

# Whatcom Environmental Council

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August 23, 2024

TO: Whatcom County  
City of Bellingham  
City of Ferndale  
RE: Open Space Corridors between and within Bellingham and Ferndale

On July 30<sup>th</sup>, we sent Whatcom County and each of the cities a letter addressing the engagement and involvement we plan with respect to your upcoming Comprehensive Plan updates required by the Growth Management Act (GMA). In that letter, we reminded each jurisdiction that the GMA requires open space corridors within and between UGAs useful for recreation, wildlife habitat, trails and connection of critical areas. ([RCW 36.70A.160](#))

We request that you direct staff to present to you options for an open space corridor between Bellingham and Ferndale that is useful for wildlife habitat and connection of critical areas. The corridor that we have drafted (attached) to separate the two urban growth areas includes significant holdings by local, state and tribal governments, with very little opportunities for urban growth.

Additional open space corridors for fish and wildlife habitat have been identified that connect to Silver Creek. Some of these open space corridors are included in city and county recreation plans for trail and bike routes. Review of those plans should take place with your comprehensive plan update process.

Our preliminary recommendation for open space corridors is based on review of the following sources of information:

- [Priority Habitats and Species](#) (PHS) – the PHS Program is the primary means for transferring fish and wildlife information from resource experts to local governments. The attached maps include PHS locations mapped within Whatcom County, and specifically, in and around the Bellingham and Ferndale Urban Growth Areas.
- [Bellingham Habitat Restoration Technical Assessment](#) (2015) – “...the analysis indicates that the best place to apply floodplain reconnection actions is in the Silver Creek Tributary #2 sub-watershed.” “Overall, the wetlands appear to be highly functioning and therefore wetland protection ranks as high for the Bear Creek

sub-watershed.” “Based on the results of the prioritization and interviews with local experts, the recommended focus is on forest and wetland protective actions, combined with wetland restorative actions....The proposed approach has the potential to help maintain water quality and flow functions in Bear Creek and its tributaries, as well as provide valuable and varied wildlife habitat. This approach also has the potential to maintain a relatively intact forested corridor located between the city center and agricultural lands to the north, in an area that is currently showing development pressure.”

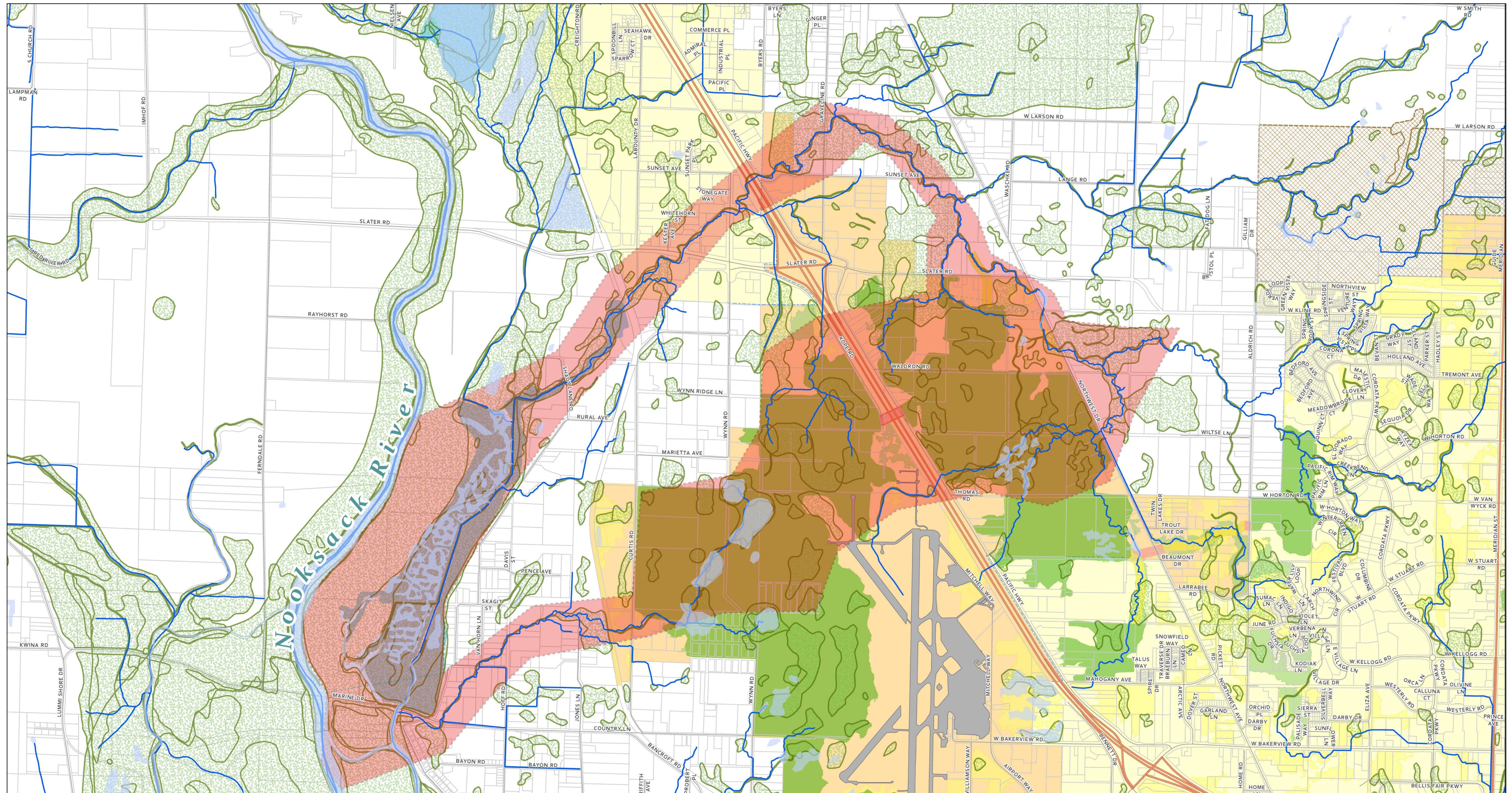
- [Bellingham Habitat Assessment](#) (2003) – “...excellent habitat for all wildlife....Very large, high-quality, forested wetlands and small ponds are found throughout this block with the largest on the western side. The wetlands are an essential part of the Silver Creek regeneration system. The tributary connects with Silver Creek proper near its junction with the Nooksack River....Wildlife would benefit from a connection across I-5 along this block.”
- [Wildlife Corridor Analysis Report](#) (2021) – see Figure 8, Terrestrial Wildlife Habitat Network and attached map
- [Draft Urban Forest Management Plan](#) (2024) – “Goal 2. Protect and restore priority habitat areas, movement corridors, and forests”
- [Bellingham Comprehensive Plan, Land Use Chapter](#) – “Maintain an open space corridor between the Ferndale and Bellingham UGAs. This corridor should include lands useful for recreation, wildlife habitat, trails, and/or connection of critical areas (See Parks, Recreation and Open Space Plan for Open Space Map)” Policy LU-59
- [Bellingham Comprehensive Plan, Parks, Recreation and Open Space Chapter](#) – see “Recommended Facilities Plan – Open Space”

We believe the attached map of open space corridors would create a system of fish and wildlife habitat with connections between larger habitat blocks and open spaces. These corridors provide important linkages in a highly fragmented landscape. Please direct your staff to present an option for designating these open space corridors, including changes in land use designations to implement the change.

Regards,

David Stalheim  
Whatcom Environmental Council

C: Lummi Nation



#### Legend

- Open Space Corridors - Proposed Study Area
- Priority Habitat and Species (Mapped)
- Cities, UGA & UGAR
- Cherry Point UGA
- Urban Growth Area (UGA)
- Urban Growth Area Reserve (UGAR)
- Elgrass Inventory
- City Limits

- TWHN Multi Species Overlap Areas
- Important Wildlife Habitat Area
- Important Wildlife Corridor
- Significant Movement Barrier
- Movement Barrier
- Other Habitat Patch

## Bellingham-Ferndale Urban Growth Area Open Space Corridor (Wildlife & Habitat)



0 0.25 0.5 1 1.5  
Miles