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Bellingham, Washington

April 25, 2015

Mr. Ali Taysi, Chair
Bellingham Planning Commission
City of Bellingham
210 Lottie Street
Bellingham, WA 98225
Via Email: planningcommission@cob.org

Re: *GMA Requirements for Citizen Participation*

Dear Ali,

I'd like to thank you for serving on the Planning Commission and for the way you conducted the April 23rd joint worksession with the Council's Planning Committee.

I'm writing because I'm concerned that the GMA requirements for public participation are not being fully satisfied in terms of the adoption of the *Population Growth Forecast*.

As you know, RCW 36.70A.140 of the GMA establishes the benchmark for *early and continuous public participation*. The Bellingham Comprehensive Plan states:

"The Growth Management Act **requires** that the Council's action to update the comprehensive plan be based on reasonable public notice and '*early and continuous citizen participation*.' This provision ensures that the plan represents the **Community's 'Informed Consent'** with respect to community goals and values, developed through a visioning process." (*Emphasis added*)

(Bellingham Comprehensive Plan Intro Part 10)

In particular, RCW 36.70A.140 states that the procedures for providing early and continuous public participation shall provide, among other things:

- Provision for **open discussion**; and
- **Consideration of** and **response to** public comments.

It is common knowledge that the adoption of the *Population Growth Forecast* is the **single most important decision** of the entire comp plan update process. This growth forecast is used to determine the amount of land needed to accommodate the projected growth, to anticipate and budget for new transportation facilities, schools, parks and other capital facilities, and to forecast the need for additional police and firefighters, for example.

Of all the decisions made in the update process, the adoption of the *Population Growth Forecast* is, far and away, the one that demands the **highest degree of public participation**.

Several of the procedural requirements listed in RCW 36.70A.140 are difficult to prove, including whether there has been broad dissemination of proposals and alternatives. Ideally, hundreds of concerned citizens would participate in the process. But not everyone in the community is able to do that.

I am fortunate that I can pay attention and attend a few of these meetings. Some of my colleagues as well. We do not speak for the entire community, but we are certainly representative of their vision, values and priorities.

Unfortunately, many of us feel strongly that our input has not received the appropriate level of attention. In terms of the adoption of the *Population Growth Forecast*, we have not had - nor do we anticipate having - an opportunity for genuine open discussion, and we see absolutely no evidence that there has been any consideration of and response to our written and oral testimony.

It would be a travesty if the Planning Commission moves forward with a recommendation on the *Population Growth Forecast* without first adhering to the public participation requirements of the GMA. From what I have experienced so far, I don't believe you would feel good about that either.

I am writing to respectfully request that the Planning Commission provide a venue for genuine open discussion on the *Population Growth Forecast*. As you've experienced yourself when commenting during the Council's public comment period, 3 minutes at the microphone does not cut it.

I'd also like to request that the Planning Commission establish a Comment Tracker for all comments on the *Population Growth Forecast* where evidence that public comment has been considered is on display.

I cannot speak for others, but I am disappointed in the way Planning Commission members responded to the evidence I provided that the population data the Planning Commission is using is both incomplete and out-of-date. In fact, there was absolutely no response at all.

How can that be? Is the Planning Commission satisfied with making this critical recommendation based on flawed data? Surely not. But my comment was neither acknowledged, considered, nor responded to. Is meeting the requirements of the GMA too high an expectation?

The goal of the Planning Commission is to adopt a *Population Growth Forecast* that represents the Community's Informed Consent.

Who is '*the Community*'?

And what is our '*Informed Consent*'?

Here's a clue: Look to the public comment from those of us who don't represent special interests, don't have a financial incentive, and don't profit from growth.

Thanks for your time and for the opportunity to comment on the comprehensive plan update process.

Sincerely,

Larry S. Horowitz