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December 18, 2025

To: **Melissa Bianconi**, Recreation Manager
Bellingham Parks and Recreation

Re: Civic Complex Master Planning Process – Disc Golf Course

Dear Ms. Bianconi,

The Whatcom Environmental Council appreciates the opportunity to comment on the proposed draft master plan for the Civic Field Complex, focusing on the ecological and human impacts of the proposed disc golf course.

While disc golf provides outdoor recreation to a variety of participants, essentially year-round, it has documented negative impacts to both the environment and wider public use of surrounding areas. Let's look closer, starting with language from the draft plan itself.

Page 35 of the Draft Master Plan describes the Disc Golf Course this way:

“In addition to these elements, the existing forest is also maintained intact with a new, light-footprint use of adding a frisbee golf course under the canopy of these trees, thus providing another pro-social use within this portion of the site.”

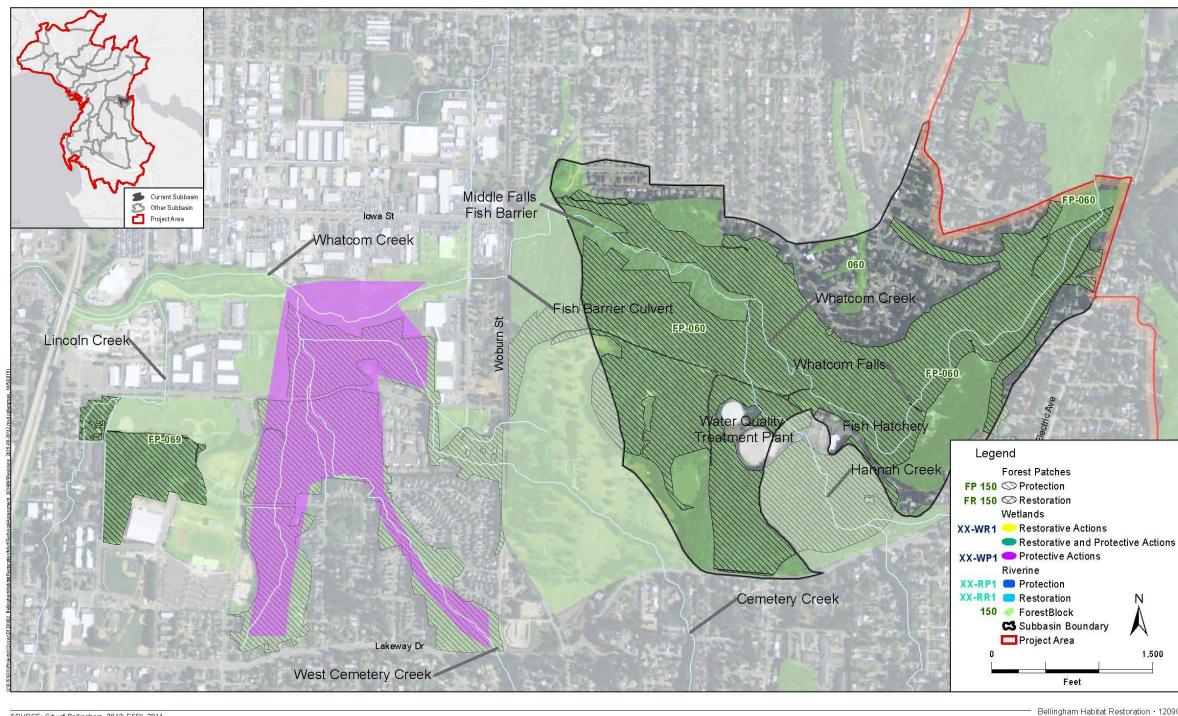
The existing forest (Fig. 1-3) is a diverse stand of mature mixed conifer and deciduous trees, well-developed understory, and in places thick underbrush. There is species diversity comparable to other larger forests in the Bellingham area. The site drains generally northward through several small drainages to wetlands on the property, and ultimately to salmon-bearing streams. The forest provides significant community benefits - stormwater detention, wildlife habitat, reduced heat island

impacts, visual and auditory beauty, and likely increased property value to adjoining parcels.

In 2003, the City completed a wildlife habitat assessment (<https://cob.org/wp-content/uploads/wildlife-habitat-assessment-2003.pdf>) that included this forest block (69). Here is what that assessment said:

"Block 69 is the forest block adjacent to the aquatic center and recreational ball fields. This block is a lowland temperate conifer forest and includes wetlands WH-2 and 3 with 1.9 acres. Lincoln Creek passes along the northern end of the block, but the riparian area is highly degraded and includes much open space and garbage. Coho and steelhead salmon and searun cutthroat trout use portions of this reach to rear and with restoration work, rearing habitat could be greatly improved. The forest block provides daytime refuge for terrestrial wildlife and nesting and foraging for a variety of avian species. The adjacent lawn areas of the recreational fields have limited foraging habitat for birds. The block is also quite isolated from adjacent blocks. Large terrestrial wildlife can move over the field areas into block 68, but smaller wildlife will have difficulties." (pg. 16)

The November, 2015 Final Bellingham Habitat Restoration, Technical Assessment (<https://cob.org/wp-content/uploads/final-bhrt-12-15-15.pdf>) highlights the value of this forest. Table B-8 shows this forest ranked 1st for restoration and 5th for enhancement; it only ranked low for permanent and regulatory protection because it was owned by the City. (pgs. B10-11)



SOURCE: City of Bellingham, 2013; ESRI, 2014

Bellingham Habitat Restoration v12002
Recommended Restoration and Protection Actions in the Upper Whatcom Creek Sub-Watershed
Figure 16

The Bellingham Habitat Restoration Technical Assessment went on to say the following about Forest Block 069:

“In addition, one habitat block downstream of the sub-watershed but within the larger Whatcom Creek watershed, specifically Forest Block 069, was included in the final recommendations because it provides opportunities to improve habitat connectivity.”

(pg. 116)

“Forest Block 069 Protection – Although located downstream of the Upper Whatcom Creek subwatershed, Block 069 in Lower Whatcom Creek could benefit from enhancement and support functions in Upper Whatcom Creek. This block is the farthest downstream and largest contiguous block in the Whatcom Creek watershed in relative proximity to Whatcom Creek, Lincoln Creek, and Racine Creeks. This block ranked as one of the high priorities for restorative actions, based on the final prioritization. It also may serve as an important node for wildlife habitat for the east-west habitat corridor along Whatcom Creek. The majority of Block 069 is City-owned (Civic Athletic Complex) and would benefit from interplanting of coniferous trees and removal of invasive species. During the review process, protection for this block was also listed as a priority by several local experts, due to the relatively high habitat value and important connectivity functions.” (pgs. 116-117)

The woods are already traversed by two 8' wide graveled public trails providing access for walking, bird watching, bicycling, and nature appreciation. They are bounded on the east and north by open fields already dedicated to recreational uses.

The Draft Plan language describes disc golf incorrectly as Frisbee™ Golf – disc golf uses smaller, harder discs that are generally moving much faster than a Frisbee™. The discs are known to steadily damage the bark on trees on the course, which are struck repeatedly during play. Many trunks require sheathing to avoid harmful loss of their protective bark.



Figure 1: Civic Field Forest, east edge along public trail, diverse vegetation



Figure 2 Civic Field Forest, typical interior view, healthy understory and ground covers:



Figure 3: Civic Field Forest, dense ground cover and mature trees

The language also claims the forest will remain intact once the “light footprint” course is installed and in use. This characterization demonstrates a lack of understanding about the effects of disc golf courses, which can be seen in Cornwall Park. (Fig 4-8).

The images below from Cornwall Park show clearly that a disc golf course results in an ecological desert of mature tree trunks surrounded by barren ground for 30-40 feet in every direction. Little underbrush or small trees survive the tramping of players looking for errant discs, players removing tree branches they find obstructing play, and pounding paths in the forest – in fact the Parks Department is now resorting to spreading truckloads of wood chips to cover the mud created along the course. The City Arborist told us that soil compaction from the large number of disc players has resulted in hemlocks dying, and that he will be restricting access to areas in Cornwall Park to allow for ecological recovery.

What will the proposed Civic Field Forest disc course actually look like in the forest?

First, imagine clearing nine swaths of forest, each one 15-40 feet wide by an average 240-260 feet long. The disc golf industry guidelines recommended for various holes are as follows.

By Par (PDGA Guidelines)

- [Par 3](#): ~100-350 feet (shorter for beginner tees, longer for pro).
- [Par 4](#): ~325-625+ feet.
- [Par 5](#): ~475-1000+ feet.

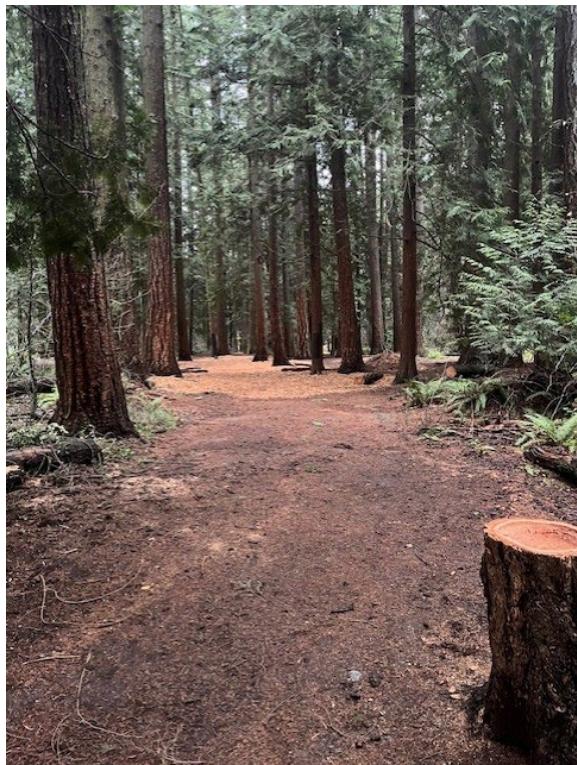


Figure 4: Cornwall Park, Disc hole #6



Figure 5: Sheathed trees, Cornwall Park



Figure 6: Cornwall Park Disc Golf course



Figure 7: Barren forest along disc golf course

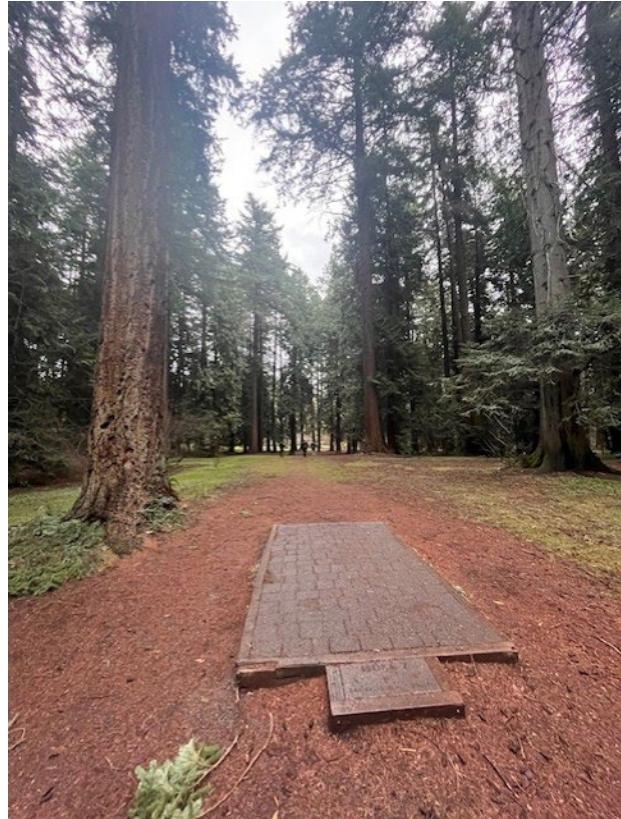


Figure 8: Disc hole cleared 40' wide

The City's proposed layout shows these disc golf course holes stretching nearly across the entire Civic Field forest, then zig zagging back and forth down the hillside toward the wetlands. The heart of the forest will be decimated with multiple cleared corridors.

It is generally acknowledged that some trees will be removed if they present significant obstacles to the disc throws. An estimated ten thousand cubic yards of organic debris will be torn out or disturbed during construction of the course, and heavy equipment required during construction will cause wider damage. But that's just the beginning.

Players will immediately start expanding their negative impacts on the forest, as they chase lost discs farther into the woods and underbrush. That is how a situation like we have now at Cornwall Park is created.

The Anacortes Parks Dept is experiencing this process firsthand, as disc golf players scramble off course, damaging the underbrush and organic material in Cap Sante Park, disturbing wildlife habitat, littering, threatening the safety of other park patrons, and creating bare soil zones subject to erosion.

Is it just a few players, hence manageable impacts? The Bellingham disc golf group counts 500 active members. They'll all likely be eager to play a new course, and we think that pressure, and demonstrated negative impacts will inevitably degrade the forest at Civic

Field to a shadow of its former self, with potential negative impacts to the wetlands and streams just to the north.

We encourage the Parks and Recreation department, and City decisionmakers, to reach out to City staff with expertise in forests and natural resources. Our conversations with such staff have revealed strong concerns about whether the course can be constructed and operated without many negative impacts on the existing intact forest, its wetlands, and associated species. We understand that the City's Natural Resources Division has already submitted comments to the Planning staff, in opposition to the proposal. This opposition is based on ecological and resource management grounds, supported by professional training and experience in environmental management.

Given the list of negative impacts which are virtually certain to occur based on data from other communities and our own, are there alternative locations for this otherwise fun and challenging sport?

While some golfers would prefer a forest setting, disc golf courses have been built and thrive in sites without trees to the extent that courses in wide-open fields or park settings are often referred to as "links-style," "park-style," or "prairie" courses.

Such non-woodland courses can be found in our own backyard, from VanderYacht Disc Golf in Ferndale to Deception Pass Golf Center on Whidbey. There may be other suitable, publicly owned properties the City could consider, where disc golf could be played without imperiling natural resources held in trust for all citizens.

As a start, we suggest the following areas be considered for more study:

North side field behind Civic Stadium – 1.5 acres, currently used for occasional track and field events, open and safely separated from other park users. A net fence to protect adjacent woods would mitigate impacts.

Multi-use outfields, Civic Field Complex - 1.8 – 2.0 acres– these fields are proposed to have major reworking for all season use, but they could possibly have a winter season as a disc golf course with removeable baskets for seasonal baseball and soccer use.

Last but not least, has the City contacted the Professional Disc Golf Association Environment Committee (www.pdga.com) to assist in their planning? The PDGA has a *Throw Green Initiative* to help address many of the most worrisome impacts of disc golf courses, wherever they occur.

We hope you will take the time to fully investigate the demonstrated problems with this proposal, listen to your staff's professional objections, and remove disc golf from consideration in the Civic Field Forest.

Sincerely,

Rodd Pemble, Board Member

On behalf of the Whatcom Environmental Council Board of Directors

Cc Mayor Kim Lund
 Bellingham City Council