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June 3, 2008

Whatcom County Planning & Development Services
5280 Northwest Drive
Bellingham, Washington 98226

Attention: Mr. David Stalheim, Director
Mr. Martin Blackman, Long Range Planning Supervisor
Mr. Matt Aamot, Senior Planner

Subject: Letter of Concern – Foothills Subarea Plan (Draft) Fails to Meet
Requirements of RCW 36.70A.070 – Mandatory Elements:
(1) Erroneous and Incomplete Data: Section 7 – Economics
(2) Internal Inconsistencies Within The Document Related to
Economic Data

Gentlemen:

I write today to urge you, the Planning Commission, and County Council to take particular care to review and require corrections, and possibly re-work, to economics data contained within the Foothills Subarea Plan (FSP) prior to adoption.

Despite an aura of credibility that this work is based on reliable facts, the document contains significant errors and omissions and numerous internal inconsistencies so extensive that I believe the Subarea Plan fails any reasonable test of RCW 36.70A.070 – Mandatory Elements, which states

(Introduction) "... The plan shall be an internally consistent document..."

and...

"(7) An economic development element establishing local goals, policies, objectives, and provisions for economic growth and vitality and a high quality of life. The element shall include: (a) A summary of the local economy such as population, employment, payroll, sectors, businesses, sales, and other information as appropriate; (b) a summary of the strengths and weaknesses of the local economy defined as the commercial and industrial sectors and supporting factors such as land use, transportation, utilities, education, workforce, housing, and natural/cultural resources; and (c) an identification of policies, programs, and projects to foster economic growth and development and to address future needs. A city that has chosen to be a residential community is exempt from the economic development element requirement of this subsection."

Although this may seem a very long commentary, I believe it raises many important issues that require attention.

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LONG RANGE
PLANNING DIVISION

I. Overview and Background

I am a long term local resident. I worked professionally as the administrative and business manager of a large engineering firm in Bellingham for many years. More recently (and currently) I have provided bookkeeping and general accounting services to local Foothills businesses. Therefore, I am intimately familiar with *both* the local economy *and* state and federal statistical reporting requirements for employment and business activity. I followed details related to the development of the Foothills Subarea Plan (FSP) update with deep interest.

While I could only personally attend a small number of Foothills Subarea Plan Advisory Committee (FSPAC) meetings, I did read *all* meeting summaries available to the public as work progressed, including each record of "recommendations and decisions" March 2006 through November 2007.

Throughout the Advisory Committee planning process numerous statistics presented by Whatcom County Planning & Development Services (PDS) and its consultants appeared strikingly odd, incorrect, and unrepresentative of the local Foothills economy as I and others know it. When questions were raised about likely errors, the draft was referred to as a "work in progress." Critics were encouraged to wait until the final draft was released to see final corrections to, or explanations for, the Plan's most significant and obvious statistical flaws.

I attended two public presentations of the "final" Foothills Subarea Plan – the "community roll-out" on October 15, 2007, and its presentation to the Planning Commission on November 29, 2007. I obtained a complete copy of the final draft document including supporting documents included by reference.

When I reviewed the final draft in its entirety, I found that many specific "doubtful figures" in tables and text remained. Also, many cross-referenced "statements of fact" had appeared (imbedded in land use and economic analyses and conclusions). These were inconsistent numerically, in terminology, and in regard to time frame.

I contacted Whatcom County PDS to inquire about specific apparent errors in "Table 7.2 – Taxes Collected from Taxable Retail Sales, Foothills Subarea, 2005" – intended to "indicate" the nature and extent of local economic activity. I thought, perhaps typographic or other simple math errors might have occurred. Amounts of "tax" collected for various retail categories seemed entirely out of scale, and others seemed out of place (see II. Details, below). PDS staff couldn't answer why "*wholesale*" would be included in a table of "*sales tax*" activity; "but these were the numbers that its consultants (ECONorthwest and Studio Cascade) and the Advisory Committee provided." Further, PDS explained that ("per the footnotes") the group knowingly incorporated economic and employment data for geographic areas that "don't necessarily match" the boundaries of the Foothills. The only explanations offered were that Census Block 5 has a square mileage similar to that of Census Block 7, and "sometimes the public just has to accept these things on trust." I found it difficult to accept such an apparent indifference to facts in a plan intended to affect our community for the next twenty years.

Independently, I contacted the Washington State Department of Revenue (DOR) and the Office of Financial Management (OFM) in an attempt to verify and correlate the statistics and statements presented in the Plan. The information that I obtained from DOR included ALL

economic activity – not just retail "tax collected." Obtaining more complete information confirmed and amplified my concern that the economics section fails to correctly summarize the "...sectors, businesses, sales, and other information as appropriate..." as required in Mandatory Elements.

I filed an official Public Records Disclosure request in the hope of obtaining detailed source data for the statistics cited. Unfortunately, PDS limited its official response to sending nothing more than the consultant's previously released summarized figures for sector activity (with the same errors and omissions), along with a polite but total refusal to release any details whatsoever regarding the employment statistics. PDS cited "confidentiality" constraints regarding those. (I have attached a copy of the official response to my public information request for your reference.)

It is deeply troubling to me as a citizen to find Whatcom County's position regarding disclosure of these details evasive – certainly *not* forthcoming. Is it County policy to publish figures that it can't or won't verify? Identification of businesses included in group counts (revenue sector) would not reveal the size or profitability of any single business. The identification of employers (by sector and/or location) would not have to reveal any firm's pay scale, individual's wage, nor any other justifiably confidential fact.

On a recent occasion (at a UGA review hearing), I witnessed "County legal" asserting that, once published, department work is irrefutable in the eyes of the law. I shudder to think that Whatcom County should take this position regarding the transparency of the FSP during its review period – a process that *should* ensure that work is complete and reliable.

Section II below lists some of the most egregious statistical errors, omissions, and misleading "statements of fact" that have not been substantiated. Section III provides examples of numerous "internal inconsistencies" within the document. **Together, these flaws are so significant I believe they violate RCW 36.70A.070. Incorrect and inconsistent, I believe this material would fail review by the Hearings Board.** (You will require a copy of the Draft Plan to follow the references.)

II. Details of Statistical Errors

1. Erroneous and Incomplete Data: Section 7 – Economics

a. Page 67 of the FSP states that ECONorthwest (and Studio Cascade) used data for Census Block groups 1, 2, 3 and 5 of Tract 101 in Whatcom County instead of Block groups 1, 2, 3 and 7 of Tract 101.

How significant is this? Census Block 5 is essentially outside the Subarea – located south-southeast of the Foothills (east and south of Acme). Without analyzing the economy of Block group 5, anyone even remotely familiar with Whatcom County should understand that the economic character of this area differs greatly from Census Block 7, which includes Glacier.

It appears that data for Census Block 7, which *does* include Glacier, *were not used*. "Greater" Glacier includes two fairly built-out recreational housing developments, and two condominium developments (Snowater is quite large). Glacier has shops for ski and

snowboard sales and rentals, restaurants, bed & breakfast establishments, real estate offices/agents, a grocery store, and a manufacturing business of significant size by Foothills standards. *Arbitrarily "substituting" data from another Census Block, for whatever reason, most certainly affected the analysis of the Foothills economy.*

b. Regarding "Table 7.2 – Taxes Collected from Taxable Retail Sales, Foothills Subarea, 2005" (Page 69):

- It is inconceivable that "wholesale" should be included in a "taxable retail sales" table (read Footnote 2). What sort of data is this, actually? A list of B&O tax paid to DOR per NAICS code? PDS and its consultants won't reveal details.
- Regarding the actual figure of \$110,110 given for "Wholesale Trade" -- this figure would most certainly be low. I know, firsthand, that for one Foothills business alone 2005 wholesale activity exceeded \$1,000,000. What is the basis for the \$110,110? PDS won't reveal any details.
- Mining, Utilities and Construction – 54 establishments? \$4,962,059? *In retail sales tax collected?* That's huge. I question the number. What was included, and what was excluded*? (Re-read Footnote 2.) Does this reflect business activity in Census Block 5? What an odd mix to find in a "retail" table. Again, PDS won't reveal any details.
- The figure given for manufacturing is vastly understated given my firsthand knowledge of local activity. Again – is this *sales tax* or gross activity? The table says there were eight manufacturers. Add seven firms to the one I know well, the figure must be wrong. PDS – details?
- The figure for "taxable retail sales" for "food and beverage stores" is *extraordinarily* high. Because food is not taxable (again, back to Footnote 2), the non-food component (sundry) sales would have had to be truly incredible in 2005 (\$25,465,534.88 gross) for *tax collected* to have been \$2,190,369. The Foothills has a small number of "mom & pop size" local stores. PDS won't reveal any details to substantiate this number.
- Supposedly there was \$370,358 in *sales tax* collected for "building material, garden equipment, and supplies". There are SIX retail establishments of this type in the Foothills*? Was gravel included as a building material? Anyone living in the Foothills would question the figure for this "sector," even if this were a sum of gross activity. Details? Zero.
- The total *tax collected in dollars* (\$5,011,548) given for "Accommodation and Food Services" (23 establishments) also seems extremely high. How high? If tax collected represented even 10% of gross sales (which would be possible if lodging tax were included in the figure), total activity for this "sector" would have had to have been \$50,115,480.00 in 2005 – that's over fifty million for 23 businesses. That would mean an average gross revenue per business of \$2,178,933. Did the average Foothills food service or accommodation business gross over two million in 2005? I doubt it. This needs to be substantiated and/or corrected (*with substantiation* for the correction, second time around).

- I question ALL remaining "sector" data shown in Table 7.2 *to an equal degree*, for similar reasons.
- *** At a minimum, we should be able to see a list of "establishments" that comprise the total for each category in this table, and gross activity for each category.** Since no single category lists only one establishment, such a list would not compromise confidentiality by revealing the gross activity for any single business. Without such a list, **the validity of the entire table is questionable.**
- **REGARDING "FOOTNOTE 2" (page 69): I don't believe this "caveat" excuses this table, or this entire section, from providing a bona fide "summary of the local economy" required by "Mandatory Elements."**

c. Per PDS, sales data for Dodson's Market, a large grocery store located more than three miles west of the subarea boundary (serving a wider mid-county population and Canadian customers) was included in Foothills' economic statistics.

This may explain the high number of sales tax collected for "food and beverage stores" (see b., above). If activity for Dodsons Market was included, it was highly inappropriate – its inclusion presents a grossly skewed statistic for the subarea.

2. Because Deming (located *at the extreme western fringe* of the Foothills) was added to the Subarea, it appears that full employment figures for the Mt. Baker School District were included in Foothills numbers. I believe *this seriously "skews" and overstates every statistic that calculates or projects data related to "government employment" for reasons listed below.*

a. Publicly available information reveals that the District employed 249 persons for School Year 2004-2005, and 261 for School Year 2005-2006. The FSP does not specify which school year was used in computing employee counts for year 2005.

b. Only about half of the district's service area is located within the Foothills. Only three of five district schools are located "in" the subarea: Mt. Baker High School and Junior High, and Kendall Elementary. Of these three, as many as half of the Mt. Baker High School, Junior High, and elementary student populations may reside outside of the Foothills. It is impossible to know what number of Foothills students are served by the District, from data presented in the FSP.

c. The FSP does not specify how many District employees (teachers and support staff) actually reside within, or outside, the Foothills. It is highly likely that a substantial proportion of the District's employees live outside the subarea.

d. Further, the FSP does not include any information related to the District's budget (revenue), which is substantial (School Year 2004-2005 \$22,198,642, School Year 2005-2006 \$21,552,514) whether included in whole or proportionate to Foothills economic impact(s).

As presented, any reader of the FSP would presume that all School District economic activity is Foothills-related, but that is far from true. I believe that the Planning Commission and

the County Council should insist on refinement of School District data to include Foothills-specific figures only.

3. As in 2. above, merely because the Nooksack Tribe's offices are located in Deming, at the extreme western fringe of the Foothills:
 - a. It appears that full employment figures related to the Nooksack Tribe (500 jobs, all categorized as "government") were included in Foothills statistics.
 - b. Certainly, not all Nooksack tribal jobs are Foothills jobs, and not all Nooksack employees are tribal members.
 - c. Not all tribal members or tribal employees are Foothills residents.
 - d. The FSP does not include any information, however general, related to the tribe's Foothills (Deming) economic activity, which is substantial. An economic analysis that provides employment data for a sector, but will not address weight of the sector as a part of the overall economy, does not seem complete.

As presented, any reader of the FSP would presume that all Nooksack tribal employment is Foothills-related, but that is far from true. I believe that the Planning Commission and the County Council should insist on refinement of data related to the tribe, and only include information that relates to the Foothills Subarea economy.

4. The economic section says: "Planning issues, as outlined in the previous sections, are largely related to the remoteness of the subarea," without providing any practical data to test or substantiate this assertion. I believe that if the economic analysis were complete it would reveal that many out-of-area employment opportunities are not "remote" to Foothills residents. This all-important issue was not addressed credibly.

Deming is only 12 miles from Bellingham's city limits. Many Foothills residents commute comfortably from as little as 7-10 miles to well-paying jobs in already developed, more commercial areas, north and west – to Sumas, Everson, and Lynden. A commute "within the Foothills" may be just as far (or farther) than a commute elsewhere. (For example, a Deming resident commuting to Glacier or the Ski Area would commute much farther than to a Bellingham job.)

As presented, any reader of the FSP would presume that goals such as EC2 and EC3 are necessary and appropriate, when there is little factual or realistic data in the economic analysis to justify such extensive change.

5. The economic analysis fails to provide any useful information regarding the number of retired persons residing in the Subarea. Retired persons comprise a noteworthy component or sector of the economy of traditionally recreational areas such as "Paradise" and in Glacier.
6. Regarding employment, there is little coherent information or allowance made anywhere to address the number of business owners, sole proprietors, or independent contractors

which may be fully employed within the Foothills, but do not report or pay SUTA (state unemployment tax).

For example, I question this extremely odd claim (that cannot be substantiated) found in the second paragraph below Table 7.1 (page 68),

(regarding employment in the Columbia Valley UGA):

"Private Households (a component of the Retail Trade, Services, and Government category) accounted for 46 percent of employment."

What is the source, more importantly what is the point, of such a strained and incoherent statistic?

7. The economics section refers to "relative" and "median" housing cost(s) in the Foothills on Page 70. It gives a median housing cost in the Foothills of \$163,000 (less than a \$260,500 median cost in the County) for 2006. The Planning Commission and Council need to be aware that, since the FSP was written, the Assessor has increased nearly all Foothills valuations significantly – in most cases from 125-200%. Will this figure be updated? What is the effect of this area-wide revaluation in regard to the economic analysis?

In conclusion to this section, I would like to say that I am willing to share the data that I was able to obtain independently from public sources regarding Foothills economic activity for 2005 with the Planning Commission (for comparison purposes) if a hearing is held regarding this important topic.

III. Internal Consistencies Within The Document

1. There are numerous inconsistencies from section-to-section regarding time frames of reference (basis years). It's difficult-to-impossible to correlate or cross-check data between the Introduction (which includes population), and the Land Use and Economic sections. Is the FSP based on data for Year 2000, Year 2005, Year 2006, or Year 2007?
- a. Section 2 – Land Use, largely refers to Census data for Year 2000. Section 7 – Economics, generally refers to statistics for Year 2005. Numerous statistical forecasts are made for various years in between without specifying factors used -- resulting in stunning and unsubstantiatable results.

For example, Table 7.3 in Economics gives a "2007-low" forecast for "total" Foothills employment of 1,611 and a "2007-high" forecast "total employment" forecast of 1,646 – a figure that is 24%-27% greater than the 1,293 "covered" jobs given in Section 7 (Table 7.1) for 2005. (That's a stunning increase for an area in "economic distress.") To compound the confusion, "Commercial Land Demand" (page 10) in the Land Use section refers to 1390-1420 "commercial jobs" for the same period. What figure(s), if any, are correct?

b. (As mentioned in point 7, above) the economics section refers to "relative" and "median" housing cost(s) in the Foothills on Page 70. It gives a median housing cost in the Foothills of \$163,000 (less than a \$260,500 median cost in the County) for 2006.

The Planning Commission and Council should be aware that since the FSP was written, the Assessor increased nearly all Foothills valuations from 125-200% (and more) for year 2008. Depending on the "issue date" for the FSP, will the "median housing cost" figure be updated appropriately?

As an aside, I ask further – "Do these increased valuations indicate a stagnant or economically distressed Foothills economy?" I certainly don't think so.

3. As previously mentioned, the data contained in "Section 1 – Introduction" refers to statistics for Census Block areas 1, 2, 3, and 7 of Tract 101, as does "Section 2 – Land Use." "Section 7 – Economics" refers to data for Census Block areas 1, 2, 3 and 5 of Tract 101. *This is a central flaw* that fails the "internally consistent" requirement of "Mandatory Elements."

4. Regarding Columbia Valley UGA employment: Section 7 (page 68) states that the "...UGA had 54 covered jobs at 40 establishments, with an average of 1.4 jobs per establishment." Meanwhile, the Land Use section, "Commercial Land Demand" (page 10) states (for a 2005 or a 2007 projection?): "Between 73 and 75 of ... jobs are located in the Columbia Valley urban growth area (UGA). This is a difference of 35%, a significant inconsistency.

Of further note, regarding employment in the Columbia Valley UGA, I (and others) attempted to verify the statistic that there are "40 establishments" (employers) there, but could only identify a few. As previously stated, PDS refuses to provide any detail to substantiate this "fact."

5. Employment statistics and references are presented in different ways within the document.

a. In some cases, the term "covered jobs" is used – defined as jobs reported to/premiums paid to Washington State Employment Security (our state unemployment tax authority, or SUTA). In other cases, the term "commercial jobs" is used. Figures are not substantiated for either type.

b. Regarding "covered jobs," there is no information or allowance made for business owners, sole proprietors, or independent contractors which may be fully employed within the Foothills, but are not enrolled in (do not report or pay) SUTA. Is this a significant omission? If we could see details regarding the source data used for these statistics, we might find out.

c. Employment categories are mixed oddly throughout the document. At the risk of seeming redundant (see II. 6, above) in the second paragraph below Table 7.1 (page 68) one sentence refers to "Private Households (a component of the Retail Trade, Services, and Government category)." How/why would any rational economic analysis categorize "private households" with "retail trade, services, and government"?

I am willing to provide more examples of internal inconsistencies within the document if the Planning Commission elects to conduct a public review of these sections.

IV. Conclusion

I believe that this letter has demonstrated reasonable concern that much of the data provided in the Foothills Subarea Plan is so error-ridden that the document fails to meet the Mandatory Elements requirements of the Growth Management Act.

Future planners, advisory committees, and policy makers will have a difficult time updating the comprehensive plan if this "information" stands, as-written. Without knowing how many of the "facts" it contains were derived, how can change be measured?

Without doubt, **I feel the greatest example of an erroneous "statistic" having caused a cavalcade of strange extrapolations and "planning concepts" is the questionable claim, repeated in various sections (integrated into land use and employment projection tables) is that "66% of Foothills jobs are in the government sector" (a situation so perilous that it must be offset by government-supported job diversification efforts). Where is the list of agencies (and employee count for each) to provide evidence for this argument? If these statistics were reviewed for Foothills specificity (particularly in regard to School District and tribal employment) I believe that the economic analysis would change substantially.** This is a significant matter.

Second only to that example is the repeated assertion that so few jobs are available in the Foothills that – alas! – its residents have little choice but to work afar. Supposedly, this is a problem so great that the government must intervene by increasing zones of population density to "urban levels," subsidize mass transportation, sponsor an industrial park, offer incentives for industrial and housing development projects, and fund numerous civic programs intended to increase the availability "local jobs." I believe an accurate analysis would have revealed nearly the reverse of this Subarea Plan central theme. ***The Foothills historically attracts well-employed workers from more developed areas seeking a home life with rural character – and, this group comprises a significant, stable sector of the Foothills economy.*** Many Foothills residents move here seeking "the American Dream" -- to enjoy raising horses or livestock, perhaps to garden, to hunt and fish, and to enjoy the very "un-urban" character of the area. A large number of Foothills residents can live a rural home life while still enjoying access to urban shopping and services – a freedom of choice that more than offsets the time and expense required to commute to a "day job." The results of the "Questionnaire" revealed the strength of this sector and the truth of this perspective. "Creation of local jobs" was repeatedly ranked LAST among priorities, and "retaining rural character" was always ranked FIRST. From a broader planning perspective, I hope that Whatcom County recognizes the folly of forcing the reverse.

I believe that a corrected, more accurate economics summary and analysis would result in conclusions very different from those found in the Foothills Subarea (Draft) Plan. The Foothills economy that I know is quite stable. It is a unique mix -- rural, residential, and recreational. With these attributes I believe that the Foothills has responded remarkably well to change and challenges in the 35 years that I've lived here. I believe correct data and analysis would reveal that the area has sufficient capacity for modest growth far into the future under the

existing economic growth paradigm, without the need, expense, or risk of intensive and misdirected government intervention.

In conclusion, I urge those in responsible charge, on behalf of the public, to demand nothing less than a corrected, transparent, and substantiatable analysis of the Foothills economy *before* accepting projections, goals, and projects intended to meet the intent and requirements of the Growth Management Act. Please review the document carefully and require possibly substantial re-work. I cannot believe that any reasonable person would accept this document in its current form. As it stands, the FSP has a ring to it of everything *but* accuracy.

Respectfully submitted,



Deborah Ellen Baker
Glacier Resident

Attachment: Copy of PDS Response to Request for Disclosure of Public Records

Copies To: Planning Commissioners
Whatcom County Council Members

WHATCOM COUNTY
Planning & Development Services
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360-676-6907, TTY 800-833-6384
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David Stalheim
Director

J.E. "Sam" Ryan
Assistant Director

April 4, 2008

Deborah Ellen Baker
P.O. Box 5149
Glacier, WA 98244-5149

RE: Request for Disclosure of Public Records

Dear Ms. Baker:

Whatcom County is not providing you with some of the information relating to your public records request. The reasons are explained below.

- *Source data for Table 4 of the ECONorthwest "Foothills Subarea Economic Analysis" dated June 12, 2007.* The source data utilized in this table is confidential data provided by the Washington State Employment Security Department that Whatcom County no longer has in its possession. The school district data utilized in this table (in the government category) was obtained by ECONorthwest and is not in the possession of Whatcom County.
- *Source data for Table 5 of the ECONorthwest "Foothills Subarea Economic Analysis" dated June 12, 2007.* The source data utilized in this table is confidential data provided by the Washington State Employment Security Department that Whatcom County no longer has in its possession. The school district data utilized in this table (in the government category) was obtained by ECONorthwest and is not in the possession of Whatcom County.
- *Source data for Table 8 of the ECONorthwest "Foothills Subarea Economic Analysis" dated June 12, 2007.* The source data utilized in this table is publicly available information that ECONorthwest obtained from the U.S. Census. ECONorthwest did not provide this background information to Whatcom County.

- *Source data for Figure 3 of the ECONorthwest "Foothills Subarea Economic Analysis" dated June 12, 2007. The source data utilized in this table is publicly available information that ECONorthwest obtained from the U.S. Census. ECONorthwest did not provide this background information to Whatcom County.*

The remaining information you requested is attached.

Sincerely,

A handwritten signature in black ink, appearing to read "Martin Blackman", with a long horizontal flourish extending to the right.

Martin Blackman
Long Range Planning Supervisor

Enclosures:

1. "List of Exempt Records" from Whatcom County website, which lists Employment Security Department Records.
2. E-mail from Matt Aamot to Ellen Baker dated 3/13/08, with attached e-mail from Beth Goodman (ECONorthwest) to Matt Aamot dated 3/13/08.
3. ECONorthwest "Foothills Subarea Economic Analysis" dated June 12, 2007 (which is cited as the source of Tables 7.1, 7.2, and 7.3 in the draft Foothills Subarea Plan).

Extended Distribution List
 Comment Letter, June 3, 2008

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