

4960 Northwest Rd.  
Bellingham, WA 98226

February 11, 2009

Whatcom County Planning Commission  
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Bellingham, WA 98226  
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RE: New Proposed Ferndale Urban Growth Area in North Bellingham Community

I am writing to express my concerns regarding the proposed expansion of the City of Ferndale's Urban Growth Boundary Area further into the North Bellingham Community (between Smith and Slater on the East side of I5). I have viewed the map with the proposed newly expanded Urban Growth Boundary. It is difficult to determine how much of this neighborhood is included, as street markers are missing, making it difficult to determine which properties are included. A more definitive map should be made available to the public, to help in this comment period.

Part of the purpose of the General Growth Planning process is to insure that urban growth is properly curtailed to existing urban boundaries (with projected population growth and job growth needs considered in any urban expansions), and to protect rural and agricultural areas for future generations. In previous planning processes, Whatcom County determined it was crucial to maintain a buffer between Ferndale and Bellingham cities, and to protect the rural nature of the North Bellingham Community. It was determined that adequate land exists within Ferndale's present boundaries and present Urban Growth area to serve the needs of the City of Ferndale for many years to come. Additionally, it was determined by both the City of Ferndale and Whatcom County processes that growth would occur by looking to the Western boundaries of the City of Ferndale in the future, due to major flooding concerns in the Eastern boundaries due to the Nooksack River flood plain, and existing rural and agriculture designations in the area.

The City of Ferndale was authorized to include property along I5 and the old Highway 99 for annexation, due to existing business development and prior agreements for water and sewer extensions (which required property owners to sign "No Protest to Annexation") in order to obtain needed services. While some rural property owners further East of Ferndale (North of Smith Rd.) agreed to sign No Protest forms, in order to qualify for water service extension (Deer Creek Park Water Association and Belfern property owners), much of the area is not serviced by these Associations. The Northwest Water Association, which provides service to more than 150 property parcels in a portion of the new proposed Urban Growth Boundary Area, were not required to submit No Protest forms when they negotiated a bulk water supply from the City of Ferndale. This

Association serves customers from Smith Road on the North, south to Slater Road (and further south on NW for almost one mile), and from I5 to both sides of Aldrich Road. While augmenting our water supply with Ferndale water as needed, the majority of water comes from our wells, under State water right. It is my understanding the Association plans to maintain their wells and water right long into the future, as they continue to maintain their rural water association and supply water to property owner members. It was clear to our members, during our negotiation meetings with Ferndale and our members, that the majority of our members at the time did not want to sign "No Protest to Annexation" forms in order to obtain water from Ferndale, and it was the majority members desire to remain part of rural Whatcom County.

Most of the property in this target area is single homes on 5 acres, the zoning and comp plan development level. Many of the properties are used for small family run farms, with domestic animals and crops. A portion of this property is zoned Public, where the County has its Library, Planning, Building Codes operations, as well as its lease agreement for a large portion of property with the Whatcom Soccer Association. There is also a gun range, a church, and cottage businesses which have low traffic demands. Most properties are on septic systems, with public properties being served by Ferndale Sewer under a special agreement which prohibits extension of sewer service to any other properties in the area. Some smaller parcels are located along Northwest Drive/ Road, which are grandfathered in as non-conforming uses established prior to rezone. This existing level of rural development is not anywhere near the level of development authorized by urban designation. The area does not have the infrastructure in place to support urban development, and the small taxpayer base does not support urban development. While some developers have sought to subdivide some of the larger parcels, presently open space or farms, they have not been successful if the property does not perk or produce a private well, as no or few water shares are available and no sewer service is available. The cost to provide these services in such a sparsely populated area will be cost prohibitive for the property owners and the City if they annex in the future.

When my husband and I purchased our home in 1973, we wanted and intended to live in Whatcom County (not a City). We desired to live in and raise our family in a rural area for all the benefits available by living in the County. We have participated in public processes to try to keep this area rural. We believe there are more affordable options for future urban growth in others areas adjacent to the City of Ferndale, which are more conducive for such dense development, at the time and point Ferndale requires such expansion. Statistics do not indicate now that there is any need to allow Ferndale to expand beyond their current Urban Growth Boundary Areas.

One of the comments I have heard from County Officials is that Northwest Drive/Road is constructed to the level to support a more dense development. I am not aware that the Growth Management Process uses road construction standards as a driving force to allow urban expansion. While previous officials made the choice when they repaved Northwest Drive/Road to upgrade the road base, and add a wider apron, they did not include enclosed ditches, curbs, or traffic controls to handle heavier traffic than what we experience today. Nor did they procure from property owners any more right-of-

way, beyond the present 30 feet, to allow for lane expansion or turn lanes in the future. Northwest Ave/Road contains numerous single family home driveways and numerous homes built close to the roadway. It was never intended to be a major county road, and the cost to purchase more right of way will be staggering to the County (or City if they expand into the area). Additionally many of the cross streets (like Slater at Northwest Drive) is substandard for large trucks, or combination vehicles to turn, in that it requires more than a 90 degree turn and no right to allow further expansion on the North or South of the intersection. Statistics show an increase in speed (exceeding 45mph) and the number of accidents due to the increased level of traffic as semi-tractors and cars seek to avoid the bottleneck of traffic on Meridian, and Hannegan Road. This is also contributed to by the amount of transient traffic generated at Cornwall Park Church (which requires their own State Patrol on Sundays to allow traffic safely out of their parking lot, even with the majority of traffic heading south to Bellingham).

I ask that the City of Ferndale, The General Growth Planning Commission, and the Whatcom County Council deny any request to expand the City of Ferndale Urban Growth Boundary Area further into the North Bellingham Community, as it is not required by population and job growth projections, the exorbitant added public cost to turn this primarily rural area into urban development, and the need and benefit to maintain rural property and agriculture in North Bellingham Community in Whatcom County for future generations.

Sincerely,

Catherine O'Connell  
Property Owner and Whatcom County resident