

Whatcom Environmental Council

Carl Weimer, President

*Former Whatcom County
Council*

Jean Melious, Vice President

Retired WWU Professor

David Stalheim, Secretary

Retired Planning Director

Rick Dubrow, Treasurer

Retired Owner of A-1 Builders

Laurie Caskey-Schreiber

*Former Whatcom County
Council*

Rick Eggerth

Retired Litigation Attorney

Oliver Grah

*Retired Physical Ecologist and
Water Resource Manager*

Rodd Pemble

Retired Recycling Manager

Barry Wenger

Retired Ecology Planner

Email:

whatcomec@gmail.com

Website:

www.whatcomenvirocouncil.org

October 20, 2025

To: Whatcom County Council

Subject: Final EIS Review, AB2025-513

On the October 21, 2025 Council Committee of the Whole agenda is a presentation from the Whatcom County Planning and Development Services Director relating to the preliminary preferred alternatives for the Final Environmental Impact Statement.

As we stated in our [September 24, 2025 letter](#) to the Whatcom County Planning Commission, the preferred alternative in the Final EIS fails to meet the GMA requirement for reducing per capita vehicle miles traveled. The County Council should instruct staff to provide a proposal in compliance with the Growth Management Act.

We provide the following brief notes in response to some community and staff comments about the GMA requirements to reduce per capita vehicle miles traveled (VMT):

- Whatcom County can reduce per capita vehicle miles traveled without having to restrict population growth or limit population allocations.
- State climate guidance directs the county to select measurable policies that are supported by scientifically credible projections and scenarios. Whatcom County has not identified any VMT reduction targets. Your Final EIS has the most credible projections and scenarios available, and these scenarios show per capita VMT will increase from 18.3 to 19.5 for all of Whatcom County, and for the non-UGA areas, will increase from 23.4 to 28.5. Those are not reductions and thus, inconsistent with GMA requirements.
- To understand more about the reasons to reduce vehicle miles traveled, please refer to these WSDOT reports.¹

Sincerely,

David Stalheim, on behalf of
Whatcom Environmental Council

¹ "The Case for Reducing Vehicle Miles Traveled" - <https://wsdot.wa.gov/sites/default/files/2023-06/GMA-Reference-TheCaseForReducingVMT.pdf> and Vehicle Miles Traveled (VMT) Targets – Final Report, June 2023 <https://wsdot.wa.gov/sites/default/files/2023-06/VMT-Targets-Final-Report-June2023.pdf>