

May 5, 2008

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Whatcom County P&Os

VIA FACSIMILE AND REGULAR MAIL
(360) 738-2525

Whatcom County Planning Department
Attn: David Stalheim
5280 Northwest Drive
Bellingham, WA 98226

Re: Adoption of Foothills Subarea Plan and Related Comprehensive Plan and Zoning Amendments
Our Client: Whatcom County Fire Protection District No. 14 (the "District")

Dear David:

This letter is provided in response to the County's Notice of Determination of Significance and Adoption of Existing Environmental Documents. The District will concur that the proposal that would allow developments such as Balfour Village and Aiki Homes or similar developments, including the urban growth area in the Columbia Valley, would have significant adverse impacts on the environment. The District believes that these impacts were not adequately reviewed under the prior EIS or SEIS.

Accordingly, we would request the opportunity to comment on any scoping of the SEIS and FEIS and the opportunity to comment on a draft supplemental EIS and any documents issued by the County including a draft scoping notice and a draft SEIS. Please provide us with two (2) sets of each documents, one for our client and one for our office. In addition, we would request notice of any upcoming hearing(s) on the proposal before the planning commission and/or any consideration of any proposals by the County Council.

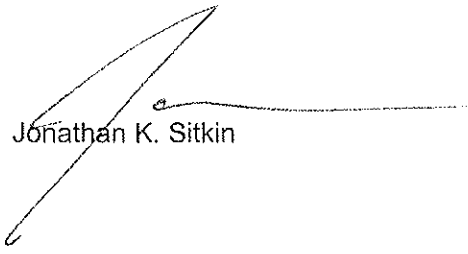
As we have discussed in the past, proposed urban developments within the District will have a significant adverse impact on the existing levels of service from this volunteer fire district to existing residences and businesses in the Columbia Valley. The full impact of such developments must be analyzed, ascertained, and mitigated in the SEPA process.

Moreover, as you are likely aware, RCW 36.78.070(3) requires that the County's Comprehensive Plan include "a capital facilities plan element consisting of: (a) an inventory of existing capital facilities owned by public entities showing locations and capabilities of the capital facilities; (b) a forecast for future needs for such capital facilities; (c) the proposed locations and capacity of the expanded or new capital facilities; (d) at least a six year plan that will finance such capital facilities within projected funding capacities and clearly identify sources of public money for such purposes; and (e) a requirement to reassess the land use element if probable funding falls short of meeting existing needs to ensure that the land use element, capital facilities plan element, and financing plan within the capital facilities plan are coordinated and consistent."

This is a requirement that the County must perform because it must be concluded in the County's Comprehensive Plan. Whatcom County Fire District No. 14 does not have the means to prepare this type of capital facilities plan. This is evidence of its inability to provide an urban level of service called for in the urban areas within Columbia Valley in the Foothill Subarea.

Sincerely,

CHMELIK SITKIN & DAVIS P.S.



Jonathan K. Sitkin

JKS/jhm
cc: Martin Blackman
cc: Client