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David Stalheim
Director, Planning & Development Services
Whatcom County
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Dear David:

Thanks again for taking time to respond to our February 12, 2009 formal comments to the Whatcom County Council and Planning Commission. We appreciate your ideas on the challenging issues that surround selection of a suitable population projection for 2031. You raise four points in response to our suggestion that the county adopt a projection of 220,000 people for 2031. Not surprisingly, our interpretation of the four points you raised differs from yours, as follows:

1. No evidence supports the low projection. There are no facts about the future and therefore no evidence to support *any* projection, high or low. Nevertheless, we support the low projection because we believe it is good policy (that reflects the best planning option) and because recent and current economic, housing, and environmental trends render business-as-usual, historical-trend forecasts largely irrelevant and incorrect. The current economic and housing-market situations are unprecedented over the past several decades. As evidence, we point to actions by the last (Republican) administration to commit \$700 billion to bailing out the financial industry and actions by the current (Democratic) administration to implement an even larger economic stimulus package. Clearly, the future isn't what it used to be, and planning as if historical trends will soon return is naïve and possibly dangerous.

We do not dispute the OFM's moderate forecast. Nor do we claim to know that the Whatcom County population in 2031 will be 220,000 people. Nobody knows what the population will be in 2031—not us, not the OFM, not PDS, and not their consultants. Given that uncertainty, what is the most sensible way to plan for population growth? We believe that the safest, most practical, most affordable policy is to base initial planning on the smallest acceptable number and then monitor frequently and make additional provision for population only when it is clearly necessary.

2. The land capacity analysis shows that the population projection Futurewise favors could be accommodated within existing city limits. While you appear to consider this a problem, we think the idea of living within our means is wonderful and necessary. If our cities continue to

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expand, eventually we will have *no* farms, *no* forests, *no* wildlife habitat, and *no* open space in Whatcom County. Clearly, we have to stop expanding the county's UGAs at some time. Why not now? It is long past the time to take our county's Vision seriously and enforce clear boundaries between urban and rural areas.

3. Undersizing UGAs would put pressure on rural and resource lands. Two wrongs don't make a right. This is like arguing that we should encourage teenagers to smoke so they won't drink. The problem of too much development potential on rural and resource lands is largely separate from the sizes of the county's UGAs and its population projection. The county needs to adopt and implement a variety of programs to remove incentives for development from these rural, agricultural, and forestry lands—and these programs are required regardless of the population projection ultimately chosen by the council and regardless of how big we make our UGAs. Recent PDS studies show that we have more than enough land in the UGAs to accommodate future growth; nevertheless, too much recent growth has occurred in the rural and agricultural zones. Because oversized UGAs have not helped protect rural areas in the past, there is no reason to believe they will do so in the future.
4. Public opinion, as expressed in last fall's surveys and workshops, is clear. About 32% of the respondents thought the GMCC recommendation was "about right," 48% thought it was "too much," and 20% thought it was "too little." Thus, almost half the people thought the projection was too high, compared with only 20% who thought it was too low. Your interpretation of these data is analogous to the following situation: A reading test administered to school children showed that 32% were reading at grade level, 20% were reading above grade level, and 48% were reading below grade level. On the basis of these results, the school administration decided there was no problem with the reading program and made no changes to improve reading scores. Our interpretation, here and with respect to the GMCC recommendation, is that a real problem exists that needs prompt attention. Public opinion clearly favors slower growth over more rapid growth.

Please let us know if you have any comments or questions about any of the points in this letter.

Eric Hirst, Steering Committee Member

Michael Lilliquist, Steering Committee Member

Cathy Lehman, Chapter Director

cc: Pete Kremen, Rebecca Craven, Greg Aucutt