

# Whatcom Environmental Council

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July 8, 2025

To: Whatcom County Planning Commission

Cc: Whatcom County Council

Whatcom County Planning and Development Services

**Re: Comments on Staff Version of Chapter 9, Parks & Recreation**

Dear Whatcom County Planning Commission,

Thank you for the opportunity to provide comments on the staff version of Chapter 9 of the Comprehensive Plan.

**Public Participation Plan Not Being Followed** - We would first like to express concern that the County is not adhering to its own Public Participation Plan for the Comprehensive Plan update. There has been a significant delay in the timeline, which we understand may be due to funding and staffing constraints. However, these delays have made public engagement difficult. Even at this stage, it remains unclear which chapters will be released when, and how and where the public is expected to provide feedback.

Currently, it appears chapters are being released individually for review—without the broader context of other chapters that may affect or be affected by each other. This is not a very comprehensive way to review a Comprehensive Plan. The Public Participation Plan explicitly states that the full draft Comprehensive Plan would be shared with the Planning Commission, County Council, and the public before the review process begins, with a combined workshop in June 2025 to roll out the full draft. That rollout has not occurred. As a result, you are being asked to review chapters in isolation, which makes a

final review more onerous and less likely to be done well.

**Clarify the Scope of the Chapter** - We support the renaming of this section to *Parks & Recreation*, but the scope remains unclear. It is confusing for the public to understand what kinds of recreation are included and why. A true “comprehensive” plan might be expected to address all recreational opportunities within the county, yet this chapter excludes those provided by cities, as well as on state and federal lands. Many

types of recreation are largely absent, for example boating, fishing, shellfish harvesting, bird watching, and indoor or team sports.

We recommend amending the introduction to clearly define the scope—namely, that the focus is on park and recreation resources that the County owns, maintains, or is considering developing. This clarification will help the public understand the chapter’s intent and limitations.

**Integration with the CPROS Plan** - We appreciate the improved integration of Chapter 9 with the County’s Comprehensive Park and Recreation Open Space Plan (CPROS). In the past, the Comprehensive Plan and the CPROS—each required by different branches of state government—contained conflicting language and policies, creating confusion. The alignment in this version is a significant improvement.

**GMA Requirements** – Under “GMA Requirements” on page 9-4 it states:

*“This chapter supports implementation of Growth Management Act (Chapter 36.70A RCW) provisions that encourage counties to adopt **an optional** “Parks and Recreation Element” under RCW 36.70A.070”*

Yet RCW 36.70A.070 is the list of required elements, so this sentence should be changed to:

*This chapter supports implementation of Growth Management Act (Chapter 36.70A RCW) provisions that require counties to adopt a “Parks and Recreation Element” under RCW 36.70A.070*

**Policy 9A-8 – Fees and Public Access** - We do not understand where this proposed policy came from or why it is needed. County parks do not charge entry or usage fees, so it is important to clarify whether this policy refers to specific facilities such as the rifle range, campgrounds, senior centers, or rental venues.

We also note that a Parks Commission recommended policy is not included in the current draft. That proposed policy would have addressed concerns about County fees and insurance requirements that may have discouraged the use of regional parks for events like the Scottish Highland Games, bluegrass festival, and hot air balloon festival at Hovander Park. Their suggested language was:

*“Seek public input, and review and report to the County Council on whether the current fees and insurance requirements for use of regional parks have decreased use of those parks for events and festivals, and if so, make recommendations on potential ways to alleviate this barrier.”*

This proposed policy seems more targeted and potentially more effective than the current 9A-8. We recommend that it be reconsidered for inclusion.

**Multi-use Camping Parks** - We support the removal of this section and the relocation of its policies into more appropriate sections. If approved, please ensure the subsequent goals and policies are renumbered accordingly.

**Trails and Pathway Systems** - There is potential overlap between this section and Chapter 6 on Transportation—particularly in light of new requirements for Active Transportation and level-of-service metrics for multimodal trails. Although the Planning Commission’s final conclusions on Chapter 6 have not yet been published, we understand that there was discussion of removing long-planned multimodal trails such as the Bay to Baker and Coast Millennium Trails.

These trails were included in Chapter 6 because they are considered part of the County's transportation network and may be eligible for transportation funding through the Transportation Improvement Program (TIP) that is overseen by the Public Works Road Department. Regardless of where these trails are discussed in this plan, it's essential that their funding eligibility is not compromised by removing them from the transportation network.

**Trail Type Definitions** - There continues to be public confusion around the definitions of "recreational trails," "multimodal trails," and "active transportation networks." These terms are often used inconsistently.

We recommend that the County provide clear definitions. In our view—and consistent with definitions used by other agencies—multimodal trails are part of the Active Transportation Network. They are primarily for non-motorized users, separated from motor vehicle traffic, and do not include bike lanes on roads. Without clear definitions, confusion from Chapter 6 may carry over into this chapter as well.

**Policy 9C-11 – Trails Along Dikes** - We support the revised Policy 9C-11. The trails at Hovander Park along the dike are heavily used, and other jurisdictions have successfully developed similar trails that expand access, enhance recreational opportunities, and support tourism. We hope to see further development of trails in these areas.

**E-bikes and Trail Access (Policy 9C-29)** - We support Draft Policy 9C-29 as a thoughtful first step in addressing the growing complexity of e-bike use on County trails. As Active Transportation is typically defined as human-powered, this raises questions about whether certain e-bikes qualify. With some e-bikes now resembling small motorbikes, clear and enforceable distinctions are needed to guide usage and ensure trail safety and accessibility.

**Policy 9E-5 – Cherry Point Recreation Access** - We strongly support the inclusion of Policy 9E-5. The Cherry Point area contains important ecological, cultural, and recreational resources. With changes in ownership and land use policies, the time is now ripe for the County to coordinate among tribal governments, agencies, and private landowners to develop a cohesive plan that protects natural and cultural resources, and enhances recreational opportunities in this important area.

**Policy 9I-5 – Parks Funding and Impact Fees** - Parks and open spaces are among the top reasons people value living in Whatcom County. However, the Parks Department is consistently asked to expand services without adequate funding.

While we support exploring diverse funding sources, the idea of impact fees is already well understood. It is time to move forward with implementation. We urge the County to act on this policy and not delay further while exploring other options.

We also support the policies floated by multiple advisory committees and citizen groups, which seem not to have been included in the staff version, to set aside a specific percentage of transportation funds from the road program that can be used for such multimodal trails. Here is one example from Walk and Roll Bellingham:

*“Direct a minimum of 5% of TIP (Transportation Improvement Program) funds annually to improve Whatcom County's active transportation network.*

Without such a set aside the County's commitment to these trails seems to be lacking and all the money is used for motor vehicle road improvements and these important non-motorized trails, many of which have been in our recreation plans for decades, never get completed.

Thank you again for the opportunity to comment. Please don't hesitate to reach out if you have questions or would like clarification on any of the points raised above.

Sincerely,



Carl Weimer, President  
Whatcom Environmental Council