To the Planning Department, Planning Commission, City Council and Mayor:

The city has until June 2016 to complete it comp. plan update. Therefore, while there is still time, it is urgent that we discuss the need for an environmental impact statement (EIS) to analyze the impacts that will result from the increase in city population by 36,000 over the next 20 years.

During the last comp. plan update process in 2006, the city completed an EIS that covered the incorporated City of Bellingham and its UGAs to review the environmental impacts of a projected population growth of 31,000. This was completed in June, 2004, more than 10 years ago. http://www.cob.org/services/planning/environmental/enviro-impact.aspx.

The administration recently advised the city council that it was coordinating efforts with the county for a programmatic EIS review. That is true only to the extent that the county EIS addresses Urban Growth Areas (UGA) that the city intends to annex. I confirmed this with the county planner, Matt Aamott, who stated that “each city will need to determine the level of additional environmental review for their comp plan updates. It may be that each City can adopt the UGA portion of the EIS and then conduct further environmental review on the remainder of the City Comp Plan update – that will be up to the individual city.”

The city itself acknowledged it might need to complete additional environmental review, reflected in the June 14, 2014 “Scope and Schedule” document (http://www.cob.org/services/planning/comprehensive/2016-update.aspx):

“Environmental Review - The County is producing a programmatic EIS for the update process; however, the city may need to complete additional environmental review of various growth scenarios in order for the public, Planning Commission and City Council to gain a thorough understanding of the impacts and tradeoffs associated with the population and employment growth forecasts. The costs associated with this environmental review can vary dramatically, depending on the
number of growth scenarios examined and whether the work is done "in house" using existing staff or if consultants are used for some or most of the review.

To date, I am unaware of any efforts by the administration to prepare an EIS, or even to engage in a meaningful attempt to examine the impacts of 36,000 more people. More growth results in greater strain on our natural resources and critical areas at a time when the these things are already under tremendous pressure due to climate change and loss of ecosystem function. Human "intensity of use" impacts are among the hardest to mitigate. There is little land left to develop that is not affected by critical areas. To date, we have ignored issues of terrestrial and bird species, open space and habitat corridors, and the more we grow before addressing these problems, the closer we come to a potential violation of the Growth Management Act, which requires that we protect diversity of species and prevent fragmentation of habitat.

Therefore, I believe it was inappropriate for the Planning Department to issue a SEPA Determination of Nonsignificance for amendments to the Critical Area Ordinance. It should be rescinded immediately.
http://www.cob.org/services/planning/environmental/critical-areas.aspx. (Page 34 of the Staff Report.)

The SEPA DNS was issued independent of the larger comp. plan process of which it is a part, and prior to the issuance of the County EIS, which may be the only EIS for the city’s entire update process. The CAO is the section of the city’s development regulations that deal with environmental protection and mitigation standards. How was the city able to determine if it could protect the functions and values of critical areas without knowing how much growth is being planned, what kind of growth, and where and how such growth is being placed?

It is reasonable to anticipate that population increases, changes in land capacity and UGA boundaries, and increased infrastructure will have significant environmental impact. The EIS, or least some meaningful form of environmental review, provides information regarding the nature and extent of those impacts and therefore, whether the city needs to change environmental regulations, mitigation standards, or the provisions of the various comp. plan chapters.

If the city proceeds with its 2016 comprehensive plan update without a SEPA Environmental Impact Statement (EIS), this could compromise the city's ability to comply with the requirements of the GMA, and/or leave it more vulnerable to challenge in the event of an appeal. Accordingly, I request:

- The SEPA DNS for the CAO be rescinded immediately.
- The city delay enactment of revisions to the CAO and other comp. plan provisions and regulations, including determining final population and employment figures, until the release of the county’s final EIS.
• The city produce an EIS specific to its 2016 comp. plan process, just as it did for the 2006 comp. plan review.
• I highly recommend that the city include a wildlife assessment and habitat review, performed by an experienced field biologist (terrestrial species) that relies upon the 1995 and 2003 wildlife and habitat review and recommendations from Nahkeeta Northwest. This would provide the most useful information, based on a watershed ecosystem review, regarding the appropriate scope and concerns for the CAO, particularly with regard to habitat issues, which can not be addressed through a site-specific approach. This type of EIS could be used to help establish a baseline standard through which to measure future changes in critical area function and value.

Thank you for considering my concerns. I am pleased that the Planning Department was responsive to the public after the public hearing before the planning commission, so I am hopeful that they will support, at least in part, some of my recommendations. But at a minimum, I hope that you will acknowledge and publicly discuss the situation regarding the EIS.
It needs to be created and used to inform the process before any important decisions are made.

Please accept this email as part of the official record for the 2016 comp. plan update process and include it with the public comments submitted to date on the comp plan website. Because the CAO is part of the comp. plan update, I do not believe that the comments from the CAO process should be recorded separately.

Sincerely,
Wendy Harris
Rick Sepler,

Bellingham and Whatcom County have gotten too large and overpopulated. I was born in Bellingham 22 years ago and don’t want to ever leave. Bellingham is my home and always will be, however, I’m losing my love for our beautiful town. I’m writing you in regards to the housing/zoning changes that are being discussed to address our overpopulation issue and lack of available housing.

One simple change could make a huge difference in our available housing without building any more homes. Getting rid of the law that only allows 3 unrelated people per house.

Shared housing has done wonders for Whatcom County and our housing crisis. Students, temporary residents, and low income people need places to live. I’ve lived in many shared housing situations where the landlord was unintentionally breaking the law by filling up their 4+ bedroom house with unrelated people who need homes.

If half of the people in Bellingham who had a spare bedroom in their home rented it out our housing crisis would be solved. Studios could go to couples or small families that need more than just a room and larger homes would open up as well.

One benefit of renting out one spare room is that your mortgage or rent payment will drop by $350-500 a month which would help people afford their homes easier, lessen the amount of government assistance that they need, and stimulate the local economy with their spare money.

This law has no reason to exist. I don’t want to live in a city that continues to get rid of their single family homes in lieu of apartment complexes. Our beautiful and quaint town is turning into a city with more buildings less nature.

Help me love my home town for the rest of my life by keeping it a mid sized town.

Best of luck,
Amanda Carter