

1/15/09

To: Whatcom County Planning Commission; Whatcom County PDS

This is a comment on the statement made in the foothills final SEIS, and again in PDS staff recommendations regarding the foothills sub-area plan, that WD 13 has 197 water hookups currently available.

Note that in appendix item 7 of the water and sewer chapter of the SEIS it is stated that WD 13 is currently updating its comprehensive and facilities plans, and that it is planning for an ability to serve 1622 residential customer equivalents within the 20 planning period. WD13 currently serves 379 connections, meaning that the district is planning for an additional 1243 connections.

Note that WD 13 is required, in accordance with the RCW, to serve growth within its service area and the WD13's service area encompasses all of the undeveloped land proposed for inclusion in the Columbia Valley UGA by the foothills sub-area plan committee.

Note that WD 13 has issued intent to serve letters to land owners in the UGA whose properties encompass all of the undeveloped land proposed for inclusion in the Columbia Valley UGA by the sub-area plan committee. These letters clearly indicate that WD13 anticipates having the ability to serve the properties within its service area.

Note that the current legal definition of water and sewer concurrency is that the facilities must only be in before a development is given final plat approval and not as a condition for preliminary plat approval or for potential development.

Therefore, the fact that WD 13 has a limited number of potential sewer connections currently available cannot be given as a rationale for restricting the size of the Columbia Valley UGA.

Submitted by
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