



P.O. Box 1517
Bellingham, WA 98227

February 12, 2009

Whatcom County Council
Whatcom County Planning Commission
311 Grand Avenue
Bellingham, WA 98225

Subject: Adopt the Wisest Population Projection for 2031 (~220,000 people)

Dear Members of the Whatcom County Council and Planning Commission:

One of the primary goals of Futurewise Whatcom is to protect our working farms, forests, and other rural areas from sprawling development. In order to support this goal, we recommend that Whatcom County adopt the lowest feasible population projection within the Office of Financial Management (OFM) range for the year 2031. We argue for a low population projection for two broad reasons:

- The lower number represents the preferred future for the people of Whatcom County, and therefore is the most appropriate basis for planning decisions.
- Political and fiscal prudence dictates that we select a course that can be adjusted to future conditions, and that we avoid a course that is difficult to undo, if our predictions prove inaccurate or our efforts inadequate.

In other words, Whatcom County should use a low number as the basis for future planning because it is both the right thing to do and because it is the least risky course of action.

By committing itself to a larger population number, Whatcom County would also be committing itself to build and pay for significantly more infrastructure and government services. Rather than over-commit ourselves, good planning and fiscal responsibility dictate that the County follow a more prudent course by selecting the lowest reasonable number, and then monitoring and adjusting as needed.

Because a lower number should be the preferred number for planning purposes, it should also be the preferred alternative for the environmental impact study (EIS) of the current 10-year review and revision of the county's Urban Growth Areas (UGAs). Specifically, Futurewise Whatcom recommends a population forecast of around 220,000 – a number that allows moderate growth in the smaller cities, and constrained growth in unincorporated areas of Whatcom County.

Steering Committee: Allison Aurand, Todd Donovan, Lynnea Flarry,
Eric Hirst, Michael Lilliquist, Charlie Maliszewski, Tris Shirley, Dan Warner
Chapter Director: Cathy Lehman

This letter provides a general sense of our position and the basis for our recommendations.¹ The attachment to this letter, *Ten Reasons for a Lower Population Projection*, provides additional explanation.

As a final note, Futurewise joins others who have pointed out that a planning goal brings little change by itself. Policies, programs, and land use regulations will need to be crafted to guide and manage the location and character of future residential development. We look forward to this next step.

Sincerely,

Michael Lilliquist
Steering Committee member

Eric Hirst
Steering Committee member

Cathy Lehman
Chapter Director
Futurewise Whatcom
360-224-8877

cc: Pete Kremen, County Executive
David Stalheim, Director of Planning and Development Services
Growth Management Coordinating Council

¹ We have expressed and explained our view to county officials several times during the past few months in letters to: Pete Kremen and David Stalheim 9/28/2008; Whatcom County Planning Commission 10/4/2008; Growth Management Coordinating Council 11/3/2008; and Whatcom County Council 12/12/2008.



Ten Reasons for a Lower Population Projection for the Whatcom 2031 Planning Project

February 2009

Futurewise Whatcom strongly recommends that Whatcom County adopt a 20-year population projection at the lowest end of the range provided by the Office of Financial Management (OFM), both in the near term for the Environmental Impact Study (EIS) and in the longer term to guide land-use policy and programs going forward. Specifically, we suggest a population projection around 220,000.

We do so for many reasons, including:

1. The Whatcom County Council should plan our future population based upon policy considerations, not simply accept past trends.
2. Whatcom County citizens strongly favor slower growth.
3. Whatcom County is losing its rural areas to sprawl at an alarming rate, and a lower population projection will support agricultural preservation.
4. The technical analysis in support of the GMCC projection is flawed and out of date.
5. A population number at the high end may drive the unnecessary expansion of existing Urban Growth Areas (UGAs)
6. Planning for high population growth commits the county and its municipalities to provide an unaffordable level of government services and infrastructure.
7. Policies and programs aimed at guiding the character and quality of growth do not depend upon a high population projection. We can accomplish these goals more easily under a low-growth scenario.
8. Slower population growth contributes to a better quality of life and preserves the diversity of lifestyles that Whatcom residents value.
9. Population projections are, in part, self-fulfilling prophecies.
10. A lower projection is less risky and easier to adjust to actual growth patterns in the future.

These reasons are explained more fully below.

1. Selecting a population projection is primarily a policy decision

One of the guiding principles of the Growth Management Act (GMA) is to allow local discretion to plan best for ways to prevent harmful sprawling development in rural areas. Therefore, the Act provides Whatcom County with complete discretion to adopt any population projection within the broad range developed by the state Office of Financial Management (OFM): about 219,000 to 330,000 residents in 2031. Any number within this range is permissible and justifiable.

Although based upon a technical analysis, the County’s adoption of a population projection is primarily a policy decision. Moreover, the policy decision must reflect the preferences of the county’s citizens—what we want the county to look like in 2031. To date, there has been little meaningful public involvement on the population projection and UGA review. The final decision must incorporate more and better public involvement, and must reflect the public’s concern about the harmful effects of population growth.

2. Whatcom County citizens strongly favor slower growth

The record on citizen preferences is clear. Surveys conducted by Bellingham and Whatcom County show unambiguous and consistent results. More than half the Bellingham citizens responding to its phone survey ranked growth-related issues as the single most important problem facing Bellingham.

Almost 2-1/2 times as many respondents to county-sponsored surveys and workshops thought the Growth Management Coordinating Council (GMCC) population number of 251,490 people was too high (almost 50%) as thought it was too low (20%); see Fig. 1.

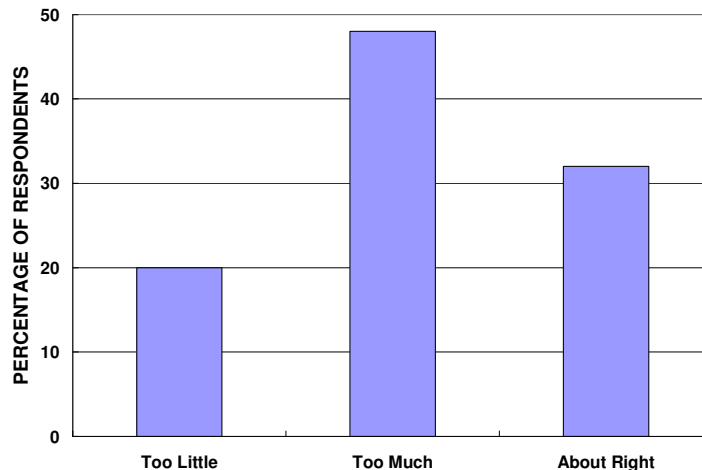


Figure 1. Responses from almost 400 people to question about projected population growth. Almost 50% thought the GMCC projection was too high, while only 20% thought it was too low.

These survey and workshop results show:

- People throughout Whatcom County are very concerned about the potential adverse effects of rapid population growth. These adverse effects include loss of farmland and other rural areas to sprawling developments, reductions in air and water quality, greater traffic congestion, and loss of the sense of “place” that makes Whatcom County enjoyable.
- Citizens can “connect the dots” between rapid growth and a declining quality of life. Because of the concerns listed above, Whatcom County citizens strongly prefer slower growth to more rapid growth. In particular, they think that the population projection for 2031 recommended by the GMCC (i.e., 251,490 people) is too high.

3. Whatcom County is losing its rural areas to sprawl at an alarming rate

Contributing over \$300 million annually, agricultural and resource land production is a cornerstone of our local economy, and it marks Whatcom County as the largest agricultural producer in western Washington. We need to control the rate of growth and sprawl to protect this vital economic sector. But according to several lines of evidence, Whatcom County's rural and agricultural lands are in serious jeopardy of conversion to residential use, thus undermining our local economy and quality of life in Whatcom County.

Data from the U.S. Department of Agriculture show that, between 1982 and 2003, an average of 1,200 acres a year of farms and forests were converted to urban uses. Worse, the pace of conversion is accelerating, from about 500 acres a year during the mid-1980s to about 2,000 acres a year in 2000 (Fig. 2). Thus, every two years we lose an area almost equal in size to Ferndale.

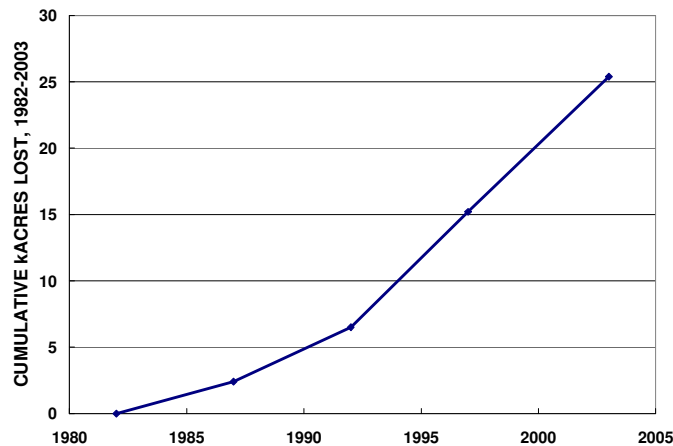


Figure 2. Whatcom County loses about 1,200 acres of rural land a year.

Using different data, the recent Census of Agriculture showed that Whatcom County lost 31% of its agricultural lands in just the five years between 2002 and 2007—the fastest rate of loss for any county in Washington State.

This loss of rural lands occurs for two reasons: expansion of UGAs (urban sprawl) and inappropriate developments within areas zoned for agriculture, forestry, and rural (rural sprawl). Outward expansion of existing cities probably accounts for only about one third of the loss of rural areas, with growth in the unincorporated rural areas accounting for the other two thirds. Selecting an unnecessarily high population projection may be used to justify this harmful trend towards population growth in the unincorporated areas.

The 2004 Comprehensive Plan called for adding only 205 people a year in the unincorporated rural areas between 2002 and 2022, to protect these areas and retain their rural character. In reality, four times that many people, 800 a year, settled in these rural areas between 1990 and 2008. Stated differently, 23% of the county's population growth during the past 18 years occurred in rural areas, compared with the 6.3% called for in the Comprehensive Plan.

Clearly, a big gap exists between policy and preferences on one hand and reality on the other hand. A higher population projection will create pressure to permit this dangerous and unwanted trend to continue.

4. The technical analysis in support of the GMCC projection is flawed and out of date

The technical results presented to the GMCC were based on analysis completed in 2002. WWU professor John McLaughlin reviewed that analysis and identified several statistical flaws. Perhaps more important, the latest results are merely updates of the 2002 work. That is, the current projections are extrapolations of pre-2002 trends with no new analysis. Obviously, today's local economy and housing market are entirely different from what they were in 2002. Given the national and global downturn, it is very unlikely that the economy will grow over the next few years as it did during the late 1990s and early 2000s. Relying upon recent past trends invites avoidable error.

The recent draft Land Capacity Analysis shows that our past planning efforts have included unrealistic and unjustifiably large Urban Growth Areas (UGAs). Now we must back track. Let us not make the same mistake again, by assuming ambitious and unaffordable population growth. Instead, Whatcom County should pick a lower, more conservative number, and then devote more of its planning efforts to guiding the character and location of growth that does occur.

5. A higher projection may drive unnecessary enlargement of UGAs

Although still in draft form, Whatcom County's recent Land Capacity Analysis provides strong evidence that existing UGAs are more than sufficient to provide for likely residential and commercial growth over the next 20 years. Indeed, as we have argued in the past, the sizes of several UGAs are far in excess of what can be justified based upon expected growth. However, if a larger population projection is selected, there will be pressure to increase some of these UGAs and pressure to resist reducing the oversized UGAs. Put simply, a larger population number will support a trend towards even more urban sprawl, thus defeating one of the primary goals of the GMA.

6. Planning for high population growth commits the county to providing an unaffordable level of government services and infrastructure.

By committing itself to a larger population number, Whatcom County will also be committing itself to build and pay for significantly more infrastructure and government services. This includes roads, bridges, stormwater and flood control measures, as well as fire, police, emergency, and public health services. Providing public infrastructure in residential rural areas is especially expensive on a per capita basis and is unsustainable in the long run without large tax increases. Cost of Service studies show that working and open lands generally return *three times* the revenue compared to the cost of public services that they use. Residential development is just the opposite. Residential development requires around \$1.17 in services for each tax dollar that it provides.¹ Put simply, sprawling residential development leads to

¹ These numbers are consistent across the nation, including neighboring Skagit County. American Farmland Trust *Fact Sheet on Cost of Community Services Studies*, August 2007.

either lower government services or higher taxes. In contrast, preserving our working lands contributes both to a healthy local economy and to local government's ability to serve its citizens.

The County and its municipal governments currently face serious budget shortfalls and can ill afford to subsidize new developments. Rather than over-commit ourselves in a time of budget deficits, the County should follow a fiscally responsible course and select the lowest reasonable number and then monitor and adjust as needed.

Whatcom County will also be hard pressed to create homes "affordable to all economic segments of the community" as required by the GMA. Without other actions by Whatcom County, a larger population just means more people who find it difficult to afford housing. A higher population projection will not improve housing affordability, because it will not alter the structural factors that govern affordability, such as external market demands and the cost of materials. Whether or not people feel compelled to seek cheaper housing in unincorporated parts of the county is independent of the total population. Even at the lowest feasible population projection, Whatcom County jurisdictions will be hard pressed to find the resources to meet the GMA housing requirement. Planning for any higher population projection will be overreaching, especially given the lack of adequate progress toward meeting this GMA housing requirement over the last several years.

7. Managing the character and quality of growth does not depend upon adopting a higher population projection

Some people have suggested that adopting a higher population projection will force us to confront the challenges of growth, and therefore will make progress on other important issues possible. While it is true that Whatcom County needs policies and regulations to manage the pace, location and character of future development, we can better achieve these goals under a low-growth projection. We need not shoot ourselves in the foot from the start. We do not need to accept one harmful situation in hopes it will also lead to improvements in other areas. Moreover, a higher projection is likely to create pressures and distractions that will hinder the County's ability to address these other important aspects of development.

8. Slower Population Growth Provides a Better Quality of Life

In considering alternative projections², members of the County Council should ask whether the average citizen is likely to be better or worse off in 2031 if the local population grows slowly or rapidly. We believe that most people will enjoy a much better quality of life if we plan for slower population growth. Among these benefits are:

- More farmland, forests, and other open space to provide us with food and fiber, wildlife habitat, clean water, and parks for outdoor recreation.

² A January 13, 2009 Memorandum from ICF Jones & Stokes to David Stalheim identifies potential alternatives of 218,981 (OFM low); 234,917 (the current official county projection for 2022); 251,490 (the GMCC recommendation); and 264,400 (OFM midrange).

- More affordable living due to lower local taxes.
- Less traffic congestion.
- Better air quality, better water quality (including a cleaner Lake Whatcom), and fewer fights about limited water supplies.
- More compact and attractive cities with convenient access to work, schools, shopping, parks and other amenities.

Planning for slower population growth allows our cities more time to plan for attractive and desirable infill and redevelopment strategies that focus population expansion in existing urban areas. The traditional alternative of continually expanding UGAs and allowing development to occur throughout our rural areas leads to sprawl, which is anathema to citizen preferences and to the GMA. A higher population projection may require the County to resort to UGA expansion, at the cost of time and effort directed at higher-quality forms of development.

9. Population Projections Are Self-Fulfilling Prophecies

Developers and builders, their financiers, and landowners know that a high population projection creates the pressure they desire to increase zoning densities and expand UGAs. Both of these government actions provide these interests with regulatory windfalls by greatly increasing the value of the land they own and develop. Once these lands are upzoned and/or included within a UGA, developers will market their properties throughout the country, encouraging greater local population growth than would otherwise occur.

Moreover, once an area has been designated as a UGA, it is difficult to undo for both practical and political reasons. Landowners make commitments and plans, relying upon the promise of future urban development. Going back on this implied promise creates losses that are as unearned as the original windfall. One way to insure greater predictability is to plan modestly and conservatively, and then monitor and adjust as needed.

10. A lower population projection provides a less risky, more flexible course

A 20-year land supply, even one based on the low projection, is more than enough to accommodate population growth for many years into the future. A 20-year land supply, if available in year one, is a 19-year oversupply. In other words, under no circumstances will we actually need a 20-year supply right away. We can adjust upward later. Therefore, it is most prudent to err on the low side, knowing that corrections can easily be made many years ahead of any need for additional land. (As we have seen, our current UGAs are far larger than needed in many cases.)

We can revise our land supply every few years if actual growth differs from what we anticipate. Selecting a lower projection today imposes no meaningful constraints on any jurisdiction in the County. Once enlarged, UGAs imply a promise of future development that is difficult to remove. While legally possible and often wise, reducing UGAs present significant difficulties that can be avoided by planning conservatively. Conversely, revising our projections upward based upon actual growth in the years to come is comparatively easy. Indeed, that is the intended purpose of the mandated 10-year review of UGAs.