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Whatcom Chapter

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Whatcom County Planning Commission
Whatcom County Department of
Planning & Development Services
Bellingham, Washington 98226

Re: Futurewise Comments on Transportation Concurrency and Impact Fees

Futurewise strongly supports policies that account for the full costs of residential development in Whatcom County. We applaud the county for moving ahead with transportation impact fees. We do, however, have some concerns about the proposed amendments to the Comprehensive Plan and WCC Chapter 20.78. Specifically:

First, we believe the proposed impact fees are too low, and will therefore place a substantial burden on existing citizens who will continue to subsidize the transportation improvements needed to serve new residents and businesses. The consultant's report shows that only \$23 million of the approximately \$83 million to be spent on these capital projects will be recovered by impact fees (page 16). The proportion covered by TIFs appears even smaller when the total transportation requirements of \$435 million are considered. When viewed from this point, the TIFs will collect only 4% of projected costs.

Second, we are concerned that the relatively low fees set for development in rural areas fail to create incentives that would discourage sprawl. Fees in some rural areas, areas that would require many miles per trip, are generally lower (or equal to) TIFs charged by cities. We suggest the set of fees forwarded to the county council be increased substantially, particularly in areas well beyond existing UGAs.

Third, we also strongly encourage the county to develop binding, workable interlocal agreements with the cities, beginning with Bellingham, to implement TIFs that begin to cover the costs of trips on county roads that begin, end, or both begin and end in a city. At present, it appears that considerable capital costs will not be collected from new developments because the origin and / or destination of these trips are in incorporated cities.

Fourth, the proposed plan could give greater emphasis to supporting alternative forms of transportation. We believe a larger portion of the revenues collected from impact fees and other sources should be used to support pedestrian, bicycle and ride-sharing amenities. Where

Steering Committee: Todd Donovan, Rick Dubrow, Lynnea Flarry, Eric Hirst,
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possible, new fees recovered from new development should cover a greater share of the costs of extending public transportation service.

Finally, we oppose the relaxation of concurrency requirements in Chapter 20.78 and are concerned with how concurrency requirements are being altered and applied. Rather than moving up from a 4 unit to 9 unit threshold to trigger requirements for mitigation, we prefer to have no exemptions, so that even single-residence developments would be subject to concurrency requirements. We also encourage the council to look seriously at more rigorous uses of the concurrency rules. The GMA allows communities to require concurrency much sooner than the six year window discussed in these plans. Likewise, we worry that the proposal to alter road capacity level-of-service standards may be making it easier for new residential development to be shown as concurrent, even if the areas receiving growth are not prepared for additional development.

Although we have these specific concerns, we commend the county for pursuing impact fee policies that move us toward a point where growth pays for growth.

Sincerely,

Todd Donovan
Steering Committee Member

cc: David Stalheim, Dept. of Planning & Development Services
Gary Davis, Senior Planner