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LONG RANGE  
PLANNING DIVISION

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Gentlemen,

I oppose the approval of the Draft Sub Area Plan as written (i.e. Alternative 1) for a wide range of issues but would like to comment specifically on the cost of Mitigation Measures listed in the Draft SEIS.

Cost of Mitigation will greatly impact the taxpayers of Whatcom County. There is no way the proposed developments in Columbia Valley will pay their fair share of Mitigation Costs required to support the growth. Neither will the proposed developments in Columbia Valley improve the quality of life or rural character for people in the Mount Baker Foothills.

On Page 11 of the Draft Supplemental Environmental Impact Statement under the heading "Effectiveness of Mitigation" It states in part "Appropriation of adequate financial and human resources would be needed in order to ensure the effectiveness of the Mitigation Measures". Where is the money going to come from to pay these Mitigation Costs? Can we expect the developers that will benefit from this Alternative 1 to pay for these measures? Given the current state of concurrency rules and impact fees, **I say no**. That means Whatcom County and East County Residents in particular have to pay out of their own pockets and budgets for these mitigation costs. Will the rest of Whatcom County, especially East County Residents benefit at all from increased population densities in Columbia Valley? I say no.

I have compared the estimated costs and impacts of Mitigation addressed in the Draft SEIS between Alternative 1 and Alternative 3. The County has not included such an itemization or, such a comparison in the SEIS which definitely needs to be done before any decision is made by the county as to choice of alternative. I provide a conceptual estimate of cost associated with these Mitigation Measures for your review and consideration.

- Public Schools, Transportation, Transportation, Fire and Emergency Services, a New Town Park, and Law Enforcement, are all referenced with Mitigation Measures spelled out. The cost for accepting the Sub Area Plan Alternative 1 over and above the Mitigation Measures in the LAMAIRD Alternative 3 likely will exceed 100 million dollars over a 20 year cycle from start of project through Capital Expenditures and Cost of Operations. I have added the cost of new school operations contemplated in Alternative 1 (since the SEIS assumes, appallingly that the school would not be constructed for 20 years). Further addressed in the SEIS are Mitigation Measures for Ground Water Quantity, Ground Water Quality, Sewer, Surface Water Quantity, Surface Water Quality and Storm Water. How these Measures will be funded as well as the overall impacts are not addressed to the appropriate level of detail in the SEIS to estimate cost beyond user fees. I believe the Taxpayers will be burdened for a portion of these costs as well, which are not included in the figures listed above.
- Other potential Mitigation Measures are not spelled out in the SEIS including Subsidized Bus Service, Improvements to Kendall Road State Highway 547, Stream Restoration and increased

financial burdens to Whatcom County Planning and Building and Codes, which again are not included in the figures above.

I strongly recommend that Whatcom County accept the LAMAIRD Alternative 3 and save the taxpayers of Whatcom County and specifically the East County the burden of cost for the benefit of development that is detrimental to our rural character and quality of life.

Following are Tables with Conceptual Estimates Identifying the Mitigation Measures contained in the Draft SEIS:

<b>Table 1 - Mitigation - Transportation</b>	Description	Capital Costs	20 Year Maintenance / Operations Costs
Location	Capital Improvements by 2014 & 2022	Capital Costs	20 Year Maintenance / Operations Costs
SR 542 and Kendall Road	Traffic Signal or Higher Cost Round-a-Bout From WSDOT Traffic Signal = \$450,000 + 25% Inflation and \$8,000 per year maintenance	\$ 450,000	\$ 160,000
South Pass Road and Nooksak Rd.	Separate Southbound right and left hand turning lanes.	\$ 125,000	\$ 40,000
Net Cost for Alternate 1 Over and Above Alternative 3	\$ 775,000	\$ 575,000	\$ 200,000

<b>Table 2 - Mitigation - Public Schools</b>	Description	Capital Costs	20 Year Maintenance / Operations Costs
Capital Improvements by 2027			
Alternative 1 Capital Cost	New Elementary in Columbia Valley and Seven New Middle School Permanent Classrooms + 41 Additional Staff. Cost for Construction Average \$18,000 per student, National Clearinghouse for Educational Facilities September, 2005 + 25% inflation adjustment	\$ 14,062,781	
Alternative 1 Operations Cost	Alternate 1 - 675 Additional Students Cost Basis WA State PTA Report 3/25/2004 Barbara A Billingham \$7,296. Per year per student + 20 year adjustment = 15% inflation adjustment over 20 years		\$ 123,120,000
TOTAL SCHOOL MITIGATION FOR ALTERNATIVE 1	\$ 137,182,781	\$ 14,062,781	\$ 123,120,000
Alternative 3 Capital Cost	Five Permanent Classrooms and Five Portable Classrooms + 12 Additional Staff Portable Classroom Adjustment, Cost per Student \$12,000	\$ 3,525,000	
Alternative 3 Operations Cost	Alternate 3 - 235 Additional Students at Same Operating Cost per Student as Option 1		\$ 42,864,000
TOTAL SCHOOL MITIGATION FOR ALTERNATIVE 3	\$ 46,389,000	\$ 3,525,000	\$ 42,864,000
Net Cost for Alternate 1 Over and Above Alternative 3	\$ 90,793,781	\$ 10,537,781	\$ 80,256,000

<b>Table 3 - Mitigation - Fire Protection / EMS</b>	Description	Capital Costs	20 Year Maintenance / Operations Costs
Alternative #1 Cost Of Mitigation	Station Addition, Equipment & 3 Full Time Staff Operations Cost based on Bellingham Fire Dept. Cost per Full Time Employee with 20% Escalation Over 20 years	\$ 933,500	\$ 11,088,000
Alternative #3 Cost Of Mitigation	1 Full Time Staff and Station Addition	\$ 200,000	\$ 3,696,024
Net Cost for Alternate 1 Over and Above Alternative 3	\$ 8,125,476	\$ 733,500	\$ 7,391,976

<b>Table 4 - Mitigation - Law Enforcement</b>	Description	Capital Costs	20 Year Maintenance / Operations Costs
Alternative #1 Cost Of Mitigation	800 Sq Ft Additional + 3 Deputies	\$ 180,000	\$ 10,831,248
Net Cost for Alternate 1 Over and Above Alternative 3	\$ 11,011,248	\$ 180,000	\$ 10,831,248

<b>Table 5 - Mitigation - Parks and Trails</b>	Description	Capital Costs	20 Year Maintenance / Operations Costs
	Option 1 Creates an Additional Park in Kendall above Improvements Common Between Option 1 and Option 3 and Smaller Park for Columbia Valley in Option 3	\$ 800,000	\$ 1,500,000
Net Cost for Alternate 1 Over and Above Alternative 3	\$ 2,300,000	\$ 800,000	\$ 1,500,000

<b>Table 6 - Total Mitigation 20 Year Cost for Alternative 1 Over and Above Alternate 3</b>	\$ 113,005,505	\$ 12,826,281	\$ 100,179,224
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cc Becky Box, for Whatcom County Planning Commission  
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 Troy Schroeder, SEPA Official  
 Gary Davis, Senior Planner