

North Cascades Audubon Society

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MAY 21 2008

LONG RANGE
PLANNING DIVISION

May 19, 2008

Board of Directors

Joe Meche
President

David Stalheim
Planning Director, Whatcom County
5280 Northwest Drive.
Bellingham, WA 98226

Paul Woodcock
Vice President

Re: Draft Whatcom County Foothills Subarea Plan SEIS

Lila Emmer
Secretary

Mr. Stalheim-

In the 1970's, several high density "recreational" developments were platted in Whatcom County (e.g. Sudden Valley, Paradise Lakes, Snowline, Mt Baker Rim, etc). I think it is appropriate to say that nearly all of them were inappropriately sited, and county planning has had the job of dealing with their paths ever since. The Foothills Subarea Plan deals in large part with an area currently containing a high density UGA resulting in part from the Paradise Lakes development.

Diane Birsner
Treasurer

The foothills subarea, situated between Sumas Mt and the Mt Baker foothills, borders on critical wildlife habitat. It is in the headwater area for Kendall Creek and other lesser known Nooksack tributaries, and borders on the area designated as the core area for the North Cascades Elk herd.

Rae Edwards

It is surrounded by commercial and rural forest land – areas which must be maintained in as much of their forested state as possible for water quality, and wildlife habitat reasons.

Chris Smith

Additionally, this area currently has no significant utility or transportation infrastructure.

Tom Pratum

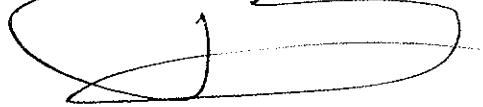
For this reason, we feel that any further expansion of development potential for the area must be approached with extreme caution. Our concerns, which we hope will be addressed in the SEIS, include the following:

Steve Irving

- Will critical species, among which are Coho Salmon and Trumpeter Swans, be sufficiently protected under the plan? The latter species is likely to become increasingly dependent on inland areas such as this as their more traditional estuarine areas are developed.
- Will surface and groundwater resources be sufficiently protected under the plan? Will there be impervious surface limitations to all succeeding development in the area? Will there be forest canopy cover requirements?
- Will neighboring forested areas with RF zoning on Sumas and Red Mt will be cleared and converted to some type of low-density residential use if we further codify existing development potential in the area? This loss of forest cover would adversely affect both water quality and wildlife habitat.
- Has Whatcom County sufficiently accounted for transportation impacts? The main transportation access to this area will come via the Mt Baker Highway. The county plan uses limited data to make critical predictions that we may not have the opportunity to revisit in the future. For that reason, the local non-profit Foothills Friends paid to have a more thorough study done (the Tilghman report). This study comes to conclusions that differ greatly from the current plan regarding the impact of allowing significant population increase in the area. We urge you to incorporate this report, and the data contained therein, into final consideration of the environmental impacts of the Foothills subarea plan.

Thank you for the opportunity to comment, and for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to be "Tom Pratum", written over a horizontal line. The signature is enclosed within a large, hand-drawn oval shape.

Tom Pratum
Conservation Co-Chair, North Cascades Audubon Society

cc: Martin Blackman
Matt Aamot
Whatcom County Planning Commission