

FOOTHILLS FRIENDS  
PO BOX 1876  
MAPLE FALLS, WA, 98266

April 28, 2008

Whatcom County Planning and Development Services  
5280 Northwest Ave  
Bellingham, WA 98226

*Attn: David Stalheim, Director; Martin Blackman; Gary Davis; and Matt Aamot*

Re: (1) Independent Traffic Analysis; and  
(2) Balfour Village Traffic Analyses; and  
(3) SEIS for 2007 Draft Foothills Subarea Plan

Gentlemen:

Attached please find an Independent Traffic Study for traffic counts conducted in February and March 2008 on the Mt. Baker Highway from Kendall to Glacier. The study was performed by the Tilghman Group of Seattle WA for Foothills Friends. The Tilghman Group has over 24 years of experience in analyzing transportation demands for a wide variety of land uses.

Foothills Friends urges Whatcom County to utilize this report. We believe that it provides superior knowledge to the traffic data which is currently being used by Whatcom County pertaining to traffic in the east county.

We request that this information be incorporated into the Foothills Subarea SEIS as a supplement to the Study recently completed by the Transpo Group for Whatcom County.

We also ask that the information in the Tilghman Study be incorporated into Whatcom County's review and analysis of the proposed Balfour Village application.

After you have an opportunity to review the attached Study, we would like to meet with you to discuss the Study, and your response to the Study.

As shown by the Tilghman Study, the Kendall traffic counts for the proposed Balfour Village application are seriously flawed and, with the passage of time, outdated under engineering standards. The Tilghman Study together with correspondence and comments previously delivered to John Everett, both in connection with the 2008 SEIS and the 2007 review of the entire Balfour Village TIA, provide an analysis of the inadequate methods, results and consequences of the Balfour Village Kendall Traffic Counts.

As part of that correspondence, Mr. Tilghman sent a letter dated February 15<sup>th</sup> 2008 to Mr. Everett, addressing critical issues with the features of the rural road system in the Foothills, for consideration in the 2008 SEIS. A copy of that letter is enclosed for your reference.

In as much as the County and Transpo Group utilized the Balfour Village Kendall traffic counts as the basis for the analysis for the Foothills Subarea SEIS, inherently then the information in the Transpo Study will be flawed. As of this time, Foothills Friends and Mr. Tilghman have not had an

opportunity to review the Transpo Group Study, and as such reserve the right to make their comments on that report.

We believe that the Tilghman Report and correspondence go far beyond what might be considered "public comment". Rather, this independent report should be incorporated and used by Whatcom County as additional substantiated data for traffic patterns particularly around the intersection of State Highway 542 (Mt. Baker Highway) and State Highway 547 (Kendall Road).

Foothills Friends obtained these traffic counts and the Tilghman Report to "do the right thing". We urge Whatcom County to do the same, for both the Balfour Village PUD Application and the Foothills SEIS. Please give this well prepared report the credit it deserves as you conduct your analysis and as you make your decisions on the Balfour Village PUD Application and as you make your recommendations on the 2007 Draft Subarea Plan to the residents of the Foothills and to the members of the Whatcom County Planning Commission and County Council.

Thank you for your time and consideration. We can be reached by telephone at either 360-599-3372 or 360-734-1200 ext. 3205, or by email at [almower@earthlink.net](mailto:almower@earthlink.net) or [MHead@haskellcorp.com](mailto:MHead@haskellcorp.com). We look forward to hearing from you.

Sincerely,

FOOTHILLS FRIENDS, a Washington non-profit corporation

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Amy L. Mower, President

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Michael Head, Vice President

cc WSDOT

attn: Roland Storme, Mike Koidal, Elizabeth Sjostrom, Todd Carlson