



P.O. Box 1517  
Bellingham, WA 98227

March 25, 2009

Whatcom County Planning Commission  
Bellingham, WA 98225

Dear Whatcom County Planning Commission,

**Subject: Ordinance Permanently Removing the Lot Clustering Provision from Whatcom County Code 20.42, Rural Forestry District**

Futurewise Whatcom is the local chapter of statewide land-use advocacy organization, Futurewise, whose mission is to promote healthy communities and cities while protecting farmland, forests and shorelines today and for future generations. As advocates for wise land use planning that preserves rural areas from urban-style development, we are very interested in the issue of lot clustering in rural forestry districts.

We support the County Council's desire to make the interim ordinance permanent. Futurewise Whatcom agrees that this lot clustering provision is inappropriate for the Rural Forestry zone, and doesn't work as intended. Allowing lot clustering in Rural Forestry zones could be contrary to our three goals of protecting rural land, promoting compact, livable cities, and preventing sprawl, and we encourage the Whatcom County Planning Commission to forward a recommendation for approval of the Whatcom County Code amendments.

**1. Lot clustering in rural forestry areas may not protect rural land.**

- It introduces suburban or even urban-level densities in rural areas because it encourages the creation of compact housing developments.
- Storm water and sewage treatment facilities are commonly required in cluster residential areas because of the concentration of waste-water discharge from the development.
- Suburban-level service, especially police protection, would be reasonably expected by residents of cluster housing developments, yet the County never collects as much in taxes from residential units as it costs the County to provide governmental services to the residences.
- Forests as resource lands and the long-term viability of our local forestry industry is mostly incompatible with cluster developments, and the "gentrification" of the rural zone could further discourage logging, which is a legitimate rural industry upon which some aspects of our rural economy still rely.
- The buffer between urban and rural development intended to be created and maintained by RF zoning is eroded by clustering.

**Protecting Rural Land • Promoting Compact, Livable Cities • Preventing Sprawl**

**Steering Committee:** Allison Aurand, Todd Donovan, Lynnea Flarry, Eric Hirst, Michael Lilliquist, Charlie Maliszewski, Tris Shirley, Dan Warner      **Chapter Director:** Cathy Lehman  
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- More residential units can be built with clustering than would be allowed without it, because un-buildable lots may still contribute their development rights to the residential cluster neighborhood.
- It may exacerbate the economic pressure on rural land prices by introducing the expectation of continued suburbanization and possible speculative land purchases.
- The “reserve tract” left over when residences are clustered is in no way permanently protected from later development; such development is obviously likely to occur once part of the area is suburbanized. WCC 20.36.320 defines a “reserve tract” as that portion of a proposed subdivision or short subdivision which is intended for “agricultural, forestry, open space or future development” (emphasis added).
- “View sheds” in rural areas are disturbed by mountain-top developments and the rural aesthetic is permanently undermined.
- Traffic and pollution problems inherent in the creation of any suburban housing development are further exacerbated by RF clustering.

**2. Lot clustering in rural forestry areas does not promote compact, livable cities.**

- Compact, livable cities are more likely to flourish and maintain their attractiveness to residents and developers if mountain-top residential options are discouraged rather than encouraged.
- In the Lake Whatcom watershed, Bellingham’s “livability” would be undermined by the addition of scores of new homes further complicating the quality of the lake’s drinking water.

**3. Lot clustering in rural forestry areas does not prevent sprawl.**

The creation of suburban cluster housing enclaves is contrary to the prevention of sprawl. Such developments encourage rural sprawl, precisely what the GMA seeks to avoid.

Futurewise Whatcom urges you to approve a permanent ban on Rural Forestry clustering. Thank you very much for your service to our community.

Sincerely,



Daniel M. Warner