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September 24, 2025

To: Whatcom County Planning Commission

Subject: UGA and Rural/Resource Proposals for 9/25/25 meeting

The update to the Whatcom County Comprehensive Plan must demonstrate compliance with the Growth Management Act (RCW 36.70A). The GMA, amongst other things, requires:

- Efficient multimodal transportation systems that will reduce greenhouse gas emissions and per capita vehicle miles traveled; ([RCW 36.70A.020\(3\)](#))
- The land use element should ...reduce per capita vehicle miles traveled; ([RCW 36.70A.070\(1\)](#))
- Actions ...that willresult in reductions in per capita vehicle miles traveled ([RCW 36.70A.070\(9\)](#))

The preferred alternative in the [Final EIS](#) fails to meet the GMA requirement for reducing per capita vehicle miles traveled.¹ The Planning Commission and County Council should instruct staff to provide them with a proposal in compliance with the Growth Management Act.

The proposals before the Planning Commission on September 25th include additional GMA non-compliance, including:

- Conversion of Rural APO Soil areas into UGA reserves;
- Failure to identify open space corridors within and between urban growth areas;
- Failure to consider surface and groundwater resources where minimum instream flows are not being met; and
- Sizing urban growth areas with capacity in excess of growth that is allocated for the next 20 years.

Greenhouse Gas Requirements

We support the comments of [Futurewise](#), dated September 18, 2025, which state:

The proposed urban growth area expansions and the rural and resource lands proposals cannot be approved unless the comprehensive plan documents that per capita vehicle miles traveled (VMT) will be reduced taking into account the increased traffic from the urban growth area expansions and rural development.

¹ The preferred alternative that is being presented by staff to the Planning Commission increases the per capita vehicle miles traveled from 18.3 to 19.5, including an increase in the non-urban growth areas from 23.4 to 28.5. None of the current alternatives meets the GMA requirements for reducing per capita vehicle miles traveled.

As stated above, the Final EIS shows Whatcom County is noncompliant with GMA as the per capita vehicle miles traveled is shown to increase in each alternative. What is encouraging in the table below is that some urban growth areas show a decrease in per capita vehicle miles traveled. What is discouraging is that the plan for the County is showing an increase, including a significant increase in the non-UGA areas.

Area	Vehicle Miles Traveled			Per Capita Vehicle Miles Traveled					
	2023 (Base Year)	2045 Preferred Alternative	% Change in VMT	2023 Pop	VMT	2023 Per Capita VMT	2045 Pop	VMT	2045 Per Capita VMT
Bellingham UGA	1,693,782	2,302,246	35.9%	105,529	1,693,782	16.1	135,839	2,302,246	16.9
Birch Bay UGA	35,271	51,016	44.6%	8,908	35,271	4.0	11,570	51,016	4.4
Blaine UGA	90,103	137,261	52.3%	6,728	90,103	13.4	10,228	137,261	13.4
Cherry Point UGA	23,622	33,640	42.4%	61	23,622	387.2	61	33,640	551.5
Columbia Valley UGA	10,226	13,743	34.4%	3,577	10,226	2.9	4,714	13,743	2.9
Everson UGA	26,558	36,588	37.8%	3,171	26,558	8.4	4,579	36,588	8.0
External to County	241,703	305,365	26.3%		241,703		0	305,365	
Ferndale UGA	398,601	563,323	41.3%	16,762	398,601	23.8	27,723	563,323	20.3
Lynden UGA	109,548	150,423	37.3%	16,696	109,548	6.6	23,361	150,423	6.4
Nooksack UGA	13,043	18,882	44.8%	1,573	13,043	8.3	2,568	18,882	7.4
Sumas UGA	11,004	17,868	62.4%	1,810	11,004	6.1	2,810	17,868	6.4
County Non-UGA	1,663,312	2,282,374	37.2%	70,985	1,663,312	23.4	79,985	2,282,374	28.5
Grand Total	4,316,772	5,912,729	37.0%	235,800	4,316,773	18.3	303,438	5,912,729	19.5

Source: [Final Environmental Impact Statement](#), August 2025

Agricultural Resource Lands

In our [September 11th letter](#), we outlined that 100,000 acres of agricultural land has been adopted as necessary to support a healthy agricultural industry.² There are 85,820 acres of land designated as Agricultural in the Comprehensive Plan.³ Whatcom County has adopted an Agriculture Protection Overlay (APO)⁴ requirement that applies to Rural areas (R5 and R10 zones) where the parcels are larger than 20 acres and have more than 50% APO soils. The County has prepared Rural Land Study reports “to identify and map areas within the Rural 5 and 10 zones that are of agricultural significance and may require additional protection to ensure long-term agricultural viability.”⁵ These Rural Study Areas are part of the County’s Agricultural Strategic Plan to ensure there are 100,000 acres of agricultural land available.⁶

² “Maintenance of 100,000 acres of agricultural land to support a healthy agricultural industry.” ([Chapter 8, Resource Lands, Policy 8A-2](#))

³ See Table 3.5-1, FEIS, pg 3-99

⁴ “Use an “Agriculture Protection Overlay” (APO) designation in certain Rural zoned areas as one way to increase agricultural production in areas outside of designated agricultural land of long-term commercial significance.” (([Chapter 8, Resource Lands, Policy 8A-9](#)) Also see [WCC 20.38](#).

⁵ Ibid, pg 4

⁶ See [Resolution 2018-027](#) and the [2018 Agricultural Strategic Plan](#) (attached)

In the current batch of proposals, please note that the Ferndale proposal would designate 1,140 acres of Rural lands to UGA Reserve.⁷ Parts of the proposed UGA Reserve for Ferndale have been included in the [Rural Land Study](#) (see attached excerpt) and includes APO Soils. Converting the Rural lands, with APO soils, to UGA Reserve would be inconsistent with the Whatcom County Comprehensive Plan.

We do want to point out support for many efforts Ferndale has undertaken in their planning initiatives. The city has implemented tools such as minimum densities and mixed-use zoning, and encouraged more employment growth, all of which have resulted in one of the few urban growth areas where per capita vehicle miles traveled is shown to be reduced in the Final EIS. We would encourage the city to participate in a density credit program to purchase development rights in Rural and Resource lands, and to urge Whatcom County to complete a comprehensive Agricultural analysis with required amendments to the Comprehensive Plan and development regulations that demonstrate 100,000 acres are designated for agricultural use and production in Whatcom County. Until that time, the UGA Reserve proposal from Ferndale creates an inconsistency with the agricultural preservation policies of the Comprehensive Plan.

Bellingham UGA and UGA Reserves

We support Bellingham's request to remove areas within the Lake Whatcom watershed from the UGA. These are not areas where urban growth should be encouraged.

We also support Bellingham's request to remove the area between Bellingham and Ferndale from the UGA. This area is characterized by extensive wetlands, critical habitat corridors, and forest lands. We do not support putting this area into UGA Reserve, however, as such a designation would be inconsistent with the requirement for open space corridors between urban growth areas. ([RCW 36.70A.160](#)) This area should be designated Rural, or Rural Forestry.

We would urge Bellingham and Whatcom County to look at even further reductions of the UGA. The Final EIS identifies the per capita vehicle miles traveled would increase from 16.1 to 16.9. Until the city can demonstrate a reduction, it has not met the GMA requirements.

We do not believe that expansion of the UGA into North Bellingham ("Caitac") is warranted. The population land capacity analysis shows an excess capacity of 3,309. There is no indication that this area could result in a reduction in per capita vehicle miles traveled. Public transportation along Meridian Street is limited to Route 71X, which has just 5 trips during the weekday, 3 trips on Saturday and no trips on Sunday.⁸ It is not probable that vehicle trips would be reduced in this area considering the current public transportation service.

The city and county have to consider future proposals.⁹ The "Vision for Larrabee Springs" has been presented to both the city and county and includes expansion to Smith Road. This proposal would expand into Open Space Corridors identified in the Parks, Recreation and Open Space Plan,¹⁰ be adjacent to agricultural lands of long-term commercial significance, and adjacent to rural areas of more intense rural development ("LAMIRDs"). See attached map.

⁷ Source: [Table 2-14 Final EIS](#), August 2025. The Whatcom County Comprehensive Plan includes the designation of "Urban Growth Area Reserves." To be considered for this designation, the area must "appear suitable for future inclusion in the respective Urban Growth Area."

⁸ See <https://schedules.ridewta.com/#route-details?routeNum=71X>

⁹ See [WAC 197-11-055\(2\)\(a\)\(i\)](#)

¹⁰ Bellingham Parks, Recreation and Open Space Plan, pg. 36

The area along Samish Crest, within the Lake Padden watershed and designated as an Urban Growth Area Reserve, 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. We urge that this area be removed from the UGA Reserve and be designated as Rural. For additional support, we are attaching our letter to Bellingham regarding why this area should be removed from the UGA Reserve.

The draft Capital Facilities Plan for Bellingham indicates the “north end of the Cordata neighborhood and the southeast corner of the city along Samish Way are areas that are currently in the City but more than 4 minute travel time from any fire station. These areas should be considered for future fire stations to meet the increased growth in those areas.”¹¹ The UGA expansion in North Bellingham and the UGA Reserve in South Bellingham are not shown to be served by fire protection services.

Cherry Point UGA

We support the removal of the UGA on the north side of Grandview Road. However, staff have yet to provide a proposal that meets the GMA requirement for an open space corridor *between* the Cherry Point and Birch Bay UGAs. Please see our letter dated [August 23, 2024](#) and [July 30, 2024](#) regarding this requirement.

Lynden UGA

We support Lynden’s proposal to not expand their UGA. We also point out that it is one of the areas that has demonstrated a reduction in per capita vehicle miles traveled. We remain concerned regarding Lynden’s capacity to serve urban growth with water that does not further interfere with instream flow requirements.

Rural Density Proposals

We support [Futurewise’s comments](#) regarding the proposed amendments to increase density in rural areas. Again, we will remind Whatcom County that the Final EIS shows that the per capita vehicle miles traveled would substantially increase in the non-UGA area, from 23.4 to 28.5. Providing additional density in rural areas is inconsistent with the requirement to reduce vehicle miles traveled per capita. Increasing density would also be inconsistent with Policy 2JJ-5 that requires development and redevelopment to be consistent with the character of the area on July 1, 1990.¹²

Thank you for your consideration of our comments.

Sincerely,

David Stalheim, on behalf of
Whatcom Environmental Council

C: Whatcom County Council

¹¹ [City of Bellingham, Capital Facilities Plan Draft](#), pg. 36

¹² [Chapter 2, Land Use, Whatcom County Comprehensive Plan](#)

Attachments:

Whatcom County Rural Land Study 2019 Update (Ferndale and Grandview)
North Bellingham and Larrabee Springs Vision
Letter to Bellingham, dated September 18, 2025