

## Kate Koch - Fwd: Comments on 10-year UGA Review DEIS

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**From:** David Stalheim  
**To:** Kate Koch; Lisa Grueter; Matt Aamot  
**Date:** 6/22/2009 8:45 AM  
**Subject:** Fwd: Comments on 10-year UGA Review DEIS  
**Attachments:** Hirst on UGA DEIS 6 21 2009.pdf

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>>> Eric Hirst <EricHirst@comcast.net> 6/21/2009 1:46 PM >>>  
Dear David,

Attached are my comments on the Draft Environmental Statement for the Whatcom County Urban Growth Area Review.

A careful reading of the Draft EIS for the Whatcom County 10-year UGA Review yields four clear conclusions:

- The more population grows in the future, the worse conditions are for current residents. That is, the county's natural systems (air, water supply and quality, earth) and human systems (transportation, parks and outdoor recreation, fire and emergency services, water supply and treatment systems, stormwater management) are already operating beyond sustainable limits; any increase in population will further stress these systems and degrade the quality of life for today's citizens. Therefore, the county should choose the lowest feasible population projection for 2031.
- The more that population is concentrated within existing city limits (rather than unincorporated UGAs and rural areas), the less severe are the adverse environmental impacts.
- Therefore, the county should, to the maximum extent feasible, shrink existing UGAs. For Lynden, the county should adopt a population projection that can be accommodated within existing city limits because any expansion will irreversibly convert land with prime agricultural soils into urban development, which is contrary to public opinion and county policy.
- Future population growth should be concentrated within existing cities and away from the county's rural areas. Because more than one-fourth of recent growth has occurred in these rural areas, the county should adopt policies and programs that will dramatically slow the conversion of farms, forests, and other rural areas to suburban uses.

Eric

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June 21, 2009

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## **Comments on 10-year Urban Growth Area Review Draft EIS**

Dear David:

### **Summary**

My review of the draft environmental impact statement for the 10-year UGA review suggests the following key points:

- **Population projection:** The No Action Comprehensive Plan (NAC) is the preferred option among the four analyzed because it has the least adverse environmental impacts. Although not examined in the DEIS, this alternative surely has the lowest need for public infrastructure investment and, therefore, the smallest tax increase to provide this infrastructure to support new growth. It also has the lowest mitigation costs necessary to offset the adverse environmental effects of new development associated with population growth.
- **Population allocation:** The county should focus population growth away from the rural areas and into the cities. One way to achieve this goal is to adopt the NAC alternative as the upper limit for population growth. The county could then allow each city to select its preferred population growth so long as (1) the sum of the preferred projections plus the number of people projected for the county's rural areas is less than or equal to the total population projected for 2031 in the NAC alternative (adding 43,917 people between 2008 and 2031), and (2) no increases in the sizes of the individual UGAs.
- **Government finances:** A key chapter is missing from this DEIS—one that analyzes the financial costs of future growth and the likely effects of such growth on local taxes. The County and cities need to prepare financial plans that show the capital costs for needed infrastructure to accommodate population growth for these four scenarios. Absent a credible plan (i.e., one that can actually be funded), none of these alternatives makes sense. Analysis of the capital costs to accommodate future population growth and the revenue sources to match these costs would show: (1) the absolute necessity for development impact fees to pay for the needed infrastructure and (2) tax increases and/or level-of-service declines for the average citizen that increase with overall population growth.
- **Alternative Y is poorly defined.** It has the small cities growing rapidly (which may be what they want), but it also has rapid growth in the rural areas, which almost everyone opposes. I hope the final EIS will disentangle these two contradictory features of this alternative.

- The DEIS shows that the No Action Trends alternative has the worst environmental effects of the four alternatives. This suggests that we must change course and plan for slower population growth and less development in rural areas.

## Details

The remainder of this letter cites various parts of the DEIS that show that the No Action Comprehensive Plan alternative is the best one for Whatcom County. It should be no surprise that this is the case, for two reasons. First, the NAC alternative has the lowest population projection for 2031: 234,917 v 258,444 in the other three cases. Second, the NAC alternative has the lowest population growth in the rural areas of the county: an addition of 3,359 people v 4,257 to 15,388 people in the other three alternatives.

With respect to *earth* impacts, “The No Action Current Comprehensive Plan Alternative would have the least potential for these impacts [erosion, sedimentation, earthquakes, volcanic eruptions, and landslides] ... .”

On *air quality*, the NAC alternative has a much smaller increase in vehicle-miles traveled than any of the other three alternatives and, therefore, much less air pollution.

With respect to *water resources*, forest removal and creation of impervious surfaces “have significant influence on natural water systems.” “All alternatives would probably exacerbate flooding in mapped flood hazard areas to some degree ... .” “The NAC alternative would result in the least amount of new impervious surface within existing UGAs and rural areas ... .”

Chapter 4.3 of the DEIS notes that “TMDLs, also called Water Quality Improvement Projects, have been established for the Bellingham Bay, Johnson Creek, Lake Whatcom, Nooksack River, Sumas River, and Whatcom Creek.” These, as well as other water bodies listed in Table 4.3-12, are ones impaired by pollution under federal Clean Water standards. This suggests we already have many major water bodies that are polluted. How will we be able to clean these waters while we allow population to grow over the next two decades? Don’t we need a viable plan (i.e., one that is likely to work and can be funded) before we accommodate more people? Where will the money come from for this cleanup work?

For groundwater, the destruction of forest cover and creation of impervious surfaces associated with developments have two adverse effects on water quantity: (1) reduced recharge of aquifers, which lowers water tables and lowers flows in streams, lakes, and wetlands; and (2) increased demands for groundwater. In addition, development will likely affect water quality. As Chapter 4.3 notes, “It is not practical or feasible to fully mitigate all the impacts on surface water resources from these mechanisms [forest removal and creation of impervious surfaces], so avoidance is the most effective strategy.” Also, mitigation and engineered systems “may not be effective in replicating pre-existing [natural] conditions.” Table 4.3-4 shows that total addition of impervious surfaces for the 4 alternatives: 4,634 acres for NAC, and between 7,169 and 7,624 for the other three.

For *transportation*, the number of miles of state highway expected to exceed the level of service is much lower for the NAC alternative than for the other three (30 miles v 36 to 43 miles). To the extent population grows and a larger fraction lives in rural areas away from Bellingham, traffic and congestion will get worse.

For *Fire and Emergency Services*, the NAC “is expected to provide the least [smallest] increase in calls for fire and aid service, and thus the least projected increase in facility needs of all the alternatives for fire districts serving urban areas.” “UGA expansion or rural growth ... could increase driving distance and response time to the larger population.” Once again, the NAC alternative yields a better outcome than the other three.

For *Parks and Recreation*, the NAC alternative results in a deficit of 15 acres of developed park land plus 19 miles of trail. The other alternatives have much higher deficits of 241 acres and 37 miles of trail.

With respect to *Water Systems*, “Under all alternatives, if the City of Lynden is unable to resolve its water rights dispute with the Washington State Department of Ecology, the City will experience a water deficit. Birch Bay Water and Sewer District and Evergreen Water and Sewer District appear to have current or future water supply deficits.” These results suggest that Whatcom County may already be short of water, a problem that will be made worse as population grows. Clearly, the greater the population growth, the greater the problems associated with water supply. Unless the cities and county can assure themselves that the water supply and money to build water-supply systems are available, it makes no sense to plan for a large population growth.

For *stormwater management*, additional development implies a loss of forest cover and more impervious surfaces, both of which reduce the amount of rainwater intercepted by trees and infiltrated into the ground. Therefore, more money will be needed for stormwater management. For the NAC alternative, “... overall impervious surface and overall needs for stormwater drainage and treatment facility capacity would likely be lower [than for the three other alternatives].”

Finally, for *solid-waste management*, the NAC alternative has the least impact.

This small sample of quotes from the Draft EIS shows clearly that any growth leads to adverse environmental impacts across many dimensions. The more rapidly population grows, the more severe are these impacts. And the more growth that occurs in the rural areas, the more serious these problems become.

## **Conclusions**

A careful reading of the Draft EIS for the Whatcom County 10-year UGA Review yields four clear conclusions:

- The more population grows in the future, the worse conditions are for current residents. That is, the county’s natural systems (air, water supply and quality, earth) and human systems (transportation, parks and outdoor recreation, fire and emergency services, water supply and treatment systems, stormwater management) are already operating beyond sustainable limits;

any increase in population will further stress these systems and degrade the quality of life for today's citizens. Therefore, the county should choose the lowest feasible population projection for 2031.

- The more that population is concentrated within existing city limits (rather than unincorporated UGAs and rural areas), the less severe are the adverse environmental impacts.
- Therefore, the county should, to the maximum extent feasible, shrink existing UGAs. For Lynden, the county should adopt a population projection that can be accommodated within existing city limits because any expansion will irreversibly convert land with prime agricultural soils into urban development, which is contrary to public opinion and county policy.
- Future population growth should be concentrated within existing cities and away from the county's rural areas. Because more than one-fourth of recent growth has occurred in these rural areas, the county should adopt policies and programs that will dramatically slow the conversion of farms, forests, and other rural areas to suburban uses.

Thank you for considering my views on the 10-year UGA review.

Eric Hirst

cc: Whatcom County Council  
Whatcom County Planning Commission