

February 18, 2009

Whatcom County Planning Commission
Whatcom County Council
Whatcom County Planning and Development Services

Re: E.I.S. Scoping Comments – Whatcom 2031

To the Planning Commission and County Council Members,

Please accept the following comment on behalf of Homestead Northwest Inc, and myself personally as the current president of the Birch Bay Chamber of Commerce.

First, it is imperative that the E.I.S. study should include the Birch Bay UGA, and in fact, we feel that specific representation from the Birch Bay UGA should have been included in the technical Advisory Group (TAG).

Based on the E.I.S. scoping options presented, we are in support of Option Y – although benefits are seen with all the alternatives. Primarily, the reason for my choice has to do with the “Use of achieved densities for land capacity analysis” rather than “Use of planned densities for land capacity analysis”. From my perspective this is a vital difference, as evidenced in areas such as our own projects in Birch Bay., where the allowed density may be as high as 24 density units per acre, but the actual achieved density is less than 4 per acre.

Additionally, the option to “Test growth in a larger geography” as opposed to “Tests compact growth”, as it is my opinion that the Birch Bay UGA is currently undersized for the anticipated growth, as well as economic viability as an eventual city.

We appreciate the meeting with county staff Kate Koch, Gary Davis, and Peter Gill at Birch Bay last week; it was the Birch Bay community’s first opportunity to have direct access to both the information and individuals to discuss issues we have with the current Land Capacity Analysis. My concerns lie with outdated information as to Critical Areas and Wetlands, as well as already platted and approved projects that will not meet the planned density allocations and the concern over how zoning designations affect actual achieved density.

For example, in Birch Bay, the Resort Commercial zoning along the beach appropriately addresses development needs in a tourist area, but how does the transient nature of the housing units developed in that area affect the actual achieved density? How those units are counted towards population density when they will not be occupied by "residents"?

We feel that the Land Capacity Analysis needs to be completed to a higher level of accuracy before being used to establish capacity. Additionally, the effect of the tourism zoning on such a large portion of the developable acreage in Birch Bay and that effect on the need for additional commercial and industrial areas in the UGA add to my concern that the UGA as currently applied is not adequate to achieve the desired density and population growth.

It is in the interest of the members of the Birch Bay Chamber of Commerce, as well as my employer Homestead Northwest, Inc, that adequate study be given to the needs of the Birch Bay Community and the application of population densities and UGA boundaries.

Thank you for your attention to this matter,

Lisa Guthrie

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&

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&

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