	3.067	38%
Suburban	10	90%	12.500	75%	2.500	25%
Rural	12	90%	13.233	83%	1.233	10%

Source: Enstrada/San Juan, Inc.

Although the district experienced deficiencies in response time performance, the trends of response time are improving, as shown in the next section.

**7. Response Time Trends**

Exhibits 11 - 13 compare response times to emergency (priority one) fire and rescue calls for the years 2007 and 2008 and how the actual response times compare to the adopted standards. The response time applies to the first engine or ambulance to arrive on the scene of the fire or EMS incident.

Exhibit 11 shows the fire district's actual performance for the past two years within the urban areas of its service area. The level of service standard for urban areas is an 8 minute or less response time for 90% of the priority one fire and EMS incidents. Exhibit 8 indicates the fire district's performance has improved from 2007 to 2008. The response time at the 90<sup>th</sup> percentile improved from 12.967 minutes to 11.067 minutes. The percent of responses that took 8 minutes or less increased from 55% to 65% of all priority one emergency calls to the urban areas.

**Exhibit 11. Response Time Trends: Districtwide Urban Performance**

	Standard (Minutes)	Standard (Percentile)	Minutes @ 90th Percentile	Percent @ standard
2007	8	90%	12.967	55%
2008	8	90%	11.067	65%

Source: Entrada/San Juan, Inc.

Exhibit 12 shows the fire district's actual performance for the past two years within the suburban areas of its service area. The level of service standard for suburban areas is a 10 minute or less response time for 90% of the priority one fire and EMS incidents. Exhibit 11 indicates the fire district's performance has improved from 2007 to 2008. The response time at the 90<sup>th</sup> percentile improved from 13.550 minutes to 12.500 minutes. The percent of responses that took 10 minutes or less increased from 70% to 75% of all priority one emergency calls to the suburban areas.

**Exhibit 12. Response Time Trends: Districtwide Suburban Performance**

	Standard (Minutes)	Standard (Percentile)	Minutes @ 90th Percentile	Percent @ 10 minutes
2007	10	90%	13.550	70%
2008	10	90%	12.500	75%

Source: Entrada/San Juan, Inc.

And finally, Exhibit 13 shows the fire district's actual performance for the past two years within the rural areas of its service area. The level of service standard for rural areas is a 12 minute or less response time for 90% of the priority one fire and EMS incidents. Exhibit 12 indicates the fire district's performance has improved from 2007 to 2008. The response time at the 90<sup>th</sup> percentile improved from 13.733 minutes to 13.233 minutes. The percent of responses that took 12 minutes or less increased from 80% to 83% of all priority one emergency calls to the rural areas.

**Exhibit 13. Response Time Trends: Districtwide Rural Performance**

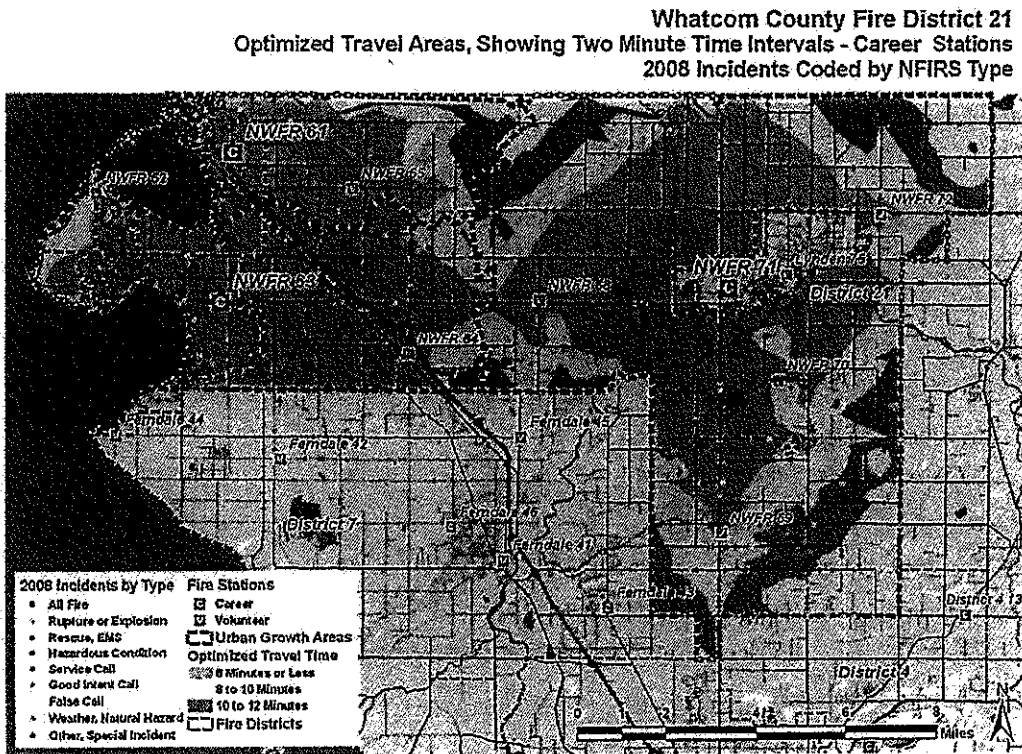
	Standard (Minutes)	Standard (Percentile)	Minutes @ 90th Percentile	Percent @ 12 minutes
2007	12	90%	13.733	80%
2008	12	90%	13.233	83%

Source: Entrada/San Juan, Inc.

## 8. Fire Station Coverage (areas reachable within time standards)

Exhibit 14 shows that the Urban Growth Area is within the coverage areas corresponding to the response time objectives for the three stations with full paid firefighters.

Exhibit 14. Urban/Suburban (8/10 Minute) Career Stations Coverage In UGA



Source: Entrada/San Juan Inc.

**9. Stations and Apparatus Needed to Maintain Recent Ratios to Existing Development**

Other indicators of the need for fire stations and apparatus to serve growth are the ratios of fire stations and apparatus to the workload of those stations and apparatus (and thus indirectly to the response times achieved by those stations and apparatus). The response times achieved in 2008 are presented above. The ratios of 2008 incidents to various units of land use is shown below in the column "Fire Incidents per Unit." Exhibit 15 also includes the growth in dwelling units and non-residential properties<sup>1</sup>, and multiplies the growth times the ratios of emergency calls per unit of development. The result is the forecast number of fire incidents and EMS incidents in the year 2031. The last 3 columns multiply the projected number of incidents times the capacity of stations and apparatus per incident in order to forecast the number of square feet of fire stations and the number of fire engines and aid vehicles that would be needed to serve growth.

<sup>1</sup> The growth in non-residential properties was estimated by multiplying the County's forecast of employment growth times established guidelines for square feet per employee from the *Planner's Estimating Guide*.

Type of Use	Employee Growth	Sq. Ft. per Employee	Building Growth Sq Ft
Retail	1,166	670	781,220
Commercial	2,305	350	806,750
Industrial	5,361	500	2,680,500

Exhibit 15 indicates a need for 16,654 square feet of additional fire stations, almost 2 fire engines and more than 2 aid vehicles to serve growth by the year 2031.

**Exhibit 15. 2031 Forecast of Stations and Apparatus to Maintain 2008 Actual Service Level**

<b>FIRE</b>							
Land Use	Growth 2008-2031	Units of Growth	Fire Incidents per Unit	Fire Incidents	Fire Station @ Sq Ft per Fire Incident	Engine @ # of Incidents per Apparatus	Aid @ # of Incidents per Apparatus
Single Family	5,901	dwelling	0.01946	114.8	14.02	300	328
Multi Family	1,304	dwelling	0.03333	43.5	1,610	0.38	0.35
Retail	781,220	sq. ft.	0.00005	39.1	609	0.14	0.13
Commercial	806,750	sq. ft.	0.000147	118.6	548	0.13	0.12
Industrial	2,680,500	sq. ft.	0.00002	61.4	1,663	0.40	0.36
<b>Total Units Needed</b>				<b>377.3</b>	<b>5,290</b>	<b>0.66</b>	<b>0.60</b>
<b>Response per unit</b>						<b>55.98%</b>	<b>28.08%</b>
<b>Net Units Needed</b>						<b>0.37</b>	<b>0.17</b>
<b>EMS</b>							
Land Use	Growth 2008-2031	Units of Growth	EMS Incidents per Unit	EMS Incidents	Fire Station @ Sq Ft per Fire Incident	Engine @ # of Incidents per Apparatus	Aid @ # of Incidents per Apparatus
Single Family	5,901	dwelling	0.08712	514.1	14.02	300	328
Multi Family	1,304	dwelling	0.11824	154.2	7,208	1.71	1.57
Retail	781,220	sq. ft.	0.00009	70.3	2,162	0.51	0.47
Commercial	806,750	sq. ft.	0.00003	22.3	986	0.23	0.21
Industrial	2,680,500	sq. ft.	0.00002	49.6	313	0.07	0.33
<b>Total Units Needed</b>				<b>810.5</b>	<b>11,364</b>	<b>2.70</b>	<b>2.74</b>
<b>Response per unit</b>						<b>55.36%</b>	<b>76.55%</b>
<b>Net Units Needed</b>						<b>1.50</b>	<b>2.09</b>
<b>Total Fire + EMS</b>				<b>1,187.8</b>	<b>16,654</b>	<b>1.86</b>	<b>2.26</b>

Source: Henderson, Young & Company using data from the Whatcom County Draft Environmental Impact Statement; "Planners Estimating Guide" by Arthur C. Nelson, Planners Press, 2004; and North Whatcom Fire and Rescue Draft Concurrency Mitigation Fee Program, December 31, 2008

## **10. Non-Capital Strategies for Improving Response Time Performance**

Response time performance can be improved by adding fire stations, engines and aid vehicles, but some improvements in response time can be obtained using non-capital strategies. NWFR is pursuing several non-capital strategies, including:

1. NWFR has entered into an automatic first response agreement with Whatcom County Fire District 7 located directly south of NWFR. This agreement enables both fire districts to improve response times in areas of marginal coverage, and provides additional staffing to both agencies during critical Priority 1 incidents.
2. NWFR is also working with the City of Lynden Fire Department on a similar agreement, where the fire district assists the city during "high workload" situations. Conversely, the City of Lynden Fire Department will provide assistance to NWFR as needed.
3. NWFR has implemented a firefighter "Intern Program" partnering with Skagit Community College to place intern firefighters in one station and assigning them a supervisor. These students now respond as part of the overall response plan thus improving staffing and response times without any significant increases in operational costs.
4. NWFR will be implementing a "three-tiered" employee/member program where some members will serve in a capacity as part paid firefighters. This part paid program will augment full paid personnel at a significant cost savings.
5. NWFR has implemented a Geo-Spatial Information System (GIS), a mapping system that assists with resource allocation planning and implementation throughout the fire district. The program examines operational statistics and provides operational information that enables the fire district to more strategically plan for fire station locations, staffing compliments based on work load, and improved response times.
6. NWFR has implemented a sophisticated financial management program that includes a financial forecasting model. The fire district has a six year financial plan. Such financial planning provides accurate revenue and expenditure projections enabling the fire district to plan for additional staffing and other operational needs.

7. NWFR monitors proposed road system projects and collaborates with the County and cities to ensure that road projects maintain or improve response times.
8. NWFR continues to develop strategies to improve response times:
  - a. Reaction times need to be ninety-seconds or less. Working towards that goal, the fire district has completed an analysis of each fire station looking at improving the ergonomics and how improvements to apparatus location, sleeping quarters and fire station work flows can make it easier for the firefighter to be out of the station within the ninety-second time frame.
  - b. Mobile data computers have been installed in all first out apparatus and all command units which provide important incident information and resource availability, thus reducing the duplication of apparatus assignment enabling better resource management.
  - c. The implementation of an automated "call back" system enables NWFR to request "off duty" personnel to return to work when large incidents or significant incident numbers warrant additional staffing.

#### **11. Analysis of Indicators of Need and Conclusions Regarding Needed Capital Improvements**

Exhibit 10 indicates that North Whatcom Fire and Rescue did not achieve its response time performance standards in 2008, but Exhibits 11, 12, and 13 indicate significant improvements from 2007 to 2008 without the addition of stations or apparatus even though emergency calls increased 2.5% during the same time period. The district is pursuing several strategies that are likely to improve its performance levels to achieve its standards for existing development without additional fire stations or apparatus. The success of those strategies should eliminate any existing deficiencies. However, the strategies will not be sufficient to sustain performance levels for growth, thus an analysis of growth is the basis for determining needed capital improvements for growth.

Exhibit 16 uses the growth percentages of population, households, employment and workload (from Exhibits 1, 4, 5, and 6) to forecast the need for additional fire station square footage and additional engines and aid vehicles. The last row of data shows the needs to provide the 2008 level of service for future growth.

The data indicates that North Whatcom Fire and Rescue needs additional fire station space, engines and aid vehicles to serve growth between 2008 and 2031. Generalizing from the data, it appears that the district needs approximately 20,000 square feet (the equivalent of 2 fire stations), plus 2 engines and 2 aid vehicles (one of each at each new station).

**Exhibit 16. Analysis of Indicators of Need**

Indicator of Need	Growth 2008 - 2031	Additional Station square feet (full paid)	Additional Engines (full paid)	Additional Aid Vehicles (full paid)
Current Inventory		30,460	4.0	4.0
		2009 inventory (above) x growth % (left) = amount needed		
Population growth	61.94%	18,867	2.5	2.5
Household growth	63.85%	19,449	2.6	2.6
Employment growth	75.95%	23,134	3.0	3.0
Workload growth	65.76%	20,030	2.6	2.6
Maintain 2008 LOS	units, not %	16,654	1.9	2.3

Source: Henderson, Young & Company (from Exhibits 3, 6, 7, 9, and 15)

The population density maps for 2008 and 2031 in Exhibits 4 and 5 show the largest portion of the growth occurring in the northwest portion of the District in and around Blaine and Birch Bay. Exhibits 4 and 5 also show growth at suburban densities in the eastern portion of the District near Lynden and south near Ferndale.

The northwest area is the priority area for a new station, engine and aid vehicle. A second station (or expansion of an existing station) could also serve the northwest area, or it could be located to serve the northwest and Lynden. The suburban growth near Ferndale can be served by mutual aid from Ferndale Station 43.

## C. Capital Projects

### Capital Improvements Needed for Levels of Service

The analysis in the forecast of needs (above) indicates that North Whatcom Fire and Rescue needs approximately 20,000 square feet (the equivalent of 2 fire stations), plus 2 engines and 2 aid vehicles (one of each at each new station) to serve growth between 2008 and 2031.

Exhibit 17 itemizes the cost of a new fire station with one engine and one aid vehicle. All costs are presented in 2007 dollars, no inflation is included.

#### Exhibit 17. Cost of New Fire Station with Engine and Aid Vehicle

##### Land and Construction Costs

Land (2 acres).	\$ 175,000
New Construction @ \$275 sq. ft.	2,574,000
Site Development @ \$6 sq. ft.	653,400
	<hr/>
<b>Subtotal Land and Construction Cost</b>	<b>3,402,400</b>

##### Project Soft Costs

Furnishings and Equipment @ 7%	225,918
WSST @ 8.4%	271,102
A/E Fees @ 10%	322,740
Construction Management @ 6%	193,644
Specialty Consultants @ 5%	161,370
Permits/Fees/Inspections @ 2%	64,548
Printing/Reimbursables @ 1%	32,274
Contingency @ 15%	484,110
	<hr/>

**Subtotal Soft Costs** 1,755,706

##### Apparatus

Engine	425,000
Aid Vehicle	140,000
	<hr/>

**Subtotal Apparatus Cost** 565,000

**Total Project Cost (2007 Dollars)** 

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**\$5,723,106**

Source: Construction cost and apparatus from North Whatcom Fire and Rescue "Facilities and Capital Needs Assessment", ESCI, March, 2008; Land cost from local real estate estimates.

Exhibit 18 lists the cost of the two new fire stations (each with one engine and one aid vehicle) needed to serve growth as presented in the Forecast of Future Needs section of this CFP.

**Exhibit 18. Capital Improvement Projects to Serve Growth**

<u>Project</u>	<u>Cost</u>
New station A with engine and aid vehicle	\$5,723,106
New station B with engine and aid vehicle	<u>5,723,106</u>
Total Cost	\$11,446,212

Source: Henderson, Young & Company (from Exhibit 17)

The location of the new stations will be in urban growth areas. As noted in the forecast of needs, above, the northwest area of the district is the priority area for the first new station, engine and aid vehicle. A second station (or expansion of an existing station) could also serve the northwest area, or it could be located to serve the northwest and Lynden. Specific locations will be determined by the district after determining the availability of appropriately located parcels.

**Capital Improvements Needed for Asset Preservation**

In March 2008, North Whatcom Fire and Rescue received "Facilities and Capital Needs Assessment" that included a detailed analysis of the existing condition of the district's 10 fire stations, recommended improvement projects that would restore and preserve those assets, and estimates of costs for the capital projects. Exhibit 19 includes all of those projects, and four additional projects that have been identified by district command staff (Station 62 seismic upgrade, Station 63 exhaust system, Station 69 site paving overlay, and Station 71 exhaust system).

**Exhibit 19. Capital Improvement Projects to Preserve Assets**

Station	Project	Cost (per architect)	Soft Costs @ 25% (per ESCi)	Total Cost
61	no project			
62	seismic upgrade	\$301,000	\$75,250	\$376,250
63	seismic upgrade	272,020	68,005	340,025
63	exhaust system	112,000	28,000	140,000
64	exterior skin replacement	94,000	23,500	117,500
64	reroof	70,000	17,500	87,500
64	seismic upgrade	175,000	43,750	218,750
65	seismic upgrade	182,000	45,500	227,500
65	exterior skin replacement	97,500	24,375	121,875
68	seismic upgrade	179,095	44,774	223,869
68	site paving overlay	78,000	19,500	97,500
69	seismic upgrade	223,965	55,991	279,956
69	site paving overlay	101,000	25,250	126,250
70	seismic upgrade	180,950	45,238	226,188
71	seismic upgrade	341,495	85,374	426,869
71	exhaust system	56,000	14,000	70,000
72	seismic upgrade	228,550	57,138	285,688
		<u>2,692,575</u>	<u>673,144</u>	<u>3,365,719</u>

Source: North Whatcom Fire and Rescue "Facilities and Capital Needs Assessment", ESCi, March, 2008 and District Command Staff

The location of these asset preservation projects is at the fire stations indicated in Exhibit 19. The specific station locations are included in Exhibit 1. A map of the location of all stations is in Exhibit 4.

## D. Financing Plan

### Capital Projects Funding

North Whatcom Fire and Rescue's annual budget is used primarily for operating and maintenance costs, and for debt service payments. The budget does not include enough revenue to fund the capital projects identified in this Capital Facilities Plan.

The capital projects are in two categories: (1) needed for growth, and (2) preservation of existing assets. The projects needed for growth can be funded by mitigations from new development. The district has developed a Concurrency Mitigation Fee Program that uses local emergency call data to determine the impact

of different types of land uses on the fire stations and apparatus of North Whatcom Fire and Rescue. Exhibit 20 uses Whatcom County's Alternative Y growth forecasts (because it has the greatest impact on North Whatcom Fire and Rescue). The growth is multiplied times the mitigation fee per unit to forecast \$23.9 million of potential mitigation fee revenue from development that would occur under Whatcom County's Alternative Y growth forecasts. If the mitigation fee rates were reduced to be 47.8851% of the original calculations, the resulting revenue from the concurrency mitigation fee program would equal the estimated \$11.4 million cost of the two new stations and apparatus . This is sufficient revenue to fund the capital projects needed to serve growth, but this revenue is available to the District only if Whatcom County implements the district's Concurrency Mitigation Fee Program and it is accepted by the development community. The Concurrency Mitigation Fee Program is the only source of revenue to pay for capital needs to serve urban growth at urban levels because of state law limitations on district levy rates and impact fees.

**Exhibit 20. Concurrency Mitigation Fee Revenue from Growth**

Land Use	Growth 2008-2031	Units of Growth	Mitigation Fee per Unit	Mitigation Fee Revenue
Single Family	5,901	dwelling	2,078.45	\$ 12,264,933.45
Multi Family	1,304	dwelling	2,983.70	3,890,744.80
Retail	781,220	sq. ft.	2.95	2,304,599.00
Commercial	806,750	sq. ft.	3.79	3,057,582.50
Industrial	2,680,500	sq. ft.	0.89	2,385,645.00
Total				23,903,504.75
Adjustment				47.8851%
Probable Revenue				11,446,217.15

Source: Henderson, Young & Company using data from the Whatcom County Draft Environmental Impact Statement; "Planners Estimating Guide" by Arther C. Nelson, Planners Press, 2004; and North Whatcom Fire and Rescue Draft Concurrency Mitigation Fee Program, December 31, 2008

Funding of the asset preservation projects can be accomplished by issuing a bond in the amount of approximately \$3.4 million. Alternatively, the district could use current revenues for a slower "pay as you go" method of paying for asset preservation projects.

### **Operating Cost Implications of Capital Costs**

Building and equipping a full paid fire station is expensive, but it is just the beginning of costs to be incurred by NWFR. It cost approximately \$1.1 million per year for the salaries, benefits, training, supplies for 3.5 lieutenants and 8.5 firefighters, plus equipment and vehicle maintenance for a new station, engine, aid vehicle.

However, new development that causes the need for new stations and apparatus will pay property taxes that the district uses for operating and maintenance expenses. The amount of growth forecast in Whatcom County's Alternative Y is estimated to add \$94 million to the tax base each year, and this amount accumulates (i.e., \$94 million in 2010, \$188 million in 2011, \$282 million in 2012, etc.). A cash flow analysis of the property taxes to be paid by this growth produces an addition \$122,000 in 2010, \$245,000 in 2011, \$368,000 in 2012, etc.). This additional revenue reaches \$1.1 million in 2018, at which time NWFR could operate the first additional station. If the district saved the growth revenue from earlier years, it could afford to open the first station as early as 2014. Similarly, the additional property taxes from growth reach \$2.2 million in 2027, at which time the second station could be operated. And if the district saved the growth revenue from earlier years, the second station could be opened as early as 2023.

A detailed analysis of the cash flow of the additional property tax from growth and the additional operating cost of new fire stations beginning in 2014 and 2023 indicates that the full operating cost of the stations for growth are paid by the property taxes from growth with neither surplus or deficit.

### **Financial Feasibility of Capital Facilities Plan**

The probable sources of revenue described above indicate that it is financially feasible to build and operate 2 new stations (with engines and aid vehicles) during the period 2008-2031 if Whatcom County implements the district's Concurrency Mitigation Fee Program. If Whatcom County does not implement the Concurrency Mitigation Fee Program it would not be financially feasible for the district to pay for capital needs to build and operate 2 new stations (with engines and aid vehicles) during the period 2008-2031 necessary to serve urban growth in the Birch Bay UGA.

## **E. Coordination of CFP and Land Use Plan**

RCW 36.70A.070 (3) (e) requires capital facilities plans to include a requirement to reassess the land use element if probable funding is inadequate to finance needed capital facilities. This requirement applies to Whatcom County because it is responsible for the land use element, and it develops the land use alternatives and population forecasts that support those alternatives. However, North Whatcom Fire and Rescue acknowledges the need for its capital facilities plan to be financially feasible in order to serve current population and forecasted growth. In the event that probable funding is inadequate to finance needed capital facilities the district cannot directly reassess the land use element, but it can employ the following strategies to make the capital facilities plan financially feasible: make adjustments to the level of service, the sources of revenue, or a combination, to achieve a balance between available revenue and needed capital facilities. This policy constitutes North Whatcom Fire and Rescue's response to the requirement of RCW 36.70A.070 (3) (e).

**WHATCOM COUNTY FIRE PROTECTION DISTRICT #21**

**Resolution 2007-23**

**A RESOLUTION OF THE BOARD OF FIRE COMMISSIONERS FOR WHATCOM COUNTY FIRE PROTECTION DISTRICT #21 DECLARING THE ESTABLISHMENT OF THE FIRE DISTRICT, LISTING THE SERVICES PROVIDED BY THE FIRE DISTRICT, DEFINING THE ORGANIZATIONAL STRUCTURE OF THE FIRE DISTRICT, DEFINING THE NUMBER OF EMPLOYEES/MEMBERS, AND ADOPTING RESPONSE PERFORMANCE STANDARDS FOR EMERGENCY SERVICES.**

**WHEREAS**, Whatcom County Fire Protection District #21 was authorized by the electorate in the year 2006 -- doing business as North Whatcom Fire and Rescue (NWFR) -- and therefore the Board of Fire Commissioners declare it as being heretofore "established"; and

**WHEREAS**, the Washington State Legislature adopted House Bill 1756 during 2005, and such bill is codified as Chapter 52.33 of the Revised Code of Washington; and

**WHEREAS**, such statute provides that each substantially career fire department be declared established; that the services provided by the district or department be listed; and among other requirements, that response performance standards for service be adopted; and

**WHEREAS**, such statute also requires that an annual report be prepared describing compliance with the local standards and otherwise reporting to the public; and

**WHEREAS**, the purpose and intent of this resolution is to establish response performance goals/objectives; and

**WHEREAS**, the response performance goals/objectives are measured by the successful reduction of response times by NWFR response forces, and the District's progress towards achieving the objectives 90% of the time; and

**WHEREAS**, the purpose and intent of this resolution is to provide goals, policies and standards so as to comply with the intent of the new legislation;

**NOW THEREFORE BE IT HEREBY RESOLVED AS FOLLOWS:**

**SECTION 1** - Since NWFR was officially authorized and formed in 2006 and thereafter a substantially career fire department has been developed, the Board of Fire Commissioners officially declares the Fire Protection District to be established.

**SECTION 2** - The services provided by NWFR, in accordance with the mission and statutes that govern fire protection districts and fire departments, are as follows:

1. Fire Suppression
2. Emergency Medical Services (EMS), Basic Life Support (BLS)
3. Emergency Medical Services (EMS), Advanced Life Support (ALS) via contract with Whatcom County EMS
4. Hazardous Materials "Operations" level response
5. Technical Rescue/Special "Operations" level response
6. Fire Prevention/Public Education
7. Participation in Local Emergency Management

**SECTION 3** - The organizational structure of NWFR is best understood by reference to the organizational chart for the District, which is hereby officially adopted by the Board, and incorporated herein by reference. However, overall direction and public policy is generally provided by the elected governing body, the Board of Fire Commissioners, whose policies are implemented on a day-to-day basis by the appointed Fire Chief/District Secretary. Various fire service officers, firefighters, Emergency Medical Technicians (EMTs), volunteer members, and other staff members complete the NWFR work force and accomplish the delivery of vital services to the public. The organizational chart, or chain-of-command, is provided as Attachment A to this Resolution.

**SECTION 4** - On the effective date of this Resolution, NWFR employs the equivalent of forty-five (45) full time employees (FTEs) and enjoys the benefit of sixty-three (63) volunteer members. The totals are divided as follows:

- Chief Officers – 3
- Career Firefighters – 37
- Volunteer Firefighters – 63
- Administrative Support – 3
- Mechanics – 1
- Pub Ed Staff – 0
- Fire Prevention Staff – 1
- Volunteer Chaplains – 0

Any changes or projected changes in these numbers will be addressed in the 2008 annual report. These employees and volunteers together are responsible for the delivery of services and functions described in Section 2 above.

**SECTION 5** - NWFR hereby establishes the following response performance goals/standards, including specific response time objectives, as applicable:

A. Response Turnout Time:

NWFR has adopted a *response turnout time objective* of ninety (90) seconds 90% of the time for all Priority 1 emergency incidents.

B. Response Objectives for Priority 1 Fire Suppression Incidents:

B.1 NWFR has adopted a response time objective of:

- Eight (8) minutes 90% of the time for the arrival of the *'first due fire engine company'* when responding to a Priority 1 fire suppression incident in the Tier I Maximum Risk Response Zone.
- Ten (10) minutes 90% of the time for the arrival of the *'first due fire engine company'* when responding to a Priority 1 fire suppression incident in the Tier II High Risk Response Zone.
- Twelve (12) minutes 90% of the time for the arrival of the *'first due fire engine company'* when responding to a Priority 1 fire suppression incident in the Tier III Moderate Risk Response Zone.
- Fourteen (14) minutes 90% of the time for the arrival of the *'first due fire engine company'* when responding to a Priority 1 fire suppression incident in the Tier IV Low Risk Response Zone

NWFR's definition of a *'first due fire engine company'* includes four (4) suppression personnel arriving on one (1) or more apparatus.

NWFR defines Tier I as Urban, Tier II as Suburban, Tier III as Rural and Tier IV as Remote per NFPA 1720.

B.2 NWFR has adopted a response/travel time objective/goal of fifteen (15) minutes for the arrival of the full first alarm assignment of response resources 90% of the time when responding to a Priority 1 fire suppression incident (where a full first alarm is required).

NWFR's full first alarm assignment includes a minimum of eleven (11) suppression personnel and one (1) Incident Commander; for a total of twelve (12) personnel.

C. Response Objectives for Priority 1 Emergency Medical Services Incidents

C.1 NWFR hereby establishes the following response performance goals/standards, including specific response time objectives, as applicable:

- NWFR has adopted a response/travel time objective of eight (8) minutes 90% of the time for the arrival of Basic Life Support (BLS) or higher level when responding to a Priority 1 incident in the Tier I Maximum Risk Response Zone.

NWFR has adopted a response/travel time objective of twelve (12) minutes 90% of the time for the arrival of Advanced Life Support (ALS) to a Priority 1 incident in the Tier I Maximum Risk Response Zone.

- NWFR has adopted a response/travel time objective of ten (10) minutes 90% of the time for the arrival of Basic Life Support (BLS) or higher level when responding to a Priority 1 incident in the Tier II High Risk Response Zone.

NWFR has adopted a response/travel time objective of twelve (12) minutes 90% of the time for the arrival of Advanced Life Support (ALS) to a Priority 1 incident in the Tier II High Risk Response Zone.

- NWFR has adopted a response/travel time objective of twelve (12) minutes 90% of the time for the arrival of Basic Life Support (BLS) or higher level when responding to a Priority 1 incident in the Tier III Moderate Risk Response Zone.

NWFR has adopted a response/travel time objective of fourteen (14) minutes 90% of the time for the arrival of Advanced Life Support (ALS) to a Priority 1 incident in the Tier III Moderate Risk Response Zone.

- NWFR has adopted a response/travel time objective of fourteen (14) minutes 90% of the time for the arrival of Basic Life Support (BLS) or higher level when responding to a Priority 1 incident in the Tier IV Low Risk Response Zone.

NWFR has adopted a response/travel time objective of sixteen (16) minutes 90% of the time for the arrival of Advanced Life Support (ALS) to a Priority 1 incident in the Tier IV Low Risk Response Zone.

NWFR defines Tier I as Urban, Tier II as Suburban, Tier III as Rural and Tier IV as Remote per NFPA 1720.

#### D. Response Objectives for Priority 1 Hazardous Materials Incidents

D.1 The Washington State Patrol is responsible for hazardous materials incidents and hazardous materials incident command within the District. NWFR response personnel are trained to the "Operations" level and support the Washington State Patrol.

D.2 Hazards Materials "Technician" level response services are provided to NWFR by Whatcom County Special Emergency Response Program (SERP).

D.3 NWFR's response time objective for an "Operations" level response to Priority 1 hazardous materials incidents is as follows.

- Eight (8) minutes 90% of the time for the arrival of the '*first due fire engine company*' when responding to a Priority 1 hazardous materials incident in the Tier I Maximum Risk Response Zone.

- Ten (10) minutes 90% of the time for the arrival of the '*first due fire engine company*' when responding to a Priority 1 hazardous materials incident in the Tier II High Risk Response Zone.
- Twelve (12) minutes 90% of the time for the arrival of the '*first due fire engine company*' when responding to a Priority 1 hazardous materials incident in the Tier III Moderate Risk Response Zone.
- Fourteen (14) minutes 90% of the time for the arrival of the '*first due fire engine company*' when responding to a Priority 1 hazardous materials incident in the Tier IV Low Risk Response Zone.

NWFR's definition of a '*first due fire engine company*' includes four (4) suppression personnel arriving on one (1) or more apparatus.

NWFR defines Tier I as Urban, Tier II as Suburban, Tier III as Rural and Tier IV as Remote per NFPA 1720.

- D.4 NWFR's response time objective for a "Technician" level response is two (2) hours to a Priority 1 hazardous materials incident.

E. Response Objectives for Priority 1 Technical Rescue Incidents

- E.1 NWFR response personnel are trained to the "Operations" level for technical rescue operations.

- E.2 Technical Rescue "Technician" level response services are provided to NWFR by the City of Bellingham Fire Department.

- E.3 NWFR response time objective for an "Operations" level response to Priority 1 technical rescue incidents is as follows.

- Eight (8) minutes 90% of the time for the arrival of the '*first due fire engine company*' when responding to a Priority 1 technical rescue incident in the Tier I Maximum Risk Response Zone.
- Ten (10) minutes 90% of the time for the arrival of the '*first due fire engine company*' when responding to a Priority 1 technical rescue incident in the Tier II High Risk Response Zone.
- Twelve (12) minutes 90% of the time for the arrival of the '*first due fire engine company*' when responding to a Priority 1 technical rescue incident in the Tier III Moderate Risk Response Zone.
- Fourteen (14) minutes 90% of the time for the arrival of the '*first due fire engine company*' when responding to a Priority 1 technical rescue incident in the Tier IV Low Risk Response Zone.

NWFR's definition of a '*first due fire engine company*' includes four (4) suppression personnel arriving on one (1) or more apparatus.

NWFR defines Tier I as Urban, Tier II as Suburban, Tier III as Rural and Tier IV as Remote per NFPA 1720.

E.4 NWFR's response time objective for a "Technician" level response is one (1) hour to a Priority 1 technical rescue incident.

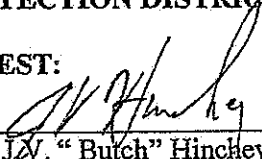
**SECTION 6** - The foregoing response performance objectives will be measured by the successful reduction of response times and the District's progress towards achieving the objectives 90% of the time. Annually, commencing in 2008, NWFR shall evaluate its levels of service, deployment, and the achievement of each response time objective throughout the District. The annual report shall define any geographic areas and circumstances in which the objectives are not being met. The annual report shall explain the predictable consequences of any deficiencies and address the steps that are necessary to achieve the objectives.

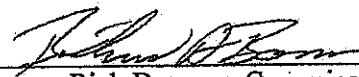
**SECTION 7** - All terms used herein, such as "turnout time," "response time," "advanced life support (ALS)" and "fire suppression," shall be defined as defined in the state statute.

**NOW THEREFORE BE IT RESOLVED**, that the Board of Fire Commissioners hereby declares the establishment of the fire district, lists the services provided by the fire district, defines the organizational structure of the fire district, defines the number of employee/members, and adopts response performance standards for emergency services.

**PASSED AND APPROVED THIS 13th DAY OF DECEMBER OF 2007 BY THE BOARD OF FIRE COMMISSIONERS OF WHATCOM COUNTY FIRE PROTECTION DISTRICT #21.**

ATTEST:

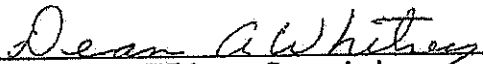
  
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J.V. "Butch" Hinckley, Chairman


  
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Rich Bosman, Commissioner

  
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Roger Hawley, Commissioner

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Eddie Lathers, Commissioner

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Bill Salter, Commissioner

  
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Dean Whitney, Commissioner

  
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Chief Fields, Board Secretary

**Adjusted Table 41: Concurrency Mitigation Fee By Land Use**

Land Use	Dec. 31, 2008 Concurrency Mitigation Fee per Unit of Development	Unit of Development	Adjusted Concurrency Mitigation Fee per Unit of Development
			47.8851%
<u>Residential</u>			
Single Family and Duplex	\$2,078.45	per dwelling unit	\$995.27
Multi-Family	\$2,983.70	per dwelling unit	\$1,428.75
<u>Non-Residential</u>			
Hotel/Motel/Resort	\$7.68	per square foot	\$3.68
Medical			
Nursing Home	\$28.67	per square foot	\$13.73
Medical-Dental	\$12.41	per square foot	\$5.94
Commercial			
Office	\$3.79	per square foot	\$1.81
Retail	\$2.95	per square foot	\$1.41
Leisure Facilities	\$1.66	per square foot	\$0.79
Restaurant/Lounge	\$3.75	per square foot	\$1.80
Industrial/Manufacturing	\$0.89	per square foot	\$0.43
Institutions			
Churches/Non-Profit	\$1.21	per square foot	\$0.58
Education	\$2.07	per square foot	\$0.99
Special Public Facilities	\$4.23	per square foot	\$2.03
Agricultural: All			
Open Space, Forest, Water: All			

## WCFD#21 – SUMMARY OF REQUEST TO AMEND BIRCH BAY COMMUNITY PLAN

Proposed deletions to the Birch Bay Community Plan language will be illustrated by text while proposed additions will be illustrated by underlined text.

1. The following alterations to Chapter 15 of the Birch Bay Community Plan, PUBLIC HEALTH AND SAFETY are proposed:
  - A. The present Birch Bay Community Plan is inaccurate and out of date. Most importantly, the Fire District is not capable of providing an urban level of service of fire protection or emergency medical response to the Birch Bay Urban Growth Area as those standards are established by Whatcom County or as established by national standards, without outside revenue from Whatcom County, as a mitigation fee from developers, or some other unknown source of funds. Accordingly, until Whatcom County updates and revises its Comprehensive Plan, the Birch Bay Urban Growth Area boundaries, or until urban levels of fire protection and emergency medical services are present to serve the Birch Bay Urban Growth Area for the foreseeable future as indicated by a Capital Facilities Plan approved and adopted by both Whatcom County and Whatcom County Fire District No. 21 (the "District"), no applications for new urban developments, including subdivisions, commercial developments, or industrial developments, should be accepted or approved.
  - B. Revise and correct all discussions related to the former "Consolidated Fire District Number 13" as follows:
    - i. Change all references to the District from District No. 13 to North Whatcom Fire and Rescue, or Whatcom County Fire protection District No. 21.
    - ii. Correct and revise the section "Consolidated Fire District Number 13- Standards."
      1. The District does not respond between 5-6 minutes. There is no reference to the source of information provided. The discussion and statements related to the Fire District and, in particular, operational capacities must be revised to reflect those conditions set forth in District's Capital Facilities Plan.
      2. A correct statement of the District's operational capacity is as follows: "Fire District #21 is not able to meet the standard of four (4) to six (6) minute response time ninety-percent (90%) of the time. Fire District #21 currently responds between twelve (12) and thirteen (13) minutes. These response times fall well short of the desired standard."
    - iii. See operational deficiencies related to the provision of urban levels of service outlined in the District's Capital Facilities Plan and the prior correspondence from Fire Chief Tom Fields of Whatcom County Fire District No. 21. This letter was submitted with the original application for the change to the Comprehensive Plan.

- C. The section entitled "**Proposed Expansions and Improvements**" should be revised to read as follows:

See Whatcom County Fire Protection District No. 21's Capital Facilities Plan.

- D. Change all references to either Fire District No. 3 or No. 13 to Fire District No. 21.

- E. Include the following in any update:

"The recent adoption of the Whatcom County Emergency Medical Services Plan requires the District to provide Basic Life Support transport of sick and injured persons to the hospital located in Bellingham. The average out of service time for transporting an individual to the hospital in Bellingham is over two (2) hours. This service has dramatically increased the District's average response time to fire suppression and emergency medical care incidents. Additional developments increase the number of Emergency Medical Service calls the District receives, which further causes an increase in average response times. The District's average fire suppression response time as of 2006 is twelve (12) minutes twenty-eight (28) seconds. The District's average emergency medical care response time as of 2006 is thirteen (13) minutes.

For more current data regarding response times and historical trends, see Fire District No. 21's Capital Facilities Plan and supporting documentation, including the District's Needs Assessments analysis."

2. The section entitled "Desired Health and Safety Future-Vision Statement-Public Health and Safety should be revised to read as follows:

### **"Desired Health and Safety Future**

#### **Vision Statement – Public Health and Safety**

Crime that periodically raises its ugly head in all communities has subsided considerably in the Birch Bay community as a result of crime prevention education and increased police presence. Further, the Community has matured; neighbors know their neighbors and neighborhood crime watch programs have caught on. Fire service and emergency response must be improved to established standards prior to approval of any urban development. Fire and emergency medical response time has increased considerably due to additional development and failing transportation systems. New revenue sources, such as impact fees or development mitigation fees, are necessary to provide for the upgrading of existing facilities and apparatuses and increased staffing with full-time fire and emergency medical service personnel. As a result of improved fire services, the fire insurance rates on residential structures may decrease significantly. Fire and police safety seminars are being conducted throughout the community on a regular basis."

3. The following corrections to Table 17-1 on page thirteen (13) of Chapter 17: CAPITAL FACILITIES PLAN are required, and thus proposed:

<b>"Type of Service</b>	<b>Birch Bay</b>	<b>Other Urban Areas</b>
Fire	See Fire District No. 21's Standard of Cover	
EMS	See Fire District No. 21's Standard of Cover"	

4. Add the following policies to goal LU 3 of Chapter 8 of the Birch Bay Community Plan:

LU-3c: Designate long-term planning areas in the Birch Bay Urban Growth Areas only where urban levels of fire protection and emergency medical services are planned for as indicated by a Capital Facilities Plan approved by the applicable provider of such services, including the necessary financing plan for the maintenance of such service levels.

LU-3d: Designate short-term planning areas in the Birch Bay Urban Growth Areas only where urban levels of fire protection and emergency medical services available are consistent with a Capital Facilities Plan approved by the applicable provider of such services.

LU-3e: Urban development, including subdivisions, commercial development and/or industrial development, should only be permitted and/or approved where urban levels of fire protection and emergency medical services exist at the time of development approval or arrangements have been made for such services to be available within six (6) years as indicated by and consistent with a Capital Facilities Plan approved by the applicable service provider including the necessary financing plan for the maintenance of such service levels.

5. Other changes to the Birch Bay Community Plan and the County Comprehensive Plan may be warranted as these revisions are made to assure consistency within and through the documents.

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