Whatcom Environmental Council

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December 1, 2024

TO: Mayor, City of Bellingham
Bellingham City Council
Bellingham Plan Team

First off, we want to congratulate the City of Bellingham on your efforts to update the Bellingham Plan. You have taken this effort seriously by engaging populations that have not traditionally participated in planning efforts. You have also taken this opportunity to rethink your growth strategies beyond the minimum requirements of state law. Our hats are off to you for this ambitious effort.

To build on the work done to date, we recommend the following additional analyses to ensure that the "proposed growth strategy" complies with the Growth Management Act (GMA) and coordinates with the County's overall growth strategy.

State Environmental Policy Act

Answers to some of our questions are often found in the environmental review of proposed plans, where the public and decision-makers can see "one or more alternative means of accomplishing that goal {GMA Update] and the environmental effect can be meaningfully evaluated." (WAC 197-11-784) The project timeline does not include any reference to when you will comply with the State Environmental Policy Act (SEPA). The growth alternatives in the Whatcom County Environmental Impact Statement (EIS) regarding greenhouse gas emissions, vehicle miles traveled, fish and wildlife corridors should be available before you move forward with many elements of your plan.

Regional Growth Strategy

We don't see anything in your draft growth strategy that addresses Bellingham's role in the regional (county) growth strategy. The following are topics that should be discussed.

Water

Water is essential for growth. Water is essential for agriculture. Water is also essential for fish and wildlife. We are at the beginning of a long process to address the adjudication of water right claims in the Nooksack watershed. What role does Bellingham, its water rights,

and its diversion of water from the Middle Fork of the Nooksack play in that process? If Bellingham places a priority on water for fish and wildlife, then how might that affect your proposed growth strategy?

Share of Growth
It appears that Bellingham is proposing to assume a greater share of population and employment growth than in the past. Our input on this issue requires additional information that should be found in the SEPA environmental review. We need to see which growth allocation alternative would result in a reduction of greenhouse gas emissions and per capita vehicle miles traveled. If that alternative demonstrates that Bellingham would best accomplish this requirement, then we could support that, and your growth strategies should make explicit the reasons for accommodating additional growth.

Rural Growth
Pursuant to a 2022 Interlocal Agreement, Bellingham is required to consider a density credit program where developers obtain density credits purchased from agricultural lands, rural areas or sensitive watersheds. Density credits should be ***mandatory*** for any proposed UGA expansion and considered as a development incentive in other areas.

Urban and Community Forests
The Growth Management Act has a new requirement to designate urban and community forests within urban growth areas. These designations are required to be included in your Land Use Element, not the Climate Change and Resiliency Element. (RCW 36.70A.070(1)) Your November 2024 Land Use Chapter Update provides no reference to urban and community forests.

We would urge you to identify these urban and community forests early in the process. Much of the City's parks and greenways are heavily forested and could be designated. We would want to see that these designations include protections to ensure that they remain urban and community forests and not converted to other uses that would result in loss of the forest.

We also note that your strategy includes consideration of expanding into the Samish Crest/Yew Street/Lake Padden area, which is heavily forested, a critical wildlife corridor, and helps protect Lake Padden water quality. This area needs to include open space corridors, as already shown in your Parks, Recreation and Open Space Plan and the forest requires protection and conservation. See attached map.

Open Space
The GMA and the current comprehensive plan require open space corridors within and between UGAs useful for recreation, wildlife habitat, trails and connection of critical areas. (RCW 36.70A.160 and Policy LU-59) Your November 2024 Land Use Chapter Update identifies shifting an area between Bellingham and Ferndale from UGA to UGA Reserve. We identified an open space corridor in our letter dated August 23, 2024 and previously commented that we believe designating it as a UGA Reserve would be inconsistent with the need for a wildlife habitat corridor and connection of critical areas. See attached map indicating an area we believe should be studied for removal from the UGA and designation as an open space corridor.

We would like this update to the Bellingham Plan to identify the vision for where growth will go beyond this planning period. For a good example, we turn to Boulder, Colorado where in 1959, the community established the "Blue Line" restricting water lines from being extended into the foothills. Developers found loopholes, so the community passed a sales tax in 1967 to create an open space greenbelt ("Green Line") around the community, resulting in over 45,000 acres of open space and 148 miles of trails within the city.

Where is Bellingham's Green Line?

Your draft growth strategy appears to break through the Green Line identified in the Parks, Recreation and Open Space Plan (see attached Open Space Map). The Open Space Plan clearly identifies open space at the outside edges of the Urban Growth Area, including the North and South Bellingham UGA Reserve areas you are considering adding for urban growth.

We have created two maps (attached) which insert conceptual plans from Caitac, USA[1]. Caitac's proposal would impact designated Open Space Corridors, would be adjacent to Agricultural Lands and Rural Study Areas, and would merge with Limited Areas of More Intense Rural Development (LAMIRDs). Expansion into the UGA Reserve would have less conflicts, but a vision of open space outside the UGA should preclude their expansion of urban development to Smith Road.

If Bellingham expands the UGAs, we encourage specific language in the Plan to designate a "Green Line" where open space or resource lands are permanently protected.

Climate Change and Resilience

We can't identify the strategies you are considering for how you propose to reduce and eliminate local GHG emissions and per capita vehicle miles traveled. Your November 2024 Climate Chapter Update appears to reference the 2018 Update to the Climate Protection Action Plan. A review of that update fails to identify any measure to reduce vehicle miles traveled, nor any meaningful measures to increase residential densities through infill and changes to existing low-density zoning designations. We would encourage that these climate change issues become front and center to your growth strategy and take precedence over expansion of the UGA.

Environment

The Environment goal of GMA (RCW 36.70A.020(10)) was amended in 2023 to require the ***enhancement*** of the environment, not just protection. We do not see anything in your November 2024 Environment Chapter Update Summary that indicates the measures you propose to enhance the environment in Bellingham.

Thank you for the opportunity to comment.

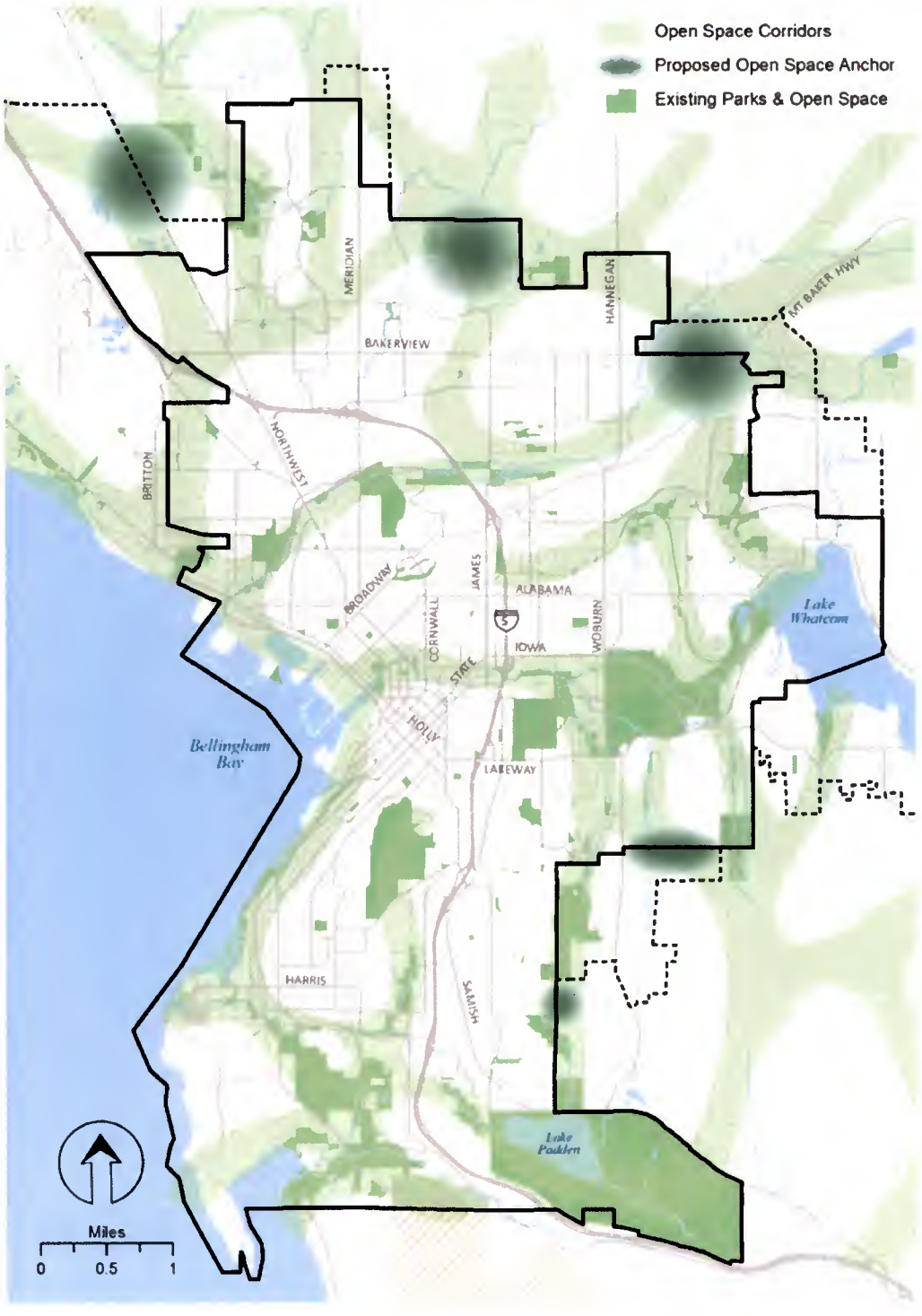
Regards,
David Stalheim on behalf of Whatcom Environmental Council

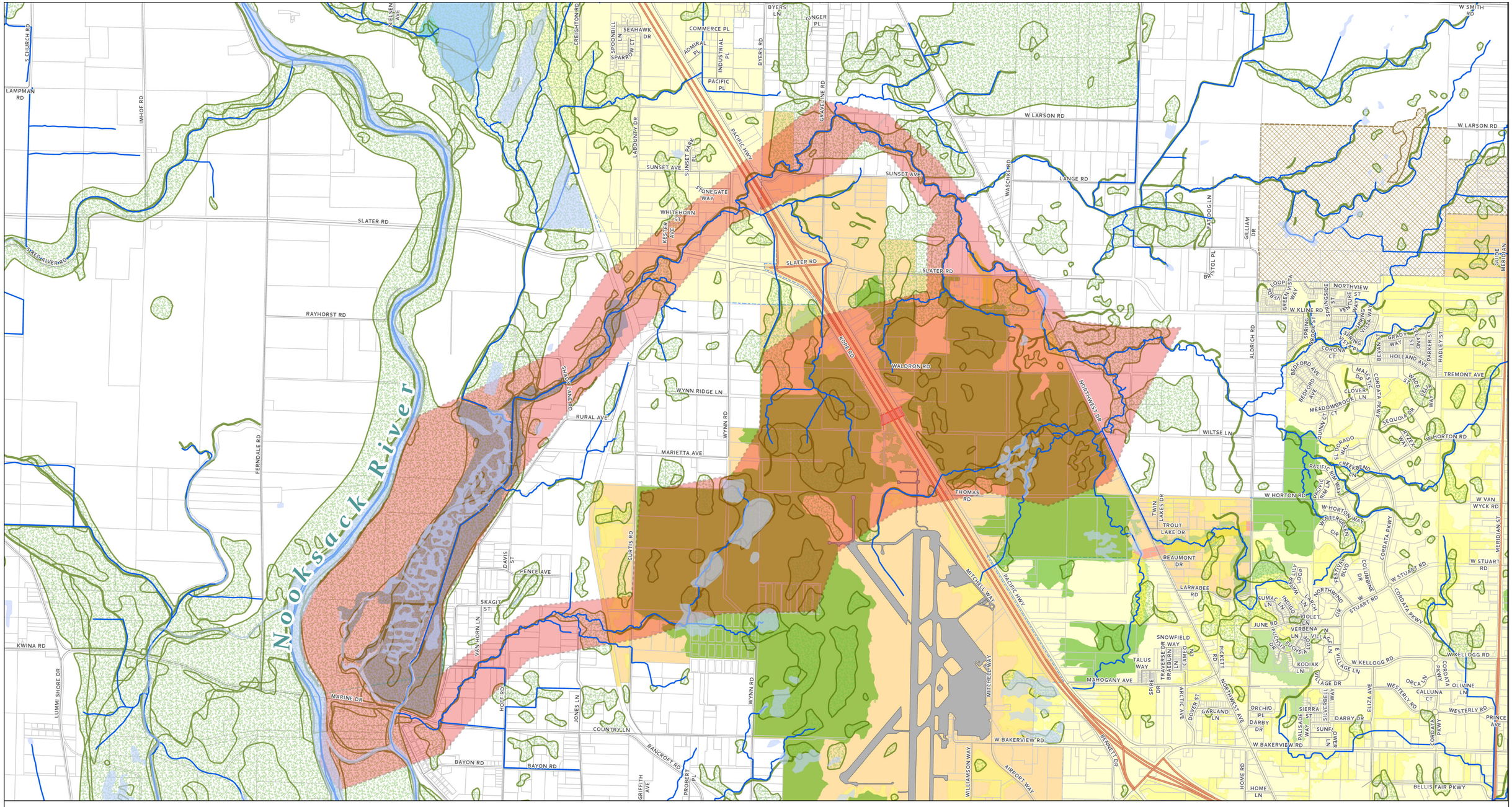
[1] See letter and map dated September 5, 2024 submitted to Whatcom County.

C: Lummi Nation
Nooksack Indian Tribe
Bellingham Planning Commission
Whatcom County Council
Whatcom County Planning Commission
Whatcom County Executive

Attachments:
Bellingham Open Space Plan (2020)
Open Space Corridors between Bellingham and Ferndale
North Bellingham UGA Reserve
Bellingham to Nooksack River Land Use Map
South Bellingham UGA Reserve

RECOMMENDED FACILITIES PLAN • OPEN SPACE





Legend

- Open Space Corridors - Proposed Study Area
- Priority Habitat and Species (Mapped)

Cities, UGA & UGAR

- Cherry Point UGA
- Urban Growth Area (UGA)
- Urban Growth Area Reserve (UGAR)
- City Limits

Terrestrial Wildlife Habitat Network

- Important Wildlife Habitat Area
- Important Wildlife Corridor
- Significant Movement Barrier
- Movement Barrier
- Eelgrass Inventory

TWHN Multi Species Overlap Areas

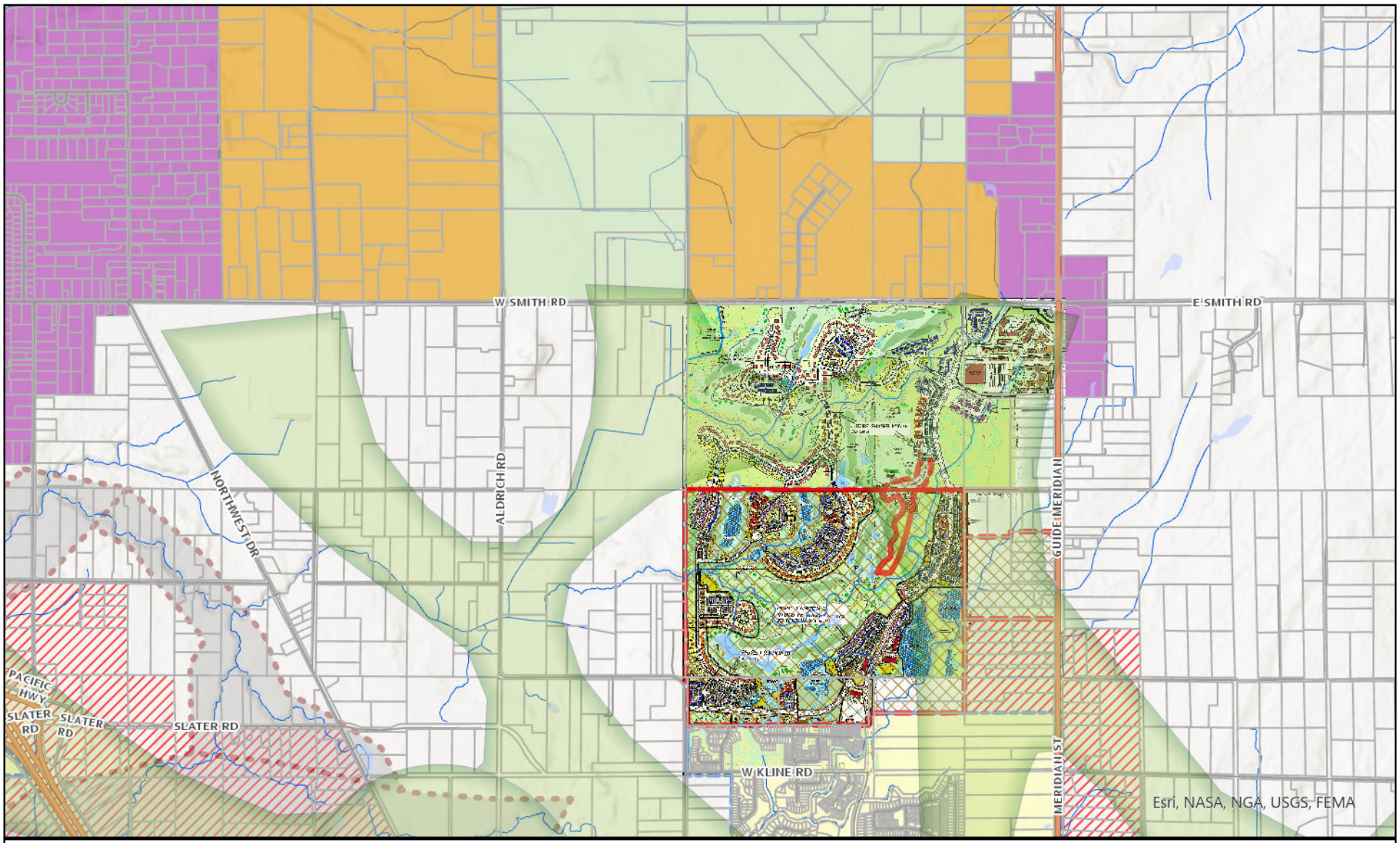
- Important Habitat Hub
- Other Habitat Patch

N

Bellingham-Ferndale Urban Growth Area

Open Space Corridor (Wildlife & Habitat)

0 0.25 0.5 1 1.5 Miles



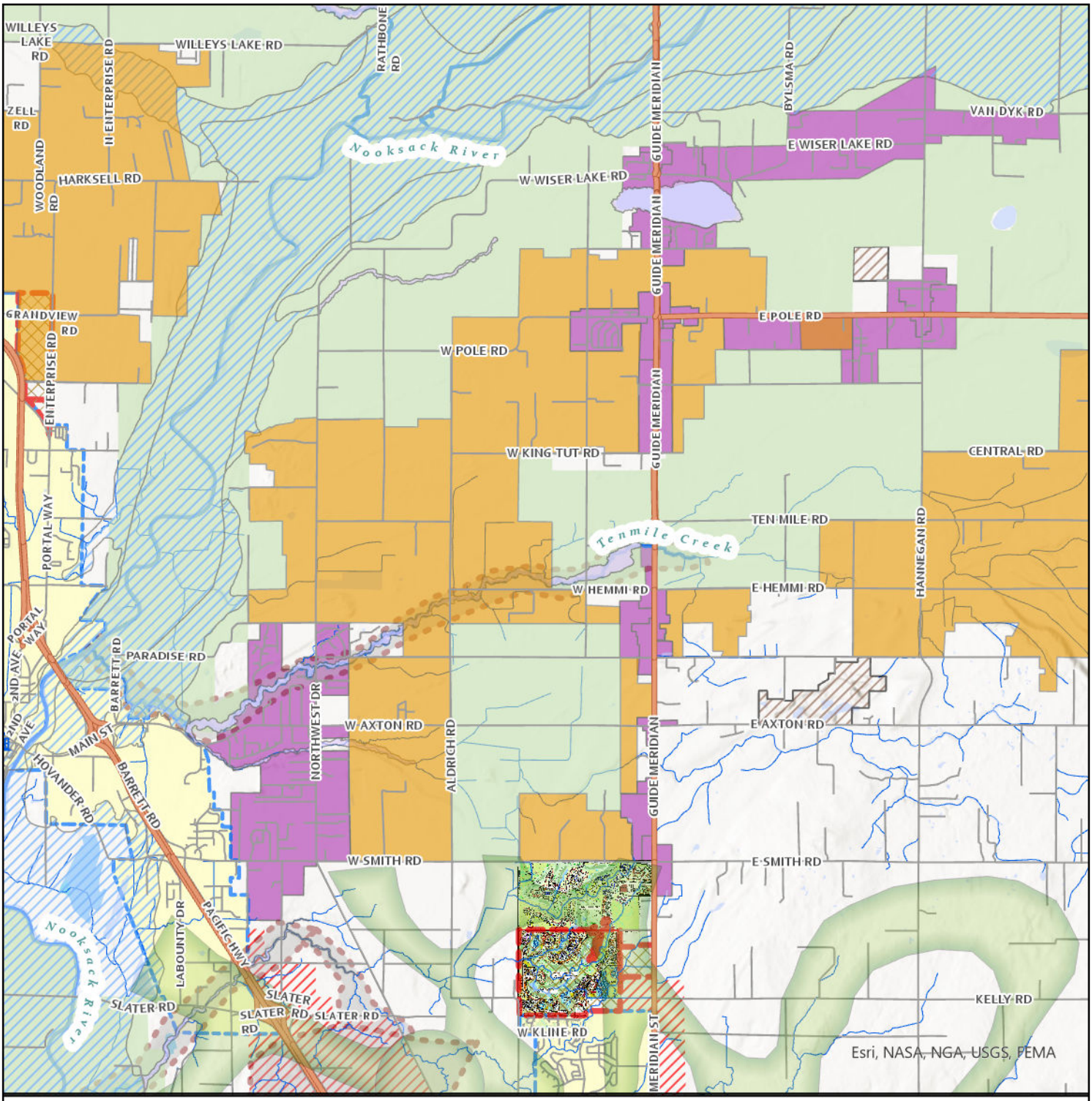
Legend

- Agriculture
- Commercial Forest
- Rural Forest
- Mineral Resource Lands
- Rural Study Areas 2019
- City Limits
- Urban Growth Area (UGA)
- Urban Growth Area Reserve (UGAR)
- Cherry Point UGA
- Whatcom LAMIRDs
- Open Space Corridors (Bellingham Plan)
- Open Space Corridors - Proposed Study Area

N

North Bellingham

0 1,000 2,000 4,000 6,000 Feet



Legend

- Agriculture
- Commercial Forest
- Rural Forest
- Mineral Resource Lands
- Rural Study Areas 2019

FLOOD_ZONE

- A - SFHA (No BFE)
- AE - SFHA (BFE)
- AH - SFHA (Shallow)
- AO - SFHA (sheet)
- VE - SFHA (Coastal)

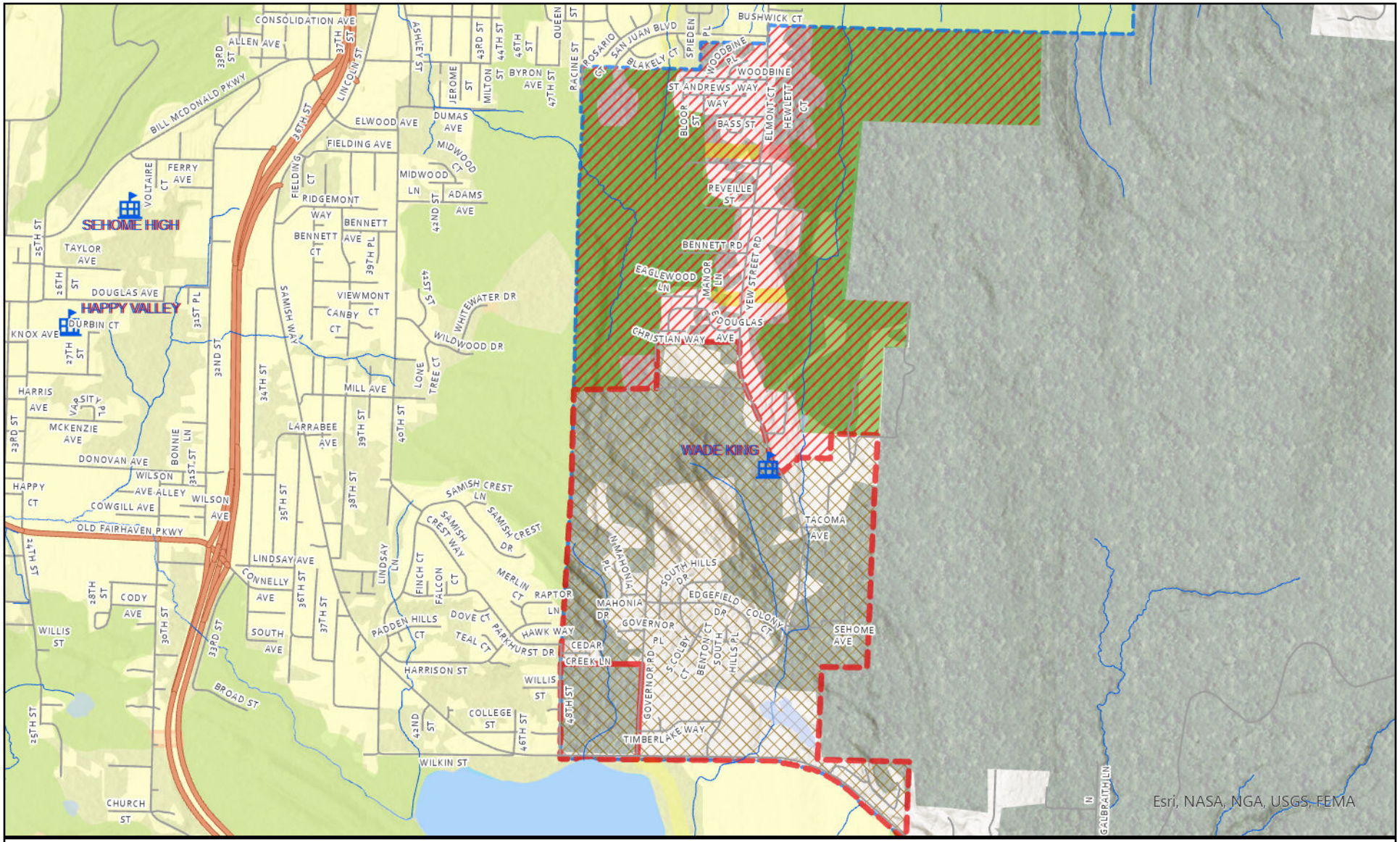
- City Limits
- Urban Growth Area (UGA)
- Urban Growth Area Reserve (UGAR)
- Cherry Point UGA

- Whatcom LAMIRDs
- Open Space Corridors (Bellingham Plan)
- Open Space Corridors - Proposed Study Area

N

Bellingham to Nooksack River

0 5,000 10,000 Feet



Legend

- Important Wildlife Habitat Area
- Important Wildlife Corridor
- Significant Movement Barrier
- Movement Barrier
- Forest Blocks
- City Limits
- Urban Growth Area (UGA)
- Urban Growth Area Reserve (UGAR)
- Cherry Point UGA

South Bellingham

N

0 1,000 2,000 4,000 Feet