

Whatcom Environmental Council

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TO: Lake Whatcom Management Program Partners
Bellingham City Council
Whatcom County Council
Lake Whatcom Water and Sewer District Commissioners

RE: Draft Lake Whatcom Management Program 2025-2029 Work Plan

The Whatcom Environmental Council (WEC) would like to make the following comments on the draft Lake Whatcom Management Program 2025-2029 Work Plan. We appreciate everyone's hard work over the years to protect Lake Whatcom, and make these comments in the spirit of continuous improvement to make things even better. Thank you for this opportunity to comment.

Overarching comments on Draft Plan

1. Does a real plan for implementation by staff exist? This document reads not like an implementable plan, but as the executive summary of a plan meant to give the public a high-level briefing. Such a high-level public summary makes good sense, and may be what most people desire, but there ought to be discussion making it clear that a real implementable plan exists that contains details, responsibilities, timelines, deliverables, etc., and links to those details should be provided so the more curious public can get into the weeds if they want. A list of "Resources" is included at the end of the document where some of the details may be available, but there are no links or references provided to these "resources" in the brief descriptions of the plan's elements, so the connections to this list of information are difficult to make. Please provide in this document a description of where the detailed plan is at, and links within the descriptions of each program element to the more detailed plans and other resources that apply to it.

2. The plan as drafted is hard to follow. Upfront there are listed six "Goals" and then six "Objectives," but the goals and the objectives are not linked, so appear to be independent of each other. Connections should be made between goals and objectives. Then there are some random discussions of Phosphorus, Accomplishment Timelines, and Metrics that are not tied to any goals or objectives, and would be better placed within program elements when possible. Then the major part of the draft plan describes the twelve Program Areas and associated Objectives, but those program areas are not linked to previous Goals and Objectives, and the Objectives in this section are different than the Objectives in the previous section. Some of the six Objectives early in the draft plan include important points, that are then not carried through to the actual Program Area discussion further on. The plan's organization and terminology need to be improved so it is clear how Goals, Objectives, and Program Areas are useful and related.

3. In the statement from the Mayor, Executive and General Manager it is stated the plan is on track to provide “healthy habitat for wildlife”, yet there are only a couple of passing references to wildlife in the entire document. Why is there not an entire Program Area on Wildlife like there is for recreation, forest management, and utilities & transportation?

Program Area 1 – Land Preservation

1. There appears to be some overlap between program area 1.2 Property Management and other program areas such as Recreation, Transportation, and the new Program Element on Forest Management since these other program areas also include property management discussions. Perhaps the Land Preservation program section should focus just on the acquisition and preservation efforts, and leave the management of those lands to the other more focused program areas.
2. Property Management section 1.2.2 describes a valuable new document (when will it be released?) that the City will use to make decisions about recreational development in the watershed. For consistency does a similar document exist for county recreational decision making? Should this guidance be linked to and discussed more in the Program Area 6 – Recreation section where impacts from recreation are discussed?

Program Area 2 – Stormwater Management

1. Section 2.2 on Residential Stormwater Solutions relies heavily on education, encouragement, incentives, and voluntary actions. Information should be added to this section to describe whether voluntary actions are making sufficient progress, and what the threshold points are being monitored for a decision to start ramping up over time a more regulatory approach in addition to the education, encouragement and incentives.

Program Area 3 – Land Use

1. Section 3.1 talks about providing consistency with land use goals, policies and development regulations, yet there is no discussion about whether consistency of efforts between the various jurisdictions currently exists. Please describe how goals, policies and regulations between jurisdictions align or don't.
2. Section 3.1.3 discusses new Native Vegetation Protection Areas created by City code (provide link to city code or program details), and there are also reporting metrics listed that measure this for just the City. If consistency is important why does this only seem to apply to the City? Does the County have similar requirements? If the County does not have such requirements why not?

Program Area 4 – Monitoring & Data

1. The “Focus on Phosphorus” section that starts on page 12 and the Metrics discussion on page 17 would make more sense if incorporated into this Program Area. The Focus on Phosphorus may make some people think that is all that is important which is not the case (see comment 3 below). Further, forest resource lands in addition to developed areas, need to be identified as a source of Phosphorus as well as other water quality impairments. Water quantity and streamflows should be monitored and referenced because water quality impairment directly relates to streamflow quantities.
2. Again, there is mention of lots of great monitoring results, data, reports, and assessments, but there are no links or references provided to where a person could review those things for meaningful details. Please include these links.
3. There is a lack of information describing what is and is not actually tested for other than phosphorus and bacteria. As a lake that people drink from, and swim in, there is interest if the water is tested for a variety of chemicals such as benzene, PFAS, pesticides & herbicides, pharmaceuticals, etc. that can come from

stormwater, boats, and septic systems? Please describe in more detail what is and isn't tested for, where people can find those test results, and how such testing informs decisions about management of things like boats on the lake, septic system inspections, need for stricter chemical controls, etc.

Program Area 5 – Hazardous Materials

1. Again, this is a high-level overview of good ideas, but does an actual Hazardous Materials Reduction and Management Plan exist that focuses on Lake Whatcom? If so a link or reference should be provided, and if not one should be created. It needs to show best practices, spill plans, etc. for specific users and activities, such as from automobiles, boats, landscaping, etc.
2. It has long been understood that the best and most cost-effective way to prevent impacts from hazardous materials is to not use them in the first place when possible. There needs to be added to this section some discussion and **emphasis** on reducing the use of hazardous materials in the watershed, not just the proper use, storage, and disposal of them. Is monitoring robust enough to identify materials that are problematic and may need a more regulatory approach?

Program Area 6 – Recreation

1. There is a real tension between protecting water quality and increasing recreational infrastructure and activities within the watershed. Things such as illegal trail building, increasing parking lots for more recreational visitors, more car traffic on watershed roads, more boats on the lake, more dogs pooping on trails, etc. all have an impact. The plan needs to discuss how decisions that may increase these recreational impacts are considered. In section 1.2.2 there is mention (no details) of a new guidance document that the City is creating to perhaps address such considerations and conflicts. That guidance should be discussed in this section and should be consistent with County considerations as well
2. Section 6.1.4 seeks to ensure recreational opportunities offered through third-party vendors comply with water quality goals and land use regulations. This idea should be expanded to ensure that **all** recreational activities comply with water quality goals and land use regulations. A new section 6.1.5 should be added that flips this consideration to include – water quality goals and land use regulations are regularly reviewed to ensure they are robust enough to protect the lake from increasing levels of recreation. Is there any policy that states that water quality is a higher priority in the watershed than recreation?
3. There has been some discussion in the community about the desire to create and promote events, large organized trail runs and bike rides, races, fishing derbies, car rallies, etc. in the watershed. Is there a policy to assess such activities, and discourage or ban such activities if they would directly or indirectly impact water quality, or if local tax payers would have to foot the bill to mitigate those activities?

Program Area 7 – Aquatic Invasive Species

1. Nowhere in this section, or the associated “resources” at the end of the Plan, are the actual requirements for this aquatic invasive species (AIS) program spelled out. We appreciate how quickly this program was put together and launched, and the effort that has been expended, but since its inception this program was acknowledged to be a leaky sieve since staffed inspections are only available during certain hours and months, and since there are known private launch areas where inspections can be avoided. Since it would only take one boat with Zebra Mussels entering the lake to infest the entire lake, and since efforts to remove such invasive species after infestation have not shown much success, such holes in the inspection system represent a real risk. This section of the Plan should discuss how continuous improvement efforts for this AIS program are working to decrease the holes in the inspection program, and what thresholds are used to decide whether stronger protections such as closing all boat launches when inspection are not available, banning private boat launches, banning boats that are not permanently docked on the lake, etc.

This section should make clear how the calculations of risk were done that shows the potential for millions of dollars of impacts from invasive species is so minimal that it is OK to continue to allow people to use boats for fun on our drinking water source.

2. Other reporting metrics that should be added in the spirit of continuous improvement would be:
 - Number of private boats launches or hand launch sites available on the lake.
 - Percentage of total hours in the year that public launch facilities are available without inspection personnel present.

Program Area 8 – Utilities and Transportation

1. Again, the main problem with this section is the lack of any detail to allow the reader to know what is really being discussed or done. For example, what does “Provide sewer service to areas with OSS systems when appropriate” mean? Has analysis been done that shows septic systems are negatively affecting the lake? Has analysis been done to determine whether sewer service is better than septic for the lake when sewer overflows are considered? Has analysis been done, or policies put into place, to ensure that running a sewer line through an area would not enable more development? For another example, what does “Employ road design standards to reduce impacts to water quality” mean? Does that include a commitment for use of pervious surfaces?
2. Nowhere in the draft plan is there information about the use of the City of Bellingham’s Middle Fork diversion into Lake Whatcom. This diversion can help maintain water levels in the lake and Whatcom Creek, but if taken July through September could negatively affect stream flows for salmon and steelhead runs in the main stem and middle fork of the Nooksack river. Discussion of the use, quantification, and timing of diversions from the middle fork into Lake Whatcom should be included in the plan.
3. Informing and encouraging “watershed residents and visitors about alternative transportation opportunities” will continue to be ineffective without actual viable alternative opportunities. The plan should include the actual plans to deliver more and separated bike/walking lanes, and functional bus / shuttle service to recreational facilities such as the Hertz Trailhead. Continuing to only encourage alternate transportation opportunities (when they are so limited), while building more and larger parking lots for cars, undermines credibility.

Program Area 9 – Education and Engagement

1. This plan is very heavy on educational efforts compared to regulatory enforcement, yet nowhere in the document is there a discussion of why that is, and how you know whether education is providing the necessary changes compared to what regulatory enforcement could. In fact enforcement is only mentioned briefly in the draft plan, and only related to the AIS and septic inspection program. How is enforcement used for land use regulations, forest practices, stormwater, recreation, hazardous material use? We think this section should be expanded to include the 3 E’s – Education, Engagement, and Enforcement, with a discussion of regulatory enforcement in the watershed, and how decisions are made between increased education and engagement versus focusing on enforcement, versus a combination of the three.
2. While this section is referred to as Education and Engagement few details are provided about the specific programs. Links or references to these details should be provided, and enough information made available so it is clear which activities are one-way educational communications meant to inform the public about important issues, versus two-way communication efforts meant to engage the public in greater behavior change.

Program Area 10 – Administration

1. Good management is necessary for the successful implementation of any plan, so management should be described in the plan. Particularly important for a long-term plan such as this one would be the inclusion of how management commits to and monitors continuous improvement. Nowhere in the document is there any discussion of the management of this plan, which would include things such as:
 - How are decisions made and at what levels?
 - Who is responsible for various management areas?
 - How is the plan reviewed and approved?
 - How is cost versus benefit assessed in decision making?
 - Does a philosophy of continuous improvement and adaptive management exist and drive efforts, and how is that assessed?
 - How is staffing and funding adequacy assessed?
 - Who pays for what?
 - Etc.

Please add a discussion of these types of important management considerations and links to where the specifics can be found. It appears this Administration program area should be expanded to Administration and Management to include this type of information.

Program Area 10 – Climate Action

1. There are very few specifics about how considering climate change will change management of the lake. Is this because you are awaiting the findings of the Lake Whatcom Climate Vulnerability Assessment? If so, that should be stated, the timeline for completion should be added, and a commitment should be made to amend and update the plan ASAP to include those details once that vulnerability assessment is completed.
2. A more thorough treatise on climate change needs to be made. The full spectrum of climate change threats or impacts on the watershed should be identified. Little if any treatise is given in the plan on the cumulative impact of past, present, and reasonably foreseeable future climate change impacts relative to water quantity and quality. Climate change is likely the largest threat to water quantity and quality in the watershed, yet it receives the second lowest funding level during the term of this work plan.
3. Per the above comments, the impacts of climate change on streamflow quantities must be more directly addressed by the plan. This is particularly important regarding the cumulative impacts of climate change and forestry in the watershed.

Program Area 10 – Forest Management

1. There are very few specifics about how forest management will change around the lake with the inclusion of this new program area. Is this because you are awaiting the findings of the pending Forest Management Plan? If so, that should be stated, the timeline for completion should be added, and a commitment should be made to amend and update the plan ASAP to include those details once that vulnerability assessment is completed.
2. There is minimal reference to the impacts of forest harvest in the watershed on water quality and streamflow. The work plan should explain what analysis has been done related to forest harvest impacts on water quality and quantity, what more needs to be done, and plans to address impacts as identified. Also, the plan needs to make clear the impacts of commercial forestry on water quantity which also affects water quality.
3. The work plan should address the issue of the regulated short term, six-year development moratorium on developable parcels that are clear cut. Several of the goal and objective statements in the plan reference the role that forest cover plays on watershed health and function, and promote protecting forest cover

and preserving watershed function. However, the plan should consider the benefits of promoting the regrowth of forest cover well beyond the current term of the six-year development moratorium. Further, promoting a longer duration beyond the current six-year development moratorium gives more time for the clearcut area to recover watershed function.

4. The Forest Management Program should consider a further development of a credit incentive program that provides incentive for landowners to retain forest cover in the development of parcels in the watershed rather than clearcut. Retention of mature trees in a development is consistent with the goals of the [state's Low Impact Development \(LID\) program](#) and promotes watershed function and health, which directly relate to water quality and quantity. LID is not even mentioned in the plan.
5. Add two new sections to 11.2
 - 11.2.8 De-incentivize clearcutting on developable parcels. Extend the term of the development moratorium beyond the current six years to a duration consistent with ecological hydrologic maturity.
 - 11.2.9 Promote forest management that relies on ecological and ecosystem health as outputs from forest management actions. Promote avoidance of short-duration even-aged harvests on forest resource lands.
6. There is no mention of how recommendations from the newly formed Whatcom County Forest Resilience Task Force will be considered or added to the plan, even though that is one of the reasons the Task Force was formed. Please add language acknowledging the task Force, and how the forest plan they are tasked with drafting over the next year will be incorporated.

Additional Specific Proposed Edits:

Page 4, paragraph 1, last sentence; insert “protect streamflows,” after water quality.

Page 5, paragraph 1, second line; deterioration in the watershed started well before the 1980's. Re-write sentence so it is obvious deterioration did start well before the 1980's when planning to address the deterioration started.

Page 6, second to last bullet; the formal name is Middle Fork Nooksack River, not Middle Fork of the Nooksack River.

Page 7, first bullet; insert “and Best Management Practices” between principles and for.

Page 8, third paragraph; insert “and forest resource lands” after developed areas and entering.

Page 10, last paragraph, last line; insert “,streamflow quantities” between quality and.

Page 11, second paragraph, third line; insert “including management of forest resource lands” after activities.

Page 17; there is a need to also address forest resource lands, not just developed areas.

Page 19, item 11; after increased temperatures insert “reduced streamflows.”

Page 19, item 12; after water quality insert “and quantity.”

Page 20, In 1.2 Property management, first line; insert “and quantity” after water quality.

Page 22, first paragraph; Insert “Avoid clearcut of parcels that qualify for subdivision” at end of Section 2.2.3.

Page 23, Section 2.4.2; insert “and quantity: after water quality.”

Page 24, first line; insert “and quantity” after quality.

Page 24, second paragraph; This should also address water quantity.

Page 24, Reporting Metrics; “forest” should be defined based on area, how old, what size class, etc. Generic forest is too broad in a metrics.

Page 26, first paragraph; insert “water quantity” after water quality.

Page 26, second paragraph; insert “water quantity” after water quality.

Page 26, section 4.1. Water quantity should also be a part of baseline monitoring; insert “water quantity” after water quality.

Page 26, paragraph under 4.2 Tributary Monitoring; streamflow quantity should be part of baseline monitoring as well as data on water quality parameters.

Page 27, 4.5.1 Baseline Data; insert “water quantity” after water quality.

Page 32, second paragraph, third line; after Lake Whatcom, insert “and minimizing existing invasion of other aquatic invasive species.”

Page 38, Climate Action; at end of 11.1.2; add “that address climate ready watershed management.”

Page 38, Forest Management, 12.4.1; after mitigation insert “and promote climate resilience”.

Page 39, Section 9.3.1; Consider changing this to “Animal Waste: Programs that support animal waste pick up at home and in parks.” There are other domestic animals that provide a source of fecal load in the watershed, such as horses, cats, chickens, etc., so they should be considered also.

Page 40, Objective; insert “promote adaptive management of plan implementation,”. Interesting that this work plan never mentions adaptive management, which is an important parameter of plan development and implementation.

Page 41, 10.3 Work Plans and Reports; this section should reference adaptive management and explain how it is used as part of the management of all components of the plan.

Page 43, first paragraph, third line; make the following changes after temperatures, “altered streamflows (higher flows in winter, lower flows in summer and fall), other water quality impairments, and changing rainfall patterns.” Also note that variation in rainfall is an existing attribute of weather and climate; however, climate change includes changes in rainfall patterns not variations, unless you mean increased variability, then say that.

Page 45, first paragraph; insert “and quantity” after quality.

Page 45, 12.1; add in new section “12.1.3 Work with private forest landowners and DNR to extend the rotation age of even-aged harvests to a duration that promotes and protects streamflow quantities and quality, carbon sequestration, as well as ecosystem health.”