

January 26, 2009

Dear Whatcom County Planning Commission:

I own 80 acres in the Columbia Valley UGA. I filed an application with PDS to convert the property from long-term to short-term and to change the zoning to UR-4 in June, 2006. As of 2009, there has been no decision on my request.

My land is arguably the best and most logical place for development in the UGA. Our wetland studies found no issues, we are in a water and sewer district and it is abutted on two sides by current development. Matt Aamot can identify the property—I also pointed it out during public testimony at the last commission meeting.

I am pleased PDS recommended retaining the UGA. I concur for the following reasons:

- The current comprehensive plan supports the UGA designation
- The Foothills Advisory Committee recommends retention of UGA
- PDS recommends retention of UGA
- The SEIS has identified **NO ADVERSE ENVIRONMENTAL IMPACTS THAT CAN NOT BE MITIGATED**
- Our research shows that removing the UGA is in violation of the GMA

I am against the PDS recommendation to freeze population projection for 2031 at the 2022 projection of 5,000 residents for the following reasons:

- The population growth in the Columbia Valley UGA increased 12.5% from 1990 – 2008. **This was the highest rate in Whatcom County.** Birch Bay was 2nd with 4.9%, Nooksack was 3rd with 3.5% and Lynden was 4th with 3.3%. (source: Berk and Associates memo dated 1/13/2009). Despite that, PDS recommends **REDUCING** the Whatcom County Comp plan population projection by 39% (using the same 5,000 2022 projection for 2031) **even though the Columbia Valley growth was more than double any other UGA in the county.**
- Adopting intentionally inaccurate projections will result in under planning for necessary services and infrastructure to meet actual demand. Adopting lower numbers won't reduce population growth, it will simply existing systems due to under planning for adequate capacity. We need realistic capital facilities planning, not planning based on artificially reduced population projections.

According to the PDS staff memo to you, using these artificially low population numbers can result in my 80-acres being removed from the UGA. **This will cause significant harm to my family, partners and me. We have worked with the county and invested in good faith. Removing my land from the UGA would be devastating and is, I believe, a violation of law.**

Please do not allow PDS to use these numbers to create a new policy in the Columbia Valley. Any allocation policy decision should come after realistic population projections have been addressed; Not before. The GMCC is reviewing this now, and either-actual historical growth or the Foothills advisory population projections should be used.

Thank you for your time and willingness to study the facts in the Columbia Valley UGA and to do your best to make a good planning recommendation.

Sincerely,

Jack Hovenier