

Whatcom Environmental Council

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March 10, 2025

TO: Whatcom County Council
Whatcom County Executive
RE: Nonbinding Resolution (AB2025-224)

The Whatcom Environmental Council urges the County Council to reject the proposed multi-jurisdictional resolution that has been added to the agenda for March 11th (AB2025-224). Adoption of this resolution is not required by the Growth Management Act (GMA), is inconsistent with the public participation and environmental review requirements and fails to even consider how growth projections and allocations affect our response to climate change and resilience, or available water resources.

Population Allocations:

The resolution requests approval of the population and employment allocations proposed by the cities, which appear in some cases to be based on aspirational goals rather than realistic, data-driven estimates. The county-wide growth projections are approximately 19% higher than the Office of Financial Management's medium-growth forecasts, which have historically been an accurate estimate of future growth. This disparity highlights the need for a more rigorous analysis to ensure allocations align with probable growth trends and avoid unnecessary overestimation. Some areas may need projections higher than the medium population numbers, and some areas, particularly the rural areas, should have lower projections, but the overall projected number should be more closely align with the OFM medium number. The numbers proposed for the non-binding resolution make no attempt to accomplish this difficult but critical balancing act.

Higher population allocations risk triggering unnecessary expansions of Urban Growth Areas (UGAs), potentially leading to sprawl and encroachment on farmland and other resource lands. Such impacts could undermine the county's goals of preserving agricultural viability and protecting critical natural areas. Any decision to expand UGAs must be grounded in demonstrated need and informed by comprehensive environmental and public review.

Water Availability:

It appears that the County Council is considering “non-binding” approval of growth projections that exceed the OFM medium number without knowing whether water will be available in areas where new growth will be allocated. Lynden’s mayor, at a city-county elected officials meeting on [October 29, 2024](#), admitted that Lynden has been “out of water...for 20 years”, yet the proposed Resolution would allocate 6,665 more people (4,659 housing units) and 1,799 more jobs to a city that has publicly admitted it is out of water.

Water availability concerns are not limited to Lynden, however. While the City of Bellingham may have additional water rights to serve a larger growth allocation, no evidence addresses whether increased urban water consumption will impair water resources in the Nooksack watershed. [We have asked the City of Bellingham](#) how their proposed growth strategy affects water for fish and wildlife, and the absence of a response indicates that the City probably does not know. [We understand](#) that “the city of Bellingham is in discussions with the Lummi Nation over water use” and that “the city and tribe differ over which studies should be used in negotiations. Bellingham is launching its own \$500,000 study, with field work to be completed by the end of the summer.” There is no reason to approve a population allocation to Bellingham before this study is completed, even if the allocation is said to be “non-binding.”

Climate impacts:

The resolution asks the County Council to approve population allocations before the Council has reviewed or considered any analysis of climate change and resilience. In 2022, the County Council spent several meetings ([AB2022-422](#)) establishing priorities for the GMA Update, culminating in [Resolution 2022-036](#). At that time, the Council directed to “[m]ore thoroughly consider how growth patterns may have been altered from ...climate change...and what impact this should have on future planning.” Despite our repeated requests to delay growth allocations until the Environmental Impact Statement might show where growth is best allocated to address climate change, the proposed proposed Resolution would be adopted before the Council has considered any climate change information.

Failure to address other GMA issues:

It is essential to consider other critical issues before approving growth projections and population allocations. The County needs to consider how to direct growth out of rural areas to urban areas, how it intends to ensure 100,000 acres of agricultural land is designated, and how it intends to address the GMA requirement for open space corridors within and between Urban Growth Areas. We have provided recommendations regarding these issues in our letters, linked below.

Public Participation Concerns:

Finally, we are alarmed that you added this resolution to the agenda on Friday, March 7th and may take action only two business days later, on March 11th, without any additional public notice, public hearing or environmental review. The legislative record before the County Council is devoid of any input except letters from cities. Letters written by WEC and other citizens are not included in the packet or posted online. The record also fails to include the proceeding of the County Planning Commission in 2024 (see Planning Commission materials at [AB2025-081](#). to the Council should not proceed without providing an

adequate opportunity for public participation, especially when public input to date is excluded from the record.

Thank you for consideration of our comments. To ensure that our previous comments are in the record in the event you decide to move forward with this resolution, the following are links to letters that WEC previously provided to Whatcom County.

- 1) January 27, 2025. [Allocating Population](#).
- 2) December 8, 2024. [Population and EIS](#).
- 3) December 1, 2024. [Bellingham Growth Strategy](#).
- 4) November 12, 2024. [Growth Projections](#).
- 5) October 21, 2024. [Proposed Growth Strategy](#).
- 6) August 23, 2024. Open Space Corridors – [Bellingham & Ferndale](#), [Cherry Point & Birch Bay](#), [Blaine & Birch Bay](#).
- 7) July 30, 2024. [Urban Growth Areas, Growth Projections](#).

Regards,

Carl Weimer, President