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MAY 26 2010  
Whatcom County P&DS

Whatcom County Planning Commission  
Whatcom County Planning Commissioners  
5280 Northwest Drive, Suite B  
Bellingham, WA 98226

Re: Foothills Subarea Plan Public hearing

Dear Planning Commissioners:

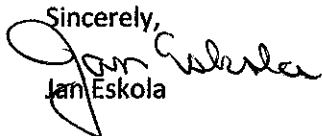
I am currently a member of the Foothills Subarea Plan Advisory Committee.

Attached please find copies of documents for your review in connection with the upcoming Public hearing on the 2010 Draft Foothills Subarea Plan:

1. Minority Report issued October 24, 2007. Please be advised that this report is still pertinent to the current Draft Plan.
2. An Analysis by the Minority Committee Members of the Foothills Subarea Plan Advisory Committee regarding population projections. This analysis is also still pertinent to the current Draft Plan.

I would urge the Planning Commissioners to review these two reports in advance of the public hearing.

Thank you for your time and consideration of these important issues.

Sincerely,  
  
Jan Eskola

**MINORITY REPORT**  
**Foothills Subarea Citizens Advisory Committee**  
**October 24, 2007**

This Minority Report is submitted based on the minority votes taken by the Minority Members of the Foothills Subarea Citizens Advisory Committee (referred to herein as the "Foothills Advisory Committee") who are signatory to this report. The minority votes were reported in the Records of Decisions and Recommendations of the Foothills Advisory Committee. The full language of the minority votes, as found in the Records of Decisions and Recommendations, are attached hereto as Exhibit A.

All but one of the minority votes addressed in this Minority Report were by the three committee members who have signed this Minority Report. Only one of the three Minority Members voted for the January 3, 2007 minority vote. At that vote, the second member of the three was absent due to illness and the third member of the three abstained from voting; however, the third member spoke passionately and eloquently, as the recorded minutes show, against the votes taken by the Majority Members at the January 3<sup>rd</sup> meeting. The January 3, 2007 minority vote is fully supported by all three committee members who have signed this Minority Report. There was a fourth committee member who voted with the Minority Members on the February 21, 2007 vote, but he has not joined in this Minority Report.

**I. Summary of Votes at Issue**

The complete original votes subject to this Minority Report are in Exhibit A to this Minority Report. In summation, the Minority Members' votes addressed the following areas:

1. **Population Projections for Glacier, Maple Falls, Deming, the UGA and the Remaining Subarea** (*for which the Minority Members voted in favor of lower projections than the Majority Members adopted*);
2. **Certain decisions involving the Columbia Valley Urban Growth Area (the "UGA"):**
  - a) Town Center Comprehensive Plan Overlay Designation (*for which the Minority Members voted against establishing a Town Center Overlay Designation in the UGA*);
  - b) Town Center Policy (*for which the Minority Members voted against rezoning the Town Center Overlay from residential to General Commercial or a new Town Center Zone*);
  - c) Treatment of Policy 2AA-13 of the Whatcom County Comprehensive Plan (in sum, the Policy had precluded additional commercial zoning within the UGA until the Kendall Small Town Commercial District ("STC") was fully developed, and a land supply study demonstrated a need for additional commercial land) (*for which the Minority Members voted against deleting the Policy 2AA-13*);
  - d) Changing the Eastern and Northern boundaries of the UGA The three (3) votes which addressed these issues are as follows:
    - i) Changing the Comprehensive Plan designation of the 40 acre Holly and Associates/S.C. Goshen site (on the eastern side of the UGA) from Rural to UGA, and changing the zoning designation of those 40 acres from Rural Forestry to Urban

Residential 4 (“UR4”) (for which the Minority Members voted against changing either of the two designations); and

ii) Adding ‘Potential Planned Light Impact Industrial Designations’ within and/or bordering on the UGA to the Map of Land Use Alternatives. If the original 40 acres of ‘Planned’ Light Impact Industrial acreage are built out, an additional 40 acres of the ‘Potential’ Planned Light Impact Industrial acreage will be added to the UGA; that additional 40 acres can be either within the existing UGA or outside of and bordering on the UGA. Please see the relevant section of Foothills Advisory Committee’s Policy Matrix which is found in Exhibit A to this Report, under the June 27, 2007 Record of Decisions and Recommendations. (*The Minority Members voted against the addition of a ‘potential’ light impact industrial zone.*)

3. **Cluster Zoning in the Rural Area** (for which the Minority Members voted in favor of no cluster zoning in the Rural Zones).

4. **Concurrency requirements for developments** (for which the Minority Members voted in favor of concurrency requirements).

As a comment, the Recommended Subarea Plan does not identify which decisions were by vote as opposed to consensus, so the reader of the Plan does not know of these issues.

The following report will address the Minority Members’ concerns and issues which lead to each of their votes on the votes listed above, and will conclude with an analysis of the consequences of the Majority Members’ Votes, and the Minority Members’ disagreement with the Subarea Plan recommended by the Majority Members.

## **II. Reasons for each Minority Vote**

### **1. Population Projections**

a) **Difference in population projection formula between Prof. McLaughlin and EcoNorthwest:** On July 19, 2006, Prof. John McLaughlin of Western Washington University delivered a slide presentation on population projections to the Foothills Advisory Committee,. He discussed his analysis of population projections and population biology as it applies to the Foothills Subarea. His input was requested as an alternative to population projections which had been presented by EcoNorthwest to the Foothills Advisory Committee. EcoNorthwest is a consulting firm previously utilized by the Whatcom County Council for population projections. EcoNorthwest was hired by Studio Cascade to develop a population forecast for the Foothills Subarea.

*Please note that a copy of the slide presentation can be obtained from Prof. McLaughlin.*

Prof. McLaughlin says that his formula is logarithmic and bottom-up whereas EcoNorthwest’s formula is exponential and top-down. The McLaughlin formula utilizes ‘feedback’ which, according to Prof. McLaughlin, is not addressed by EcoNorthwest. To assess accuracy of his formula, Prof. McLaughlin tested his formula against historical population growth data, and compared the success of his formula to the correlation of the EcoNorthwest formula against historical population growth. Prof. McLaughlin stated that, when the two formulas were tested against historical growth patterns, his formula was far more accurate than EcoNorthwest’s formula.

Prof. McLaughlin's population projections indicate that the population growth over the 20 year term of the Subarea Plan will be significantly lower than the growth projected by EcoNorthwest.

b) **Majority Members' votes to exceed EcoNorthwest's Recommended Population Projections.** EcoNorthwest had recommended the Baseline (or mid-level) population projection for the entire Foothills Subarea, including the UGA and the STCs. The Majority Members did not follow that professional recommendation and instead voted for higher population projections for Glacier, the Columbia Valley UGA and the Remaining Subarea (that is, the portion of the Subarea which is outside of the STCs and the UGA).

c) **Conclusion.** The Minority Members voted against the Majority Members' positions supporting or exceeding the EcoNorthwest population projection recommendations. The Minority Members concluded that Prof. McLaughlin's population projections for the Foothills Subarea are more accurate than the EcoNorthwest projections.

## 2. Establishment of a Town Center Overlay in the UGA

a) Adding a town center overlay is premature as the UGA has not yet developed as a municipality. First the community needs to establish a municipal identity, and then the location of the town center will be driven by the location of the municipal center.

b) Adding a zoning provision for a town center commercial/industrial center is premature as the UGA has not yet developed a municipal identity or structure.

## 3. Removing Whatcom County Comprehensive Plan Policy 2AA-13

Deleting the Whatcom County Comprehensive Plan Policy 2AA-13 was not justified by the facts, as very little development has occurred in the Kendall STC since the original Policy was adopted in December 1999 by the County Council.

The original Policy 2AA-13 is as follows:

*"Preclude additional commercial zoning within the urban growth area until the Small Town Commercial district in Kendall is fully developed and a land supply study demonstrates a need for additional commercial land."*

Policy 2AA-13 would have precluded commercial development in the UGA until the Kendall STC had been built out. As of October 2007, only an addition to the Fire District site (which was not qualified for commercial development anyway) and the 1,200 square foot addition to the Paradise Store have been built in the Kendall STC since December 1999. No good faith argument can be made that the Kendall STC zone has been "fully developed" since December 1999.

## 4. Changing the Eastern and Northern Boundaries of the UGA

a) **General.** The Foothills Advisory Committee, by consensus, relocated the southern boundary of the UGA so as to reduce sprawl in accordance with the planning goals of the GMA. The boundary was moved north from the Mount Baker Highway to the southern edge of the Paradise development.

The Majority Members however subsequently took two votes which had the results of moving the eastern boundary of the UGA further east and of potentially moving the northern boundary of the UGA further west. The Minority Members disagreed with those votes for the following reasons.

**b) Eastern Boundary: 40 Acre Holly and Associates/S.C. Goshen Site.**

Changing the Whatcom County Comprehensive Plan designation of the 40 acre Holly and Associates/S.C. Goshen site from Rural to UGA, and changing the zoning designation of those 40 acres from Rural Forestry to UR4 were not justified by the land use needs analysis conducted by the Foothills Advisory Committee. There is sufficient acreage in the original UGA, even as reduced by moving its southern boundary north of Kendall, to meet the population projections, without the need to change either the Whatcom County Comprehensive Plan designation or the zoning of these 40 acres.

**c) Northern Boundary: Light Impact Industrial Acres.** Based on Studio Cascade's expert analysis of land use requirements discussed below, the Minority Members do not think that potential additional light impact industrial acres are needed at all, whether within the UGA or outside the UGA. The current 40 planned acres are sufficient, and certainly there is no justification for an additional 40 acres, for a total of 80 acres which is possible under the Recommended Subarea Plan.

The maximum amount recommended by the consultant Studio Cascade in its report entitled "Whatcom County Foothills Subarea Plan Industrial Land Forecast 2017/2027" dated as of June 15, 2007, is 32 net developable acres. (See the following paragraph for the definition of 'net developable'.)

The concluding paragraph of the Industrial Land Forecast is reprinted below:

"The forecast demand for net developable<sup>1</sup> industrial land within the entire subarea can be calculated as follows:

Forecast industrial employment growth in the subarea 2007-2017 = 53 to 85 employees  
Ratio of industrial employee per acre of industrial land = 8 to 12 employees/net acre  
Forecast industrial land demand in the subarea in 2017 = 5 to 11 acres

Forecast industrial employment growth in the subarea in 2017-2027 = 89 to 167 employees  
Ratio of industrial employee per acre of industrial land = 8 to 12 employees/net acre  
Forecast industrial land demand in the subarea in 2027 = 8 to 21 acres"

<sup>1</sup> "Net developable" industrial land is the acres needed for industrial uses after subtracting areas with development limitations such as steep slope, flood areas, and other critical areas, and land needed for rights-of-way, utilities, infrastructure, and open space.

*Please note that a copy of Studio Cascade's Industrial Land Forecast report can be obtained from Whatcom County Planning and Development Services.*

The Recommended Subarea Plan instead provides for:

- i) a minimum of 40 acres of land zoned for planned light impact industrial development,
- ii) plus an additional 40 potential acres for light impact industrial development already within the UGA (for an aggregate total of 80 acres within the UGA),
- iii) plus an additional 80 potential acres for light impact industrial development entirely outside of the UGA.

If the original 40 acres are built-out, an additional 40 acres may be added, as approved by the Majority Members, for a total of 80 acres specifically committed to by the Recommended Subarea Plan. The potential additional 80 acres, in addition to the committed 80 acres, are a fallback in case the committed acres cannot be used. Although the total 160 acres for planned and potential light impact industrial use are in essence a moving target which are intended to maximize options for choice of the committed 80 acres, there are two problems with this vote.

First, even accounting for 'net developable' industrial land, as defined above, the ultimate, capped, 80 acres exceeds Studio Cascade's recommended total as of 2027 of 18 acres to 32 acres. Even assuming that the 32 acres of industrial land forecast for 2027 is in fact reached, the 48 acre excess proposed in the Recommended Subarea Plan is far too much. There is no justification for that excess, and as such the capped acreage should be reduced to 40 acres. The Recommended Subarea Plan approach of permitting 80 acres to be developed for light impact industrial land provides for far more industrial land than the Subarea will support or need.

The Growth Management Act, RCW 36.70A.130 and .215, provides for five and seven year 'look-backs', which would be the more appropriate method to determine whether or not it is proper to change the size of the UGA. It is inappropriate to dramatically over-size for future growth now, and adjustments in the UGA could be made early on in the 20 year planning period by the look-back process which will look at market factors, long before land supply is used up. The look-back process will bring the subarea plan into compliance with actual growth, and will implement measures to make sure that the subarea plan and UGA meet current needs.

Second, the recommended language lays the groundwork for expansion of the boundaries of the UGA for the entire 160 acres, notwithstanding the Majority Members' caveat to 'ensure that the total acreage does not increase' beyond 80 acres in the event of any boundary change due to the 'potential' light impact industrial land acreage. The Minority Members are concerned that it would be an easy jump from 'potential' to 'permanent' status of the approved 'potential' light impact industrial land scheme, thus possibly expanding the light impact industrial acreage (even if within the UGA) and possibly expanding the boundaries of the UGA (if the additional required acreage cannot be found within the UGA).

#### 5. Cluster Development in Rural Zone Area

Cluster development in the Rural Zone does not support rural character. Rural character not only preserves natural landscapes of the rural area, but must also foster traditional rural lifestyles, rural based economies, and opportunities to live and work in the rural area (*with credit to one of Futurewise's briefs in the Gold Star Resorts case for this phrasing*).

As stated by the Court of Appeals of the State of Washington, Division 1, in its opinion in the case of Gold Star Resorts, Inc v. Futurewise, Western Washington Growth Management Hearings Board and Whatcom County (*Court of Appeals, Division One, No. 58379-4-1, filed August 27, 2007*), several of the Growth Management Hearings Boards have held that 'Rural' contemplates no more than one house per five acres. Cluster development does not meet that definition even if the math equates to one house per five acres, because of the density of housing accomplished by cluster development. And cluster development has the consequence of creating a denser, urban feel subdivision and encourages more growth than single-family homes built on separate lots.

In addition, as discussed further below in Section III b), seventy-six percent (76%) of the respondents to the Questionnaire circulated by the Foothills Advisory Committee support continuing “*the type of single-family and rural residential patterns we now have in the Foothills*”. The only way to honor the 76% of the residents who answered the Questionnaire and who wished to maintain the single-family and rural residential patterns currently existing, would be to prohibit cluster development in the Rural zone. That prohibition would follow the prohibition on cluster development in the Rural Forestry zone which was adopted by the Foothills Advisory Committee.

For these reasons, the Minority Members voted against cluster zoning in the Rural area.

## 6. Concurrency

The Minority Members had originally proposed to the Foothills Subarea Committee and to the consultant, Studio Cascade, a provision for the Draft Subarea Plan which would have provided that developers must have in place all infrastructure within one (1) year of commencing construction on a development. The Minority Members’ proposal was the following:

- *It is the policy of Whatcom County that all statutory and regulatory concurrency requirements must be met at the same time as the issuance of any building permit. Public services shall be built and available within one year of commencement of construction with evidence of ability to complete.*

The Policy proposed instead by Studio Cascade utilized only the Minority Members’ first sentence but then omitted the critical change proposed by the Minority Members of a timing provision dramatically shorter than the 6 years currently in place in Whatcom County. The Minority Members in fact support the idea of concurrency and completion of infrastructure *before* the home building is started, but acknowledge the difficulty of both politically and practically accomplishing such an aggressive policy. Therefore, the Minority Members proposed a one (1) year time frame for completion of public services infrastructure.

Regarding the comments at a recent meeting of the Foothills Advisory Committee that the proposal was inappropriate for a Subarea Plan, the Minority Members wished to send a message to the County Council that they supported tightening the existing concurrency ordinance so as to shorten the compliance period from 6 years to a shorter time period and to thus make the ordinance more effective.

The Minority Members wish to avoid future developments where the infrastructure is never completed by the developer, or was flawed, notwithstanding the current concurrency ordinance. The carrying capacities of proposed developments must be dealt with now, to avoid future problems. If the carrying capacity does not exist and cannot be provided for contemporaneously, developments should not be built.

### **III. Totality of Policies, Goals and the Text of the Recommended Subarea Plan**

In anticipation of questions about the fact that the Minority Members were in consensus on the majority of the decisions made by the Foothills Advisory Committee, the Minority Members wish to state that although they were in consensus when certain decisions were made, they do not believe that the Recommended Subarea Plan goes as far as they had hoped and anticipated. The consequent result is that the totality of the text of the Plan does not have the impact that the Minority Members expected from their consensus decisions. It was one thing to adopt individual decisions as the planning process proceeded, but it is completely different to see how the combined decisions were reflected in the text of the Recommended Subarea Plan. The provisions of the Recommended Subarea Plan which support growth and economic development far outweigh the provisions which protect rural character and the environment. The integrated, cumulative impact and effect of all components of the final Plan were less protective of rural character and the environment than anticipated by the Minority Members.

### **IV. Consequences of the Majority Votes**

1. **Population Projections** As a consequence of voting for population projections that were contrary to both the recommendations of Professor John McLaughlin and to the recommendation of EcoNorthwest, the Majority Members then had to plan for more growth throughout the entire Subarea. Higher growth projections came at the cost of protecting the rural character of the Foothills. As a matter of fact, many of the land use policies in the Recommended Subarea Plan for the Small Town Commercial zones contemplate additional growth rather than maintaining rural character. By way of example, encouraging apartments on the upper stories of buildings in the STCs will give more of an urban feel to the STCs than presently exists, but appears to have been added to accommodate more population growth.

In addition, planning for more growth without an in-depth analysis of carrying capacity does not serve to maintain rural character. Although the Foothills Advisory Committee balanced population projections against available land, and did look at current water and sewer connection potentials, there was no analysis by the Foothills Advisory Committee of the following carrying capacity issues, notwithstanding requests by the Minority Members to do so:

- impact on or drawdown of the Columbia Valley aquifer, or any cone of depression which would result from a dramatic increase in the drawdown of the aquifer, with consequent results on ground water, creeks and rivers, private wells, and salmon and other fish habitat.
- the highly permeable soils of the Columbia Valley, to determine whether or not there would be either (1) adequate aquifer recharge to provide sufficient water for all residents, the Fish Hatchery and the Nooksack River, or (2) sufficient filtration to filter out impurities created by more housing and roads, so as to avoid pollution of our water.
- any increase in Level of Service traffic and road issues on the Subarea roads that will likely be caused by increase in population.
- any increase in taxes for schools, fire service, parks, sheriff assistance or emergency medical assistance.
- input and feedback from Water Resource Inventory Area 1 ("WRIA 1") with regard to regional storm water management.
- safety routes for emergency evacuations from the UGA (forest fire, volcanic activity, land slides, etc.), which currently has only two exit and entry routes into and out of the UGA which is

proposed to have at least half of the population of the Foothills, as well as safety routes for emergency evacuations from the rest of the Foothills.

These carrying capacity issues, as well as other carrying capacity issues which could be raised by other parties, should have been addressed by the Foothills Advisory Committee.

**2. A second consequence of the Majority Members' Votes is that the Recommended Plan does not give sufficient weight to several of the mandates from the Foothills Subarea Residents obtained through Vision Week workshops, the UGA workshop and the Kendall STC workshop, and the Questionnaire Responses from 379 residents of the Foothills Subarea.**

In support of this statement, we have quoted below certain sections (which include the full indicated question as well as the response analysis) from the Questionnaire Response Report that the Advisory Committee utilized in its review and preparation of the Recommended Subarea Plan:

a) **density policy in UGA**

Land Use/Housing	Strongly Agree	Agree	Disagree	Strongly Disagree	No Opinion
<b>3e. I support increasing housing density in the Columbia Valley/Kendall Urban Growth Area beyond what is currently allowed.</b>	30 8.3%	57 15.7%	98 27.0%	149 41.0%	29 8.0%

The results of this question show that 68% of respondents disagreed with increasing housing density in the UGA beyond that which is currently allowed. Potentially increasing the acreage which is subject to the UGA, whether for residential purposes (such as the added Holly and Associates land) or for light impact industrial purposes, will increase the housing density even if only by increasing the number of acres subject to UR4 zoning and putting pressure on the existing acreage by creating a light impact industrial zone outside of a residential zone, and by creating a town center with combined commercial and residential zones.

If you combine this question's results with the results of the following three questions on housing style, rural character, and water quality, and the following Prioritization of Policy Choices which was also included in the Questionnaire, there is no mandate for potentially expanding the UGA, creating a Town Center overlay or for dropping Whatcom County Comprehensive Plan Policy 2AA-13.

b) **housing style in the Foothills**

Land Use/Housing	Strongly Agree	Agree	Disagree	Strongly Disagree	No Opinion
<b>3b. I think we should continue the type of single-family and rural residential patterns we now have in the Foothills.</b>	144 39.2%	136 37.1%	45 12.3%	20 5.4%	22 6.0%

c) **rural character of the Foothills**

Land Use/Housing	Strongly Agree	Agree	Disagree	Strongly Disagree	No Opinion
<b>3f.</b> I support retaining the rural character of the Foothills area.	237 <b>68.3%</b>	85 <b>24.5%</b>	14 <b>4.0%</b>	4 <b>1.2%</b>	7 <b>2.0%</b>

d) **maintaining water quality**

Sewer/Water	Strongly Agree	Agree	Disagree	Strongly Disagree	No Opinion
<b>2b.</b> Protecting the high quality of water in Foothills is important to me.	254 <b>68.3%</b>	104 <b>28.0%</b>	6 <b>1.6%</b>	2 <b>0.5%</b>	6 <b>1.6%</b>
I think water conservation is important because:					
<b>2c.</b> My well goes dry periodically.	19 <b>7.6%</b>	20 <b>8.0%</b>	46 <b>18.3%</b>	65 <b>25.9%</b>	101 <b>40.2%</b>
<b>2d.</b> My water quality degrades periodically.	20 <b>7.8%</b>	33 <b>12.8%</b>	60 <b>23.3%</b>	68 <b>26.4%</b>	77 <b>29.8%</b>
<b>2e.</b> For protection of fish habitat.	142 <b>45.7%</b>	89 <b>28.6%</b>	14 <b>4.5%</b>	27 <b>8.7%</b>	39 <b>12.5%</b>
<b>2f.</b> Other: <i>2f_desc</i>	23 <b>67.6%</b>	9 <b>26.5%</b>	0 <b>0.0%</b>	0 <b>0.0%</b>	2 <b>5.9%</b>

e) **Prioritization of Policy Choices**

Part Three – Tradeoffs and Priorities

Making policy choices involves tradeoffs. There are ten topics listed here, including a “wild card” that you can fill in. Please **rank** them (1 through 10) in order of importance to you, with “1” being the most important. It’s supposed to be difficult.

<b>8a.</b> Local jobs	Rank <b>7</b>	<b>8f.</b> Rural character	Rank <b>1</b>
<b>8b.</b> Improved levels of service	<b>6</b>	<b>8g.</b> Convenient access to urban areas	<b>9</b>
<b>8c.</b> Housing affordability	<b>10</b>	<b>8h.</b> Environmental Protection	<b>3</b>
<b>8d.</b> Water quality	<b>2</b>	<b>8i.</b> Emergency response and law enforcement	<b>4</b>
<b>8e.</b> Recreation	<b>5</b>	<b>8j.</b> Other: <i>8j_desc</i>	<b>8</b>

Rural Character, Water Quality and Environmental Protection were the top three priority concerns of respondents to the Questionnaire. And ‘convenient access to urban areas’ ranks merely 9<sup>th</sup> on the prioritization! The Majority Members’ Recommended Subarea Plan instead emphasizes growth and

urban services ahead of rural character, water quality and environmental protection, and thus does not give sufficient weight to the requests and vision of the residents of the Foothills.

As a comment, although the Questionnaire results were only one portion of the information obtained by the Foothills Advisory Committee regarding the opinions of the residents of the Foothills, those opinions should not be ignored.

Studio Cascade's analysis of the Questionnaire results shows that although 376 people responded to the Questionnaire, only 199 people indicated where they lived, 91 people indicated where they worked, and 222 people indicated where they owned property. Therefore, not all respondents participated in the mapping of locations of respondents. Interestingly, of the 199 people who indicated where they lived, approximately 76 of the respondents live in the UGA while the remaining 123 people who indicated where they lived were from outside of the UGA. 177 of the total respondents did not indicate where they lived.

Comments were made at meetings of the Foothills Advisory Committee that, because there was insufficient response from the UGA, the results of the Questionnaire were not sufficiently representative of the Foothills' residents' opinions as an entirety, and particularly the opinions of residents of the UGA. Approximately 5,500 questionnaires were distributed. The 376 responses represent approximately 6.8% return rate, which is a respectable return rate for public surveys.

In addition, the respondents to the Questionnaire took the time and energy to complete the questionnaires and, like in an election, their 'votes' should count. Voters who choose to participate in the election process get their votes counted, while those who stay home and do not vote, do not impact the outcome of an election.

The Whatcom County Comprehensive Plan, Appendix C- County-wide Planning Policies, Section A Subsection 4 provides the following:

*"4. Citizen comments and viewpoints shall be incorporated into the decision-making process in development of draft plans and regulations. Consideration of citizen comments shall be evident in the decision-making process."*

The Questionnaire results were obtained through a great deal of time, effort and thought by both the Foothills Advisory Committee and the residents who responded to the Questionnaire. The Foothills Advisory Committee felt that the questions were very important and spent many meetings drafting and redrafting the questionnaire in order to craft questions which reflected the specific local issues unique to the Foothills. The results of the Questionnaire should be followed more closely in the recommended Subarea Plan.

*Please note that the complete Questionnaire Response Report can be obtained from Whatcom County Planning and Development Services.*

**3. A third consequence of the Majority Members' votes is that the Majority Members recommended formal designation of the existing 40 acres of light impact industrial land, laid the groundwork for adding an additional 40 acres (for a total of 80 acres) of light impact industrial land within the UGA, and also laid the groundwork for potentially adding up to an additional 80 acres (for a total of 160 acres) of industrial land currently outside the UGA.**

At a minimum, 80 acres of light impact industrial are permitted under the Recommended Subarea Plan, which is not supported by Studio Cascade's Industrial Land Report.

In addition, even though there is a prohibition on expanding the light impact industrial land beyond 80 acres, in total, the fact that the Recommended Subarea Plan provides for a floating 120 acres, (from which 40 acres could be chosen should the original 40 acres either be built in full, or fail to be buildable), could easily provide justification for permanently expanding the light impact industrial land to the full 160 acres should there be problems with portions of the acreage.

The Majority Members' Vote is not supported by the expert's report, at the cost of rural character.

**4. A fourth consequence of the Majority Members' Votes is that the Recommended Subarea Plan does not emphasize adequate protection of either rural character or protection of the environment.**

Although the Recommended Subarea Plan does purport to protect rural character by ensuring that much of future development occurs in the UGA, and by minimally addressing some aspects of rural character, there are many other steps that could be taken to protect rural character, such as:

- protecting rural views,
- maintaining the rural character of roads and crossroads,
- protecting dark night time skies and avoiding light pollution,
- minimizing noise, glare, visual and other intrusions into residential and rural areas,
- specific site design criteria to preserve the rural identity of the STCs and encourage economic vitality through a positive visual identity,
- storm water design requirements for developments outside of the UGA (which had been included in the 1988 Foothills Subarea Plan),
- protecting the agricultural areas of the Subarea, and
- prohibiting cluster development in the Rural zone.

We also suggest the inclusion of many of the provisions suggested by the Subcommittee (of the Foothills Advisory Committee) which reviewed and updated the 1988 Foothills Subarea Plan (the '1988 Update'), including, by way of example, the following:

- 5.03.4 (page 35 of the 1988 Update)  
*Comprehensive plan designations, development regulations and incentives shall be provided that will encourage visitors to the area. These include the preservation of the area's scenic beauty, historical features and rural character.*
- 8.06 (page 20 of the 1988 Update)  
*It is the policy of Whatcom County that all statutory and regulatory concurrency requirements must be met at the same time as the issuance of any building permit. Public services shall be built*

*and available within one year of commencement of construction with evidence of ability to complete.*

- 8.07 (page 20 of the 1988 Update)  
*To insure that development meets and does not exceed the carrying capacity of public services and the natural features of the landscape the number of annual building permits should not exceed one-twentieth (1/20) of the 20 year population projections adopted by the Foothills Subarea Plan.*

(Note: the Permit Metering provided for in Policy LU11-F of the Recommended Subarea Plan, unlike the provision which this Minority Report suggests, is permissive rather than mandatory, and does not include a formula for the metering. Policy LU11-F is as follows: "Consider permit metering if the carrying capacity of public services has been met by existing development.")

- 8.08 (page 20 of the 1988 Update)  
*It is the policy of Whatcom County to require legally binding permanent deeds, easements and covenants for open spaces and greenways in all subdivisions and Planned Unit Developments.*
- 8.09 (page 20 of the 1988 Update)  
*To maintain the rural character throughout the Foothills Subarea, it is the policy of Whatcom County to require shielded, non-glare lighting in order to minimize light pollution to the maximum. The night sky is a valued, intrinsic asset of rural character.*

*A copy of the 1988 Update is available from Whatcom County Planning and Development Services.*

Regarding protection of the environment, we point out that there is a subtle difference between the way that the 1988 Update views the environment, and the way that the Recommended Subarea Plan treats the environment. To point out one instance in particular, the 1988 Update provides the following Policy (found at page 34) as an indication of the deference which economic development should give to protection of the environment:

*"5.01 Purpose: It is the policy of Whatcom County to promote economic development in the Foothills Subarea by:*

*5.01.1 Recognizing and protecting (emphasis added) the natural resources of the area, including fish, timber, minerals, scenic beauty, and recreational opportunities;*

*5.01.2 Providing for new economic development relating to the natural resources; aquaculture, fisheries, and recreation and tourism;*

*5.01.3 Recognizing forestry, natural resource extraction, tourism and recreation as the most significant potential generators of jobs, profits, and taxes in the Subarea; and*

*5.01.4 Recognizing the economic potential of cottage industries and home-based businesses."*

The Recommended Subarea Plan instead defers to economic development, and does not emphasize protection of the environment in the same way as the 1988 Update. By example, see the following:

*Policy EN2-A Assure adverse environmental impacts from industrial and commercial sites are managed and enforced in accordance with state law and County ordinances.*

Policy EN2-A does not prohibit adverse environmental impacts; instead, it will 'manage' the impacts. The subtle difference between the two plans results in the Recommended Subarea Plan providing that economic development takes precedence over environmental protection. Instead, there should be clearly articulated environmental protection in all regard.

We would also suggest that the Recommended Subarea Plan incorporate the recommendations made recently to the Foothills Subarea Committee of the WA Dept of Fish and Wildlife, as additional provisions to protect the environment. The Foothills Subarea Committee did not adopt those recommendations.

Last, the Implementation Projects and Implementation Tasks found at the end of the Recommended Subarea Plan are predominantly focused on either the UGA issues or economic development, with little regard for projects or tasks to protect rural character and the environment. We would suggest instead adopting the suggestions which we have made above.

**5. A fifth consequence of the Majority Members' Votes is that an insufficient determination was made as to whether or not the UGA is appropriately sized today. In addition, no determination was made as to whether or not the UGA should instead be identified as a LAMIRD.**

The Foothills Advisory Committee had the benefit of: (i) the population projections and analysis by EcoNorthwest; and (ii) land inventory analysis prepared by Whatcom County Planning and Development Services regarding all land uses in the Subarea; and (iii) industrial land use projections prepared by Studio Cascade; and (iv) commercial land use projections prepared by Studio Cascade.

However, as previously stated, the Foothills Advisory Committee did not follow the industrial land use recommendations for the UGA. In addition, the Foothills Advisory Committee did not address at all the commercial land use projections for the UGA. Last, regarding the land use inventory, the Foothills Advisory Committee did not address inventory issues in the UGA other than housing.

A review of the UGA's sizing and determination of how much land must be set aside for roads, schools, parks, infrastructure, and protection of critical areas should have been conducted as part of the Subarea Plan review process. In addition, a review should have been made as to whether or not the boundaries of the UGA itself meet the requirements for LAMIRD review and restrictions, rather than an UGA.

As previously mentioned, the Growth Management Act, RCW 36.70A.130 and .215, provides for 'look-backs', which would be the appropriate method to determine whether or not the size of the UGA is appropriate. In addition other provisions of the GMA may require a review as to whether or not the UGA should in fact be a LAMIRD. The look-back process will bring the Subarea plan into compliance with actual growth, and will implement measures to make sure that the designation of that land area meets current needs.

## **V. Disagreement with the October 17, 2007, Recommended Subarea Plan**

The small scale and character which we all cherish in the Foothills will be lost by suburbanization of the Foothills. The economic powerhouse here is tourism, and locally created and owned businesses. Tourists come because of the beauty of the mountains and the Foothills. If we permit the overdevelopment of commercial and industrial land uses, and we permit residential cluster developments in the Rural Zone, that rural character will be lost forever.

We need to create a land use ethic that protects the Foothills. The Foothills are important not only to the residents of the Foothills Subarea, but also to all residents of Whatcom County. We need to protect the landscape, the environment and rural character while providing people with a good place to live and work.

The Recommended Subarea Plan is a good start for the future of the Foothills, but it does not provide the protection which the Foothills needs in order to survive with any semblance of the rural character and natural beauty that all residents of Whatcom County cherish. We need to make sure that we take the best of two roads to the future, and that we do not regret what we did not choose. The difference between the road we take, and the road not chosen, with apologies to Robert Frost, will make all the difference in the world to maintaining the special character of the Foothills Subarea for now and for future generations.

RESPECTFULLY SUBMITTED AS OF OCTOBER 24, 2007.

\_\_\_\_\_  
Jan Eskola, Representative At Large

\_\_\_\_\_  
Amy L. Mower, Maple Falls Representative

\_\_\_\_\_  
Cynthia Purdy, Deming Representative

**FOOTHILLS SUBAREA PLAN ADVISORY COMMITTEE  
 RECORD OF DECISIONS & RECOMMENDATIONS  
 ON WHICH THE MINORITY MEMBERS TOOK A MINORITY VOTE POSITION**

Shown below are copies of the decisions and recommendations of the Foothills Advisory Committee on which the Minority Members took a minority position, which form the basis of this Minority Report. Copies of the Records of Decisions and Recommendations can be obtained from Whatcom County Planning and Development Services.

**I. At the December 20, 2006 meeting**, the Foothills Advisory Committee made the following Decisions and Recommendations:

1. **2027 Population Projections** - The Committee recommended utilizing the following 2027 projections of year-round population:

<i>Area</i>	<i>Recommended 2027 Population Projection</i>	<i>Population Increase from 2006-2027</i>	<i>ECONorthwest Growth Assumption*</i>	<i>Committee Vote</i>
Glacier	397	113	High	5-3 with 1 committee member abstaining
Maple Falls	254	41	Baseline	6-3
Deming	262	42	Baseline	6-3

\* Note: Consulting firm ECONorthwest provided low, baseline, and high growth projections in a report of December 1, 2006. The Foothills Advisory Committee recommended ECONorthwest's high growth projection for Glacier and baseline projections for Maple Falls and Deming.

**II. At the January 3, 2007 meeting**, the Foothills Advisory Committee made the following Decisions and Recommendations relating to the **Columbia Valley/Kendall Urban Growth Area (UGA)**:

1. **Town Center Comprehensive Plan Overlay Designation** - The committee recommended, by an 8-1 vote with 1 committee member abstaining, establishing a Town Center Comprehensive Plan Overlay Designation located immediately south of Campers Paradise and immediately west of Kendall Rd. (SR 547).
2. **Town Center Policy** - The committee recommended, by an 8-1 vote with 1 committee member abstaining, establishing a policy in the Foothills Subarea Plan that supports rezoning the Town Center Comprehensive Plan Overlay Designation to General Commercial (GC) or a new Town Center Zone. This area is intended for commercial , a

variety of residential housing types, and institutional mixed uses. Planning consultant Studio Cascade will draft the specific language of the proposed policy and present it to the committee with the draft Subarea Plan at a later date.

3. **Delete Policy 2AA-13** – The committee recommended, by an 8-1 vote with 1 committee member abstaining, deleting Whatcom County Comprehensive Plan Policy 2AA-13, which is to: “Preclude additional commercial zoning within the urban growth area until the Small Town Commercial district in Kendall is fully developed and a land supply study demonstrates a need for additional commercial land.”

**III. At the February 7, 2007 meeting**, the Foothills Advisory Committee made the following Decisions and Recommendations:

1. **2027 Population Projection** - The Committee recommended utilizing the following 2027 projection of year-round population for the “remaining subarea” (the area not included in Deming, Columbia Valley Urban Growth Area, Maple Falls or Glacier):

<i>Area</i>	<i>Recommended 2027 Population Projection</i>	<i>Population Increase from 2006-2027</i>	<i>ECONorthwest Growth Assumption*</i>	<i>Committee Vote</i>
Remaining Subarea	3,004	852	High	7-3 (with 1 committee member abstaining)

\* Note: Consulting firm ECONorthwest provided low, baseline, and high growth projections in a report of December 1, 2006. The Foothills Advisory Committee recommended ECONorthwest’s high growth projection for the remaining subarea.

**IV. At the February 21, 2007 meeting**, the Foothills Advisory Committee made the following Decisions and Recommendations relating to the **Columbia Valley Urban Growth Area**:

1. **2027 Population Projection** - The Committee recommended utilizing the following 2027 projection of year-round population for the Columbia Valley Urban Growth Area (this recommendation supersedes the recommendation made at the January 17, 2007, meeting):

<i>Area</i>	<i>Recommended 2027 Population Projection</i>	<i>Population Increase from 2006-2027</i>	<i>ECONorthwest Growth Assumption*</i>	<i>Committee Vote</i>
UGA	7,053	3,200	Between the Baseline and High	6-4 (with 1 committee member absent)

\* Note: Consulting firm ECONorthwest provided low, baseline, and high growth projections in a report of December 1, 2006. The Foothills Advisory Committee recommended a projection between ECONorthwest’s baseline and high growth assumptions for the UGA.

2. **UGA Expansion** – The Committee recommended, by a 7-3 vote (with 1 member absent), to change the Whatcom County Comprehensive Plan designation of the 40-acre Holly & Associates/S.C. Goshen site from Rural to Urban Growth Area (UGA). This site is adjacent to the east side of the existing UGA and can generally be described as:

The W ½ of the NE ¼ of the NE ¼ of section 22, T40N, R5E, W.M.; and  
The W ½ of the SE ¼ of the NE ¼ of section 22, T40N, R5E, W.M.

A map of the “Foothills Subarea Plan Advisory Committee Recommended Land Use Alternative – 2/21/2007” for the Columbia Valley UGA and adjacent lands (which incorporates recommendations from the 1/3/07, 1/17/07 and 2/21/07 Foothills Advisory Committee meetings) is *attached* to the original Record of Decisions and Recommendations.

**V. At the June 27, 2007 meeting, the following three records discuss various aspects of the minority vote taken at that meeting:**

**A. The Foothills Advisory Committee made the following Decisions and Recommendations:**

1. **Light Impact Industrial Designations** - The Committee recommended, by a 7-3 vote with 1 committee member abstaining, to establish the following industrial map designations generally located north of Limestone Rd.:

- Planned Light Impact Industrial Designation; and
- Potential Planned Light Impact Industrial Designation.

A map of the “Foothills Subarea Plan Advisory Committee Recommended Land Use Alternative – 6/27/2007” for the Columbia Valley UGA and adjacent lands (which incorporates recommendations from the 1/3/07, 1/17/07, 2/21/07, and 6/27/07 Foothills Advisory Committee meetings) is *attached* to the original Record of Decisions and Recommendations. This map shows the planned light impact industrial designations.

**B. The Minutes of the June 27, 2007 meeting amplify on the Report of Recommendations and Decisions for that date, as follows:**

- *“The committee chose to vote on Option B industrial overlay - 160 acres (north of Limestone Rd). This option contained about 40 acres of Planned Light Impact Industrial in the UGA north of Limestone Rd. It also included approximately 120 acres of Potential Planned Light Impact Industrial located generally north of Limestone Rd.*

*Approved by 7-3-1 committee vote. (Phil, Gary, Sean, Richard, Bill, Norma and Lou voted to approve Option B. Amy, Jan and Cindy were opposed. Alan abstained).”*

**C. The following is a copy of the sections of the Policy Matrix adopted by the Foothills Advisory Committee which was the background for the Light Impact Industrial Designations Recommendation:**

**Goal 2AA** (from the Whatcom County Comprehensive Plan) – Recognize Birch Bay, Sudden Valley Provisional Urban Growth Area, and the Columbia Valley/Kendall area as county urban growth areas, not associated with existing cities.

**Element** \_\_\_\_\_ Policy Choices

**Land Use (1 of 2 –)** Whatcom County has adopted an approximately 40-acre planned light impact industrial designation within the Columbia Valley UGA as shown on map ???. The County may designate another 40-acres of land for UGA/light impact industrial development within the boundaries of the potential planned light impact industrial designation only if the initial 40 acres in the planned light impact industrial designation is either substantially put to use for industrial purposes or is removed from the UGA/planned light impact industrial designation by amending the Foothills Subarea Plan and the Whatcom County Comprehensive Plan. In any case, the County's intent is to meter the amount of land available for light impact industrial uses to match demand and to avoid designating more land than necessary for light impact industrial development.

*Note: Approved by consensus of the committee on 6/27/07; however, please note the supplemental minority vote at the same meeting on the following Policy Choice.*

*Staff Comment to Studio Cascade: Please insert the appropriate map # at the end of the 1st sentence.*

**Land Use (2 of 2)** Recognize the need for light impact industrial land uses within and/or bordering on the Columbia Valley Urban Growth Area. Consider establishing a light impact industrial zone within the long term planning area located on the north side of Limestone Road as shown on the Planned Light Impact Industrial and Potential Planned Light Impact Industrial map. Retain the existing zoning within this long term planning area until a master plan has been completed to identify traffic impacts and infrastructure/utility/service needs, and appropriate mitigation measures have been identified. Consider modifying the Columbia Valley UGA boundary in appropriate locations north and west of the existing UGA to allow for the allocation of only light impact industrial land in sufficient acreage to attract and maintain business opportunities. Ensure the UGA is not expanded in acreage as a result of the modification. Assure an adequate supply of light impact industrial sites to meet future market demands for light impact industrial development.

*Note: This policy (which is a modification of existing Policy 2AA-12) was initially approved by the committee on January 17, 2007. It was modified by the committee on May 7, 2007, and June 27, 2007. It was given final approval by an 8-3 committee vote on June 27, 2007.*

*Staff Comment: Perhaps this policy should be moved from the County-wide Comprehensive Plan into the Foothills Subarea Plan.*

**VI. At the September 8, 2007 meeting,** the Foothills Advisory Committee made the following Decisions and Recommendations:

**Clustering in Rural Zones** - The Committee recommended, by a 5-3 vote, to modify an implementation task in Chapter 15 of the Preliminary Draft Foothills Subarea Plan (August 2007) as follows:

Amend the zoning code to prohibit clustering in Rural and Rural Forestry zones except in the Agriculture Protection Overlay District. (Source: 1988 Subarea Plan Subcommittee – Final Recommendations, June 26, 2007)

**VII. At the September 19, 2007 meeting,** the Foothills Advisory Committee made the following decisions and recommendations:

- 1. Planned Urban Residential Designation & Policy** - The Committee recommended, by a 5-3 vote with 2 committee member abstaining, to establish a Planned Urban Residential Comprehensive Plan map designation as shown on the attached map, and an associated policy to:

**CV1-F** Support rezoning the Planned Urban Residential comprehensive plan designation within the Columbia Valley UGA from Rural Forestry to Urban Residential 4 dwellings/acre (UR-4).

*(Note: this decision changed the zoning of the 40 acre Holly and Associates/ S.C. Goshen site from Rural Forestry to UR4.)*

The attached "Columbia Valley UGA and Adjacent Lands" map supersedes and replaces the map previously approved by the Committee and attached to the Record of Decisions & Recommendations for the 6/27/07 meeting.

- 2. Concurrency Policy** – The Committee recommended, by a 6-3 vote with 1 committee member abstaining, to delete the following policy:

**LU11-F** All statutory and regulatory concurrency requirements must be met at the same time as the issuance of any building permit.

November 28, 2007- Hand delivered to Planning Commission

**Analysis by Minority Committee Members of Foothills Subarea Population Projections:**

**1. MAJORITY MEMBERS OF Foothills SUBAREA CITIZENS ADVISORY COMMITTEE RECOMMENDED POPULATION PROJECTIONS**

COMMUNITY	2007 POPULATION ESTIMATE *	2027 POPULATION FORECAST **	INCREASE IN POPULATION	PERCENTAGE CHANGE
Columbia Valley UGA/Kendall	3,853	7,053 (between Baseline and High)	3,200	83%
Glacier	284	397 (High)	113	39.78%
Maple Falls	213	254 (Baseline)	41	19.24%
Deming	220	262 (Baseline)	42	19%
Remainder of Subarea	2,152	3,004 (High)	852	39.5%

\* Source: On 12/6/06 the Subarea Committee adopted 2006 (2007) population estimate, by consensus.

\*\* Source: Subarea Committee Record of Decisions 12/06 – 2/07

**2. ECONORTHWEST RECOMMENDED POPULATION PROJECTIONS**

COMMUNITY	2007 POPULATION FORECAST	2027 POPULATION FORECAST ***	DIFFERENCE	PERCENTAGE CHANGE
Columbia Valley UGA/Kendall	3,853	6,483 (Baseline)	2,630	49%
Glacier	284	338 (Baseline)	54	19%
Maple Falls	213	254 (Baseline)	41	19.24%
Deming	220	262 (Baseline)	42	19%
Remainder of Subarea	2,152	2,563 (Baseline)	411	19%

\*\*\* Source: see page 10, Table 6, of 12/1/06 EcoNorthwest Foothills Subarea Population Forecast

### 3. COMPARISON OF ECONORTHWEST'S TO MAJORITY'S PROJECTIONS

COMMUNITY	ECONORTHWEST'S GROWTH PERCENTAGE CHANGE 2007-2027	MAJORITY'S GROWTH PERCENTAGE CHANGE 2007-2027	DIFFERENCE BETWEEN ECONORTHWEST AND MAJORITY	PERCENTAGE DIFFERENCE BETWEEN ECONORTHWEST AND MAJORITY
Columbia Valley UGA/Kendall	49%	83%	34%	<b>69% higher than EcoNorthwest's</b>
Glacier	19%	39.78%	20%	<b>200% higher than EcoNorthwest's</b>
Maple Falls	19.24%	19.24%	0	0
Deming	19%	19%	0	0
Remainder of Subarea	19%	39.5%	20%	<b>200% higher than EcoNorthwest's</b>

Based on the above analysis, we strongly urge that the Majority choice of targeted 2027 populations for the UGA, Glacier and the Remainder of the Subarea be denied.

### 4. GENERAL QUESTION AND CRITICISM- GROWTH RATE FOR SMALL TOWNS AND REMAINING SUBAREA (EXCLUSIVE OF THE COLUMBIA VALLEY UGA)

EcoNorthwest's decision (found on page 11 of EcoNorthwest's December 1, 2006 Memo on Foothills Subarea Population Forecast) to use its 2002 'other unincorporated' growth projection rates (as included in the May 2002 Whatcom County Population and Economic Forecasts) for the small towns (exclusive of the Columbia Valley UGA) and for the remaining subarea, is not appropriate. The 'other unincorporated' geographical area of Whatcom County includes communities which are far larger than any in the Foothills. The inclusion of those communities' growth rates will inappropriately skew the calculation of growth projection rates for the Foothills Subarea.

By way of example, including Sudden Valley is inappropriate. During the period 2000 to 2007 it had a 32.56% growth change. However, during that same period, the Census Designated Places in the Foothills Subarea (exclusive of the population estimates for the Columbia Valley UGA, Glacier and Maple Falls) had far lower growth rates per the WA State Office of Financial Management Small Area Estimates Program (SAEP) September 13, 2007 Version. Deming's growth change was 1.46%; and Kendall's growth change was 4.17%, nowhere near the 32.56% of Sudden Valley. Even the Columbia Valley UGA only had a rate of 9.32%. Therefore, the EcoNorthwest growth rates are not targeted for the Foothills Subarea small towns and remaining subarea..

Particularly in light of EcoNorthwest's acknowledgement on Appendix B of the December 1, 2006 Memo, of the inherent limitations of small data projections, it is inappropriate to fail to determine more appropriate growth rates for the small towns and the remaining subarea. In all

likelihood, the revised projection rates would be much lower, and thus there would be an even greater discrepancy between the growth rates adopted by the Majority and any revised more accurate projection rates.

## **5. GENERAL QUESTION AND CRITICISM – GROWTH RATE FOR COLUMBIA VALLEY UGA**

EcoNorthwest utilized the same growth projection rates for 2007-2027 for the Columbia Valley UGA in its December 1, 2006 Memo (found on page 11 of the December 1, 2006 Memo) as EcoNorthwest utilized in its 2002 Report of Population and Economic Forecasts (found on page 3-10 of the 2002 Memo). This decision is troubling. Five years later, EcoNorthwest is using the same growth projection rates as they did in 2002, notwithstanding that OFM has issued, effective September 13, 2007, SAEP historical population numbers for 2002-2007. EcoNorthwest's own report, on pages 3-5 and 3-6 of its 2002 Report states that yearly numbers do in fact make a significant difference. *"In fact, it is the annual variations in growth that urban areas experience that provides us with the most information upon which to base our forecasts for the future."* Therefore, these yearly numbers should have been utilized by EcoNorthwest.

The OFM SAEP population numbers for 2002-2007 show a percent change in population from 2002- 2007 of approximately 5.84% whereas EcoNorthwest's percent change in population from 2002- 2007 is 17%. (Please note that for purposes of this discussion we used the period 2002-2007 for OFM numbers so as to make a direct comparison to the EcoNorthwest numbers presented in its December 1, 2006 Memo for that time period, rather than the period 2000-2007 discussed in Section 4 above in this analysis.)

Even recognizing that there is a difference in starting population numbers between those as adjusted and chosen by the Subarea Committee and those starting population numbers reported by the US Census 2000 for the UGA, the numbers all relate to the Peaceful Valley CDP:

- the EcoNorthwest 2002 Memo (found on page 3-5), shows that the 2000 Columbia Valley UGA base population was 2490;
- the EcoNorthwest 2002 Memo (found on page 3-10, Table 3-4), showed growth rates for the Columbia Valley UGA as 3.4% for 2002-2007, 3.0% for 2007-2012, 2.6% for 2012 -2017 and 2.1% for 2017-2022;
- the EcoNorthwest 2006 Memo (found on page 11) showed growth rates for the Columbia Valley UGA as 3.4% for 2006-2007, 3.0% for 2007-2012, 2.6% for 2012 - 2017 and 2.1% for 2017-2027;
- the EcoNorthwest 2002 Memo (found on page 3-5, Table 3-2) showed that the 2000 population of the Columbia Valley UGA was 2490; and
- the OFM 2007 SAEP information showed that the 2000 population of the Peaceful Valley CDP was 2448.

Peaceful Valley CDP includes Paradise Lakes (because there are in only 1144 residents in Peaceful Valley, based on 368 water connections (as of 2007) and household density of 3.11, leaving an additional 1,304 residents of the Peaceful Valley CDP who do not live in Peaceful Valley. The CDP thus appears to encompass the Columbia Valley UGA.

Regardless of the starting population numbers, the growth rates apply to the same community. There should not be such a discrepancy between the growth rates. OFM's 2007 5.84% rates should have been utilized by EcoNorthwest rather than out-of-date rates, with a consequent result that the growth projection rates for 2007-2027 should be revised downward.

## **6. CONCLUSION.**

We urge that the population analysis by the Majority Committee Members of the Subarea Committee be revoked. We also urge that the EcoNorthwest projections at a minimum be revisited for both the UGA rates and the rates for the small town and remainder of the Subarea. We also suggest that review of Professor John McLaughlin's critique of EcoNorthwest's projection methodology would be appropriate before final growth rates are chosen for the Foothills Subarea.

Thank you for your consideration.

Sincerely,

Jan Eskola, Member at Large  
Amy Mower, Representative of Maple Falls  
Cynthia Purdy, Representative of Deming

**WHATCOM COUNTY SAEP INFORMATION AS OF SEPTEMBER 13, 2007**

THE FOLLOWING INFORMATION IS AN EXTRACTION FROM THE WEBSITE FOR THE WA State Office of Financial Management Small Area Estimates Program (SAEP).

[http://www.ofm.wa.gov/pop/smallarea/data/xls/saep\\_cdp.xls](http://www.ofm.wa.gov/pop/smallarea/data/xls/saep_cdp.xls)

Estimates of Total Population for Census 2000 Census Designated Places.

All SAEP estimates are subject to change due to data updates and revisions.

Current year estimate marked as 'Provisional' because most data updates occur the first year.

2000 Census Place Name	2000 Census Place Code	SAEP Version	Census 2000 Population Count	2001 Population (Estimate)	2002 Population (Estimate)	2003 Population (Estimate)	2004 Population (Estimate)	2005 Population (Estimate)	2006 Population (Estimate)	2007 Population (Provisional Estimate)	Change in Population 2000 to 2007	Percent Change in Population 2000 to 2007
Acme CDP	00275	September 13, 2007	263	266	266	264	263	261	262	263	0	0.08%
Birch Bay CDP	06190	September 13, 2007	4,961	5,171	5,441	5,739	6,091	6,465	6,800	7,128	2,167	43.68%
Blaine city	06505	September 13, 2007	3,770	3,855	3,975	4,025	4,115	4,240	4,480	4,650	880	23.34%
Custer CDP	16375	September 13, 2007	299	301	304	303	308	306	305	306	9	3.17%
Deming CDP	17495	September 13, 2007	210	212	214	213	213	213	210	213	3	1.46%
Everson city	22745	September 13, 2007	2,035	2,050	2,015	2,030	2,055	2,080	2,135	2,165	130	6.39%
Ferrdale city	23620	September 13, 2007	8,758	8,918	8,918	9,148	9,298	9,743	10,273	10,539	1,775	20.27%
Glacier CDP	26875	September 13, 2007	90	97	119	143	154	190	291	315	225	249.50%
Kendall CDP	35135	September 13, 2007	158	166	166	165	163	161	159	165	7	4.17%
Lynden city	40805	September 13, 2007	9,020	9,285	9,284	9,644	9,914	10,383	10,653	11,053	2,033	22.54%
Maple Falls CDP	43010	September 13, 2007	277	302	311	313	318	315	328	339	62	22.21%
Marietta-Alderwood CDP	43491	September 13, 2007	3,594	3,662	3,707	3,683	3,681	3,683	3,649	3,665	71	1.97%
Nooksack city	49275	September 13, 2007	863	918	920	902	910	970	1,004	1,075	212	24.57%
Peaceful Valley CDP	53800	September 13, 2007	2,448	2,500	2,525	2,543	2,552	2,558	2,601	2,676	228	9.32%
Sudden Valley CDP	68200	September 13, 2007	4,165	4,266	4,384	4,481	4,724	4,899	5,225	5,521	1,356	32.56%
Sumas city	68330	September 13, 2007	960	995	1,007	1,002	1,079	1,112	1,125	1,191	231	24.06%

**Table 3-2. Whatcom County urban and rural areas historical population and growth rate estimates, 1990-2000**

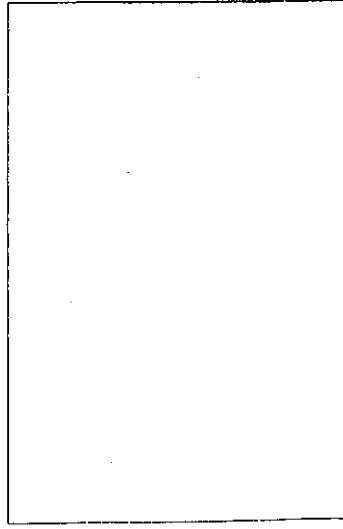
Urban Area	Historical Population		Average Annual Growth Rate	Share of Growth
	1990	2000		
Bellingham	61,250	78,040	2.5%	43.0%
Blaine	3,538	4,779	3.1%	3.2%
Everson	1,761	2,256	2.5%	1.3%
Ferndale	6,986	9,934	3.6%	7.6%
Lynden	6,453	9,604	4.1%	8.1%
Nooksack	616	895	3.8%	0.7%
Sumas	792	995	2.3%	0.5%
Columbia Valley	7,780	11,480	5.1%	5.2%
Point Roberts Rural Area	923	1,308	3.5%	1.0%
Birch Bay UGA	2,283	4,532	7.1%	5.8%
Other Unincorporated Areas	42,707	51,981	2.0%	23.8%
<b>Total</b>	<b>127,780</b>	<b>166,814</b>	<b>2.7%</b>	<b>100%</b>

*How Break out from South Fork?*

Source: ECONorthwest analysis of U.S. Census Bureau Census 2000 and Census 1990 data.

As Table 3-2 illustrates, during the fast-growth period of the 1990s, the three unincorporated communities of Columbia Valley, Birch Bay, and Point Roberts experienced higher annual growth rates than did any of the city-centered study areas. In terms of shares of growth, however, the areas of the three most populous cities of ~~Bellingham, Ferndale, and Lynden~~ accounted for nearly 60% of the County's total growth for the ~~period~~.

While it is useful to talk about annual changes in population in terms of decade-long "averages," it is important to note that, in fact, most cities' population changes generally do not occur in anything that remotely resembles a steady pace. As an illustration of this point, Figure 3-2 shows the annual changes in population for the three Whatcom County cities of Ferndale, Lynden, and Blaine (excluding population changes that occurred as a result of annexations). As Figure 3-2 illustrates, changes in population for a given city tend to vary widely from year to year.



**Table 3-4. Baseline urban area growth forecasts, 2002 to 2022 (cont.)**

	<b>Average annual growth rates</b>			
	<b>2002-2007</b>	<b>2007-2012</b>	<b>2012-2017</b>	<b>2017-2022</b>
Bellingham	1.7%	1.6%	1.4%	1.3%
Blaine	1.4%	1.4%	1.3%	1.1%
Everson	2.1%	2.2%	2.1%	2.1%
Ferndale	2.5%	2.2%	2.0%	1.8%
Lynden	2.8%	2.5%	2.2%	1.9%
Nooksack	3.2%	3.3%	3.2%	3.2%
Sumas	2.0%	2.0%	2.0%	1.9%
Columbia Valley	3.4%	3.0%	2.6%	2.1%
Point Roberts	1.4%	1.4%	1.2%	1.1%
Birch Bay	2.2%	2.1%	1.8%	1.6%
Other Uninc.	0.9%	0.9%	0.9%	0.8%
<b>Total</b>	<b>1.6%</b>	<b>1.5%</b>	<b>1.4%</b>	<b>1.3%</b>

Source: Washington State Office of Financial Management, Economy.com, ECONorthwest analysis.

Figure 3-3 and Figure 3-4 provide a graphic illustration of our forecasts for the ten study areas and the remaining portion of the unincorporated area. Figure 3-3 shows all eleven forecasts, highlighting the dominant role of Bellingham and "other" unincorporated Whatcom County as drivers of County growth. Figure 3-4 excludes the forecasts for Bellingham and the "other" unincorporated area to allow a closer look at forecasts for the nine remaining urban areas.

**Table 6. Range of forecasts of population in the Foothills Subarea and selected areas, 2017 and 2027**

	Columbia Valley / Kendall UGA	Glacier	Maple Falls	Deming	Remaining Subarea	Total Population
<b>Low Growth Assumption</b>						
2006	3,853	284	213	220	2,152	6,722
2017	4,602	300	225	233	2,274	7,633
2027	5,270	314	236	244	2,381	8,445
<b>Baseline Growth Assumption</b>						
2006	3,853	284	213	220	2,152	6,722
2017	5,248	313	235	243	2,372	8,411
2027	6,483	338	254	262	2,563	9,900
<b>High Growth Assumption</b>						
2006	3,853	284	213	220	2,152	6,722
2017	6,382	340	255	263	2,575	9,815
2027	9,084	397	297	307	3,004	13,090

Source: Whatcom County Assessor; calculations by ECONorthwest

Table 7 shows the growth rates that ECO used to project growth in the Foothills Subarea, which were developed by ECONorthwest for Whatcom County in the report "Whatcom County Population and Economic Forecasts" from May 2002. ECO used the growth rates presented in the 2002 report, rather than develop new growth rates, for several reasons:

- The market factors, including supply and demand, have not changed enough to suggest the need for an adjustment of the growth rate assumptions.
- The growth rates in the 2002 report were the product, in part, of a discussion about public policy choices that will affect population growth in the County. Again, the County's public policies have not changed enough to warrant a change in growth rate assumptions.
- As a result of market factors and the County's policy choices, Whatcom County will continue to offer economic opportunities and a desirable and affordable living environment, which means that migration to the County is likely to continue driving population growth.

**Table 7. Growth rates for the Foothills Subarea and selected areas, 2017 and 2027**

	2006 to 2007	2007 to 2012	2012 to 2017	2017 to 2027
<b>Rural and small town growth rates</b>				
Low	0.6%	0.5%	0.4%	0.5%
Baseline	0.9%	0.9%	0.9%	0.8%
High	1.9%	1.7%	1.5%	1.6%
<b>Columbia Valley / Kendall UGA growth rate</b>				
Low	2.2%	1.8%	1.4%	1.4%
Baseline	3.4%	3.0%	2.6%	2.1%
High	6.8%	5.1%	3.9%	3.6%

Source: ECONorthwest

ECO used the growth rate for the Columbia Valley that was presented in the 2002 report to forecast population for the Columbia Valley / Kendall UGA. For the small towns and remaining Subarea, ECO used the rate for "other unincorporated" parts of the County to forecast population growth. The growth rate for the Columbia Valley is higher than the growth rate for the unincorporated parts of the County.

Table 8 shows the share of the Foothills Subarea's population growth for the Columbia Valley / Kendall UGA and small towns in the Subarea. Table 8 shows that in each growth scenario, the share of population in the Columbia Valley / Kendall UGA grows faster than in the small towns or remaining Subarea. This makes sense because the Columbia Valley / Kendall UGA forecast used higher growth rates than the other parts of the Subarea.

**Table 8. Share of Foothills Subarea's population growth for and selected parts of the Subarea, 2017 and 2027**

	Columbia Valley / Kendall UGA	Glacier	Maple Falls	Deming	Remaining Subarea
<b>Low Growth Assumption</b>					
2006	57.3%	4.2%	3.2%	3.3%	32.0%
2017	60.3%	3.9%	2.9%	3.0%	30.6%
2027	62.4%	3.7%	2.8%	2.9%	29.8%
<b>Baseline Growth Assumption</b>					
2006	57.3%	4.2%	3.2%	3.3%	32.0%
2017	62.4%	3.7%	2.8%	2.9%	29.7%
2027	65.5%	3.4%	2.6%	2.6%	28.2%
<b>High Growth Assumption</b>					
2006	57.3%	4.2%	3.2%	3.3%	32.0%
2017	65.0%	3.5%	2.6%	2.9%	28.2%
2027	69.4%	3.0%	2.3%	2.7%	26.2%

Source: ECONorthwest

ECO suggests that the County use the Baseline Growth Assumption in the Foothills Subarea Plan. ECO expects the Foothills Subarea will continue to attract population growth because of the economic opportunities available in the County and high quality of life in the Subarea. Two demographic factors (presented in Appendix A) support this growth rate assumption: net

## APPENDIX B. ISSUES WITH SMALL AREA FORECASTS<sup>2</sup>

Planning implies forecasting. To use policies to change the future in ways that decision makers think their constituents would find beneficial, one must first have an idea of what could or is likely to occur in the absence of those policy changes.

Forecasting is usually better, and better received, if it is based on a model of how the world works. In the context of housing and economic development, that understanding must certainly include how households and businesses make decisions about where to locate, and what types of buildings to occupy.

In the context of land use and growth management, the main variables that one must forecast are population and employment, which are then used to forecast the demand for new built space (housing, offices, warehouses, retail stores, and so on). The demand for built space creates a derived demand for land on which to build that space.

The amount of land needed depends on the type and density of space that will be built to accommodate population and employment growth. The type and density of development will be a function of market factors (demand and supply conditions) and public policy (especially about density and infrastructure, but also about transportation, economic development, environmental protection, and so on). This function of forecasting is central to development of the Foothills Subarea Plan: it will allow the County to determine how much land to make available for different uses to accommodate 20 years of population and employment growth.

The main point is that (1) forecasting growth requires a consideration of many variables that interact in complicated ways, and (2) any forecast of a single future is bound to be wrong—there are many possible futures that are more or less likely depending on one's assessment of the likelihood of the assumptions.

Thus, in conjunction with the forecasts, it is useful to describe the limitations of small areas forecasts. Following is a discussion of why small area forecasts are highly uncertain:

- Projections for population in most cities and counties are not based on deterministic models of growth; they are simple projections of past growth rates into the future. They have no quantitative connection to the underlying factors that explain why and how much growth will occur.
- Even if planners had a sophisticated model that links all these important variables together (which they do not), they would still face the problem of having to forecast the future of the variables that they are using to forecast growth (in, say, population or employment). In the final analysis, all forecasting requires making *assumptions* about the future.
- Comparisons of past population projections to subsequent population counts have revealed that even much more sophisticated methods than the ones used in the study "are

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<sup>2</sup> This section builds from work previously completed by ECONorthwest.

often inaccurate even for relatively large populations and for short periods of time."<sup>3</sup> The smaller the area and the longer the period of time covered, the worse the results for any statistical method.

- Small areas start from a small base. A new subdivision of 200 homes in Seattle would have an on total population of 0.01%. That same subdivision in a community of 200 would increase the Columbia Valley / Kendall UGA's housing stock by more than 12%—and population by a similar percentage.
- Especially for small cities in areas that can have high growth potential (e.g., because they are near to concentrations of demand in neighboring metropolitan areas, or because they have high amenity value for recreation or retirement), there is ample evidence of very high growth rates in short-term; there are also cases (fewer) of high growth rates sustained over 10 to 30 years.
- Public policy makes a difference. Cities can affect the rate of growth through infrastructure, land supply, incentives and other policies. Such policies generally do not have an impact on growth rates in a region, but may cause shifts of population and employment among cities.

Because of the uncertainty associated with small area forecasts, many forecasts present ranges of future population. Cities have many reasons to use point forecasts: among the most important are projections of future revenues, need for infrastructure, and need for land. These factors provide sufficient rationale for cities to develop and adopt point forecasts. That fact, however, does not mean they are any more accurate.

In summary, the longer the forecast, the greater the potential that actual population growth will vary from the forecast. This implies that cities should closely monitor actual population growth so that either (1) plans can be modified to account for variations, or (2) policies can be implemented that increase the likelihood of achieving the population growth.

One final comment on forecasts: population forecasts are often viewed as "self-fulfilling prophecies." In many respects they are intended to be; local governments create land use, transportation, and infrastructure plans to accommodate the growth forecast. Those planning documents represent a series of policy decisions. Thus, how much population a local government (particularly cities) chooses to accommodate is also a policy decision. In short, the forecast and the plans based on the forecast represent the city's future vision.

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<sup>3</sup>Murdock, Steve H., et. al. 1991. "Evaluating Small-Area Population Projections." *Journal of the American Planning Association*, Vol. 57, No. 4, page 432.

## OFM Small Area Estimate Program (SAEP)

About the SAEP Estimates

Regional and Other Local Small Area Data

SAEP Estimates for 2000-2007

October 05, 2007

Small Area Estimate Program (SAEP) data for "September 13, 2007" are now available. These include April 1 estimates of population and housing for Census-based geographic areas such as tracts, legislative districts, and school districts. Estimates for other geographic areas such as Islands and Water Resource Inventory Areas are available as well.

The Census geographic areas used for the SAEP estimates represent Census 2000 geographic areas. This version of SAEP data was developed using the Census Bureau's 2006 Second Edition TIGER/Line Files. This version of TIGER includes spatially realigned streets and other features for ten Washington counties that have been updated through the MAF/TIGER Accuracy Improvement Project ([view map](#)). GIS users will see that features in the realigned counties more precisely match local government GIS data.

Users should note that OFM received updated building permit data for Spokane County. This resulted in the redistribution of population within the county. Nine of Spokane's 106 census tracts have changes of about 100 people when compared to data from the May 2007 data release.

I would personally like to thank everyone who has provided support and data for the project.

Sincerely,

**Mike Mohrman**

SAEP Project Lead

### **ABOUT THE SAEP ESTIMATES**

The Office of Financial Management produces population estimates for special districts and user-defined boundaries through its Small Area Estimate Program (SAEP). The SAEP tracks new and demolished housing units by structure type statewide. Changes to the housing stock are developed and distributed to census blocks using building permit data, assessor records, postal delivery statistics, and census data. Population estimates are derived from the current housing stock using decennial census-based occupancy rates and household size that have been adjusted based on other estimation information. These population estimates are available for public release at the block-group level. For more detailed information please see [Methodology.pdf](#).

**Please Note:** SAEP estimates are NOT the official state population estimates used for fund distributions or program management. Although population totals from the official estimates program are used to build SAEP estimates, the two programs differ on how population in annexed areas are treated. Therefore, population estimates from the SAEP and the state's **Official April 1 Estimates** program are unlikely to match below the county level.

The SAEP estimates are population approximations developed by spatial interpolation procedures described in **Interpolation.pdf**. The figures may be subject to census count error and/or modeling error. Estimates may not be directly comparable from year to year due to boundary, data, and methodology changes. Estimates for the current year undergo the most revision because more spatially precise geocoded building permits or assessor data replace less precise postal data when they become available.

Users need to be aware of the limitation of SAEP data. If users choose to calculate occupancy rates and persons per occupied housing unit ratios for their own purposes, they do so at their own risk. SAEP estimates are based on 2000 census data and controlled to OFM's official county/city population estimates. The numbers of total housing and occupied housing are distributed spatially and raked to meet the official OFM totals. In some cases, our methodology may exaggerate declines in occupancy rates and erroneously increase person per household ratios over time. OFM would like to further caution users of this information that trends in population and housing from the SAEP should not be used to develop long range forecasts for small areas. OFM recommends that long term growth expectations for small areas be consistent with long range county growth projections.

**Disclaimer:** By using these data the user agrees that the Washington State Office of Financial Management shall not be liable for any activity involving these data with regard to lost profits or savings or any other consequential damages; or the fitness for use of the data for a particular purpose; or the installation of the data, its use, or the results obtained.

## REGIONAL AND OTHER LOCAL SMALL AREA DATA

SAEP estimates are meant to provide a consistent set of small area data for statewide applications. SAEP estimates are not meant to replace regional council of government and other local estimate programs that are integrated with regional transportation and land use planning. County and regional planning agencies are able to make localized adjustments to their data that are difficult to implement on a statewide basis. If your analysis area is completely within the jurisdiction of your local planning agency we suggest you contact them for your data needs.

- **Puget Sound Regional Council** (King, Kitsap, Pierce, and Snohomish Counties)

■ **Thurston Regional Planning Council**

**ESTIMATES FOR CENSUS AREAS, 2000-2007**

Metadata Link	Estimates	GIS Files	Map
<b>American Indian Areas</b>	<b>Excel</b>	<b>Shapefile</b>	-
<b>Census Block Groups</b>	<b>Excel</b>	<b>Shapefile</b>	-
<b>Census Designated Places</b>	<b>Excel</b>	<b>Shapefile</b>	-
<b>Census Tracts</b>	<b>Excel</b>	<b>Shapefile</b>	-
<b>Public Use Microdata Areas (PUMA) - 1 percent</b>	<b>Excel</b>	<b>Shapefile</b>	-
<b>Public Use Microdata Areas (PUMA) - 5 percent</b>	<b>Excel</b>	<b>Shapefile</b>	-
<b>School Districts</b>	<b>Excel</b>	<b>Shapefile</b>	-
<b>School Districts (County Parts)</b>	<b>Excel</b>	<b>Shapefile</b>	-
<b>State Legislative Districts</b>	<b>Excel</b>	<b>Shapefile</b>	<b>Map</b>
<b>State Legislative Districts (County Parts)</b>	<b>Excel</b>	<b>Shapefile</b>	-
<b>Urban Areas</b>	<b>Excel</b>	<b>Shapefile</b>	-
<b>Urban Areas (County Parts)</b>	<b>Excel</b>	<b>Shapefile</b>	-
<b>ZIP Code Tabulation Areas, 5-Digit</b>	<b>Excel</b>	<b>Shapefile</b>	-
<b>ZIP Code Tabulation Areas, 5-Digit (County Parts)</b>	<b>Excel</b>	<b>Shapefile</b>	-

**ESTIMATES FOR OTHER AREAS, 2000-2007**

Metadata Link	Estimates	GIS Files	Map
<b>Selected Islands*</b>	<b>Excel</b>	-	-
<b>Water Resource Inventory Areas (WRIA)</b> Washington State Department of Ecology	<b>Excel</b>	<b>Shapefile</b>	<b>Map</b>

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