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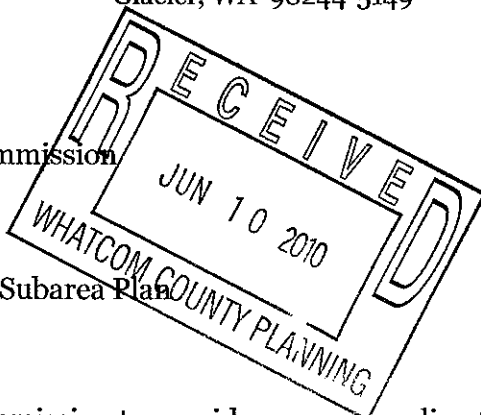
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June 10, 2010

Whatcom County Planning Commission  
5280 Northwest Drive  
Bellingham, WA 98226

Subject: Reject Foothills Subarea Plan

Dear Commissioners;



I urge the Planning Commission to consider recommending that County Council should abandon this "updated" Subarea Plan in its entirety.

The quality of this plan so poor on so many counts that I sincerely believe that the Foothills would be far better served if its planning were consolidated under the general Rural Elements section of the countywide Comprehensive Plan.

The GMA doesn't require this. The resolution that called for a Foothills Subarea Plan could be easily reversed by a new Council resolution.

I've observed the update process, and read every iteration of the plan as it sits before you tonight, closely over a period of five years. Beyond the recitals of history, comparisons to the County, etc. (and the development of many fine maps) the plan as a whole fails to accurately describe and analyze the area's true character and condition.

Much of this Subarea Plan has been predicated on the narrow opinions of a small group that was drawn from a very tiny "pool." The Planning Commission's experience regarding the community's reaction to this advisory committee's push to expand the Columbia Valley UGA was just a sample of the frustration the greater Foothills community has agonized with for five long years. Loaded with false and error ridden assumptions, the plan repeatedly ignores and refutes the results of the original "visioning" questionnaire. Most residents of the Foothills chose to live here, enjoy its distance from urbanity, and fiercely oppose its losing rural character. The vast majority of the Foothills has little want or need for hourly busses or community activity centers. Few want to walk or bike half a day from point to point 'between communities' for a meal or groceries. Yet goals such of these are the highest priorities of this plan.

Beyond the community's displeasure with the advisory committee, the "red-lined" March 31, 2010 edit reveals how extensively PDS *and* the Advisory Committee were forced to delete a large number of dubious and clearly misleading ECONorthwest data and exhibits from the 2007 Draft. Even with many errors withdrawn, the text of the plan continues to refer to (and incorporate) most of ECONorthwest's dubious work, by reference, in its text. Although some "facts" were withdrawn, virtually every assumption, conclusion, policy recommendation, and implementation plan item has remained -- virtually unchanged.

Removing *some* “offending” tables does not relieve the County of its responsibility to “show its work” and base its planning on defensible facts – that should reflect reality. This effort appears to have been incapable of field checking, or substantiating, data about employment and business figures for the Foothills, and particularly for the Columbia Valley UGA. ECONorthwest’s troubled “Foothills Subarea Economic Analysis” continues to be referred to throughout the entire plan, including the grossly misleading – and plan-driving claim – that the Foothills economy is dominated by government employment (that there is a lack of diversity in the economy). Local citizens have been forced to demand – and challenge – the Plan’s sections on transportation, water quality, and more. I agree with and support the “Minority Report,” and deeply respect those advisory committee members who could not, in good conscience, tolerate demands that they should sign 2007 Draft.

If this Subarea Plan is recommended by you and adopted by Council, a very inaccurate factual record will stand, and poor policy will inevitably result. The implementation section addresses vague and unsubstantiated public needs. The advisory committee didn’t concern itself with cost-benefit analysis of the list: how many will be served, how long ‘for,’ or at what cost. Not the advisory’s problem. To the best of my knowledge, not a single project suggested in a “colored dot” brainstorming exercise was ever removed from the original list. As a long term resident and taxpayer, I don’t think the community would welcome most of those projects, even if they were “free.” But your recommendation, and Council’s adoption, of this plan, could endorse them all for grants and other forms of funding. Many projects in this “draft” have already secured funding, as if they had been approved.

Much of the Foothills community felt that Council exhibited very odd judgment in continuing the Columbia Valley’s designation as a UGA when the Columbia Valley is clearly not a “city.” Every reference to the Columbia Valley in the Subarea Plan demonstrates that this unincorporated area with high residential density is not a city, and this UGA has never been “cut from whole cloth.” Despite ten years with the designation, the Columbia Valley UGA was unable to generate any retail or bona fide new commercial activity. Like the rest of the Foothills Subarea Plan, the Columbia Valley UGA “as a concept” is a fiction perpetuated by its authors.

In conclusion – again -- I sincerely believe that the Foothills would be far better served if its planning were consolidated under the general Rural Elements section of the countywide Comprehensive Plan. I urge you to consider recommending to Council that this Subarea Plan be rejected entirely.

Sincerely,



Deborah Ellen Baker  
Resident – since 1973