

Kate Koch - GMCC Public Comment letter re Jones & Stokes 1-30-09 Memo

From: Amy L Mower <almower@earthlink.net>
To: Kate Koch <KKoch@co.whatcom.wa.us>
Date: 2/14/2009 8:50 AM
Subject: GMCC Public Comment letter re Jones & Stokes 1-30-09 Memo

To the GMCC and to PDS,

This comment letter raises several concerns with the population and employment analyses currently before the GMCC.

The analysis of population and employment in the Columbia Valley as most recently described in the ATTACHMENT: ALTERNATIVE ALLOCATION TABLES to the Alternatives – Suitability Analysis Approach Memo from ICF Jones & Stokes to David Stalheim dated January 30, 2009, in Exhibits 4 and 5, and 9 and 10, respectively, needs to be revised.

The current suggestions of a 2031 population for Columbia Valley of 7,608 for Historical Share Scenario and 6,410 for Current Comp Plan Scenario would represent respectively over a **50% increase** of the proposed (by PDS) 5,000 population in 2029, and over a **25% increase** of the proposed 5,000 population in 2029. Those suggested increases would have to occur over a 2 to 3 year period. It is unclear what such projections are based on, and they are quite dramatic. They do not appear to be realistic under any circumstances.

The GMCC projections are subject, for all communities, to the questions raised by public comment and by several Subarea Committee members previously throughout the entire Foothills Subarea Plan review process regarding both the EcoNorthwest 2002 projections and the EcoNorthwest 2006 projections. The GMCC projections are based on updates of 2002 EcoNorthwest projections, and include flaws from those 2002 analyses. Those comments equally apply now to the new extension of the 2002 projections to the 2031 projections.

In addition, the projections are flawed due to failure to account for the national credit and housing crises, as well as the decreasing supply of oil and increasing costs. Mere reliance on historical trends which were not subject to these crises is destined to produce unrealistic and inappropriate projections.

Regarding the employment projections, to go from a current basis of 43 employees to a projected 910 employees, as suggested by the ATTACHMENT: ALTERNATIVE ALLOCATION TABLES, is nothing short of astounding given that the 43 employees have developed at least over the course of 9+ years, since the UGA was established in 1999, and likely some of those employees existed prior to 1999. Surely then the UGA is unlikely to have a **21-fold increase in employment**, from 43 to 910 employees, even over the course of 32 years.

Please incorporate these comments into the Phase I projections for Columbia Valley UGA materials for the GMCC.

Thank you for your consideration.

Foothills Friends
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