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PLANNING DIVISION

Whatcom County Planning Commission
5280 Northwest Road
Bellingham, WA 98226

December 29, 2007

RE: Draft Foothills Subarea plan Advisory Committee Draft

To the Chairman and Honorable Commissioners

Having read the Foothills Subarea Plan and listened to the presentation by staff of the draft's highlights to the Planning Commission, I'd suggest to the Commissioner that the draft plan be rejected on the basis of it's numerous errors, omissions, oversights and lack of proper consideration of impacts.

In general, the draft plan is not one that benefits the foothills long established communities; rather it concentrates on the aberration in the Columbia Valley. The lack of consideration and inclusion of any reasonable discussion of the communities outside the Columbia Valley is peculiar and suggests a bias on the part of the Advisory Committee, to promote the Columbia Valley interest and development above and to the detriment of the rest of the Foothills. Testimony to this bias is the exclusion from the planning document, by the advisory committee, of the mailed questionnaire and the well-considered response of others and myself to our "vision" for the foothills.

The Columbia Valleys history of development is relatively recent ¹and unusual in that it's designation as an urban growth area (UGA) is without precedent in Whatcom County. The long platting of "Paradise", "Campers Paradise" and "Peaceful Valley" was done prior to any significant environment review or impact analysis. The development in those areas has crept in and dramatically changed from the proposed original intent. Thus its impact on the County at large has grown without due consideration of cost or affect on services, be they schools, transportation, law enforcement, fire protection, medical care or social services. The draft plan continues this omission and neither directly nor indirectly provides a formula or outline for addressing these very real countywide budget short falls for providing essential services. Delivery of law enforcement and fire/medical service, specifically to the (once) recreational developments in the Columbia valley,

¹ The last remaining structures built in 1914, to house the workers of the Olympic Portland Cement Quarry (Balfour, Guthrie & Co), where raised in the 1940's

is completely out of relation to the rest of the foothills. Like wise the Mt Baker School District has struggled to meet the demands placed on it by the disadvantaged student population residing in the Columbia Valley.

In the early 1970's, the Columbia Valley was platted and developed with small lots for cabins and trailers marketed to the lower mainland of British Columbia as affordable recreation sites for mid income families. At that time, the Canadian dollar was at par and families with modest incomes could afford the few thousand dollars it took to get a trailer on a lot in "Paradise". As the economy changed and the Canadian dollar went to less than .70 cents US, the once affordable nature of the developments was no longer within the means of the typical owner. It was at this time that the change from owner occupied to rental began. As the homes were small and the US dollar was high, relatively low rents (in US dollars) provided the Canadian owners somewhat of a windfall. This process was accelerated with the placement (dumping) of Low-income families from various counties in western Washington via HUD grants in the rental trailers and cabins. With the low-income nature of the community, crime and reliance on EMS for primary health care became the norm. It remains so today with District 14 Kendall responding to nearly 400 calls, in 2007, to the Columbia Valley developments alone. The draft plan addresses none of these impacts for either the current or proposed developments. This is a very serious omission on the part of the Advisory committee and the consultant, Studio Cascade, Inc. This omission is a huge liability on Whatcom County and one that it can ill afford to assume.

How the Columbia Valley came by its status as an urban growth area through this unintended evolutionary process is a mystery. There is nothing in the Columbia Valley UGA that would typically be associated with an "Urban Area". There were/are no services, no store, gas station, school, firehouse, library etc. These typical infrastructures existed in the surrounding historic communities but not in the Columbia Valley. The designation of UGA should be removed and the area returned to its former "recreational" use, which is the standard for all other similar developments in the foothills. Adding high-density "affordable" housing will only add to the problems of delivering service and do absolutely nothing to avert the looming crisis.

Population projections are also a curious point in the advisory draft. Statistically the high projections in the report are not supportable, as discussed in the minority report. Use of the highest projections only adds to

the bias of the drafts recommendation and forms a sort of self-fulfilling forecast. Use of an inflated population growth factor distorts all the assumptions in the draft and calls into question the validity of the entire document. Furthermore to not temper the growth figure with the reality of current fuel costs, transportation and increases in construction material is naive at best. These cost will have a major impact on both housing, commercial development and overall population patterns through the county. These limiting factors were not considered in the draft but (as any reasonable person would) should be taken into consideration. Likewise the idea that commercial ventures will find a geographically isolated valley with limited transportation access desirable for locating operations providing family wage jobs (which are undefined in the report) is also a very subjective conclusion not supported by the documentation. There are examples of numerous trade zones, and much more ideally suited commercial sites through out the county (i.e. Sumas, Everson, Ferndale) that are accessible, affordable, and still under utilized.

Another weakness of the draft plan is the assumption that the County, State and Federal Government agencies will be able to provide on going funding for services that are not otherwise self-sustaining. As a 30 + year resident of the foothills I've seen nearly all our services withdrawn or downsized with reduced hours of operation and smaller budgets. It is a fact that government services are shrinking when supported by general funds. Placing publicly supported health clinics, adult educational services, specialized transportation, food banks and similar support to a needy population in a remote location means that these same services will have to be withheld or limited at some other locality.

The conclusion of the report that the proposed developments in the Columbia Valley will not alter the rural nature of the foothills seems oxymoronic to any reasonable person. The logic that by encouraging further development with a Town center, commercial, industrial property and supporting infrastructure will somehow blend into the existing use and character of the community is a seriously questionable conclusion. I find little to support in the Advisory Committee's draft plan. While the report proclaims to "*integrate the population forecasts (invalid as they may be) community vision (the survey results for which were excluded from the report) land use plans and a range of public policy direction into a single comprehensive guide for the foothills future*" it falls far short of that goal and is in fact a disservice to the community and the County as a whole. It is not'

as stated, "*a compendium of the community's voice*". It is rather a one sided, biased and highly subjective vision of how one poorly considered planning decision from 30 years ago will be allowed to dominate and overwhelm the services, resources and very nature of the entire Foothills community.

As an alternative I'd propose the following for consideration by the commission.

1. Remove the UGA designation (returning to the recreational) and restrict any further development in the Columbia Valley to R5. with allowance for resumption of historic quarry, agricultural and forestry activity.
2. Allow in home business (light commercial) activity in the R5 with modified conditional use.
3. Move forward with the Kendall Small town designation with limited commercial development to support the existing Columbia Valley and upper valley (Maple Falls & Glacier) residents.
4. Require a more realistic population estimate to be used in future zoning
5. Leave the balance of the recommendations for Communities outside the Columbia Valley as outlined in the draft.

Thank you for this opportunity to comment,

Sincerely
Benjamin E Thompson
9308 Mt Baker Hwy
Glacier, WA 98244

Past and Current affiliations

Past member Mt Baker Schools Facilities planning Group
Past President Mt Baker Foothills Chamber of Commerce
Member Whatcom County EMS planning group
Past Commissioner Fire District 19
Current Chief Glacier Fire & Rescue, with 30 years of service.
Chairman Cascade Recreational planning group (now closed)
Foothills resident since 1975