

Jennifer Schneider

From: Karlee Deatherage <karleed@re-sources.org>
Sent: Friday, November 02, 2018 12:53 PM
To: Council; Barry Buchanan; Barbara Brenner; Rud Browne; Satpal Sidhu; Todd Donovan; Timothy Ballew; Tyler Byrd
Subject: Letter re: density credit amendments to the Comp Plan
Attachments: CompPlan_DensityCreditAmd_RESources_20181101.pdf

Good afternoon, Council Members.

Please find attached RE Sources' letter in support of the proposed density credit amendments to the Whatcom County Comprehensive Plan scheduled for a vote on Wednesday, November 8.

Thank you and have a good weekend!

Karlee

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Karlee Deatherage

(she / her pronouns)

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RE Sources for Sustainable Communities

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Whatcom County Council
311 Grand Ave.
Bellingham, WA 98225
Submitted via email: council@co.whatcom.wa.us

RE: Ordinance adopting amendments to the Whatcom County Comprehensive Plan relating to Density Credits, PDRs, and TDRs (AB2018-298)

November 2, 2018

Dear Honorable County Council Members:

We write to express our support of the proposed amendments to the Whatcom County Comprehensive Plan (Comp Plan) regarding density credits, Purchase of Development Rights (PDR), and Transfer for Development Rights (TDR) contained in Agenda Bill 2018-298.

RE Sources for Sustainable Communities (RE Sources) is a local organization in northwest Washington, founded in 1982. RE Sources works to build sustainable communities and protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy, and action. Our North Sound Baykeeper program is dedicated to protecting and enhancing the marine and nearshore habitats of northern Puget Sound and the Georgia Strait. Our chief focus is on preventing pollution from entering the North Sound and Strait, while helping our local citizenry better understand the complex connections between prosperity, society, environmental health, and individual wellbeing. Our North Sound Baykeeper is the 43rd member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has over 20,000 members in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

As a member of the TDR/PDR Multi-Stakeholder Work Group representing the environmental perspective, we see shifting the traditional TDR program to a density credit program as a more efficient tool to encourage the preservation of resource lands and critical areas while directing density or other development incentives to suitable urban areas. Approving this ordinance is one step in a multi-faceted process to establish a density credit program beyond Birch Bay, which you had approved earlier this year.

Other aspects of a density credit program you will hopefully be able to consider in the future, as identified in the TDR/PDR Work Group report include:

- **Establishing density receiving areas beyond certain areas in Birch Bay.**

- Interlocal agreements with the various cities will likely need to be pursued to send density into cities. We encourage the County Council to direct staff to start having these conversations with their counterparts in the various cities.
- When looking at other areas in the county to become density receiving areas, we urge you to avoid environmentally sensitive areas such as areas in river channel migration zones, 100 year floodplain, lahar zones, landslide prone areas, and areas with natural resource designated zoning.
- **Identifying other credit incentives aside from increased density.**
 - Such other incentives could include waived or reduced parking requirements (in the county or various cities), waiving the owner-occupied requirement for attached/detached dwelling units in the county, and increased size of attached/detached dwelling units in the county.
 - We urge you to avoid incentives that would cause further or unintended environmental degradation. This includes reduced buffers for wetlands and habitat conservation areas or waiving stormwater or local low-impact development requirements (which may not be legally permissible in the first place).

Thank you for considering our comments. We look forward to working together to grow the density credit program in order to protect our natural resources and the environment.

Please feel free to contact me if there are any questions or comments.

Sincerely,

Karlee Deatherage
Policy Analyst
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