

To:

Satpal Sidhu <[SSidhu@co.whatcom.wa.us](mailto:SSidhu@co.whatcom.wa.us)>

Whatcom County Council <[council@co.whatcom.wa.us](mailto:council@co.whatcom.wa.us)>

## WHATCOM COUNTY



Ryan Corley, Chair  
Bicycle/Pedestrian Advisory Committee  
April 9, 2025  
Whatcom County Executive  
311 Grand Ave, Suite 108  
Bellingham, WA 98225

### **Subject: Comprehensive Plan Update - Transportation Element**

Dear Executive Sidhu, County Councilmembers,

We are writing to express grave concerns regarding the Proposed Active Transportation Network and Multimodal Levels of Service developed by the consultant Transpo Group. This new Active Transportation Network and Multimodal Levels of Service are required by House Bill 1181 that was adopted by the Washington State Legislature in 2023 and memorialized in RCW 36.70A.070. At the March 12, 2025 Bicycle/Pedestrian Advisory Committee meeting, the consultant Transpo Group presented their current draft work products to comply with this RCW.

We are disappointed in the way the active transportation network recommendations are coming together. They are not in alignment with initial direction presented by the consultant at a previous BPAC meeting, are not in alignment with direction provided to the consultant by BPAC members, are not in alignment with other County plans including the Climate Action Plan, Comprehensive Parks, Recreation, and Open Space Plan, and the 2011 Pedestrian & Bicycle Plan, and do not comply with the above mentioned GMA requirements. Furthermore, the current proposed materials are glaringly silent in their consideration of existing Comp Plan Policies 6F-3, 6F-4, and 6F-5, and do not align with the intent of Policies 6F-1 and 6F-2.

Our concerns are:

- **Multimodal paths such as the Bay to Baker Trail and Nooksack Loop Trail have been removed from the plan.** These trails have been in Whatcom County's plans for decades. No advisory groups have recommended their removal. On the contrary, Whatcom County Parks & Recreation has applied for grants and is hiring a staff person to move these connections forward. If Public Works were amenable to collaboration, Whatcom County could have safe active transportation corridors between many communities. Multimodal paths can be designed and built to comply with active transportation standards, and road funds can be used to plan, acquire rights of way if necessary, and build them. *The current proposed Active Transportation Network ignores those facts and actively excludes them from the planning process.*

- **Undeveloped rights of way that are publicly owned and could be developed for active transportation connections have been ignored.**
- **The consultant has labeled on-road segments “complete” that are high stress, high speed roads without any protection from moving cars.** For example, the proposed bicycle connection between Lynden and Birch Bay is on the high-speed, high-volume Birch Bay Lynden Road. This is considered “complete,” despite the fact that people on bicycles would be required to ride on an unprotected 5-foot shoulder of a 50 mph road, where drivers routinely exceed that speed. I would not feel safe riding along this road. I don’t know many people who would. Several other “complete” connections are shown on the consultant’s map that are similarly dangerous, including Hannegan and Smith Road.
- **Other on-road segments that are identified for improvement would not be improved adequately for the average person to feel comfortable on a bicycle.** A five-foot shoulder with a painted white line is all that is recommended for other similar high-speed, high-volume roadways such as Slater Road, Everson Goshen Road and the Mount Baker Highway.

In short, this plan prioritizes single occupancy vehicle travel throughout Whatcom County. We can do so much better. Approved County plans such as the Climate Action Plan, the Comprehensive Parks, Recreation, and Open Space Plan, the Pedestrian & Bicycle Plan, in addition to individual city plans from Bellingham, Ferndale, Lynden, and Everson (plus the smaller cities) all identify future bicycle and pedestrian infrastructure, both on- and off-road. We should be drawing from these plans to define safe active transportation connections between communities that people *want to use*.

We ask that you direct the consultant to:

- **Plan low-stress active transportation corridors between the population centers, small cities and urban centers of Whatcom County.** WSDOT has a Growth Management Act (GMA) Comprehensive Plan resources [list](#) for updating local government comprehensive plans. The first document in this list is [WSDOT Multimodal Level of Service Guidance](#). In this document, *it is recommended that active transportation facilities meet a Bicycle Level of Traffic Stress threshold of 2 or lower*. The consultant’s current plan nearly exclusively consists of facilities that are BLTS 3 and 4.
- **Retain and prioritize the Bay to Baker, Nooksack Loop and Coast Millennium Trail corridors**, with the recommendation that they meet active transportation criteria where there is not a low-stress (BLTS 1 or 2) on-road alternative. This must include consideration of County rights of way and identify/prioritize connections with trail plans and corridors developed by the cities and other municipalities in the County.
- **When mapping the above-mentioned trail corridors, identify and include for consideration:**
  - Rights of way that are currently undeveloped
  - Parcels owned by the Whatcom Parks and Recreation Foundation that have been offered to Whatcom County at no cost for years
  - County owned parcels
  - County held easements
  - City owned parcels and easements
  - Other publicly owned parcels

These parcels, rights of ways, and easements must be considered and prioritized in an Active Transportation Network.

- **Direct a minimum of 5% of TIP (Transportation Improvement Program) funds annually to improve Whatcom County’s active transportation network.** The current spending on active transportation projects is not significant enough to make any headway whatsoever in accommodating people who want or need to travel by bicycle to their jobs, schools, shopping and

other destinations. Furthermore, projects such as the Marine Drive multimodal improvements should prioritize less expensive, paved multi-use side paths instead of opting for highly expensive road widening. Adding sidewalks, curbs, gutters and bike lanes to Marine Drive has cost taxpayers much more than adding a paved sidepath would have. Additionally, a paved sidepath would offer a significantly lower level of traffic stress for people walking and cycling.

- **Incorporate and prioritize active transportation and multimodal improvements around schools to comply with Comp Plan Policy 6F-2.**

Multimodal trails and paths can easily comply with current active transportation standards and create active transportation infrastructure that the community will actually use and feel safe while doing so.

Multimodal trails and paths can easily be funded by TIP dollars, if you direct it, but Council, the Executive, and staff must prioritize this effort.

**Trails are transportation.** People who walk and bike deserve a safe, comfortable network on which to travel throughout Whatcom County. We urge you to make this safe network a reality and stop prioritizing single occupancy vehicle travel for the sake of our safety, health, economy and climate. With the rise in popularity and affordability of e-bikes, this is a realistic and necessary step forward. The first step is drafting a solid plan. The current proposed Active Transportation Network and associated multimodal levels of service are unacceptable and do not suffice.

**Sincerely,**

Ryan Corley

Chair, Whatcom County Bicycle and Pedestrian Advisory Committee

Whatcom County Bicycle and Pedestrian Advisory Committee

Patrick Alesse, Kelly Kendall, John Upston, Dan Kostozewski, Charlie Heggem, Patrick Bush, Gervasio Tirigall, Payden Waldo

[Whatcom County 2016 Comprehensive Plan Chapter 6 Transportation \(see Goal 6F and associated policies\)](#)

[RCW 36.70A.070 Comprehensive plans - Mandatory elements \(see section 6\)](#)

[Whatcom County Climate Action Plan](#) (see page 153, priority action #5)

[Whatcom County Pedestrian and Bicycle Plan](#)

[Comprehensive Parks, Recreation & Open Space Plan](#)