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PLANNING DIVISION

David Stallheim, Director,
Whatcom County Planning and Development Services
Bellingham, Washington

September 15, 2008

Dear Mr. Stallheim:

I would like to address the Draft Supplemental Environmental Impact Study (DSEIS) from the perspective of a fellow researcher. I believe it falls short of providing the information necessary to make reasonable and sound policy decisions regarding the current draft of the Foothills Subarea Plan (DFSP). Here are the reasons behind this statement along with some recommendations for revision.

In September 2007, I was a member of a team of researchers that submitted a research study report to the US Department of Homeland Security. This project has some similarities to the DSEIS from the perspective of both methodology and outcomes. It compared three study-sites, similar to the three scenarios the DSEIS compared and both reports were designed to guide the decisions of policy makers. Therefore, a brief description of the Multicultural Health and Safety Research Project is provided below.

The contract included five research questions from which the research team extracted a series of 11 variables. Following the development of the research methodology and a pilot study to test and refine the research procedures and data gathering instruments, the researchers visited the three sites and replicated the data collection process. In the final report, the data was presented so policy makers could directly compare the study-sites on each of the seven most critical variables used to answer the research questions.

Earlier this year, Whatcom County Planning and Development Services (PDS) undertook a similar kind of study designed to assist policy makers to examine the viability of a draft of the Foothills Subarea Plan developed by an 11-member citizens advisory committee. The introductory letter to the DSEIS stated that the study "evaluates the comparative merits of these [three] alternatives for consideration by the Whatcom County Planning Commission and County Council." Furthermore, the letter identifies a series of items, or variables, the DSEIS addresses and its anticipated outcomes, that is, the examination of " . . . existing conditions, environmental impacts and potential mitigation measures."

The three alternative scenarios are: 1 – DFSP (Oct. 2007) Alternative; 2 – No Action Alternative/Existing Land Use Designations; and 3 – Rural/LAMIRD Alternative.

The following variables, identified in the study, served as the basis of the comparison: (1) Planning Horizon Year; (2) Land Use Designations; (3) Residential Population Estimates; (4) Employment; (5) Columbia Valley UGA size and Land Use Designations; (6) Deming; (7) Welcome; (8) Kendall; (9) Maple Falls; (10) Glacier; and (11) Goals and Policies.

For this study to be effective, it is essential to demonstrate how the variables affect each of the scenarios so that the study results are understandable and helpful to citizens and elected officials. Because the study deals with so many variables, it is important to select the most critical ones to manipulate. Otherwise the reader will be overwhelmed with complexity.

To reach this end, one variable must be manipulated or changed, while other variables are controlled/kept or made constant.

For example, altering the size of the Columbia Valley UGA, as the Alternatives do, would mean controlling all the other variables to show how the size of the CV UGA would influence each scenario.

That would mean changing the Planning Horizon Year so that they were the same for each alternative (differing horizons blur the picture, it's like comparing apples and oranges) and choosing, say, the mid-projection of the Residential Population Estimates and holding it and all other variables constant across each scenario.

Using the same example, the reader should then be able to understand what impact the different sizes of the CV UGA would have on the population growth of the Foothills small towns, especially an area like Glacier where 767 of the 895 dwellings are either seasonal or vacant. Two more sets of the scenarios, for instance, could examine the impact of the low and the high population projections. Such a sequence of nine scenarios would provide the reader with a comprehensive view of the population growth impact of changing the size of the CV UGA.

Unfortunately, the DSEIS is not organized in this way. In the scenarios, the variables have not been prioritized as to importance. In addition, no controls have been placed on the variables. The reader is unable to see how a variable like changing the size of the CV UGA or the different Residential Population Estimates impact each of the Alternatives. That is because so many of the variables change within each of the scenarios presented. This is confusing to the reader.

As it is currently organized, this draft of the Supplemental Environmental Impact Study fails to clarify the differences between the alternatives offered based on the variables identified. Therefore, the document does not serve as an effective or adequate policy development guide for Whatcom County decision makers.

However, the scenarios section of the DSEIS could be revised into a useful document for citizens and elected officials alike. That would require the selection of the most critical variables and it seems that population projections and the size of the CV UGA would be high on that list. Secondly, the most important variables would be manipulated while other variables would need to be controlled to enable readers to see how the manipulated variable would influence each of the Alternatives. Finally, in order to provide a full picture of the impact of the manipulated variable, a sequence of scenarios would be necessary. These sequences could be placed in the appendix and summarized in the body of the report.

These revisions would greatly improve the usefulness of the DSEIS and I would encourage PDS to implement them.

Sincerely,

Lou Piotrowski
Glacier