

February 18, 2009

Whatcom County Planning Commission
Attn: Becky Boxx
5280 Northwest Road
Bellingham, WA 98226

Dear Commissioners and Council:

What follows are my comments on the Scope of the EIS.

1) Separate LAMIRDS and rural areas in the alternative analyses

The alternatives should evaluate the distribution of growth between truly rural areas and LAMIRDS. Many lots already exist within the existing LAMIRDS and it is likely that these areas will continue to receive some growth prior to being fully built out. A significant amount of development has taken place outside of the UGAs and Cities within these LAMIRD areas over the past ten years. Without a clear breakout of these areas it gives an appearance of rural development that is misleading and confusing. Separating out LARMIRDS and rural areas will allow for better informed policy for growth outside the cities and existing UGAs.

2) Alluvial fans and other hazards

Alluvial fans were not specifically named on the list of critical areas on page 5 of the ICF Jones and Stokes memorandum. I'm sure the list was not exclusive. However the extent of properties impacted by alluvial fans may be greater than published information would lead one to believe. The debris flow run outs on alluvial fans on a number of unnamed creeks during the January 2008 storm event extended well outside of identified alluvial fan hazard areas. One example was the debris flows in the Nelson Road area. Several of the debris flows extended well beyond mapped fan areas and in some cases took place in areas where no fan was indicated. The analyses should not depend solely on published information but should be reviewed by the County geologist in planning and public works personnel familiar with the recent debris flows.

3) Lake Padden

The city of Bellingham's current UGA includes a significant portion of the Lake Padden watershed. Lake Padden is at significant risk of damage from development due to phosphorus loading. The analyses should include the same level of concern as Lake Whatcom from the perspective of phosphorus loading and the challenge of avoiding impairing the lake for dissolved oxygen.

4) Service Areas/Land Use

While land may be within service areas and existing UGAs, the delivery of services into those areas may be expensive and very inefficient. The January 2008 decision by the City of Bellingham to not annex two large pending plats between Yew Street and the city limits due to exceedingly high costs to complete services should be a cautionary tail. Where possible, the analyses should include information regarding costs and plans for paying for those costs. City staff reports that presented costs associated with annexations should be included in the analysis and presented in a manner that will help policy makers determine the most appropriate locations for growth or areas that were previously designated for urban growth to be removed. A similar

case could apply to the city park plan service area. While the plan may designate a certain level of service, it is likely unreasonable to assume that the level of service planned for can be achieved under the current funding schemes.

5) Suitability Analysis Study Area

While it makes sense to include the areas that within existing UGAs, it is not entirely clear how areas that fall outside of the UGAs were selected for inclusion or were left out. For example, I would be curious about potential growth outside the current Bellingham UGA between the UGA and the flood plain of the Nooksack River west of the airport. Given that the airport area contains significant future industrial land where one would suppose there may be job creation, having a residential area within close proximity of that job center would be a sound area for development. So why leave this area out? It may be that there is information already available that this area would not be suitable, but that information should be presented to policy makers. This same argument could be made for the area northeast of Bellingham. Leaving these areas out because they are not represented by a single large property owner that attends every planning meeting regarding growth does not appear fair and leaves to question what are the most suitable areas for growth.

Conclusion

Overall I like the approach that has been outlined and have been impressed at the progress this enormous task has been moved forward. I look forward to the draft EIS.

Thank you

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