

# Whatcom Environmental Council

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May 16, 2024

TO: Bellingham City Council  
Kim Lund, Mayor  
RE: Silver Beach Neighborhood Rezone

The Whatcom Environmental Council has recently been formed to advocate for a healthy environment. Nothing could be more important than a healthy Lake Whatcom, the drinking water source for over 100,000 people.

We congratulate the Bellingham City Council on rethinking high density residential development in the Lake Whatcom watershed. We understand that housing affordability is a critical issue in the City and that increasing residential densities in many areas of the City will be an important tool to help achieve affordability. The Lake Whatcom watershed is not, however, an area that is appropriate for dense development, as evidenced by the City's Lake Whatcom Land Acquisition and Preservation Program, a fee-funded program aimed specifically at reducing development and its impacts on water quality. When the City is spending millions of dollars to purchase development rights to address water quality, we don't believe allowing over 300 more homes in the watershed is good public policy.

We recommend the City adopt a Residential, Low Density designation for all areas within the Lake Whatcom Watershed.

Adopting a Residential, Low Density land use designation is supported by the Comprehensive Plan. Policy LU-3<sup>1</sup> says the Residential, Low Density designation "should be used for land that is not suited for more intense urban development because of environmentally-sensitive areas..." Lake Whatcom is an environmentally-sensitive area and is not suited for more intense urban development.

One argument that was made before the Planning Commission is that additional development would generate stormwater improvements that are needed where they don't currently exist. However, Policy EV-1 says to "Focus on ***protection over treatment*** in managing Lake Whatcom and its watershed" (emphasis added) Reflecting the 1992 Joint Resolution of the City of Bellingham, Whatcom County, and the

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<sup>1</sup> The staff report to the Planning Commission incorrectly identified this as Policy LU-17. See page 5 of the Land Use Chapter at <https://cob.org/wp-content/uploads/2016-land-use.pdf>.

Lake Whatcom Water and Sewer District, the City's Lake Whatcom Management Program 2020-2024 Work Plan reiterates that the partners should "prioritize protection over treatment in managing Lake Whatcom and its watersheds."

We know that the Bellingham City Council is aware that stormwater treatment isn't the only thing that impacts water quality. For example, the City's Lake Whatcom Management Program 2020-2024 Work Plan specifically acknowledges the significance of pollution from vehicles and provides for funding to reduce pollution from transportation sources. Adding over 300 homes (600 people), together with dogs, vehicles, and other pollutants that will enter the lake despite improvements to stormwater treatment, will undoubtedly contribute negative water quality impacts to Lake Whatcom.

Other solutions to address current stormwater impacts (e.g. public/private partnership) should be pursued that don't require adding over 300 homes which will not protect Lake Whatcom and its watershed.

Additional goals and policies of the Comprehensive Plan to support a Residential, Low-Density designation include:

- Goal LU-7 says to "Protect and restore our community's natural resources (land, water and air) through proactive environmental stewardship"
- Goal LU-8 says to "Protect and improve Lake Whatcom and its watershed to ensure a long-term, sustainable supply of water."
- Goal EV-1 and EV-2 say to "Protect and improve drinking water sources" and "Limit development in the Lake Whatcom watershed"

We would like to commend the City for recommending amendments to the Lake Whatcom Reservoir Regulatory Provisions to establish specific rules for development of new units and redevelopment of existing multifamily units in the watershed.

Thank you for consideration of our comments.

Regards,  
Whatcom Environmental Council