



BP Cherry Point Refinery
4519 Grandview Road
Blaine, Washington 98230
Telephone 360 371-1500

February 5, 2009

Mr. David Stalheim
Director
Whatcom County Planning and Development Services
5280 Northwest Drive, Suite A
Bellingham, WA 98226

RE: Whatcom 2031 - Comprehensive Plan Update

Dear Mr. Stalheim:

The BP Cherry Point Refinery welcomes and appreciates the opportunity to take part in the "Whatcom 2031" Comprehensive Plan review and update process. As active participants in the various planning processes within the community, we share the desire to effectively manage and plan for future growth and economic development within Whatcom County.

The "Whatcom 2031" work program constitutes the process through which the County will conduct the required seven-year review and update of the Whatcom County Comprehensive Plan (due in 2011) to ensure continued compliance with the requirements of the Washington State Growth Management Act (GMA). We understand that as a part of this process the County will conduct the ten year Urban Growth Area (UGA) review that is also required under the GMA. Additionally, we understand that Whatcom County will be working with county residents, stakeholder groups and other effected governments and agencies over the next three years to establish a coordinated land use vision for the next twenty years.

Though you have indicated that the primary focus of "Whatcom 2031" is to review existing residential and recreational UGAs, we would like to emphasize the long-standing history and value of the existing Cherry Point Industrial UGA to the economy of Whatcom County and the region.

Due to the unique characteristics of the Cherry Point area as a natural deep water port and its proximity to rail access and the interstate transportation system, the Cherry Point Industrial UGA has long been recognized both locally and regionally for its importance in supporting critical industrial operations such as the BP Cherry Point Refinery. As you are aware, the area has been utilized for industrial use since the 1950's. As demonstrated in the 1970 Whatcom County Comprehensive Plan, 1979 Cherry Point-Ferndale Subarea Plan and the current County-wide Comprehensive Plan, the Cherry Point area has been designated and planned for large-scale industrial use and development by Whatcom County for over thirty years. Additionally, both Washington State and Whatcom County have formally recognized the industrial use of this area as important long-term economic resource for the state since the development of the first Shoreline Management Program in 1976. This prioritization and designation was most recently reinforced by Whatcom County and the State of Washington with the passage of the Whatcom County Shoreline Management Program Update, which became effective August 8, 2008.

Overall, the Cherry Point Industrial UGA constitutes a majority of the industrial land supply that has been designated to meet the long-term needs of Whatcom County. The Comprehensive Plan, including Comprehensive Plan Goal 2BB and Policy 2BB-2, supports the need to maintain the unincorporated

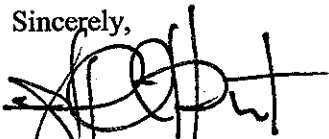
Cherry Point UGA and protect it from incompatible use and development. It is critical that Whatcom County maintain the existing Cherry Point Major Industrial/Port Industrial Urban Growth Area comprehensive plan designation and corresponding Heavy Impact Industrial (HII) and Light Impact Industrial (LII) zoning designations to ensure the long-term economic health and stability of the region.

The BP Cherry Point Refinery serves a key role in the Pacific Northwest's energy infrastructure and industrial base, and contributes significantly to the state and local economy. To date, BP Cherry Point is the largest refinery in Washington State and is the largest private employer in Whatcom County, employing approximately 1,400 BP employees and on-site contractors.

In addition to our economic contributions to the community, BP is proud of our demonstrated support and commitment to the ecological health of the Cherry Point area. We believe our long-standing voluntary actions to protect ecological resources of the Cherry Point area clearly reflect BP's environmental stewardship principals. We look forward to continued collaboration with our neighbors, the State, the Tribes and Whatcom County to address these important issues and contribute to the body of information and input that will frame the long-range vision for the growth of Whatcom County.

Thank you again for the opportunity to participate in this process. Please contact me at (360) 371-1825 or by e-mail at jeff.chalfant@bp.com if you have any questions or if you would like any additional information.

Sincerely,



Jeff Chalfant, AICP
BP Cherry Point Refinery

cc: Matt Aamot, Whatcom County Planning and Development Services
Elizabeth Daly, BP Cherry Point Refinery
Michael Abendhoff, BP Cherry Point Refinery