



P.O. Box 1517  
Bellingham, WA 98227

May 5<sup>th</sup>, 2009

Whatcom County Planning PDS  
5280 Northwest Drive  
Bellingham, Washington 98226

Dear members of the Growth Management Coordinating Council,

**Subject: Phase II Growth Allocation Policy Issues**

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. We appreciate and welcome the opportunity to comment on these "Phase II Growth Allocation Policy Issues" before you this week at the GMCC, and have included brief responses to each of the items you'll be considering in the discussion. We thank Whatcom County PDS staff for making this memo available in a timely manner so we could participate in a critical stage of the planning process.

**1. *How much deference should be given to local proposals for growth allocation?***

Courtesy at least requires deference be given to local proposals for growth allocation, but--as the "policy considerations" section points out--we also need to be sensitive to the effects of urbanization on agricultural and resource lands and to the effects of urbanization on transportation planning. Some jurisdictions can no doubt expand with minimal threat to farmland, others less so. A broad county-wide view will serve the larger community better than a narrowly-focused local view if the two conflict.

**2. *Does the over all growth forecast require adjustment?***

Futurewise Whatcom has frequently noted on the record over the last 6 months the many reasons to adopt a modest population projection for the next 20 years and frequently monitor and adjust according to realities as they occur. Additionally, owing to the current economic downturn, we highly suggest revisiting the numbers originally generated by OFM for this process to determine the reliability of sticking with such (possibly) outdated forecasts.

**3. *Is the initial pattern of growth distribution as proposed the most desirable alternative?***

If the small cities can provide amenities sufficient to serve their populations, that accomplishes two purposes: it reduces automobile traffic to and from Bellingham, and provides some tax revenue for the small cities. It is very important to reduce growth in rural areas and concentrate it, as feasible, into urban areas, and we are very supportive of policies that encourage this activity. Please keep in mind however that residential development costs more to service than it generates in taxable income, and assuming a net gain in tax revenue from residential growth alone is a dangerous fallacy.

**4. *Should UGA expansion into ag lands include mitigation for the loss of such lands?***

According to County PDS, between 1991 and 2002 Whatcom County lost 24,179 acres of farmland. The present documents show another 1,039 acres of ag land in current small-city UGAs. A related point is that PDS has identified 2,111 potential additional dwelling units currently capable of being built out in ag zoned land. This would represent an 84% increase of existing development on ag land – and is *already* at risk for development.

Futurewise Whatcom opposes any additional loss of ag land, and we hope the GMCC will agree with us that additional agricultural casualties are no longer acceptable. Statewide, we have yet to see successful application of

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

**Steering Committee:** Allison Aurand, George Boggs, Todd Donovan, Lynnea Flarry, Eric Hirst, Michael Lilliquist, Charlie Maliszewski, Tris Shirley, Dan Warner **Chapter Director:** Cathy Lehman

[Whatcom@Futurewise.org](mailto:Whatcom@Futurewise.org)

360-224-8877

[www.Futurewise.org/Whatcom](http://www.Futurewise.org/Whatcom)

"mitigation" in ag land; prime agricultural soil is a precious resource that has taken many decades and centuries to cultivate and cannot be easily replicated. Mitigation is not the answer; it is a second rate attempt to solve the problem of growth in ag lands which has been shown to be unsuccessful in such nearby places as Skagit County.

**We must stop accommodating growth in agricultural soils of Whatcom County.** Expansion onto ag land is not the solution, and now is the time to take a strong stance on this issue. We ask you to please consider the importance of our current growth patterns on our future ag economy, food security, and rural character – our sense of Whatcom County as a unique place – in your strong determination to accommodate growth in places **other** than agricultural lands.

Whatcom County has some of the best farmland in the world, and the value and necessity for our farmland could increase exponentially over the next century as other more traditionally agricultural areas are negatively affected by the impacts of climate change.

Finally, must disagree fundamentally with the statement, "County should focus on agricultural protection in other ways that do not impact urban growth, such as purchase of development rights, lot consolidation, rezoning of rural lands to agriculture, etc." While PDR, lot consolidation, and rezoning of APO soils are critical pieces of the puzzle to fix the zoning mess in our ag lands, we must change the way we approach this problem from the top down. Let's take ag land off the table for urban expansion and address urban growth with the many tools we have at our disposal. This is not an insurmountable problem, but we need a strong policy stance from the GMCC to prioritize agricultural viability in Whatcom County if it is ever going to happen.

***5. Is the allocation of growth to rural areas reasonable?***

A key Futurewise Whatcom goal is to protect our working forests and other rural areas from sprawling development. Additionally, the GMA strives to direct growth out of rural areas. These goals are fully consistent with the two comprehensive Visioning processes (1993 and January 2009), in which the citizens of Whatcom County expressed a strong desire that 75 to 90% of the non-federally owned land in Whatcom County remain rural. (Appendix C of the Whatcom County Comprehensive Plan.) Greater efforts need to be made to restrain growth in rural areas, or the citizens' vision for this county will never be realized. Impact fees would help, and contrary to the assertion of the BIAW that Whatcom County could not impose impact fees because the County comp plan is not entirely GMA compliant, our inquiries with the Futurewise legal team and an independent land use attorney have determined otherwise. County imposition of impact fees would help to reduce the subsidies that current citizens/taxpayers make to new development, would make it more economically attractive to develop inside existing urban areas, and would address citizen preferences for protecting open space and working rural land. Even if the County accepts the BIAW argument, it should complete all the background work on the various impact fees allowed by state law so that when the County does become compliant, it can legally implement such fees promptly.

***6. What expectations are there for demonstrating adequate public facilities and services for all urban growth areas as part of this review process?***

Futurewise will certainly follow closely to see that the jurisdictions can demonstrate adequate planning and funding for public facilities and services in accordance with RCW 36.70A.070(3) and (6). Part (3) references the capital facilities plan which must forecast the needs for such facilities and provide "at least a six-year plan that will finance such capital facilities within projected funding capacities and clearly identifies the sources of public money for such purposes." Part (6) also requires that the transportation plan identify funding. In both cases the land use assumptions are to be "reassessed" if "probable funding falls short of meeting identified needs." In other words, it would be prudent to plan for compact urban development conservatively sized because providing the required infrastructure will be very expensive.

Thank you again very much for the opportunity to comment on these important policy questions.

Sincerely,

Cathy Lehman  
Chapter Director