



**Draft 2025-2029 Lake Whatcom Management Program Work Plan
Public Comments and Questions Received July 25 – August 25, 2024 with Staff Response**

Overview: This document summarizes the public comments received during the public engagement process for the [Draft 2025-2029 Lake Whatcom Management Program Work Plan](#). It include a staff response to each comment and notes about any edits made to the final work plan. When comments included multiple topics, each distinct comment or question has been listed separately. Some comments have been paraphrased to consolidate or clarify the main idea(s).

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#	Rec'd through	Date	From	Comment/Question	Program Area	Policy (P), Organizational (O), or Substantive (S)	Staff Response	Work Plan Edit
1	Engage Bellingham	7/30/24	Randall, P	Sadly, the proposed Lake Whatcom Management Program update does absolutely nothing to address the pressing issues that threaten our reservoir. Obviously, the city has no real interest in improving and preserving our reservoir and is willing to suffer the inevitable consequences of losing it. As someone who has repeatedly engaged in this so-called "process" of managing the water quality of our reservoir, I feel utterly duped and have zero confidence that the city intends to do anything useful. The consequences of this inaction and deceitful waste of time in meaningless process, while the reservoir continues to decline will have severe impacts on the residents who depend upon the reservoir and will severely affect property values of homeowners once the water is unfit to drink. The city needs to act with urgency to preserve and upgrade all its essential infrastructure instead of ignoring the consequences of inaction and wasting time.	Overall	S	Without specific examples to address, a response to your general comment is difficult to provide. The City invests approximately \$10 million per year to protect and improve lake water quality, protect drinking water, and prevent invasive species. Furthermore, Whatcom County and the Lake Whatcom Water and Sewer District annually invest approximately \$4 million and \$1 million, respectively. Our annual Progress Reports summarize many of the investments we have made to protect Lake Whatcom. Over the past few years, data has shown that levels of pollution in the lake are beginning to stabilize. The issues in Lake Whatcom were created over more than one hundred years. Reversing this trend will take time.	
2	Email	7/29/24	Eric Hirst	Absent data on past progress and future needs, readers have no way to judge whether current programs need to be modified or expanded.	Overall	S	The purpose of the work plan is to define the roadmap for improvements to be implemented over the next five years; for information pertaining to past progress, please refer to the annual Progress Reports .	Added links to progress reports
3	Email	8/24/24	Christina Maginnis	Though the current work plan version is comprehensive in scope for the variety of programs funded and carried out annually, the accountability in every program area needs to be improved to demonstrate that actions are met consistently and correctly.	Overall	S	We have added more reporting metrics to the updated work plan to increase accountability. The LWMP publishes annual Progress Reports , as well as accomplishment reports every five years. These are the best places to find details about the work that is completed each year. For the work plan items that don't have measurable reporting metrics associated with them, we will explore ways to more clearly report out on the completion of these items in future progress reports to increase accountability.	Added more reporting metrics and added links to progress reports



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4	Engage Bellingham	8/19/2024	Rick Eggerth	In general, this draft is long on aspiration and general goals, but far too short on details. How processes work, how fixes will specifically be accomplished, and what the metrics for success or failure need to be included throughout the entire draft.	Overall	S	The work plan is intended to be a broad overview of the work that is planned for protecting Lake Whatcom over a five-year period. More details about our programs, projects, and the work completed can be found on our website and in our annual progress reports. That said, more explanation and reporting metrics throughout the document have been added in response to your comment.	Added an explanation about the intention of the work plan (under “Five-Year Work Plans section”) and added more reporting metrics and details.
5	Email	8/25/24	Whatcom Environmental Council	Does a real plan for implementation by staff exist? This document reads not like an implementable plan, but as the executive summary of a plan meant to give the public a high-level briefing. Such a high-level public summary makes good sense, and may be what most people desire, but there ought to be discussion making it clear that a real implementable plan exists that contains details, responsibilities, timelines, deliverables, etc., and links to those details should be provided so the more curious public can get into the weeds if they want. A list of “Resources” is included at the end of the document where some of the details may be available, but there are no links or references provided to these “resources” in the brief descriptions of the plan’s elements, so the connections to this list of information are difficult to make. Please provide in this document a description of where the detailed plan is at, and links within the descriptions of each program element to the more detailed plans and other resources that apply to it.	Overall	S	This document is indeed intended to be a high-level overview of the work that is planned over a five-year period. There are countless staff involved in making this work happen who each have individual responsibilities and timelines for meeting the goals in the work plan. The LWMP partners report out on the work that is done each year in our annual progress reports. Integrating the “resources” and links throughout the work plan is a great idea. We have added relevant hyperlinks and resources to each program area for people who would like to read more detail.	Added links throughout the document.
6	Email	8/23/24	RE Sources	Assessing Progress Toward Successful Outcomes Across the work plan program areas, the objectives and reporting metrics as written do not provide context or means for readers to assess progress toward defined goals and outcomes. The Plan should include strategic, measurable, achievable, relevant, and time-bound goals (SMART Goals) to measure progress over the 5 years that this plan is implemented. Special attention should be paid to the reporting metrics sections, where the plan identifies items to measure but does not yet include any measurable goals (for example, one metric under Recreation says “number of pet waste stations maintained in the watershed each year,” but doesn’t specify that our goal is to maintain 10, 20 or 100 of them).	Overall	S	SMART goals were recommended by several commenters as a way to set expectations and measure progress towards those expectations. In order to do that, we re-evaluated each program area goal to state them more clearly. We also better aligned the metrics with the work plan actions to help us remain accountable. We will continue to do transparent reporting each year on our progress toward each of the metrics in the work plan through annual progress reports. Here's how our work plan aims to meet the criteria of SMART goals: Specific - We outline specific actions in each program area that will help us meet our goals. Measurable - We have reporting metrics that are aligned with the actions in each program area to help us measure progress towards each goal. We report on these metrics annually to track progress and be transparent. Achievable - The goals, objectives, and actions are written in consideration of our anticipated resources and staff time to ensure that they can actually occur in a five-year time period. The goals also provide room for flexibility so we can adapt to the community's needs over time. Relevant - All of the goals, objectives, and actions within the work plan help protect the Lake Whatcom watershed.	Updated the goals, objectives, and actions to better fit into the SMART goal framework, added more reporting metrics, and better aligned these metrics with the actions.
7	Email	8/24/24	Whatcom Million Trees Project	Implement SMART Goals Throughout the Report SMART goals are a well-established, effective approach to set and reach goals. SMART stands for specific, measurable, achievable, relevant, and time bound. We advocated this approach to improve Bellingham's Urban Forest Plan draft report and likewise strongly recommend it here. Across all program areas, LWMP Work Plan objectives and reporting metrics should follow this approach.	Overall	S, O		



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				Currently, many of the statements are too 'fuzzy' to provide direction for future policy decisions and staff actions or to measure progress over the five years that this plan will be implemented.			<p>Time-bound – The goals are intended to be met within a five-year time period (by 2029).</p> <p>Our intention is to continually increase and improve our efforts, but it is difficult to assign specific quantities to each of our work plan items since these items are all influenced by a variety of factors, including current information available, priorities, staff capacity, policy, and more.</p> <p>Since this a five-year work plan, it is intended to be a broad guiding document that provides flexibility so that we can adapt our management strategies to meet current needs and conditions.</p>	
8	Email	8/24/24	Mt Baker Group-Sierra Club	A key point that we would like to emphasize is that the draft is largely aspirational, with many general goals. It would be improved through the inclusion of specific goals, including metrics to define success or failure, process definitions, and details regarding the implementation of solutions.	Overall	S	The work plan is intended to be a broad overview of the work that is planned for protecting Lake Whatcom over a five-year period. More details about our programs, projects, and the work completed can be found on our website and in our annual progress reports. That said, more explanation and reporting metrics have been added throughout the document in response to your comment. Furthermore, we have incorporated SMART goal criteria as described in the response to Comments 6 and 7.	Added an explanation about the intention of the work plan (under Five-Year Work Plans section) and added more reporting metrics and details.
9	Email	8/23/24	RE Sources	<p>Adaptive Management</p> <p>The work plan and its annual reports should provide a clear narrative for readers as to how effective work plan actions have been in advancing progress toward high level goals. In the case of actions or program areas that are not proving to be effective in meeting Management Program Goals, there should be a clear plan laid out for how to address shortfalls through the improvement of existing actions or selection of new strategies moving forward. Within several program areas, it is unclear how previous studies, surveys, and assessments named in past reports are informing adaptive management actions in this upcoming work plan. The results of the evaluations and reports identified in the previous work plan should be referenced and incorporated into the appropriate sections of the next work plan draft, along with description of how they have informed actionable next steps.</p>	Overall	S	Our work plans are informed by current information, technology, community priorities, staff capacity and more. There are a variety of studies and reports available on our website that we use to inform our work focus areas. We have added more links and references to these documents throughout the work plan and have expanded the discussion of the use of adaptive management throughout the plan.	Added more links throughout the document. Added an Adaptive Management section to the intro of the work plan.
10	Email	8/24/24	Whatcom Million Trees Project	<p>Reinforce an Adaptive Approach</p> <p>There's no indication of how previous studies, surveys, and assessments from past reports inform this five-year work plan. This should be referenced in each applicable section, with a description of how they inform the work plan's next steps. Similarly, this adaptive</p>	Overall	S		



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				emphasis should occur in annual reporting so that adjustments to implementation actions can incrementally occur as needed.				
11	Email	8/24/24	Christina Maginnis	While all 12 program areas provide necessary actions with details of outcomes, it is unclear why the reporting metrics in this version of the work plan leave out or do not match the work action deliverables from each program area. If this is done on purpose due to this being “a plan”, then please provide a different document to show actual actions completed in each of the 12 program areas.	Overall	S	More reporting metrics have been added or adapted to better align with the actions under each program area. The best place to find actual actions completed in each of the 12 program areas each year is our annual Progress Reports .	Added and adapted reporting metrics in all program areas.
12	Email	8/24/24	Christina Maginnis	If the reporting metrics currently listed are provided to meet the Department of Ecology Lake Whatcom TMDL, then please state that that is their purpose. Since the overall LW Management program purpose is not, “to meet the TMDL”, I'd recommend that adding other reporting metrics in each program area would make the reporting metrics list a more complete assessment of annual work.	Overall	S		
13	Email	8/24/24	Christina Maginnis	In my opinion, as a private citizen, if work actions are not reported annually, how does one know it was done? If the actions are successful, please share them on a website or a news release! If actions are not met, there needs to be discussion at the policy group and elected level, to determine why not, what barriers occurred, and most importantly – what changes are needed to reasonably ensure the next year the actions are successfully completed. Please also consider how increasing the reporting metrics allows the public and elected leaders to better gauge progress, and understand how the money is spent on program actions. I am making this comment after observing multiple meetings where staff clearly explained barriers out of their direct control, and how sometimes their best effort was not necessarily able to deliver the expected outcomes. After 30 years, the annual successes this joint Lake Whatcom Management Program has accomplished also needs to be balanced with areas for improvement.	Overall	S		
14	Engage Bellingham	8/17	Mabel	Reinstate the WAB that Eric Johnson and his Deputy manipulated the now defunct citizens board to eliminate.	Overall	S	Bellingham City Council replaced the WAB with the Water Resources Advisory Board (WRAB).	



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15	Email	8/25/24	Silver Beach Neighborhood Association	Members of the Silver Beach Neighborhood Association requested that I also submit the information that we shared during the rezoning process of the multi-family parcels within the Silver Beach Neighborhood. <u>20240825 Silver Beach Neighborhood Association</u> (see pages 2-7)	Overall	P	City staff considered these comments from the Silver Beach Neighborhood Association during the rezone and regulatory changes to BMC 15.42 regarding multi-family development in the Lake Whatcom watershed. Staff prepared responses to these comments and presented them to the Planning Commission during a work session on April 11, 2024. That staff response was also included in the May 20, 2024 packet that was provided to the City Council for their initial public hearing. The result of the rezone was that City Council approved the rezone for the LOW DENSITY in the multi-family zones in the Silver Beach Neighborhood zoning table, consistent with the Association’s comments.	
16	Email	8/25/24	Silver Beach Neighborhood Association	Additionally, the Planning Department has decoupled neighborhood plans from the Comprehensive Plan. We request that Chapter 9 of the Silver Beach Neighborhood Plan (https://cob.org/wp-content/uploads/silver-beach.pdf) be incorporated into the Lake Whatcom Management Plan and ask for assistance in maintaining and tracking the effectiveness of the programs within it.	Overall	P	The objectives and actions identified in Chapter 9 of the Silver Beach Neighborhood Plan are addressed within the LWMP with the following exceptions: 1) A Silver Beach Association representative may apply to be on the Water Resource Advisory Board through the established City application process and/or can attend the Lake Whatcom Policy Group Meetings. (LWPDWO #3); and 2) “Fish” related actions are the sole responsibility of WDFW. (LWPDWO #13 & LWPDWA #23)	
17	Email	8/25/24	Whatcom Environmental Council	In the statement from the Mayor, Executive and General Manager it is stated the plan is on track to provide “healthy habitat for wildlife”, yet there are only a couple of passing references to wildlife in the entire document. Why is there not an entire Program Area on Wildlife like there is for recreation, forest management, and utilities & transportation?	Overall	S	The existing Program Areas are focused on human management to help achieve our goal of improving watershed health, which includes wildlife habitat. Managing human activities helps to mitigate impacts to the entire Lake Whatcom ecosystem. The statement has been revised to reflect a “healthy ecosystem”.	Revised statement to reflect a “healthy ecosystem”
18	Email	8/24/24	Christina Maginnis	This current collaboration would be improved by the Sudden Valley Community Association architect and development engineer attending LW policy group meetings, and engaging in the group policy discussions. They are the other “decision-makers”, namely a private homeowners association, in the watershed, which currently has no direct role in this work planning effort, and yet they have the MOST small-lot, urban-level potential development lots remaining in the watershed that fall under County codes, Lake Whatcom water and sewer district utility requirements, and specific community HOA Agreements. It is both urgent and important that City, County and LW Water and Sewer District staff communicate with Sudden Valley Association staff while completing this work plan to request and follow up on any comments on this work plan given their unique role.	Overall	P	Recognizing the important role that the Sudden Valley Community Association plays in the health of the watershed, the LWMP partners expanded the Policy Group in 2014 to include a representative of the SVCA. Similar to the expectation that City, County and District Policy Group members relay Lake Whatcom Management Program information to their respective council/board and seek agency policy positions, so too is that an expectation of the SVCA Policy Group member.	
19	Engage Bellingham	8/25/2024	Peter Englander	We live in the watershed, swim and paddle in Lake Whatcom. We are a great deal about the health of Lake Whatcom. We are struck by the following: 1. Three jurisdictions could easily result in significant	Overall	S	Please refer to the Program Overview sections of the work plan. The three agencies adopted a joint resolution in 1992 followed by an interlocal agreement in 1998 that formed the LWMP. The purpose of the LWMP is to better coordinate activities between jurisdictions and programs to reduce	



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				overhead and conflicting oversight. Seriously consider streamlining this approach.			redundancies and inefficiencies to the extent possible. The LWMP partners have since coordinated efforts in improving the health of the watershed, which currently includes, but is not limited to, monthly meetings of the data group and interjurisdictional coordinating team, quarterly meetings of the policy group, and annual meetings of the full City and County Councils and District Board of Commissioners.	
20	Engage Bellingham	8/25/2024	Peter Englander	Priorities are reflected in your budget. It appears that Land Preservation (buying land for permanent preservation) is the top priority, followed by Stormwater Management, Utilities & Transportation, Recreation and Aquatic Invasive Species and Monitoring and Forest Management. What strikes me is the amount of overlap in each section of this work plan, making for a longer more complex program and document than it needs to be.	Overall	S	<p>The purpose of the LWMP is to better coordinate activities between jurisdictions and programs to reduce redundancies and inefficiencies to the extent possible. Funding for the LWMP is included in multiple budgets based on the activity, funding source, and jurisdiction. Not all funding sources can be used for all of the program elements. For example, City funding for the Land Preservation comes from the dedicated Lake Whatcom Property Acquisition Fees.</p> <p>There are many ways this work plan could be organized. We believe that the current organization of the report strikes the right balance to provide sufficient details for each distinct program area.</p>	
21	Engage Bellingham	8/20/2024	Michael G. Allsop	I write this letter as a person who has lived on Lake Whatcom for 79 years in two houses on Northshore. I HAVE SEEN IT ALL WHEN IT COMES TO THE LAKE AND THE TOTAL WATERSHED. The sewer was designed and built by three people, myself being one. The sewer was designed to clean up the lake. The sewer was given to Water District 10 for one dollar. No upland property owners contributed. We watched both the county and railroad use chemicals to kill the weeds along the roads. This went on for 40 years. I grew up not seeing one eagle on the lake. The county built and ran, the dump in the aquifer for at least 40 years. The city, over the years, taxed lakeside owners to the point most large lot owners divided their lots which created many more homes on the lake. I saw the city connect the South fork of the Nooksack into the lake, load the lake with tons of sediment loaded with harmful chemicals. The latest disaster is the park and trails at the end of Northshore, which has 250,000 visits and growing, each year. If each visit creates 22 miles driven in the watershed times 250,000 equals 5.5 MILLION MILES. If you read the Olsen Creek SEPA you will see a projected 300,000 visits per year. This is done with NO traffic impact study or EIS. This has the same impact on the lake as hundreds of new homes built in the watershed. All the above and much more tell me the biggest polluters are the following: Whatcom County City of Bellingham DNR, WHATCOM LAND TRUST. You need to look in the mirror and if you need some help fixing the problems you have created you can contact me at the following. Regards, Michael G. Allsop	Overall	S	<p>This comment covers several topics. Responses are provided below by topic area.</p> <ol style="list-style-type: none"> 1. Historical Activities - It is true that historical activities have had a detrimental impact on the lake. 2. County use of herbicides in the watershed - The County does not use herbicides in the watershed for roadside weed control. 3. Middle Fork sediment - The watershed of the Middle Fork is undeveloped; no known harmful chemicals exist in the water of the Middle Fork Nooksack. The City uses operational protocols to limit the amount of sediment/turbidity delivered from the Middle Fork diversion. We limit diversion periods to times when turbidity and sediment load in the Middle Fork is low. 4. Sources of Phosphorus - The majority of phosphorus entering the lake comes from development and not from passive recreational activities. 5. Lake Whatcom Park traffic - Current visitation to Lake Whatcom Park averages below 250,000 per year and is expected to grow incrementally with implementation of the Lookout Mountain and Lake Whatcom Trail Plan. Whatcom County Parks and Recreation Department has additional undeveloped properties within the watershed (e.g., South Lake Whatcom Park) where future park development may create additional parking capacity to include stormwater mitigation facilities to accommodate increased recreational demand. Whatcom County Parks did not perform a traffic study prior to developing new recreational opportunities at Lake Whatcom Park, but did consult with Whatcom County Public Works to confirm that that expected traffic along North Shore Road 	



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							as a result of park development would be well within the level of service (LOS) requirements for North Shore Road. Currently, the planning for parking lot improvements at Lake Whatcom Park is at 30% design. As the project moves forward additional environmental review will be completed including SEPA which will specifically evaluate the need for traffic analysis.	
22	Email	8/25/24	Whatcom Environmental Council	Page 4, paragraph 1, last sentence; insert "protect streamflows," after water quality.	Intro	S	At this time, low stream flows have not been identified as a concern in the Lake Whatcom watershed.	
23	Email	8/25/24	Whatcom Environmental Council	Page 5, paragraph 1, second line; deterioration in the watershed started well before the 1980's. Re-write sentence so it is obvious deterioration did start well before the 1980's when planning to address the deterioration started.	Intro	S	Comment incorporated as requested.	LWMP Overview- History: changed to "when <u>the cumulative deterioration of Lake Whatcom's water quality from historic and ongoing land use in the watershed</u> was documented and brought to the attention of agencies and the community."
24	Email	8/25/24	Whatcom Environmental Council	Page 6, second to last bullet; the formal name is Middle Fork Nooksack River, not Middle Fork of the Nooksack River	Intro	S	Comment incorporated as requested.	Appendix- About the Lake: changed text to "Middle Fork Nooksack River"
25	Email	8/25/24	Whatcom Environmental Council	Page 7, first bullet; insert "and Best Management Practices" between principles and for.	Intro	S	Bulleted text is verbatim from the 1992 joint resolution; revision to the language would require amendment to the resolution by the three LWMP partners.	
26	Email	8/25/24	Whatcom Environmental Council	Page 8, third paragraph; insert "and forest resource lands" after developed areas and entering.	Intro	S	This section was rewritten to summarize the management challenges, and this exact phrase no longer exists.	Shortened section in Management Challenges to be more succinct.
27	Email	8/24/24	Mt Baker Group-Sierra Club	Addressing the Challenges (Page 8) "Objective 1: Water quality in the lake is restored to protect human health and support a diverse ecosystem." Your "Response" only addresses what is being done, not what can or should be done to improve lake water quality. In addition, it does not provide success/failure metrics and fails to address the city and county land acquisition programs.	Intro	S	The Management Challenges section is meant to serve as an overview of LWMP objectives, challenges associated with each objective, and how the LWMP partners are working to overcome the challenges to meet the associated objective, not to define specific actions and associated metrics to monitor progress towards objective attainment. This section has since been rewritten. More information about specific programs and relevant actions is provided in each program area.	This section was re-written to better relay the section's intent. Information about the City's Dissolved Air Flotation pretreatment system was added to the



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28	Engage Bellingham	8/19/2024	Rick Eggerth	In this comment box I look at the "Addressing the Challenges" section that begins on page 8. The Objectives described therein should be further detailed, as addressed below. For "Objective 1: Water quality in the lake is restored to protect human health and support a diverse ecosystem," your "Response" only addresses what is being done, not what can or should be done better. In addition it does not provide success/failure metrics. And it fails to address the city and county land acquisition programs.	Intro	S	In regard to clogged water intake structures, the City built a Dissolved Air Flotation pretreatment system at its Water Treatment Plant in 2018 to help remove algae.	Management Challenges section.
29	Email	8/24/24	Mt Baker Group-Sierra Club	Addressing the Challenges (Page 8) "Objective 2: Clean, safe drinking water is available for more than 100,000 Whatcom County residents and its source is protected from pollution." Your "Response" does not mention mitigation measures when, as the "Management Challenge" of the section indicates, the intake structures can clog and treatment can be compromised. The section focuses on prevention, not remediation. What mitigation measures are needed and how will they be implemented?	Intro	S/P		
30	Engage Bellingham	8/19/2024	Rick Eggerth	For "Objective 2: Clean, safe drinking water is available for more than 100,000 Whatcom County residents and its source is protected from pollution," your "Response" does not mention what is done when, as the "Management Challenge" of the section indicates can happen, the intake structures clog or treatment is interfered with. This focuses on prevention, not remediation. What happens if a clog happens?	Intro	S		
31	Email	8/24/24	Mt Baker Group-Sierra Club	Addressing the Challenges (Page 8) "Objective 3: High quality recreational opportunities around the lake are available, accessible, and managed in a way that preserves the health of forests and waterways." Your "Response" assumes that "most recreational activities in the watershed contribute positively to our community and our quality of life", without addressing how water quality is harmed by such recreational activities. It seems unlikely that boating, swimming, and erosion from hiking, biking and other activities contributes positively to our community water quality. Negative impacts from recreational activities need to be defined and specified metrics are necessary to determine success or failure in remediating those impacts.	Intro	S		



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32	Engage Bellingham	8/19/2024	Rick Eggerth	For "Objective 3: High quality recreational opportunities around the lake are available, accessible, and managed in a way that preserves the health of forests and waterways," your "Response" assumes that "most recreational activities in the watershed contribute positively to our community and our quality of life" without addressing how water quality is harmed by such recreational activities. It seems unlikely that boating, swimming, and erosion from hiking, biking and other activities contributes positively to our community water quality, especially when boating and its impacts aren't specified or detailed. Speaking in generic, aspirational terms, as this section does (and as the entire draft does) isn't helpful in focusing on how problems might be fixed. Much more detail and success/failure metrics need to be provided.	Intro	S		
33	Email	8/22/24	Bob Mitchell, Climate Impact Advisory Committee Member	Objective 3 (p. 9): Our Response. Include a statement about transitioning/educating the boating community about electric watercraft.	Intro	S	Education about boating has been included in Section 6.3. Also see Section 11.2.6.	Added new section 6.3: Boating
34	Email	8/24/24	Mt Baker Group-Sierra Club	Addressing the Challenges (Page 8) "Objective 4: A high quality of life is maintained for our community and watershed residents." Your "Response" says that the LWMP works "to protect watershed health and water quality which, in turn, protects quality of life and property values." The draft fails to recognize or address that environmental protection also protects quality of life and property values. Without this recognition, the LWMP misses what should be a central focus and major consideration, especially given that two of the "Program Goals" on page 7 are "to protect, preserve and enhance water quality" and also "to prioritize protection over treatment." These goals are incomplete without the incorporation of environmental protection, including climate change goals.	Intro	S	This section was shortened, since it is not the main focus. It states that protection improves quality of life.	Shortened section in Management Challenges to be more succinct.
35	Engage Bellingham	8/19/2024	Rick Eggerth	For "Objective 4: A high quality of life is maintained for our community and watershed residents," your "Response" says that the LWMP works "to protect watershed health and water quality which in turn protects quality of life and property values." But the draft fails to recognize or address that environmental protection also protects quality of life and property values. Without such recognition the entire LWMP misses what should be a central focus and major consideration, especially given that two of the "Program Goals" on page 7 are "to protect,	Intro	S		



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				preserve and enhance water quality" and also "to prioritize protection over treatment." Addressing environmental protection, which includes but is not limited to climate change goals, needs to be part of this section and of the entire draft.				
36	Engage Bellingham	8/19/2024	Rick Eggerth	In addition this "Objective 4" section also says that: "Property owners are encouraged to install water quality landscape improvements. Residents are provided a guide to watershed living that gives them information and resources to enjoy their property without contributing to ongoing problems." But all of this is advisory, not mandatory. What if residents don't go along? What if they don't read the guide and contribute to ongoing problems? This is not only possible, but likely, at least for some residents. How will that be dealt with? And as for the "rules for development in the watershed that ensure residents can enjoy their property while protecting the lake" that are mentioned here: What are they? How effective are they? These details are important and must be provided.	Intro	S	<p>The City and County are using a voluntary approach to retrofitting residential landscaping for water quality improvements when not associated with a building or other permit through the Homeowner Incentive Program (HIP) and Neighborhood Native Landscaping Program (NNLP). We believe that this is currently the best approach for getting residents to make improvements and have successfully engaged with residents through these programs.</p> <p>Since 2011, more than 250 properties in the Lake Whatcom watershed have completed residential stormwater projects. In 2023 alone, 72,000 square feet of lawns and landscaping were improved through HIP and NNLP. You can find more information about program participation in our annual progress reports.</p>	
37	Email	8/24/24	Mt Baker Group-Sierra Club	<p>Addressing the Challenges (Page 8)</p> <p>"Objective 4" also says that: "Property owners are encouraged to install water quality landscape improvements. Residents are provided a guide to watershed living that gives them information and resources to enjoy their property without contributing to ongoing problems."</p> <p>The purely advisory nature of these landscape improvements increases the likelihood that many residents will fail to act in the best interests of the lake. What are the "rules for development in the watershed that ensure residents can enjoy their property while protecting the lake"? How will these rules be implemented and enforced? If failure occurs, what additional measures will be implemented? Without these important details, this program is unlikely to be successful.</p>	Intro	S	<p>Furthermore, it is unclear if making improvements mandatory without a permitting nexus is legal. Development regulations in the City are located at BMC 16.80 and for the County are located at WCC 20.51.</p>	
38	Email	8/24/24	Mt Baker Group-Sierra Club	<p>Addressing the Challenges (Page 8)</p> <p>"Objective 5: All of the uses and benefits of the lake are protected from aquatic invasive species infestations."</p> <p>Your "Response" fails to mention that the AIS program is not conducted year-round. Given the existing perennial use of the lake, the lack of continuous monitoring increases the likelihood of missing aquatic invasive species infestations. This major omission needs clarification, details for operating continuous monitoring are needed, and metrics should be established to define success or failure.</p>	Intro	S/P	<p>The City is considering operational changes to fill gaps in the inspection program during this five-year cycle.</p> <p>Also see comment #222.</p>	



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39	Engage Bellingham	8/19/2024	Rick Eggerth	For "Objective 5: All of the uses and benefits of the lake are protected from aquatic invasive species infestations," your "Response" fails to mention the fact that the AIS program is not conducted year round! How effective can it be if it doesn't work the whole year? Boaters operate the whole year. This glaring omission needs to be addressed, and details for how the program could operate all year must be provided.	Intro	S		
40	Email	8/24/24	Mt Baker Group-Sierra Club	Addressing the Challenges (Page 8) "Objective 6: Create resiliency by adapting to changing weather patterns and ecological conditions due to climate change impacts to Lake Whatcom and its watershed." The "Management Challenge" part of this Objective predicts significant climate warming "by 2100.", despite the immense scientific information proving that we are already experiencing the impacts of global warming and have been for years. Using 2100 as a benchmark implies that there is much more time to "create resiliency" than is in fact the reality. The "Management Challenge" section does go on to state that climate change will require programs that "mitigate for carbon emissions, adapt programs and practices due to changes in weather patterns, and build climate resiliency" but then, in the following "Response", there is no detail provided as to what programs currently exist or will be needed in the future. This is a crucial deficit that needs to be addressed with specific mitigation measures, timelines for implementation, program costs, and metrics to assess success. The plan should also include preservation of mature trees, which are essential to mitigating temperature rise and optimizing carbon sequestration.	Intro	S	See Climate Action Program Area, which references City and County Climate Action Plans and the Lake Whatcom Climate Vulnerability Assessment.	Shortened section in Management Challenges to be more succinct. It is no longer an overall objective. Each program area is an objective, including Climate Action.
41	Engage Bellingham	8/19/2024	Rick Eggerth	For "Objective 6: Create resiliency by adapting to changing weather patterns and ecological conditions due to climate change impacts to Lake Whatcom and its watershed," the "Management Challenge" section mentions significant climate warming "by 2100." But why that year? Significant warming is already happening! Using 2100 as a benchmark implies that there is much more time to fix things than is in fact the reality. The "Management Challenge" section goes on to state that climate change will require programs that "mitigate for carbon emissions, adapt programs and practices due to changes in weather patterns, and build climate resiliency," but then in your following "Response" there is no detail provided as to what programs there currently are, or what programs will be needed in the future. Only general, aspirational programs without detail are mentioned. The	Intro	S		



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				public deserves to know what the programs are or will be, how they will work, and how their success (or failure) will be measured. Not to mention what they will cost.				
42	Email	8/22/24	Bob Mitchell, Climate Impact Advisory Committee Member	Objective 6 (p. 10): Management Challenge add the bold text to sentence two: ... higher average temperatures and drier summers ,...	Intro	S	Comment incorporated as requested.	Added the underlined text to the Climate change section under Additional Challenges: ... higher average summer temperatures, <u>drier summers</u> , and...
43	Email	8/25/24	Whatcom Environmental Council	Page 10, last paragraph, last line; insert “,streamflow quantities” between quality and.	Intro	S	See comment #22	
44	Email	8/25/24	Whatcom Environmental Council	Page 11, second paragraph, third line; insert “including management of forest resource lands” after activities.	Intro	S	Management of forest resource lands, with its inclusion as a new program area, falls under the generally defined “ongoing LWMP activities” and is, therefore, redundant.	
45	Email	8/24/24	Mt Baker Group-Sierra Club	Focus on Phosphorus (Page 12) The draft’s discussion of “Why is phosphorus a problem?” mentions that “algae also impact water quality taste and odor and add to water treatment costs,” and that “some types of algae are toxic and can cause health issues for swimmers and pets.” This suggests that toxic algae can also harm those who drink affected water. The draft should detail current the current level of health impacts due to algae, measures to mitigate those effects, and metrics to monitor ongoing issues.	Intro	S	The subject section is meant to provide an overview to the general public of why there is a specific focus on reduction of phosphorus and bacteria (and their associated impacts) throughout the work plan, not to define specific actions and metrics, or identify the various supporting documents that define associated actions with addressing/mitigating these contaminants (please refer to the Resources sections in each program area of the work plan for links to the supporting documents).	
46	Engage Bellingham	8/19/2024	Rick Eggerth	This is further to the comment I already submitted. The draft’s discussion of “Why is phosphorus a problem?” (page 12) mentions that “algae also impact water quality taste and odor and add to water treatment costs,” and that “some types of algae are toxic and can cause health issues for swimmers and pets.” This sounds like toxic algae can also harm those who drink affected water. The draft should either explain why this can’t be a problem or explain how toxic algae is prevented from harming water drinkers.	Intro	S		
47	Email	8/24/24	Mt Baker Group-	According to the draft, phosphorous loading is reduced by, among other things:	Intro	S		



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			Sierra Club	<ul style="list-style-type: none"> • “Constructing, operating, and maintaining stormwater treatment facilities.” <p>What is the current status of stormwater treatment facilities and are they reducing phosphorous loading to an acceptable level, based on defined metrics? If not, what is the mitigation plan?</p> <ul style="list-style-type: none"> • “Providing residential retrofit programs to reduce phosphorus pollution from existing developed lots.” <p>Do these programs exist? How will they be implemented and measured and what are the related costs?</p> <ul style="list-style-type: none"> • “Preserving land in the watershed that might otherwise be susceptible to development or other land disturbance activities.” <p>Is there a defined plan to accomplish this and is it being implemented? Is the current level of development adhering to a plan that minimizes phosphorous loading?</p>				
48	Email	8/24/24	Mt Baker Group-Sierra Club	<p>The draft also mentions that “city and county are required to make continued progress toward TMDL targets.”</p> <p>Do these targets exist and are they being met? What are the specific plans and metrics to ensure that “continued progress” occurs?</p>	Intro	S		
49	Email	8/24/24	Mt Baker Group-Sierra Club	<p>A discussion of bacteria is also included (page 13), noting that: bacteria can flow into the lake; the TMDL requires addressing the sources of these pollutants; and helping to reduce bacteria with stormwater filtration improvements; encouraging residential animal waste management; and educating homeowners about septic systems.</p> <p>None of this explains if bacterial TMDL is actually being measured, how the current measurement compares to a target goal, what current programs have been implemented, and what additional programs may be required. All of these specifics are needed for this section to be meaningful.</p>	Intro			
50	Engage Bellingham	8/19/2024	Rick Eggerth	<p>The draft also discusses bacteria (page 13), by noting that: bacteria can flow into the lake; the TMDL requires addressing the sources of these pollutants; and stormwater filtration improvements, encouraging residential animal waste management, and educating homeowners about septic systems help to reduce bacteria. But none of this explains how bacteria in the lake is actually being fixed. Is anything being done to reduce or eliminate bacteria once in the lake? What? And how successful is it? And how does “addressing the sources of these pollutants” identified in the TMDL actually work? Ultimately, does any</p>	Intro	S		



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				of this stop the bacteria? Or is it merely reduced? And if merely reduced, to what level, and how safe is that level?				
51	Email	8/25/24	Whatcom Environmental Council	Page 17; there is a need to also address forest resource lands, not just developed areas.	Intro	S	In response to the Stormwater Management goal on page 18, the Lake Whatcom TMDL requires management of stormwater runoff from developed areas, not forested areas (including forest resource lands).	
52	Email	8/22/24	Bob Mitchell, Climate Impact Advisory Committee Member	P. 18 add the bold text to #6. Recreation – Provide access to recreational opportunities that are consistent with water quality and climate change goals.	Intro	S	Staff decided to change “water quality and climate change” to “watershed health and land management” which includes climate change goals.	Changed #6 Recreation goal to “Provide access to recreational opportunities that are consistent with watershed health and land management goals.”
53	Email	8/25/24	Whatcom Environmental Council	Page 19, item 11; after increased temperatures insert “reduced streamflows.”	Intro	S	Current climate models do not predict a uniform reduction in stream flows, but rather higher variability in rainfall patterns meaning that stream flows will be impacted at times higher than historical averages and other times lower.	
54	Email	8/25/24	Whatcom Environmental Council	Page 19, item 12; after water quality insert “and quantity.”	Intro	S	At this time, low stream flows have not been identified as a concern in the Lake Whatcom watershed.	
55	Engage Bellingham	8/19/2024	Rick Eggerth	“Preserving land in the watershed that might otherwise be susceptible to development or other land disturbance activities.” How is this being done? If land is being preserved, then why is so much development still happening?	Land Preservation	S	The City of Bellingham has implemented the Lake Whatcom Acquisition Program to strategically purchase undeveloped land from willing sellers to reduce overall potential development. The limiting factor for acquisition is willing sellers. While development continues, it is at a much slower pace and lower density than elsewhere in the City/County. Further regulations prohibiting property subdivision in the Watershed have created a finite quantity of remaining properties that may be developed. To minimize the impact of development that is still occurring, both Whatcom County and the City of Bellingham have implemented development regulations within their respective jurisdictions of the watershed that are more stringent than regulations outside of the watershed.	
56	Engage Bellingham	8/19/2024	Rick Eggerth	How was the \$28.4 million investment figure estimated? The draft mentions that the “Lake Whatcom Management Program acquires lands for the protection of water quality” and more. But is it the Program doing the acquiring, or the City of Bellingham and Whatcom County? And if it is in fact the Program, who actually makes the determination and where does the money come from?	Land Preservation	S	Each jurisdiction in LWMP may purchase land with funds from its own revenue source to carry out our common goal. The \$28.4m is the combined forecasted acquisition budget across all partners. In the case of the specific Land Preservation program area for the LWMP, the City of Bellingham has taken the lead role due to its revenue stream from its Lake Whatcom Property Acquisition Fees, the revenue projections of which make up the	



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57	Email	8/24/24	Mt Baker Group-Sierra Club	<p>The draft mentions that the “Lake Whatcom Management Program acquires lands for the protection of water quality” but fails to address many specifics:</p> <p>Is the Program doing the acquiring, or the City of Bellingham and Whatcom County?</p> <p>If it is in fact the Program, who actually makes the determination and where does the money come from?</p> <p>How was the \$28.4 million investment figure estimated?</p>	Land Preservation	S	<p>majority of the estimated budget. Whatcom County also supports this role through the use of its countywide Conservation Futures fund. Please refer to the Funding Sources section for information specific to how each program area is funded, and the Resources section under each program area for links to associated plans/programs that provide specific information relative to actions supporting land acquisition.</p> <p>Selling Property in the Lake Whatcom Watershed - City of Bellingham (cob.org)</p>
58	Email	8/24/24	Mt Baker Group-Sierra Club	<p>Under the “Property Protection” sub-section, property acquisition is said to be “based on evaluation criteria and availability.”</p> <p>What are the criteria and how is availability determined?</p>	Land Preservation	S	<p>Purchases are subject to willing sellers. The investment figure is based on forecasted purchases, staff costs, and standard predictions of market fluctuations in housing and inflation.</p>
59	Engage Bellingham	8/19/2024	Rick Eggerth	<p>Under the “Property Protection” sub-section, property acquisition is said to be “based on evaluation criteria and availability.” What are the criteria? How is availability determined?</p>	Land Preservation	S	
60	Email	8/24/24	Mt Baker Group-Sierra Club	<p>Under the “Property Management” sub-section, “management plans that address restoration needs” are mentioned.</p> <p>Who is responsible for these plans?</p> <p>What are the guidelines for preparing them and the required content?</p> <p>Is “the new document that will outline city response to requests for recreational development on city-managed properties” the LWMP or another document?</p> <p>Will the “city response” be appearing for the first time in “the new document”?</p> <p>Are such requests pending now?</p> <p>How will meaningful public participation be encouraged?</p>	Land Preservation	S	<p>City of Bellingham is responsible for management decisions for the Lake Whatcom Land Acquisition and Preservation Program (LWLAPP) properties. Baseline surveys and plans are built into Computerized Maintenance Management Software (CMMS) CityWorks.</p> <p>Because the LWLAPP is a City of Bellingham program, the City is responsible for these management decisions; the direct management of preserves is not part of the Lake Whatcom Management Program, but uses the Lake Whatcom TMDL as a guiding document to set management objectives. The City has criteria in these forms that follow the same goals and principles outlined in the TMDL for phosphorus reduction. Additionally, the City has statistical software that dovetails efforts with CityWorks to help evaluate performance of preserves and restoration efforts when needed.</p> <p>The City will be adapting principles from the original property management guidelines (Resolution 2005-09) to a more succinct and clear approach that is more up to date with current recreational pressure in the Lake Whatcom watershed.</p>
61	Engage Bellingham	8/19/2024	Rick Eggerth	<p>Under the “Property Management” sub-section, “management plans that address restoration needs” are mentioned. Who does these plans? What are the guidelines for preparing them? It is also said that “the new document will outline city response to requests for recreational development on city-managed properties.” What does that mean? Is “the new document” the current draft Management Plan? Are such requests pending now? Will the “city response” be appearing for the first time in “the new document”? Will there be meaningful public participation?</p>	Land Preservation	S	



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62	Email	8/25/24	Whatcom Environmental Council	Property Management section 1.2.2 describes a valuable new document (when will it be released?) that the City will use to make decisions about recreational development in the watershed. For consistency does a similar document exist for county recreational decision making? Should this guidance be linked to and discussed more in the Program Area 6 – Recreation section where impacts from recreation are discussed?	Land Preservation	S		
63	Engage Bellingham	8/25/2024	Peter Englander	There are many properties that are between public rights of way. Please consider more formal trail building to allow for more responsible use of these lands while also making wonderful pathways available in neighborhoods. As it is, it's hard to know whether this use is even allowed.	Land Preservation	P	Comment forwarded to the Lake Whatcom Policy Group for consideration.	
64	Email	8/23/24	RE Sources	1.1.1 Suggested language: "Actively seek properties to acquire with the goal of reaching a total of 1,000 additional acres acquired by 2030." Rationale: The city has been able to purchase between 113 and 161 acres each year from 2020 to 2023, for a total of 555 acres in those 4 years. As of 2023, there were 3,336 developable (vacant) acres left in the watershed (not including several thousand acres of private forestry land). A stretch goal of 1,000 acres over the next 5 years is not impossible at all, and would give the city an ambitious and yet attainable goal to work towards.	Land Preservation	P	The limiting factor for acquisition is willing sellers. Establishing an acquisition goal will not create willing sellers, but increasing outreach has been successful. Quantifying outreach efforts may be a better metric to evaluate how many willing sellers we've engaged with per year, or how effective we are at finding potential acquisitions.	Added "Number of property owners contacted each year" as a reporting metric for 1.1 Property Protection.
65	Email	8/24/24	Whatcom Million Trees Project	We suggest revising the wording of section 1.11 Property Protection in the following way: "Actively seek watershed properties with the goal of acquiring 1,000 additional acres by 2030." Discussion: The city has purchased between 113 and 161 watershed acres per year from 2020 to 2023, for a total of 555 acres in those 4 years. As of 2023, 3,336 developable (vacant) acres remain in the watershed (not including several thousand acres of private forestry land). A goal of 1,000 additional acres over the next 5 years is reasonable and would give the city an ambitious and yet attainable metric to work towards.	Land Preservation	P		
66	Engage Bellingham	8/16/2024	lbw	Once land is developed, an opportunity is lost to protect the lake from human impacts. Purchasing land for conservation is the highest and best use of funds spent to protect water quality. The plan is missing measurable goals which should be added before the plan is finalized. How many acres of land do we hope to acquire in the next 5 years? How do we know if we're succeeding if we don't establish a goal against which to measure the results?	Land Preservation	S	We have added more reporting metrics to the updated work plan to increase accountability. For the work plan items that don't have measurable reporting metrics associated with them, we will explore ways to more clearly report out on the completion of these items in future progress reports to increase accountability. The limiting factor to purchasing land for conservation is a lack of willing sellers, which makes it difficult to set a specific goal. Quantifying outreach efforts may be a better metric to	



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							evaluate how many willing sellers we've engaged with per year, or how effective we are at finding potential acquisitions.	
67	Email	8/24/24	Christina Maginnis	ADD: 1.1.2 Develop overall vision, goals and strategy to achieve successful outcome/endpoint of this program. Mayor and City Council need to provide leadership and direction to Public Works.	Land Preservation	P	Comment forwarded to the Lake Whatcom Policy Group for consideration.	
68	Email	8/24/24	Christina Maginnis	For future property purchases, consider focused outreach goals to owners of undeveloped properties along shorelines, contact property owners with onsite septic systems near lake shore, creeks, and any properties near the water intake in Basin 2 Work with LWWSD - Identify properties further than 250ft away from sewer where they can't legally connect to sewer. City/County/ LW Water & Sewer District consider outreach in 2025-2026 to ULID 18 lot owners before 2028, when LWWSD 25 year ULID expires, and 1038 lots can develop in watershed.	Land Preservation	S	Focused outreach to watershed residents is occurring as an ongoing effort. The City's Outreach Team is engaging watershed landowners annually and providing program information and the opportunity to sell to a cash buyer. Properties that are identified as a higher priority are contacted with additional levels of frequency and persistence. The City pursues a purchase with every willing seller of a property. Please refer to section II.A.1.d of the District's Comprehensive Sewer Plan (the link to which is provided in the Resources section of the Utilities and Transportation section): "Of the 1,100 parcels originally restricted, approximately 50 are "vacant" and not combined with other parcels or otherwise permanently restricted per recent Whatcom County assessor data. These 50 vested properties could potentially be developed starting in 2028." Therefore, potential magnitude of development is much less than the comment projects.	Added "Number of property owners contacted each year" as a reporting metric for 1.1 Property Protection.
69	Email	8/24/24	Christina Maginnis	Consider potential for City to buy easements, not entire property from shoreline homeowners add 35- 50ft native vegetation landscaping buffer to reduce runoff from lawns to the lake. Permanent shoreline protection with existing homes. Set a goal of 10% of shoreline lot easements in first 5 years.	Land Preservation	P	All shoreline properties have regulations for new uses that may include protection through a conservation easement. The Homeowner Incentive Program and Neighborhood Native Landscaping Program target properties for revegetation and lawn conversion.	
70	Email	8/24/24	Christina Maginnis	City property acquisition program needs to better understand of "Lot consolidation process in SV" - SV has 1400 "conservation lots" – need to define what this means – are these restricted from development permanently or can they be developed? Does this include City/WC and LW SWD purchased lots? Are they deed restricted? Or can they be swapped out for other lots, not currently conservation lots?	Land Preservation	S	In 1993, the SVCA membership approved a Density Reduction Program with the goal of eliminating 1,400 (30%) of the platted lots. In about 2000, the City, County and District began participating in the Program by providing financial support for the purchase of lots with the goal of reducing the number of developable lots in the Watershed. Under this Program SVCA purchased lots and received reimbursement from the LWMP partners; SVCA then permanently restricted from building the same number of lots as were funded by the joint effort. The density reduction goal of 1,400 lots was reached in 2007 and the Program has largely been idle since. All of this predates the creation of the City's Lake Whatcom Acquisition Program.	
71	Email	8/24/24	Christina Maginnis	ADD: County assess property purchase with stormwater utility funding for undeveloped lots for future stormwater facilities in Sudden Valley. Need better tracking of City/Whatcom County purchased lots in Sudden Valley from 2001-2004. 83 lots. Were they deed restricted	Land Preservation	S	Whatcom County partnered with the Lake Whatcom Water and Sewer District and the City of Bellingham and Sudden Valley to purchase 394 properties that all have permanent restrictive covenants prohibiting future development on those properties from 1998 to 2004. The covenants are recorded with the deed on the house and is included within the assessor's	



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				when purchased by City/Whatcom County? Are they part of the 1400 conservation lots?			database. Sudden Valley implemented their own density reduction program in 1994 establishing restrictive covenants on high priority parcels that resulted in the reduction of approximately 1,400 of their own properties. The utilization of the Lake Whatcom Stormwater Utility funding to assess the purchase of additional undeveloped lots in Sudden Valley is a policy decision that can be made by the Whatcom County Council.	
72	Email	8/24/24	Christina Maginnis	1.2.2 Update property maintenance guidelines to provide clarity for city field staff. The new document will outline city response to requests for recreational development on city-managed properties. ADD: the year this will be completed	Land Preservation	S	Like all action in this work plan, this will be completed in 2025-2029.	
73	Email	8/25/24	Whatcom Environmental Council	Page 20, In 1.2 Property management, first line; insert “and quantity” after water quality	Land Preservation	S	Water quantity has not been identified as a concern in the lake.	
74	Email	7/29/24	Eric Hirst	The plan offers no data on the progress to date in cleaning and protecting Lake Whatcom water quality and how much remains to be done. The plan includes a section on Reporting Metrics but provides no data. Here are some annual data that I think the Coordinating Team should include in the final 5-year plan: <ul style="list-style-type: none"> Acres purchased, development rights extinguished, cost per acre, funding sources. (In particular, to what extent are these land purchases funded by Bellingham and by Whatcom County?) 	Land Preservation	S	The majority of these metrics are recorded in the work plan. City of Bellingham is the only jurisdiction actively purchasing land in the Lake Whatcom watershed.	
75	Email	8/24/24	Christina Maginnis	Reporting Metrics: ADD: # of management plans implemented. New plans written per year ADD: Provide updated maintenance guidelines by 2025. Posted on website by January 2026.	Land Preservation	S	Management of Lake Whatcom Land Acquisition and Preservation Program properties is ongoing and carried out according to management plans created through baseline inspections with the City’s Computerized Maintenance Management Software (CMMS) software. The City aims to restore properties toward functioning forests and complete ecosystems, so work will not be seen as “completed” for some time. A baseline inspection is completed at every property upon purchase. Updated property management guidelines are part of the 2025-2029 Work Plan.	
76	Email	8/24/24	Mt Baker Group-Sierra Club	The “Reporting Metrics” should include, as well as “Total cumulative acres in protected status updated annually,” a comparison to total acres still undeveloped and a goal for total protected acres to ensure optimal lake health.	Land Preservation	S	Undeveloped land is reported on in the Buildout Report stated in section 3.1.2. Also, see comment #64.	
77	Engage Bellingham	8/19/2024	Rick Eggerth	Finally, the “Reporting Metrics” should include, as well as “Total cumulative acres in protected status updated annually,” a comparison to total acres still undeveloped.	Land Preservation	S		



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78	Email	8/25/24	Whatcom Environmental Council	There appears to be some overlap between program area 1.2 Property Management and other program areas such as Recreation, Transportation, and the new Program Element on Forest Management since these other program areas also include property management discussions. Perhaps the Land Preservation program section should focus just on the acquisition and preservation efforts, and leave the management of those lands to the other more focused program areas.	Land Preservation	O	How properties are managed is a significant factor in how they are preserved; thus, this information is included in this section.
79	Engage Bellingham	8/5/24	Jim Hansen	City is doing a good job but County needs to step up to the plate. Furthermore, forested areas under forestry use should stay that way and potential residential conversion sites should be targeted.	Land Preservation	S	Section 1.1.2 states we will evaluate the use of other programs to augment the City's acquisition program. This includes County programs. At this time, the limiting factor in acquiring more properties is willing sellers, not available funding.
80	Engage Bellingham	8/19/2024	Ricki	This should be a top priority. We do not need to develop more land. You could better utilize the developed land instead and focus on planning for the future (our children and grandchildren's future). Protecting and preserving the land should be the county and city's top priority as access to green and blue spaces improves mental health for all citizens and increases life and health expectancy for all. The city should invest time and resources to adapt the city in accordance with "Blue Zones". That means preserving green and blue spaces and minimizing the disruption of the land and animals that also live here. This isn't our land. We are the ones tasked with being stewards to the land and reducing our ecological impact. The Bellingham I call home isn't one that is interested in profit over purpose. If these funds are used to develop the land instead of preserving the land (which is actually CHEAPER for the city) then I will know that Bellingham isn't meant to be the city I raise my family in.	Land Preservation	S	This is one of several priorities.
81	Engage Bellingham	7/27/24	Holly	This should be a top priority (Land Preservation)	Land Preservation	S	
82	Engage Bellingham	7/29/24	Northshore Resident	Work with community partners like the Lummi and Nooksack Tribes, to help identify best practices for restoration of native plants and animal habitats.	Land Preservation	S	In the draft scope of work for the Lake Whatcom Forest Management Plan, a partnership between the City, County and pertinent federally recognized tribes are acknowledged as part of the stakeholder outreach and engagement process. This will include meetings, tours and opportunity for input.
83	Engage Bellingham	7/29/24	JHR	As well, preserve and create bird habitat. Education and incentivize home owners to do so.	Land Preservation, Education & Engagement	S	For watershed residents, robust incentive programs exist that provide both technical assistance and financial reimbursement to help homeowners plant native landscapes, which creates bird habitat. Both City and County programs provide resources to homeowners that help them use "right plant, right place" principles to install native trees, shrubs, and groundcovers that create habitat for many different native birds and animals. This effort is captured in the work plan under Section 2.2.3, which states, "Encourage the conversion of non-native landscape and lawn to native forested areas and the preservation of forested areas through incentives and permanent conservation agreements with landowners."



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84	Email	8/24/24	Mt Baker Group-Sierra Club	<p>Under “Capital Improvements” it is stated that new stormwater facilities and retrofits will be built in “in accordance with capital improvement and retrofit plans adopted by” COB and the County.</p> <p>The meaning of this language is vague. Do these plans already exist? What stormwater drains does this encompass; all of them or a smaller number? If a smaller number, why would some of them be excluded, to the detriment of lake quality?</p>	Stormwater Management	S	<p>For the City of Bellingham, the Lake Whatcom Retrofit Plan was created by the Storm and Surface Water Utility in 2021 and is currently in active implementation. It was required by the State as part of demonstrating compliance with our NPDES permit. The plan covers 100% of the City of Bellingham’s stormwater network inside the watershed and outlines a number of ongoing and future projects. All retrofits named in the city’s plan are already funded, with a combination of local funds and state grants, and all of those projects are programmed in the City’s capital construction program run by our Engineering Division.</p> <p>The County has an ongoing 6-year Water Resources Improvement Plan (WRIP) that is adopted annually that contains the stormwater treatment facilities and retrofits in the Lake Whatcom watershed.</p>
85	Email	8/24/24	Mt Baker Group-Sierra Club	<p>Mention is also made of “capital or retrofit list(s).”</p> <p>What are these lists and where are they found? Who prepares them? What are the guidelines for inclusion in the lists?</p>	Stormwater Management	S	<p>The City of Bellingham’s Lake Whatcom Retrofit Plan is prepared by City staff following the guidelines described in that Plan. In short, systems that treat stormwater have evolved over many years as technology and science has improved. As such, older systems built in the early years of the century are replaced with better performing systems when they reach the end of their life. The City includes all of our 57 stormwater treatment facilities in this assessment and has a long-term plan to operate, maintain, upgrade, and replace these systems on an ongoing basis.</p> <p>Whatcom County has an ongoing 6-year Water Resources Improvement Plan (WRIP) that is adopted annually that contains the stormwater treatment facilities and retrofits in the Lake Whatcom watershed. The County utilizes sub-watershed planning efforts, field verification, and previously identified project sites to determine the projects that get added to the list.</p>
86	Email	8/24/24	Christina Maginnis	<p>2.1 City/County/LWWSD – Formalize a collaborative process on 6 year capital improvement plans where are projects planned / getting built nearby LWWSD pipeline improvement projects – could share mobilization costs and better coordinate work adjacent to one another. Similar to “Dig once” efforts for PW project planning.</p>	Stormwater Management	S	<p>Regular coordination on projects between the jurisdictions occurs already.</p>
87	Email	8/24/24	Christina Maginnis	<p>2.1 ADD more small scale runoff re-route projects to get treatment for more lots not otherwise connected to stormwater system.</p>	Stormwater Management	S	<p>In City limits, improvements on private property are addressed through the City’s Homeowner Incentive Program (HIP). HIP reimburses owners that install drainage improvements that could collect and route stormwater from private property into publicly owned stormwater treatment BMPs.</p> <p>The County has the Neighborhood Native Landscaping Program to address small-scale private property improvements in unincorporated areas.</p>
88	Email	8/24/24	Christina Maginnis	<p>2.1 ADD: County add more built stormwater system to treat stormwater away from direct creek or shoreline discharge from developed properties.</p>	Stormwater Management	S	<p>The placement of stormwater treatment projects is already selected based on several criteria, including proximity of discharge water bodies. Comment is noted, and current task will remain as written.</p>



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89	Email	8/24/24	Christina Maginnis	<p>2.1 ADD the following actions back to Stormwater Management section of work plan. These were in the 2020-2024 work plan and need to continue in order to meet the Lake Whatcom TMDL implementation plan:</p> <ul style="list-style-type: none"> -Complete an evaluation of the effectiveness of built stormwater treatment and flow control facilities, and an assessment of overall performance in reducing phosphorus and bacteria (TMDL REQUIRED). - Develop retrofit plans for existing facilities and program projects for design and construction in accordance with resources, budget, and need (TMDL REQUIRED). - County will complete two subwatershed master plans to identify specific strategies for target areas. - Update capital improvement project list annually (TMDL REQUIRED). 	Stormwater Management	S	<p>The City and County are currently implementing its second study/project to evaluate the effectiveness of publicly owned and operated stormwater treatment BMPs in the Lake Whatcom watershed.</p> <p>The City and County have capital stormwater facility retrofit matrices and plans. This plan has been in place for many years and has been used to identify and prioritize water quality facility retrofitting.</p> <p>The City and County reviews and updates our capital stormwater facility retrofit matrix/plan as new information/data is available. Items considered in the retrofit tool/plan include cost of retrofit, phosphorus removal efficiency, lifetime maintenance costs, and new technologies/BMPs.</p> <p>The County has ongoing efforts for each of the three bullet points in the comment. Each is included in the next biennial budget. "TMDL Required" refers to the specific language in the previous NPDES phase II Permit, Appendix 2 that "required" these actions. The actions are still taking place, but Ecology does not require very specific actions as a regulatory hammer. Rather, the comprehensive reporting of the efforts of the City and County are communicated to Ecology review for progress towards meeting the TMDL.</p>
90	Email	8/24/24	Mt Baker Group-Sierra Club	<p>The "Residential Stormwater Solutions" section is couched entirely in terms of encouraging, assisting, or supporting, which leaves it entirely up to residents to participate or not.</p> <p>Why not require these solutions or provide financial incentives? How does leaving it up to the residents and hoping for the best "prioritize protection over treatment," which is one of the Program Goals?</p>	Stormwater Management	P, S	<p>There is currently no legal mechanism to require existing homeowners to install these improvements unless they are redeveloping (remodeling or expanding) their property. Voluntary efforts are encouraged and financial incentives are provided through the Homeowner Incentive Program and Neighborhood Native Landscape Program.</p>
91	Email	8/25/24	Whatcom Environmental Council	<p>Section 2.2 on Residential Stormwater Solutions relies heavily on education, encouragement, incentives, and voluntary actions. Information should be added to this section to describe whether voluntary actions are making sufficient progress, and what the threshold points are being monitored for a decision to start ramping up over time a more regulatory approach in addition to the education, encouragement and incentives.</p>	Stormwater Management	S	<p>The Lake Whatcom annual progress reports include phosphorus reduction estimates for the City's Homeowner Incentive Program (HIP). The City has evaluated the TMDL waste load allocation, capital project efficiency, and improvements on private property. This analysis has provided results indicating the City can likely meet its waste load allocation without voluntary improvements on private property. Also, over time, in the City, new- and redevelopment and substantial remodel projects will trigger development regulations requiring stormwater management and phosphorus removal/mitigation.</p> <p>Whatcom County has similarly estimated phosphorus reductions from HIP projects. By the end of 2024 the County's HIP program will be ending. The Neighborhood Native Landscaping Program (NNLP) will be the primary voluntary residential stormwater program in place. Staff will track the square footage of native landscaping installation, and the program will evaluate targets annually.</p>



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92	Email	8/23/24	RE Sources	<p>2.2 Recommendation: The strategies listed above lack measurable outcomes. The plan should include more context for activities related to these strategies. For example, how many homeowners do jurisdictions aim to contact annually? How many of these contacts are passive (homeowner initiated) vs active (staff-initiated) outreach? Is there an outreach plan guiding the engagement of homeowners, and if so, is it updated annually to reflect best practices for achieving outreach goals?</p> <p>Rationale: We need to know if adequate progress is being made through voluntary/passive outreach efforts. If this approach is not effective enough, the LWMP may need to supplement voluntary programs like HIP with more punitive measures and enforcement in order to increase compliance; for example, stormwater fees for residents could be assessed not only by square footage but on factors like total pervious surface area or quality of pervious surfaces.</p>	Stormwater Management, Education & Engagement	S	<p>Though not reported in the work plan or annual progress reports, the City's agreement with the Whatcom Conservation District for the co-management and implementation of the City's Homeowner Incentive Program (HIP) includes contract deliverables that include a goal for the number of annual household contacts. We use various strategies, including both passive and active outreach. The City's agreement with the Whatcom Conservation District is renewed annually and with each modified agreement, new goals are set.</p> <p>Whatcom County also works with the Whatcom Conservation District for co-management and implementation of HIP. All County HIP projects will be completed by the end of 2024 as the program is being phased out and the Native Neighborhood Landscaping Program (NNLP) will be the primary voluntary residential stormwater program in place. Staff will track the square footage of native landscaping installation, and the program will evaluate targets annually. We have over 100 residents on the wait list for NNLP, so outreach is not currently an issue.</p>
93	Email	8/25/24	Silver Beach Neighborhood Association	In 2002-2003, when the Total Maximum Daily Loading was developed, the Department of Ecology determined the watershed could tolerate 2-3% development and still effectively filter the lake to remove the required pounds of phosphorous. In 2002-2003, 12% of the watershed had already been developed. We were already over the DOE standard to meet the TMDL. Development has not stopped over the past 20 years. 31 new homes were built in 2023. Homes on Lake Whatcom's waterfront have no stormwater retrofitting unless they voluntarily use the HIP program.	Stormwater Management	S	See comment # 122
94	Engage Bellingham	8/19/2024	Rick Eggerth	"Providing residential retrofit programs to reduce phosphorus pollution from existing developed lots." What are these programs?	Stormwater Management	S	Currently, it's the Homeowner Incentive Program (HIP) within city limits and the Neighborhood Native Landscaping Program outside city limits.
95	Email	8/25/24	Silver Beach Neighborhood Association	Stormwater retrofitting does not include waterfront homes, multi-family parcels, parcels along creeks, etc., and the amount of stormwater that drains into these Lake Whatcom from these sources is not measured.	Stormwater Management	S	<p>Stormwater retrofits, both voluntary and required by development regulations, apply to all properties within the Lake Whatcom watershed. The City's Homeowner Incentive Program (HIP) offers larger financial reimbursement if a property directly discharges stormwater to a creek or Lake Whatcom.</p> <p>Neither jurisdiction has the authority to take over a private property to retrofit regardless of where the parcel is located, or what zoning it is.</p>



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96	Email	8/24/24	Christina Maginnis	2.2 Consider adding specific SW restoration manager for rain garden maintenance of native plants as typical PW ops staff do not have this training (possible Americorps crew?) or ADD training for specialized PW maintenance crew to do this work consistently across watershed.	Stormwater Management	P, S	<p>City stormwater operations and maintenance crews are well trained and regularly perform inspections and maintenance on raingardens (bioretention) as well as all other Ecology approved water quality treatment BMPs. In addition, in the City, each stormwater capital facility that is constructed is required to have an operations and maintenance manual, prepared by the designing engineer, outlining inspection and maintenance frequency and requirements.</p> <p>County staff working on rain garden maintenance either have the appropriate training, or a contractor with that training is hired to perform the duty.</p>
97	Email	8/24/24	Christina Maginnis	2.2 ADD: Conduct annual private stormwater facility maintenance workshops to instruct owners about system needs and maintenance requirements (TMDL REQUIRED).	Stormwater Management	S	<p>As part of development application requirements, within the City, operations and maintenance plans are required to be created and retained by the property owner. The City also requires maintenance agreements for Homeowner Incentive Program projects. The City is available to assist BMP owners understand their stormwater treatment BMP(s) and operation and maintenance requirements. The City also supports BMP owners by connecting them with information and resources to help them with BMP management.</p> <p>In the County, annual private stormwater facility maintenance workshops have been modified to provide specific one-on-one technical assistance to HOAs, as well as extensive online resources. County staff have continual engagement with HOAs throughout each year.</p>
98	Email	8/24/24	Christina Maginnis	<p>2.2 City HIP maintenance agreement starts at 120sq ft. has incentive and is in code. Match this in County Code.</p> <p>After 5 years consider, eliminating this incentive program and make it condition at time of property sale for lots connected to stormwater system. Must bring property up to current stormwater code, similar to onsite septic needing to pass inspection at time of sale.</p> <p>Incentive continues another 5 years for shoreline lots, creekside lots with direct stormwater discharge, and larger lots which bypass the stormwater system.</p>	Stormwater Management	P	<p>The City has had review from our Legal Department regarding requiring stormwater water quality retrofits on private property. In the simplest of terms, the City cannot require improvements on private property without some sort of trigger. The trigger, in the City, is the requirement for a building permit. Also, most homes located within the City's portion of the Lake Whatcom watershed are connected to the City's stormwater system. The City annually evaluates their Homeowner Incentive Program (HIP) and has made program changes to increase HIP participation. Based on current analysis and participation progress on meeting the City's waste load allocation does not warrant greater requirements, particularly with the legal hurdles that have been identified.</p>
99	Email	8/25/24	Whatcom Environmental Council	Page 22, first paragraph; Insert "Avoid clearcut of parcels that qualify for subdivision" at end of Section 2.2.3.	Stormwater Management	S	<p>Section 2.2.3 is about voluntary residential programs, so the proposed addition does not apply to this section.</p>
100	Engage Bellingham	8/25/2024	Peter Englander	More awareness at sewer grates. More education at stormwater facilities - tell us how these facilities work with placards! The new one on Austin also seems like it was supposed to have additional	Stormwater	S	<p>The City considers outreach signage at their stormwater water quality BMPs at the time of design and construction. Due to public safety concerns, limited sidewalk access, and no available parking, outreach signs are not</p>



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				vegetation as after the large rain the past season seems to have washed out some of the construction.			generally included. Bloedel Donovan Park has stormwater BMP outreach signs that are updated periodically. Some County stormwater treatment facilities do have educational signs, and staff can evaluate if others may be good candidates for them. The Geneva Retrofit Project on Austin was just completed this year and is being monitored regularly for vegetation and erosion.	
101	Engage Bellingham	8/5/24	Jim Hansen	Emphasis should be on natural infiltration methods over retention ponds should be strongly incentivized. In general, COB is pretty adequate. Basin 1 infill should be done with minimal canopy reduction.	Stormwater Management	S	Stormwater management requirements applicable to the Lake Whatcom watershed and found in statewide guidance manuals already prioritize natural infiltration. Infiltrating stormwater is encouraged and supported on public and private projects, big and small. In Basin 1 of the watershed, the City's Lake Whatcom Development Chapter (Bellingham Municipal Code 16.80) describes the requirements for tree protection and retention when properties are developed. The City of Bellingham has recently converted most of our publicly owned retention ponds in the Lake Whatcom watershed into facilities that utilize similar processes to protect water quality. Where infiltration is not feasible, the City installs treatment systems aimed at reducing nutrients. In Basin 1 of the watershed, current development codes describe the requirements for tree protection and retention when properties are developed. The intent of the code is to require forested conservation easements on every property, along with engineered stormwater treatment or infiltration systems.	
102	Engage Bellingham	7/29/24	JHR	Do incentivize native plantings, like willow, along shore by residents.	Stormwater Management	S	The City has the Homeowner Incentive Program that provides financial reimbursement for the removal of invasive species and the replacement with native plants. The County has the Neighborhood Native Landscaping Program (NNLP) that encourages homeowners to convert their lawns into native landscapes. They are provided with planting plans, permitting, materials (native plants and mulch), and installation assistance, free of charge. During a fall planting party, residents work with their neighbors and staff to get their projects in the ground.	
103	Email	8/24/24	Whatcom Million Trees Project	We suggest adding the following new statement to section 2.2 Residential Stormwater Solutions that provides an actionable component to address invasive English ivy which is completely overlooked in this draft report but has major impacts on the tree canopy and understory around Lake Whatcom, directly impacting stormwater buffering and filtering: "Starting in year 2025 provide	Stormwater Management	S	English ivy is not a stormwater challenge and is not part of the LWMP's TMDL response as it does not influence phosphorus and/or bacteria transport to Lake Whatcom. The Homeowner Incentive Program and Neighborhood Native Landscaping Program provide outreach related to invasive species, including English ivy, and can provide financial reimbursement for the removal of invasive plants and the replanting with native plant species. Furthermore, English ivy will be addressed as part of	



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				<p>ongoing education and support for residents to remove English ivy on and around their trees.”</p> <p>Reporting metrics:</p> <ul style="list-style-type: none"> • Outreach/educational efforts implemented • Number of homeowners participating in ivy removal program • Number of trees in private parcels that are cleared of ivy • Estimate # of trees still impacted by ivy • Cubic yards of ivy cuttings removed <p>Discussion:</p> <p>WMTP has been tracking the prevalence of English ivy on trees in Bellingham and the County. English ivy eventually kills virtually every tree it climbs onto. (Click here to learn more about this threat and WMTP's multiple responses to mitigate it. - https://whatcommilliontrees.org/tree-projects/tree-protection/english-ivy/) On private parcels in the watershed, English ivy is killing hundreds of trees collectively in the yards of homes on all sides of the lake, close to the shoreline as well as further back from the Lake's edge. This reduces valuable tree canopy and the understory's biodiversity. Both impact the natural water filtering capability of the watershed. Ways that watershed residents can be educated and supported include ivy-focused educational flyers/mailers, a dedicated webpage, occasional webinars/trainings, and ivy cuttings disposal assistance.</p>			the forest management plan process discussed in the Forest Management program area.	
104	Engage Bellingham	8/19/2024	Rick Eggerth	<p>The draft also mentions that phosphorous loading is reduced by, among other things: “Constructing, operating, and maintaining stormwater treatment facilities.” Are these facilities all up to current standards, and do they treat all stormwater? If not, why not? And what will it take to treat all stormwater?</p>	Stormwater Management	S	<p>All stormwater water quality BMPs within the City and County have been approved by Department of Ecology for phosphorus treatment. Water quality facilities are engineered and sized for the volume of stormwater that is drained to it. Some properties drain stormwater directly to creeks and the lake and are not able to be collected and routed to a City or County owned and operated water quality BMP. For these properties, the City’s Homeowner Incentive Program can provide financial reimbursement for onsite stormwater treatment before it is discharged from the property. The County will utilize Neighborhood Native Landscaping Program where applicable.</p>	
105	Engage Bellingham	8/25/2024	KerriB	<p>Please add a plan with a target date for completion for the unmitigated storm drains from the multi-family parcels within the Silver Beach Neighborhood.</p>	Stormwater		<p>The City is restricted from providing public funds for private improvements without a clear nexus for addressing an issue as well as requiring site improvements without a legally supported trigger, such as a building permit. The City’s Homeowner Incentive Program is available for multifamily properties within City limits.</p>	



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106	Email	8/24/24	Christina Maginnis	<p>2.3 Additional GIS review for public stormwater system to improve stormwater program for County – Complete County land assessment – How many miles of ditch / drainage area acres flow into Lake untreated? What inspections are done to ensure MS4 outside of Phase II meeting WQ standards and County codes?</p> <p>ADD: As part of County Stormwater design review add treated acres calculations for each new or redevelopment permit per sw design report for each site plan. This will help County determine Phosphorus and lbs/year removed.</p>	Stormwater Management	S	<p>Much of that information is already part of County programs, and staff will develop new measures and data to present at for the next progress report.</p>
107	Email	8/24/24	Mt Baker Group-Sierra Club	<p>The “Public Stormwater Facilities and Infrastructure” section 2.3.2 requires completion of an evaluation of the effectiveness of Operations and Maintenance procedures for stormwater flow control and treatment facilities and development of a list of recommended improvements to O&M practices and procedures to increase phosphorus and bacteria reductions.</p> <p>Another list is mentioned in the next section, 2.3.3 “of recommended best practices for public land management for phosphorus and bacteria control.”</p> <p>Who is responsible for the creation of these lists and implementing and monitoring the recommended measures?</p>	Stormwater Management	S	<p>The City of Bellingham is under contract with a consultant to study this issue and produce the lists within the next five-year work plan. This is under a study named the Phosphorus and Bacteria Optimized Operations and Maintenance (PBOOM) study. PBOOM is fully funded and has state grant support. As a result, we will be creating an Enhanced Maintenance Plan (EMP) that increases the ability for the City to manage both bacteria and nutrients in our public spaces with better effectiveness and efficiency.</p> <p>The City of Bellingham and Whatcom County both monitor the performance of these activities and report out on their implementation in our annual reports.</p> <p>Whatcom County Public Works Stormwater Division is responsible for these lists and programs. Noted to have additional information on the County website on these topics.</p>
108	Email	8/23/24	RE Sources	<p>2.3.2 Suggested language: “Complete an evaluation of the effectiveness of built stormwater treatment and flow control facilities and report specific findings each year to the Lake Whatcom Policy Group with a specific plan to address any shortfalls in their overall performance.”</p> <p>Rationale: The plan as written does not include a clear plan for incorporating evaluation results into future management decisions. For example, both the 2017 and 2022 OSS leachate detection reports indicate that on site septic on Lake Whatcom’s North shore are leaking sewage into the lake. What has been done to address the issue since the study data revealed the issue to LWMP? How is progress assessed for the work being done to address it?</p>	Stormwater Management	S	<p>Continuous performance monitoring of water quality treatment BMPs is an unnecessary use of limited resources as loading and performance of a BMP does not substantially change over time. The City is currently doing a project where they will be monitoring the phosphorus and bacterial loading into representative BMPs. The project will evaluate the removal performance of the BMPs for phosphorus and bacteria. Data and BMP performance will be shared with Whatcom County. Data from the project will also be used to develop enhanced maintenance plans that will help guide maintenance practices to have the optimal removal of phosphorus and bacteria from the BMP. The data will also be used in the City’s capital water quality facility retrofit matrix and plan to help with planning for future water quality facility retrofits.</p> <p>The results of the 2020 Water Quality Monitoring Report: Lake Whatcom On-Site Sewage System Impact Assessment were inconclusive regarding impacts from OSS on lake water quality. Follow-up investigation by the Whatcom County Health Department did not reveal any systems leaking into</p>



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							the lake. The report recommended some next steps which are being implemented. This should provide more clarity on potential impacts.	
109	Email	8/24/24	Christina Maginnis	<p>2.3 ADD: County – Stormwater private facility inspection program Current code requirement of “self reported annual inspection reports” since 2016 for treatment and flow control facilities lacks accountability that program is following codes and facilities are performing and maintained, as designed.</p> <p>ADD: County sampling and measuring performance over time of private systems- currently not doing this critical step.</p> <p>ADD- Time of sale private stormwater inspections for private filter vaults and other engineered stormwater treatment - needs to be on title of lot, in addition to larger stormwater flow control and treatment facilities. Currently only inspected at time of installation. No follow up inspections are required.</p>	Stormwater Management	P	<p>The BMPs used in engineered systems that are approved for single family homes do not have the capacity to be monitored and maintained as do the larger public systems. They are often in the ground. If a system is not functioning properly, signs and damage would occur within view and be assessed to be fixed.</p> <p>Approved stormwater systems are already included on the title of the property.</p>	
110	Engage Bellingham	8/5/24	Jim Hansen	Also, it is important that the road ditch runoff be thoroughly cleaned before discharge into the lake. Added permit charges can offset city and county expenses to provide this.	Stormwater Management	P, S	<p>Within the City of Bellingham, nearly all stormwater runoff that flows through City-owned ditches is treated to the maximum extent practicable.</p> <p>The City of Bellingham and Whatcom County have dedicated funding to complete these actions so an increase in permit fees to fund this work does not appear necessary at this time.</p> <p>Both the City and County comply with NPDES permits and always look for cost-effective opportunities to reduce stormwater effluent.</p>	
111	Email	8/25/24	Whatcom Environmental Council	Page 23, Section 2.4.2; insert “and quantity: after water quality.”	Stormwater Management	S	The Lake Whatcom management plan and TMDL is based on water quality criteria and requirements and not water quantity.	
112	Email	8/24/24	Christina Maginnis	<p>Sample every outfall to the Lake – City does this for 26 outfalls. County does not. County to identify all outfalls, and start by sampling ones in Phase II permit area.</p> <p>County needs to assess and provide treatment at every outfall to the lake over set timeline. City already does this for 100% of outfalls to Lake Whatcom.</p>	Stormwater Management		The County has identified all outfalls into Lake Whatcom, with a majority of them in private ownership. The County continues to assess all sampling and monitoring needs in the watershed.	
113	Email	8/24/24	Christina Maginnis	<p>Reporting Metrics:</p> <p>ADD all the action outcomes in sections 2.1,2.2,2.3 and 2.4 for each year.</p>	Stormwater Management	S	The City and County track and report both effective developed acres and lbs. phosphors/year.	



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				ADD to reporting metrics: Develop metrics for phosphorus reductions for mass per unit time (Lbs P/yr).				
114	Email	8/23/24	RE Sources	<p>Reporting Metrics</p> <p>Looking at the 2023 reporting metrics for stormwater, it is not possible to decipher what the County’s success was in eliminating phosphorus within their jurisdiction uniquely.</p> <p>Recommendation: The next progress reports should include distinct data for each jurisdiction in addition to aggregate results.</p>	Stormwater Management	S	The intention of the progress reports is to collectively report on all work completed by the three jurisdictions. For information on specific metrics for an entity, please contact that specific entity.	
115	Email	8/23/24	RE Sources	<p>Reporting Metrics</p> <p>It is also unclear from the current draft whether Bellingham and/or Whatcom County conduct post-construction reviews to ensure that properties meet landscaping requirements to prevent runoff into the lake, say two, five, and ten years after construction.</p>	Stormwater Management	S, P	<p>City development regulations require both inspections during construction and when the project is completed (final inspection). These inspections include any required BMPs, native landscaping, and any other requirement of the development permits. Part of the City’s development regulations for the Lake Whatcom watershed include native planting areas called Native Vegetation Protection Areas (NVPA) and monitoring requirements are stated in Bellingham Municipal Code 16.80.085</p> <p>Whatcom County Code does not require continued post construction reviews on stormwater treatment landscaping in perpetuity. Comment forwarded to Lake Whatcom Policy Group.</p>	Section 3.1.3 : Added link to Bellingham Municipal Code 16.80.085 for specifics.
116	Engage Bellingham	8/18/2024	lbw	<p>The County’s rules covering residential stormwater facilities for new development are less stringent than the City’s. Since most of the development in the watershed going forward will be in the County portion of the watershed, there should be an effort to ensure that the County’s rules are as strong as the City’s rules. Meanwhile, the County’s system for tracking efforts to reduce phosphorus pollution are clearly inadequate. For example, the Lake Whatcom Management Program Reporting Metrics released each year in the annual progress report includes estimates for “pounds of phosphorus reduced per year through land use regulations” for the City, but not for the County. Likewise, the City reports “acres of developed surface treated by phosphorus-limiting BMPs installed to meet requirements of land use regulations,” but the County has no data on this. Lastly, there is a significant gap in the system in the County’s approach to residential stormwater facilities. Once a home is developed, the County does a final inspection and signs off on the system. The rules dictate that the homeowner is responsible for periodically inspecting the system and for its proper maintenance, but there is no system for checking if the facility is still working as designed over time.</p>	Stormwater Management	P	<p>The County is working on a mechanism to track phosphorus reduction through land use regulations that will be presented in the next progress report.</p> <p>The County does conduct a final inspection of the installed stormwater BMPs required by the development permit. The adopted code does not require the County to periodically inspect, it is the homeowner’s responsibility and is included in the properties declaration of covenants that are part of the deed to the property. To change the requirement from the homeowner to the County requires a code change and policy discussion with the Whatcom County Council.</p>	



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117	Email	8/24/24	Christina Maginnis	County needs to add measurable outcomes on their own for TMDL reporting similar to City. County Council would introduce this as a code update to land use codes for Lake Whatcom. TMDL requirements in 2024 NPDES Phase II Stormwater permit are limited. Not equivalent as what was in 2019-2024 NPDES Phase II MS4 permit. City and County should commit to meeting all previous TMDL requirements listed in Lake Whatcom Management Program work plan from 2020-2024.	Stormwater Management	P	Comment forwarded to Lake Whatcom Policy Group	
118	Engage Bellingham	8/19/2024	Rick Eggerth	The draft also mentions that “city and county are required to make continued progress toward TMDL targets.” Are these targets being met? If not, why is that? And again, if not, what’s being done to meet those targets?	Stormwater Management	S	This statement from the draft work plan is about the NPDES permit. The City and County report to the Department of Ecology annually on their NPDES Permit which includes a report out on tasks required in Appendix 2: Total Maximum Daily Load for Lake Whatcom. The City and County also provide updates on all other Lake Whatcom related efforts to Ecology through the 5-year work plan progress reports. Overall phosphorus reduction targets were established through the TMDL, and Ecology works closely with each jurisdiction to evaluate and track the progress made annually through the NPDES Permit and the 5-year work plan.	Added more information about the NPDES permits and links in the Management Challenges section of the work plan.
119	Engage Bellingham	8/5/24	Jim Hansen	Also, the standard here should be net gain in water quality and infiltration rather than "no net loss", a standard that has proven to be ineffective.	Stormwater Management	S	No net loss is not mentioned in this work plan. Work to improve water quality is for net gain.	
120	Email	8/24/24	Christina Maginnis	3.1 Development “Codes” - Add “Codes” to title of this section to clarify all actions are related to development codes governing how land is developed.	Land Use	S	Staff believe that the current language is more appropriate.	
121	Email	8/24/24	Mt Baker Group-Sierra Club	Section 3.1.5 requires the LWM Partners to “[e]valuate the effectiveness of changes to development regulations to preserve and restore land that might otherwise be” developed or harm fish and wildlife habitat. What is the evaluation process and what regulations are being targeted? How will these evaluations impact future land use regulations?	Land Use	S	In both Whatcom County and the City of Bellingham, the Critical Area and Shoreline codes are reviewed every 10 years through state law, with oversight from Washington Department of Ecology. Changes to the codes require evaluation of ‘Best Available Science’ to modernize development regulations. Land development clearing and grading codes in both the City and County update as needed to collaborate with other code chapters and modernize development regulations. Policy considerations may be brought up for discussion by the Lake Whatcom Policy Group.	
122	Email	7/29/24	Eric Hirst	The plan does not even consider tougher regulations that would require property owners to modify landscaping to prevent runoff. Such regulations might be needed to supplement voluntary programs, such as HIP.	Land Use	P	The City and County have robust codes and regulations in place that kick in when properties are developed or redeveloped. These regulations require significant protections for water quality and long-term preservation of vegetated or forested areas. For new construction, and significant rebuilds, existing land use regulations specific to the Lake Whatcom watershed	



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							(Bellingham: BMC 16.80 and 15.42. Whatcom County: WCC 20.51 and WCC 20.71) are in force. For existing parcels in the watershed, robust incentive programs exist that provide both technical assistance and financial reimbursement for voluntary improvements that make properties more lake-friendly. LWMP partners are aware that voluntary programs are necessarily limited by their voluntary nature. Currently, we do not have the ability to require existing property owners to construct improvements to meet current regulations for new or redeveloped properties.	
123	Email	7/29/24	Eric Hirst	It is also unclear from the current draft whether Bellingham and/or Whatcom County conduct post-construction reviews to ensure that properties meet landscaping requirements to prevent runoff into the lake, say two, five, and ten years after construction.	Land Use	S	Details on post-construction review requirements are found in Bellingham Municipal Code 16.80 and Whatcom County Code 20.51	Added links to BMC 16.80 and WCC 20.51
124	Email	7/29/24	Eric Hirst	The plan offers no data on the progress to date in cleaning and protecting Lake Whatcom water quality and how much remains to be done. The plan includes a section on Reporting Metrics but provides no data. Here are some annual data that I think the Coordinating Team should include in the final 5-year plan: • Housing starts, by location (Bellingham and Whatcom County jurisdictions)	Land Use	S	The LWMP does not have a metric explicitly called “housing starts” but the number of new permits issued, and other similar data is available for review.	
125	Engage Bellingham	7/28/2024	Holly	Hmm. I don't see any requirements here. Lots of talk about reporting but nothing about what the developer needs to do. I suppose that's in some other regulations, but it would be helpful to link to it to know what the goals are for this program area.	Land Use	S	Links to the City and County regulations that apply were added to the section.	Added “including Bellingham Municipal Code 16.80 and Whatcom County Code 20.51 ” to Section 3.1.
126	Engage Bellingham	7/30/2024	Randall, P	There is no proposed restriction of building new housing around the lake.	Land Use	P	The ability to prohibit development outright is not within the LWMP’s authority, for legal reasons based in state law and property rights. Instead, our ability to address development’s impact to the lake water quality is found in each LWMP jurisdictions’ development regulations.	
127	Engage Bellingham	7/28/2024	Ebross1942@icloud.com	No more houses on Lake Whatcom. No development.	Land Use	P	Development in the Lake Whatcom watershed is subject to some of the most restrictive and limiting requirements in local development code. Developing land in the watershed necessitates the input of many professionals and results in construction costs that can be significantly higher than similar projects elsewhere. The code requirements and restrictive rules dictate that the new (or re-) development does not discharge excess runoff or phosphorus to the Lake. From the perspective of water quality, developed land should perform the same as a forest of the same size, in terms of runoff volumes or nutrient discharge. In addition to limiting new development by code, the City of Bellingham purchases undeveloped property through the Land Acquisition Program,	



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							part of the Land Preservation program area. Some lots are acquired with existing development that is removed and replaced with forest. This is a direct way that LWMP funds are used to prevent and even reduce development in a permanent, durable, and legally supported way.	
128	Engage Bellingham	7/30/24	Randall, P	There have been multiple public meetings at which the public has vigorously asked for action on the items just identified, but have been met with silence, delay and a new City Council policy of negotiating new construction projects in Silver Beach with the individual developers rather than embrace a zero growth policy in the watershed.	Land Use	P	The recent decisions by the Bellingham City Council and the Bellingham Planning Commission have resulted in a down-zone of multifamily areas from high to low density and implementation of new stormwater requirements for multi-family development. The new rules require new or redeveloped multifamily developments to comply with the same stringent stormwater rules and requirements that are already in place for single-family lots. These rules set the stage for a future where multifamily property owners must comply with these very protective stormwater management regulations, creating better water quality as a result.	
129	Engage Bellingham	7/29/24	JHR	The housing issue is difficult but since our area is growing, and we face drought and water shortage/pollution into the future, allow no more housing developments in hills around lake. Instead build up dense housing in areas that impact watershed less.	Land Use	P	See comment #126.	
130	Engage Bellingham	7/29/24	Northshore Resident	The watershed should be re-zoned as low density to help ensure that the damage caused by lawns and pets and people is not increased.	Land Use	P	Of undeveloped land within the watershed that is zoned for development (e.g., not zoned Commercial Forestry, Rural Forestry, Community Open Space, etc.), the zoning is predominantly R5A (Rural with no more than one residential unit allowed per 5 acres). The Lake Whatcom Watershed Overlay (Whatcom County Code Chapter 20.51) further limits development allowances within the watershed that are allowed elsewhere in the County. The multi-family zones in the city limits were recently downzoned to “low” density. There are nine single family zones; six are zoned low density and three are zoned medium density.	
131	Engage Bellingham	8/5/24	Jim Hansen	The big challenge is for Basins 2 and 3 where great development potential remains due to poison pill lots grandfathered in at unacceptable densities. We need to preserve the forestry and rural forestry zones and see if we can change the R5A zones to R10A when possible. The permitting conditions and mitigations for impervious surface, canopy reduction and storm water treatment should be so strong that any development is net gain of environmental function since "no net loss" has only resulted in dramatic losses.	Land Use	P		
132	Email	8/23/24	RE Sources	3.1.1 Suggested Language: “Analyze any discrepancies between city and county land use regulations and recommend new rules to create alignment between the jurisdictions. Moving forward, coordinate with Lake Whatcom partners when developing or revising development regulations.” Rationale: The plan as written does not include a clear plan for taking action on known discrepancies.	Land Use	P	Comment forwarded to Lake Whatcom Policy Group for consideration.	
133	Email	8/25/24	Whatcom Environmental Council	Section 3.1 talks about providing consistency with land use goals, policies and development regulations, yet there is no discussion about whether consistency of efforts between the various jurisdictions currently exists. Please describe how goals, policies and regulations between jurisdictions align or don’t.	Land Use	S	Land Use within Critical Areas and Shoreline zones are consistent and aligned between City and County codes. Department of Ecology reviews these codes prior to adoption for consistency with State guidelines. The 2021 Uniform Building Code was adopted by both the City and the County in 2024.	



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134	Email	8/24/24	Christina Maginnis	3.1.1 Update land use codes in County - Remove lawn exemption in County up to 500sq ft. - Follow City of Bellingham Code for Impervious and partially pervious surfaces (LAWN) on residential lots	Land Use	P	The closest requirement that Whatcom County Code has to the Bellingham Municipal Code to which you refer is that a Phosphorus-neutral stormwater design is required if a project proposes land disturbance of more than 5,000 sq. ft. Generally, we look at this as addition/replacement of any types of surfaces that are not considered hard surface. A 500 sq. ft. threshold was proposed in 2022 amendments to WCC Chapter 51, the Lake Whatcom Watershed Overlay District. However, the Whatcom County Council determined that a threshold of 500 sq. ft. of earthwork was too low, and kept it at 5,000 sq. ft. A code change would require County Council approval.
135	Email	8/24/24	Christina Maginnis	3.1.1 Update land use code in County to require Sudden Valley SW manual from 2016 to match Silver Beach ordinance requirements for development, since both are small lot urban level of development Provide exception to “minimum building footprint of 1400sq ft” and requirement for garages in Sudden Valley	Land Use	P	Whatcom County Code currently requires a phosphorus-limiting stormwater plan for projects that add more than 200 sq. ft. of hard surface, similar to the City of Bellingham’s requirements. This corresponds with the building codes for requiring a building permit. It is unclear what the “1,400 sq. ft.” is in reference to. If it is a Sudden Valley Community Association (SVCA) requirement, SVCA would need to alter their Covenants, Conditions, and Restrictions.
136	Email	8/24/24	Christina Maginnis	3.1.1 Update County land use code to eliminate the exemption, which provides a threshold of 5000 sq ft for erosion control for “partially pervious” areas. It misses Phosphorus treatment for lots that remove trees and do not develop immediately.	Land Use	P	A 500 sq. ft. threshold was proposed in 2022 amendments to WCC Chapter 51, the Lake Whatcom Watershed Overlay District. However, the Whatcom County Council determined that a threshold of 500 sq. ft. of earthwork was too low, and kept it at 5,000 sq. ft. A code change would require County Council approval.
137	Engage Bellingham	8/25/2024	Peter Englander	OUTLAW LAWNS AT ALL NEW DEVELOPMENT!	Land Use	P	See comment # 134
138	Engage Bellingham	8/25/2024	Kerri B	Please add a requirement for a behavior analysis study to project the impact from increased human activity. This can be used when making decisions on what level of density is allowed to be developed in the watershed.	Land Use	P, S	LWMP follows guidance from Department of Ecology to develop behavior change programs. Additionally, we utilize the 5-year survey to reevaluate behavior and perceptions of the watershed and adapt our programming accordingly.
139	Engage Bellingham	8/5/24	Jim Hansen	In Basins 2 and 3 there should be even stronger protection for forest canopy and storm water. Requirements in this regard should be so strong as to inhibit development of vested lots. This will not be a space for affordable housing anyway.	Land Use	P	In 2022, Whatcom County passed stronger tree canopy retention standards (in coordination with the Whatcom Million Trees Project and RE Sources), which also limited large tree clearing for development on larger lots. Inhibiting development on legal (vested) lots could be considered a “taking”, which is not legal without just compensation.
140	Email	8/24/24	Whatcom Million	We suggest adding the following new statement to section 3.1 Development: “By end of year 2025, assess and present possible	Land Use	P	The City’s Urban Forest Plan & Clearing Grading Ordinance upcoming in 2025/26.



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			Trees Project	<p>regulatory changes that can reduce illegal tree removals within the Lake Whatcom watershed.”</p> <p>Discussion:</p> <p>'Shadow' unauthorized tree removals occur within Lake Whatcom Watershed, adding up to significant canopy loss over time that potentially impacts the Lake's water quality and contaminant natural filtering capability. Such tree removals are occurring even with the improved tree retention provisions in the updated Lake District Overlay Ordinances that WMTP and ReSources helped Whatcom County to develop and pass during 2023. The problem is largely because enforcement is difficult, understaffed, and often too late since some tree service providers act deliberately "under the radar" of required permit processing. Landowner awareness about tree removal rules in the watershed is also minimal.</p> <p>To reduce this problem, we believe the LWMP Work Plan should include an evaluation of options that other public agencies have used, which include:</p> <p>a) Requiring tree service providers (arborists, landscapers, tree removal companies, etc.) wishing to practice within the watershed to register at low-cost.</p> <p>b) Increasing the fines of providers who illegally remove trees. (Such fines can help to pay for watershed canopy education/permitting/enforcement.)</p> <p>c) For repeated violations, revoking the provider's license to work on trees in the watershed. This potential step is essential to the success all of the above.</p>			Regulatory changes that can reduce illegal tree removals is a policy decision. Comment forwarded to Lake Whatcom Policy Group for consideration.	
141	Email	8/24/24	Whatcom Million Trees Project	<p>We suggest adding the following new statement to section 3.1 Development: “By end of year 2025, establish new requirements for longer, more visible postings of tree removal permits within the watershed.”</p> <p>Discussion:</p> <p>Reliance on citizen complaints of illegal tree removal in the watershed rarely is effective. People only notice trees being cut down when they hear the chain saw or realize the tree is missing after the fact. That's too late! Even when valid permits exist for the tree removal, currently they are usually not displayed in publicly visible locations (i.e. streetside). This makes prevention, tracking and enforcement of illegal</p>	Land Use	P	<p>The City’s Urban Forest Plan & Clearing Grading Ordinance upcoming in 2025.</p> <p>Posting is not required for Type I permits in State or County codes. Further discussion with applicable departments and staff would be warranted. Comment forwarded to Lake Whatcom Policy Group for consideration.</p>	



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				removals ineffective. Many jurisdictions in our region require publicly displayed permits for a period of time (usually 14-days) before major trees can be removed (except for exempt situations such as hazard trees or emergency situations). Similarly, several jurisdictions list all active tree permits on a dedicated webpage, highlighting a single phone number that any citizen can call to report possible violations. We strongly suggest the LWMP Work Plan process consider these possibilities.				
142	Engage Bellingham	7/29/24	JHR	Do not cut mature trees unless they are damaging a home.	Land Use	P	Whatcom County Code Section 20.51.430 defines tree removal regulations within the Lake Whatcom Watershed, which provides allowances for hazard tree removal. Hazard tree management is also reviewed per Chapters 16.16 (Critical Areas) and Chapter 23 (Shorelines). Bellingham Municipal Code Chapters 22 (Shorelines) and 16.55 (Critical Areas) allow for removal of hazard trees with mitigation. City of Bellingham Interim Ordinance 2024-05-017 preserves Landmark Trees (>36 in dbh). Tree removal is discouraged by applying mitigation sequencing.	
143	Email	8/23/24	RE Sources	3.1.2 Recommendation: Previous versions of the plan listed the Buildout Report as occurring annually. If this is still the case, the language should be adjusted to reflect this. If this is no longer the case, the Buildout Report should return to being conducted annually.	Land Use	S	Due to little change occurring in the Buildout Report between years, the Buildout Report will now occur once every five years, matching the timeline of the Lake Whatcom Survey.	
144	Email	8/24/24	Christina Maginnis	Reporting Metrics: ADD: Annual buildout report provided to public	Land Use	S	The Buildout Reports are available on the LWMP website, under Resources .	
145	Email	8/24/24	Mt Baker Group-Sierra Club	The “Reporting Metrics” are supposed to focus on acres of native vegetation protected as forest due to city land use regulations, and acres of developed surface treated by phosphorus-limiting Best Management Practices required by regulations. What utility will acre measurement have on future efforts to “preserve and restore land”? How will acres be deemed protected by land use regulations? How will anyone know which regulations might be having (or not having) an impact? This Program Area description is an excellent example of what this draft does all too often: dress up the bones of an apparent environmental protection effort as if there was still meat on them. In fact, the meat is illusory. Much more detail is needed here.	Land Use		For the acres of developed surface treated metric, the City requires conservation easements across “native vegetation protection areas.” These conservation easements preserve NVPAs. These NVPAs specify the amount of land area protected because development regulations in BMC 16.80 specify the mitigation ratio based upon the amount of impervious surface developed. In addition, both the City and County codes require NGPA “native growth protection area” conservation easements in shoreline and critical area codes when impacts occur, and mitigation is required through development permits. These areas are ‘protected’ from future impacts by restrictive covenants in the conservation easement.	
146	Email	8/23/24	RE Sources	Reporting Metrics County issued 74 permits for SFR in LWW in 2023. How many acres of land in total? Were these all under phosphorus-neutral development	Land Use		The work plan no longer says “City only” for this metric and starting in 2025, the County will report on acres of developed surface treated. Past acreage will be calculated for future progress reports.	



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				rules? Why doesn't the county report acres of developed surface treated by phosphorus-limiting BMPs?				
147	Engage Bellingham	8/18/2024	lbw	The County's phosphorus neutral development rules are less stringent than the City's and there has been no effort made to determine how effective the rules have been at keeping phosphorus out of the lake due to development. It seems to be based on the "lets hope for the best" strategy, which is clearly inadequate.	Land Use	P	Staff have reached out to applicable staff at WWU to explore the possibility of studying effectiveness of residential stormwater treatment systems. The Lake Whatcom Data Team would be the group to move forward with this proposal. BMPs that are prescribed as part of the development permit process are approved by code requiring the applicant to follow the Stormwater Management Manual for Western Washington. These BMPs are approved by Ecology for the maximum treatment possible, and that effectiveness is set by Ecology studies on the BMPs. Many BMPs for single-family residences utilize infiltration and do not have a mechanism or infrastructure to ensure its effectiveness. The County can only utilize what is approved by the Department of Ecology.	
148	Email	8/23/24	RE Sources	Reporting Metrics Why are acres of native vegetation protected as forest in perpetuity as a result of city land use regulations in the metrics but not for the county? Recommendation: The county should take action to adopt similar land use regulations to the city and improve clarity and uniformity in land protection outcomes across jurisdictions.	Land Use	P	This metric refers to Native Vegetation Protect Areas which are only part of City code, not County code. If a project uses Dispersion systems (which rely on native vegetation for stormwater control), then they would be required to put the vegetated area in a Protected Native Growth Area (PNGA). These are rarely feasible and so, infrequently used. There is also no system for capturing this information. A change to the reporting metrics does not necessitate a code change.	
149	Email	8/25/24	Whatcom Environmental Council	Section 3.1.3 discusses new Native Vegetation Protection Areas created by City code (provide link to city code or program details), and there are also reporting metrics listed that measure this for just the City. If consistency is important why does this only seem to apply to the City? Does the County have similar requirements? If the County does not have such requirements why not?	Land Use	S	If a project uses Dispersion systems (which rely on native vegetation for stormwater control), then they would be required to put the vegetated area in a Protected Native Growth Area (PNGA). These are rarely feasible and so infrequently used. There is also no system for capturing this information. A change to the reporting metrics doesn't necessitate a code change. The City requires areas to be planted/replanted. Whatcom County Code does not currently have explicit replanting requirements, but has vegetation retention requirements.	
150	Engage Bellingham	8/25/2024	Peter Englander	I tried to look up both city Native Vegetation Protection Areas and county Protection Native Growth Areas and couldn't find information on either of them. Are they the same thing? If so, are they management the same way? If not, why not? Would love to learn more and support these initiatives.	Land Use, Forest Management	S	See #145	



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151	Email	8/25/24	Whatcom Environmental Council	Page 24, Reporting Metrics; “forest” should be defined based on area, how old, what size class, etc. Generic forest is too broad in a metrics.	Land Use	S	The conditions of the forest will change over time and monitoring such metrics is not currently feasible. This metric is based on permit tracking data.	
152	Email	8/25/24	Whatcom Environmental Council	Page 24, first line; insert “and quantity” after quality.	Land Use	S	Water quantity is not part of the Lake Whatcom TMDL.	
153	Email	8/25/24	Whatcom Environmental Council	Page 24, second paragraph; This should also address water quantity.	Land Use	S		
154	Email	8/25/24	Whatcom Environmental Council	The work plan should address the issue of the regulated short term, six-year development moratorium on developable parcels that are clear cut. Several of the goal and objective statements in the plan reference the role that forest cover plays on watershed health and function, and promote protecting forest cover and preserving watershed function. However, the plan should consider the benefits of promoting the regrowth of forest cover well beyond the current term of the six-year development moratorium. Further, promoting a longer duration beyond the current six-year development moratorium gives more time for the clearcut area to recover watershed function.	Land Use, Forest Management	P	An applicant can apply to convert land from Forestland to another use (i.e. house, landscaping, etc.) and it would go through County review to ensure it meets all County codes. SEPA review would also be required, which is publicly noticed and sent to various agencies, including DNR. The 6-year development moratorium is a penalty built into state law for not obtaining a Type IV (Conversion) Forest Practices permit. Conversion after a timber harvest is fairly rare in the County and extremely rare in the Lake Whatcom watershed.	
155	Email	8/25/24	Whatcom Environmental Council	The Forest Management Program should consider a further development of a credit incentive program that provides incentive for landowners to retain forest cover in the development of parcels in the watershed rather than clearcut. Retention of mature trees in a development is consistent with the goals of the state’s Low Impact Development (LID) program (https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/stormwater-permittee-guidance-resources/low-impact-development-guidance) and promotes watershed function and health, which directly relate to water quality and quantity. LID is not even mentioned in the plan.	Land Use, Forest Management, Stormwater Management	P	Whatcom County Code 20.51 requires the retention of tree canopy and underlying vegetation when developing parcels.	
156	Email	7/29/24	Eric Hirst	The plan offers no data on the progress to date in cleaning and protecting Lake Whatcom water quality and how much remains to be done. The plan includes a section on Reporting Metrics but provides no data. Here are some annual data that I think the Coordinating Team should include in the final 5-year plan: <ul style="list-style-type: none"> Phosphorous levels in the three basins 	Monitoring & Data	S	This information is included in the annual report mentioned in section 4.1.1, which states, “Contract with Western Washington University Institute for Watershed Studies to provide annual report regarding water quality and trends in Lake Whatcom and tributaries.”	Added link to Western Washington University Institute for Watershed Studies Lake Whatcom Annual Reports in the



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							City staff samples Lake Whatcom annually during the period of highest boat traffic (typically in August) for specific chemicals (Benzene, Toluene, Ethylbenzene, Xylene; known together as BTEX) that are emitted from the burning of hydrocarbons. The Lake Whatcom Data Team meets monthly to discuss monitoring.	Monitoring & Data resources section.
157	Email	8/25/24	Whatcom Environmental Council	There is a lack of information describing what is and is not actually tested for other than phosphorus and bacteria. As a lake that people drink from, and swim in, there is interest if the water is tested for a variety of chemicals such as benzene, PFAS, pesticides & herbicides, pharmaceuticals, etc. that can come from pg. 3 stormwater, boats, and septic systems? Please describe in more detail what is and isn't tested for, where people can find those test results, and how such testing informs decisions about management of things like boats on the lake, septic system inspections, need for stricter chemical controls, etc.	Monitoring & Data	S		
158	Engage Bellingham	7/28/24	Holly	And, I assume, provide a report to the public on the findings, good or bad. With recommendations on how to improve water quality.	Monitoring and Data	S		
159	Engage Bellingham	7/30/24	Randall, P	No mention of partnering with state and federal agencies to help with the water quality in the lake.	Monitoring & Data	S	A paragraph has been added to explain the TMDL and the state and federal agencies involved.	Added paragraph to the beginning of the Management Challenges section.
160	Engage Bellingham	7/31/24	Simple Truth	What I didn't see in the plan was any mention of how the government intends to monitor the water usage of homeowners who live on the lake, whether they use well water or draw directly from the lake. If you live on the lake, you have no doubt already received this notification. I am firmly opposed to anyone entering my property to carry out such monitoring. It is a violation of my privacy and is intrusive, similar to Big Brother.	Monitoring and Data		Private water usage from the lake or a well is not monitored by the City of Bellingham, Whatcom County, or Lake Whatcom Water & Sewer District and is regulated by the Washington State Department of Ecology. All water quality monitoring conducted on behalf of the City, County, and District is completed at locations with legal access. If this comment is related to the upcoming water rights adjudication, please refer to the Department of Ecology's website here: https://ecology.wa.gov/nooksack-adjudication	
161	Engage Bellingham	8/18/2024	lbw	There are about 20 years of phosphorus concentration data from streams that feed into Lake Whatcom. These data should be paired with flow data to estimate the total loading of phosphorus by stream. That data could then be used to better assess where we should focus our efforts to reduce phosphorus loading into the lake.	Monitoring & Data		This information has been incorporated into the HFAM Lake Loading Model for Lake Whatcom which uses this information to calculate loading rates. This information is used in determining focus areas.	
162	Email	8/23/24	RE Sources	4.2 Tributary Monitoring Recommendation: There are about 20 years of phosphorus concentration data from streams that feed into Lake Whatcom. The data from the Phase 2 report (https://drive.google.com/file/d/17Ler_tjF2vqsLNc43kvK4jYiH4vY1p/view) was paired with modeled flow data for many of the tributaries to estimate the total loading of phosphorus by stream. Austin, Silver Beach, Euclid, and Eagle Ridge creeks were identified as the biggest sources for phosphorus loading. This data should be expanded upon	Monitoring & Data			



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				and used to better assess where we should focus our efforts to reduce phosphorus loading into the lake.				
163	Email	8/23/24	RE Sources	<p>4.2.3 Recommended language: “Analyze existing monitoring results and have in-depth conversations with LW Management Group partners surrounding policy implications and next steps for adapting management strategies.”</p> <p>Rationale: The intent for use of this data to “guide management decisions” is included in the objective for the Monitoring & Data program activities. The work plan should outline policy implications of stream data findings, as well as how these have informed management actions and planning for the next work plan.</p>	Monitoring & Data	S	The Lake Whatcom Data Team meets monthly to discuss monitoring and modeling needs, and already reports out quarterly to the Lake Whatcom Policy Group and the full bodies of the LWMP partners during the annual Joint Councils meeting on pertinent topics.	
164	Email	8/24/24	Christina Maginnis	4.3 ADD: County sampling and measuring performance over time of private systems- currently not doing this critical step	Monitoring & Data	S	Most private property BMPs on single family residences are underground and are not designed to sample.	
165	Email	8/24/24	Christina Maginnis	4.3 ADD: County sample every stormwater outfall to Lake Whatcom. City does this for 26 outfalls. How many outfalls does County have? How many in Phase II area? Start there. County needs to assess and provide treatment at every outfall to the lake over set timeline. City already does this for 100% of outfalls to Lake Whatcom.	Monitoring & Data	S	There are around 150 outfalls into either streams or the lake within the County’s portion of the watershed. A majority of them are on private property, and also in rural areas of the watershed. It is not feasible or cost effective to monitor all of them.	
166	Engage Bellingham	8/25/2024	KerriB	<p>Include water sampling/monitoring of the inlet at Old Mill Village. The property on either side is privately owned but the inlet is not. Old Mill Village is the former site of Larson Mill and clean up of this site has not been performed.</p> <p>(See map submitted on last page of 20240825 Silver Beach Neighborhood Association)</p>	Monitoring and Data	S	The City has not identified a need to sample at this location.	
167	Engage Bellingham	8/25/2024	Peter Englander	All streams and tributaries need to be monitored. My understanding is that only some are. It seems crucial to track all of them to identify point source issues	Monitoring and Data	S	The current tributary monitoring program focuses on larger (by streamflow) tributaries that are primarily in developed areas of the watershed. There are not sufficient resources to perform monitoring of all tributaries to the lake, and the LW Data Team continues to assess the need to do so.	
168	Email	8/24/24	Mt Baker Group-Sierra Club	<p>This section details purely accounting metrics regarding the number and frequency of water sample collections. There is no apparent use of the data for determining if lake water quality is actually improving. Metrics to assess whether or not the quality of lake water (not treated drinking water!) is actually improving are needed, especially in the context of evidence (Figures 2.1-2.13 of the Lake Whatcom Monitoring Project 2022/2023 Report) that suggests this may not be the case.</p> <p>If lake water quality is indeed not improving or worsening, what are the specific plans for mitigation and meaningful monitoring?</p>	Monitoring & Data	S	Please refer the annual monitoring reports available on the WWU Institute for Watershed Studies for an assessment of lake water quality trends.	Added link to Western Washington University Institute for Watershed Studies Lake Whatcom Annual Reports in the Monitoring & Data resources section.



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169	Email	8/25/24	Whatcom Environmental Council	Again, there in mention of lots of great monitoring results, data, reports, and assessments, but there are no links or references provided to where a person could review those things for meaningful details. Please include these links.	Monitoring & Data	O		
170	Email	8/22/24	Bob Mitchell, Climate Impact Advisory Committee Member	Program Area 4: Monitoring & Data (P.26) Maybe include the IWS annual report in the Reporting Metrics section.	Monitoring & Data	S		
171	Email	8/25/24	Silver Beach Neighborhood Association	The city of Bellingham states its drinking water is the best in the state. This is misleading. Bellingham has a pre-treatment and treatment facility that cleans the lake water. There is a difference between treated drinking water and lake water quality. The city also touts the lake is improving. The lake still has dead zones without oxygen during the late summer. Declining inorganic nitrogen may increase growth of toxic algae. Chlorophyll has been trending up in basins 2 and 3 over the past two years. Total phosphorous is still elevated in basin 1 and 2 during the summer when dissolved oxygen is low.	Monitoring & Data	S	Work to improve water quality is ongoing.	
172	Email	8/25/24	Whatcom Environmental Council	The “Focus on Phosphorus” section that starts on page 12 and the Metrics discussion on page 17 would make more sense if incorporated into this Program Area. The Focus on Phosphorus may make some people think that is all that is important which is not the case. Further, forest resource lands in addition to developed areas, need to be identified as a source of Phosphorus as well as other water quality impairments. Water quantity and streamflows should be monitored and referenced because water quality impairment directly relates to streamflow quantities.	Monitoring & Data	S, O	The Lake Whatcom TMDL is focused on phosphorus and bacteria, which drive this work plan and important to call them out in the introduction. See Comment #161 for information on how stream flow measurements area used.	
173	Email	8/25/24	Whatcom Environmental Council	Page 26, first paragraph; insert “water quantity” after water quality.	Monitoring & Data	S	Water quantity is not part of the Lake Whatcom TMDL	
174	Email	8/25/24	Whatcom Environmental Council	Page 26, second paragraph; insert “water quantity” after water quality.	Monitoring & Data	S		
175	Email	8/25/24	Whatcom Environmental Council	Page 26, section 4.1. Water quantity should also be a part of baseline monitoring; insert “water quantity” after water quality.	Monitoring & Data	S		



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			ental Council					
176	Email	8/25/24	Whatcom Environmental Council	Page 26, paragraph under 4.2 Tributary Monitoring; streamflow quantity should be part of baseline monitoring as well as data on water quality parameters.	Monitoring & Data	S		
177	Email	8/25/24	Whatcom Environmental Council	Page 27, 4.5.1 Baseline Data; insert “water quantity” after water quality.	Monitoring & Data	S		
178	Email	8/24/24	Mt Baker Group-Sierra Club	<p>The Objective for this Program Area is laudable, especially the second part: “Prevent water quality impacts associated with improper storage and handling of hazardous materials and ensure that spill prevention and response programs adequately protect water quality.”</p> <p>The estimated investments for 2025-2029 are a mere \$115,000. This is grossly inadequate for such a critical element of maintaining water quality. A large spill or groundwater plume that enters the lake will likely require more than \$115,000 to assess, much less clean up. Who is responsible for these costs? This section also fails to address how clean up and remediation will be accomplished, what equipment is readily available, and who will oversee these efforts.</p>	Hazardous Materials	S	<p>The cost of spill response may exceed \$115,000, depending on the number of spills. A budget in this document is not a maximum, but an expected expense based on estimates of staff time and the number of spill responses. We cannot predict how many spills may occur, but the \$115,000 figure is based on current expenses. There is no expectation that LWMP would stop responding to spills once that amount is spent, and additional emergency funds would be available for a situation you describe. Even so, a spill into a water of the state, like Lake Whatcom, is addressed by the Washington State Department of Ecology’s Spill Response team, which has the equipment, expertise, and funding to clean up and remediate spills to freshwater. There is no function for the LWMP jurisdictions regarding spills into the Lake. Small spills to the ground are intended to be cleaned up before they enter any waterway. While, technically, the spill clean up is the responsibility of the source of the spill (homeowner, vehicle owner, business, etc.) LWMP staff, under this work plan, respond to these small spills and provide assistance on clean up through our Pollution Prevention Specialists and Spill Response team(s). Our goal is to keep it from entering the Lake, through both prevention (education, removal, disposal) and active clean up using equipment purchased and maintained for this purpose, such as containment booms, regenerative air sweeping, vacuum trucks that recapture all water used to clean up, and a wide variety of spill containment materials. If a spill enters Lake Whatcom, our staff calls in the full resources of the Washington State Spill Response group which will coordinate with local Emergency Management and Public Safety agencies if there is concern that the spill would cause additional issues for the public.</p>	
179	Email	8/25/24	Whatcom Environmental Council	Again, this is a high-level overview of good ideas, but does an actual Hazardous Materials Reduction and Management Plan exist that focuses on Lake Whatcom? If so a link or reference should be provided, and if not one should be created. It needs to show best practices, spill plans, etc. for specific users and activities, such as from automobiles, boats, landscaping, etc.	Hazardous Materials	S	A Lake Whatcom specific Hazardous Materials Reduction and Management Plan does not exist. The City of Bellingham addresses hazardous materials citywide through the Pollution Prevention Assistance Program and targeted education and outreach efforts, and the County has similar programming as well.	



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180	Email	8/25/24	Whatcom Environmental Council	It has long been understood that the best and most cost-effective way to prevent impacts from hazardous materials is to not use them in the first place when possible. There needs to be added to this section some discussion and emphasis on reducing the use of hazardous materials in the watershed, not just the proper use, storage, and disposal of them. Is monitoring robust enough to identify materials that are problematic and may need a more regulatory approach?	Hazardous Materials	S	The City of Bellingham and Whatcom County address hazardous materials citywide and countywide through the Pollution Prevention Assistance Program and targeted education and outreach efforts. Reduction of the use of hazardous materials and “Safer Alternatives” are both elements included in these programs.
181	Email	8/23/24	RE Sources	<p>5.2.2 Suggested language: “Ensure that Lake Whatcom residents understand the proper use, storage and disposal of hazardous materials by mailing postcards to all residents twice per year, by attending x number of local events, staff attendance at xx number of neighborhood association meetings, etc.”</p> <p>Rationale: The goals relating to public education currently lack metrics for measuring success. The plan should include reporting metrics to capture the strategies implemented to achieve this outcome, as well as a defined goal or benchmark for success.</p>	Hazardous Materials, Education & Engagement	S	<p>The draft work plan outlines a high-level strategy for public education and engagement. Specific tactics, such as the frequency of mailings or event attendance, will be developed based on available resources and identified needs. This allows for a flexible and data-driven approach to outreach.</p> <p>We agree that tracking the effectiveness of public education efforts is crucial. We aim to measure the overall effectiveness of our education efforts through the 5-year survey and integrate the information learned into our data-drive outreach approach. The draft plan also includes key metrics in the Education and Outreach program area such as:</p> <p>Number of households (new and existing) sent informational materials per year</p> <p>Number of unique visitors to the Lake Whatcom Management Program website per year</p> <p>While we appreciate the suggestion for specific outreach tactics (mailing postcards, event attendance), the work plan focuses on outlining the overall strategy. We will consider a variety of outreach methods when developing staff work plans.</p> <p>Information on year-by-year metric achievements are included in the annual Lake Whatcom Management Program Progress report, available on the resource page of the LWMP website.</p>
182	Engage Bellingham	8/25/2024	KerriB	Determine what clean up is necessary at the former site of Larson Mill, currently Old Mill Village.	Hazardous Materials	S	Any direct water quality impacts to Lake Whatcom or resulting clean-up actions from this site would fall under the jurisdiction of the WA State Department of Ecology.
183	Email	8/25/24	Silver Beach Neighborhood Association	Residents are encouraged to install water quality landscape improvements, and resources and information are provided to homeowners. However, there is no measure and evaluation of violations for pesticides and herbicides and other stormwater effluents.	Hazardous Materials, Stormwater Management	S	<p>The City of Bellingham places a strong emphasis on education, outreach, and technical assistance to mitigate impacts to stormwater. Stormwater ordinances and subsequent penalties can be found here Ch. 15.42 Stormwater Management Bellingham Municipal Code.</p> <p>Washington State prohibits the discharge of pollutants to water bodies, as stated in RCW 90.48.080 and enforced by Washington Department of Ecology.</p>



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184	Engage Bellingham	7/29/24	Northshore Resident	Fireworks are banned within Bellingham City limits and should also be banned in the watershed. Even ignoring the pollutants, the wildfire risk is too much.	Hazardous Materials or Forest Management	P	<p>Bellingham Municipal Code 10.24.130 prohibits the use of fireworks.</p> <p>In unincorporated Whatcom County, Whatcom County Code 5.20 limits the use of fireworks to July 3-5, December 31, and January 1.</p> <p>Comment forwarded to Lake Whatcom Policy Group for consideration.</p>
185	Email	7/25/24	Joani Glasser	Ban the use of fireworks at all times (not just 4th of July and New Year’s Eve). The toxins and pollutants that fall to the Lake are a threat to health. The risk of fires in near-by areas only create more problems for keeping our Lake clean. Please refer to Ben Long’s article in the Cascadia Daily News from about July 2 concerning the fireworks chemicals and the harmful damage to humans, wildlife and all living things.	Hazardous Materials or Forest Management	P	
186	Engage Bellingham	7/29/24	JHR	Enforce no fireworks along lake shore.	Hazardous Waste or Forest Management	P	
187	Engage Bellingham	8/25/2024	Peter Englander	Number of spills etc. reported is an incomplete metric as it doesn't include how/whether they are addressed.	Hazardous Materials	S	All reports of potential spills are investigated. More detailed accounts of spill responses will be added to the Lake Whatcom Management Program Progress Reports.
188	Email	7/26/24	Linda Melland	I believe you need to consider planning for the banning of gas powered vehicles on Lake Whatcom, as our primary drinking water source on the lake. This would include motorized boats, planes, ski-doo's, and the like. Perhaps this could be implemented over a 5-10 year period.	Recreation	P	<p>City staff sample Lake Whatcom annually during the period of highest boat traffic (typically in August) for specific chemicals (Benzene, Toluene, Ethylbenzene, Xylene; known together as BTEX) that are emitted from the burning of hydrocarbons. The monitoring is conducted as part of the Monitoring and Data Program Area in the LWMP Five-Year Work Plans to ensure the safety and cleanliness of public water supplies.</p> <p>In 2006, the City banned the use of carbureted two-stroke motors within the City’s jurisdiction of Lake Whatcom. The County banned them in 2009. Since the implementation of the two-stroke bans, monitoring efforts show BTEX compounds at or below detection levels.</p>
189	Email	7/26/24	Deborah Wessell	As a Bellingham resident, I’m concerned about the number of gasoline-powered boats, planes, ski-doo’s, etc. that are allowed on Lake Whatcom. Surely our primary drinking water source should be protected from the pollution of these engines?	Recreation	P	
190	Engage Bellingham	7/31/24	Kees	In this day of clean and quiet electric-powered boats, I was sorry to see so little content about the use of dirty and excessively noisy gasoline-fueled boat engines in our drinking water source! We should have a plan to ban all boats that are not powered by wind, electricity, or humans.	Recreation	P	
191	Engage Bellingham	7/30/24	Randall, P	There is no proposed restriction of boating on the lake.	Recreation	P	



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192	Engage Bellingham	7/29/24	Northshore Resident	Recreation is a huge draw for visitors to the lake. In order to protect it, the plan should eliminate gas-powered vehicles in the lake and promote human- or wind-powered recreation.	Recreation	P		
193	Engage Bellingham	7/29/24	JHR	Do not allow motorized boats in our drinking water.	Recreation	P		
194	Engage Bellingham	8/6/24	Sam13	As Lake Whatcom provides for our drinking water I'm concerned with recreational motorboat use. Seems like a contradiction that allowing motorboat use by those vessels who power with petroleum products could contaminate the water and substantially degrade or impair our drinking water. I'm wondering how boat use rules or restrictions could be implemented to reduce or eliminate any contamination of our drinking water via motorboat exhaust or other vessel pollution caused output products. Seems like a subject or topic that should be considered and addressed!	Recreation	P		
195	Engage Bellingham	8/1/24	Bradedward	I really wish that gas powered boats and jet skis would be prohibited on Lake Whatcom. I have been out on the Lake many times in the past 2 years and have smelled unburnt gas from passing boats that is undoubtedly contaminating the water. Or at least start charging a daily use fee for powerboats (especially ones that come from out of country) with the goal that the increased fee would reduce the amount of powerboats using the lake. This would also serve to reduce the likelihood of invasive aquatic species from becoming established in Lake Whatcom.	Recreation	P		
196	Engage Bellingham	8/16/2024	JPF01	I would love to see a ban of motorized watercraft on Lake Whatcom. I've never understood why oil and gas powered craft are allowed to operate on our town's precious freshwater source.	Recreation	P		
197	Engage Bellingham	8/17/2024	"25-year resident"	Please, please, please eliminate gas-powered water craft on our drinking water source. Measurable data or not, there is no doubt gas and oil products end up in the water because of these gas-powered craft. Plus, the optics and reality of it are horrible... gas-powered craft zooming over top of our drinking water source. 🤢	Recreation	P		
198	Engage Bellingham	8/17/2-024	Mabel	It seems intuitive that boats on the water are a problem but data does not support that. In fact, nutrients phosphorus from grass. How to get property owners to give up their grass is a challenge.	Recreation	P		



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199	Engage Bellingham	8/19/2024	Constance	I am strongly advocating to end gasoline powered boat motors on Lake WHATCOM	Recreation	P		
200	Engage Bellingham	8/25/2024	Peter Englander	4. Amazed at the number of gasoline engines on the lake for that is the water source for so many. We see this in Lake Chelan too and it's discouraging.	Recreation	P		
201	Engage Bellingham	7/25/24	Zed	Do not even attempt to remove gas power boats from the lake.	Recreation	P		
202	Engage Bellingham	8/2/24	DKap	How the wake boats are creating a safety guard on Lake Powell https://wayneswords.net/threads/big-wakes-what-to-do-to-stop-the-madness.3003/ https://www.outdoorlife.com/conservation/wake-surfing-controversy/ The wake/surf boats have to go. They chew up and destroy the shoreline. They ruin the lake for just about any other recreation on the surface of the water: skiing, sailing, paddle boarding, rowing. Whatever your interest, when the surf boats are out, forget about it. They are the recreational that precludes all others. They ruin everything. They damage and destroy docks, they damage boats that are tied to docks. They disturb the lake bottom and native habitat along the shoreline. At a bare minimum I would expect any new plan to restrict their operation to more than 600' from shore, or restrict their activity to specific areas of the lake and at specific times. Ideally they should be banned from the lake.	Recreation	P	City of Bellingham regulation BMC 8.12.060 and Whatcom County regulations WCC 11.20.010 and WCC 11.16.030 establish rules and speed limits for all boats on Lake Whatcom that are more restrictive than most other waterbodies in the County. These regulations specifically describe wake boats and the limitations on their use, as well as the rules for waterskiing in Lake Whatcom. In addition, South Bay of Lake Whatcom is a designated as a no-wake zone. Enforcement of those regulations is within the jurisdiction of law enforcement agencies, in particular, the Whatcom County Sheriff's Office, that patrol the lake.	
203	Engage Bellingham	8/15/2024	DKap	Another idea for dealing damage caused by surf boats: Implement a fee or tax for any boat with internal ballast and engine horsepower greater than 30. This pool of money could create a fund that could be used to reimburse for property damage caused by surf boats.	Recreation	P		
204	Email	8/22/24	Bob Mitchell, Climate Impact Advisory Committee Member	Program Area 6: Recreation (p. 30) There is nothing in this section about boating on the lake, including education about electric watercraft.	Recreation	S	Language regarding boating, including electric watercraft, has been added to this section.	Added new section 6.3: Boating



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205	Mail	8/3/24	Rick Kiene	After reviewing the current work plan there is one thing forgotten on the users of the lake or visitors who use the lake's amenities, that is a fee for those using Bloedel-Donovan Park. For whatever reason I can not find where either the city nor the county has addressed a user fee for swimming, pet or picnicking at the park. Within the last decade or less there were reports of high coliform counts around the waters of Bloedel-Donovan Park. There is a fee for any watercraft entering the lake for being inspected for invasive species and there is a tax/fee on every property in the watershed why is not a fee for use of the swimming and beach areas?	Recreation	P	<p>Bloedel Donovan Park has an interesting history that involves the dedication of the land as a permanent site for community recreation and access to the lake.</p> <p>Some amenities at the park are rented out for a fee when reserved for events or gatherings. These are the only fees charged for public use of the facilities at Bloedel-Donovan Park.</p> <p>All City Parks are mostly funded through the City's General Fund and are maintained as places for all citizens to enjoy. The Lake Whatcom Management Program and the City of Bellingham Parks Department do not charge use fees for access to public areas.</p> <p>The Parks Department is evaluating charging a fee for boat trailer parking to cover the cost of having traffic flaggers on site.</p>
206	Engage Bellingham	7/29/24	Northshore Resident	Since dog waste is a major pollutant of the lake, why is there a dog park on the lake shore?	Recreation	P	<p>Any pet waste left exposed to rain has the potential to transport bacteria into the drainage system, and by extension, the lake. Closing lake-side dog parks may have a small benefit, but it is unquantified and likely to be minimal compared to better management of pet waste watershed-wide. The LWMP's focus is the proper disposal of dog waste in all areas of the watershed.</p>
207	Engage Bellingham	7/29/24	JHR	Do not have dog park near lake shore.	Recreation	P	
208	Engage Bellingham	8/25/2024	Peter Englander	Not sure why dog waste station metric is here. It's also not prevalent enough given this serious problem. If this is closing our ocean beaches, I shudder to think how it's impacting Lake Whatcom.	Recreation	S	<p>Dog waste is a source of bacterial pollution in the lake. One way to reduce the impact is for pet owners to bag pet waste and place it in dog waste stations for proper disposal.</p>
209	Email	8/25/24	Silver Beach Neighborhood Association	On June 15th, 2023, a Bellingham Herald article stated 16,000 pounds of dog waste is created in Bellingham per day. Harmful levels of fecal waste have been found in all of the urban creeks in Bellingham, especially problematic in the Lake Whatcom watershed. Reduction of fecals in the watershed must be addressed in the LWMP.	Recreation	S	<p>Reduction of bacterial pollution is included in the Lake Whatcom TMDL and is an important component of the LWMP.</p>
210	Engage Bellingham	7/27/2024	Yo Dude	Leave the unauthorized trails as specified in the recreation plan. Removing these will negatively impact erosion and sedimentation more than leaving them, not to mention the costs of removal and the decline of the recreation many of the residents of Bellingham use as the primary reason for living and paying taxes in Bellingham	Recreation	S	<p>Unauthorized trails on the City's Lake Whatcom Land Acquisition and Preservation Program property will continue to be decommissioned and restored with native vegetation. This land is funded by our customers' water utility rate charges at a fixed rate adjusted with CPI-U, not with any taxing structure applied to the City or County for stormwater or otherwise. Additionally, many of these trails overlay with critical areas where permits and myriad BMPs are necessary to mitigate adverse effects to water quality.</p>
211	Engage Bellingham	7/24/24	Homer	Lookout mountain could use expanded trail network. Lake Whatcom blvd needs a boardwalk so people can enjoy the lake.	Recreation	S	<p>Whatcom County Parks and Recreation Department is in the process of implementing the Lookout Mountain Forest Preserve and Lake Whatcom Park Recreational Trail Plan. Your suggestion for a Lake Whatcom Boulevard</p>



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							boardwalk has been forwarded to the Parks and Recreation Department for consideration.	
212	Engage Bellingham	8/25/2024	Peter Englander	7.2 Overlap - more trail development on small tracts of public lands between streets to improvement walking in neighborhoods.	Recreation	S	Whatcom County Parks and Recreation Department is in the process of implementing the Lookout Mountain Forest Preserve and Lake Whatcom Park Recreational Trail Plan . Your suggestion for more trail development on small tracts of public lands between streets to improvement walking in neighborhoods has been forwarded to the Parks and Recreation Department for consideration.	
213	Email	8/25/24	Whatcom Environmental Council	Section 6.1.4 seeks to ensure recreational opportunities offered through third-party vendors comply with water quality goals and land use regulations. This idea should be expanded to ensure that all recreational activities comply with water quality goals and land use regulations. A new section 6.1.5 should be added that flips this consideration to include – water quality goals and land use regulations are regularly reviewed to ensure they are robust enough to protect the lake from increasing levels of recreation. Is there any policy that states that water quality is a higher priority in the watershed than recreation?	Recreation	P	There is currently no policy that states that water quality is a higher priority than recreation in the watershed. This comment has been forwarded to the Lake Whatcom Policy Group for consideration.	
214	Email	8/25/24	Whatcom Environmental Council	There has been some discussion in the community about the desire to create and promote events, large organized trail runs and bike rides, races, fishing derbies, car rallies, etc. in the watershed. Is there a policy to assess such activities, and discourage or ban such activities if they would directly or indirectly impact water quality, or if local tax payers would have to foot the bill to mitigate those activities?	Recreation	P	At this time, Whatcom County Parks and Recreation Department does not permit commercial events in Lake Whatcom Park or Lookout Mountain Forest Preserve. This was based on an assessment of: <ul style="list-style-type: none"> • Capacity for infrastructure to accommodate the use while maintaining access for the public • Compatibility with watershed protection goals and objectives • Impact to and displacement of public use • Impact to trail conditions The department is willing to revisit this assessment in the future. There has not been any assessment by City of Bellingham Parks & Recreation of water quality impacts of potential events. Recreational access is an important part of public support for significant taxpayer investments in public land around the lake. Special events require contractual agreements, insurance, and requirements that any damage is repaired or mitigated.	
215	Email	8/25/24	Whatcom Environmental Council	There is a real tension between protecting water quality and increasing recreational infrastructure and activities within the watershed. Things such as illegal trail building, increasing parking lots for more recreational visitors, more car traffic on watershed roads, more boats on the lake, more dogs pooping on trails, etc. all have an impact. The plan needs to discuss how decisions that may increase these recreational impacts are considered. In section 1.2.2 there is mention	Recreation	S	Whatcom County Parks and Recreation Department’s Lookout Mountain Forest Preserve and Lake Whatcom Park Recreational Trail Plan is provided as a reference. The plan includes a detailed discussion of recreation activities with potential to impact water quality and lists actions to be avoided and mitigation steps to minimize impacts.	



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				(no details) of a new guidance document that the City is creating to perhaps address such considerations and conflicts. That guidance should be discussed in this section and should be consistent with County considerations as well.			In addition, the COB and Whatcom County are coordinating on a Forest Management Plan for the watershed that will include incorporate review of the above plan and whose recommendations will incorporate recreational activities into forest management recommendations consistent with Lake Whatcom Management Plan policy goals.	
216	Email	8/24/24	Mt Baker Group-Sierra Club	<p>Section 6.1, “Recreational Facilities,” says: “Develop or improve recreational facilities to support recreational opportunities while reducing impacts to lake water quality.”</p> <p>Is this an achievable goal? What type of recreational facility would actually reduce impacts on lake quality?</p> <p>Nothing is mentioned about limiting expansion of existing facilities or the creation of new facilities. There is no comment on boating and related facilities, a major form of recreation with adverse lake quality effects. Would limitations on boating “protect, preserve and enhance water quality,” one of the goals in the 1992 Resolution. This rather glaring omission needs to be addressed.</p>	Recreation	S	Improvements to recreational facilities can lead to water quality improvements. Examples include installing water treatment infrastructure at parking lots when undergoing expansion or decommissioning trails that are not built to current trail standards and replacing these with trails that are built to current standards.	
217	Email	8/23/24	RE Sources	<p>6.4.1 and 6.4.2 Suggested language: Example: Ensure that Lake Whatcom residents and visitors understand which recreational practices protect water quality and which negatively impact water quality by mailing postcards to all residents twice per year, by attending x number of local events, through field outreach conducted by staff x times throughout peak recreation seasons, etc.</p> <p>Rationale: There are several goals relating to public education that currently lack metrics for measuring success. The plan should include reporting metrics to capture the strategies implemented to achieve this outcome, as well as a defined goal or benchmark for success.</p>	Recreation, Education & Engagement	S	<p>The draft work plan outlines a high-level strategy for public education and engagement. Specific tactics, such as the frequency of mailings or event attendance, will be developed based on available resources and identified needs. This allows for a flexible and data-driven approach to outreach.</p> <p>We agree that tracking the effectiveness of public education efforts is crucial. We aim to measure the overall effectiveness of our education efforts through the 5-year survey and integrate the information learned into our data-drive outreach approach. The draft plan also includes key metrics in the Education and Outreach program area such as:</p> <ul style="list-style-type: none"> • Number of households (new and existing) sent informational materials per year • Number of unique visitors to the Lake Whatcom Management Program website per year <p>We acknowledge the value of the suggested outreach methods (postcards, events, field outreach). Specific tactics will be determined when creating staff work plans, based on available resources and identified needs.</p> <p>Information on year-by-year metric achievements are included in the annual Lake Whatcom Management Program Progress report, available on the resource page of the LWMP website.</p>	
218	Engage Bellingham	8/25/2024	Peter Englander	6.1.2 Whatever integrated pest management practices are determined and implemented should be information should provided to everyone in the watershed.	Recreation, Education &	S	Section 9.3.3 includes educating residents about natural yard care practices. This includes integrated pest management practices.	



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219	Email	8/24/24	Mt Baker Group-Sierra Club	<p>Section 6.1.3 states: “Infiltrate or treat stormwater following stormwater Best Management Practices”.</p> <p>What BMPs are being referred to? How can the public access them?</p> <p>What does “infiltrate” mean in this context?</p> <p>Are there stormwater facilities at all the recreation facilities? Are they being monitored and are there plans to improve monitoring, mitigate current facilities, or build new ones?</p>	Recreation	S	<p>“Best Management Practices” (BMPs) is a defined term from the field of stormwater management. It refers to methods or facilities defined in the Stormwater Management Manual for Western Washington (SWMMWW), last updated in 2024 by the Department of Ecology. Stormwater BMPs fall into two categories, runoff treatment and source control. Source control BMPs include operational activities, like maintenance, street and parking lot sweeping, pet waste pickup, and other methods by which phosphorus or bacteria are prevented at their source. Runoff Treatment BMPs use biological, chemical, or physical methods to remove or capture pollutants that have already entered the stormwater flows. Treatment BMPs are evaluated for their effectiveness by the State Department of Ecology prior to approval and must be designed per the SWMMWW to be permitted or funded with State funding.</p> <p>Infiltrate means to pass stormwater through a minimum of 1’ of native soil (3’ for areas larger than 5,000 square feet) where the soil suitability criteria found in the SWMMWW is met. This suitability criteria includes things like percentage organics, cation-exchange capacity, and hydrologic conductivity. Infiltrating stormwater is shown to remove pollutants through treatment in the native soil matrix and by flow through deep soils to groundwater.</p> <p>Whatcom County Parks and Recreation has stormwater infiltration devices at certain park locations within the LW Watershed and continues to plan for such installations as part of new recreation development. Locations where such facilities exist include Lookout Mountain (infiltration) and most recently Stimpson Family Nature Reserve (Media Filter Drain). Preliminary designs identify stormwater facilities at Lake Whatcom Park as part of planned parking lot renovations. These facilities require monitoring and periodic maintenance, the type of which varies according to the design of the facility.</p> <p>The City of Bellingham Parks and Recreation Department constructs and maintains water quality treatment systems at Bloedel Donovan Park. The 2015 Bloedel Donovan project installed a Media Filter Drain (MFD) trench at the interface between the large open lawn and an improved shoreline buffer. Subsurface infiltration (where stormwater can flow into native soil below) was encouraged through the bottom of the MFD.</p> <p>The City of Bellingham Parks and Recreation Department partners with the Public Works Maintenance division to manage runoff from the Bloedel parking lot and other parking areas on the site through stormwater filters placed in the drainage infrastructure before runoff enters the Lake. Bloedel</p>	



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							also has two rain gardens that treat parking lot runoff. The City, through this partnership, will continue to monitor, maintain, repair, and replace components of these facilities. The City of Bellingham maintains stormwater BMPs on public land and is currently developing an Enhanced Maintenance Plan to increase the performance of our maintenance activities. That EMP will be completed as part of this five-year work plan and will apply to facilities on Parks land.	
220	Email	8/24/24	Christina Maginnis	ADD - Pre-launch inspections by Sheriff in County -add training and involve Sheriff b/c of County launch sites	AIS	P	See comments 223 and 227 regarding Sheriff involvement.	
221	Email	8/24/24	Christina Maginnis	ADD: Update codes prohibiting introducing AIS into lake. No more bypassing inspections without legal consequences.	AIS	P	This is already prohibited by Whatcom County Code 2.27A.020 . and Bellingham Municipal Code 12.12.280 .	Added links to County and City codes in the references section.
222	Email	8/24/24	Mt Baker Group-Sierra Club	This section fails to mention that the AIS program is not conducted year-round. Given the existing perennial use of the lake, the lack of continuous monitoring increases the likelihood of missing aquatic invasive species infestations. This major omission needs clarification, and details for operating continuous monitoring are needed.	AIS	P	While inspections for AIS compliance at the boat launch are seasonal, the regulations that require all boats on the lake to be inspected are year-round. Residents and visitors can, and must by law, be inspected and have annual dues paid to be on the lake, even when check stations are closed. LWMP staff are available year-round for off-site inspections on residents' properties or trailered inspections at the City Operations Facility. Additionally, cameras are in place at relevant boat launches to monitor for risks due to off-hour launches and data from this monitoring indicates the accuracy of our risk assessment evaluation. Conveniently, state programs to intercept and inspect boats moving across state lines help to fill in the gap during the winter months by ensuring that watercraft are not imported into the state with invasive species on board.	
223	Engage Bellingham	8/25/2024	Peter Englander	2. AIS is very visible if and only if one enters the lake at either the three stations or Euclid Park where there are signs. There are many other public entries and tons of private entries. I have also never seen on-water enforcement.	AIS	S	<p>The AIS program covers all public boat launches on Lake Whatcom with staffed check stations or interpretive signage. Yes, there is an A-frame at Euclid, as well as signage at North Lake Whatcom Park and the unnamed County Park at the south end of the Lake.</p> <p>The AIS Program conducts many off-site (away from public launches) visits to private boat launches around the Lake. Boaters can also make appointments to meet AIS staff at a public boat launch year-round while inspection stations may not be open. In 2024 AIS staff conducted 1,581 off-site inspections to engage and permit resident in and around Lake Whatcom and Samish. The Lake Whatcom Management Program has also sent outreach material to every home located in the Lake Whatcom watershed (LWW) and provides a "New Homeowner Packet" each time a LWW property turns over in the Assessor's database.</p> <p>Additionally, City of Bellingham has an Interlocal Agreement with Whatcom County Sheriff's Office. The Sheriff's office patrolled for a total of 158 hours on Lake Whatcom alone during 2024.</p>	



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224	Email	8/23/24	RE Sources	7.1.5 Suggested Language: "Evaluate operational changes that may decrease risk or increase efficiency and coordinate with other jurisdictions when implementing changes to ensure effective outcomes." Rationale: Cohesive risk mitigation strategy across jurisdictions (where applicable) allows for maximum impact and benefit from adaptive management decisions.	AIS	S	Comment incorporated as requested.	Added "and coordinate with other jurisdictions when implementing changes to ensure effective outcomes." to Section 7.1.5.
225	Email	8/25/24	Whatcom Environmental Council	Page 32, second paragraph, third line; after Lake Whatcom, insert "and minimizing existing invasion of other aquatic invasive species."	AIS	S	The Lake Whatcom Boat Inspection Program is responsible for risk reduction only, but does implement some monitoring of existing invasive species. For treatment or removal of AIS the jurisdiction falls to the Washington Department of Fish and Wildlife, the lead agency on invasive species issues in the state. However, in 2025 City of Bellingham is assembling a rapid response plan for Lake Whatcom with a consultant. This plan will provide site-specific rapid and extended local-response activities and provide a clear roadmap for decision makers to respond to an introduction of an aquatic invasive that would threaten drinking water quality or infrastructure.	
226	Engage Bellingham	8/25/2024	KerriB	Require property owners of any rental within the watershed to provide education and awareness to tenants.	AIS	P	The Lake Whatcom Management Program has sent outreach material to every home located in the Lake Whatcom watershed and provides a "New Homeowner Packet" each time a property turns over in the Assessor's database.	
227	Engage Bellingham	8/25/2024	Peter Englander	More on-water inspections More signs at public access points like what's posted at Euclid Park (and they should be permanent signs vs. A-boards	AIS	S	The Whatcom County Sheriff Office conducts on-water enforcement but may be limited by weather conditions, other events requiring their attention, and boat traffic. There are also signs at North Lake Whatcom Park and the unnamed County Park at the south end of the Lake.	
228	Email	8/25/24	Silver Beach Neighborhood Association	Although essential, the AIS program is not enough to prevent further degradation to the lake.	AIS	S	The 5-year workplan is meant to communicate program goals and objectives over the next 5 years. It does not contain operational details for any of our program's daily protocols and procedures. The City is considering operational changes to fill gaps in the inspection program during this five-year cycle. This includes looking at methods to disallow unpermitted boats the ability to launch at public launches year-round.	
229	Email	8/25/24	Whatcom Environmental Council	Nowhere in this section, or the associated "resources" at the end of the Plan, are the actual requirements for this aquatic invasive species (AIS) program spelled out. We appreciate how quickly this program was put together and launched, and the effort that has been expended, but since its inception this program was acknowledged to	AIS	S	Additionally in 2025, City of Bellingham is assembling a rapid response plan for Lake Whatcom. This plan will provide site-specific rapid and extended local-response activities. It will also provide the City and other Lake Whatcom entities a clear and concise plan that delineates specific processes, protocols, and communication requirements based on the location of the	



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				be a leaky sieve since staffed inspections are only available during certain hours and months, and since there are known private launch areas where inspections can be avoided. Since it would only take one boat with Zebra Mussels entering the lake to infest the entire lake, and since efforts to remove such invasive species after infestation have not shown much success, such holes in the inspection system represent a real risk. This section of the Plan should discuss how continuous improvement efforts for this AIS program are working to decrease the holes in the inspection program, and what thresholds are used to decide whether stronger protections such as closing all boat launches when inspection are not available, banning private boat launches, banning boats that are not permanently docked on the lake, etc. This section should make clear how the calculations of risk were done that shows the potential for millions of dollars of impacts from invasive species is so minimal that it is OK to continue to allow people to use boats for fun on our drinking water source			presumed future detection and the extent of the discovered infestation. At its foundation, the Lake Whatcom and Greater Whatcom County Zebra and Quagga Mussel Rapid Response Plan will ensure an understanding of legal authorities and provide advance preparation of formal agreements to address roles, responsibilities, and procedures should a zebra or quagga mussel detection occur.	
230	Email	8/25/24	Whatcom Environmental Council	Other reporting metrics that should be added in the spirit of continuous improvement would be: <ul style="list-style-type: none"> • Number of private boats launches or hand launch sites available on the lake. • Percentage of total hours in the year that public launch facilities are available without inspection personnel present 	AIS	S	Tracking data at private launches on the lake is outside of the jurisdiction of the LWMP and would exceed the current capacity of the AIS program. Please see the AIS annual report, www.whatcomboatinspections.com , or call the hotline (360)778-7975 for launch hours.	
231	Engage Bellingham	7/29/24	Northshore Resident	Create safe bike and pedestrian passage on roads around the lake, including Northshore.	Utilities & Transportation	S	Planning for bike and pedestrian routes is done through the City of Bellingham’s Pedestrian Master Plan and Bicycle Master Plan and Whatcom County’s Pedestrian and Bicycle Plan . Both plans address priority projects across the jurisdiction, including in the Lake Whatcom watershed. Additional suggestions for improvements within city limits can be submitted through the City’s Bicycle Pedestrian Improvement Request . Suggestions for improvements outside of city limits can be directed to the Whatcom County Bicycle/ Pedestrian Advisory Committee .	Added links to City of Bellingham’s Pedestrian Master Plan and Bicycle Master Plan and Whatcom County’s Pedestrian and Bicycle Plan in Utilities & Transportation resources section.
232	Engage Bellingham	7/29/24	JHR	Create safe non motorized route around entire lake, including section east of Sudden Valley that would link to Hertz Trail.	Utilities & Transportation	S		
233	Engage Bellingham	7/26/2024	Sophie Ziliak	Notably absent from this plan is any direct mention of an actionable item which would impact program areas 11, 6, and 8: construction of new bikeways in unincorporated areas of the watershed. The plan authors want to promote climate and watershed friendly transit, as well as responsible recreation, and yet for several thousand residents along Lake Whatcom Boulevard and Lake Louise Road, the ability to safely bike to school, work, and errands is severely limited. Currently, very few residents of Sudden Valley and nearby neighborhoods are able to bike on these roads due to safety concerns, despite public interest in biking for recreation, climate, and watershed benefits. Adding bike lanes along the western shore of Lake Whatcom would reduce impacts to water quality from car transportation, and encourage the use of zero/low carbon transportation options in the	Utilities & Transportation	S		



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				watershed. Bike lanes in this key area would also provide access to outdoor recreation that is consistent with water quality goals. Construction of new bike lanes in the watershed is desperately needed for all of these reasons and would directly improve the metrics described in this plan. As such, construction of new bike lanes in the watershed, preferably on Lake Whatcom Boulevard/Lake Louise Road, should be made an explicit goal in the 2025-2029 Work Plan. As an unincorporated Whatcom County resident, I look forward to the partner agencies stepping up and finally taking action on this issue.				
234	Engage Bellingham	Homer	7/26/2024	Lake Louise need path along side for hiking, riding bikes and runners to keep out of the road.	Utilities & Transportation	S		
235	Engage Bellingham	John C	7/26/2024	We need to either add bike lanes to Lake Whatcom Blvd or stop allowing bicycle races on that road.	Utilities & Transportation	S		
236	Email	8/23/24	RE Sources	8.3.3 Recommendation: The watershed should be assessed to identify infrastructural barriers to using alternative transportation and jurisdictions should plan to mitigate these where possible to increase safety and accessibility of active transportation modes especially. Rationale: Resources invested in education and encouragement around alternative transportation will not translate to increased adoption of these options unless barriers to safety and access are addressed to make them feasible and appealing to watershed residents and visitors.	Utilities & Transportation	S		
237	Email	8/25/24	Whatcom Environmental Council	Informing and encouraging “watershed residents and visitors about alternative transportation opportunities” will continue to be ineffective without actual viable alternative opportunities. The plan should include the actual plans to deliver more and separated bike/walking lanes, and functional bus / shuttle service to recreational facilities such as the Hertz Trailhead. Continuing to only encourage alternate transportation opportunities (when they are so limited), while building more and larger parking lots for cars, undermines credibility.	Utilities & Transportation	P		
238	Engage Bellingham	8/18/2024	lbw	A strategy to "inform watershed residents and visitors about alternative transportation opportunities" will be entirely ineffective unless and until actual active transportation infrastructure such as separated bike lanes are installed in the watershed.	Utilities & Transportation	S		



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239	Email	8/25/24	Whatcom Environmental Council	Again, the main problem with this section is the lack of any detail to allow the reader to know what is really being discussed or done. For example, what does “Provide sewer service to areas with OSS systems when appropriate” mean? Has analysis been done that shows septic systems are negatively affecting the lake? Has analysis been done to determine whether sewer service is better than septic for the lake when sewer overflows are considered? Has analysis been done, or policies put into place, to ensure that running a sewer line through an area would not enable more development? For another example, what does “Employ road design standards to reduce impacts to water quality” mean? Does that include a commitment for use of pervious surfaces?	Utilities & Transportation	S	<p>The work plan is an overarching guidance document that is supported by other plans/programs that are specific to regulations and/or LWMP objectives. Specific to the cited wastewater management example, it is generally accepted that collection and conveyance of sewage out of the watershed for treatment/disposal is preferred to treatment/disposal in the watershed via OSS. Associated studies are available on the LWMP website. That said, the feasibility of the extension of sewer service is significantly constrained both statutorily (Washington State Growth Management Act) and by cost (insufficient development densities). As a result, “provide sewer service to areas with OSS systems when appropriate” is intended to mean extension of sewer service if an OSS is in direct proximity to an existing sewer main (i.e., relatively cost-effective) or when there is a confirmed impact to public health and the environment (statutory requirement).</p> <p>Regarding the road design standards comment, reducing impervious surfaces through pervious pavement or narrowed lanes, and expansion of stormwater collection/treatment are examples of design standards that can mitigate impacts to water quality.</p>	
240	Engage Bellingham	7/30/24	Randall, P	There is no mention of helping homeowners with broken septic systems in the watershed get financial assistance to fix those systems	Utilities & Transportation	S	<p>There is a mechanism for this through Whatcom County Health & Community Services. This has been added to Section 8.2.3.</p>	<p>Add to 8.2.3: Enforce OSS system operation and maintenance regulations, maintain OSS database, respond to failing systems, <u>and offer financial assistance to repair or replace failing septic systems.</u></p>
241	Email	8/24/24	Christina Maginnis	<p>8.2.3 Increase Whatcom Co health follow up on Onsite septic system inspection and enforcement. We have 789 OSS in the Lake Whatcom watershed, and have 37% (~291 OSS) that have no inspection report in 2023. Lake Whatcom watershed is a top priority and this area needs 100% compliance due to water quality impacts from septic systems fi they are failing.</p> <p>ADD Whatcom County health staff to consistently/completely follow up on non-reports for OSS inspection. If OSS self-inspection reporting lacks compliance, then remove self reporting option.</p> <p>Alternate – update code to require a “time of sale disclosure of past OSS reports” to buyers. If haven't been reporting as required, consequences at time of sale.</p> <p>ADD: Whatcom County Health dept increase in staffing</p>	Utilities & Transportation	P	<p>See Whatcom County Code 24.05 for requirements related to inspection requirements, time of sale inspections and see RCW 64.06 for real estate requirements. Whatcom County Health and Community Services staff follow up to ensure malfunctioning systems are repaired or replaced. OSS that are not in compliance with maintenance requirements are enforceable and may lead to fines or legal action. Staff also investigate complaints from the public about potential OSS failure. This may include site visits and document reviews. There are about 125 OSS on the Lake Whatcom shoreline.</p> <p>The District requires inspection of private side sewers for all new development connecting to its sewer system. Further, the District routinely video inspects its sewer mains and notifies property owners in cases where a connected side sewer appears to be allowing inflow and infiltration (I&I). The District has previously explored the feasibility of requiring inspection of existing private side sewers at time of sale; however, it was determined that</p>	



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				<p>What follow up and enforcement does Health Dept do to ensure these OSS are working? How many are on creeks or shorelines? OSS failure would have higher direct impact to water quality issues.</p> <p>ADD time of sale LWWSD side sewer inspections.</p>			<p>the District does not have the authority to require notice of sale and, therefore, does not typically learn that a property has changed ownership until after the sale is complete.</p> <p>Comment forwarded to Lake Whatcom Policy Group for consideration.</p>	
242	Email	8/24/24	Christina Maginnis	<p>8.2.1 Comment – do not agree that sewer lines should be extended to OSS lots, if they fail and are outside currently served area. Instead, purchase and remove onsite septic systems and home from watershed, especially close to lake shore (Northshore rd) or creeks with higher bacteria levels– Carpenter, Beaver, Austin Creeks.</p>	Utilities & Transportation	P	<p>Condemnation of properties with failing OSS to enable acquisition is a legal and policy decision. Comment forwarded to Lake Whatcom Policy Group for consideration.</p>	
243	Email	8/24/24	Mt Baker Group-Sierra Club	<p>One of the remediations mentioned here is to “[p]rovide sewer service to areas with OSS [on-site sewer] systems when appropriate.”</p> <p>This begs the question: When is it appropriate? What are the standards for appropriateness to be applied? And who makes that determination?</p>	Utilities & Transportation	S	<p>The Washington State Growth Management Act (RCW 36.70A) prohibits the extension of urban services, which includes sewer service, outside of cities and their urban growth areas unless necessary to protect human health and the environment. Determination of appropriateness for extension would be made by Whatcom County Planning and Development Services, Whatcom County Health and Community Services, and Washington State Department of Ecology.</p>	
244	Engage Bellingham	8/25/2024	Peter Englander	<p>3. Very surprised there is sewer overflow into the lake but we see it/smell it at Geneva St and at Cable/Lake Whatcome Blvd intersection: Just wow.</p>	Utilities & Transportation	S	<p>The District has no record of an overflow occurring at its Geneva Street or Cable Street lift stations over the past 20 years. Should you witness an overflow, please contact the District immediately at 360.734.9224.</p>	
245	Engage Bellingham	8/25/2024	Peter Englander	<p>Is it true that there are combined sewer overflows at Lake Whatcom? Why do we smell sewage and see outflows at the Geneva (lift?) station and the station at Cable/Lake Whatcom Blvd? 8.2.2 - Goal should be to eliminate sewage overflows, not reduce them. And where's the data on these?</p>	Utilities & Transportation	S	<p>Both the City and District operate sewage collection and conveyance systems within each’s service area in the watershed (there are no combined sewer systems—the City and County operate stormwater systems that are independent of sewer systems). While the goal is to eliminate sewage overflows, no system is fail-proof. Regarding the District’s Geneva and Cable Street sewer lift stations, the District has no record of an overflow occurring at either station over the past 20 years. Should you witness an overflow, please contact the District immediately at 360.734.9224.</p>	
246	Email	8/24/24	Christina Maginnis	<p>Reporting Metrics: (Number of sewer overflows that reach Lake Whatcom per year) ADD # of total overflows too as this is telling how well current response works to prevent sewage from reaching lake once notified of overflow.</p>	Utilities & Transportation	S	<p>Comment incorporated as requested.</p>	<p>Added reporting metric to 8.2: Number of sewer overflows in the Lake Whatcom watershed per year</p>
247	Email	8/25/24	Whatcom Environmental Council	<p>Nowhere in the draft plan is there information about the use of the City of Bellingham’s Middle Fork diversion into Lake Whatcom. This diversion can help maintain water levels in the lake and Whatcom Creek, but if taken July through September could negatively affect stream flows for salmon and steelhead runs in the main stem and middle fork of the Nooksack river. Discussion of the use, quantification,</p>	Utilities & Transportation	S	<p>Please refer to the City of Bellingham’s website www.cob.org/services/environment/lake-whatcom/lw-level for information regarding maintenance of the levels of Lake Whatcom and flow management in Whatcom Creek. Water is diverted from the Middle Fork Nooksack River only when necessary to maintain lake levels within the legal requirements. The City voluntarily complies with instream flow and strives</p>	<p>Added link in references section to City’s Water System Plan, which provides details on the Middle Fork diversion.</p>



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				and timing of diversions from the middle fork into Lake Whatcom should be included in the plan.			to minimize impacts to the Middle Fork salmon populations. Additional details are provided in the City’s Water System Plan, which is currently being updated.	
248	Email	8/20/24	Puget Sound Gillnet Fishermen and WRIA 1 Fishers Caucus	The current City of Bellingham’s Lake Whatcom Management Work Plan and the COB’s Draft Lake Whatcom Management Program 2025-2029 Work Plan (DLWMP2005-2029WP) do not specify the COB’s intended seasonal withdrawal of water from the Nooksack River’s Middle Fork. Our question is “under what conditions and when would COB transfer water from the Middle Fork to Lake Whatcom including the anticipated daily volume during the time of transfer?” The answer to this question should be included in the DLWMP 2025-2029WP. Water transfers from the Middle Fork (MF) to Lake Whatcom during August and September should be avoided due to salmon and steelhead migration timing in the Nooksack River mainstem, its North Fork and Middle Fork. Reduced MF stream flow, a result of climate change and drought, could negatively affect the recovery of three Puget Sound species listed as threatened under the federal endangered Species Act; Puget Sound Chinook, Puget Sound Steelhead, and Puget Sound Bull Trout.	Utilities & Transportation	S		
249	Email	8/20/24	Puget Sound Gillnet Fishermen and WRIA 1 Fishers Caucus	The Bellingham Technical College (BTC), for its Fisheries and Aquaculture Sciences Program, operates a salmon hatchery located in Maritime Heritage Park. The hatchery is served with water taken by pipeline from lower Whatcom Creek just above the falls below the Prospect Street Bridge. The creek water is often contaminated with non-point source pollution that affects the hatchery’s operations. In late November for example, adult chum salmon returning to the hatchery are spawned. However, the fertilized eggs are taken to the Washington Department of Fish & Wildlife Kendall Creek Salmon Hatchery for incubation to the eyed stage before being returned to the BTC Hatchery. This arrangement is required because the latter hatchery’s Whatcom Creek water is not suitable for the first six weeks of chum salmon embryonic development. BTC has made expenditures to improve the creek’s water quality, both at the creek source pipeline and within the hatchery building. There is a source of Lake Whatcom water of higher quality, if the BTC Hatchery could tap in to lake water in the pipeline that provided untreated water to the former Georgia Pacific Pulp Mill waterfront site.	Utilities & Transportation, Hazardous Waste	S	This comment is not applicable to the work plan specific to protecting/enhancing the water quality in Lake Whatcom. City of Bellingham staff work closely with BTC staff on their operations and this item can be added to the list of items we discuss with them.	
250	Engage Bellingham	8/25/2024	Peter Englander	All arterials should have a speed limit of 20 mph. No one should be driving any faster anywhere in the watershed. Bus service should be increased on the major lines reaching into the far reaches of the lake.	Utilities & Transportation	S	Both the City of Bellingham and Whatcom County set speed limits on roads in accordance with the current revision of the Manual on Uniform Traffic Control Devices (MUTCD), which is published by the Federal Highways Administration.	



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							The Whatcom Transit Authority develops its routes based upon sustainable ridership projections.	
251	Email	8/24/24	Christina Maginnis	8.3.1 Could County treat road shoulders similar to the City's portion of roads in watershed? Would slow and treat road runoff for forestry areas as well as developed areas	Utilities & Transportation	S	Portions of the road system in the County are generally designed to rural standards while the portion in the City is designed to urban standards. Available right-of-way, topography, and cost are all factors that significantly affect the County's ability to implement urban-level standards.	
252	Email	8/24/24	Christina Maginnis	8.3.2 Sudden valley roads – need increased sweeping / but roads not to code and private, Sweep here and any contract with Bayside REQUIRE them to measure and report what they sweep. County has no sweepers, so not measuring of effectiveness. County needs to buy its own sweeper trucks to measure effectiveness. Stormwater utility district raises funding for capitol investments like this.	Utilities & Transportation	S	As the commentor notes, the local road system within Sudden Valley is owned and maintained by the Sudden Valley Community Association. SVCA maintains this system within its available financial resources. The County contracts with a private company to do street sweeping in the watershed and measures and reports what they sweep.	
253	Email	8/25/24	Whatcom Environmental Council	While this section is referred to as Education and Engagement few details are provided about the specific programs. Links or references to these details should be provided, and enough information made available, so it is clear which activities are one-way educational communications meant to inform the public about important issues, versus two-way communication efforts meant to engage the public in greater behavior change.	Education & Engagement	O, S	Each section contains a resources section that links to respective program webpages that detail the type of outreach completed in the work. Additional information about education and engagement work resides under specific program areas in this work plan.	Resources section was broken up and distributed through their relevant program areas and additional resources were added. Link to LWMP webpages "get involved" page was added to the resource section of the Education and Engagement in the work plan.
254	Email	8/23/24	RE Sources	9.1.3 and 9.1.5 Recommendation: There is limited mention of the 2023 Lake Whatcom Watershed Baseline data outside of this line listing examples for education programs to expand. The plan should include a summary of results for the 2023 surveys, assess changes occurring between then and the original 2018 baseline survey, and detail how these findings have been incorporated into recommendations and changes to the next work plan.	Education & Engagement	S	We added more information to the LWMP resources page of the website about the baseline survey and how it is informing our work, including a newly developed summary of the 2024 results. The City of Bellingham is currently performing an analysis of the 2024 results, the 2018 results and LWMP programs conducted during that time to determine if outreach programs influenced survey responses. As we determine year by year tactics for our workplan, the analysis will help inform these decisions. To effectively address the insights gained from the survey, LWMP education and outreach staff will implement a comprehensive approach that combines data-driven decision-making, collaborative partnerships, targeted outreach, and educational program development.	Added link to surveys results, which includes a summary of the 2024 survey results , on resources page of LWMP site.



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							<p>Key strategies will include:</p> <ul style="list-style-type: none"> • Leveraging survey data: Analyzing the survey results compared to the education and outreach efforts from the past 5 years to identify specific areas for improvement. • Partnering with stakeholders: Identifying opportunities to collaborate with local organizations, community groups, or experts to develop comprehensive and effective initiatives or materials. • Employing targeted outreach: Utilizing a variety of communication channels to reach a diverse audience and promote awareness of Lake Whatcom issues. • Creating educational programs or materials: Developing engaging and informative materials, workshops, or presentations to address identified knowledge gaps. • Continuously evaluating and refining: Regularly assessing the effectiveness of our initiatives and materials and making necessary adjustments to ensure maximum impact. 	
255	Email	8/24/24	Christina Maginnis	Results of 5 year survey appear on website as a dashboard – ADD actual report since that is in the LW management plan as deliverable	Education & Engagement	O	PDF of 5-year baseline survey added to the LWMP website.	
256	Email	8/25/24	Silver Beach Neighborhood Association	We recommend the use of behavioral analysis studies to assess the impacts of human activity within the watershed and to quantify the projected impacts associated with population increases.	Education & Engagement	S	LWMP follows guidance from Department of Ecology to develop behavior change programs. Additionally, we utilize the 5-year survey to reevaluate behavior and perceptions of the watershed and adapt our programming accordingly.	
257	Email	8/25/24	Whatcom Environmental Council	Page 39, Section 9.3.1; Consider changing this to “Animal Waste: Programs that support animal waste pick up at home and in parks.” There are other domestic animals that provide a source of fecal load in the watershed, such as horses, cats, chickens, etc., so they should be considered also.	Education & Engagement	S	Comment considered and changed text to “pet waste”	Changed “dog waste” to “pet waste”.
258	Email	8/22/24	Bob Mitchell, Climate Impact Advisory Committee Member	Program Area 9: Education & Engagement (p. 36) Under Recreation, include education about electric watercraft and maybe include the number of electric boats as a Reporting metric.	Education & Engagement	S	We included education about boating in the recreation section. Also see Section 11.2.6.	



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259	Email	8/24/24	Whatcom Million Trees Project	<p>We suggest adding the following three new statements to section 9.3 Community-wide Education and Engagement with Lake Whatcom Benefit:</p> <p>“Real estate buyer disclosure: By end of 2025, require real estate agents to give to the buyer (before or during the close of a real estate transaction) an easy-to-understand, one-page disclosure that explains certain trees may be protected from removal within the parcel.”</p> <p>“Tree service provider handout: Requiring each tree service provider to give any client within the watershed Develop a one-page flyer/handout that states the watershed's basic tree removal rules and fines.”</p> <p>“Education about tree canopy benefits: Develop an educational outreach program (outdoor signage, webinar, etc.) to watershed residents that highlights the value of trees in the watershed for drinking water quality.”</p> <p>Discussion:</p> <p>As mentioned in our discussion for Program Area 3 above, unauthorized tree removals within Lake Whatcom Watershed create significant canopy loss over time that potentially impacts the Lake's water quality and contaminant filtering capability. Improved regulations can mitigate the actions of a minority of tree service providers. The problem isn't all caused by a few providers, however. Unauthorized tree cutting can stem from a landowner's lack of regulatory awareness. Besides general awareness, there are two key events for landowners where greater awareness and transparency would especially help: (a) when a tree service provider may be hired, and (b) during the close of real estate transactions. That is why we suggest the above additions.</p>	Education & Engagement	P, S	<p>We have added links to community tree program.</p> <p>First two items are policy considerations that we will be forwarded to the Lake Whatcom Policy Group.</p> <ul style="list-style-type: none"> - Real estate buyer disclosure - Tree service provider handout 	<p>Added link to City community tree program in the Education & Engagement resources.</p>
260	Engage Bellingham	8/25/2024	KerriB	<p>Add relevant information from Chapter 9 of the Silver Beach Neighborhood plan and require property owners of all rentals to provide awareness and education to tenants.</p>	Education and Engagement	P	<p>The objectives and actions identified in Chapter 9 of the Silver Beach Neighborhood Plan are addressed within the LWMP with the following exceptions: 1) A Silver Beach Association representative may apply to be on the Water Resource Advisory Board thru the established City application process and/or can attend the Lake Whatcom Policy Group Meetings. (LWPDWO #3); and</p> <p>2) “Fish” related actions are the sole responsibility of WDFW. (LWPDWO #13 & LWPDWA #23)</p>	
261	Engage Bellingham	8/25/2024	Peter Englander	<p>It's crazy that each jurisdiction has a website and provides its own information on the lake. It's not perfectly consistent makes it 3x as hard to understand what's going on with Lake Whatcom. Has there been any initiative to consolidate management of the lake under one</p>	Education and	S	<p>The Lake Whatcom Management Program is a partnership between the three entities. Please refer to the Lake Whatcom Management Program website at www.lakewhatcom.whatcomcounty.org.</p>	



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				jurisdiction? At least consolidate the public face as a partnership between the three entities?	Engagemen t			
262	Email	8/25/24	Whatcom Environmental Council	This plan is very heavy on educational efforts compared to regulatory enforcement, yet nowhere in the document is there a discussion of why that is, and how you know whether education is providing the necessary changes compared to what regulatory enforcement could. In fact enforcement is only mentioned briefly in the draft plan, and only related to the AIS and septic inspection program. How is enforcement used for land use regulations, forest practices, stormwater, recreation, hazardous material use? We think this section should be expanded to include the 3 E's – Education, Engagement, and Enforcement, with a discussion of regulatory enforcement in the watershed, and how decisions are made between increased education and engagement versus focusing on enforcement, versus a combination of the three	Education & Engagemen t, Overall	S	Each program area has different enforcement mechanisms (codes, laws, land use regulations, etc.). This section is specifically about education and engagement. Planning departments and police are the main channels of enforcement and respond to potential infractions.	
263	Engage Bellingham	7/29/24	Northshore Resident	Engage schools and students in habitat restoration work on public land and pay for or provide other monetary incentives and instruction for homeowners to landscape in ways that benefit the watershed.	Education & Engagemen t, Stormwater Managemen t	S	<p>The City has a Parks Volunteer Program that engages schools and students in habitat restoration work citywide, including Silver Beach and Geneva Elementary Schools.</p> <p>Currently, there are rain gardens, native plants, and educational signs at Silver Beach and Geneva Elementary Schools and the Waldorf School in the Geneva Neighborhood. The City of Bellingham also provides self-guided tours and interpretive signage at Bloedel Donovan Park to provide opportunities for field trips. LWMP staff encourages school groups to reach out with ideas for educational partnerships.</p> <p>Section 2.2.3 states, "Encourage the conversion of non-native landscape and lawn to native forested areas and the preservation of forested areas through incentives and permanent conservation agreements with landowners." This currently includes the Homeowner Incentive Program and the Neighborhood Native Landscaping Program.</p>	
264	Engage Bellingham	7/29/24	JHR	Promote educational lake tours through active transportation means, both by land and water.	Education & Engagemen t	S	General Lake Whatcom education is included in Section 9.1. Education and Engagement. Staff will consider this suggestion when planning more detailed outreach.	
265	Engage Bellingham	8/4/24	Dr. John Baker	I notice all the lead people appear to be white. Where is the involvement of the indigenous community and other people of color? Your hiring practices seem to result in white managers. Demographics are changing in Whatcom County region. Diversity strengthens our vision and is the medicine community health and planning require. Dr John Baker, resident	Administrati on	S	<p>The three jurisdictions recognize this to be an issue. The City has added interview questions about diversity, equity and inclusion to all interviews. Additionally, all personal information is redacted from job applications materials prior to review and rankings. Over time we believe these changes will result in a more diversified workforce.</p> <p>Whatcom County is also working on ways to address it. The County has added language to job descriptions describing the importance of the County's commitment to a work culture of equity, inclusion, and respect.</p>	



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							Similarly, the District is an equal opportunity employer.	
266	Email	8/24/24	Mt Baker Group-Sierra Club	Reference is made in this section to “other partners” of the Lake Whatcom Management Program members. Who are the other partners? Where are they identified in the draft?	Administration	S	Please refer to the introduction to the Program Areas and Objectives section, which identifies key partners (Sudden Valley Community Association, Washington State Departments of Ecology and Natural Resources, WWU Institute for Watershed Studies, Whatcom Conservation District, and Whatcom Land Trust).	
267	Email	8/25/24	Whatcom Environmental Council	Page 40, Objective; insert “promote adaptive management of plan implementation,”. Interesting that this work plan never mentions adaptive management, which is an important parameter of plan development and implementation.	Administration	S	We incorporated language on adaptive management in the introduction.	A new section on Adaptive Management was added to the introduction of the work plan.
268	Email	8/25/24	Whatcom Environmental Council	Page 41, 10.3 Work Plans and Reports; this section should reference adaptive management and explain how it is used as part of the management of all components of the plan	Administration	S		
269	Engage Bellingham	8/26/2024	KerriB	Include communication with and where appropriate collaboration with the Silver Beach Neighborhood association.	Administration	S	References to “watershed residents” and “property owners” includes SBNA	
270	Engage Bellingham	8/26/2024	Peter Englander	Would be great if there was more efficient administration than three jurisdictions doing exactly the same thing.	Administration	S	See comment #19	
271	Email	8/25/24	Whatcom Environmental Council	Good management is necessary for the successful implementation of any plan, so management should be described in the plan. Particularly important for a long-term plan such as this one would be the inclusion of how management commits to and monitors continuous improvement. Nowhere in the document is there any discussion of the management of this plan, which would include things such as: <ul style="list-style-type: none"> • How are decisions made and at what levels? • Who is responsible for various management areas? • How is the plan reviewed and approved? • How is cost versus benefit assessed in decision making? • Does a philosophy of continuous improvement and adaptive management exist and drive efforts, and how is that assessed? • How is staffing and funding adequacy assessed? • Who pays for what? • Etc. Please add a discussion of these types of important management considerations and links to where the specifics can be found. It appears this Administration program area should be expanded to Administration and Management to include this type of information.	Administration	S	Information was added to the work plan to address many of these questions.	Added Organizational Structure, History, and Adaptive Management sections.



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272	Email	8/25/24	Whatcom Environmental Council	<p>Add two new sections to 11.2</p> <p>11.2.8 De-incentivize clearcutting on developable parcels. Extend the term of the development moratorium beyond the current six years to a duration consistent with ecological hydrologic maturity.</p> <p>11.2.9 Promote forest management that relies on ecological and ecosystem health as outputs from forest management actions. Promote avoidance of short-duration even-aged harvests on forest resource lands.</p>	Climate Action, Forest Management, Land Use	P, S	<p>To your proposed section 11.2.8: The LWMP does not have the authority to address forestry activities on private parcels or influence the length of development moratoriums associated with forestry actions on private parcels. The Forest Management section addresses public forestry activities and public lands that contain forested areas. To your addition proposed as 11.2.9: this may be germane as it pertains to public forest resource lands, but LWMP partners do not have jurisdiction over the forestry practices overseen by the Department of Natural Resources and/or the Department of Ecology.</p> <p>These specific concerns may be addressed through the ongoing Lake Whatcom Forest Management Plan that will be developed as part of Program Area 12 of the Lake Whatcom Work Plan.</p>
273	Email	8/23/24	RE Sources	<p>11.1.1 Recommendation: COB staff have initiated a process to develop a Climate Vulnerability Assessment (CVA) for Lake Whatcom that looks at how climate change will increase water temperatures and lake stratification, while fostering the growth of AIS and algae blooms. In addition to focusing on internal lake processes, it is essential that this CVA include an assessment of watershed-scale processes that contribute to increased phosphorus loading in the lake.</p> <p>Rationale: Climate change will likely increase phosphorus loading through two primary pathways: Firstly, climate change is increasing the frequency and severity of extreme rainfall events, which will transport large amounts of sediment (including phosphorus) to Lake Whatcom. Secondly, climate change is contributing to hotter and drier summers, which poses forest health challenges and elevates the risk of high severity wildfires in the watershed. If a high severity wildfire occurs, it could lead to major landslide events that transport phosphorus to the lake. The CVA should inform the forest management planning effort that is being led by Whatcom County that will inform forest restoration work on city and county owned lands in the LWW. Partners should include: COB, Whatcom County, WWU, and UW's Climate Impacts Group.</p>	Climate Action	S	<p>The LWMP partners intend to utilize the best available science and conduct a comprehensive assessment of climate impacts on our management strategies as part of the Lake Whatcom Climate Vulnerability Assessment. The CVA will consider all program areas, program management challenges as it relates to a changing climate, and how to adapt to those challenges in the future to reduce negative impacts. The Climate Vulnerability Assessment will consider both increased pollution inputs to the Lake due to climate change and the response of the waterbody under those new pressures. The CVA will also have a focus on forest management and risk management in terms of wildfire prevention and aquatic invasive species (AIS) introduction. All impacts will be considered on a watershed-scale, as you suggest. While wildfire prevention is a key aspect of this Work Plan, that particular strategy is not addressed within the Climate Action in this Work Plan, but is included in the Forest Management section. Climate adaptive forest management practices support both the goals of the forest management section and the climate action objectives, but more closely align with the principles of the forest management section.</p>
274	Engage Bellingham	8/26/2024	Peter Englander	<p>Do an assessment but also live by its recommendations. Don't do it unless you all are serious about changing the management practices to improve resiliency.</p>	Climate Action	S	<p>We intend to utilize the results of the Climate Vulnerability Assessment to guide our development of programs, program funding, projects, plans, and policies in the current, and subsequent, five-year work plans. We will work to include all Lake Whatcom Work Program Areas for evaluation as part of the Climate Vulnerability Assessment and integrate those recommendations into subsequent work plan updates.</p>
275	Email	8/25/24	Whatcom Environmental Council	<p>There are very few specifics about how considering climate change will change management of the lake. Is this because you are awaiting the findings of the Lake Whatcom Climate Vulnerability Assessment? If so, that should be stated, the timeline for completion should be added, and a commitment should be made to amend and update the plan</p>	Climate Action	S	



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				ASAP to include those details once that vulnerability assessment is completed.				
276	Email	8/25/24	Whatcom Environmental Council	Page 38 (& 43), Climate Action; at end of 11.1.2; add “that address climate ready watershed management.”	Climate Action	S	It is unclear what the term “climate ready” means in this context. The current policy language in the work plan commits the Work Program to creating educational materials based on the outcome of the CVA, and that climate vulnerability assessment will help define how “climate ready” is defined in relation to the Lake Whatcom watershed.	
277	Email	8/25/24	Whatcom Environmental Council	Page 43, first paragraph, third line; make the following changes after temperatures, “altered streamflows (higher flows in winter, lower flows in summer and fall), other water quality impairments, and changing rainfall patterns.” Also note that variation in rainfall is an existing attribute of weather and climate; however, climate change includes changes in rainfall patterns not variations, unless you mean increased variability, then say that.	Climate Action	S	The data we have suggests that to this point overall rainfall amounts have stayed within a similar range, but the timing and intensity of those events has changed. Fewer events, with higher intensity, result in a changed pattern of stormwater runoff and associated groundwater recharge and may affect lake turnover. However, streams in the Lake Whatcom watershed are generally short in relative length, on steep gradients, and therefore do not currently have low flow issues to manage. The Climate Vulnerability Assessment will evaluate projected impacts to streamflow, water quality impairment, and changing rain flow in the medium and longer term. These recommendations for additional climate adaptations will be integrated into the Lake Whatcom Work Plan, when finalized.	The text in this program area has been re-written for clarity.
278	Email	8/22/24	Bob Mitchell, Climate Impact Advisory Committee Member	Program Area 11: Climate Action (p.43) I suggest adding something like this to page 44: 11.2.8 Water Conservation: Update water conservation measures to promote the efficient use of lake water as summers get warmer and drier resulting in less runoff and more lake evaporation in concert with higher demand with population growth.	Climate Action	S	Water conservation measures will be considered as part of the City of Bellingham’s Water System Plan Update that will occur during this Work Plan period. In addition to the findings of the Climate Vulnerability Assessment, the recommendations from the Water System Plan Update will inform future actions in this program area. Currently, the City of Bellingham has measured a reduction in water usage, per capita, which is mitigating the increase in population. The City of Bellingham, despite continued growth, continues to see a decline in usage of treated water due to increases in efficiency across the system. Unless a specific risk is identified in the Climate Vulnerability Assessment related to water conservation, we are proposing to organize all actions related to water conservation in the Utilities and Transportation Program Area and add additional climate adaptation strategies, when identified. Similar to the City of Bellingham, the District is also scheduled to update its Water Comprehensive Plan, which includes its Water Use Efficiency Plan, during this Work Plan period. As a leading member of the Whatcom Water Alliance, the District also actively promotes water conservation, both by its customers and countywide. Also like the City, the District has observed a downward trend of per capita consumption over the past decade, despite additional connections, which is largely attributed to measures taken by the District and our customers in conserving water.	



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279	Email	8/25/24	Whatcom Environmental Council	A more thorough treatise on climate change needs to be made. The full spectrum of climate change threats or impacts on the watershed should be identified. Little if any treatise is given in the plan on the cumulative impact of past, present, and reasonably foreseeable future climate change impacts relative to water quantity and quality. Climate change is likely the largest threat to water quantity and quality in the watershed, yet it receives the second lowest funding level during the term of this work plan.	Climate Action	S	We are certainly not intending to diminish the impact of a changing climate on the management of Lake Whatcom. This is the first time, Climate Action has been included in the purview of the Lake Whatcom Management Program, so there are not established baseline metrics associated for climate action in relation to Lake Whatcom. We plan to incorporate the best available science as part of the Lake Whatcom Climate Vulnerability Assessment in order to identify watershed specific adaptation strategies for managing climate impacts to the reservoir. Current actions to mitigate climate impacts, adapt to changing weather patterns, and create resilient public infrastructure was described in detail at the most recent Joint Councils and Commissions Meeting on Lake Whatcom. Nearly all program areas have some nexus with climate action, and those activities will continue or be enhanced through the findings of the Lake Whatcom Climate Vulnerability Assessment to be completed in the next work plan period. Funding for climate action within the local community is not limited to the budgets described in this Work Plan. Both the City and County are implementing Climate Action Plans and incorporating climate change considerations in updates to each agency’s Comprehensive Plan, as required by State Law. The budget described in the Lake Whatcom Work Plan applies only to the development, completion, and dissemination of the Lake Whatcom Climate Vulnerability Assessment and its findings. Future Work Plans (2030+) will then be developed using these findings and actions deemed appropriate will be budgeted for and implemented at that time.	
280	Email	8/25/24	Whatcom Environmental Council	The impacts of climate change on streamflow quantities must be more directly addressed by the plan. This is particularly important regarding the cumulative impacts of climate change and forestry in the watershed.	Climate Action	S	Specific trends and baseline measures for Lake Whatcom and watershed specific projections will be established in the Lake Whatcom Vulnerability Assessment.	
281	Email	8/22/24	Phil Thompson, Climate Impact Advisory Committee Member	<p>My general comment/recommendation is for the workplan to cite appropriate portions of the 2021 Climate Action Plan (you could include the link to the CAP to make things easier for them: https://wawhatcomcounty.civicplus.com/3162/Meetings-Additional-Information) that align with/support elements of the workplan.</p> <p>As one example, since I have worked on both the CAP transportation chapter and the Comp Plan recreation chapter, I can comment on Program areas 6 and 8 of the draft workplan.</p> <p>In program area 6 (recreation) I would point out that workplan item 6.2.3 (Connect trails to other parks, trails, facilities and transportation networks as appropriate) corresponds closely to a key priority for CAP transportation strategy 1 (Expand local and regional trail networks for nonmotorized transportation to create safe active transportation to schools and enhance bicycle and pedestrian commuting infrastructure;</p>	Climate Action, Recreation, Utilities & Transportation	O	<p>As the Lake Whatcom Work Plan is intended as a watershed-specific document, discussion of city or countywide actions related to Climate Action are included if the policy language is directly applicable to Lake Whatcom. Many actions identified in the City and County Climate Action Plans are related to overall climate mitigation, adaptation, or resilience, rather than specific only to this reservoir.</p> <p>For example, while the City of Bellingham is installing electric vehicle chargers at Bloedel-Donovan Park, we are not specifically implementing an EV charging plan for the Lake Whatcom watershed as all areas within Bellingham are part of the overall strategy for EV charging infrastructure. Therefore, there is no mention of EV charging systems in the LWMP Work Plan, even though such infrastructure will be installed.</p> <p>That said, we agree that additional connections between the overall strategy and the watershed-specific actions help describe the ways that the LWMP contributes to the overall goals. We will review the Lake Whatcom Work</p>	Added links to City and County climate action plans in the Climate Action program area resources.



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				<p>see CAP p. 59), as well as to proposed transportation actions 1.1 and 1.3 (CAP p. 63).</p> <p>In program area 8 (Transportation/Utilities) I note that workplan item 8.3 states that watershed residents should be informed and encourage to use alternate transportation modes. This aligns with the same proposed actions 1.1.and 1.3.</p> <p>I think there are similar opportunities to cite the CAP in almost every LWMP workplan program area.</p>			<p>Plan goals and policies for consistency with both Climate Action Plans, incorporate as many direct references as are directly relevant to the watershed actions, and include direct links to both the City and County’s Climate Action Plans, and both Comprehensive Plan climate elements (when available) in the supporting information in the work plan.</p>	
282	Email	8/24/24	Mt Baker Group-Sierra Club	<p>The objective mentions implementing “strategies on forest lands that minimize water quality impacts from harvesting and/or recreational activities while simultaneously managing forested lands to minimize wildfire threats.”</p> <p>More detailed plans are needed, defining these strategies. The draft should also include coordination with DNR regarding timber sales to maximize carbon sequestration and environmental protection, in addition to minimizing wildfire threats.</p>	Forest Management	S	<p>Further details on forest management can be found in individual forest management plans that are site specific, or the upcoming Lake Whatcom Forest Management Plan partnership. Plan-level detail is not included in the -year Work Plan, but is available in the City’s Computerized Maintenance Management Software (CityWorks) as inspections and subsequent work orders.</p> <p>DNR adheres to the Lake Whatcom Landscape Plan which supports TMDL goals for water quality. Coordination with DNR is conducted as part of the Interjurisdictional Committee, a DNR group that meets to review sales and provide feedback and comment on behalf of the LWMP. DNR has protected some mature forests in perpetuity under the Climate Commitment Act. For more information see Climate Action program area.</p>	
283	Email	8/25/24	Whatcom Environmental Council	<p>Page 45, first paragraph; insert “and quantity” after quality.</p>	Forest Management	O	<p>“Quantity” is not included as a TMDL goal.</p>	
284	Email	8/25/24	Whatcom Environmental Council	<p>There are very few specifics about how forest management will change around the lake with the inclusion of this new program area. Is this because you are awaiting the findings of the pending Forest Management Plan? If so, that should be stated, the timeline for completion should be added, and a commitment should be made to amend and update the plan ASAP to include those details once that vulnerability assessment is completed.</p>	Forest Management	S	<p>Correct. Section 12.1.1 mentions implementation of the Forest Management Plan, which will be a large part of this program area.</p>	
285	Email	8/23/24	RE Sources	<p>The county and city should utilize forest management techniques that can increase the wildfire resistance and drought resilience of forests in the LWW. This work should be prominently featured in the County and City of Bellingham’s forthcoming joint Forest Management Plan for reconveyed and other public forest lands.</p>	Forest Management	S	<p>We agree with this comment and will continue our programming in support of this idea as well as incorporation into our forest management planning process. The City and County are currently implementing several techniques to increase wildfire resilience such as thinning, fuels reduction, Home Ignitions Zone assessment, climate adapted seed sources for native plants</p>	



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							and outreach to neighborhoods that have been identified as higher risk areas in the wildland urban interface.	
286	Email	8/25/24	Whatcom Environmental Council	There is no mention of how recommendations from the newly formed Whatcom County Forest Resilience Task Force will be considered or added to the plan, even though that is one of the reasons the Task Force was formed. Please add language acknowledging the task Force, and how the forest plan they are tasked with drafting over the next year will be incorporated.	Forest Management	S, P	Although the Forest Resilience Task Force is in its infancy and still establishing bylaws, there are plans to engage the Forest Resilience Task Force in the planning process with the selected Forest Management Planning consultant. Engagement with the Forest Resilience Task Force is a specific and required step of the forest management process through the Lake Whatcom Forest Management Plan Partnership. Although the Forest Resilience Task Force is built into the management process, it is not necessarily an overall goal and therefore not necessary to state as a “goal” for the 5-yr work plan.	
287	Email	8/23/24	RE Sources	12.1.1 Recommendation: The FMP should include management techniques that enhance forest climate resilience and wildfire resistance. The city and county should interface with the relevant advisory committees as well as the newly formed Forest Resilience Task Force, which will look at forest management from the perspective of climate resilience and carbon storage.	Forest Management	S	These are goals have been included in the RFP solicitation for the Forest Management Plan Partnership. Also see comment # 286.	
288	Email	8/24/24	Mt Baker Group-Sierra Club	Section 12.1.2 requires that the Program “[i]mplement existing city plans for forest thinning to improve structural diversity and health.” What are the existing city plans, and who implement them?	Forest Management	S	Each parcel owned by the City is evaluated for opportunities to make improvements to water quality through restoration or silvicultural applications. Management strategies are unique for each preserve and are usually specific to current conditions and future management needs. These plans are created and updated by City of Bellingham and implemented to promote long-term forest health and mitigate immediate threats of wildfire, pathogen or lack in species diversity/resiliency.	
289	Email	8/25/24	Whatcom Environmental Council	Page 45, 12.1; add in new section “12.1.3 Work with private forest landowners and DNR to extend the rotation age of even-aged harvests to a duration that promotes and protects streamflow quantities and quality, carbon sequestration, as well as ecosystem health.	Forest Management	P	The LWMP partners lack the authority to regulate timber activities on DNR land or private forest lands.	
290	Email	8/25/24	Whatcom Environmental Council	There is minimal reference to the impacts of forest harvest in the watershed on water quality and streamflow. The work plan should explain what analysis has been done related to forest harvest impacts on water quality and quantity, what more needs to be done, and plans to address impacts as identified. Also, the plan needs to make clear the impacts of commercial forestry on water quantity which also affects water quality.	Forest Management	S, P	DNR complies with the Lake Whatcom Landscape Management Plan (LWLMP). The LWLMP was created with research on harvest impacts on water quality and quantity. When Ecology created the Lake Whatcom TMDL, it was acknowledged that the City and County do not have jurisdiction to control Forest Practices in the Lake Whatcom watershed. The LWMP is unable to apply limitations on those activities by law.	



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291	Email	8/24/24	Whatcom Million Trees Project	<p>We suggest adding the following new statement to section 12.1 Forest Management Plans that provides an actionable component to address invasive English ivy which is completely overlooked in this draft report but has major impacts on forest edges around Lake Whatcom, directly impacting stormwater buffering and filtering:</p> <p>“To preserve stormwater-filtering tree canopy, during year 2025 develop and then implement an English ivy removal plan for all public forests around Lake Whatcom.”</p> <p>Reporting metrics:</p> <ul style="list-style-type: none"> • Number of trees in public parcels that are cleared of ivy • Estimate # of trees still impacted by ivy • Cubic yards of ivy cuttings removed <p>Discussion:</p> <p>WMTP has been tracking the prevalence of English ivy on trees in Bellingham and the County. English ivy eventually kills virtually every tree it climbs onto. (Click here to learn more about this threat and WMTP's multiple responses to reduce it.- https://whatcommilliontrees.org/tree-projects/tree-protection/english-ivy/) Hundreds of mature trees in managed (and unmanaged) forests/groves along Lake Whatcom are slowly degrading/dying from it, leading to less forest density and less biodiversity of understory. Both impact the water and contaminant natural filtering capability of the watershed.</p> <p>In public lands around Lake Whatcom, English ivy tends to grow along trail and road edges, such as in and around Lake Whatcom Park (especially on the Hertz trail) and in many areas of Sudden Valley, and in and around residences in the Sehome and Silver Beach neighborhoods</p>	Forest Management	S	City of Bellingham and Whatcom County manage their properties for ivy as well as other invasives. English Ivy will also be evaluated as part of the development of the forest management plan.	
292	Engage Bellingham	8/26/2024	KerriB	<p>Add a plan for removing invasive species that are impacting forested areas including private property.</p>	Forest Management	S	City of Bellingham manages for ongoing invasive removal and control on all preserves within its capacity. Major efforts in invasive removal on LWLAPP properties to remove invasives and restore with native plants have been underway since 2014. Whatcom County's Noxious Weed Program regulates invasive species on private land in accordance with the state noxious weed list and does offer outreach and assistance to private landowners. It is anticipated that invasive species will be evaluated as part of the development of the forest management plan.	



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293	Email	8/24/24	Mt Baker Group-Sierra Club	<p>Section 12.2, “Forest Practices Review,” require “[r]eview and comment on Washington State Department of Natural Resources (DNR) and private forestry activities to minimize adverse water quality impacts.”</p> <p>We strongly urge you to broaden this to include elimination of “legacy forests” from timber sales and minimization of unnecessary loss of non-legacy or old-growth forests providing the greatest carbon sequestration. Keeping these forests in the watershed intact will greatly enhance erosion and fire control.</p> <p>Land preservation plans should encompass all forested areas in the watershed zone, including private and public (DNR) acreage. Clear cutting in the watershed must be prohibited to protect the ecosystem on which Lake Whatcom depends for health. Scientific study and metrics are needed to ensure that the plan is actually achieving defined goals.</p> <p>We also urge you to add to sections 12.2.1 – 12.2.3 the monitoring and support of county efforts to stay timber sales in the watershed until a coordinated approach can be agreed on with DNR.</p>	Forest Management	P	<p>The LWMP partners lack the authority to regulate timber activities on DNR land or private forest lands. We are unable to apply limitations on those activities by law. Additionally, the Lake Whatcom TMDL study takes this into account and removes the forestry contribution of runoff to the Lake from the responsibilities of the jurisdictions. This is a condition of land use regulations in Washington State and LWMP jurisdictions cannot impose additional restrictions on forested land using local codes or requirements. What we can do is purchase this property if it comes up for sale, or as done under the previous work plan, acquire large tracts of forested land through easements or reconveyance procedures. The Lake Whatcom Reconveyance brought over 8,000 acres of timber land under LWMP control for preservation and protection. The Galbraith Mountain Recreation Easement included permanent protection for another 1,200 acres in the watershed.</p>	
294	Email	8/23/24	RE Sources	<p>12.2.3 Suggested Language: “Track and publicly report permitted forest practice activities (including harvests, replanting, road building and abandonment, and herbicide spraying)”</p> <p>Rationale: Instead of just “track” forest activities, it should be “track and publicly report” so that elected officials and the public are aware of these activities.</p>	Forest Management	S	<p>LWMP has been reporting these metrics previously under “Land Use” section and will continue to report in the Forest Management section. We agree with the suggestion to add the word “report.”</p> <p>This information is also publicly available on the DNR FPARS website.</p>	Added “and publicly report” to Section 12.2.3
295	Email	8/24/24	Whatcom Million Trees Project	<p>We suggest adding the following new statement to section 12.2 Forest Practice Review: “By end of 2025, build in opportunities for key local stakeholders to present substantive comments/feedback when DNR forestry activities in the watershed are reviewed.”</p> <p>Discussion:</p> <p>Feedback by key watershed stakeholders (i.e. local nonprofits like Re Sources, Whatcom Million Trees Project, Sierra Club; tribes; and others) should not be limited to individual public forum feedback time limits. Often stakeholders have detailed and substantive comments to offer. This should be encouraged and formalized in some way in all local review processes that impact the watershed.</p>	Forest Management	S	<p>Review of FPAs is not under the jurisdiction of the LWMP; however, DNR does accept public comment on FPAs.</p>	
296	Engage Bellingham	7/26/24	Tom Smith	<p>I understand that there will be much more development of this section, but I noticed that there is a lack of metrics assigned to Forest Roads. Stormwater runoff from forest roads and the distribution of</p>	Forest Management	S	<p>The City and County have an upcoming analysis of roads in the Lake Whatcom Forest Management Plan partnership for City and County-owned lands, which will include recommendations on City and County forest roads.</p>	



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				that runoff through ditches and cross drains is well documented as a contributor to stream water quality impacts. Poorly constructed and/or poorly maintained forest roads, ditches and culverts have contributed to stream turbidity, sediment transfer, and landslides. The draft plan references road maintenance and abandonment, but there are no metrics involving road inspections, maintenance or abandonment actions.			Forest roads owned by other agencies or on private property are regulated by the state (DNR RMAP).	
297	Email	8/24/24	Mt Baker Group-Sierra Club	Section 12.3.1, "Forest Roads" says: "Maintain and abandon city and county-managed forest roads using recommendations from the upcoming Lake Whatcom Forest Management Plan." We strongly encourage that the Forest Management Plan consider maintenance and abandonment of roads from the perspective of effect on water quality. The "Reporting Metrics" section should reflect the metrics that would be used to measure water quality impacts.	Forest Management	S		
298	Email	8/24/24	Mt Baker Group-Sierra Club	One of the "Reporting Metrics" for this Program Area is "[a]cres of timber harvested and replanted on forest lands per year." "Replanting" can be variously defined, especially when it comes to density of vegetation being replanted. There should be detailed metrics standardizing the character and function of adequate replanting. (Adequate to the needs of the forest and lake, not to the demands of the timber industry.)	Forest Management	S	This is outside of LWMP jurisdiction. This reporting metric is based on the specifications that private/commercial foresters follow through Forest Practices required by the state for replanting.	
299	Email	8/25/24	Whatcom Environmental Council	Page 38 (& 46), Forest Management, 12.4.1; after mitigation insert "and promote climate resilience"	Forest Management	S	Comment incorporated as suggested.	Added "and build climate resilience" after "mitigate" to Section 12.4.1
300	Email	8/23/24	RE Sources	12.4 Recommendation: The 2025-2029 Five Year Work Plan for the Lake Whatcom Management Program should include the development of an "Interjurisdictional Wildfire Response and Prevention Plan" that helps DNR, local fire districts, COB, and Whatcom County coordinate wildfire prevention, response, and recovery in the LWW. Rationale: At this year's Annual Lake Whatcom Joint Councils Meeting, Executive Sidhu said, "The biggest risk to the Lake Whatcom watershed is the risk of a catastrophic fire." In 2023, there were four fires in the watershed, with the Blue Canyon Fire burning roughly 40 acres. Climate change will continue to bring hotter and drier summers, which will inevitably lead to more wildfire activity in the Lake Whatcom watershed. A clear wildfire response plan should be developed to identify how fires in the LWW will be responded to, especially in scenarios when fire crews and equipment are busy fighting other fires. Additionally, it is	Forest Management	S	We agree that wildfire risk is an increasing threat. There is a Whatcom County Wildland Fire Action Plan that addresses wildfire response county-wide.	Added link to Whatcom County Wildland Fire Action Plan in the Forest Management resources section.



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				<p>essential for this plan to determine which retardants can be used, to ensure that retardants with toxic chemicals (i.e. PFAS) don't end up in Bellingham's drinking water.</p> <p>The plan should include an emergency outreach plan to reach residents in the event of a wildfire</p>				
301	Email	8/23/24	RE Sources	The work plan should outline existing strategies that increase awareness about wildfire risk and prevention, and identify additional opportunities.	Forest Management	S	The work plan currently reports on implementation of the Wildfire Risk Reduction program carried out by City of Bellingham and Whatcom Conservation District. This includes outreach metrics and Home Ignition Zone treatments that happen annually. Whatcom County also contracts with the Whatcom Conservation District to implement the Firewise program county-wide. These are not specific LW TMDL goals, but we aim for resiliency and adaptation to protect the forests we're relying on to provide clean & safe drinking water.	
302	Engage Bellingham	8/18/2024	lbw	Given the risk of a catastrophic fire in the watershed, much more attention needs to be paid to a wildfire prevention and response plan.	Forest Management	S	We recognize this risk and are addressing it by efforts such as the Wildfire Risk Reduction program and specific sections that in the upcoming Lake Whatcom Forest Management Plan Partnership Plan.	
303	Email	8/23/24	RE Sources	12.4.2 Recommendation: In addition to wildfire risk reduction through education on firewise landscaping, home hardening and prevention, education around emergency response and public safety should be addressed through development of an emergency outreach plan.	Forest Management, Education & Engagement	S	<p>Home hardening is being addressed in the Wildfire Risk Reduction program put on by City of Bellingham and the Firewise program supported by the County. This assistance is available anywhere in the Lake Whatcom watershed.</p> <p>There is a Whatcom County Wildland Fire Action Plan that addresses wildfire response county-wide Emergency response information is carried out by the Division of Emergency Management and we are looking at incorporating this idea into our next work plan.</p>	Added link to Whatcom County Wildland Fire Action Plan in the Forest Management resources section.
304	Engage Bellingham	8/26/2024	Peter Englander	12.4 Wildfire risk and mitigation is the most important action to take. And please engage with indigenous experts on this. They have experience since time immemorial and us colonial settlers have only been disastrous in our practices.	Forest Management	S	We will look into this.	
305	Email	8/23/24	RE Sources	The city, county, and Whatcom Conservation District should work together to promote firewise landscaping and home hardening in the LWW.	Forest Management	S	The City of Bellingham and Whatcom County each have contracted Whatcom Conservation District for the last four years to provide Wildfire Risk Reduction programming and will be renewing those contracts in 2025.	



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306	Email	8/24/24	Whatcom Million Trees Project	<p>We recommend the following objective be included in section 12.4 Wildfire Preparedness and Risk Assessments:</p> <p>“By end of 2025, work with Whatcom Conservation District and others to encourage and publicize a modified Firewise approach for homes in Lake Whatcom watershed that reflects the latest wildfire resiliency science and balances the need to also preserve mature tree canopy and other non-lawn landscape to filter/buffer stormwater runoff.”</p> <p>Discussion:</p> <p>WMTP has been very active at a State level over the past two years regarding home wildfire resiliency. We have been working to improve policymaker's understanding of the latest wildfire resiliency science of top researchers in the nation (Chad Hansen, Dominick DellaSalla, etc.). And at a local level, we've brought the film Elemental: Reimagine Wildfire to multiple venues to supplement Whatcom Conservation District's fine work in our community to improve wildfire resiliency. The bottom line is the latest wildfire resiliency science presents a much more nuanced model of what should be done in and around structures in the coastal Pacific Northwest than the "standard" national Firewise model of removing virtually all tree canopy within 30 feet of a structure, and extensive canopy up to 100 feet away. The latest research shows that in Pacific Northwest coastal conifer-dominant forest areas the standard Firewise approach is a counterproductive strategy. It should instead focus on simple, inexpensive home hardening steps (most important), ladder fuel elimination under nearby trees, and reducing all flammables in the landscape within 5-10 feet of a home. The standard Firewise model is at odds with retaining mature tree canopy to filter and buffer runoff into Lake Whatcom. It also conflicts with numerous State climate and environmental goals.</p> <p>WMTP's work on this issue led to the passage during 2024 of SB 6120 which corrected 2018 wildfire resiliency legislation that led to the WA State Building Code Council creating ill-conceived landscape buffer rules. Our work also has led to a re-do of inaccurate wildfire risk mapping that was created by DNR (should have been fuel-based, not proximity-based).</p> <p>As a result of SB 6120, local jurisdictions can decide the extent of wildfire resiliency requirements for new homes. With that in mind, the LWWP should develop with applicable local agencies, non-profits, and fire marshals a more balanced "modified" Firewise landscape buffer approach that is then publicized to all Lake Whatcom watershed residents.</p>	Forest Management	S	Thank you for your comment. We'll explore the latest science with our consultant.	
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307	Email	8/23/24	RE Sources	12.1 The 2025-2029 LW 5 Yr Work Plan should include an evaluation and update of the Lake Whatcom Landscape Plan. The Forest Resilience Task Force should be consulted in this process.	Forest Management	P	Comment forwarded to the Lake Whatcom Policy Group for consideration	
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