

To:

Ms. Burns: Habitat and Restoration Manager

Mr. Janiszweski: Parks Operations Manager

Mr. Nabbefeld: Development Services Manager

Mr. Linville: Life Safety Division Chief

City of Bellingham

210 Lottie Hall, Bellingham WA. 98225

Transmitted Via Email to: ufmp@cob.org

RE: Draft City of Bellingham Urban Forestry Plan

15 May 2024

Dear Ms. Burns, Mr. Janiszweski, Mr. Nabbefeld, and Mr. Linville,

Thank you for taking the time to consider our comments on the Draft Urban Forestry Plan (the Plan). We thank the City for choosing the more ambitious and protective goal of growing a 45% canopy cover in Bellingham. Bellingham's current 40% canopy cover is on par with many other cities in western Washington and we feel the higher 45% canopy is warranted, aspiration, yet feasible.

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We mobilize people in Northwest Washington to build just and thriving communities and to protect the land, water and climate on which we all depend. Our priority programs include Protecting the Salish Sea, Freshwater Restoration, Climate Action, and Fighting Pollution—all critical issues affecting our region. Our North Sound Waterkeeper is also a member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has thousands of supporters in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

As discussed in the draft Plan, mature trees are the cheapest and easiest trees to maintain on the landscape because the very young and the very old require much more maintenance and resources to grow and maintain. Mature trees are also the work horses in regards to the ecosystem functions they perform; they are simply the best at carbon sequestration, heat mitigation, water filtration and absorption. ***We would like to see specific, concrete actions in the Plan that address mature tree retention.*** Addressing this need immediately (quickstart) will ensure that mature trees are not lost carelessly before other regulations are put into place. Financial incentives followed by strong regulations need to be put in place soon to make sure that these trees stay alive and thrive. Replacing

a grove of old and mature trees with a grove of saplings as premitigation, which is commonly done, will be a net loss of ecosystem function for the near future.

We agree with the overall messaging and goals of the Plan but are concerned that the language is vague and susceptible to different interpretations. ***We would like a “quickstart” in the implementation of strong language to support this plan in the Land Use Plans (ie Comp Plan) and City Codes and Standards (ie Land Use Development Codes).*** The success of this plan is dependent on these crucial plans as they will create accountability. We understand that this process is intended to occur in the future and look forward to seeing strong Urban Forestry Plans woven into other overarching plans soon.

We can build houses and grow our urban canopy simultaneously. As Bellingham’s population grows, it is essential to promote density and infill while strategically protecting and restoring the city’s canopy cover. Skilled urban foresters and developers can find unique solutions to make sure that the infilling retains existing trees and forests. ***If done right, infill can provide affordable housing opportunities that allow our community to grow while protecting urban canopy as well as surrounding farmland and forests.***

We agree that a focused effort needs to be made in areas with lower tree equity scores such as Roosevelt and City Center neighborhoods. Average canopy cover across different neighborhoods does not provide the whole story, however, we need to look at areas within neighborhoods such as low income housing complexes and neighborhoods throughout the city that are often depauperate of trees. ***We encourage the city to use a finer lens than the Urban Growth Boundaries and the Neighborhood Boundaries to determine the most needed areas for planting trees.*** Other areas to consider are bus stops, popular walking and biking routes, and areas with dense housing.

Additionally, ***we believe it's important for neighborhoods within the Lake Whatcom watershed to be targeted for additional tree planting, as increased canopy cover will help mitigate phosphorus loading into the lake.*** We understand that the city and county have canopy cover requirements within the watershed, however, these rules relate to *removal of existing canopy* and do not address the need to proactively plant additional trees in city neighborhoods in Lake Whatcom watershed.

Cross programmatic integration and creativity can also be implemented into the Plan more. ***Strategic development and restoration can have multifunctional benefits***, for example, a stormwater park that is encircled by trees can filter stormwater, provide valuable habitat, create canopy cover, and provide places for people to gather and enjoy being outside. Other types of green infrastructure such as rooftop gardens, bioswales, food forest, and stormwater trees can also be multi purposeful.

Fostering collaboration and partnerships with diverse groups in Bellingham could help to elevate and expedite this work and we are glad that this is one of the goals of the Plan.

This includes environmental groups, developers, tribal members, and other community members. Person to person rapport and trust must be built to develop these relationships, however, especially with the tribes. ***We hope that the City invests the necessary time and resources to develop these partnerships and relationships.*** A potential strategy is to hire a tribal liaison that can help pave the way for meaningful dialogue between the Tribes and City with this Plan as well as other City work.

We applaud the City for creating this road map to build Bellingham's Urban Canopy up to 45% and we are hopeful that the necessary incentives, regulations, and collaboration will be put in place to make this a reality. Thank your for providing several opportunities for community members and organizations to review and comment on this draft Plan.

Sincerely,

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