

January 15, 2009

Whatcom County Planning Commission
c/o Ms. Becky Boxx
Whatcom County Planning and Development Services
5280 Northwest Dr.
Bellingham, WA 98226

RE: Foothills Subarea Plan Update

Dear Commissioners:

I would like to submit the following comments regarding the update of the Foothills Subarea Plan and rural element of the Comprehensive Plan.

1. Commercial and Industrial Uses in the Foothills Subarea will have a positive effect on the quality of life there.

Reviewing the comments and responses concerning the draft SEIS I would ask that you consider the need for commercial and industrial zoning and uses in the foothills area. I realize that it is a difficult position to be in as some Foothills residents can be very vocal about their opposition to growth of any kind. While we all appreciate the need to preserve rural character, it should not be overlooked that there is an existing population of 6,700 residents in the subarea. More than half of these live in the Columbia Valley. To eliminate the UGA designation in the Columbia Valley would be a huge detriment to the citizens and the quality of life in the area. It would forever leave the residents of the Columbia Valley isolated from the types of services that are normally associated with higher density residential areas.

Issues of transportation, pollution, environmental impacts, safety, etc. related to growth are exacerbated by the lack of services to the area. This sounds counterintuitive – how can providing urban services reduce environmental impacts and pollution? Having worked for Whatcom County as a land use planner, and now working a private land use consultant I am familiar with the challenges with developing commercial or industrial land outside of a UGA. Development without urban services requires large holding tanks for fire flow storage, large areas for well protection zones, large areas for on-site sewage disposal systems, etc. Without these services the Columbia Valley will remain an isolated problem area, home to an above average crime rate, drug use, and lack of employment opportunities. Providing areas that are zoned commercial and industrial, and serving those areas with municipal style water and sewer services reduces impacts to the environment, allowing for planned and concentrated growth with considerations to all

aspects of development. Without this type of proper planning the area will develop haphazardly at the expense of the environment, and the health and safety of the residents. Ignoring the problem and removing the UGA designation would be a knee-jerk reaction to the problems currently facing the area.

2. Employment:

The Comprehensive Plan encourages employment opportunities in the Foothills Subarea, which makes sense from a planning perspective – i.e. one of the smart growth's foundations is to locate residential uses in close proximity to employment and service centers to reduce transportation, pollution, and infrastructure costs. To remove the UGA designation at this point would leave the area without the ability to bring in the services and other uses necessary to provide employment opportunities. Again, even under the LAMIRD option, zoning like this may be retained, but the possibilities for providing significant employment opportunities will be hindered due to the difficulties with non-UGA development.

3. The Kendall Small Town Master Plan must be in a UGA or at the very least a LAMIRD to become a reality.

The Kendall Small Town Master Plan is a good idea, as it is in a logical location for the uses proposed in the update. However, should this area be removed from UGA designation as recommended in the Subarea Update, or if it is excluded from a LAMIRD designation as shown under alternative 3 in the Final SEIS, realization of the Kendall Small Town Master Plan will not be possible. As discussed earlier, uses such as grocery stores, restaurants, and other tourist/service/retail related activities must have water, both potable and for fire flow purposes, and if not public sewer then large areas of land for on-site sewage disposal systems. If you recommend the Kendall Small Town Master Plan as part of the Subarea Plan update, then I strongly suggest that the UGA designation be retained at this intersection, or at the very least retain a LAMIRD designated in this area. A LAMIRD designation should contain an area as large as may be allowed under RCW 36.70A.070(5)(d)(iv) in order to accommodate the infrastructure necessary to develop as envisioned in the Subarea Plan.

Aerial photographs of the Kendall Rd./Mt. Baker Highway intersection are not available in the 1991 photo series at the Northwest Annex. However the 1986 photos show several structures near the intersection prior to the July 1, 1990 cutoff for LAMIRD's. Thus the County clearly has the ability to retain at least a LAMIRD designation here. To remove the intersection from the UGA and not designate it a LAMIRD would eliminate the potential for providing even basic commercial/tourism related services as envisioned in the current and proposed Subarea Plan.

4. Removing UGA designation is not consistent with the GMA.

According to the GMA, urban growth areas are supposed to be in areas that are already characterized by urban levels of development (RCW 36.70A.110(3)). The residential density in the Columbia Valley is certainly indicative of urban density. It is logical, and from a planning perspective a benefit to allow the residents of the area to shop, work, and run errands in their own neighborhood and not have to drive to Bellingham. To deny them this ability would be a disservice to the Foothills residents, and will perpetuate the problems associated with under serviced high density residential areas.

5. Glacier

Like the Kendall area, Glacier is a logical and practical area to accommodate commercial (mostly tourism related) development. With ample water supply from the Glacier Water District, and limited wetlands in the area, Glacier is a good candidate for the tourist commercial uses contemplated in the existing and proposed Subarea Plan. Reduction of the Resort Recreational Subdivision boundary in the Glacier-Snowline area as proposed in Alternative 3 of the Final SEIS would forever eliminate this area from use as a tourist commercial, service oriented destination as anticipated in the current and proposed Subarea Plan. The area (SE of SR542) is already home to an RV park, condominiums, three Chalet style homes and was home to the Chandelier restaurant until it was destroyed by fire in 1998. The access points on SR542, the cleared parking areas, and on-site sewage disposal systems that once served the Chandelier are still on site. As such there is a clear pattern of tourism/commercial use in this area and it would be an irreversible and impractical change in land use to remove the current zoning and comprehensive plan designations from this area.

Thank you for considering my comments.

Sincerely,

Jay H. Irwin