

To: The Whatcom County Planning Commission
5280 Northwest Drive
Bellingham, WA 98226

From:
RE Sources for Sustainable Communities
WaterWork Program

Whatcom County Comprehensive Plan Update Comments, Chapter 8, Resource Lands

July 22, 2015

Planning Commissioners,

Thank you for accepting public comment on the Resource Lands chapter of the comprehensive plan. As you may know, RE Sources is a local organization working to build sustainable communities and protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy and action. WaterWork, a program of RE Sources, is leading our community toward long-term solutions to water conflicts emerging within our growing county.

We have reviewed the current draft of the chapter and have found several areas to strengthen existing policies with direct, simple language and additional policies. We feel the changes will not only better protect our working resource lands, rural lifestyle, and water resources but provide clear direction for managing growth, the local rural economy, and offering surety for the future of agriculture in Whatcom County.

We have prepared these comments because we recognize the intricate and inextricable connection between comprehensive land use planning, and natural resource protection and restoration. We have an opportunity, during this update to the Whatcom County Comprehensive Plan, to direct our future growth in a way that recognizes these interrelated connections as a series of systems dependent on appropriate policies and actions to ensure Whatcom County maintains the qualities which make our community a desirable place to live.

With that in mind we strongly urge your to recommend the following changes (all page references are to the redline version of the Chapter as downloaded from the [County's Comprehensive Plan Update website page](#)). In addition we would like to offer our support to the comments made by the WRIA 1 Environmental Caucus.

Agriculture Lands:

Our review of this section focused on two key issues 1) how to ensure that we have a sustainable farm land base with secure, legal access to water that does not negatively impact instream uses, fish and wildlife populations and habitat and 2) how the County can protect water quantity and quality on agriculture lands. We found the section had the most room for improvement around

the second issue. **In particular the language in section 8E is weak and should be more protective of water quality, fish and wildlife habitat and the amount of water available to ensure healthy salmon populations.** Our recommended changes are as follows:

- p. 8-7: Policy 8A-1: revise to: "Conserve productive agricultural lands and agricultural resource lands, including areas with prime soils which that are not now zoned agriculture, or where the area is composed of agricultural operations that have historically been or continue to be economically viable. by developing and implementing a long range strategy."
- p. 8-8: Policy 8A-2, the last bullet point: This policy should address impacts to instream uses. Change to: "Securing an adequate, sustainable and legal supply of irrigation water sufficient to support the long-term viability of the local agricultural industry with special consideration given to ensuring water is available for instream uses."
- p. 8-13: Policy 8E-2: Change to: "Work with farmers to implement measures, including installing fencing, to prevent livestock from accessing rivers and streams and degrading riparian and instream habitat."
- Policy 8F-1: The agricultural community has a seat on the WRIA 1 Planning Unit and represents its own interests. This policy should be re-written, to reflect the current situation, as follows: "Encourage the agricultural sector to actively participate in the WRIA 1 Watershed and Salmon Recovery Programs."

Mineral Resources:

We feel this section of Chapter 8 is weak in its consideration of the real impacts to fish, wildlife, habitat and water quality. We are particularly concerned with the Riverine Areas section. As is outlined in the introduction of this section, "Although the public believes river bar scalping will significantly reduce flooding along the entire river, its benefits are local and it may have negative effects in areas surrounding the mining site." Best available science¹ tells us that river

¹ Kondolf, G.M., M. Smeltzer, and L. Kimball. Freshwater Gravel Mining and Dredging Issues. White Paper prepared for Washington Departments of Fish and Wildlife, Ecology, and Transportation, 2002.

Church, M., Fraser River: Managing the gravel reach; gravel mining is not the solution, 2012.

Hume, M., The Globe and Mail, New report digs deeper on effects of gravel mining in Fraser River, March 24, 2013.

Element Solutions, The Nooksack River Sediment Pilot Project Analysis, 2013.

Washington State Department of Fish and Wildlife official SEPA response; Joel Ingram, 2013.

The Lummi letter from the LIBC, dated 9-28-1995, on the subject of Nooksack River Gravel Scalping and the Lummi Indian Business Council (LIBC) Resolution # 93-135.

scalping has little if no value in reducing flood risk. The negative impacts to habitat, fish populations and water quantity and quality far outweigh any benefits of this expensive and harmful practice. The introduction to this section clearly lays out that the economic and environmental costs are too high to allow for river bar scalping in Whatcom County. **For these reasons we ask that this entire section and its policies be removed from the Comp Plan.**

Thank you for your time and attention to our suggestions. If you have any questions, please contact either or Ann Russell (annr@re-sources.org) or Kate Blystone (kateb@re-sources.org).

Sincerely,

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