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LONG RANGE
PLANNING DIVISION



WHATCOM COUNTY FIRE PROTECTION DISTRICT NO. 14

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September 13, 2008

Whatcom County Planning Department
Attn: David Stalheim
5280 Northwest Drive
Bellingham, WA 98226

Dear Mr. Stalheim,

The Commissioners of Whatcom County Fire Protection District 14 are concerned about our ability to continue to provide fire and EMS protection to the citizens it serves should a development resulting in the addition of 3,887 residents be added to our community as projected by the S.E.I.S.

District 14 suffers from the same decline in volunteer firefighter recruitment being experienced across the nation. Our department consists of three stations with a total of 58 members, down from 65 in 2003. Retirement with 20 plus years of service is an option for 21 of these volunteers. We are looking at an aging group of firefighters with new recruitment at the lowest level since the stations have been operating. One of our concerns is the added work load due to the increase in responses would cause too many to just "throw in the towel".

A shortage of volunteers would result in the need to provide a paid staff. Housing and equipping a paid staff would require an investment of approximately \$710,000 (\$250k engine, \$180k tender, \$80k aid car, \$200k modular living quarters). Land has been set aside adjoining the existing Kendall Fire Station. A more ideal location would be central to the Growth area requiring even more money to buy land. A mitigation fee to address this sum would be based on the projected number of homes to be built. Hiring six paid staff would cost approximately \$500k annually including salary and benefits. The property tax generated by the initial 280 homes the developer is proposing to build would do little to augment the \$322,408 we are currently allowed to collect annually. Taxable

revenue would fall far short of the needed capital resulting in tax rate increases to be paid by existing residents to maintain the current level of service.

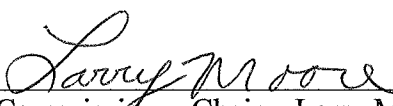
District 14 does not feel Alternative #1 grasps the severity of the situation at Kendall and fails to recognize the need and expense to existing homeowners of building a new station, supplying equipment and the staff to operate. The volunteers at Kendall are responding to almost twice as many calls as they did in 2003. Welcome station has seen their call load increase by one half in the same time frame. With Kendall responding to a call, a second tone out goes out to the closest station, in this case Welcome. The increased distance adds an additional 15 minutes to the response time, a negative response also not addressed by the S.E.I.S. since existing citizens would see a decrease in service level.

A Capital Facilities Plan analysis is being conducted by District 14, at our expense (approximately \$29,000), to determine what facilities, equipment and staffing changes need to be made to maintain NFPA standards. Generating revenue in a decidedly rural community to pay for needed changes would place undue hardship on current residents.

Alternative #2 could possibly result in the need to expand Kendall's existing station or build a new fire station to accommodate sleepers. On the other hand, growth may continue at a slow enough rate District 14 may be able to meet increased call loads through the recruitment of volunteers.

Alternative #3 places the least amount of growth pressure on District 14. We would continue to provide service at a rural level as opposed to an urban area. District Commissioners would continue to seek a solution to increased call load level based on the increased number of low income residents and their inability to transport themselves to medical attention.

Continued growth of any magnitude may place District 14 in a situation where it cannot keep up with the call volume with volunteers alone. It does not have staff to provide a level of service with volunteers alone. A reduction in the level of service to existing residents, in order to provide service to a large development, is a significant adverse impact and must be mitigated under SEPA. District 14 does not feel this most recent S.E.I.S. adequately addresses the solution of these issues. As part of the SEPA analysis, we would like to see the impacts of the proposal on the built environment (RCW 43.21.110). This necessarily means the direct, indirect and cumulative impacts of the proposal on the ability of the existing residents to continue to receive fire and emergency response services at current levels, as well as at the higher levels of service as may be defined by the County's comprehensive plan and national standards. Such detailed analysis for the proposal or any of the alternatives is not adequately provided in the S.E.I.S. as District 14 moves from a rural Fire District to an urban Fire District.



Commissioner Chair---Larry Moore