



February 18, 2009

Whatcom County Council
311 Grand Avenue
Suite 105
Bellingham, Washington
98226

Whatcom County Planning Commission
Planning and Development Services
5280 Northwest Avenue
Bellingham, Washington
98226

RE: Request for Comments on Scope of Environmental Impact Statement (EIS) for 10 year
UGA Review

Honorable Council and Planning Commission:

Thank you for the opportunity to provide comment regarding the Scope of the Environmental
Impact Statement for the 10-year Whatcom County UGA Review.

Growth Forecasts and Allocations/Growth Patterns

History has shown that Whatcom County has consistently underestimated its growth
projections, traffic forecasts, and utility requirements. In general, population is growing, and
population projections from the State Office of Financial Management (OFM) for the current
planning period indicate that will continue to be the case. A smart thing to do is to plan
responsibly to accommodate our fair share of growth. This provides a level of certainty and
direction for which to manage things that affect our quality of life.

In order to end up with a legally defensible EIS as well as a practical, useful and dynamic
Comprehensive Plan it is absolutely necessary to include an adequate range of growth
projections in the analysis. Specifically, the range of population projections must be centered
around the "most likely to occur" population as published by the OFM.

Failure to evaluate the potential impacts for an adequate range of population scenarios will
result in the potential for a haphazard, disjointed pattern of growth with significant and
avoidable costs for infrastructure, environmental degradation, neighborhood disruption and
negative impacts to the quality of life of the current residents of the County.

The EIS Scoping document dated January 28, 2009 suggests that a limited range of
population projections will be incorporated into the EIS. It has been argued by some that the
County may reduce the range of the population projections and therefore reduce the
necessary land area to accommodate population growth. I feel this is a shortsighted approach
which can have significant unintended consequences. Some of these negative consequences
include the resultant lack of affordability of housing, creating an economic environment not
conducive for business and industry and also putting state and federal funding sources at risk.

If we underestimate the potential growth and it does in fact occur, the County will again find
itself in a position of reacting to the market, rather than proactively implementing the plan that
is in place. Monitoring the growth trends and trying to react to the market with ad- hoc



Comprehensive Plan amendments is an unpractical approach. Historically the market moves significantly faster than the Growth Management legislation can keep up with. The economic boom times come fast. The economic downturns come even faster sometimes. We have to have a plan in place ahead of time. The local economy needs a stable platform to be healthy. Constant tinkering with the land base of the community creates uncertainty and is disruptive to economic growth.

On the other hand, if we were to adopt a reasonable growth forecast, based on the historic trends we will be in a position to adopt a Comprehensive Plan that can accommodate those densities, setting aside lands for schools, parks, roads, public safety, infrastructure, etc. If the actual growth is less than the projection the County will not necessarily have lost anything and the unused lands will be reserved for the future. The establishment of future land uses does not necessarily promote growth for growth's sake, it promotes logical and orderly growth and preservation of the environment, community character and quality of life when growth does occur.

Alternatives:

The EIS as presented in the EIS Scoping document dated January 28, 2009 will not present an adequate range of alternatives.

The alternatives "X" and "Y" as presented result from a good deal of effort on the part of County staff and the "Growth Management Coordinating Council" (GMCC). However, these alternatives are focused on distributing a certain future population throughout the County, with the only real alternative being where we want to concentrate that population.

In order to end up with a legally defensible EIS as well as a practical, useful and dynamic Comprehensive Plan it is absolutely necessary to include an adequate range of alternatives in the analysis. Also, the range of alternatives must each examine the appropriate population scenarios.

The range of alternatives should be broadened to include an "Environmentally Superior Alternative (ESA)." "Environmentally Superior" implies natural environment. However, in the SEPA context, environment means both the natural environment and the built environment. Thus, the ESA should identify and evaluate not only the critical areas, but community character, cultural centers, existing employment centers, industries, agricultural areas, and the like and establish their priority for preservation.

The "Suitability Analysis" described in the EIS scoping documents is a useful tool for determining if a parcel of land is suitable for UGA designation, (and therefore ultimate development/redevelopment), however there first must be an alternative in the EIS that looks at the same areas for their suitability for preservation. Once areas have been established for preservation, we can then turn to the remaining lands and analyze their suitability for UGA.

Urban Growth Area Boundaries

The growth management model used for evaluating the original Urban Growth Area (UGA) lands within the County was significantly different that the model we are promoting for growth management today.



I attended the Growth Forums sponsored jointly by the City of Bellingham and Whatcom County during the years of 2004 and 2005. Recommendations for a "New Urbanism" and "Urban Village" growth model were published as a result of those forums. These recommendations were intended to guide the Comprehensive Planning Process.

The core of this issue is the determination of which lands are most appropriate to be added to the available land supply of the cities. The Growth management act provides direction for determining areas that should be designated for urban growth.

RCW 36.70A.110(3) states:

(3) Urban growth should be located first in areas already characterized by urban growth that have adequate existing public facility and service capacities to serve such development, second in areas already characterized by urban growth that will be served adequately by a combination of both existing public facilities and services and any additional needed public facilities and services that are provided by either public or private sources, and third in the remaining portions of the urban growth areas. Urban growth may also be located in designated new fully contained communities as defined by RCW 36.70A.350.

Consideration of the existing built environment is essentially in evaluating the appropriate UGA areas. I believe that selectively modifying the Cities' UGA to complement the existing built environment will prevent sprawl in the future and allow for a more efficient development pattern in the future. The lands we select, however must be the most efficient for accommodating the type growth those lands are intended for.

Land Use Maps / Growth Patterns

Lands most appropriate for dense urban village type development must be identified for that type of development. Lands most appropriate for lesser density residential development must be identified as such, lands most appropriate for commercial or industrial uses development must be identified as such and so on. Lands with significant natural constraints should not be over burdened.

The lands we include in the UGA should also represent the pattern of growth desired by the respective Cities and it is my understanding that the County has been and intends to continue to coordinate with the respective Cities in this effort. The City of Bellingham, for example has expended significant time and capital in anticipation of preparing certain areas within its current UGA for ultimate annexation. Many property owners within the UGA areas have moved forward in cooperation with the County and Cities with significant plans and permitting processes which represent decades of work and investment as well. This effort is on-going at this time in most cases. This kind of public investment must be recognized and respected. Each City must identify to the County their significant UGA study areas and the County must include these considerations in their EIS analysis.



Thank you for your consideration,

Best Regards,

A handwritten signature in cursive script that reads "Darcy Jones". The signature is written in black ink and is positioned below the typed name.

Darcy Jones, AICP PLS
Jones Engineers, Inc.

