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September 18, 2025

To: Bellingham Planning Commission

Subject: Bellingham Plan

Thank you for the opportunity to comment on the draft comprehensive plan for the city of Bellingham. We'd like to first applaud the city for many features of this update, including the commitment to encouraging infill. However, we find the proposed plan deficient in several areas and urge the city to make sure that you get it right before taking action to adopt this plan. A summary of our recommendations can be found at the end of this letter.

Transparency and Public Participation

While the city undertook significant public input early in the process, the draft plan has been available for public review and comment for less than three weeks. While we have spent time reviewing these comments, we frankly haven't had enough time to identify all of our concerns with the plan. We believe many of the deficiencies noted in our comments are compliance issues with Growth Management Act (GMA).

We also believe that the public should be able to find the proposed changes to land use and other maps in a more transparent way. The Future Land Use Map for the entire City is no larger than letter size, a scale that is unreadable. These maps should be available through CityIQ or your GIS Online service on a parcel scale. GIS data of proposed land use designations, open space corridors, etc. should be available to download for those with GIS capability to further analyze the proposals. A property owner should be able to generate a report that identifies their current land use designation and their proposed land use designation, and later with code adoption, the current zoning and proposed zoning. Bellingham staff have the tools and talent to put this together.

In reviewing this plan, we have found at least a dozen policies¹ that allow "flexibility" to many of the standards and expectations. While administrative flexibility might be warranted, it often comes at the expense of the environment and public input, leaving the discussion

¹ See Bellingham Plan Policies CD-3, CD-13, CD-38, CD-39, FS-10, LU-4, LU-19, LU-20, LU-53, LU-55, H-7, and H-47 as examples

and dialogue solely between staff and a developer. We have seen administrative flexibility implemented in numerous places throughout the city that have resulted in lost opportunities for trail connections, inadequate stream buffers, lost habitat, lost opportunities to require affordable housing, and poor urban design. We would urge the City to adopt a policy that requires an evaluation and consideration of the need to inform the public prior to adopting any code amendments that grant additional administrative flexibility.

Plan for Growth

The Growth Management Act is not just about growth. The legislature made clear that GMA was also about “the public’s interest in the conservation and the wise use of our land” and “uncoordinated and unplanned growth...pose a threat to the environment...”²

The Bellingham Plan starts out with “Our Guide to Growth” – the city is “planning intentionally for more housing, jobs, and services”.³ We would like to see this vision be amended to implement the public’s interest in the conservation and wise use of our land that doesn’t pose a threat to the environment.

Population growth is driven by births, deaths, and migration. For Whatcom County, the forecasts “assume a gradually decreasing natural component of population growth largely due to growth in the elderly population.”⁴ The allocation of population to Bellingham is based on the “City’s annual growth rate accommodated over the past 10 years.”⁵ Using the past 10 years to forecast the next 20 years diminishes the cyclical nature of net migration to Whatcom County, as demonstrated in the Whatcom County Population Projections report.

Bellingham talks about “potential influx of people displaced due to climate change”.⁶ What people often call “climate refugees” may be used by some to justify higher migration numbers and growth forecasts. The data presented by Whatcom County disputes that theory.

“In 2016, a [report](#) by researchers at the University of Washington and Portland State University concluded that a sudden and dramatic population increase is unlikely to occur due to climate change. Since that time, wildfires along with heat and drought events in the Pacific Northwest have called into question whether the region is in fact a potential climate-haven. Between 1900 and 2018, the region warmed by 2 degrees, causing reduced snowpack and an increase in drought and wildfires. A 2018 [report](#) by the US Global Change Research Program argued that climate as a driver of migration to the Pacific Northwest is speculative.”⁷

² [RCW 36.70A.010](#)

³ Bellingham Plan, pg. 6

⁴ [Whatcom Population and Employment Projections Final Report](#), pg. 5

⁵ Environmental checklist, Appendix A, pg 11

⁶ Bellingham Plan, Policy C-21

⁷ [Whatcom County Comprehensive Plan, Background Research on Selected Economic, Demographic, and Housing Trends](#), pg 18

While we would not object to Bellingham accommodating a larger share of the population and employment forecast to Whatcom County, we need to point out our concerns to this approach:

- 1) Whatcom County, which under GMA sets growth allocations and establishes the urban growth areas, has proposed growth to be nearly 20% more than the most likely forecast of population for Whatcom County outlined by the Office of Financial Management (OFM). These higher allocations are now being used to support UGA proposals that would expand UGAs into agricultural lands of long-term significance for the commercial production of food or other agricultural products,⁸ justify expansion of UGAs into floodplains,⁹ and significantly increase vehicle miles traveled.¹⁰ Bellingham should only accommodate the additional population if Whatcom County adopts measures to limit growth in other areas, particularly rural and resource lands.
- 2) The City is required to consider a density credit program that would be used for the Whatcom County Conservation Easement Program fund.¹¹ These funds can be used to purchase development rights in Rural and Resource lands, thus encouraging growth in urban areas like Bellingham. There is no record the City has considered this program.
- 3) The City has not demonstrated a reduction in vehicle miles traveled per capita, as required by GMA. See comments below regarding this requirement.

Transportation Element

The GMA requires “multimodal level of service standards for all locally owned arterials, locally and regionally operated transit routes that serve transit routes...”¹² The current comprehensive plan identifies these standards, but your draft plan appears to be missing any adopted standards.

Parks & Recreation

The GMA requires a park and recreation element¹³ that includes estimates of park and recreation demand, an evaluation of facilities and service needs, and an evaluation of tree canopy coverage within the urban growth area.

In the adopted comprehensive plan, the city’s PROS Plan is adopted by reference to meet the requirements of GMA. The draft Bellingham Plan indicates that the PROS Plan is adopted by reference but has no operable link to the current PROS Plan.¹⁴ The City is in the process of updating the PROS Plan, but it is neither complete nor available for public review, so it cannot serve as meeting the GMA

⁸ [RCW 36.70A.170](#)

⁹ See [RCW 36.70A.110\(10\)](#) which outlines the prohibitions to expansion of UGAs into floodplains

¹⁰ See [RCW 36.70A.020](#), (3) Transportation. Encourage efficient multimodal transportation systems that will reduce greenhouse gas emissions and per capita vehicle miles traveled, and are based on regional priorities and coordinated with county and city comprehensive plans.” “(14) Climate change and resiliency. ...support reductions in greenhouse gas emissions and per capita vehicle miles traveled;”

¹¹ [Interlocal Agreement between the City of Bellingham and Whatcom County Concerning Planning, Annexation and Development within the Bellingham UGA](#), July 1, 2022, Section 11.A

¹² [RCW 36.70A.070\(6\)](#)

¹³ [RCW 36.70A.070\(8\)](#)

¹⁴ See pg 87 in the Bellingham Plan

requirement for a Park and Recreation element. This deficiency must be rectified before action on the GMA Plan.

The requirement for an evaluation of tree canopy coverage within the urban growth area was added in the 2023 amendments to GMA. Neither the current PROS Plan nor this Plan provides the required “evaluation of tree canopy coverage” required by GMA. Evaluation means a “determination of value, nature, character, or quality of something or someone”.¹⁵ On page 109 of the Bellingham Plan, there is a map that shows the 2022 LIDAR image of tree canopy. This map is not accompanied by any evaluation of the tree canopy. An example of tree canopy evaluation can be found in the [Urban Forestry Management Plan](#) that has been put on pause by the City.

Climate Change and Resiliency

The Growth Management Act requires a climate change and resiliency element.¹⁶ This element is specific in the requirements, expecting results and actions, such as:

- “designed to result in reductions in overall greenhouse gas emissions”
- “must enhance resiliency and avoid the adverse impacts of climate change”
- “must include efforts to reduce localized greenhouse gas emissions and avoid creating or worsening localized climate impacts to vulnerable populations and overburdened communities.”
- “must identify the actions the jurisdiction will take during the planning cycle consistent with the guidelines published by the department pursuant to RCW [70A.45.120](#)”
- “Result in reductions in overall greenhouse gas emissions generated by transportation and land use within the jurisdiction”
- “Result in reductions in per capita vehicle miles traveled within the jurisdiction”
- “avoid or substantially reduce the adverse impacts of, climate change in human communities and ecological systems through goals, policies, and programs”
- “A natural hazard mitigation plan or similar plan that is guided by RCW [36.70A.020](#)(14)”

The Climate Element in the Bellingham Plan fails to comply with the GMA in several ways, including:

- The Bellingham Plan results in an increase in the per capita vehicle miles traveled,¹⁷ inconsistent with the GMA requirement to reduce per capita vehicle miles traveled.
- The [2018 Climate Action Plan](#), which includes many of the specific actions required by GMA, is not adopted as part of the Bellingham Plan (see pg. 9-9), yet is inexplicably identified in the SEPA Checklist, Appendix A as including “proposed community emissions reduction measures for Bellingham.”¹⁸
- The GMA requires a natural hazard mitigation plan, yet the [2021 Natural Hazard Mitigation Plan](#) is not adopted as part of the Bellingham Plan (see pg. 9-9).

¹⁵ Merriam-Webster definition found at <https://www.merriam-webster.com/dictionary/evaluation>

¹⁶ [RCW 36.70A.070\(9\)](#)

¹⁷ The 2023 per capital vehicle miles traveled (PCVMT) for the Bellingham UGA is 16.1; the 2045 PCVMT is 16.9.

Source: [Whatcom County Comprehensive Plan Update Final Environmental Impact Statement, August 2025](#)

¹⁸ [2025 Bellingham Plan SEPA Checklist Appendix A – Environmental Record](#), pg. 8

- Many of the proposed climate policies are ineffective in resulting in reductions in overall greenhouse gas emissions and enhancing resiliency to and avoiding the adverse impacts of climate change. Policies that state “Develop, implement and regularly update ... drought,...climate...wildfire smoke... wildfire resilience” (C-12, C-15, C-16, C-17) fail to identify when these programs will be developed, how they might be developed or the budget to implement the vague policy. These policies do not result in reductions as required by GMA, just promises that the City might develop, implement and update these various programs.
- Some policies work to undermine the climate element by allowing “flexible ways to promote tree management within a larger area or city scale when a development proposes significant housing opportunities.” (CD-39)

Green Infrastructure

The 2023 amendments to GMA regarding climate change and planning¹⁹ requires an inventory of “green infrastructure”.²⁰ The [Draft Capital Facilities Plan](#) fails to include a green infrastructure inventory.

Environment

In 2023, the GMA was amended to not only ensure that the environment is protected but also enhanced.²¹ GMA also requires that fish and wildlife habitat be enhanced.²² The Bellingham Plan is basically silent on any effort to enhance the environment or fish and wildlife habitat. “Fish habitat” or “wildlife habitat” are mentioned only three times each in the Bellingham Plan. Restating general GMA requirements, such as EV-3 or EV-9, fails to meet the GMA requirements to have a comprehensive plan that enhances the environment and fish and wildlife habitat.

The Bellingham Plan does not provide any reference to recommendations in the [2021 Wildlife Corridor Analysis](#) or the [Bellingham Habitat Restoration Technical Assessment](#), nor to several other habitat management and restoration efforts the City has undertaken,²³ such as the [Post Point Heron Colony](#), [Nearshore Connectivity Study Final Report Dec. 2014](#), or [Fish Barrier Projects](#). These documents have recommendations for enhancing the environment and fish and wildlife habitat. The policies in the Environment chapter should be rewritten to be meaningful and actionable to ensure implementation of the GMA requirement to enhance the environment and fish and wildlife habitat.

The 2023 GMA amendments regarding climate change and planning added a requirement to designate urban and community forests within the urban growth area.²⁴ On page 109 of the Bellingham Plan, a map of tree canopy coverage accompanies a definition of “Bellingham’s Community Forests”. The map, however, does not match the definition, making it impossible to see where the tree canopy coverage

¹⁹ [ESSHB 1181](#)

²⁰ “Green infrastructure” means a wide array of natural assets and built structures within an urban growth area boundary, including parks and other areas with protected tree canopy, and management practices at multiple scales that manage wet weather and that maintain and restore natural hydrology by storing, infiltrating, evapotranspiring, and harvesting and using stormwater.” [RCW 36.70A.030\(23\)](#)

²¹ [E2SHB 1181](#), codified at [RCW 36.70A.020\(10\)](#)

²² [RCW 36.70A.020\(9\)](#)

²³ See Habitat Restoration Planning at <https://cob.org/services/environment/restoration/planning-restore>

²⁴ [RCW 36.70A.070\(1\)](#)

would apply. Even if the definition was mapped, the definition limits community forests to only “City-owned parcels greater than 1-acre.”²⁵ The purpose of urban and community forests in GMA (greenhouse gas emissions and climate resilience) cannot rely only on city-owned parcels greater than 1-acre. In fact, “Urban Forestry 101” in the [Draft Urban Forest Plan](#) says an “urban forest includes all trees, vegetation, soils, associated natural processes, and cultural elements found in towns, cities, and other communities where people reside. Bellingham’s urban forest can be found along streets and parks, within forested open spaces, institutional campuses, and private properties such as parking lots and backyards (Figure 1).”²⁶

The Draft Urban Forest Plan categorizes the importance and benefits of trees and the urban forest into four main areas:²⁷

- 1) **Provisioning Services:** Trees are sources of various products like fruits, nuts, and wood, contributing to local food security and resources.
- 2) **Regulating Services:** They play a pivotal role in regulating environmental conditions. This includes air quality improvement through pollutant filtration, carbon sequestration to combat climate change, temperature regulation through shade and transpiration, and stormwater management.
- 3) **Supporting Services:** Trees support biodiversity by offering habitats to various wildlife species. They also contribute to soil health and stability, thus supporting other vegetation and ecosystems.
- 4) **Cultural Services:** Beyond tangible benefits, trees provide significant cultural and recreational value. They enhance the aesthetic appeal of urban areas, offer spaces for relaxation and recreation, and contribute to the mental and physical well-being of residents, thus enriching the overall quality of urban life.

The Bellingham Plan undermines the importance of the urban forest in several of the proposed policies which preserve trees “where feasible”²⁸ or “seeks to balance a healthy urban forest canopy with the growing demand for housing units.”²⁹

The Bellingham Plan fails to comply with what the City has already characterized as Urban Forestry 101 when it attempted to define urban and community forests as only city-owned parcels greater than 1-acre in size. The City has failed to complete an evaluation of tree canopy coverage in the Parks and Recreation Element. The City has failed to demonstrate that the Comprehensive Plan will enhance the environment, fish and wildlife habitat.

²⁵ The Bellingham Plan, pg 148

²⁶ [City of Bellingham Urban Forest Plan, Draft April 2024](#), pg. 2

²⁷ [City of Bellingham Urban Forest Plan, Draft April 2024](#), pg. 4

²⁸ The Bellingham Plan, Community Design Element, Policy CD-37

²⁹ The Bellingham Plan, Community Design Element, Policy CD-39

Open Space Corridors

The GMA requires “the comprehensive land use plan...[to] identify open space corridors within and between urban growth areas. They shall include lands useful for recreation, wildlife habitat, trails, and connection of critical areas as defined in RCW [36.70A.030](#).”³⁰

The Bellingham Plan fails to identify open space corridors within or between urban growth areas. The adopted [Parks, Recreation, and Open Space \(PROS\) Plan](#) identifies open space corridors³¹ but the Bellingham Plan, although it indicates that the PROS Plan is adopted by reference, has no link to the current PROS Plan.³²

In 2021, Bellingham completed a wildlife corridor analysis that should be used to define the open space corridors useful for wildlife habitat. The Bellingham Plan doesn’t include any of these results “to inform land use, restoration, and protection...”³³ The City should incorporate the findings for habitat corridors in the 2021 analysis into this Comprehensive Plan update. Identification should include clear definitions, consistent with GMA and best available science, and mapped so that the public can identify the location of these corridors.

The Bellingham Plan fails to properly define open space corridors consistent with GMA, instead linking the term “open space corridors” in Policy PR-20 to a definition of “open space”, which refers to “land acquired for the protection of natural resources, landscapes and recreation.”³⁴ The map found on page 91 of the draft Plan identifies “open space” that has been acquired by the city. This is not a map that GMA requires for open space corridors useful for wildlife habitat and connection of critical areas.

Urban Growth Areas

We support the areas removed from the Urban Growth Area, noting in particular the importance of removing urban growth from the Lake Whatcom watershed and from the open space and habitat corridors between Bellingham and Ferndale. See our comments below regarding Urban Growth Area Reserves.

We believe additional study to remove areas from the UGA is warranted. We point out that the [Whatcom County Final EIS](#) shows that the Bellingham Plan would result in an increase in per capita vehicle miles traveled. Until you can show a reduction, Whatcom County and Bellingham have not met the GMA requirement and further reduction of UGAs might be warranted. We will also point out the recent decision from Bellingham to deny an annexation request along Britton Road. Considering that the Britton Road area has been in the Bellingham plan’s UGA for 30 years, we are concerned that your justification was based on financial reasons, which are not a consideration in the GMA. This area, along with other UGA areas, should be evaluated for many factors, including whether urban growth in that location results in a reduction or increase in per capita vehicle miles traveled.

³⁰ [RCW 36.70A.160](#)

³¹ See Map on pg. 36

³² See pg 8-7 in the Bellingham Plan

³³ [2021 Wildlife Corridor Analysis](#), pg. 22.

³⁴ See definition of Open Space on page 151 of the Bellingham Plan

We are concerned that the proposed expansion into North Bellingham (“Caitac”) would also be inconsistent with the need to reduce vehicle miles traveled and is located within the open space corridors identified in the Parks, Recreation and Open Space Plan.³⁵ If this area is added to the UGA, the Comprehensive Plan should include a requirement to have a development agreement that

- implements a reduction in per capita vehicle miles traveled through requirements such as mixed-use development, transit hubs, bike and pedestrian paths;
- includes an assessment of wildlife habitat and set aside of open space corridors useful for wildlife and recreation;
- includes greenbelt corridors to separate urban growth from adjacent areas of more intense rural development (LAMIRDs);
- requires measures to assure that adjacent resource lands are not interfered with the continued use for the production of food and other agricultural products; and
- requires housing to be affordable to a mix of incomes.

Urban Growth Area Reserves

The Whatcom County Comprehensive Plan includes the designation of “Urban Growth Area Reserves.”³⁶ To be considered for this designation, the area must “appear suitable for future inclusion in the respective Urban Growth Area.”³⁷ Neither the area along Samish Crest in the Lake Padden watershed, nor the area being removed from the UGA between Ferndale and Bellingham, appear suitable for inclusion in the Bellingham UGA.

The area proposed for UGA removal between Ferndale and Bellingham is characterized by forest lands, extensive wetlands, and critical habitat corridors. It also serves as the likely “open space corridor within and between urban growth areas” that has not been established as required by GMA. Please see our previous letter (August 23, 2024) outlining why this area is not suitable for urban growth and should be designated as an open space corridor at this [link](#).

The area along Samish Crest, within the Lake Padden watershed and designated as an Urban Growth Area Reserve, also does not appear suitable for future inclusion in the UGA. This area does not contribute significantly to land supply for housing or employment, is heavily forested with steep slopes, and is within areas designated as critical wildlife habitat. The [2021 Wildlife Corridor Analysis](#) shows this area as having:

- the highest rating as a patch for maintaining/improving overall habitat connectivity for the Red-legged Frog, a species that requires moist mixed and coniferous forest;
- the highest rating for Brown Creeper a species whose habitat is “mature and old forest only;
- the importance of habitat areas reduced as they became more fragmented by barriers in the urban development areas;

³⁵ Bellingham Parks, Recreation and Open Space Plan, pg. 36

³⁶ Chapter Two, Land Use, pg. 2-81

³⁷ Chapter Two, Land Use, pg. 2-81

- the Douglas squirrel had fewer important habitat patches within the city. The largest and most connected patches were identified as being important habitat hubs. These included the continuous coniferous forests that extend south of the city;

The 2003 Wildlife Habitat Assessment also shows Samish Crest and the South Bellingham UGA as having excellent habitat scores and high risk scores.

“Block 11 consists of the Samish Hill crest... This block contains diverse micro- habitats including swales, cliffs, caves, balds and snags. Wetlands listed for this block... Deer, coyote, porcupine (Erethizon dorsatum) and amphibians were found in abundance throughout this block. Bobcat are also known to have resided and travel through the area. Many bird species use this area for breeding, rearing and foraging. Block 11 contains the headwaters of Connelly, Lincoln and Cemetery Creeks and a stream flowing into Lake Padden.... Other species have been impacted including porcupine which have been displaced by development from their cave dwellings and killed. Birds requiring specialized habitat have also lost area and habitat quality. Since 1991, nearly 200 acres of habitat have been lost to residential development within this block. This loss has isolated at least 4 blocks of habitat which were preserved because they contained wetlands. These wetlands lose value because they are not connected to the upland and wildlife use is more difficult.”

“The Padden Watershed contains the largest protected contiguous open space within the City. This area harbors notable species richness, habitat diversity and Species of Concern. Comparatively, this watershed represents the greatest habitat diversity and is second only to Chuckanut in known species abundance.”

“There are also strategic habitats and major corridors linking Whatcom Watershed to the north and Chuckanut to the south that remain unprotected. Critical components to the network are currently missing and need to be added in order to complete a functional system.”

“In Bellingham, based on locally significant species and their habitat requirements alone, a minimum upland reserve area is estimated at 640 acres. In theory, it can be assumed that one upland reserve per watershed would provide the necessary habitat and area to support viable populations of native wildlife that currently occur in Bellingham. To assure the function of these reserves over time, connecting habitat corridors would be required.... Several small reserves, however well placed, cannot approach the value of a single large reserve in conserving populations of obligate forest interior bird species, particularly warblers and pileated woodpeckers (Robbins, Dawson & Dowell 1989).

*“To the south edge of the watershed, the upper Hannah and Cemetery Creek drainages provide hundreds of acres of combined alder, mixed and coniferous forests. These forests extend south, over Samish Hill to Lake Padden Park and east into the contiguous block of Lookout Mountain. This and Chuckanut Creek are the only habitat areas within the city with uninterrupted connectivity (lacking major roads/barriers) with thousands of forested acres. This connectivity is crucial in maintaining breeding populations of forest species with large home range requirements such as pileated woodpecker and bobcat, and also allows for occasional occurrence of elk, black bear and cougar. This area is currently an urban wilderness that likely harbors a full complement of forest associated species and is large enough to maintain viable populations of these species over time.”*³⁸

And the [Final Bellingham Habitat Restoration, Technical Assessment](#), completed in 2015 identified the upper Padden Creek area as the third highest priority for permanent buffer protection and protection through regulatory change.³⁹

For all of the above reasons, we recommend that the Samish Crest/Lake Padden watershed area that is proposed to remain in the UGA Reserve be removed.

Conclusion

In summary, here are our initial recommendations for changes to the Bellingham Plan.

- 1) Provide readable maps online to the parcel level, with GIS data available for download.
- 2) Add policy that requires consideration of the need for the public to be notified when administrative flexibility is being proposed.
- 3) Amend vision and “Plan for Growth” to include the public’s interest in the conservation and wise use of our land that doesn’t pose a threat to the environment.
- 4) Notify Whatcom County that Bellingham is willing to accommodate a greater share of growth only when the growth forecast for the entire County is adopted using the most likely forecast from OFM.
- 5) Add level of service standards to Transportation Element as required by GMA.
- 6) Complete an evaluation of tree canopy coverage as required by GMA in the Parks and Recreation Element.
- 7) Include a link to the adopted Parks, Recreation and Open Space Plan to ensure compliance with GMA for the Parks and Recreation Element.
- 8) Amend the Plan to demonstrate a reduction in per capita vehicle miles traveled as required by GMA.
- 9) Amend the Climate Element to include specific actions that demonstrate reduction in greenhouse gas emissions. Examples of actions can be found in the 2018 Climate Action Plan, which could be adopted by reference.
- 10) Ensure the Climate Element has a Natural Hazard Mitigation Plan as required by GMA.

³⁸ [City of Bellingham Wildlife Habitat Assessment](#), March 2003, pg. 94 and 177 of pdf

³⁹ [FINAL – Bellingham Habitat Restoration, Technical Assessment](#), November 2015, Table 17. Pg 61 of pdf

- 11) Complete an inventory of green infrastructure and include in the Capital Facilities Plan as required by GMA.
- 12) Amend the Environment element to include specific actions that will result in enhancement of the environment, and fish and wildlife habitat, as required by GMA.
- 13) Amend definition of urban and community forests to include non-city owned property and provide map that identifies the location of these forests, as required by GMA.
- 14) Add a definition of open space corridors to the Plan and identify where these corridors are located within and between the UGA, as required by GMA.
- 15) Review UGA proposal to identify areas that fail to meet the required reduction in greenhouse gas emissions or per capita vehicle miles traveled, as required by GMA. Resubmit proposal to Whatcom County.
- 16) If the UGA is expanded, add a policy that requires a development agreement that addresses greenhouse gas emissions, vehicle miles traveled, greenbelts, open space corridors, no interference with resource lands and requires housing affordable to a mix of incomes.
- 17) Remove the UGA Reserves for the area between Bellingham and Ferndale, and in South Bellingham within the Lake Padden watershed.

Thank you for your consideration of our comments.

Sincerely,

David Stalheim, on behalf of
Whatcom Environmental Council

C: Kim Lund, Mayor
Bellingham City Council
Chris Behee, Long Range Planning Manager