

From: "Holly Koon" <holly@mtbaker.wednet.edu>
To: <rboxx@co.whatcom.wa.us>
Date: 1/10/2008 11:51 PM
Subject: cc of comments on SEPA determination and SEIS for the 2007 Draft Foothills Sub-Area Plan

From: Holly Koon

7437 Wheeler Road
Maple Falls, WA 98266

To: David Stalheim, Director
Whatcom County PDS
NW Annex, 5280 Northwest Drive
Bellingham, WA 98226

Re: SEPA determination and SEIS for the 2007 Draft Foothills Sub-Area Plan

Date 1/10/08

Dear Mr. Stalheim et al:

I live in Kendall. Several weeks ago I went to pick up my son from Kendall Elementary School at the end of the school day. When exiting the school parking lot, traffic on the Kendall-Sumas Road forced me to wait what seemed an interminable amount of time to execute a left turn. While I sat there I was imagining what this same act might be like just several years from now if the THOUSANDS of additional car trips envisioned by the Draft Sub-Area plan are promoted on this same stretch of country road each day.

Then I thought about what that same growth could mean for my water supply. Because I am on a well that draws from the same aquifer recharge source as the Columbia valley, I worried about the future QUANTITY of my water as well as the quality of my water downstream from all that planned growth. Because of the critical areas and the permeable soils surrounding the fragile system that is Kendall Creek, I worried about the salmon, trout, and migratory birds that live there and in the creek system that runs through my property and feeds into Kendall

Creek. I worried about the inevitable light and noise pollution that will degrade the quality of the country night all of us who live here value so much. I worried about the impact all those cars would have on the air quality in this narrow valley and a host of other environmental and land use issues. Suddenly, traffic was the very least of my worries even if it is the most obvious issue to talk about because it involves the most straightforward political solutions to "mitigate".

You can imagine my initial delight and satisfaction when I read in the Bellingham Herald that a Determination of Significance had been issued for the Draft Foothills Sub-Area Plan (DFSP). Finally! I thought; something in this process that makes sense to those of us who just want to live and work in the country without trying to make a bunch of money off of developing away our future. I whispered a heart-felt thanks to you for acknowledging that important considerations exist beyond the pocketbooks of a few or the dream that we can just grow our way out of the problems that already exist in this area. Then I reread the announcement and realized that a supplemental EIS was going to be required instead of a full EIS and my heart sank. So much has changed in the foothills in the past 10 years that only a full EIS could possibly allow a comprehensive look at the actual impacts of growth. I would like to request that you seriously consider requiring a full EIS for the Draft Sub-Area plan or at the very least, expand the scope of the SEIS to include fish, water quantity as well as quality, air quality, and the impact on the natural resources of the area both in terms of maintaining the future ability to extract them and the potential aesthetic impacts to our quality of life.

Here are just a few of the things that have changed since the last EIS was completed for the sub-area and which make it essential that you do not depend on past decisions to inform present day mitigation measures:

* The part of the DFSP that pertains to the Columbia Valley area is now completely enmeshed with the plans of local developers, (the new STC proposed in the DFSP and the site proposed for the East county Regional Resource Center are identical to Aiki Homes' Balfour Village proposal, and the developer was a vocal and obviously successful presence at virtually every FSP committee meeting), who are themselves awaiting a determination on whether or not they will be required to do an EIS for their proposed development. If only a supplemental EIS is required now, and if the focus on the Columbia Valley portion of that SEIS is diluted by the fact that the SEIS is for the entire foothills, what will happen when the time comes to make a determination related to Balfour Village? Will the developer be able to make a case that an EIS process has already been completed (How lucky for the developer that it is happening at tax-payer expense) and that more restrictive requirements are simply an undo burden on the development? This cannot be allowed to happen for the additional items stated below.

* We know a lot more about how important the Kendall Creek system is to fish, migratory birds, and other wildlife than we did 10 years ago. Two of the Salmonids in the Nooksack watershed have recently been listed as threatened or endangered and the hatchery on Kendall Creek is a major part of the recovery effort for the endangered Chinook salmon. In addition, the Kendall Creek system has recently been deemed important enough to fish recovery efforts by the state and the tribe, that over \$100,000 of grant monies have been spent in the past few years on fish surveys, habitat restoration, and impact mitigation just on the section of Kendall Creek abutting Wheeler Road and the two small tributary streams that flow into the creek at that point. Professionals from The Department of Fish and Wildlife submitted recommendations to the Sub-Area Planning Committee but after careful examination I cannot find a single one of those recommendations reflected in the DFSP.

* We have an elementary school that houses 600+ children and adults "downstream" (water, air, traffic) from all of the potential environmental impacts in the Columbia Valley as well as the additional population increases that have occurred in real time. There are already a lot more people living and recreating here than there were 10 years ago.

* We know our weather patterns are changing. Even if we knew it 10 years ago, we did not recognize the potential political significance of this fact because it appears to be happening much more quickly and unpredictably than initially stated. In today's world, we cannot plan for growth without doing our best to at least consider the potential impacts; especially when all current residents depend on an aquifer of unknown carrying capacity, in an area with highly permeable soils of which the capacity to recharge and provide sufficient filtration of impurities is poorly understood. How can we say we did our best to plan for an unpredictable future if we aren't even willing to be sure we understand what the current limitations are??

In the Columbia Valley / Kendall area, we are already living with so many failed decisions made by past policy makers. I do not believe these were bad people, or unintelligent people. I think they just made a series of decisions one-at-a-time without ever adding up the cumulative impacts in the long-range planning process. I saw the same thing happen during the drafting of the DFSP. Somehow a series of well-intentioned small decisions by the majority of the committee members added together to create a plan that failed the central, guiding mandate from an overwhelming majority of the citizens who actually took part in the official process: to maintain the rural character of the foothills. I know that the committee heard that mandate. But, from the beginning the majority assumed that it did not apply to the Columbia Valley. Instead of evaluating the logic of a past decision to place a UGA in a non-urban area, they simply went ahead adding to the potential disaster; incremental decision by incremental decision not seeing the

forest for the trees. I am so afraid that only requiring a SEIS will result in just another disjointed and fractured process that still does not provide an accurate picture of the comprehensive impacts of our actions.

Mr. Stalheim et al, please. Right now at this moment in history the process is on your doorstep with all of its historical baggage. You, as the policy makers, have a real opportunity to require that we stop just marching forward step by step and instead pause to get a perspective on the entire big picture of what we are doing. This opportunity will never come again with the same potential for shaping the future.

As you make your decision whether to require a full EIS (or at least expand the scope of the SEIS) or go with the SEIS as planned, you may find yourself concerned about erring on one side of the issue or the other. Please err on the side of gaining as much knowledge as possible about the future impacts we leave to our children. Please err on the side of finally seeking a comprehensive look at the cumulative impacts of all the little decisions. Please do something almost unheard of and err on the side of the darkest nights with the brightest stars, the cleanest streams full of fish, and my kid who just wants to grow up and "live in the country".

Sincerely,

Holly Koon

Kendall Resident

Ph# 599-1730

Email: holly@mtbaker.wednet.edu

Cc Martin Blackman, Members of the WCPC