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October 29, 2025

To: Bellingham Mayor and City Council

Subject: Urban and Community Forests, Bellingham Plan

The Bellingham Plan states the City's commitment to urban and community forests. This commitment will not have any real impact, however, if the Bellingham Plan does not improve management to protect urban and community forests, including on private land.

Around five years ago, what was once an urban forest, identified by the City as a primary wildlife habitat area,¹ became a clearcut for future urban development. This area is known as Samish Heights.²

Figure 1: Samish Heights Logging, picture taken May 2020



The consequences of poor forestry practices are not difficult to find within the City. Before the trees were cut, city studies identified the former urban forest in Figure 1 as significant wildlife habitat, ranked as one of the highest for overall biodiversity function score, 7th highest priority for protection actions within the forest habitat group, 8th highest priority for regulatory protection, and highest connection and fragmentation attribute score.³

¹ See BMC 16.55.470 and the following City permits: CAP2016-0036, STM2016-0068 and SEP2016-0017

² We provide this property as just one example of forest practices within the city and/or urban growth area. There are others.

³ See [Final Bellingham Habitat Restoration, Technical Assessment](#), November 2015 Also see Figure 8, [2021 Wildlife Corridor Analysis](#), pg 19

An urban forest within the city was lost. History will repeat itself if the Bellingham Plan fails to ensure that forest practices in the city don't adhere to conserving tree canopy and protecting critical areas.

This history of the Samish Heights logging helps demonstrate the problems with forest practices in the city:

- In May 2016, the RJ Group for Samish Heights, Inc. (Samish Heights) **filed an application** with the City to partially log the site.
- On June 26, 2017, the **City issued** a Critical Areas and Clearing Permit subject to several conditions, including limiting the harvest to less than 30% of marketable timber.
- On August 4, 2017, Samish Heights **filed a** Forest Practices Application with the Department of Natural Resources (DNR).⁴
- On August 30, 2017, **DNR issued** a Class IV-General Forest Practices Permit, **conditioned on** compliance with City of Bellingham conditions and/or mitigation.⁵
- On November 14, 2018, Samish Heights **terminated** its 2017 forest practices permit.⁶ Samish Heights said "[t]he timber harvest is complete."⁷
- On November 21, 2018, DNR **closed** the 2017 Forest Practice Permit.⁸ On the same day, Samish Heights submitted a **new** Class III Forest Practices Application⁹ covering 68 acres on the southern part of what was originally included in the 2017 application. This application increased the amount of harvested timber to 95% of the area and 1,300 million board feet of timber. Samish Heights declared that they did not plan to convert to non-forest uses for 10-years.¹⁰
- On December 6, 2018, DNR **approved** the application, no longer requiring compliance with the city's conditions of approval and mitigation approved on June 26, 2017 despite the earlier application covering the same property declared there would be a conversion to non-forest use.
- On November 20, 2019, Samish Heights submitted **another** Class III Forest Practices Application¹¹ to harvest additional area, primarily for the purpose of building roads "to improve access to site".

Figure 2: Road and culverts on Samish Heights (2020)



⁴ Forest Practices Permit #FP2815967 – <https://fortress.wa.gov/dnr/protection/fparssearch/FPASearch.aspx>

⁵ City permits: CAP2016-0036, STM2016-0068 and SEP2016-0017

⁶ Letter from The RJ Group to WA State Department of Natural Resources, November 14th, 2018

⁷ November 14, 2018 letter from The RJ Group. However, anecdotal information and subsequent forest practice applications indicate that only part of the northern area was harvested.

⁸ Notice of Decision, FPA/N No: 2815967, 11/28/2018

⁹ Forest Practices Permit #FP2816729 – <https://fortress.wa.gov/dnr/protection/fparssearch/FPASearch.aspx>

¹⁰ The Samish Heights Inc. [website](#) describes a "significant master-planned residential development".

¹¹ Forest Practices Permit #FP2817283 – <https://fortress.wa.gov/dnr/protection/fparssearch/FPASearch.aspx>

It does not appear that the 2017 critical area and clearing permits issued by the City have been enforced. Rather than 30% timber harvest, parts of the site saw 95% clearing. Rather than comply with city critical area requirements, it appears that forested wetlands were cleared under DNR review.

The 2018 and 2019 forest practice permits issued by DNR allowed more than one mile of new roads in Samish Heights. While Samish Heights indicated that they would reforest the area with 250 seedlings per acre, starting in March 2020, there is little evidence that reforestation has ever been accomplished or inspected by DNR or the City. Similarly, while Samish Heights said that they would do competing vegetation checks every two years, it appears that the property now includes a number of invasive species on the site, as predicted.¹² See Figure 7 and Figure 8 showing aerial views in 2016 and 2022.

What happened at Samish Heights can happen again. The City can “adopt and enforce ordinances or regulations...for forest practices...within urban growth areas.”¹³ Some of the reasons for these “non-conversions” in cities and urban growth areas might be due to provisions in the [Forest Practices Act](#). The City can take steps to close those loopholes by adding a policy, as suggested below, to the Bellingham Plan, as well as adopting and enforcing regulations for forest practices within the city.

New Policy: Support amendment of the Washington State Forest Practices Act and forest practice rules to ensure state forest practices within urban growth areas are consistent with and implement Bellingham’s development regulations and Urban Forest Plan.

HB 1181 and the Bellingham Plan

Carrying out a commitment to urban and community forests requires a proper foundation being built within the Bellingham Plan. We believe that foundation has not been built and further, that the plan presented to City Council does not meet the requirements of the Growth Management Act regarding the role urban and community forests play in addressing reduction of greenhouse gas emissions and climate resilience, air and water quality, and fish and wildlife habitat.¹⁴

In 2023, the Legislature considered and adopted [HB 1181](#), a bill “relating to improving the state’s climate response through updates to the state’s planning framework.” A striking amendment to the original bill added a requirement for the land use element to designate the use, location, and distribution of “**urban and community forests**.”¹⁵

Two years earlier, the legislature found that urban forests contribute multiple benefits and the impacts of climate change can be improved by increased tree canopy.¹⁶ A new definition was added for “urban and community forest” or “urban forest” that included private lands.¹⁷

The Bellingham Plan defines “community forest” and although the term “urban forest” is used in several instances within the Bellingham Plan, it is not defined. When we raised our concerns¹⁸ that the draft Bellingham Plan did not include non-city parcels in a definition of “urban and community forests”, staff

¹² CAP2016-0036 had a finding that the “number of invasive species on this site will increase”.

¹³ [RCW 76.09.240](#)

¹⁴ See RCW 36.70A.020(9), (10) and (14)

¹⁵ See [1181 – PS2 AMH APP ALLI 259](#), February 9, 2023.

¹⁶ [ESSHB 1216](#), Section 1

¹⁷ [ESSHB 1216](#), Section 4, codified at [RCW 76.15.010\(7\)](#)

¹⁸ See [letter](#) dated September 18, 2025.

responded: “[d]ue to lack of public access, control of use and ownership and related issues only boundaries for city-owned community forests are shown.”¹⁹

Urban forests do not necessitate public access. However, the Growth Management Act directs that a comprehensive plan be implemented, including through development regulations²⁰ which limit use and clearing of land.

Bellingham cannot meet the GMA climate element requirements without urban forests on private land being included.

- 40% of Bellingham is covered by tree canopy and 42% of the entire Urban Growth Area.²¹
- “The majority (54%) of tree canopy within the City and Urban Growth Area was found on private land.”²²
- Tree loss accounts for 12% of the estimated communitywide greenhouse emissions in 2022.²³
- Limiting “tree loss and support low-carbon land practices ...”²⁴ is a key GHG emission reduction strategy.

Urban forests and tree canopy play important roles in creating or worsening climate impacts to 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.²⁵

“GHG reduction and resilience planning is fundamentally a matter of equity.”²⁶

“Bellingham’s urban forest plays a vital role in combating climate change....areas with higher tree canopy...are among the coolest spots in the City...paved area[s] like City Center are hot compared to areas with more tree canopy.”²⁷

State climate planning guidance recommends the city review “maps that identify areas with less tree canopy/higher sensitivity to extreme heat and areas with a higher poverty rate/lower adaptive capacity...”²⁸ This work was done in the Draft Urban Forest Plan²⁹ and can also be viewed online at the Tree Equity Score website (<https://treeequityscore.org/>). Community forests, as depicted on page 109 of the Bellingham Plan, are not located equitably within the city.³⁰

¹⁹ Email from Anya Gedrath and the Bellingham Plan Team, September 24, 2025

²⁰ [RCW 36.70A.040\(3\)](#)

²¹ [City of Bellingham Urban Forest Plan, Draft April 2024](#), pg. 16

²² [City of Bellingham Urban Forest Plan, Draft April 2024](#), pg. 19

²³ [Whatcom County 2022 Greenhouse Gas Emissions Analysis](#), Figure 4, pg. 11

²⁴ [Whatcom County 2022 Greenhouse Gas Emissions Analysis](#), pg. 18

²⁵ See Climate Element Planning Guidance, [Menu of Measures](#), #418

²⁶ [Climate Element Planning Guidance – December 2023](#), pg. 72

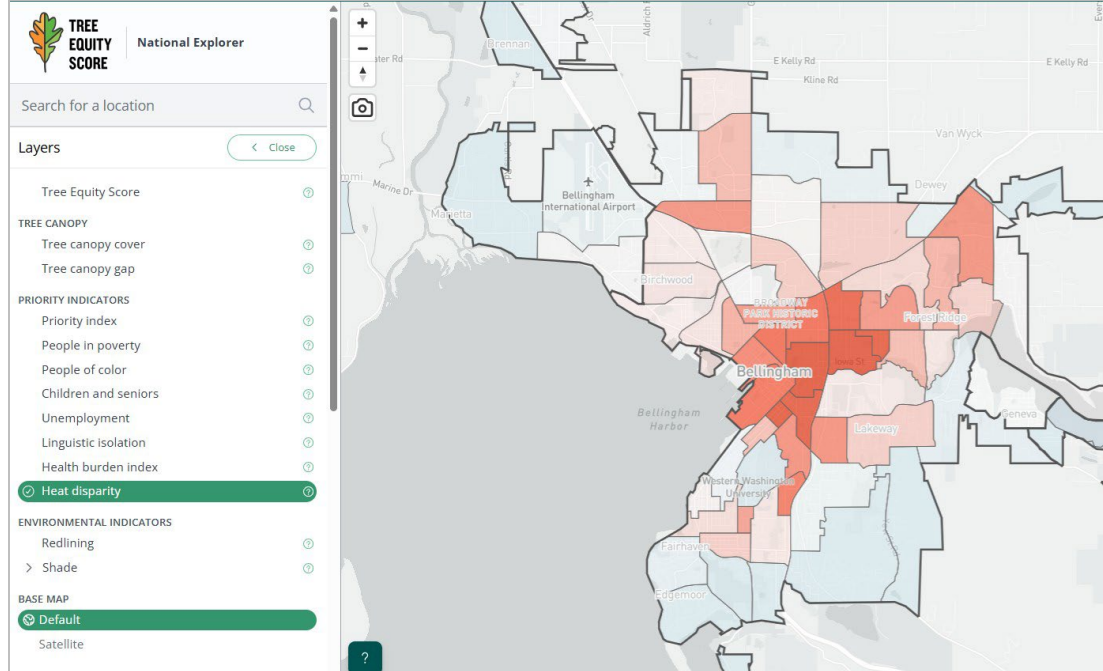
²⁷ [City of Bellingham Urban Forest Plan, Draft April 2024](#), pg. 7

²⁸ [Climate Planning Guidance – December 2023](#), pg 29

²⁹ [City of Bellingham Urban Forest Plan, Draft April 2024](#), Figure 16, pg. 22

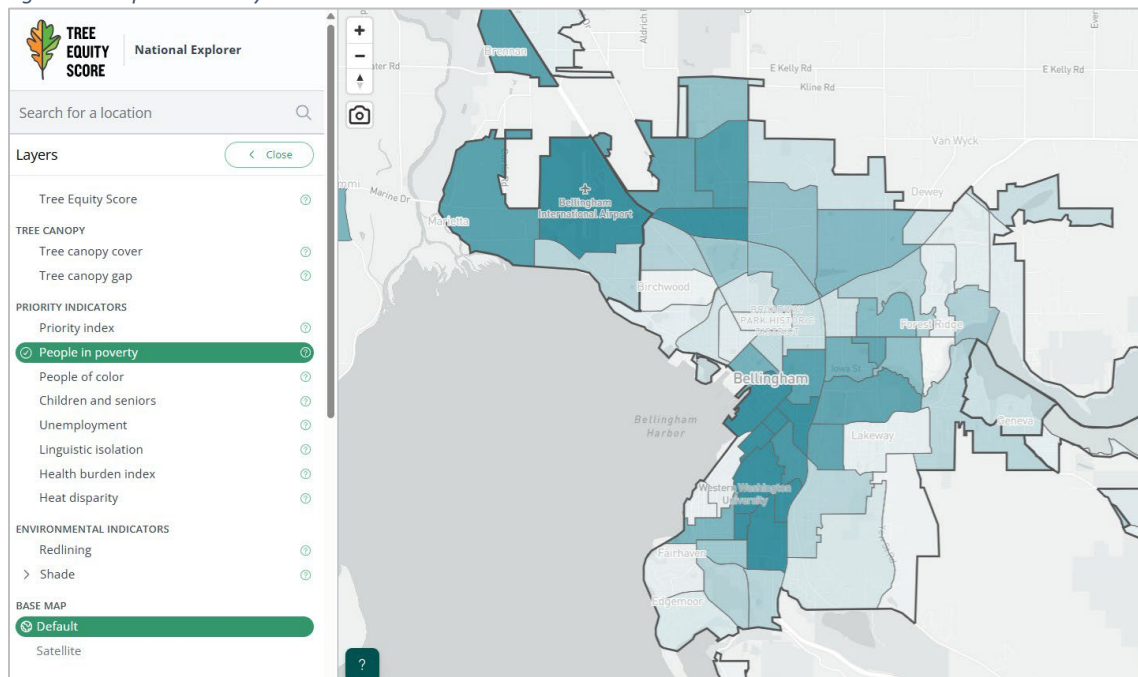
³⁰ The Bellingham Greenways Advisory Committee approved recommendations (June 6, 2024) that addressed diversity, equity and inclusion in Bellingham Parks and Recreation. Their findings illustrate park acres and trail miles per 1,000 residents is not equitably distributed. Neighborhoods “with greater diversity and lower income levels...[are] underserved when it comes to access, proximity to park acres and trails.”

Figure 3: Heat Disparity Score



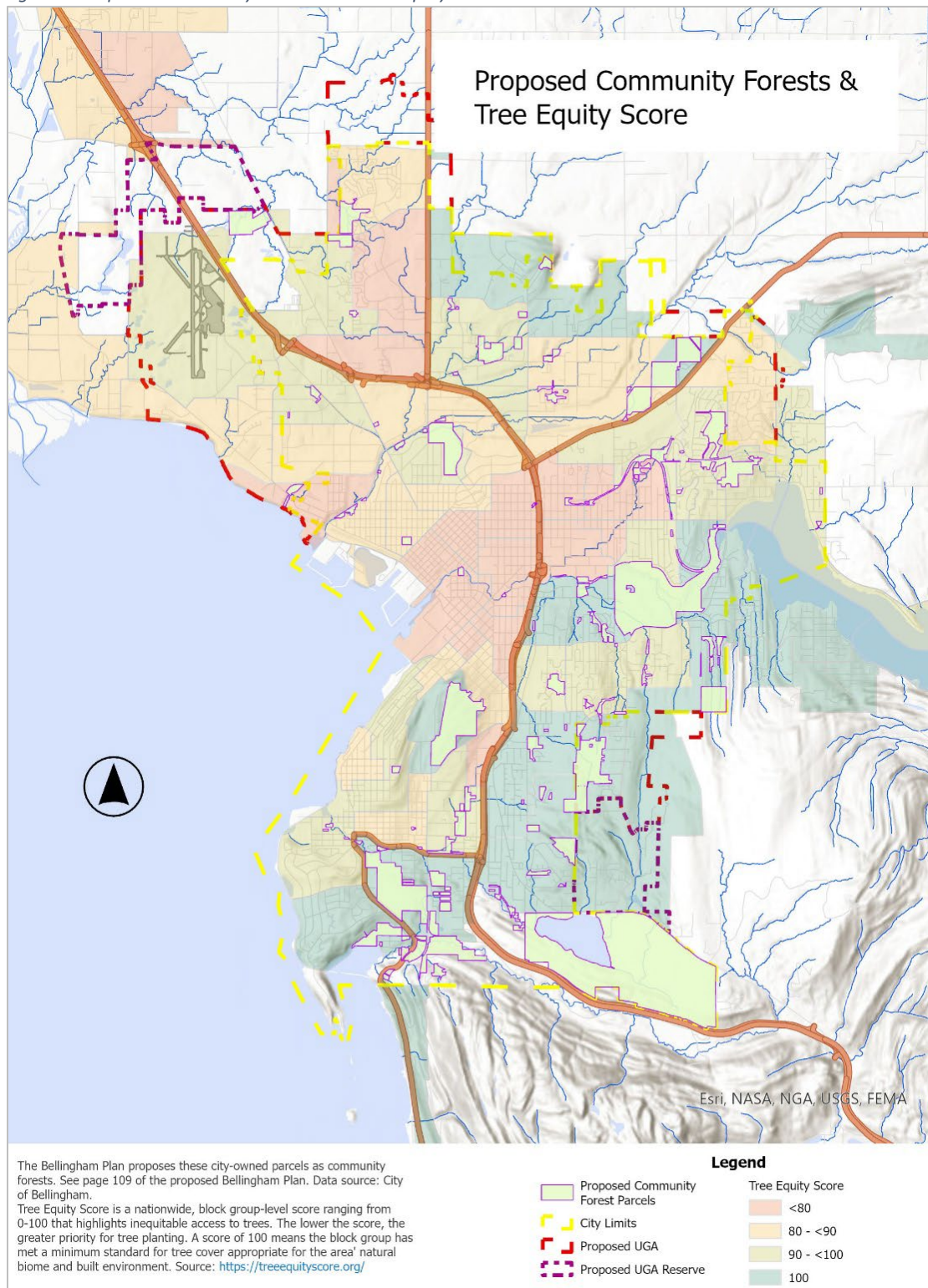
York and Roosevelt neighborhoods are examples of areas with a 13 to 14 degree heat disparity. The forested areas around Civic Field provide a place where low-income, vulnerable populations and overburdened communities can find refuge during extreme heat events. Source: Tree Equity Score <https://treeequityscore.org/>

Figure 4: People in Poverty



The City must consider how climate change impacts overburdened and vulnerable communities, such as ones with higher rates of poverty. Community forests are not equitably distributed throughout the City and additional measures to protect and increase tree canopy and urban forests in these areas is necessary. Source Tree Equity Score <https://treeequityscore.org/>

Figure 5: Proposed Community Forests and Tree Equity Score



Sources: GIS data for Tree Equity Score from (<https://treeequityscore.org/>). proposed Community Forest data from City of Bellingham Planning.

To ensure that the policies of the Bellingham Plan address GMA requirements for urban and community forests, we recommend the definition of community forest be amended as follows:

Urban and Community Forest | Land in and around human settlements occupied or potentially occupied by trees and associated vegetation. ~~as defined by the City of Bellingham.~~ Community forests include City-owned parcels greater than 1-acre with a tree canopy coverage greater than or equal to 50% of its area, or significant forest blocks of publicly held property (title or easement) as shown in Figure). “Urban forests” include private lands on parcels greater than 2-acres with a tree canopy coverage greater than or equal to 50% of its area.

Why proposed goals and policies fall short of actions that create results

The Department of Commerce informed local government that a “set of policies limited to “study” or “consideration” will not reduce GHG emissions.”³¹ Yet the Bellingham Plan is replete with such policies. “Encourage”, “work with”, “develop and implement”, “adopt” are routinely used when addressing trees and urban forests. The Bellingham Plan does not show how the numerous policies will get implemented. Policies don’t mean action unless they are written as such.

One measurable policy that we recommend is to increase tree canopy cover over existing conditions. The Bellingham Plan should establish the tree canopy target that will be refined with an Urban Forest Plan.

New Policy: The city will set a city-wide target to increase tree canopy cover above 40% , implemented through adoption of an urban forest plan, capital facilities plan and development regulations.

The mapping and definition of community forest

Community forests can be quite distinct from an urban forest. Public access might be one component of a community forest.³² Community forests are where vulnerable populations and overburdened communities might take refuge during a heat event.

The map in the Bellingham Plan (pg. 109) is difficult to view due to its scale. Bellingham Planning staff sent the digital map files for our review and analysis. What we found when we reviewed the maps were significant deficiencies in how it was mapped in the draft plan. These deficiencies also point out concerns with the definition.

We found several examples of city-owned parcels with significant forest blocks that were not mapped as community forests. These areas include the forests around Civic Field³³ and near Chuckanut Creek and

³¹ [Climate Element Planning Guidance – December 2023](#), pg. 64

³² Some community forests might restrict public access to protect sensitive habitat or species.

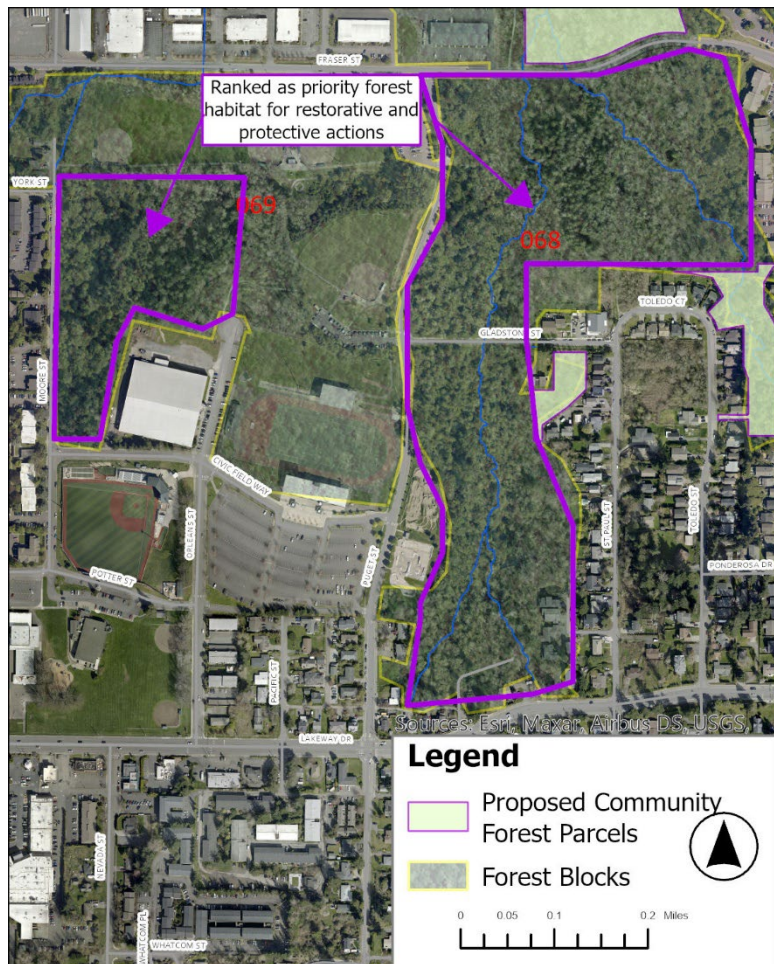
³³ Forest blocks near Civic Field are adjacent to neighborhoods with heat disparity of 13-14 degrees and more than 50% of the population in poverty. Forested lands adjacent to Civic Field were not mapped as Community Forest in the Bellingham Plan. See [Civic Athletic Complex Planning website](#), [Phase 1 technical report](#) and [technical maps](#) of site assessments. Forest Blocks 068 and 069 in this area were prioritized for restorative actions in the [Final Bellingham Habitat Restoration, Technical Assessment](#), November 2015, Table 21, pg. 66-67 of pdf, with Block 069 ranked the 6th highest priority for restorative actions in the entire city.

Woodstock Farm. See Figure 6 and Figure 9. Critical forested wildlife habitat, such as at [Post Point](#) was not mapped as a “community forest”. See Figure 10.

The city owns forest lands outside the urban growth area that are not included in the Bellingham Plan. These forest lands were purchased for the city’s Greenways Program, Lake Whatcom Watershed or as wetland mitigation sites. These are city assets and should be included in the Bellingham Plan. See Figure 12 and Figure 13.

Limiting the definition of community forest to “city-owned” property misses other public ownership that should be included as community forest. One of the examples that we have identified is the forested hillside of Western Washington University’s campus just west of Sehome Arboretum. See Figure 11.

Figure 6: Forests near Civic Field



The use of “city-owned” property also misses property where the City or another public agency or land trust holds a conservation easement. See Figure 9, Figure 12 and Figure 13.

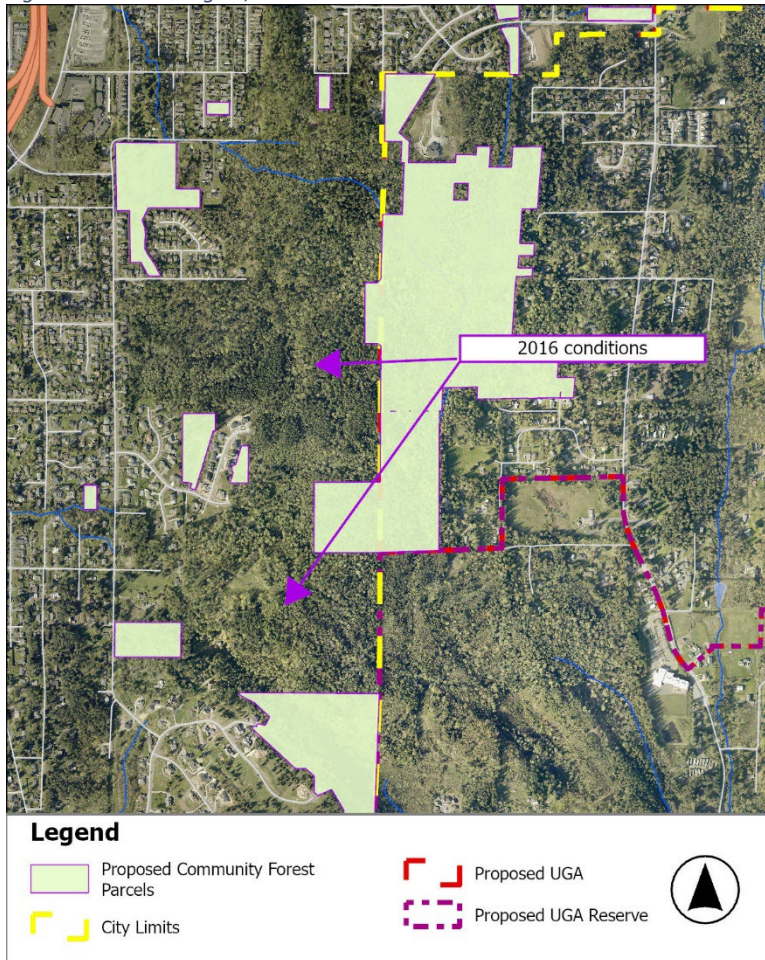
Recommendation: Direct staff to prepare a new map of “community forests” to include forested city and public property as described in this letter.

Sincerely,

David Stalheim, submitted individually and on behalf of
Whatcom Environmental Council

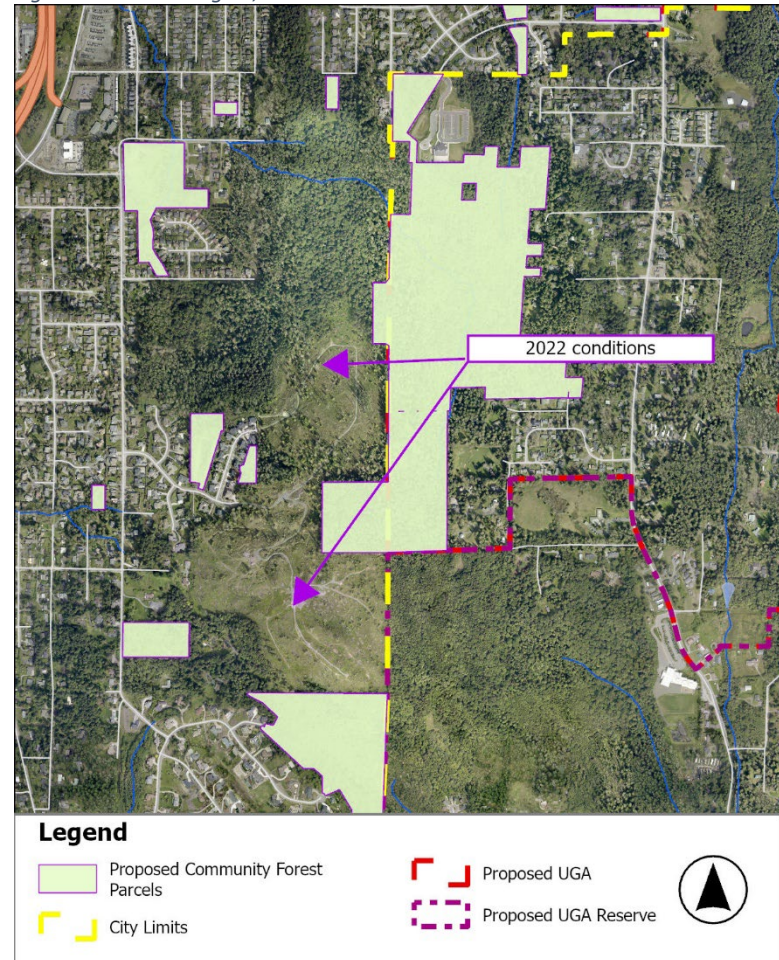
Attachments: Figures 7 through 15

Figure 7: Samish Heights, 2016



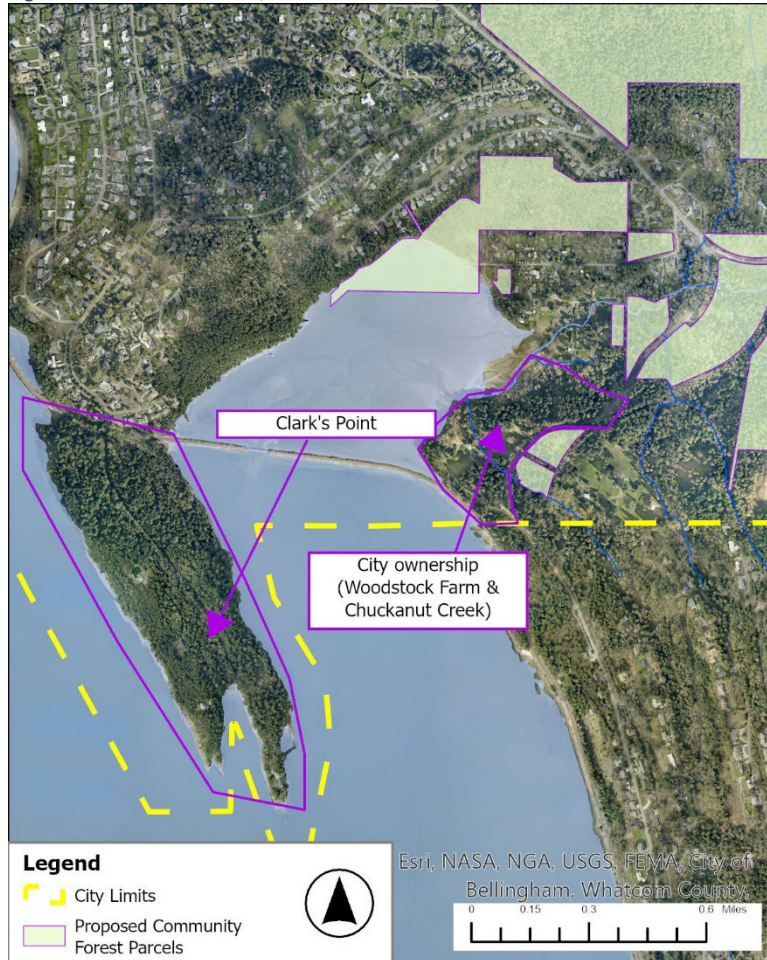
Source: Bellingham GIS
https://maps.cob.org/arcgis4/rest/services/Imagery/Photo_2016/MapServer

Figure 8: Samish Heights, 2022



Source: Bellingham GIS
https://maps.cob.org/arcgis4/rest/services/Imagery/Photo_2022/MapServer

Figure 9: Chuckanut Creek, Woodstock Farm, Clark's Point



Forested lands adjacent to Chuckanut Creek and Woodstock Farm were not designated as Community Forests. Clark's Point, while privately held, has conservation easements to protect the forested lands.

Figure 10: Post Point Forest



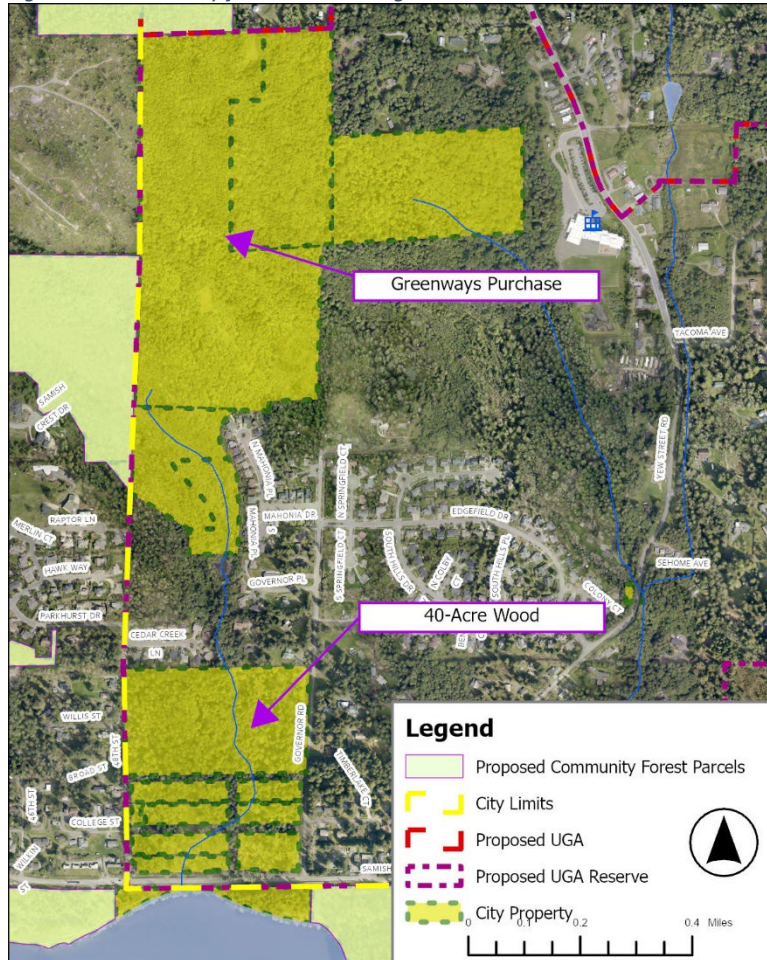
A significant heron rookery exists in the forests adjacent to the Post Point Wastewater Treatment Plant. The City recently purchased property to increase protections around the rookery. For more information, see <https://cob.org/services/environment/restoration/post-point-heron-colony>

Figure 11: Sehome Arboretum and WWU Forest



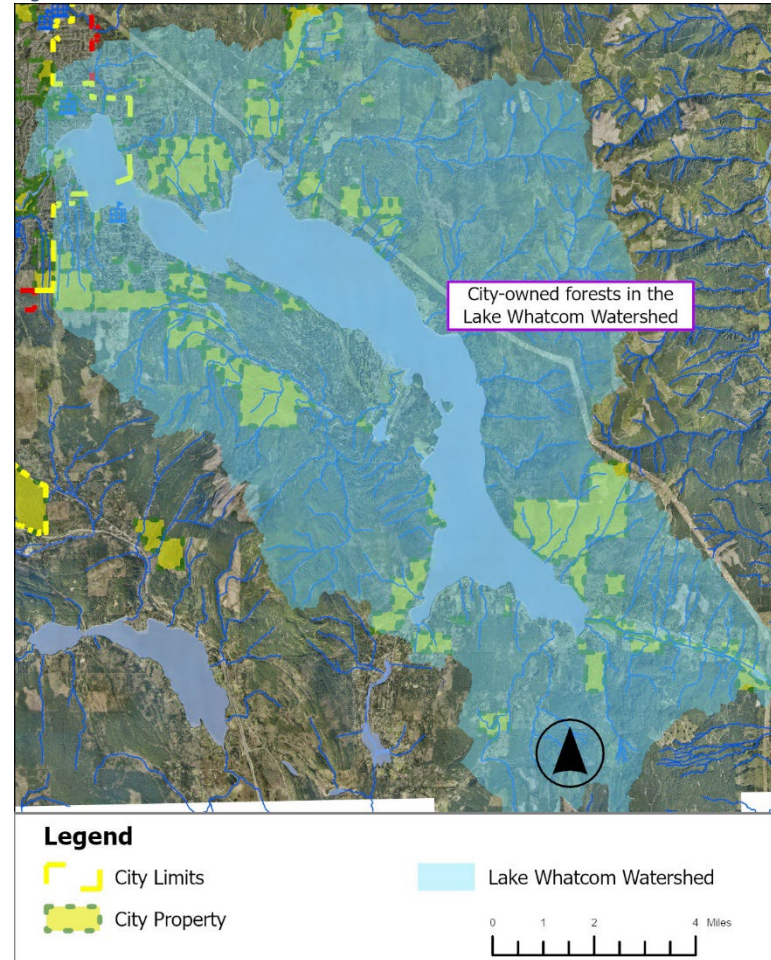
The property to the west of Sehome Arboretum, owned by Western Washington University, were not included in the designation of Community Forests.

Figure 12: Community forests connecting Samish Crest to Lake Padden



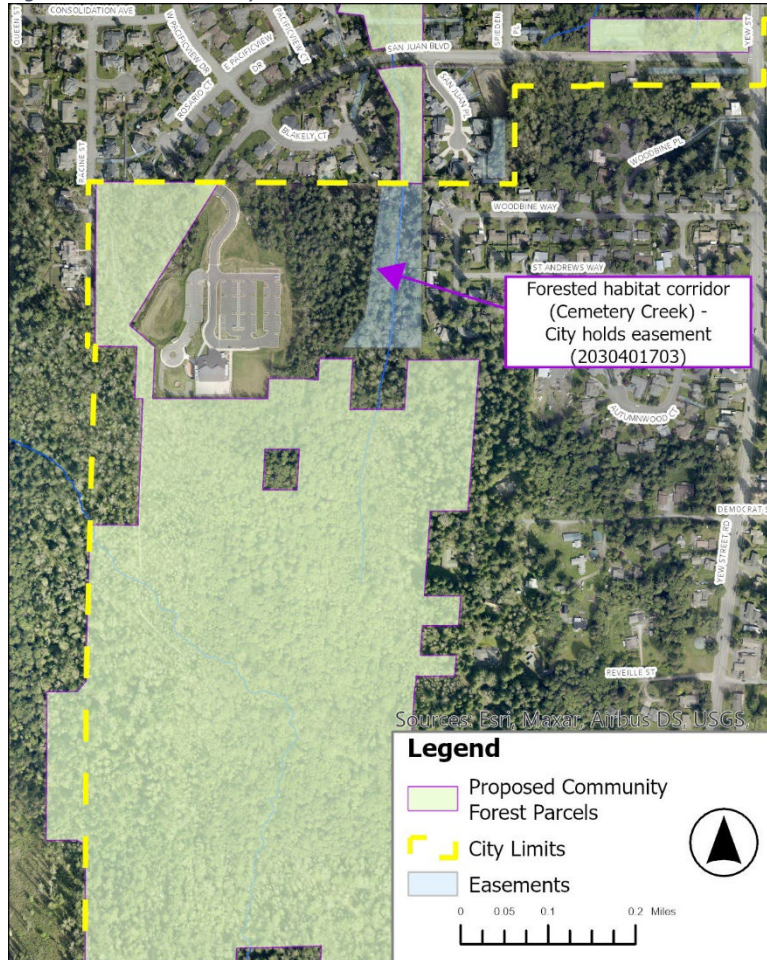
Through the Bellingham Greenways Program, urban forests outside the city and Urban Growth Area have been purchased. These properties are included in the proposed Urban Growth Area Reserve but were not included in the inventory of the city's "community forests".
Source: Bellingham GIS data).

Figure 13: Forests in Lake Whatcom Watershed



The city has purchased forest lands within the Lake Whatcom Watershed for protection of water quality. These forest lands were not mapped as Community Forests in the Bellingham Plan.
Source: Bellingham GIS data

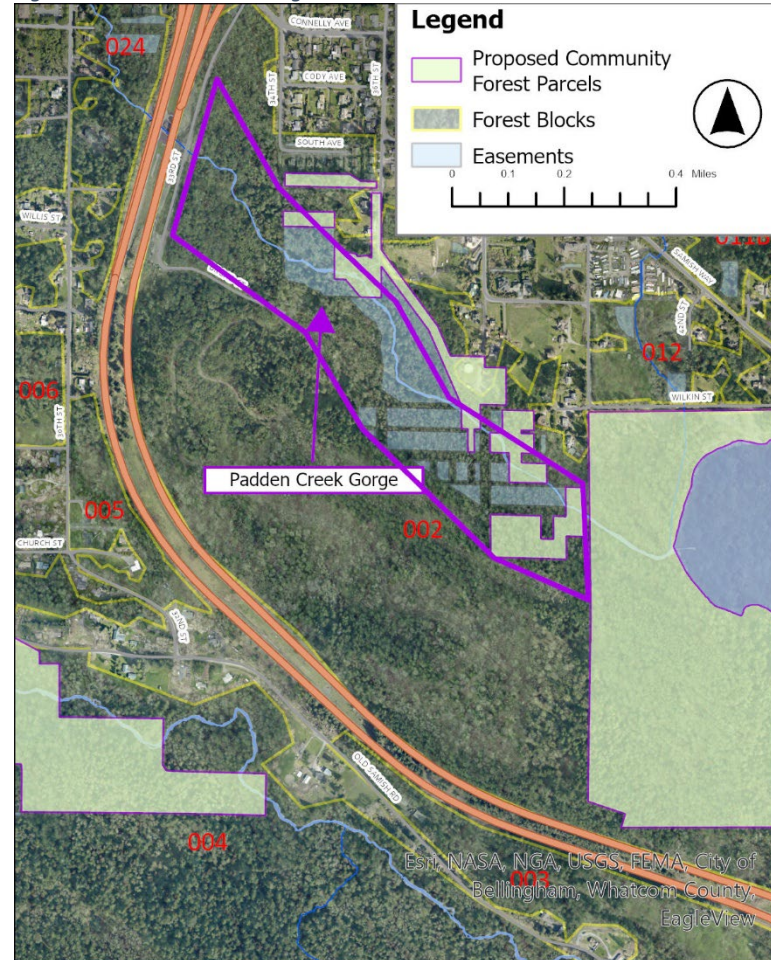
Figure 14: West Cemetery Creek Easement



The city holds several easements from San Juan Blvd down to Lakeway for trail and conservation purposes. These easements are not included in the definition of community forests.

Source: City GIS data (d_easements)

Figure 15: Padden Creek Gorge Easement



Source: Bellingham GIS data