

Whatcom Environmental Council

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December 1, 2025

To: Whatcom County Council

Subject: Resource Land Chapter of Comp Plan for 12/2/25 meeting

In advance of your review of the draft Comprehensive Plan Chapter 8- Resource Lands we would like to provide you with some high level comments for things that we think need to be corrected.

First and foremost Goal 8F had been changed so it now reads:

Goal 8F: ~~Prioritize~~ ~~Strive to ensure~~ adequate water supplies to support a long-term and thriving agricultural sector while promoting water use efficiency, stewardship, and collaborative basin-wide planning in the face of anticipated changes in temperature, precipitation, and demand.

While we support the goal of trying to ensure adequate water supply for the agricultural sector, the way this goal is now worded appears to contradict previous Council directives and may be viewed as prioritizing agricultural water over water to meet Tribal rights and the instream flow needs of threatened fish. We doubt this is the Council's intent, so we suggest the goal be reworded to make clear that water for farms is not being given a higher priority than tribal rights and the instream flow needs to allow fish to survive. We suggest reverting to the original "Strive to ensure" language, and adding this additional policy to demonstrate that additional water storage and water use efficiency is a high priority for the County

New Policy 8F-? Use the County's membership on the WRIA 1 Watershed Management Board, along with other authorities, memberships, and connections, to demonstrate strong leadership to forge a system of collaborative solutions to create and fund new water use efficiency and storage programs that can be implemented independently or in parallel to the ongoing adjudication process.

There also seems to be some issues and omissions in the Forest Resource Lands section of Chapter 8. Here are the issues we noted:

- Map 8-4 shows land that is "designated" forest land, yet the definition of Forest Land quoted from the GMA defines Forest Land as land that is **"primarily devoted to growing trees for long-term commercial timber production."** Forest Land included in Map 8-4 includes thousands of acres of forest land owned by the City of Bellingham and the County in the Lake Whatcom Watershed, and based on policy documents from those entities, and review of the nearly completed Lake Whatcom Forest Management Plan little if any of that land is **"primarily devoted to growing trees for long-term commercial timber production."** *Perhaps a new designation of forest land that is not primarily for timber production needs to be created, and that made clear on both Map 8-4, and in Chapter 8.*

- The City of Bellingham and Whatcom County have recently contracted for a Lake Whatcom Forest Management Plan. That plan is nearing completion and the Council will soon be asked to approve of it. We have reviewed that plan, and we wholeheartedly support the Council adopting that plan and incorporating it by reference into this Comp Plan. Since the Lake Whatcom Forest Management Plan makes clear that those lands are not primarily devoted to timber production perhaps the reference to that plan should go in the new Climate section of this chapter since much of the management of that forest land relates to reducing climate impacts, carbon sequestration, improving water quality, reducing forest fire threats, and preventing mass wasting events due to increased rainfall. Policies from that Plan could be incorporated into that section, and we would also encourage a new policy that would provide the impetus to actually prioritize and fund the work that the Lake Whatcom Forest Management Plan lays out.
- The definition of Forest Land from GMA is a rather antiquated view that could lead one to believe the only real benefit of forest land is for timber production. While working forests are certainly important and preventing the conversion of those forests needs to remain a priority, there are many other economic and non-economic benefits that forests bring to both the natural and human environments. Perhaps in the new Climate section of this chapter there should be added a description and policies that make clear that in some instances protecting forests for the benefits they provide outside of timber production is also important.
- Finally, the County a little over a year ago created the Forest Resilience Task Force to create a Forest Resilience Plan for Whatcom County. Volunteers spent hundreds of hours to create that Forest Resilience Plan, and to deliver it to the County on time this past September. Yet we find no reference to that plan in the current draft of the Comp Plan. That Forest Resilience Plan contained many goals and policies for creating more resilient forests across forest ownership categories. We ask that recognition of that plan be provided in this chapter and that the appropriate goals and policies from it be incorporated.

Thank you for your consideration of our comments.

Sincerely,



Carl Weimer, President
Whatcom Environmental Council

C: Planning & Development Services