

To: Whatcom County Council
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CC: Whatcom County Executive, Whatcom County PDS

Transmitted Via Email to: 2025Update@co.whatcom.wa.us, council@co.whatcom.wa.us,
executive@co.whatcom.wa.us

June 12, 2026

RE: Proposed Comprehensive Plan Amendments relating to Cherry Point UGA

Dear Councilmembers,

Thank you for the opportunity to comment on the proposed amendments under consideration at the Tuesday 6/16 Special Committee of the Whole meeting. We are particularly interested in providing our feedback and recommendations on the proposed language related to the Cherry Point UGA in Chapter 2 (Land Use).

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 Baykeeper is 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 county, and we submit these comments on their behalf:

Involvement in 2016-2021 Cherry Point Amendments Process

On July 27, 2021, the Whatcom County Council unanimously approved the Cherry Point amendments after a multi-year process consisting of many council sessions, public hearings, and ultimately an extensive stakeholder process involving representatives from Cherry Point industry, and environmental groups with Tribal consultation— in which RE Sources was deeply involved. Through this thorough, intentional, and collaborative process our community put forth enduring amendments intended to support environmental protections, honor and uphold Treaty rights, and provide more predictability for industry. Like any product of a collaborative and consensus-seeking process, the Cherry Point amendments are not perfect, nor are they exhaustive, however they are stronger and more durable as a result of the collaborative process that brought them about.

Concerns about handling of Cherry Point updates during the 2025 Comprehensive Plan Update Process

If we are going to revisit the Cherry Point amendments, we need to do it right: through a process of stakeholder engagement preceding introduction of new amendment language, to allow adequate time for each involved party to articulate their priorities, engage one another, and find consensus.

One key perspective has been missing from the recent back and forth over Cherry Point-related language— further highlighted by the Comprehensive Plan comments submitted on behalf of Lummi Nation, which include the following recommendation to:

“Require Tribal Consultation for any proposed changes to comprehensive plan growth management policies, regulations and approved activities in the Cherry Point Industrial UGA to protect treaty rights, usual and accustomed fishing areas, right to habitat protection, cultural properties and culturally sensitive areas.”

Any viable conversation around the Cherry Point amendments **must** include the voice of its original stewards— the most crucial and foundational in the conversation around the future of [Cherry Point \(Xwe’chi’eXen\)](#).

We understand that there may be real concerns, gaps, or updates to be made while preserving the original intent of the amendments. But if we want durability, clarity, predictability, and trust to inform any changes made, we **must** do it in a way that channels the collaboration, compromise, and good-faith conversations that shaped the intent of the stakeholder table conversations of the original Cherry Point Amendment process.

We believe the cleanest and most prudent approach at this point in the process is to roll back **all** of the Cherry Point-related amendments put forth following the council’s reception of the *Final Planning Commission Recommendations* version of Chapter 2 Land Use.

Recommendation

RE Sources strongly recommends that Council bring this process back in line with the spirit of the original Cherry Point Amendments process, starting with reverting the Chapter 2 Land Use language related to Cherry Point UGA to the 01.22.2026 Planning Commission Final Recommendations version, which would effectively:

- **Withdraw the remaining preliminarily approved council amendments** related to the Cherry Point UGA section of Chapter 2 Land Use that have not yet been withdrawn, including:



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- Edits to Policy 2CC-16 (#146, #147)
- New Policies 2CC-19, 2CC-20, 2CC-21 (#168-#172)
- **And by extension, reject proposed council amendments** related to the Cherry Point UGA section of Chapter 2 Land Use that have not yet been approved, including:
 - Proposed amendments to New Policy 2CC-20 (#177) and New Policy 2CC-21 (#178)

Thank you for your consideration of our comments. Please don't hesitate to contact us with any questions at kaiah@re-sources.org, heatherwl@re-sources.org or anderr@re-sources.org.

Sincerely,

Kaia Hayes - Land & Water Policy Manager, RE Sources

Heather Witzel Lakin - Resilient Infrastructure Policy Manager, RE Sources

Ander Russell - Co-executive Director, RE Sources