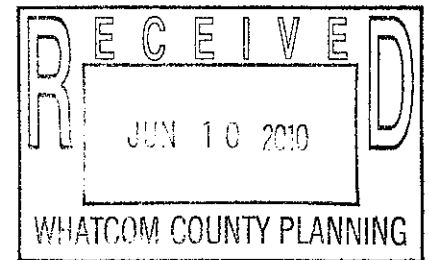


To: Whatcom County Planning Commission

Rabel Burge
Jeff Raney
Jean Melious
John Belisle
Gary Honcoop

Mary Beth Teigrob
Michelle Luke
Rod Erickson
John Lesow



June 10, 2010

Dear Whatcom County Planning Commissioners:

The Foothills Subarea Plan Advisory Committee (FSPAC) expended considerable time and effort into the research and deliberations on the Population Projections that were presented in the Chapter 1, Introduction and Population Projections, of the October 2007 Draft of the Foothills Subarea Plan. Obtaining the current population figures agreeable to all of the FSPAC members for each of the small towns, the Columbia Valley Urban Growth Area (CV UGA) and the rest of the Foothills was perhaps the most intensive of any of the tasks completed for the Draft Plan.

The 2006 Foothills Subarea population estimates* accepted by the FSPAC by consensus for the Draft Plan are as follows:

Columbia Valley UGA (including Kendall)	3,853
Glacier area	284
Maple Falls area	213
Deming Small Town	220
Remaining Foothills Subarea	<u>2,152</u>
Total:	6,722

*Table 1.1 -2006 Foothills Population Estimate, October, 2007 Draft Plan, Chapter 1, p. 3

The Advisory Committee then proceeded to project the Foothills Subarea population for a 20-year planning period ending in 2027 based on Population Forecasts completed by ECONorthwest. This Population Forecast** task was completed on February 21, 2007 and the figures are as follows:

Columbia Valley UGA (including Kendall)	7,053
Glacier area	397
Maple Falls area	254
Deming Small Town	262
Remaining Foothills Subarea	<u>3,004</u>
Total:	10,970

**Table 1.6 Foothills Subarea Plan Adopted Population Forecast, October, 2007 Draft Plan, Chapter 1, p. 8

In the Whatcom County Council meeting of November 24, 2009, action was taken by Council to place a population cap of 5,000 on the CV UGA. That evening, PDS Director Stalheim explained that the cap was necessary to have capital facilities in place before any additional population could be allocated. He said that once capital facilities were addressed the cap figure would be revisited.

We strongly encourage the revisiting of the population cap of 5,000 for the CV UGA during the upcoming 2011 UGA review for the following reasons:

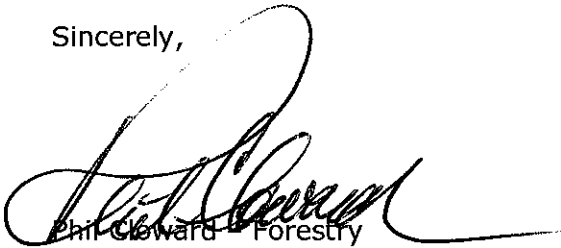
- The growth rate of the CV UGA from 1990 - 2008 was the highest in Whatcom County at 12.5%, according to the Berk and Associates memo of 1/13/09. No other UGA was even close.

The Growth Management Act requires the availability of affordable housing and the CV UGA may contain the greatest opportunity in the Whatcom County for families to purchase a home at reasonable prices. With the increasing need for affordable housing, the CV UGA is likely to continue its growth, though perhaps at a somewhat lower rate, during the 20-year planning horizon. The 1,147 population margin the cap allows will certainly be surpassed.

- The 5,000 figure is not based on any of the population estimates developed by the FSPAC or the forecasts generated by the ECONorthwest studies. The low growth estimate by ECONorthwest for the CV UGA in 2027, for instance, was 5,270 (Source: Table 1.5, ECONorthwest Population Forecasts, Draft Plan, Chapter 1, p. 7). It appears that figure was selected to allow time for service providers to complete their Capital Facilities Plans.
- This arbitrary estimate will result in inadequate planning for necessary infrastructure and services to support a growing population, should the cap remain unchanged. The service providers in the CV UGA, Water Districts 13 and 19 and Fire District 14, are currently working with community residents on their 20-year Capital Facilities Plans. Commission members will need accurate projections in order to adequately provide for future growth.
- There is no penalty for over-planning. When population growth doesn't meet projections, capital facilities and services can be simply curtailed or delayed. Adopting artificially low population estimates doesn't actually reduce growth, but such action risks overburdening the existing support systems. Overburdening of existing systems has been standard practice in the CV UGA since 1999.

It's time to plan realistically with the most accurate projection of future population growth. The most accurate population estimate for the CV UGA is the FSPAC recommendation of 7,053 and we urge adoption of that figure during the 2011 UGA Review.

Sincerely,



Phil Cloward - Forestry



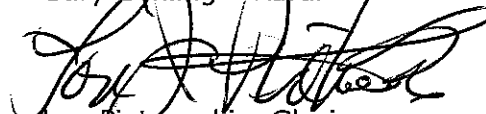
Norma Otto - CVUGA



Richard Banel - Business Community



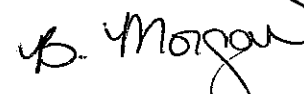
Gary Gehring - Rural



Lou Piotrowski - Glacier



Gerald Kern - CVUGA



Beth Morgan - CVUGA