

From: Heather Koon Swanson
7525 Wheeler Rd.
Maple Falls, WA 98266

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

Re: 2007 Draft Foothills Sub-area Plan
And
SEPA determination and SEIS

Date: 1/8/08

Dear Mr. Stalheim, et al:

Kudos to Whatcom County PDS for the DS you issued regarding the 2007 Draft Foothills Sub-area Plan (DFSP). The plan is seriously flawed regarding population projections and proposed changes to the Columbia Valley UGA, and its section on the environment is inadequate. In fact, I think the DFSP warrants a comprehensive review, and I urge you either to change the requirement of an SEIS to that of an EIS, or to broaden your scoping list to include:

- **Fish**, including recently listed salmonids and recognition of the Kendall Hatchery as the cornerstone of Nooksack watershed recovery efforts for the endangered Chinook salmon.
- **Natural resources**, both scenic and extractive.
- **Water**, quality AND quantity
- **Air**, including local air quality and global warming issues
- **Earth**, including critical areas, permeable soils and earthquake threat.

Considering the 2007 DSFP itself, I have two primary concerns: Population projections and proposed changes to the UGA. The population projection adopted by the DFSP is higher than the professional recommendation of the Eco Northwest consultants. I would argue for using either the lowest Eco Northwest projection or adopting Professor John McLaughlin's methodology as described in the DFSP's minority report.

Regarding the UGA, I believe the DFSP is way off base on nearly all of its assumptions, and that the plan's vision for the future is driven by the wishful thinking of would-be developers. Please consider the following points:

- 1.) The population density of the UGA is an anomaly caused by allowing the extensive Paradise and Peaceful Valley developments to convert from seasonal recreational to year-round use. The consequences of this decision haunt us today in the form of mostly low-income housing with aging septic

systems on postage stamp-sized lots in the middle of a scenic rural area with narrow, winding country roads. The "UGA", by definition, is not. There is no urban core around which to grow, and no demonstrated capability to support urban and industrial components in the foreseeable future. This area is best described as a LAMIRD, and should be formally designated as such. Rather than trying to fix the ongoing problems of this anomalous rural density with a contrived "small town", the residents of Columbia Valley would better be served by bringing public services and safety measures into concurrency with existing conditions before allowing additional growth.

- 2.) The DFSP's proposed addition of an STC in the UGA is in direct conflict with the current mandate to fill in the Kendall STC before increasing commercial zoning. There has been no demonstrated need for this new STC, and until basic public services and safety measures are extended to the existing developments the area will remain a hostile place for pedestrians. If residents have to drive a private vehicle to the new STC anyway, it will not be much of a lifestyle improvement from driving on in to Kendall.

This issue of pedestrian safety applies also to the location of the East County Regional Resource Center. The County council based its decision to build the center in the UGA based on their assumption that the area is "walkable". It is not. There is in fact a long history of community centers and family-oriented recreation facilities in the UGA closing from lack of use. Because of this pattern and the developments' lack of safe pedestrian access, the success of the regional resource center depends upon it being located in the existing and more accessible STC at the Kendall junction.

- 3.) The DFSP proposes 120 acres of zoned light industrial land (80 net acres). This is nearly SIX TIMES more industrial land than Studio Cascades' highest recommended amount. Where is even a minimally demonstrated need for this? Who is going to move their business to this out-of-the-way UGA that is really a LAMIRD? Furthermore, 40 acres of this proposed industrial land is currently designated RF. Converting RF to LI, especially without proof of need, is irresponsible and short-sighted given the importance of natural resources to the local economy and to the County as a whole.
- 4.) The existence and development of the UGA seems to be permeated on many levels by the plans of local developers; from the proposed STC on the footprint of Aiki's commercial plan to the siting of the resource center on land gifted to the County by Aiki, to the study of traffic and public safety, the Balfour Village development proposal seems to have insinuated itself into the official planning process. I am very concerned that those who support this development have been defining the conversation throughout the Foothills Sub-area planning process, and that this one proposed project is driving the continued existence and expansion of the UGA. It is my hope

that the SEPA process for the 2007 DFSP will be undertaken in a truly impartial and apolitical manner, and that the alternatives discussed will include the assumption that Balfour Village is NOT a done deal.

In closing, I would like to suggest some options for discussion during the SEPA review and implementation:

- **Redesignate the Columbia Valley UGA as a LAMIRD**
- **Adopt professor Mclaughlin's population projection method, or use Eco Northwest's low number**
- **Adopt the recommendations of the 2007 DFSP's minority report**

Thank you for considering these comments.

Sincerely,



Heather Koon Swanson

Cc: Martin Blackman
Matt Aamot
Ken Mann