



# WHATCOM COUNTY

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## WASHINGTON

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### Memorandum

TO: The Whatcom County Council  
FROM: Lucas Clark, Planner II  
THROUGH: Mark Personius, Director  
DATE: December 30th, 2025  
SUBJECT: Rural Residential Island (RRI) aka Lummi Island

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The Rural Residential Island (RRI) District is specific to Lummi Island. It applies only to the north half of Lummi, which is generally rural. Some commercial uses are permitted through a conditional use permit under Whatcom County Code WCC 20.34.150. Lummi Island is a unique district with geographic barriers to food affordability and accessibility. This code change will allow food preparation for off-site consumption when accessory to and located within an approved community center as a conditional use.

[The Gathering Place](#) is a modern, fully accessible community center on Lummi Island, at 3913 Legoe Bay Rd. The venue includes a main hall with a capacity of 191, a commercial kitchen, two restrooms, an outdoor patio, and access to the beach. Completed in 2023, the venue has been widely used by Lummi Islanders.

Rebecca Rettmer of The Gathering Place has requested a code update to add off-site food prep as a conditional use. The kitchen at the Gathering Place is currently utilized for on-site events and for preparing Meals on Wheels. For outside food service retailers, such as local food trucks or The Galley (a local restaurant), to use the space for food preparation, a code update is needed. The code update would allow The Gathering Place to expand the use of its existing kitchen for off-premises retail food sales outside of the community center.

One of the main challenges in siting prep kitchens (a common term for off-site commercial kitchens used exclusively for food prep) is the lack of a public sewer system on Lummi. Typically, all users have septic systems. Generally speaking, restaurant uses are hard on septic systems. This has created challenges when siting restaurants and commercial kitchens in the RRI. The Gathering Place has a new modern septic system that can support (due to the soils) the commercial kitchen and uses described previously.