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November 13, 2026

To: Kim Lund, Mayor
Bellingham City Council

Subject: Proposed 2026 Comprehensive Plan Docket Ordinance

The City Council and Mayor are being asked to approve amendments to the 2025 Comprehensive Plan. Included in those amendments, found on page 13 of the proposed ordinance, is an amendment that says: "Update link to 2026 PROS Plan." The hyperlink to the 2026 PROS Plan is not provided in the proposed ordinance, nor is the 2026 PROS Plan provided for review.



Is the public to assume the City intends to adopt by reference the Parks, Recreation and Open Space (PROS) Plan approved by Resolution 2026-11 on May 21, 2026, which is found at this link: https://cob.org/wp-content/uploads/PROSPlan_2026final.pdf?

Or is there some other document that the proposed ordinance intends to adopt?

If it is the Council's intention to adopt the Plan from May, 2026, after careful review, we oppose that action for reasons set forth below.

Growth Management Act requirements for park plans

Without the benefit of hearing directly from the public, the City Council approved Resolution 2026-11 on May 21, 2026 adopting a PROS Plan "in order to qualify for parks and recreation funds from state and federal agencies", like the Washington State Recreation and Conservation Office (RCO). But complying with RCO funding requirements is different than meeting park and recreation requirements under the Growth Management Act (GMA), which governs how comprehensive plans are amended, including a park and recreation element.

HB 1181 was passed by the Legislature in 2023 to improve the "state's climate response through updates to the state's planning framework".

HB 1181 made the following amendments to the GMA that are relevant to the parks and recreation element of the comprehensive plan:

- Amended the requirements for the park and recreation element to include "an ***evaluation of tree canopy coverage*** within the urban growth area" (RCW 36.70A.070(8))
- Added a definition of ""[g]reen infrastructure"" to include "***parks and other areas with protected tree canopy***" (RCW 36.70A.030(38) and amended the requirements that the ***capital facilities plan element include "green infrastructure"*** (RCW 36.70A.070(3)
- Amended the requirements for the land use element to include "green spaces, urban and ***community forests*** within the urban growth area" and required "special consideration to … efforts to avoid creating or worsening environmental health disparities." (RCW 36.70A.070(1))

In addition to these requirements of HB 1181, the GMA requires the Comprehensive Plan to "identify open space corridors within and between urban growth areas …" that "include lands useful for recreation, wildlife habitat, trails, and connection of critical areas as defined in RCW 36.70A.030" is met. (RCW 36.70A.160) The current PROS Plan is used to comply with this GMA requirement, and as such, the proposed PROS Plan needs to demonstrate compliance with this GMA requirement.

1. **The 2026 PROS Plan includes an action that could surplus Samish Crest Open Space property.** The PROS Plan states that open space lands purchased with voter-approved Greenway levies should be reviewed because they might "better serve the City's goals around housing..."[1] There are many other choices where housing should be built that won't impact critical wildlife corridors. This action should be stricken from the proposed 2026 PROS Plan.

2. **The City's Plans for possible extension of Governor Road would block a Greenways-funded wildlife corridor.** The public may also be unaware that the City considers "an … extension of Governor Road [as] necessary to realize the full development potential for adjacent areas in the City and North Yew Street UGA."[2] The City added this justification for keeping the South Yew Street UGA Reserve, but not until AFTER the public hearing was closed on the 2025 Bellingham Plan. An extension of Governor Road across Samish Crest Open Space would bisect a critical wildlife corridor acquired with voter-approved Greenway funds.

How the 2026 PROS Plan falls short of GMA requirements

3. **The 2026 PROS Plan fails to evaluate tree canopy or identify parks or other areas with protected tree canopy.** Neither the proposed PROS Plan, nor the Capital Facilities Plan, mention tree canopy,

[1] Proposed 2026 PROS Plan, pg. 3-47.
[2] Bellingham Plan, Appendix A, p. 90

let alone evaluate[3] tree canopy coverage in the City's parks. The 2026 PROS Plan defers work that should be accomplished now to some unidentified time in the future.[4]

4. **The 2026 PROS Plan fails to identify parks – or portions of parks – that are considered community forests and should be protected.** The 2026 PROS Plan does not identify which City parks are considered community forests with tree canopy that will be protected. The Plan includes vague references that "[o]pen space lands include forests…"[5] but Figure 3-10 of the PROS Plan only shows *existing* open space and fails to identify which areas are considered community forests where tree canopy will be protected.

5. **The 2026 PROS Plan fails to include best available science in the designation of open space corridors for wildlife habitat and connection of critical areas.** In particular, Figure 3-10 fails to identify the Samish Crest/South Yew Street Urban Growth Reserve area as a wildlife corridor or connected critical areas, consistent with best available science as explained below.

   The Washington State Department of Fish and Wildlife has recommended "an open space policy … that aligns with WAC 365-196-335… to ensure lasting connectivity and resilience for local species."[6] The City is relying on the 2021 Wildlife Corridor Analysis to create the map in Figure 3-10 (p. 3-41 of the proposed PROS Plan). As confirmed by City staff, the 2021 wildlife analysis did not extend into the UGA or include the UGA Reserve that is part of both the 2025 Bellingham Plan and this 2026 PROS Plan.[7] This leaves out important wildlife habitat that should be considered for preservation. As noted by the City's Habitat and Restoration Manager, "contiguous forested area will generally show you the extent of the important Wildlife Habitat Areas that *would have been mapped if we had included areas outside the UGA*." (Emphasis added.)

   The Open Space Map should be amended to include the forested areas that are important wildlife habitat areas and connected critical areas.

In conclusion, the proposed 2026 PROS Plan should not be adopted as part of the City's comprehensive plan until amendments as suggested in this letter are addressed. Whatcom Environmental Council, as well as individual Board members, have previously provided input on the GMA requirements for parks,

[3] Evaluation means a "determination of value, nature, character, or quality of something or someone". Merriam-Webster definition found at https://www.merriam-webster.com/dictionary/evaluation

[4] "The city is currently working to complete an Urban Forest Plan which will identify all future goals, priorities, and actions for the City's urban forest." Proposed 2026 PROS Plan, p. 6-76.

[5] Proposed 2026 PROS Plan, pg. 3-40.

[6] Letter from Timothy Stapleton, Washington Department of Fish and Wildlife Region 4 Habitat Program Manager, March 27, 2025.

[7] "Yes, you are correct that the Wildlife Corridor Analysis only mapped important Wildlife Habitat Areas and Important Wildlife Corridors with the City and UGA…. However, I have another dataset that will help: Forest Blocks … shows the contiguous forested area… [and] will generally show you the extent of the Important Habitat Areas that would have been mapped if we had included areas outside the UGA." Analiese C. Burns email to David Stalheim, June 21, 2024.

open space corridors, protection of tree canopy and community forests. It is disappointing that the City has ignored our input from the past two years.[8] But it is not too late to do the right thing.

Sincerely,

David Stalheim on behalf of
Whatcom Environmental Council

Attachments:

- Department of Commerce Climate Planning Guidance
- Whatcom Environmental Council letter dated December 1, 2024
- Whatcom Environmental Council verbal testimony February 24, 2025
- Whatcom Environmental Council letter dated October 29, 2025
- Whatcom Environmental Council letter dated November 3, 2025
- Washington State Department of Fish and Wildlife letter dated March 27, 2025
- 2021 Wildlife Corridor Analysis
- 2025 Bellingham Plan

[8] Whatcom Environmental Council, as well as individual Board members, have provided input on the GMA requirements for parks, protection of tree canopy and community forests, as detailed in the letters and testimony attached.