

Whatcom Environmental Council

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January 20, 2026

To: Whatcom County Planning Commission

Subject: Draft Comprehensive Plan

Dear Whatcom County Planning Commission:

The Whatcom Environmental Council appreciates the opportunity to comment on the draft Comprehensive Plan. Given the limited time to review the 900+ page Agenda Packet, which further references various previous staff reports to explain and support policies and amendments,¹ our comments are limited to the issues that we believe are most significant. As stated in our previous comment letters on draft chapters, the draft Plan does not comply with the Growth Management Act (GMA).

1. GMA Requirement of a Reduction in Per Capita Vehicle Miles Traveled

The Growth Management Act is clear: the Comprehensive Plan and development regulations must reduce per capita vehicle miles traveled (VMT). The GMA requirement measures the reduction of vehicle miles traveled “per capita”, which acknowledges the assumption of population growth and allocation to urban areas. Even taking population growth in account, the Environmental Impact Statement, for every alternative including the No Action Alternative, shows that the Land Use and Transportation Element will result in an increase in VMT, contrary to the GMA requirement to demonstrate a reduction.

2. Open Space Corridors Between UGAs

The Land Use Element correctly states that the GMA requires the Comprehensive Plan to identify open space corridors within **and between UGAs**.² The Land Use Element states that “Map 2-3 shows proposed Open Space Corridors for Whatcom County.” Unfortunately, Map 2-3 shows that the County has not complied with the GMA. No open space corridor is designated between Bellingham and Ferndale, or other urban growth areas, despite our previous comments and the information that we have provided, detailing how such a corridor could be designated based on public land. The Land Use Element should be revised to designate open space corridors between UGAs.

¹ See, e.g., comment LC7 on p. 12-4: “Discussion [of a Plan amendment] on page 11 of September 30th PC staff memo.” Hyperlinks – within the document, to allow readers to access specific Plan chapters, and to external documents – would be very helpful to facilitate public review.

² Draft Land Use Element, p. 2-109, referencing RCW 36.70A.160.

3. UGA Expansions Into Special Flood Hazard Areas and Agricultural Lands

The Cities of Everson, Nooksack, and Sumas are proposing to expand their UGAs into Agricultural land. Nooksack and Sumas further propose to include Special Flood Hazard Areas in UGAs. These lands are not necessary to accommodate population projections and do not comply with the GMA.

Whatcom County does not have to accept growth allocation requests, especially when growth would be allocated to flood hazard areas. Whatcom County could reduce county-wide growth projections to what the Office of Financial Management has identified as the most likely growth forecast and allocate population to urban areas not subject to flood or loss of resource lands.

Sumas UGA expansion areas 2, 3, 7, and 9 would provide for urban growth in the floodplain of the Nooksack River. On page 7 of Appendix E, Sumas contends that the floodplain land would retain agricultural use (despite the **Urban** Growth Area designation), even though Sumas “does not own these areas and their development rights have not yet been extinguished.” The inclusion of these flood hazard areas in the UGA violates the GMA.

Even if Sumas succeeds in retaining agricultural land uses within its UGA, it would not be appropriate to designate the resulting development pattern as **urban** growth. In particular, the UGA to the west of the City would result in new growth in the middle of agricultural land, largely unconnected to the remainder of the City. This proposal violates the GMA mandate to reduce sprawl and would create a development pattern that would be extremely expensive to service with urban infrastructure. It is also internally inconsistent with Goal 12.11, which commits the County to implementing dense, mixed-use, and transit-oriented development in UGAs.

Finally, providing for increased impervious surfaces in and adjacent to flood-prone areas will exacerbate flooding. The evidence on this is clear. As the U.S. Geological Service explains:

As watersheds are urbanized, much of the vegetation is replaced by impervious surfaces, thus reducing the area where infiltration to groundwater can occur. Thus, more stormwater runoff occurs - runoff that must be collected by extensive drainage systems that combine curbs, storm sewers, and ditches to carry stormwater runoff directly to streams. More simply, in a developed watershed, much more water arrives into a stream more quickly, resulting in an increased likelihood of more frequent and more severe flooding.³

Annual floods increase by 3.3%, on average, for each percentage point increase in impervious cover within a watershed.⁴ It simply does not make sense to introduce additional urban growth, with the inevitable concomitant increase in impervious surface, in flood hazard areas.

4. Urban and Community Forests in UGAs

The Land Use Element recognizes that urban and community forests include public and private lands of any size, stating as follows:

³ <https://www.usgs.gov/water-science-school/science/impervious-surfaces-and-flooding>.

⁴ A.G. Blum et al., *Causal Effect of Impervious Cover on Annual Flood Magnitude for the United States*, Geophysical Research Letters (Feb. 13, 2020), 13 February 2020 (available at <https://agupubs.onlinelibrary.wiley.com/doi/10.1029/2019GL086480>).

The GMA requires the County to designate “urban and community forests” (RCW 36.70A.070(1)). Urban and community forests include vegetated areas on lands in urban growth areas. Specifically, this includes any land with trees and associated vegetation, whether it's planted or naturally occurring, public or private, used or unused, and includes areas along roads, utilities, and forested watersheds within populated zones.

Unfortunately, Policy 2WW-1 limits urban and community forests to “public land greater than 5 acres with over 75% tree canopy.” This policy is not based on any of the values expressed by the Legislature. Instead, it incorporates a totally unrelated definition that applies to federal grants, and then reduces that definition even further by excluding private lands. As stated in the Comment on page 2-115:

The County’s consultant recommended using the 5-acre and 75% tree canopy criteria for identifying urban and community forests. This borrows concepts from the U.S. Forest Service’s Community Forest and Open Space Conservation Program, or Community Forest Program (CFP) provides opportunities for community entities to apply for grants to acquire forest lands. Lands acquired through the program are mandated to be managed according to a community forest plan. Private forest land is eligible that is at least five acres in size, suitable to sustain natural vegetation, and at least 75% forested.

The GMA requirement to designate urban and community forests is not attendant on or equivalent to U.S. Forest Service criteria for community groups to apply for grants. Rather, it is based on the value of urban forests and tree canopy to address climate impacts on vulnerable populations and overburdened communities. Urban forests and retention/increase of tree canopy are critical to boost carbon sequestration, reduce heat islands, and improve air quality in overburdened communities.⁵ Rather than relying (selectively) on the criteria applicable to a federal grant program, the County should apply Washington State policies applicable to urban and community forests.

Thank you for your consideration of these comments.

Sincerely,



Carl Weimer, President
Whatcom Environmental Council

Cc:
Whatcom County Council
Whatcom County Planning & Development Services

⁵ Wash. State Dept. of Commerce, [Climate Element Planning Guidance](#), Menu of Measures, #418.