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CC: Seth Fleetwood <sfleetwo@co.whatcom.wa.us>, Pete Kremen <PKremen@co.what...
Date: 1/22/2009 2:54 PM
Subject: Draft Foothills Subarea Plan

Dear Honorable Planning Commissioners,

After the Public Hearing on January 15th I reviewed the Phase 1 Allocations of 2031 Growth to Planning Areas Report, dated January 13, 2009, prepared by Berk & Associates for the Whatcom Comprehensive Planning Team.

I am surprised and troubled by two sets of numbers utilized by the Report.

First, the population projection for 2031 growth in the Columbia Valley, is set to be either 7,228 under the Historical Share Scenario or 6,154 under the Current Comp Plan Scenario, notwithstanding that the PDS Staff Report to the Planning Commission on the Draft Foothills Subarea Plan dated January 8, 2009 recommends a projection of 5,000 for the 'planning period'.

The Berk Report suggested allocations are either approximately 50% or 20%, depending upon the alternative scenario, over the PDS Staff Report projection of 5,000. Those increases in population would occur between 2029 and 2031, and seem highly unlikely to occur in two years. Please note that the Staff Report does not indicate if the planning period is 2029 or 2031, although it discusses the need to adopt the proposed amendment date for the planning period to be utilized in the County Comp Plan when amended in June 2009. Regardless, the population increase would be a huge jump in 2031 if the planning period is 2029, and just plain incorrect if the planning period is 2031.

The inconsistency between the PDS Staff Report and the GMCC Berk & Associates Report is quite disturbing since the PDS has represented that they are responsible for all numbers submitted to the GMCC and its consultants for the Foothills Subarea and the Columbia Valley UGA. Therefore, of course, PDS is involved with the Berk & Associates Report.

There are two problems: 1) the discrepancy in population projection, which will impact the work by the GMCC as the discrepancy will need to be allocated to some other part of the County; and 2) the lack of full disclosure to the Planning Commission and to the public for the Public Hearing, of this GMCC report on the population projection. This missing information will certainly have an impact on the Planning Commission's decisions, and has led to incomplete public participation process. I have asked Seth Fleetwood, as one of the County representatives to the GMCC to address the first issue with the GMCC. I ask you, as Planning Commissioners, to vote that the information in the Staff Report be the final determining information for decisions on the Draft Subarea Report, rather than the information in the Berk & Associates Report. I urge that the GMCC's allocation process utilize the information from your votes rather than the Berk & Associates Report. Theoretical and conceptual proposals have a way of becoming cast in stone, and if that occurred here, then the efforts by the Planning Commission will be for naught.

I urge that if nothing else changes, then the 5,000 projection should control for all the reasons set out in the Staff Report, but if the GMCC, the Planning Commission and the County Council choose to adopt the WA Office of Financial Management's low projection for the entire County of 219,000 +/-, then the projection for the Columbia Valley UGA should be reduced as would the allocations for other parts of the County.

Second, the employment projections on Exhibit 10 (Regional/Local) for

2031 growth in the Columbia Valley are truly astonishing. There is the threshold concern that the estimated 2008 employment exceeds not only the WA Employment Security Department's estimate of 44 jobs but also the estimate for the Subarea Committee by EcoNorthwest in their Economic Analysis dated June 2007 of 54 jobs. The Berk & Associates Report says that the UGA today has 90 jobs, in Exhibit 7. Berk & Associates say that LEHD data more correctly indicates that there should be 90 jobs in the UGA. On what is that based? LEHD data isn't available at a level of detail that could result in a correction of "44 jobs" to "90 jobs. I wonder also if there are 25 industrial jobs in the UGA today? The second and most critical concern is that the Berk projection, under Exhibit 10, contemplates a 10-fold increase in employment by 2031, from 90 to 840! The Exhibit 9 (Historical) for 2031 growth in the Columbia Valley of 39 additional employees is much more realistic given actual history.

To have such numbers in the Berk & Associates report, which are obviously sanctioned by PDS, is irresponsible and inappropriate. Not even Birch Bay, which has 5,292 estimated population today and currently has 436 employees, is projected to have as high a number of employees in 2031. Birch Bay is projected to have 739 employees in 2031, with a population of either 8,199 Historical Share or 9,836 Current Comp Plan versus the 840 employees projected for Columbia Valley with a population of either 7,228 Historical Share or 6,154 Current Comp Plan. The various statistical methods utilized, regression and linear analysis, simply do not track the reality in this situation for employment projections.

I would respectfully ask that you review these questions with the GMCC and with PDS, and have the population numbers revised to no more than the 5,000 indicated in the Staff Report, subject of course to the policy determinations hopefully to adopt a lower county-wide projection which would then lead to a number lower than 5,000 for the Columbia Valley UGA. As far as the employment numbers, those need to be reduced dramatically, as that UGA does not have the capital facilities to support an explosion in growth nor does the current economic situation, and the hoped for recovery, support such suggested explosion in growth.

Thank you for your consideration.

Sincerely,

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