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Whatcom County

**Minority Members
Foothills Subarea Advisory Committee
P. O. Box 5086
Glacier, WA 98244**

January 8, 2008

David Stalheim, Director
Martin Blackman, Land Use Supervisor-SEPA
Whatcom County Planning and Development
Service Department
5280 Northwest Drive
Bellingham, WA 98226-6907

Re: SEP 07-181; 2007 Draft Foothills Subarea Plan

Dear Mr. Stalheim and Mr. Blackman:

This letter is submitted as comment to the Determination of Significance (DS) and Adoption of Existing Environmental Document. We are pleased that significant adverse impacts on the environment by the proposed Draft Foothills Subarea Plan have been acknowledged, and that environmental scrutiny is being required.

However, we have several concerns.

First, we find it disturbing that the 1996 FEIS is being used as justification for the SEIS rather than a new EIS. All of the 1996 FEIS, the Existing Conditions Report of 1994, and the other components of the Draft EIS, are over a decade old. The information and conclusions are out of date, and should be completely revised and updated to incorporate current information and changes not anticipated by the old documents. In addition, the 1994 Existing Conditions Report does not discuss the Foothills Subarea in enough detail, let alone specific detail, to provide a proper review of the unique geological and ecological aspects of this area of Whatcom County. Therefore, we urge the county to change its requirement from a SEIS to an EIS, to better serve the residents of the Foothills and to better protect the environment of the Foothills.

As an aside, the Final Environmental Impact Statement of 1996 was not presented to the Subarea Plan Advisory Committee. Clearly the committee members should have had that document submitted for information in the preparation of the 2007 Draft Subarea Plan.

Second, we find that the scope of the SEIS/EIS is not broad enough and needs to address the following:

-- Population Projections --

- a. We repeat our position in our Minority Report that the population projections approved by the majority of the advisory committee in the 2007 Draft Subarea Plan are incorrect. The population projections should be completely redone both as to methodology and projections chosen for the next 20 years. We urge the County to perform this task. The results of new population projections need to be utilized in the environmental review process.
- b. Please reference the Minority Report. Please also reference the enclosed supplemental information titled "Analysis by Minority Committee Members of Foothills Subarea Population Projections" along with supporting documents, which we presented previously to the Planning Commission.

- c. Not only are the projections approved by the majority of the advisory committee incorrect, but *Exhibit 2 Whatcom County Comprehensive Plan Goals, Policies, and Text* (to the SEPA Questionnaire, 2007 Draft Foothills Subarea Plan) states on page 2;

"The Columbia Valley was designated as a UGA in 1999. Between 2000 and 2006, the population of the UGA increased by more than 50%."

The Minority Members strongly disagree with the 50% increase assertion for the reasons stated in the enclosed materials previously presented to the Planning Commission. In all likelihood, the population increase was far less than 50% for the simple reason that the starting base Census numbers in the year 2000, as determined by the Subarea Advisory Committee, did not include the entire Census area. Thus, the starting number in the Census material is far less than what the actual population would have been. This analysis was not followed in *Exhibit 2*.

- Water Quantity – The Subarea Plan Advisory Committee unanimously agreed that water quantity was an extremely important area of concern in the Foothills Subarea. With increased populations projected, this aspect must be addressed along with water quality.
- Fish and Wildlife Habitat – Again, due to population increases, impacts on fish and wildlife habitat deserve closer examination. None of the recommendations by the Washington Department of Fish and Wildlife were adopted by the advisory committee and there are not enough conditions in the current plan to provide the necessary protection of fish and wildlife habitat that preserves the natural beauty of the Foothills on which tourism thrives.
- Stormwater Management – There is a need for more storm water management scrutiny. While we have been advised that Whatcom County is currently drafting stormwater management policies, there is a need for this item to be included in the scoping now. The 1988 Foothills Subarea Plan had detailed provisions for storm water management. However, few of these provisions were brought forward to the 2007 Draft Subarea Plan.
- Aquifer Drawdown – With increased population projections, aquifers must be thoroughly examined in light of increased drawdown on the aquifers.. This will affect all water districts, water associations and the water co-ops throughout the Foothills Subarea as well as private wells. It could also affect creeks and rivers in the area that aquifers influence.

Third, we are concerned that the degree of independence required under the RCWs and WACs for an unbiased and impartial EIS with the current structure cannot be met for two reasons. There is a need for outside experts for the water quantity and water quality environmental review. Next, with all due respect and no criticism intended, we find that Matt Aamot was so engaged in the Subarea process that in all likelihood it would not be possible for him or anyone in his position to be unbiased in subsequent coordination of the planning effort for the now required environment review. The County was instrumental in the preparing the agendas, scheduling speakers, gathering materials, and arbitrating legal questions as well as co-authoring the Draft Subarea Plan. Therefore, we urge the County to appoint a new person to coordinate the SEIS/EIS process.

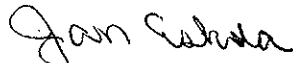
Fourth, we are concerned that having a single hearing for the SEIS/EIS and Subarea Plan would be a disservice to the public with the many issues involved in the Foothills Subarea. People may wish to comment on both the SEIS/EIS and the Draft Subarea Plan. To limit the amount of speaker time will not adequately address both issues. We hope that you will consider separate hearings for the two issues. If this is not possible, then a multiple day process to allow for full public participation should be considered, with full time permitted each speaker to discuss each of these critical issues.

The economic and environmental impacts of the SEPA process deserve Whatcom County Planning's full consideration without regard for stringent time and dollar constraints. This Subarea is the largest geographical area in Whatcom County. It generates a significant portion of the tourism income for

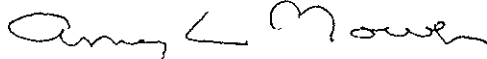
Whatcom County. Therefore, the Foothills Subarea deserves a full EIS, as necessary and warranted as outlined throughout this letter.

We appreciate the opportunity to comment and look forward to your response to our requests.

Sincerely,



Jan Eskola, Member at Large



Amy Mower, Maple Falls Representative



Cynthia Purdy, Deming Representative

cc: Linda Peterson, Planning Division Manager with encl.
✓ Robert Martin, Land Use & Natural Resources Manager with encl.
Matt Aamot, Senior Planner-Long Range Planning
John Everett, Senior Planner-Transportation
Whatcom County Planning Commission
Whatcom County Council