



Eric Hirst
1932 Rhododendron Way
Bellingham, WA 98229
360-656-6690
EricHirst@comcast.net

Whatcom Chapter

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City Council
City of Bellingham
Bellingham, WA 98225

Comments on October 20, 2008 PRO Plan and Bellingham land supply analysis (LSA)

Futurewise Whatcom, since its formation in April 2007, has been concerned about the City of Bellingham 2006 proposal for a very large expansion of its urban growth area (UGA), more than 2,000 acres. We believe Bellingham can accommodate all its planned growth through 2022 within its existing city limits. We expressed our views on the Bellingham UGA boundaries in several recent fora:

- Written and oral comments to the Whatcom County Council in August and December 2007,
- Written and oral comments to the Bellingham City Council in January 2008,
- Participants in a case before the Western Washington Growth Management Hearings Board, decided on October 13, 2008 (Case No. 08-2-0021c),
- Written and oral comments to the Bellingham Planning Commission in October 2008.

Futurewise Whatcom is the local chapter of the statewide group Futurewise. Our primary goal is to protect the rural areas of Whatcom County from sprawling development. To accomplish that goal, UGAs should be no larger than needed to accommodate future population growth.

In 2007, the City of Bellingham vigorously defended, before the Growth Management Hearings Board, a parks level of service (LOS) of 47.5 acres/thousand people (Petition #06-2-022). This LOS is a key factor in determining how much additional land the city might need to accommodate future population growth.

The October 20, 2008 *Parks, Recreation and Open Space Plan* proposes a 25% reduction in LOS, to 35.8 acres/thousand people, reducing the amount of land the city needs to acquire for parks by about 1,100 acres. This dramatic change in LOS will sharply reduce the amount of *developable* land the city needs to accommodate future population growth by as much as a thousand acres between now and 2022.

Futurewise Whatcom takes no position on a preferred parks LOS. We do believe, however, that whatever level is chosen in the 2008 PRO Plan should be promptly reflected in a revised LSA. Prompt revision of the city's LSA is essential for several reasons:

Steering Committee: Todd Donovan, Rick Dubrow, Lynnea Flarry, Eric Hirst,
Michael Lilliquist, Charlie Maliszewski, Tris Shirley, Dan Warner
Chapter Director: Cathy Lehman

- The Washington State Growth Management Act requires internal consistency among all the elements of a local government's comprehensive plan. In particular, the amount of land needed for new parks (and therefore not available for residential, commercial and industrial development) in the PRO Plan needs to be consistent with the number of acres used in the LSA, as noted by the Bellingham Planning Commission earlier this month.
- The amount of land to be added to Bellingham's urban growth area is a critically important policy issue that will strongly affect the quality of life for all Whatcom County residents. The City of Bellingham recognizes this truth, as demonstrated by Mayor Pike and the Bellingham City Council in Resolutions 2008-03 and -09. This policy must be explicitly adopted in the Bellingham Comprehensive Plan in order for it to have the necessary effect on future planning.
- The Growth Management Hearings Board decision (noted above) on the Bellingham UGA largely upheld the Whatcom County decision to expand the Bellingham UGA by 286 acres. To be consistent with the county's decision, the City of Bellingham should prepare an up-to-date, internally consistent analysis that reflects the increased land supply associated with a lower parks LOS, consistent with the county's decision.

Thank you for this opportunity to comment on this important change to the city's Comprehensive Plan.

Eric Hirst
Chapter President