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LONG RANGE
PLANNING DIVISION

Dear David Stalheim, Martin Blackman, and members of the Whatcom County Planning Commission:

I am writing as a community member who lives, works, and is raising a family in Kendall. My comments are directed first toward the Sub Area Plan crafted by the majority members of the committee, which I am critical of, and secondly toward the county's determination of significance and the requirement of an SEIS (Supplemental Environmental Impact Statement) which I would like to see upgraded to a full EIS.

I will begin by stating my appreciation for the time and effort the Sub Area Planning Group invested in the Sub Area Plan. In the interest of civility amongst those who disagree, I want to recognize the effort of those members as individuals who took considerable time to serve.

As a community member in occasional attendance at the Sub Area Meetings, and a participant in both the Community Workshops and a respondent to the Questionnaire, I understand the clear mandate from a substantial portion of the foothills community is to maintain the rural character of this area. Rural character was not an assignment to be achieved as part of a mission to encourage growth, but rather a guiding principal and central statement from the visioning process the county commissioned through Studio Cascade. In reading the plan, I see much evidence of hard work and good intentions evidenced by individual components, but believe the plan as a whole failed the central assignment from the community.

My impression from following the process, attending several meetings, talking with my representatives on the committee and now reading the results in the plan, is this outcome occurred in a series of incremental steps that systematically placed the vision of a growing Columbia Valley Development ahead of the qualities that make the foothills the location so many of us want to spend the rest of our lives in. Let me give examples.

Despite evidence of greater historical accuracy, the majority of the Sub Area Committee first ignored the lower population projections of Prof. John McLaughlin of WWU, and then in several examples (pointed out in an Analysis by the Minority Committee Members of Foothills Sub area Population Projections), voted to exceed the mid-level population projections from EcoNorthwest – the professional firm hired by Studio Cascades to conduct the population analysis for the committee. If the central charge from the community was to maintain our rural quality, why would the process start by selecting a more aggressive population model than the bulk of the solicited professional opinion recommended?

Carrying capacity: My understanding is there was no analysis by the committee of the carrying capacity of the aquifer over time or the ability of the highly permeable soils of the Columbia Valley to recharge and provide sufficient filtration of impurities. Many of us came to this community because it has been the kind of place where the water runs clean and the fish live in it. If you want to pick one unified vision of what the northwest means to a majority of current and past residents, I offer you that one. In these days of global warming and focus upon water as a limited and precious resource, how dare a planning process not specifically emphasize and study in detail the impacts of a large scale development on the aquifer we live on?

Clustering: If the Sub Area Plan is to maintain the rural character of the area, it is not possible to propose both a large Urban Growth Area as well as “clusters” of residential development in the rest of the area. The point of development occurring in small clusters is to create a decentralized pattern of population distribution with large areas of open space. With proper thought and provisions, this could describe one vision of “rural.” When you plunk a new center of urban development in addition to clusters of small homes everywhere, it both misses the point and strains the credibility of the plan’s commitment to rural character. I understand the difficulty of choosing where to encourage and limit development, but it does not excuse the committee or the county from the hard choice of making selections that preserve the character of the area as overwhelmingly supported in the community visioning process. The committee can’t have it both ways.

Finally, let me say this – the business plan for the Urban Growth Area in Columbia Valley comes at a time when the US dollar is falling against Canadian Currency, the price of gasoline and other transportation is rising, and our immediate / local community’s economy is far from providing family wage income for the population we have (let alone the high side estimates this committee supported for the future). In addition, the vision of the population center the committee proposed is not consistent with historical trends that have attracted people to driving this far out in the county (i.e. small lots in Columbia Valley were extremely cheap or they wanted to live in a *rural* setting - generally on a larger parcel of land). Please look at the history of poorly conceived development and “Community/Recreation Centers” in the Columbia Valley and consider the elements of this plan that continue a tradition of folly.

With regard to proposed light industrial land and a business center of sorts, I see no evidence the vision of development the majority report supports has a solid business plan based upon either specific proposals or current economic and transportation realities. Simply stated, the vision of retail and light industrial development being planned by proponents is more than any current or clearly projected realities would support in this out of the way (of any transportation corridor) area. For example, I heard the Studio Cascade Consultant report at the December County Planning Commission meeting he would usually consider a population threshold of about 10,000 residents desirable for this type of business center development. In consideration of this figure in combination with the economic and transportation realities of our community, the current plan has managed to be both too much, and not enough.

In order to correct these mistakes and others, I ask you to begin by **supporting the Minority Report from the Sub Area Plan Committee**. My concerns and recommendations are supported by the provisions of this report. Secondly, **please address the Sub Area Plan at the level of a full EIS**. The scale, history, environmental and community impacts make the greater level of scrutiny necessary. Finally, I ask that you **take the Columbia Valley out of the UGA Designation**. Continuing the mistakes of an ill conceived development 30 years ago is not a method to chart a better course for the future. As I understand it, a better designation would be LAMIRD, or Limited Area of More Intense Rural Development.

In addition and particular, please consider the following points:

- **Please adopt the population projections of Prof. John McLaughlin** to guide planning for this area.
- **Address water quantity as well as quality** in the EIS.
- **Address long term impacts associated with concentrated development upon alluvial fans** (as currently proposed within the UGA boundaries).
- **Include current recommendations from the WA Dept of Fish and Wildlife** in a designated section of the plan related to the Environment.
- **There is new research in the past year that clearly shows there has been more than one significant earthquake in the immediate area of Kendall and Maple Falls.** The significance of this threat should receive consideration before large scale new development is planned in areas that may receive geologic activity from up-slope or below.

Thank you for this opportunity to comment.

Sincerely,

Max Duncan
7537 Wheeler Rd
Maple Falls, WA. (Kendall)

Community Affiliations:

Teacher – Kendall Elementary School
Past member Mt Baker School District Facilities Planning Committee
Mt Baker Ski Area Volunteer Ski Patrol
Kendal Elementary PTO member.
Parent in the Mt Baker School District.
Kendall Resident for 17 years.