

**Kate Blystone - West Blaine UGA**

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**To:** <pkremen@co.whatcom.wa.us>, <council@co.whatcom.wa.us>, <pds@co.whatcom.wa.us>, <PDS\_Planning\_Commission@co.whatcom.wa.us>  
**Date:** 9/15/2009 7:28 PM  
**Subject:** West Blaine UGA

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To: Executive Kremen  
CC: County Council, PDS and Planning Commission  
Date: 9.15.09  
Re: West Blaine UGA

Dear Executive Kremen:

I read with concern the additional comments reflected in your updated 9/9/09 UGA Recommendations for Blaine. Please do not reconsider your proposal to remove the existing West Blaine UGA based on letters received from property owners along Semiahmoo Parkway who wish to receive sewer lines. This is only one of a multitude of issues that must be considered with regard to removal of the West Blaine UGA. Please make your determination based the needs of the entire County.

The most relevant fact has not changed... Blaine's existing UGAs are vastly oversized for the city's anticipated growth, which violates the requirements of the GMA. Your August 17, 2009 proposal wisely reflected removal of the West Blaine UGA in full, based on the harmful impacts that urban development would have on the ecological integrity of Drayton Harbor, an important, but impaired body of water. Instead, it was your recommendation to utilize the East Blaine UGA to accommodate commercial and industrial growth.

The values reflected in your August 17, 2009 Recommendation have not changed.. the need to protect our water supplies and environment, the need to allocate County urban growth only in those places where it is needed, and reliance on urban infill rather than rural sprawl. Allowing the West Blaine UGA to exist is in contradiction of all of these GMA-complaint goals.

I was present at a County Council meeting where Steve Hood, from the Department of Ecology, stated that properly maintained septic systems were no more environmentally harmful than urban sewer lines. Thus, the most appropriate way for the residents in the West Blaine UGA to quell their concerns regarding the environmental impact of septic systems is to ensure that their own systems are properly maintained and functioning. The County enacted an OSS Program to address these very concerns and this should provide a greater degree of environmental protection.

Moreover, it is also important to remember that the West Blaine UGA contains shoreline property, which is only 50% developed. Allowing additional urban level residential development along the West Blaine shoreline poses a much greater environmental threat than does the continuing use of septic systems for existing residences. I attended the last County Council public hearing on UGAs and recall strong public opinion in favor of removing the West Blaine UGA based on environmental considerations.

As you are obviously aware, the majority of land in the West Blaine UGA is owned by Trillium Corporation. I find it troubling that Terry Galvin, the Director of the Blaine Community Development Service Department would oppose the removal of the West Blaine UGA, in part, because this would be unfair to Trillium's investment expectation. All land investment is speculative in nature, and as Trillium and Blaine are aware, land speculators are always subject to changes in zoning and land use regulations unless they have vested their rights under state law. To expect the County to, in effect, indemnify a private corporation against normal investment risks by maintaining an unnecessary UGA violates both public policy and GMA law.

If you would like to know what the West Blaine UGA would look like if it was annexed by Blaine, look no further than the Semiahmoo Spit and adjacent uplands. The dizzying rate of dense development and the lack of meaningful mitigation exemplifies the ecological damage that can be expected within the Drayton Harbor and Semiahmoo Bay watersheds. Blaine is under pressure to provide 3% growth per year simply to pay for its updated capital facilities. That pressure is increased by the fact that one corporation owns a majority of land in and around Semiahmoo, and that the Community Development Service Department is small and in the current economy, must deal with resource problems. These factors make it difficult for urban development and environmental protection to co-exist within the West Blaine UGA.

For the totality of reasons cited above, I urge you, and the County Council and Planning Commission to recommend that the West Blaine UGA be re-designated as rural land, and that a meaningful review of BAS and BMP be undertaken to determine what additional measures can be enacted to more effectively protect Drayton Harbor, Semiahmoo Bay and our marine shorelines and nearshore habitat.

Sincerely,

Wendy Harris,  
Bellingham Resident