



Whatcom Chapter

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David Stalheim
Director, Planning & Development Services
Whatcom County
5280 Northwest Drive
Bellingham, WA 98226-9097

Subject: Downward Revision of Blaine Urban Growth Area (UGA) Boundaries

Dear David:

Futurewise Whatcom encourages the Whatcom County Department of Planning & Development Services (PDS) to promptly revise the Blaine UGA. Our support for a much smaller UGA is based on two facts. First, the existing UGA includes large amounts of wetlands. Second, the Department's recent analysis shows "a substantial surplus of land available within the Blaine UGA."¹

Futurewise Whatcom is the local chapter of the statewide smart-growth group Futurewise. Our primary goal is to protect the rural areas of Whatcom County from sprawling development. To accomplish that goal, we must limit the geographical expansion of existing cities and create compact, healthy and attractive neighborhoods within which growth will occur.

The Blaine unincorporated UGA includes 2,213 acres of wetlands and other critical areas, about 70% of the total area of the unincorporated UGA (3,167 acres). Such large amounts of critical areas are not appropriate for inclusion in UGAs and should be placed in the county's rural area.

The PDS Staff analysis found that the UGA is oversized: "In comparison with the amount of land needed to accommodate the 2002-2022 population projection, county staff estimates a substantial **surplus of land available within the Blaine UGA**. ... [In addition,] **there is a surplus of land available to accommodate projected commercial and industrial uses**." (bold in original)²

The staff calculated a surplus of 409 acres of residential land, a surplus of 28 acres of commercial land, and a surplus of 44 acres of industrial land—a total of 481 acres. This 481

¹ Whatcom County Planning & Development Department, *UGA Review Staff Report*, p. 13, January 18, 2008.

² See footnote 1.

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acres of surplus land is more than double the amount of net developable land in Blaine's unincorporated UGA (236 acres).

We believe the Blaine UGA is even more oversized than suggested by the PDS analysis. In particular, the assumptions on market factor and housing density appear to be biased in favor of a larger-than-necessary UGA:

- The current analysis uses a market factor of 25%, which is generally the maximum allowed. Lowering the market factor from 25% to 20% would increase the amount of surplus land from 481 acres to 543 acres.
- The current analysis uses a housing density of 4 units/acre, which is generally the minimum allowed for urban areas. Increasing the average density of new residential construction from 4 to 5 units/acre would increase the amount of surplus residential land from 409 to 473 acres.

As Futurewise earlier noted, it is not enough for the county to *review* UGAs, it must also, where appropriate, *revise* the UGAs on the basis of its analysis.³

To create a future that embodies our values, we need to plan with those values in mind. Protecting our farms, forests, wildlife habitat, open spaces and other rural lands from sprawl is a consistent, countywide goal. The County's official planning efforts need to reflect this fact. If Whatcom County is serious about protecting rural areas from sprawling developments, it must ensure that UGAs are no larger than needed to accommodate projected population growth. Increasing the size of the UGAs every few years is a certain recipe for eventual loss of all rural lands in Whatcom County. To follow this course would be a failure of planning. Taking action—sooner rather than later—to reduce the Blaine UGA would be a significant step in the right direction.⁴ We respectfully urge the County to do so.

Thank you for considering these comments from Futurewise Whatcom.

Eric Hirst
Chair, Futurewise Whatcom

cc: County Executive Pete Kremen
Members of the Whatcom County Council

³ Letter from Tim Trohimovich to Ken Mann, Chair of Whatcom County Planning Commission, January 23, 2008.

⁴ Whatcom County Council, "Confirming Completion of Urban Growth Area Review," Resolution No. 2008-007, February 12, 2008.