

RECEIVED

SEP 15 2008

LONG RANGE
PLANNING DIVISION

September 15, 2008

To: David Stalheim, Director
Whatcom County PDS
Cc: Matt Aamot, Senior Planner

My name is Richard Banel and I was a member of the Foothills Subarea Planning Committee (FSPAC) and am a signatory of the majority report, which is the subject of the Draft Environmental Impact Statement. I am also an elected official here in the Columbia Valley; I am a Water Commissioner for the Evergreen Water-Sewer District that serves the Paradise Lakes subdivision, but I am giving this testimony as a private resident of the Columbia Valley Urban Growth area.

It is my position that of the three alternatives offered in the DEIS, alternative one is the only technically correct alternative, because it adopts the majority recommendations of the FSPAC. The FSPAC recommendation is based over two years worth of committee work, and included public testimony from residents of the Columbia Valley UGA. It was this public testimony that led to the majority recommendation of Foothills Subarea Planning Committee. For Whatcom County to adopt either of the other two DEIS alternatives amounts to arbitrary action, especially for the reason that it subverts two years worth of public process and ignores the public testimony of the stakeholders, the residents of the Columbia Valley.

Thus, it is no coincidence that adoption of alternative one (retention of the Columbia Valley UGA without the mitigation maps) will best serve the interests of the residents of the Columbia Valley UGA as well.

And of the two other alternatives contained in the Draft Environmental Impact Statement, alternative no. 3, in which the Columbia Valley would lose its status as a UGA, and would instead revert to a LAMIRD, is totally inconsistent with the goals and policies pertaining to urban development in the UGA. It is a well-known fact that the Columbia Valley is already developed at urban residential densities, a fact that the Whatcom County Planning Commission has somehow been able to ignore. And alternative no. 3 could potentially drive projected growth into the rural areas of the foothills this is not consistent with the community's vision of preserving rural character

In my opinion, another technical problem with the DEIS is the **apparent** unfair influence of the Friends of the Foothills (FOF), a local special interest corporation on record for opposing development in the Columbia Valley UGA. There is speculation among some of the majority that three FSPAC members forwarded agendas throughout the process designed to subvert and undermine the work of the committee. Please note also that not one of the suspected FOF members live within the Columbia Valley UGA. I would argue that the inclusion of members belonging to this special interest corporation on the FSPAC could constitute a bias against any fair and objective process. It is likely not a coincidence that this is the same group of three that authored a minority report critical of the FSPAC majority recommendations that they help to create. To the extent that the process has improperly and unfairly been subverted, this technical problem can be corrected, by reducing the minority opinion to the level it deserves.....public comment.

Richard Banel
8525 Juniper Place
Maple Falls, WA 98266