



November 29, 2024

Dear Bellingham Plan team,

Thank you for this opportunity to send detailed feedback about the Bellingham Plan results to date. We applaud the extensive process you have held for community engagement. We also appreciate that you indicate preliminary directions for each BP chapter in the slide decks -- *before* writing the draft report in 2025. Although we would have loved to have a separate stakeholder session with you to discuss issues in depth, this letter aims to offset that missed opportunity.

WMTP's comments below are based on what we see in the slide decks. Obviously, further refinement and development will occur in the concepts and objectives. Our comments below are not criticism in any way, but simply our attempt to infuse our concerns and perspectives "into the mix" as you create a draft BP document in 2025.

Note that Whatcom Million Trees Project is 100% for...

- middle housing in all shapes and forms,
- affordable higher-density housing,
- well-planned multi-mode transportation corridors,
- well-planned mid- to high-density urban villages,
- a widely distributed mix of small people-oriented public spaces,
- innovative urban design that encourages pedestrian activity,
- flexibility/incentives for developers who plan well, and
- elimination of parking minimums.

General Comments

1. Clearly state that balance is achievable when considering urban tree canopy needs and housing demand.

We all want increased affordable housing opportunity throughout our City, a more equitable response to the City's inevitable growth. While it's very easy to frame trees versus housing as competing needs, that's a false dichotomy. The reality is in most projects, both needs can be met and integrated together although both require site space. Developer profits may decrease a bit (although municipal savings will increase¹), and more careful site planning and review will be necessary by all, but it is an achievable balance that many cities regionally and worldwide are striving for. We urge you to explicitly **embrace this achievability** to counter the false narrative.

2. Explicitly acknowledge and plan for local climate threats -- saving lives and money.

A new climate era is unfolding before our eyes, bringing increased urban heat extremes to Bellingham that will continue to hospitalize/kill residents. (At least 600 residents in the Pacific Northwest died in 2021's heat wave; some estimates place that death toll at ten times higher.) Our new climate era also brings increased torrential flooding within Bellingham (not just along the Nooksack) that overwhelms stormwater systems and temporarily displaces residents and businesses in costly ways.

Trees and related green infrastructure are **cost-effective natural allies** to buffer and reduce the above climate threats. They are as essential to Bellingham's future livability as many traditional urban planning factors. We urge you to proactively and explicitly integrate these allies into more objectives/goals of the Bellingham Plan than a few relatively siloed sections within the Climate and Environment chapters. (See our comments below per chapter.) This will help the City to avoid the costly challenge many other municipalities now urgently face of trying to retrofit green areas into their urban environments.

3. Develop S.M.A.R.T. objectives.

S.M.A.R.T. -- specific, measurable, achievable, relevant, and time bound -- is a well-established approach for setting and reaching goals. Although the Bellingham Plan is a broad strategy outlining a long-term vision for our community, S.M.A.R.T objectives provide a structured way to implement goals within a comprehensive plan. This is also advocated by the Municipal Research and Services Center (MRSC) to cities about comprehensive plans.

S.M.A.R.T. Objectives are...

Specific: Clearly defines what needs to be accomplished, leaving no room for ambiguity.

Measurable: Provides metrics to track progress and determine if the goal is being met.

Achievable: Set at a realistic level considering available resources and capabilities.

Relevant: Align with overall goals of the comprehensive plan.

Time-bound: Distinguish nearer term objectives can be distinguished from 10-20 year objectives

If you cannot achieve the above when drafting the Bellingham Plan, it's a sign that your objectives are probably too broad or vague. A few tree-related examples of this problem (in the slides) are,

- " Foster climate resiliency, readying our community for a changing climate and more frequent climate events."
- "Integrate and elevate natural features and open spaces into design."
- " Activation of public spaces to make them more vibrant and enjoyable."
- "Human needs in street standards."

4. Include inspiring real-world solutions from other cities worldwide.

There's no need to reinvent the wheel. Cities across the globe, especially in Europe, have proven, inspiring examples of how to solve some of the issues the Bellingham Plan will address. This includes the challenge of integrating substantial tree canopy into developments and infrastructure to improve urban livability and character. Obviously, Bellingham is more car dependent than Europe and culturally different. Nevertheless, many ideas still can be adapted to our community.

Consider cherry-picking from transformative ideas featured in the Facebook page of the IMM Design Lab, for example. We believe everyone in our community will benefit from seeing such tangible before/after ideas. We urge you to feature several inspiring real-world examples in each Bellingham Plan chapter.

Chapter Specific Comments

Land Use chapter

The community said...

- We are worried about expanding into and removing natural areas if our city boundaries increase.

WMTP supports the following existing objectives in the slides...

- Encouraging public amenities in large private projects. (Do not let the rush for more housing density push away such opportunities.)
- Activation of public spaces to make them more vibrant and enjoyable. (Tree canopy has a big role to play in that.)

WMTP suggested revisions/additions...

a) We notice the Padden north area (~40 forested acres) is under consideration as a UGA. This area should not be developed as it is a key watershed for Lake Padden.

b) Conditions of any annexation should include minimum canopy retention targets -- and -- sufficient funding to achieve those targets, similar to building infrastructure planning and budgeting that is done during the annexation evaluation process to meet City standards.

c) The City should incentivize substantive tree canopy in urban villages not just with street trees, but also by incentivizing pocket parks, mini-forests, gathering spaces, and other small-scale public amenities.

d) Transit/bicycle corridors and nodes should require substantial street tree canopy -- to mitigate increasing urban heat island effects while also making such areas more compelling and people-oriented.

Community Design chapter

The community said...

- We appreciate and want more human-scale streetscapes throughout the community.
- We care about the outdoor and public realm, too. For example, we want ... street trees and defined outdoor spaces.

What COB is proposing...

- Integrate and elevate natural features and open spaces into design. (Natural Features and Open Space)

WMTP supports the following existing objectives in the slides...

- Enhance and define spaces with landscaping and screening
- Connect and link natural features
- Preserve trees and vegetation and control invasives
- Flexibility for design, used and site-specific conditions [i.e. non-conforming buildings].

WMTP suggested revisions/additions...

a) Establish design standards that encourage/reward substantive new tree plantings on-site wherever possible (more than only planting street trees).

b) Reduce the spacing of street trees so that the canopy density and shade provided will increase.

c) If activating/using alleys, consider alleys for all aerial utilities to allow for street trees in the primary right-of-way.

d) The preservation of historic and cultural resources should explicitly include Landmark trees.

e) Streets as Places: Prioritize streetscape design that among other goals (such as pedestrian/bicycle separation) also provides ample tree canopy cover, especially in underinvested/low canopy neighborhoods.

f) Adjust site/building design standards to be flexible enough to improve the odds that building footprints can work around existing mature trees, especially Landmark Trees.

g) In larger infill projects, use design standards to encourage/reward the provision of green, shade-providing public pocket spaces for people to enjoy/connect/gather.

Housing chapter

WMTP suggested revisions/additions...

a) Regarding the Quantity of Housing objective, the potential application of the City's [Infill Toolkit](#) citywide means it's more urgent than ever to fix the Toolkit's tree canopy loopholes. Currently, trees retained that are too close to new construction to survive (intruding more than 20% into a tree's Critical Root Zone/drip line) are counted in the Toolkit's [Green Factor](#) scoring. Also, retained trees that have been rated by an arborist as *poor Likelihood of Survival* beyond 5 years* are also counted in a proposed project's Green Factor scoring. Both are false green elements that are being used as loopholes by some local developers.

*Likelihood of Survival rating by the applicant's certified arborist is based upon the current condition of each tree and extent of proposed construction activity within the CRZ of each tree. Construction activity can include excavation, grading, pavement/concrete placement, soil compaction, utilities, trenching etc. These activities have the potential to sever roots, reduce soil water/nutrient uptake, or reduce subsoil gas exchange due to soil compaction. These effects can compromise a tree biologically and/or mechanically by lessening physical anchorage to the soil.

Compounding the loophole problem, the arborist tree survey required for a development application is typically not spot checked in the field by City staff at least regarding the site's largest trees. Then the proposed project's Green Factor score (which may be largely based on that arborist report and/or have the other false green claims described above) is administratively approved by the Planning Department and is *not* subject to later Hearing Examiner review. This process is not equitable, transparent, or inclusive.

b) Regarding the Safe, Healthy, and Livable Housing objective, we hope the Bellingham Plan draft report will explicitly state that substantial integrated tree canopy (and other green infrastructure) for shade/cooling should be a part of virtually *all* new housing developments -- to mitigate increasingly severe climate impacts locally. (See our General Comments above.) This issue also relates to the mentioned "Researching impact of livability code" elements.

Transportation chapter

The community said...

- We need safe pedestrian and bicycle infrastructure.
- Safety, Comfort, and Reliability: a transportation system that prioritizes safety, comfort, and reliability for all users.

What COB is proposing...

- Human needs in street standards.

WMTP suggested revisions/additions...

a) Explicitly state (and show graphically) that providing shade by planting (or retaining) sizable, dense street tree canopy is essential to successfully accomplish all of the above.

Environment chapter

The community said...

- A "healthy natural environment" is a major strength of Bellingham and we want it to stay that way.
- In 20 years we want to see our city be healthy, clean, green, and sustainable.
- The environment, recreation, and public open spaces are some of our most important community assets.
- We care about trees, nature, and greenery, and these need to be balanced with growth and increased density.

WMTP suggested revisions/additions...

- a)** Regarding the Terrestrial Ecosystems objective to identify and protect open space corridors, consider broadening the definition of such corridors to include urban canopy corridors.
- b)** Regarding the Natural Resource Management objective to balance natural resources with development -- framing housing and trees as competing interests is a false dichotomy. (See our General Comments above.) They can and should be balanced and integrated together.
- c)** Although we strongly support native tree planting, the reality is that native plants may not always be the most appropriate solution for all urban settings, especially with climatic changes that are underway.
- d)** Control of invasives occurs to some degree already in the City's already-identified natural resource corridors, but there is no City program to educate and assist adjacent landowners about such invasives that will bleed into and then degrade such habitat (or into local parks and Greenways). This is a classic example where City partnership with a non-profit like WMTP could help in a very cost-effective way. Yet to date no such interest has been shown by the City.
- e)** Regarding the Human Health and Environment objective, there is no mention of the increasingly urgent role of substantial tree canopy to mitigate extreme urban heat effects and flooding. Many cities are using a [3-30-300 rule](#) to evaluate specific parcels. This urban planning standard (see the link) aims for...
 - each home site has at least 3 trees (preferably mature trees) in view,
 - 30% of the surrounding neighborhood is shaded by tree canopy, and
 - within 300 yards of every home there is a park or publicly-accessible green space.

COB should consider this planning standard, too. It's much more granular than the overall canopy percentages used by the City's Urban Forest Plan and relates to much research about urban heat, livability, and health.

Capital Facilities & Urban Services chapter

WMTP supports the following existing objectives in the slides...

- Public buildings as essential gathering and emergency response spaces (such as cooling shelters)
- Public buildings as models (expanded beyond sustainable design).

WMTP suggested revisions/additions...

- a)** There is an opportunity to highlight public building projects as models for green infrastructure, not just energy sustainability -- to show the public that significant quantities of tree canopy can be retained and integrated into a project with no loss of function.
- b)** During the planning for all public facilities, community solar and parking canopy solar should be explored. Many other cities and agencies are implementing both nationwide. The payback period can be relatively short (12-15 years typically) and the benefits to our community's resilience and equity are significant. Many grants and private-sector co-funding are available to help the City invest in solar.
- c)** For key civic facilities (e.g., community center, public library, city hall, senior center), well-run, widely advertised design competitions can be a wonderful way to lift the caliber of facility design that results *and* increase public participation/engagement with urban design. The Bellingham Plan should explicitly encourage a design competition approach for at least some key civic facilities.
- d)** Green infrastructure planning is to be regularly integrated with traditional infrastructure long-term planning. Explicitly state that mature tree canopy (and newly planted trees, after a few decades) can significantly reduce stormwater/flood peaks and thus save the City millions in 'hard' infrastructure costs.

Climate chapter

The community said...

- We want more places to cool off in the hotter summers.

WMTP suggested revisions/additions...

a) The Bellingham Plan should encourage the next update to the City's Climate Action Plan to not only address reducing *new* emissions but to also address natural solutions to drawing down *existing* greenhouse gases. It also should address climate resilience strategies, such as using mature tree canopy to counter extreme heat effects and urban flooding. This suggestion relates to the new Prepare for Extreme Weather and Justice & Equity Climate Work new concepts of this Chapter.

b) The main point of integrated, substantial tree canopy in all areas of Bellingham is not to improve global carbon capture, which our City alone obviously can barely impact. Instead, the point is to mitigate our increasingly severe *local* climate extremes, such as deadly urban heat effects (especially in inner COB neighborhoods with less tree canopy) and increased urban flooding. Retaining mature trees and planting new trees and other green infrastructure substantively in an integrated, balanced way in new developments is one way COB can cost-effectively do that besides preserving the ecological health of its Greenways and parks. Hundreds of cities (regionally, nationally, and internationally) are now actively enhancing their tree canopy *out of necessity* in our new climate era.

Community Wellbeing chapter

WMTP suggested revisions/additions...

a) Community climate resiliency needs to be a concept/objective in this chapter, as in well-being/survival during increasingly frequent extreme climate events. (See our comments above about climate resiliency.)

b) There's no mention of the proven relationship between tree canopy and community well-being and health. Hundreds of studies verify that substantial mature urban tree canopy is a very cost-effective way to improve the quality of life and well-being of residents and visitors of all ages, and to reduce health problems such as cardiovascular, hypertension and other disorders.

Equitable and Inclusive Civic Practices chapter

The community said...

- Community engagement is important. It is a part of what makes us Bellingham.
- I wish it was easier to understand how everything the City is working on relates.
- The best decisions come from listening to many viewpoints and choosing directions that benefit everyone.
- We like to know what the City is working on and how our ideas might be incorporated.

WMTP suggested revisions/additions...

a) There's a need of significant informational reform to improve transparency and public awareness of new development application posting/notifications. Community feedback to new developments is challenging due to three issues below:

- **Limited notifications.** Notifications of proposed projects are mailed only to landowners within 500 feet from a site plus a neighborhood association representative. Also, a few small yellow signs are posted around the site. For nearby apartments and other rentals, only the landowner receives that mail (and that person or entity may not even be local).

- **Unfriendly development-oriented webpages.** COB's [Development Dashboard](#) and [Current Planning Notices](#) webpages are difficult to use. For example, there is no way to search either for projects within a set time frame, or to see recent new additions. Simple improvements would make a world of difference to the accessibility and usefulness of these online resources.
- **Too-late publicity.** If a proposed project is covered in the press or otherwise becomes more known, often it's after the pre-application stage and thus too late for public feedback to meaningfully alter its design path.

b) See our *Housing chapter* comments above (page 4) about the about current Green Factor loopholes and Hearing Examiner process restrictions that are not equitable, transparent, or inclusive.

Endnotes

1] *"Bellingham's urban forest delivers approximately \$6.3 million equivalent value of services per year for carbon sequestration, air pollutant removal, and runoff mitigation... These dollar values capture just a fraction of the benefits the urban forest provides to the community, many of which cannot be valued easily."* COB draft Urban Forest Plan, 2024 (p.10)