

WHATCOM COUNTY**Parks & Recreation**

3373 Mount Baker Highway
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Bennett Knox, Director

Christ Thomsen, Operations Manager

Date: August 21, 2025

To: Mark Personius, Director, PDS

From: Bennett Knox, Director, Parks 

Subject: Comprehensive Plan Update – Chapter 9 (Parks & Recreation)

Whatcom County Parks and Recreation appreciates the opportunity to provide comments following the Whatcom County Planning Commission's review on July 10, 2025 of Chapter 9 (Parks & Recreation) as part of the current Comprehensive Plan update. Planning Commission comments centered around edits to the representation of regional trails as depicted on Map 9-2.

Based upon Planning Commission comments, as well as those from the public received as part of Planning Commission review, PDS had provided WCPR with a draft map revision on August 7, 2025. We make the following comments to the draft in order to finalize this map as part of the packages for Council Review.

- 1) As pertains to the comments that Map 9-2 should be updated to show constructed segments of trail:

In response to this comment, WCPR contacted various jurisdictions across which the path is conceptually identified to pass. The following comments reflect the responses received from those jurisdictions. We also respond to public comment received related to respective trails as noted below.

- **Coast Millennium Trail (CMT)** – Based upon contact with the City of Bellingham Parks Department (COB Parks) WCPR has provided a shapefile to PDS that identifies constructed segments of trail that COB Parks considers part of the CMT. In addition, the shapefile provided updates to other segments that have been completed and not previously shown as such (i.e., WCPR segments of the Interurban Trail, the Birch Bay berm, and segments within the City of Blaine (Semiahmoo)).
- **Bellingham to Baker Trail** – During the planning commission meeting a member of the public provided a map with alignments for the trail that identified certain segments as being “constructed” across various public jurisdictions. To verify, WCPR contacted public agencies including the COB Parks, the Washington State Department of Natural Resources (DNR), and the US Forest Service (USFS) to inquire as to whether or not those agencies recognize sections of the Bellingham to Baker Trail as being sanctioned. In addition to the COB Parks, who provided a GIS shapefile, only the DNR has responded. In an email dated August 14, 2025 the Acting Baker District Recreation Manager wrote:

“...The trail map submitted does align with the DNR's B2B plan in some areas but also differs in substantial ways that conflict with the plan and

commitments the DNR made to stakeholders and Tribal Governments during the planning process. In particular, the DNR still intends not to pursue any recreation development in the Middle Fork valley including trails that would connect the S. Fork and N. Fork valleys across DNR land. You are correct in your assessment that the DNR has not designated any existing forest road segments or trails as portions of the "Mt. Baker Trail" nor has there been commitment or approval to pursue the trail as proposed. At this time, we ask that the "Mt. Baker Trail" [sic] be shown only as proposed on DNR lands. While there appears to be potential opportunity for a future "Mt. Baker Trail" [sic] to align with the DNR's trail connectivity vision at the Mirror Lake Unit and Olsen Creek State Forest, it has yet to be confirmed which landscape will be the next area of focus for trail development after Olsen Creek is completed."

As of today, Parks has not received input from the USFS on the routing of the Bellingham to Baker Trail that are within the USFS-managed lands.

Consequently, WCPR suggests no changes to this map from the 2016 version as it relates to the Bellingham to Baker Trail other than to incorporate 1) sections within the City of Bellingham that COB Parks has identified as complete and 2) sections of the trail within Lake Whatcom Park that WCPR has similarly so identified.

- Bay to Baker Trail – COB Parks has identified completed trails within the City of Bellingham considered to be part of the Bay to Baker Trail and we recommend that these segments be shown as such on Map 9-2.
- 2) As pertains to the public comment that Map 9-2 should show a proposed Lake Whatcom Loop Trail:
- Parks does not endorse depicting a conceptual "Lake Whatcom Loop" on Map 9-2 at this time. Although there may be merit, we are simply too early in the planning process to identify any conceptual routing for the trail at this time. The reasons are as follows, 1) there has been almost no public engagement regarding this trail aside from it being lobbied for by a minority of trail enthusiasts. This would in fact be contradictory to the special visioning note on the map explaining the origins of the various conceptual trail alignments. 2) there has been no outreach to critical property holdings that are outside of the control of Whatcom County. 3) There is limited departmental capacity to initiate and sustain the various trail initiatives shown on the map. Parks urges maintaining the current inventory of conceptual trails.
- 3) As it pertains to the Planning Commission comment regarding symbolic representation of the alternate routing of the CMT that resulted from comments by BP:
- Parks respectfully disagrees with the Planning Commission recommendation to use a special linewidth of the various "proposed trail corridors" in certain areas. We believe this may cause confusion to the reader. Rather, Parks recommends maintaining the current linewidth that is solid where the trail is existing and sanctioned by the land managing agency, and dashed where it is not.

Thank you for the opportunity to comment. Should PDS have any additional questions, please feel free to reach out to my office.