3.10 AESTHETICS/LIGHT AND GLARE

The aesthetics/light and glare section illustrates and describes (through photographic simulations) the existing aesthetic conditions of the site and the surrounding area. Illustrations of the visual conditions that could result from redevelopment under the EIS Alternatives are provided from representative view locations. An emphasis is placed on potential impacts to views of the redeveloped New Whatcom site, including views of this site from surrounding residential and commercial areas and key scenic and recreational sites (**Appendix K**, Aesthetics Technical Appendix, contains discussion on the methodology employed for the visual analysis). Existing light and glare conditions are described and potential light and glare impacts are evaluated.

3.10.1 Affected Environment

Aesthetics

Site Character

The general visual character of the site is varied, reflecting large expanses of mostly paved vacant area interspersed by areas of industrial building development; approximately 72 percent of the site is vacant (does not contain buildings). In general, the visual character of the site transitions from highly developed area with numerous buildings in the eastern portion of the site (Areas 1, 2, 3 and 4) with fewer buildings and more vacant area to the west (Areas 8, 9 and 10).

Area 1, north of the Whatcom Waterway, contains the largest concentration of buildings on the site, including the large tissue warehouse building and numerous smaller industrial and office buildings. Georgia-Pacific (GP) operations in Areas 2, 3 and 4, south of the Waterway, also contain a high concentration of buildings; the majority of the buildings in this area are brick-clad and reflective of previous mill activities. Areas 5, 6 and 7, comprising the southern portion of the site, consist of large amounts of vacant area; buildings are reflective of industrial/warehouse use and utility use at the Encogen facility. Areas 8, 9 and 10, comprising the western portion of the site, contain fewer buildings and large expanses of undeveloped vacant area. A portion of the Burlington Northern Santa Fe (BNSF) railroad corridor runs through the site between Areas 2 through 9 and provides a physical separation between these areas of the site. For further details on existing land uses and buildings on the New Whatcom site please refer to Section 3.7, **Land Use**.

The site is located along Bellingham Bay and the visual character of the site is reflective of an industrial waterfront. The majority of the site's shoreline is developed with bulkheads and piers, with large vessels periodically mooring at the site. Over-water features include: a bulkhead/wharf that runs along the north and south sides of the Whatcom Waterway, along the edges of Areas 1, 2, 3, and 4; bulkhead/wharf features along the I and J Waterway on the north edge of Area 1; and, over-water piers associated with the Bellingham Shipping Terminal in Area 9. Natural shoreline is present along a small portion of Areas 8, 9 and along a majority of Area 10.

In summary, the aesthetic character of the site can be characterized as an underutilized maritime industrial area reflecting historical industrial and maritime uses. The site is almost

entirely covered with impervious surfaces. The following summarizes the general visual and aesthetic characteristics of the site by Area.

Redevelopment Area 1 – The visual character of Area 1 reflects ongoing industrial operations of the area. This area contains the greatest concentration of buildings including the GP Tissue Warehouse and other light/marine industrial use buildings. A total of 12 buildings are located in Area 1. The majority of the buildings in this area are single story buildings with the tallest being approximately 50 feet in height. Buildings in this area are primarily constructed of concrete and steel. The shoreline areas, including the I and J Waterway and Whatcom Waterway, are developed with bulkhead and wharf features reflective of the past maritime industrial character.

Redevelopment Area 2 – Area 2 primarily consists of hardscape paved surfaces with six buildings located along the northern and eastern edges. These primarily brick-clad buildings were used for previous mill operations on the site and reflect an industrial character. The buildings are currently vacant or will be vacant subsequent to GP's termination of all activities onsite. Building heights in this area range from one to three stories. The portion of this area adjacent to the Whatcom Waterway is developed with bulkhead and wharf features, reflective of the past maritime industrial character.

Redevelopment Area 3 – Area 3 is a sparsely developed area which contains a large percentage of hardscape impervious surface and two primarily brick-clad structures formerly used by GP. The buildings are currently vacant and have an industrial character reflective of the past industrial mill operations. The buildings are three and six stories in height respectively. The portion of this area adjacent to the Whatcom Waterway is highly developed with bulkhead and wharf features, reflective of the past maritime industrial character.

Redevelopment Area 4 – The visual character of Area 4 also reflects past industrial use. A majority of the area is made up of hardscape impervious surface; three primarily brick-clad buildings are located in this area, and are reflective of the past industrial mill operations. The buildings range from two to three stories in height. The portion of this area adjacent to the Whatcom Waterway is highly developed with bulkhead and wharf features, reflective of the past maritime industrial character.

Redevelopment Area 5 – The visual character of Area 5 reflects an industrial and office environment. A large portion of the area is contained in hardscape impervious surface. Two industrial/office buildings are located on the eastern and western edges of the area, one of which is vacant, while the other is currently used as office space. These buildings range from one to two stories in height and are primarily constructed of concrete and wood.

Redevelopment Area 6 – Area 6 contains buildings and structures associated with the ongoing PSE Encogen facility and are reflective of intensive utility uses with several single-story metal buildings and over-head transformer facilities. A majority of this area is also in hardscape surfaces.

Redevelopment Area 7 – Area 7 is a relatively vacant area that consists primarily of hardscape surfaces. One single-story metal-sided warehouse building is located in this area and supports ongoing warehouse activities.

Redevelopment Area 8 – Area 8 is currently vacant and is entirely in paved parking and other impervious surfaces. The shoreline portion of this area was developed as a former log pond area reflective of previous industrial use, and currently contains natural beach features.

Redevelopment Area 9 – The visual character of Area 9 is reflective of ongoing industrial shipping operations. The area contains the Bellingham Shipping Terminal along with Port of Bellingham office and maintenance buildings and two warehouse buildings. All of the buildings in this area are single-story buildings and are primarily constructed of concrete and metal. The majority of the shoreline edge of this area adjacent to Bellingham Bay is in bulkhead, wharf and pier reflective of maritime industrial operations.

Redevelopment Area 10 – Area 10 is a primarily vacant area consisting of paved surfaces and vegetated areas. Buildings in this area are reflective of past industrial operations and include five buildings associated with the past RG Haley Wood Products operation. These buildings range from two to three stories in height and are primarily constructed of concrete and wood. The majority of the shoreline area is undeveloped.

Adjacent Aquatic Land – These areas consist primarily of the existing Aerated Stabilization Basin (ASB) and other aquatic areas adjacent to the New Whatcom site.

Area Context

The visual character of the area surrounding the site is varied. The visual character of the Central Business District (CBD) to the east is reflective of a downtown core with numerous mid-rise buildings (5-10 stories) and surface parking lots, with the Lettered Streets neighborhood to the northeast reflecting the visual character of a mixed area with low-rise commercial/industrial buildings interspersed with residential buildings. The area to the north, across the I and J Waterway, reflects the visual character of mid-rise mixed use buildings and marina use. The visual character of the area to the south is defined by residential and commercial buildings of varying heights and vegetated open space. The visual character of the area to the west is defined by Bellingham Bay.

More specifically, the visual character of the area to the immediate north of Area 1, beyond the I and J Waterway, is defined by the industrial, marine, recreation and commercial uses along the Squalicum Marina. Included in this area is the Bellwether on the Bay three-story mixed use development that includes hotel, office, restaurant and retail uses. Several parks and trails are also located in this area including the Inner Harbor Promenade, which follows the perimeter of the Squalicum Marina. The area further north and northeast of the site, across Roeder Avenue and on top of the bluff, includes single family and multifamily residences, many of which have views of the New Whatcom site and Bellingham Bay.

The visual character of the area to the east of Area 1, in the Lettered Streets neighborhood is defined by the BNSF railroad corridor and industrial, multifamily residential and office/commercial uses located on the hillside along W Holly Street; a number of these residences and buildings have views of the site and Bellingham Bay. Single family and multifamily residential uses are located farther east in this area. The Whatcom Museum of History and Art, located to the east of the site near the head of the Whatcom Waterway, is a visually prominent feature in the area; this approximately eight-story brick building with a pitched red roof provides public views to the site and Bellingham Bay.

The CBD area to the east of Areas 2 and 5 is considered to be the dominant cultural, civic, financial and service center for the community and is the primary commercial activity center and destination location for the City and Whatcom County. This area contains a visual character reflective of a downtown core that includes a variety of office, commercial, mixed use and multifamily buildings interspersed with surface parking areas. A majority of the buildings are low-level structures (two- to four-story); however, this area does include several taller structures including a 14-story commercial office building (located on W Champion Street), a nine-story mixed use building (located on Cornwall Avenue), an eight-story mixed use building (located on W Champion Street), a seven-story commercial office (located on N State Street), a six-story office building (located on Bay Street) and a five-story commercial building (located on Cornwall Avenue). Buildings in this area are typically older and are reflective of the various commercial uses found in the CBD. Certain buildings in this area contain views of the site and Bellingham Bay; however, due to the intense, urban nature of existing development, a majority of views toward the site and beyond are obstructed by existing buildings. Two new mixed use residential towers are also planned in this area in the near future; the Bayview Towers, a 23-story building (located on N State Street) and 1010 Morse Square, an 18-story building located on (Maple Street) (refer to Section 2.9 of **Chapter 2** for further information on these projects). See the **Indirect/Cumulative Impacts** discussion of this section for further details on these planned developments.

The visual character of the area to the south of the site is defined by vegetated open space, low level commercial buildings and single family and multifamily residences. Immediately adjacent to the site is a vegetated bluff that includes the South Bay Trail. At the top of this bluff area are primarily multifamily residential buildings typically three to five-stories in height; a number of these residences along Boulevard Street and N State Street have views of the site and Bellingham Bay. Single family and multifamily structures are located farther to the south in this area, along with the Western Washington University campus.

Views To and From the Site

The general character of views to the site from the north is largely dependent on elevation. Views to the site from the immediate north are limited to buildings and shoreline features on Area 1; this is primarily due to the close proximity of this area to the site and the lack of elevation. Higher elevation areas located farther north and northeast from the site, beyond Roeder Avenue and on top of the bluff, can have broad, panoramic views of the site and surrounding area. Because of the distance of the New Whatcom site from many of these viewpoints the site comprises only a portion of the overall view corridor. The view looking west and south from this area can generally include the buildings on the site, Bellingham Bay, the Squalicum Marina, and buildings in the South Hill neighborhood. Refer to the **Impacts** discussion below for photographic views to the site from selected viewpoints.

Views from the CBD and Lettered Streets neighborhoods to the east vary depending on location due to topography and the presence of intervening buildings. From these areas to the east, the site comprises a portion of the view to the west and includes buildings, the tops of buildings, and paved areas; depending on the location and elevation, views of Bellingham Bay and Lummi Island are also available. Views from the northern downtown area (near Maritime Heritage Park) also include views down the Whatcom Waterway corridor, in addition to the site. Due to the dense nature of development in the CBD, existing views of the site and Bellingham Bay can be obstructed by existing buildings and structures. Refer to the **Impacts** discussion below of this section for photographic views to the site from selected viewpoints.

The general character of views to the site from the south also varies, primarily due to topography, existing vegetation and buildings. Looking north from this area, views of buildings and structures on the site are available, along with views of Bellingham Bay. Additional views of the Columbia Neighborhood to the north are also available depending on the location and elevation. Higher elevation points in this area, farther to the south, can have broad panoramic views of the site, Bellingham Bay and the downtown CBD. Portions of existing views towards the site are obstructed due to vegetation, particularly along the South Bay Trail. Refer to the **Impacts** discussion below of the section for photographic views to the site from selected viewpoints.

Light and Glare

Site Lighting

Current lighting conditions on the site are indicative of the primarily vacant and under utilized industrial environment. However, portions of the site are occupied by buildings, activities and operations that emit light including: pole-mounted lights and exterior building lights associated with the GP mill (Areas 2, 3, 4, 8), pole-mounted lights within the paved area associated with the Bellingham Shipping Terminal in Area 9, pole-mounted lights and exterior building lights associated with industrial uses in Area 1, and security lighting associated with the PSE Encogen facility in Area 6. Other sources of light on the site include pole-mounted lights along site roadways (including C Street, F Street, Hilton Avenue and Cornwall Avenue). There are no existing sources of light in Areas 7 or 10.

When viewed from surrounding areas, existing nighttime lighting on the New Whatcom site is generally at lower levels when compared to surrounding areas, particularly the adjacent CBD to the east. The level of light on the site is generally similar to that associated with other industrial/commercial areas to the north and northeast of Area 1.

Existing lighting near the shoreline of the site is limited and is primarily comprised of interior and exterior building illumination and lighting associated with operations at the Bellingham Shipping Terminal in Area 9.

Surrounding Area Lighting

Generally, the surrounding streets and neighborhoods in the area produce steady amounts of light throughout the night consistent with an urban environment. The lighting character of the area to the north of the site is dominated by street lighting, vehicular lighting, marina lighting for the Squalicum Marina and exterior and interior building lighting associated with the commercial and industrial uses. Street lighting and residential building lighting are prominent farther to the north and northeast.

The lighting character of the area to the east of the site is dominated by street lighting and building lighting in the CBD. The CBD contains the highest concentration and intensity of building and street lighting in the area and produces a steady amount of light throughout the night, consistent with a downtown urban environment. The area is made up primarily of office, commercial and mixed use buildings. Lighting sources associated with these uses include interior and exterior building lighting, illuminated building signs, and parking lot lighting; street lights and vehicle headlights are also prominent in the area.

The lighting character of the area to the south of the site is indicative of primarily residential uses. The area itself is comprised primarily of single family and multifamily residential uses with some commercial uses. Lighting sources associated with these uses include interior and exterior building lighting, street lighting and vehicle lights. Illuminated building signs are also associated with some of the commercial uses.

Existing Glare Conditions

Existing buildings and vehicles traveling on the site currently generate limited glare. In the vicinity of the site, the primary sources of glare are buildings (including glare from windows and building materials) and automobiles on area roadways. Because of the high concentration of buildings and automobile traffic in the CBD, this area contributes the largest amount of glare in the area. Buildings and automobile traffic in the Lettered Streets neighborhood to the northeast of the site also generate glare. Reflection off the water in Bellingham Bay is also a source of glare.

3.10.2 Impacts

This section describes changes to the aesthetic character of the built environment and light and glare conditions that could occur under the EIS Alternatives. As described in **Chapter 2** of this Draft EIS, Alternatives 1 through 3 assume a similar mix of land uses but with varying densities and maximum buildings heights. Alternative 1 assumes the highest level of density (7.5 million square feet of total floor space) and building heights (maximum 200 feet); therefore, Alternative 1 would feature the highest potential for aesthetic and visual impacts, with the potential for impacts under Alternatives 2 and 3 being less. The specific layout of uses, building footprints and building heights cannot be specifically defined at this time; therefore, for the purposes of this Draft EIS analysis, assumptions were made regarding the potential level of redevelopment, location of buildings and building heights that could occur during the buildout period as a tool to address potential aesthetic impacts on a "worst-case" basis. Actual uses, building footprints, designs, heights, etc. would be determined based on future market conditions and the specific needs of tenants, as well as the provisions of the Master Development Plan, Development Agreement and applicable zoning and development regulations and standards that would govern long-term site redevelopment.

Under the No Action Alternative, new industrial development assumed for the site would be consistent with current industrial zoning requirements. The City of Bellingham code does not include any height restrictions for industrial zoning; however, a maximum building height of 50 feet is assumed under the No Action Alternative to reflect the typical character of light/marine industrial structures. Changes in aesthetic conditions under the EIS Alternatives would be anticipated to occur incrementally over the approximately 20-year buildout of the site.

Aesthetics

Visual Character

Alternatives 1 through 3 were developed to demonstrate a range of densities and building heights that could occur on the site over the long-term. Because the specific location and design of buildings cannot be defined at this time, the exact visual character and design of redevelopment cannot be depicted either. However, based on general land use concepts and

identified objectives for site redevelopment, as envisioned by the Port and City, character sketch renderings were developed to represent the visual character of potential development on the site through street-scape illustrations. **Figure 3.10-1** provides an illustration of the public shoreline parks and trails and pedestrian features that would be assumed near the Whatcom Waterway under Alternatives 1 through 3. Commercial and institutional uses are also depicted in this figure as are the ground floor retail uses and pedestrian-oriented uses assumed on the site. **Figure 3.10-2** depicts the proposed marina and adjacent redevelopment in Area 1, along with public gathering spaces assumed throughout the site.

Under the redevelopment concept, maximum building heights would vary throughout the site, with taller buildings in the eastern portion of the site in proximity to the CBD (Areas 2, 3 and 5), and lower buildings in the western and northern portions of the site (Areas 1, 4, 6, 7, 8, 9 and 10). This would limit the potential for new buildings on the site to be substantially different in scale than buildings in surrounding areas, and minimize the potential for visual impacts.

These sketches are intended to convey a sense of the potential visual conditions of redevelopment under Alternatives 1 through 3. These sketches are not meant to represent specific design details, but rather express the possible visual character of the site. As illustrated, the site would represent a dense, urban character with pedestrian-oriented areas, park/open space areas, trails, street trees and landscaping located throughout the site. The overall character of redevelopment would be consistent with the surrounding community, particularly the CBD, and would create the feel of an extension of the downtown area (refer to Section 3.7, **Land Use**, for more information on the redevelopment's relationship to the CBD).

Visual Analysis Methodology

As part of the visual analysis for this Draft EIS, 14 viewpoint locations were selected as representative views of the site[1]. Based on these viewpoints, visual simulations of site redevelopment under each EIS Alternative were prepared based on massing concepts that assume a level of redevelopment and building heights consistent with each Redevelopment Alternative. Because development of all buildings to the maximum height would result in total site building area that would be substantially greater than the building area assumed for each alternative (i.e. greater than 7.5 million square feet under Alternative 1), only a portion of the buildings are illustrated at the maximum identified height; to illustrate the maximum height envelope within which assumed building development could occur, each simulation for Alternative 1 also includes a three-dimensional envelope representing the maximum building height assumed for the various site redevelopment areas (i.e. 200 feet in Area 2, 150 feet in Areas 3 and 5, and 100 feet in Areas 1, 4 and 6 through 10 under Alternative 1).

The visual analysis presented in this section includes figures that incorporate the following:

- Photographs illustrating the existing visual condition as viewed from the respective viewpoint.

[1] Approximately 150 photographs were taken from public areas surrounding the site, representing 37 separate diverse viewpoints to the site. From this inventory, 14 of the viewpoints were selected as being most representative of area viewpoints and/or were determined to have the greatest potential for site redevelopment to change the character of the view from the viewpoint. Simulations of site redevelopment were formulated for these 14 viewpoints and detailed analysis in this Draft EIS.

Shoreline Parks & Trails

Source: Stefanie Bower

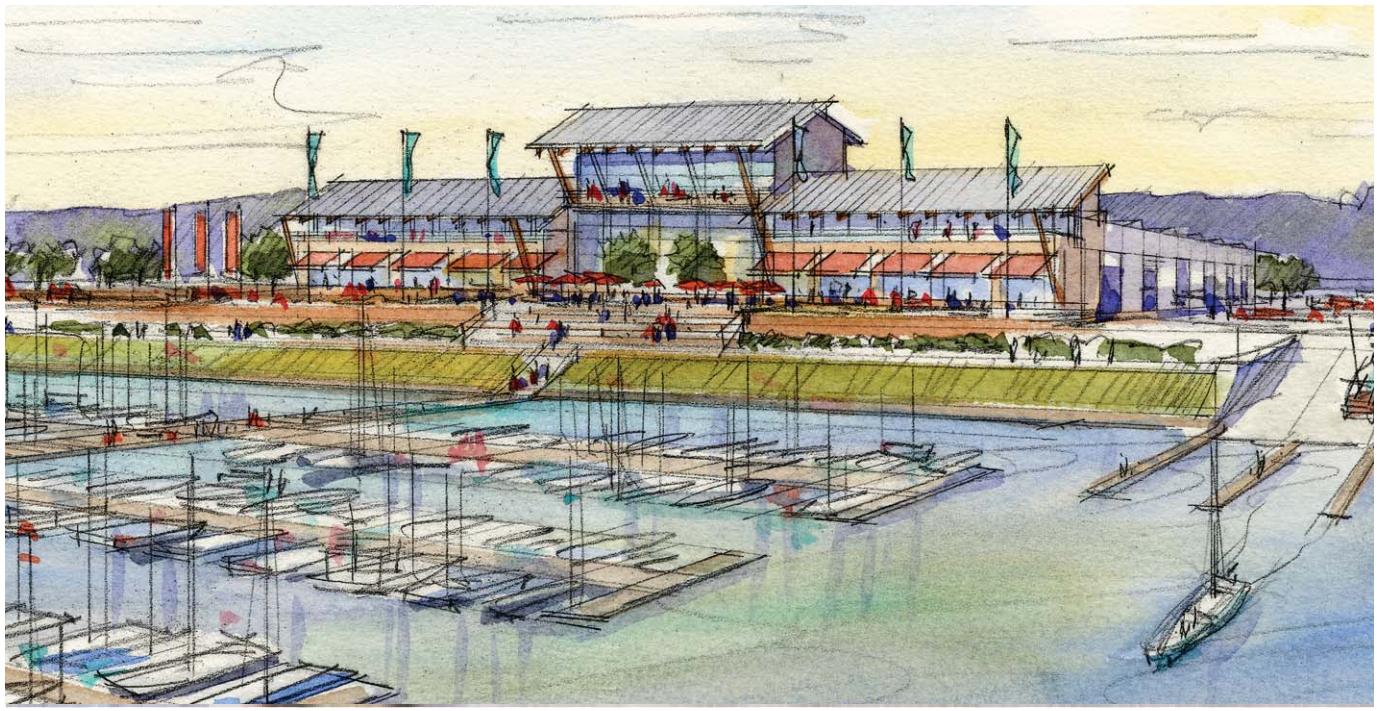
Commercial & Institutional Uses

Source: Stefanie Bower

BLUMEN CONSULTING GROUP, INC	Figure 3.10-1 Character Sketches	New Whatcom Redevelopment EIS

Public Plaza

Source: Stefanie Bower



Marina and Adjacent Redevelopment

Source: Stefanie Bower

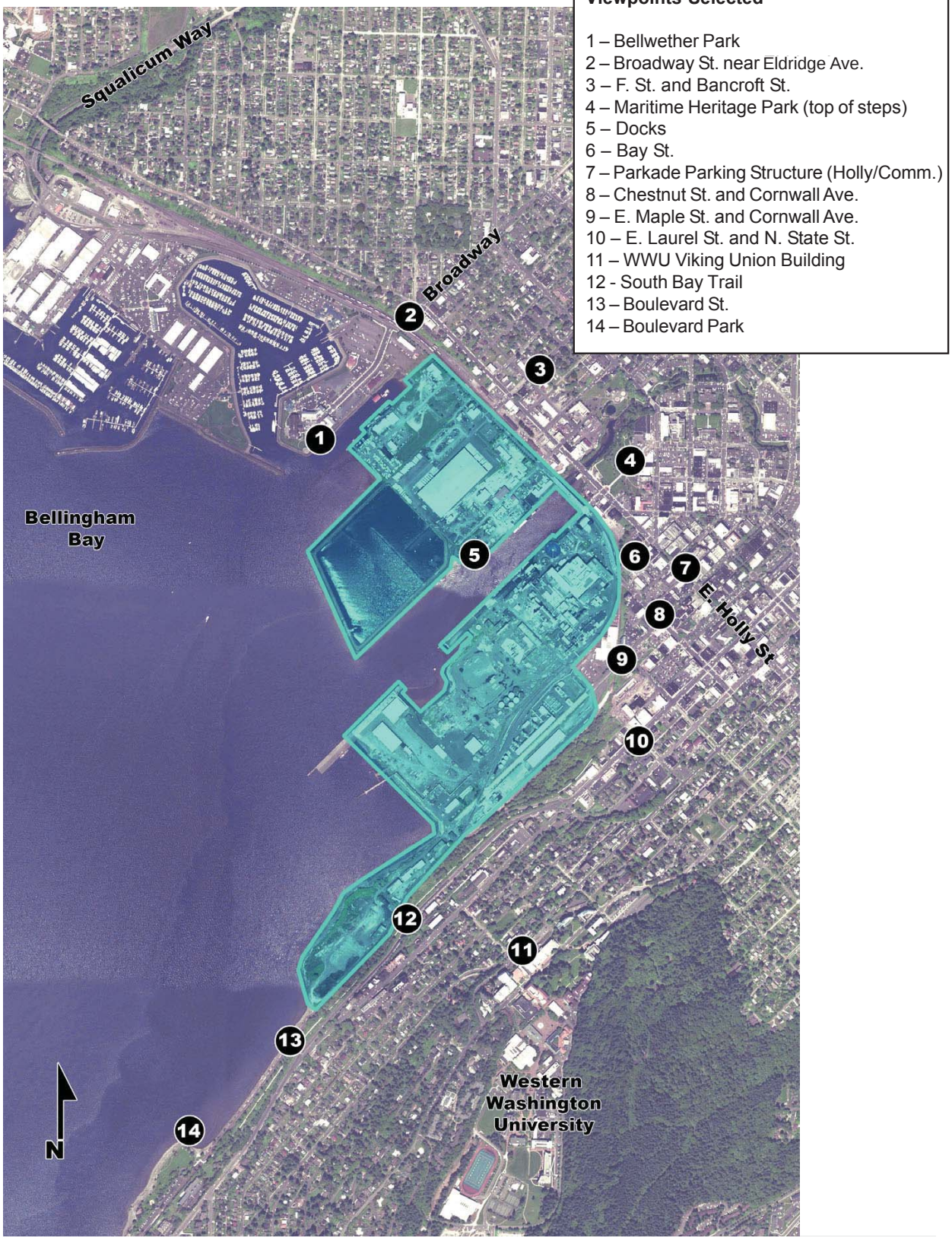
- Illustrations showing the maximum height envelope(s) assumed for the redevelopment area(s) visible from the respective viewpoint. The maximum height envelopes reflect the maximum heights assumed for Alternative 1, including the 100-foot maximum height for Areas 1, 4 and 6 through 10, the 150-foot maximum height for Areas 3 and 5, and the 200-foot maximum height for Area 2 (because Alternative 1 assumes the highest maximum building height(s), the maximum height envelopes are illustrated for Alternative 1 only – assumed maximum heights for Alternatives 2 and 3 are lower than Alternative 1 and would have a lower potential for visual impact.). These maximum height envelopes are intended to illustrate the maximum envelope within which building(s) could be developed. However, the maximum height envelopes could never be achieved over the entire site (for example, if all buildings were built to the maximum heights, total square footage for Alternative 1 would greatly exceed 7.5 million square feet). Therefore, these illustrations likely overstate the potential for visual impact. In order to represent a more likely redevelopment scenario (one that is consistent with the assumed building square footage for the Alternatives), conceptual massing simulations were prepared, as described below.

- Simulations of conceptual building massing representing the extent of potential building massing visible from the respective viewpoint and consistent with the assumed total building square footage and the assumed maximum heights for the Alternatives. The conceptual massing simulations reflect realistic redevelopment scenarios under the Alternatives (i.e. 7.5 million square feet under Alternative 1, 6 million square feet under Alternative 2 and 4 million square feet under Alternative 3). Only a portion of the buildings are assumed at the maximum identified height in the simulations; for example, any one building in Area 2 under Alternative 1 could be developed to the maximum height of 200 feet, although not all of the buildings in Area 2 would be developed to the maximum height. These simulations, which do not include anticipated sidewalks, street trees or landscaping, are not intended to reflect exact building locations, heights or character; they are used as a tool to address potential visual impacts only.

To illustrate the range of potential building development, analysis of Alternative 1 also includes simulations from a second massing concept, with different buildings illustrated at the maximum height. In addition, a simulation that reflects the potential for building modulations (upper level building setbacks, etc) is also provided. Refer to **Appendix K** for further discussion of the visual simulation methodology.

Visual Conditions

The primary viewer groups surrounding this site include the following: motorists using area roadways; residents in the surrounding site vicinity including south-facing residents of the Columbia Neighborhood, north-facing residents of the South Hill neighborhood and residents in the CBD; users of park/open space features; visitors and employees in the CBD; and, boaters in Bellingham Bay. **Figure 3.10-3** provides a location map of all of the selected viewpoints.



Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-3
View Point Locations

New Whatcom Redevelopment EIS

Alternative 1

At full buildout, Alternative 1 would substantially change the aesthetic character of the site from its existing vacant and underutilized industrial use to an urban mixed use development with a range of new uses. As described above, full buildout of the site would occur incrementally over the approximately 20-year buildout period, thus, changes in the site character would occur gradually.

By 2026, it is assumed that approximately 7.5 million square feet of mixed uses would be developed on the New Whatcom site, along with 33 acres of public parks, trails and habitat restoration areas. The remainder of the site would be primarily developed in roadways, structured and surface parking, sidewalks, outdoor spaces and landscaping. Redevelopment under Alternative 1 is assumed to have maximum building heights of 100 feet in Area 1, 200 feet in Area 2, 150 feet in Areas 3 and 5, and 100 feet in Areas 4 and 6 through 10.

The aesthetic character of the site would reflect an urban mixed use development with new parks, trails, habitat restoration areas, pedestrian-oriented circulation and vehicular circulation. The overall quality of building design would likely be higher compared to existing site conditions, and would be consistent with the overall character of the surrounding areas, including the CBD. It is assumed that building design, construction and materials would likely be coordinated through adoption and implementation of consistent design standards over the long-term buildout period.

Because of the configuration of the New Whatcom site and the presence of industrial bulkhead/wharf features, the majority of the shoreline area of the site is not visible from the surrounding community, including the CBD, Lettered Streets and South Hill neighborhoods. The shoreline areas of the site that are most visible from the surrounding community include shorelines along the I and J Waterway (visible from the Lettered Streets Neighborhood), shoreline along the Whatcom Waterway (visible from the CBD Neighborhood) and shoreline along Area 10 (visible from Boulevard Park). In general, the aesthetic and visual character of the majority of the shoreline areas of the site with redevelopment would change from industrial wharf/bulkhead to public open space containing trails and park open space, as well as some restored natural shoreline area.

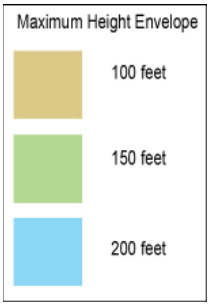
Depending on the viewpoint, different portions of redevelopment on the site would be visible. Representative views of the site, illustrating existing visual conditions and visual conditions under Alternative 1 are shown in **Figures 3.10-4** through **3.10-17**; **Figures 3.10-18** through **3.10-21** illustrate an alternative massing concept for Alternative 1, and **Figure 3.10-22** illustrates the potential visual character with building articulation. Views depicting the site were chosen to illustrate a variety of representative views affecting primary viewer groups in the site vicinity.

As indicated earlier, the figures for Alternative 1 below include maximum height envelopes which illustrate the identified maximum heights for each site area (note that not all buildings would need to be developed to the maximum height to achieve the building square footage assumed for the Alternatives) and a conceptual massing concept that reflects a realistic redevelopment scenario. The discussion on visual conditions with redevelopment under Alternative 1 focuses on the conditions illustrated by the conceptual massing concept.

View 1_Existing

View 1_Maximum Height Envelope

This illustration is intended to represent the maximum height envelope and does not represent potential building massing. See simulation below for potential building massing.



View 1_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

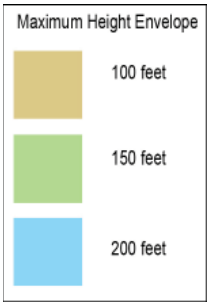
BLUMEN CONSULTING GROUP, INC

Figure 3.10-4
View 1 - Bellwether Park
Alternative 1

New Whatcom Redevelopment EIS

View 2_Existing

This illustration is intended to represent the maximum height envelope and does not represent potential building massing. See simulation below for potential building massing.



View 2_Maximum Height Envelope

View 2_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

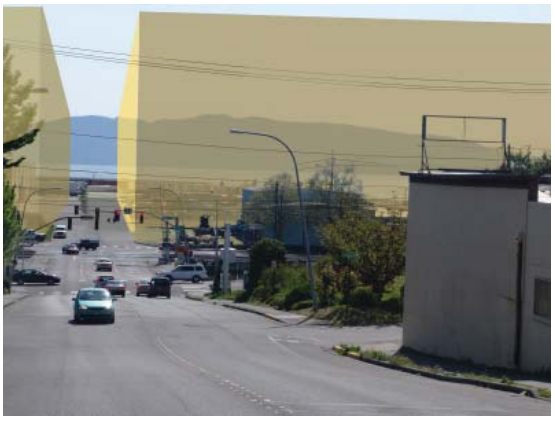
Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-5
View 2 - Broadway St. near Eldridge Ave.
Alternative 1

New Whatcom Redevelopment EIS

View 3_Existing



View 3_Maximum Height Envelope

This illustration is intended to represent the maximum height envelope and does not represent potential building massing. See simulation below for potential building massing.

View 3_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

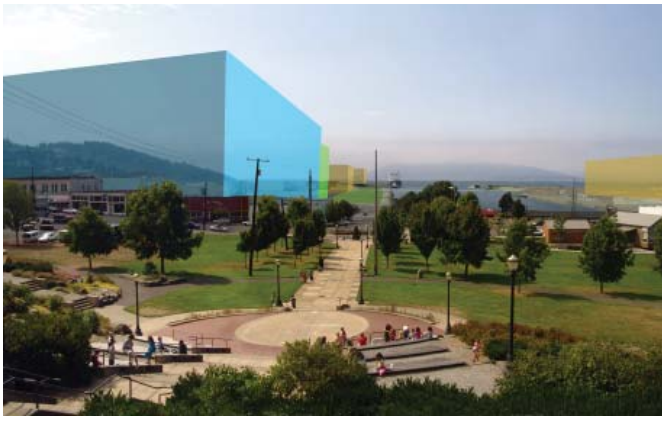
Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-6
View 3 - F. St. and Bancroft St.
Alternative 1

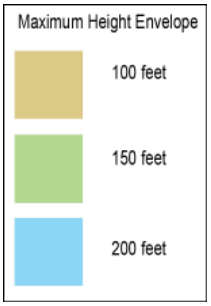
New Whatcom Redevelopment EIS

View 4_Existing



View 4_Maximum Height Envelope

This illustration is intended to represent the maximum height envelope and does not represent potential building massing. See simulation below for potential building massing.



View 4_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

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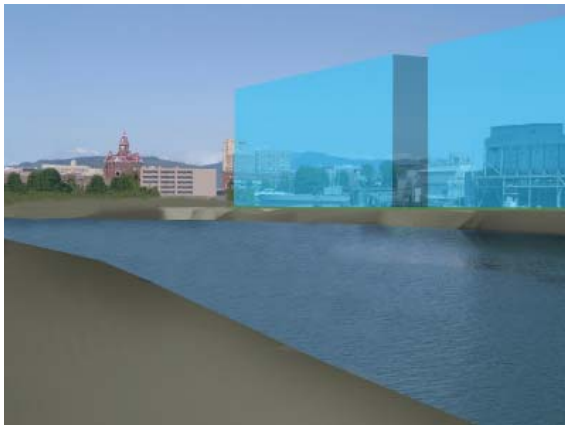
Figure 3.10-7
View 4 - Maritime Heritage Park (Top of Steps)
Alternative 1

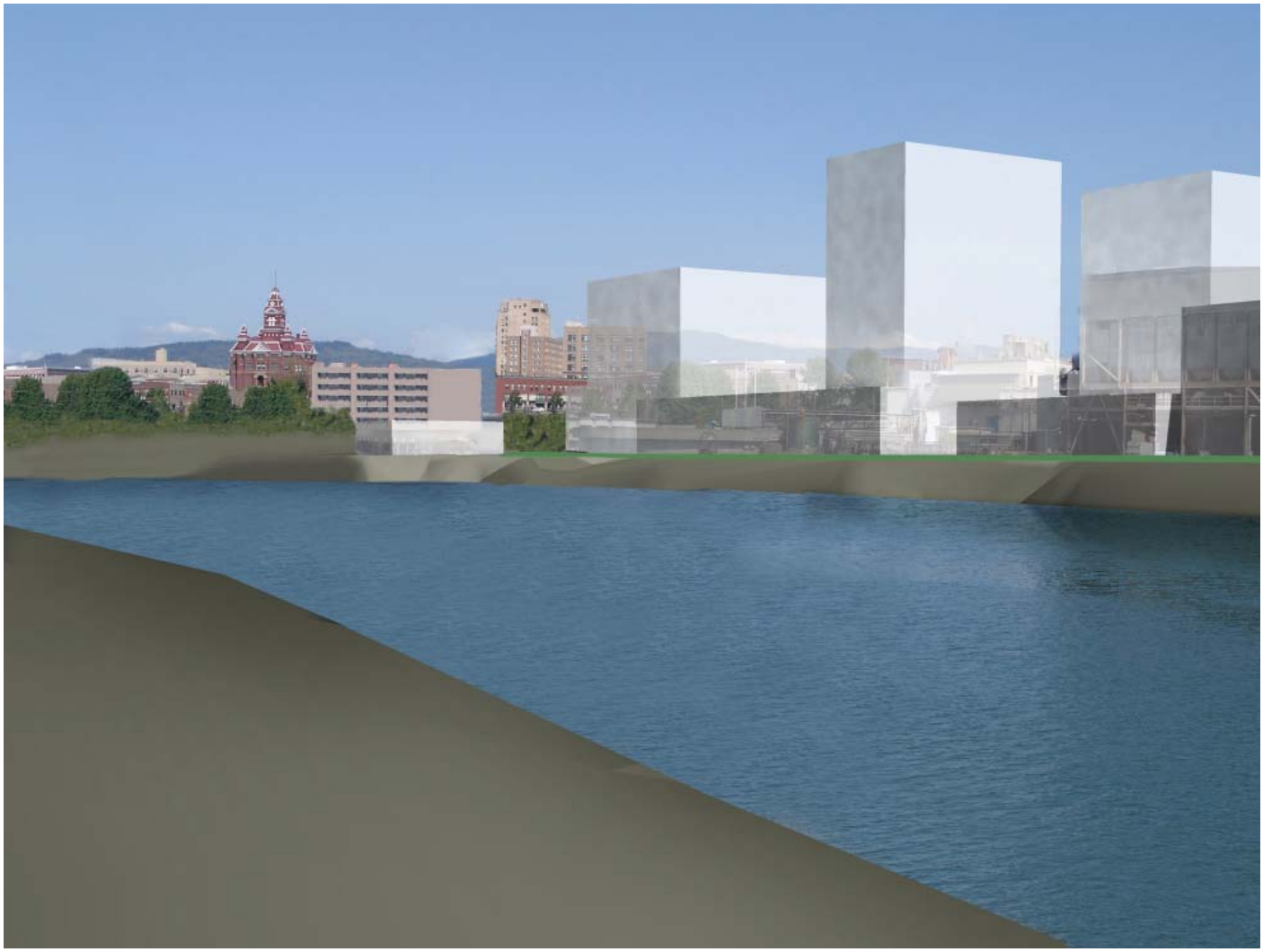
New Whatcom Redevelopment EIS

View 5_Existing



View 5_Maximum Height Envelope

This illustration is intended to represent the maximum height envelope and does not represent potential building massing. See simulation below for potential building massing.



View 5_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-8
View 5 - Docks
Alternative 1

New Whatcom Redevelopment EIS

View 6_Existing

View 6_Maximum Height Envelope

This illustration is intended to represent the maximum height envelope and does not represent potential building massing. See simulation below for potential building massing.

View 6_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC	Figure 3.10-9 View 6 - Bay St. Alternative 1	New Whatcom Redevelopment EIS

View 7_Existing

View 7_Maximum Height Envelope

This illustration is intended to represent the maximum height envelope and does not represent potential building massing. See simulation below for potential building massing.

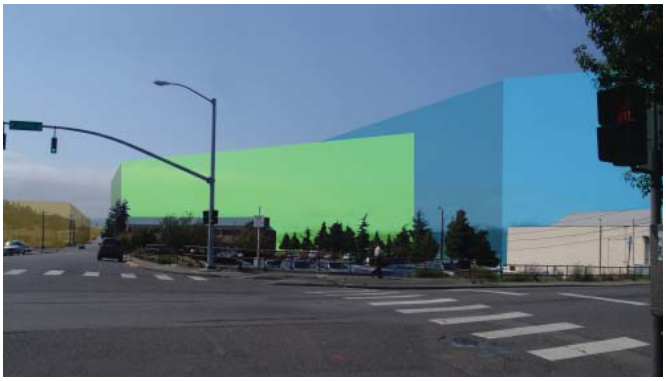
View 7_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

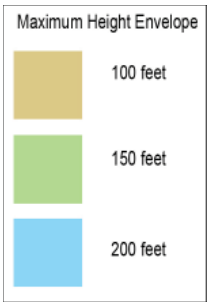
BLUMEN CONSULTING GROUP, INC	Figure 3.10-10 View 7 - Parkade Parking Structure (Holly/Comm.) Alternative 1	New Whatcom Redevelopment EIS

View 8_Existing



View 8_Maximum Height Envelope

This illustration is intended to represent the maximum height envelope and does not represent potential building massing. See simulation below for potential building massing.



View 8_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

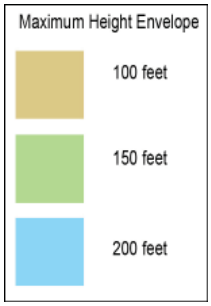
BLUMEN CONSULTING GROUP, INC

Figure 3.10-11
View 8 - Chestnut St. and Cornwall Ave.
Alternative 1

New Whatcom Redevelopment EIS

View 9_Existing

This illustration is intended to represent the maximum height envelope and does not represent potential building massing. See simulation below for potential building massing.



View 9_Maximum Height Envelope

This simulation is a conceptual representation and is not reflective of a specific project design

View 9_Massing Concept

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-12
View 9 - E. Maple St. and Cornwall Ave.
Alternative 1

New Whatcom Redevelopment EIS

View 10_Existing

View 10_Maximum Height Envelope

This illustration is intended to represent the maximum height envelope and does not represent potential building massing. See simulation below for potential building massing.

View 10_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-13
View 10 - E. Laurel St. and N. State St.
Alternative 1

New Whatcom Redevelopment EIS

View 11_Existing

This illustration is intended to represent the maximum height envelope and does not represent potential building massing. See simulation below for potential building massing.

View 11_Maximum Height Envelope

This simulation is a conceptual representation and is not reflective of a specific project design

View 11_Massing Concept

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

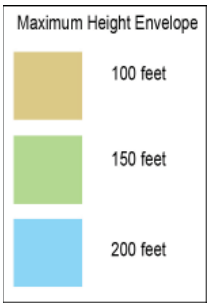
Figure 3.10-14
View 11 - WWU Viking Union Building
Alternative 1

New Whatcom Redevelopment EIS

View 12_Existing

View 12_Maximum Height Envelope

This illustration is intended to represent the maximum height envelope and does not represent potential building massing. See simulation below for potential building massing.



View 12_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-15
View 12 - South Bay Trail
Alternative 1

New Whatcom Redevelopment EIS

View 13_Existing

View 13_Maximum Height Envelope

This illustration is intended to represent the maximum height envelope and does not represent potential building massing. See simulation below for potential building massing.

View 13_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-16
View 13 - Boulevard St.
Alternative 1

New Whatcom Redevelopment EIS

View 14_Existing

View 14_Maximum Height Envelope

This illustration is intended to represent the maximum height envelope and does not represent potential building massing. See simulation below for potential building massing.

View 14_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

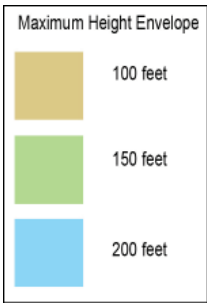
BLUMEN CONSULTING GROUP, INC

Figure 3.10-17
View 14 - Boulevard Park
Alternative 1

New Whatcom Redevelopment EIS

View 2_Existing

This illustration is intended to represent the maximum height envelope and does not represent potential building massing. See simulation below for potential building massing.



View 2_Maximum Height Envelope

View 2_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

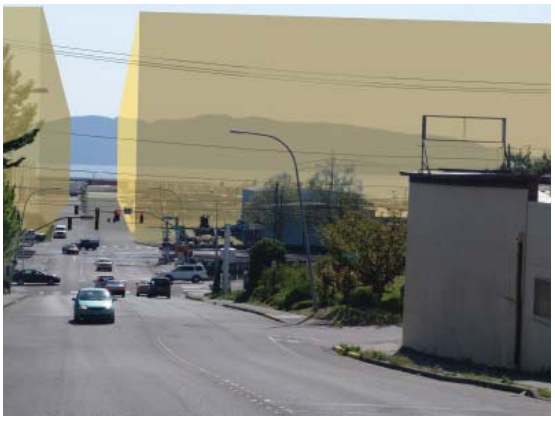
Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-18
View 2 - Broadway St. near Eldridge Ave.
Alternative 1 - Alternate Massing Concept

New Whatcom Redevelopment EIS

View 3_Existing



View 3_Maximum Height Envelope

This illustration is intended to represent the maximum height envelope and does not represent potential building massing. See simulation below for potential building massing.

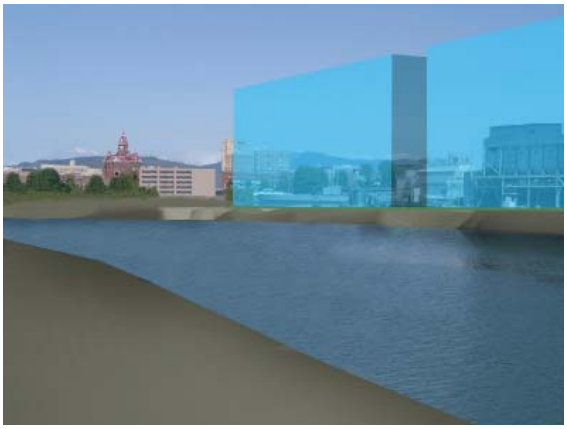
View 3_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

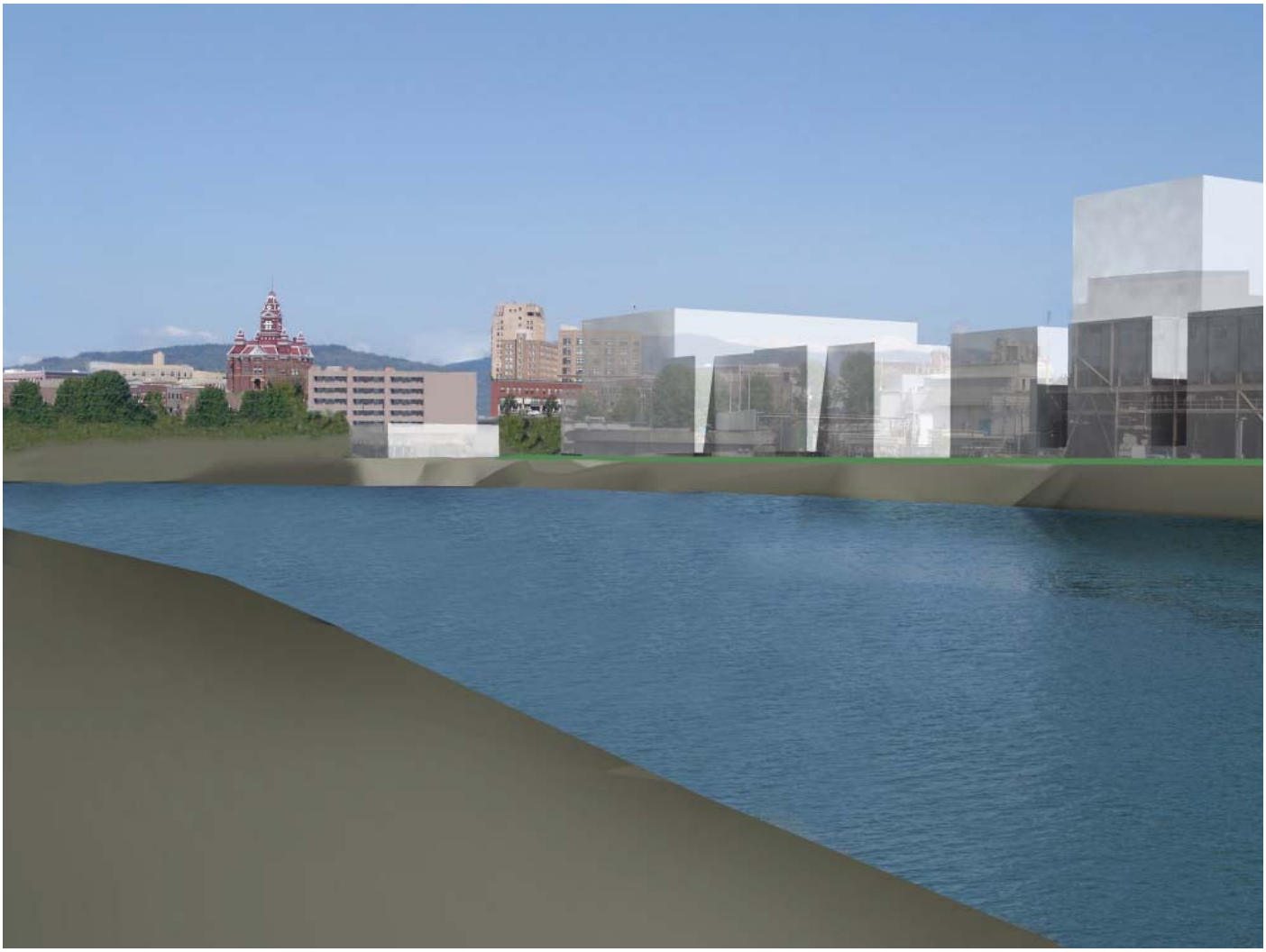
BLUMEN CONSULTING GROUP, INC	Figure 3.10-19 View 3 - F. St. and Bancroft St. Alternative 1 - Alternate Massing Concept	New Whatcom Redevelopment EIS

View 5_Existing



View 5_Maximum Height Envelope

This illustration is intended to represent the maximum height envelope and does not represent potential building massing. See simulation below for potential building massing.



View 5_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-20
View 5 - Docks
Alternative 1 - Alternate Massing Concept

New Whatcom Redevelopment EIS

View 7_Existing

View 7_Maximum Height Envelope

This illustration is intended to represent the maximum height envelope and does not represent potential building massing. See simulation below for potential building massing.

View 7_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

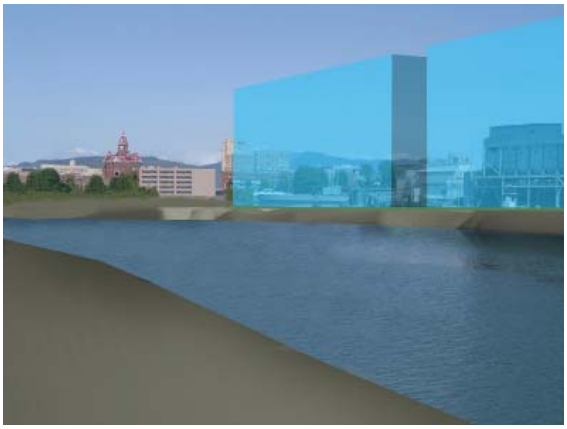
Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-21
View 7 - Parkside Parking Structure (Holly/Comm.)
Alternative 1 - Alternate Massing Concept

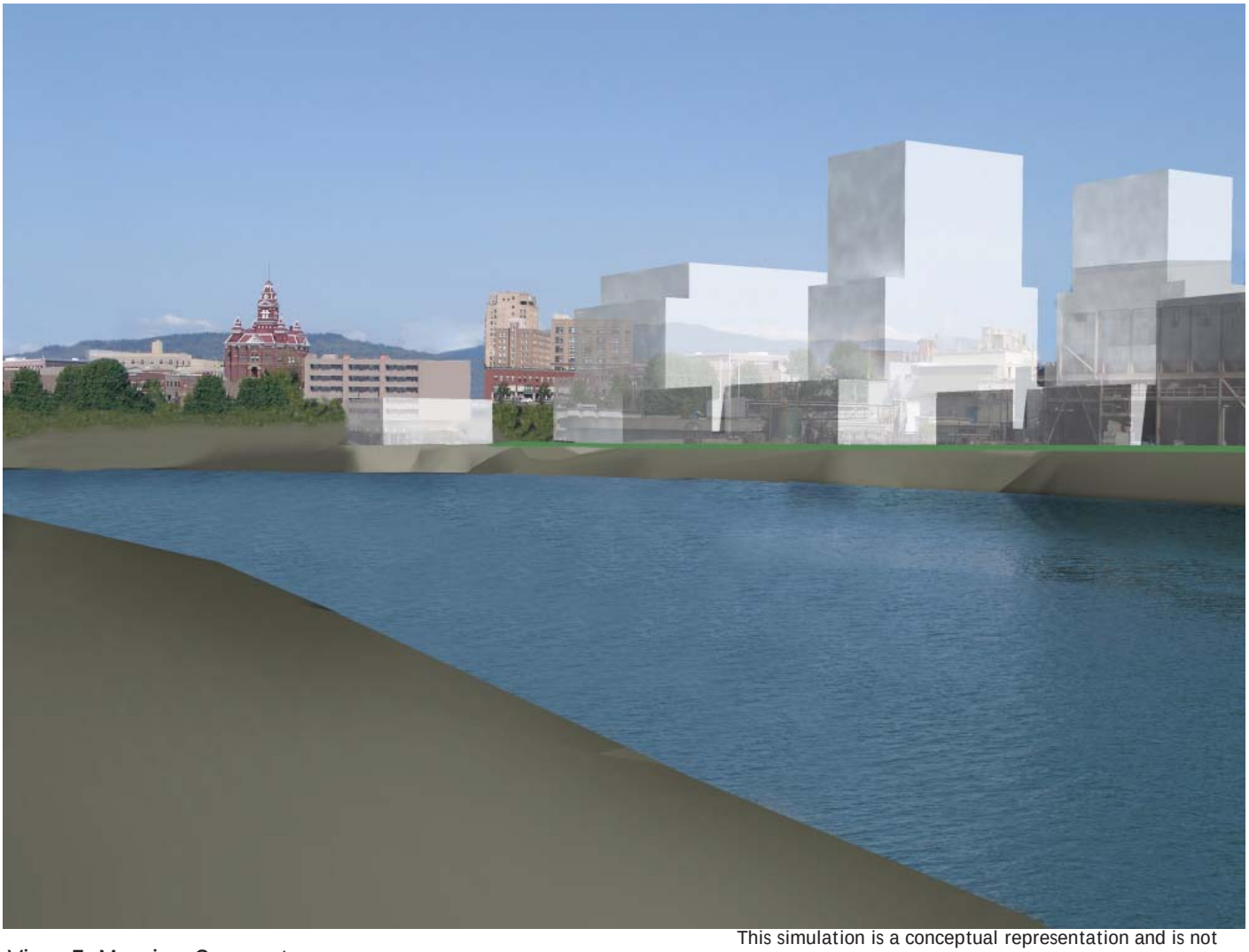
New Whatcom Redevelopment EIS

View 5_Existing



View 5_Maximum Height Envelope

This illustration is intended to represent the maximum height envelope and does not represent potential building massing. See simulation below for potential building massing.



View 5_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-22
View 5 - Docks
Alternative 1 - Building Articulation

New Whatcom Redevelopment EIS

The view from Bellwether Park to the north of Area 1, beyond the I and J Waterway (viewpoint #1), is shown in **Figure 3.10-4**. The existing view from this location looking south includes the I and J Waterway and Bellingham Bay in the foreground and a pier, bulkhead/wharf, paved areas with outdoor storage and low-rise (one to two-story) industrial buildings/structures in Area 1. In the background are more distant views of buildings in Areas 2 through 4, buildings in the CBD and the South Hill neighborhood.

From viewpoint #1, the assumed 100-foot maximum building height envelope associated with Area 1 under Alternative 1 would be visible. Under Alternative 1, the character of the view from this viewpoint would change from outdoor storage and low-rise industrial buildings to a more densely developed urban area with multistory, mixed-use buildings. This view would reflect new buildings and vegetated area/open space along the western edge of Area 1, and the upper portions of new buildings in Areas 2 and 5 in the background. It is assumed that buildings within Area 1 could be a maximum of 100 feet in height; however, it is likely that redevelopment would feature a range of building heights within a given redevelopment area. Existing background views of the downtown CBD from viewpoint #1 would be altered by redevelopment on the site; however views of the I and J Waterway and Bellingham Bay would remain.

Viewpoint #2 is located to the northeast of the New Whatcom site on Broadway Street near Eldridge Avenue. The existing view looking southwest towards the site from this location (**Figure 3.10-5**) includes existing low-rise buildings within Area 1 of the site, particularly the GP tissue warehouse, as well as paved outdoor storage area. Existing buildings in Areas 2 through 4 are also visible in the background. Views of the South Hill neighborhood are available in the distant background.

From viewpoint #2, the assumed 100-foot maximum building height envelope on Area 1 under Alternative 1 would be visible. The view from this viewpoint under redevelopment associated with Alternative 1 would include new multi-story, mixed-use buildings in Area 1 of the site along with vegetated area associated with the trail along the southern edge of the I&J Waterway. Redevelopment under Alternative 1 would thus change the visual character of the site from low-rise industrial buildings and outdoor storage areas to a more densely developed area. Redevelopment on the site would obstruct a majority of the views across the site to the South Hill neighborhood, with the exception of the southern portions of the area located on the hillside (primarily consisting of the Sehome Hill Arboretum).

Figure 3.10-6 (viewpoint #3) illustrates the view from the east of Area 1 at the intersection of F Street and Bancroft Street. The existing view looking west includes streets, buildings and vegetation in the foreground. Parking areas and buildings in Area 1, including the GP tissue warehouse and surface storage use, are located in the mid-ground view. Views of Bellingham Bay and Lummi Island are available in the background.

From viewpoint #3, the assumed 100-foot maximum height envelope on Area 1 under Alternative 1 would be visible. With assumed redevelopment under Alternative 1, the offsite foreground view of buildings and roadway area from viewpoint #3 would remain unchanged. The surface storage use comprising the mid-ground view (primarily encompassing the portion of the New Whatcom site visible from this location) would change to reflect new multi-story, mixed-use buildings in Area 1. Portions of the view toward Bellingham Bay and Lummi Island would be affected by the redevelopment; however, a view corridor following F Street would allow for a view corridor across the site towards Bellingham Bay and Lummi Island.

The view from Maritime Heritage Park looking west is shown in **Figure 3.10-7** (viewpoint #4). Panoramic views of the site are available from this location including views of existing buildings in Areas 1 through 4 and the Whatcom Waterway. The existing buildings on the portion of the site south of the Whatcom Waterway are visually prominent, with the existing buildings to the north of the Whatcom Waterway being less visually prominent. Views of Bellingham Bay and Lummi Island are available through a view corridor down the Whatcom Waterway. Background views of the South Hill neighborhood are also available.

From viewpoint #4, the assumed 100-foot maximum height envelope on Area 1 north of the Whatcom Waterway, and the 200-foot (Area 2), 150-foot (Area 3) and 100-foot (Area 4) assumed maximum height envelopes south of the Whatcom Waterway under Alternative 1 would be visible. From this viewpoint, the assumed view with redevelopment under Alternative 1 would reflect new buildings in Areas 1 through 4, with parks and open space provided along the southern edge of the Whatcom Waterway. New buildings in Area 2 are assumed to be the tallest on the site with a maximum height of 200 feet; however it is assumed that redevelopment in these areas would feature a range of building heights. Redevelopment in areas to the south of the Whatcom Waterway (Areas 2-4) would replace the existing buildings with new buildings of greater height and scale than existing buildings. The area along the southern edge of the waterway would include park open space and buildings at a lower height, with buildings of lower height also located along the northern edge of the waterway; the combination of open space and low height buildings along the waterway would create a view corridor along the waterway to the west. New buildings in Areas 2 through 4 would affect background views of the South Hill neighborhood to the south and views to the northwest of Bellingham Bay. Existing views down the Whatcom Waterway towards Bellingham Bay and Lummi Island would remain.

Viewpoint #5 is located at the wharf on the southwest edge of Area 1 of the site. The existing view from this location looking to the southeast (**Figure 3.10-8**) includes foreground views of the Whatcom Waterway, bulkhead and wharf areas on the north and south sides of the Waterway and buildings in Area 2. Views of the CBD are available in the background and include views of the Whatcom Museum of History and Art, a visually prominent building in the CBD.

The 200-foot maximum height envelope assumed for Area 2 under Alternative 1 would be visible from viewpoint #5. Views from this viewpoint under Alternative 1 would include new buildings in Areas 2 through 4, the Whatcom Waterway and parks and open space area along the south edge of the Whatcom Waterway; buildings in Area 2 could be a maximum of 200 feet in height. Portions of the view towards the downtown CBD would be obstructed by the redevelopment, but some views toward downtown, including the Whatcom Museum of History and Art, would remain. Because of the removal of the existing over-water pier on the northern edge of the Whatcom Waterway, the view of the waterway from this location would be improved compared to existing conditions.

Figure 3.10-9 illustrates the view from Bay Street, looking west towards the site (viewpoint #6). This viewpoint provides a direct view towards the site and the existing wood and brick buildings located in Area 2. Views of existing buildings and streetscapes are available in the foreground. No views of Bellingham Bay are available from this location.

From viewpoint #6, the assumed 200-foot maximum height envelope associated with Area 2 under Alternative 1 would be visible in the foreground, with the assumed 100-foot maximum height envelope associated with Area 4 visible at the terminus of the extended Bay Street. Under Alternative 1, the view from this viewpoint would reflect new building development along

Bay Street that would extend into the site; the extension of Bay Street into the site (and associated removal of existing buildings) would increase the amount of the site visible from the location. The field of view from this location would include existing streetscape along Bay Street and buildings on the north and south sides of Bay Street. As under existing conditions, no view of Bellingham Bay would be available from this location.

The view from the Parkade Parking Structure in the CBD looking west (viewpoint #7) is shown in **Figure 3.10-10**. Panoramic views of the CBD and waterfront area are available from this location. Views of existing buildings in the CBD are available in the foreground, with existing buildings throughout the site visible in the mid-ground view. Views of Bellingham Bay and Lummi Island are available in the background.

From viewpoint #7, the assumed 200-foot maximum height envelope associated with Area 2 under Alternative 1 would be visible in the foreground, with the assumed 150-foot maximum height envelope associated with Area 5 and assumed 100-foot maximum height envelope associated with Area 8 visible in the background. The view from this viewpoint under Alternative 1 features panoramic views of redevelopment in Areas 2 through 8. Although maximum building heights in these areas are assumed to be 200 feet in Area 2, 150 feet in Areas 3 and 5, and 100 feet in Area 4 and Areas 6 through 8; it is assumed that redevelopment would feature a range of building heights as depicted in the simulation. From this location, new buildings on the site would be visually prominent. Redevelopment on the site would generally appear as a continuation of existing buildings in the CBD although new buildings on the site would be generally taller than those in the CBD. Portions of the view of Bellingham Bay to the northwest would be affected by new buildings on the site, although some views of the Bay between buildings would remain. Views of Bellingham Bay and Lummi Island to the west would continue to be available.

Viewpoint #8 is located to the southeast of the site at the intersection of Cornwall Avenue and Chestnut Street. The existing view from this location looking west (**Figure 3.10-11**) includes existing CBD buildings and parking areas in the foreground with views of existing brick buildings in Areas 2 through 4 available in the background. No views of Bellingham Bay are available from this location.

From viewpoint #8 under Alternative 1, the assumed 200-foot maximum height envelope associated with Area 2 and the assumed 150-foot maximum height envelope associated with Area 5 would be visible north of Cornwall Avenue, with the 100-foot maximum height envelope associated with Area 7 visible south of Cornwall Avenue. Under Alternative 1, views from viewpoint #8 would include new buildings in Areas 2, 5 and 7 with the tallest buildings featured in Area 2. Because the existing visual character of the site is defined by building development, the overall visual character of this view would not substantially change. As under existing conditions, buildings on the New Whatcom site would obstruct any views towards Bellingham Bay from this location.

Figure 3.10-12 illustrates the existing view from the south of Area 5 at the intersection of E Maple Street and Cornwall Avenue (viewpoint #9). The view from this location looking west includes paved area and existing buildings on the site in Areas 3, 4 and 6. Limited views of Bellingham Bay and Lummi Island are available across the site. A limited view of the tip of South Hill is also available in the background.

From viewpoint #9 under Alternative 1, the assumed 150-foot maximum height envelope associated with Area 5 would be visible in the foreground, with the 100-foot maximum height envelope associated with Area 6 and 7 visible in the background. From this viewpoint with redevelopment under Alternative 1, the visual character of the site would change from mostly paved area with interspersed buildings to a more densely developed area. Under Alternative 1, new building development in Areas 5 and 7 would be located on either side of a diagonal street (Log Pond Drive), intended to provide a view corridor generally from the intersection of E Maple Street and Cornwall Street to Bellingham Bay. As illustrated in this figure a view of Bellingham Bay framed by the buildings would be provided; although portions of the views across the site towards Bellingham Bay and Lummi Island would be affected by redevelopment. The existing limited view of the tip of South Hill would be obstructed by new buildings along Cornwall Avenue.

Viewpoint #10 is located to the south of Area 7 at the intersection of Laurel Street and N State Street (**Figure 3.10-13**). The existing view looking north from this location includes a view of existing offsite buildings along Laurel Street in the foreground, with views of buildings on the site, including the existing brick buildings in Areas 3 and 4, available in the background. Views across the site towards the residential areas of the Columbia neighborhood are also available farther in the background; no views of the Whatcom Waterway or Bellingham Bay are available from this location.

From viewpoint #10 under Alternative 1, the assumed 150-foot maximum height envelope associated with Area 5 would be visible in the foreground, with the 200-foot maximum height envelope associated with Area 2 visible in the background. Under Alternative 1, views from viewpoint #10 with redevelopment would reflect new building development along Laurel Street that would be extended onto the site. Maximum building heights in Areas 3 through 5, along Laurel Street, would be 150 feet; however it is assumed that development would include a range of building heights. Existing views of the Columbia neighborhood would be obstructed by redevelopment. As under existing conditions, no views of Bellingham Bay would be available from this location.

The view from the Viking Union Building on the Western Washington University campus (viewpoint #11) is depicted in **Figure 3.10-14**. Looking north from this location, panoramic views of the entire site, Bellingham Bay and the waterfront and existing neighborhoods to the north and east (Columbia, Lettered Streets and CBD neighborhoods) are available. Existing buildings on the site visually appear to be a continuation of development in the CBD and surrounding area.

From viewpoint #11, the assumed maximum height envelopes under Alternative 1 for the entire site are visible; from this viewpoint the provision of the tallest buildings in the eastern portion of the site (Areas 2, 3 and 5) adjacent to the CBD is evident. The view from viewpoint #11 under Alternative 1 would provide panoramic views of site redevelopment under Alternative 1. New buildings in Areas 1 through 10 would be clearly visible from this location with the tallest buildings located in Area 2. New buildings on the site would appear as a continuation of development in the CBD and surrounding areas, although buildings would be generally taller than existing buildings in the CBD. Views towards Bellingham Bay and surrounding neighborhood areas would remain; however, a portion of views from this location towards the CBD and other surrounding neighborhoods to the east could be affected by redevelopment.

Figure 3.10-15 illustrates the view from the South Bay Trail located to the south of Area 10 (viewpoint #12). The existing view looking north from the trail towards the site and Bellingham Bay is nearly completely obstructed in this area due to existing vegetation along the trail. Filtered views of the site and Bellingham Bay are available through the existing vegetation. Additional views to the site and bay would be available during the winter months when deciduous trees are bare.

From viewpoint #12, the assumed maximum height envelope of 100-feet in Area 10 under Alternative 1 would be visible. Under redevelopment associated with Alternative 1, the view from viewpoint #12 would be generally similar to existing conditions. Existing vegetation adjacent to the South Bay Trail would generally block a majority of the views towards the New Whatcom site. The upper portions of the new buildings developed to the maximum height of 100 feet in Area 10 would be visible from this location through gaps in the existing vegetation. A portion of the filtered view to Bellingham Bay would be blocked by new buildings. Buildings in this area would be somewhat more visible in fall and winter when deciduous trees have lost their foliage.

Viewpoint #13 is located to the southwest of Area 10 on Boulevard Street. The existing view from this elevated location looking east (**Figure 3.10-16**) includes views of bluff vegetation in the foreground with views of the site (Areas 9 and 10) and Bellingham Bay in the background; views of the Columbia and Lettered Streets neighborhoods are available farther in the background. However, portions of the view from this location are obstructed due to existing bluff vegetation that impairs the field of view.

From viewpoint 13, the assumed maximum height envelope of 100-feet in Area 9 under Alternative 1 would be visible. The visual conditions of the site as viewed from viewpoint #13 with redevelopment under Alternative 1 would include distant views of new buildings in Areas 9 and 10 along with the upper portion of taller buildings located in Areas 2, 3 and 5. New buildings on the site would be visually prominent. Background views towards the Columbia and Lettered Streets neighborhoods would still remain, although a portion of the view towards these neighborhoods would be affected by redevelopment on the site.

The view from Boulevard Park (viewpoint #14), to the west of the site, is illustrated in **Figure 3.10-17**. Bellingham Bay is prominent in the existing foreground view from this location with views of the site (primarily Areas 1, 9 and 10) and associated buildings available in the background; taller buildings in Areas 2 through 4 are also within the field of view. Views of hillside neighborhoods to the east, beyond the site, are available in the distant background. This viewpoint is also generally representative of views from boats on Bellingham Bay.

From viewpoint #14 under Alternative 1, the assumed 100-foot maximum height envelopes associated with Areas 1, 9 and 10 would be visible in the foreground, with the top of the assumed 200-foot maximum height envelope in Area 2 visible in the background. The view from viewpoint #14 with redevelopment under Alternative 1 would include views of new buildings in Areas 1, 9 and 10; upper portions of taller buildings in Areas 2, 3 and 5 would also be visible. The general character of the view from this location would not change substantially as the New Whatcom site would remain as the focal point of the background view. Portions of distant background views toward existing neighborhoods beyond the site would be affected by redevelopment.

Because development of all assumed buildings to the maximum height defined for each redevelopment area would result in total site square footage that is substantially greater than

the building square footage identified for Alternative 1, visual simulations under Alternative 1 were also developed for an alternate building massing concept to illustrate the range of potential visual impacts that could result with redevelopment. Simulations reflecting different buildings at the maximum height were developed for four of the selected viewpoints to illustrate the range of potential development on the site.

The view from viewpoint #2 (**Figure 3.10-18** from Broadway Street near Eldridge Avenue) under the alternate massing concept would be generally similar to Alternative 1, although buildings along the southern edge of the I&J Waterway in Area 1 would be lower and certain background buildings in Area 1 would be taller than in the initial Alterative 1 concept. Overall view conditions would be similar to the original massing concept, although more of the background view to the South Hill neighborhood would be obstructed.

From viewpoint #3 (**Figure 3.10-19** from F Street and Bancroft Street), the view under the Alternative 1 alternate massing concept would represent increased building density on the site similar to the original Alternative 1 massing concept, although the differing building height configuration would result in taller buildings in the foreground view and shorter buildings in the background on Area 1; this would allow a somewhat greater view of Lummi Island in the background. A view corridor down F Street would provide views of Bellingham Bay and Lummi Island as under the original Alternative 1 massing concept.

Similar to the original Alternative 1 massing concept, the view from viewpoint #5 (**Figure 3.10-20** from the north side of the Whatcom Waterway) under the alternate massing concept would feature new multi-story buildings in Areas 2 through 4; however, these buildings would be primarily mid-rise buildings and more uniform in height throughout the view. Views of the downtown CBD and the Whatcom Museum of History and Art would be similar to those under the original Alternative 1 massing concept.

Under the Alternative 1 alternate massing concept, the view from viewpoint #7 (**Figure 3.10-21** from the Parkade Parking Structure) would be generally similar to the original Alternative 1 massing concept and buildings on the site would appear as a continuation of development in the CBD. However, buildings on the site would be primarily mid-rise buildings, with fewer high-rise buildings located on the site. As a result, additional views to the northwest of Bellingham Bay would be available from this location. Views of Bellingham Bay and Lummi Island to the west would remain similar to the original Alternative 1 massing concept.

Figure 3.10-22 provides a view from viewpoint #5 (from the north side of the Whatcom Waterway) of redevelopment under Alternative 1 reflecting additional building articulation features that could be included as development standards associated with the Master Development Plan. As indicated, buildings in Areas 2 through 4 continue to comprise a majority of the field of view. However, these buildings feature additional mid-level and upper-level building setbacks among the structures resulting in structures that appear less bulky with more space between the buildings. The incorporation of building articulation would result in building character generally consistent with the CBD. However, even with incorporation of building articulation features new building development on the site would be greater in scale than the majority of the existing buildings in the area.

Alternative 2

As under Alternative 1, redevelopment under Alternative 2 would result in a similar change in the aesthetic character of the site from an underutilized industrial area to an urban mixed use neighborhood with mid- and high-rise buildings. Alternative 2 assumes a similar mix of uses on the site, but with lower density levels and building heights. By 2026, it is assumed that approximately 6 million square feet of mixed uses would be developed on the New Whatcom site, along with 24 acres of public parks, trails and habitat restoration areas. Building development under Alternative 2 is assumed to have a maximum building height of 75 feet in Area 1 (compared to 100 feet under Alternative 1), 140 feet in Area 2 (compared with 200 feet under Alternative 1), 100 feet in Areas 3 and 5 (compared to 150 feet under Alternative 1), and 75 feet in Areas 4 and 6 through 10 (compared with 100 feet under Alternative 1). Visual conditions associated with Alternative 2 would similar to or less than those under Alternative 1.

Views from six of the 14 viewpoints analyzed under Alternative 1 were selected to represent the potential visual conditions with redevelopment under Alternative 2 for comparison with visual conditions assumed under Alternative 1. Because of the lower building density and height, visual impacts under Alternative 2 would similar to or less than those under Alternative 1 for all identified viewpoints. **Figures 3.10-23** through **3.10-28** illustrate views under Alternative 2.

The view from viewpoint #2 under Alternative 2 (**Figure 3.10-23** from Broadway Street near Eldridge Avenue) would include multi-story buildings on the site similar to Alternative 1. However, these buildings would be lower and more uniform in height when compared to Alternative 1 and would allow for additional views across the site towards the South Hill neighborhood.

From viewpoint #3 (**Figure 3.10-24** from the intersection of F Street and Bancroft Street), the view would primarily consist of buildings within Area 1 and a view corridor down F Street which would provide views of Bellingham Bay and Lummi Island. Buildings in Area 1 would be lower in height under this alternative and would allow for additional views of Lummi Island.

Similar to Alternative 1, the view from viewpoint #4 (**Figure 3.10-25** from Maritime Heritage Park) under Alternative 2 would reflect new buildings in Areas 1 through 4 as well as open space along the southern edge of the Whatcom Waterway. As illustrated, the width of open space along the waterway would be narrower than under Alternative 1, with buildings located closer to the waterway. In addition, the buildings would be significantly lower in height and less dense, which would allow for additional views of the South Hill neighborhood to the southwest and Bellingham Bay to the northwest. As under Alternative 1, a view corridor down the Whatcom Waterway would continue to provide views of Bellingham Bay and Lummi Island.

The view from viewpoint #6 (**Figure 3.10-26** from Bay Street) under Alternative 2 would reflect new building development along an extended Bay Street, similar to Alternative 1. Building heights in this area would be 50 to 60 feet lower under Alternative 2 and would provide less building mass along Bay Street when compared to Alternative 1.

Viewpoint #7 (**Figure 3.10-27** from the Parkade Parking Structure) provides a panoramic view of Alternative 2 redevelopment in Areas 2 through 8 of the site, along with the downtown CBD and Bellingham Bay. Building heights would be lower when compared to Alternative 1 and fewer high-rise buildings would be located on the site. The lesser building heights under Alternative 2

View 2_Existing

View 2_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-23
View 2 - Broadway St. near Eldridge Ave.
Alternative 2

New Whatcom Redevelopment EIS

View 3_Existing

View 3_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-24
View 3 - F. St. and Bancroft St.
Alternative 2

New Whatcom Redevelopment EIS

View 4_Existing

View 4_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-25
View 4 - Maritime Heritage Park (Top of Steps)
Alternative 2

New Whatcom Redevelopment EIS

View 6_Existing

View 6_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-26
View 6 - Bay St.
Alternative 2

New Whatcom
Redevelopment EIS

View 7_Existing

View 7_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-27
View 7 - Parkade Parking Structure
Alternative 2

New Whatcom Redevelopment EIS

View 11_Existing

View 11_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-28
View 11 - WWU Viking Union Building
Alternative 2

New Whatcom Redevelopment EIS

The view from viewpoint #11 (**Figure 3.10-28** from the WWU Viking Union Building) presents a panoramic view of the entire New Whatcom site and surrounding vicinity. Compared to Alternative 1, the lower building heights under Alternative 2 would allow for additional views of the surrounding neighborhoods beyond the site to the east and northeast and creates a less substantial sense of development. As under Alternative 1, site redevelopment under Alternative 2 would appear as a continuation of the development pattern in the CBD and surrounding area.

Alternative 2A

Redevelopment under Alternative 2A would feature the same mix and type of land uses on the site as Alternative 2. Therefore, any changes in aesthetic character that would occur under Alternative 2A would be the same as those discussed above under Alternative 2.

Alternative 3

Redevelopment under Alternative 3 would also feature a similar change in aesthetic character to Alternative 1. Alternative 3 assumes a similar mix of uses on the site, but with lower density levels and building heights than Alternative 1 or 2. By 2026, it is assumed that approximately 4 million square feet of mixed uses would be developed on the New Whatcom site, along with 15 acres of public parks, trails and habitat restoration areas. Building development under Alternative 3 is assumed to have a maximum building height of 75 feet in Area 1 (compared to 100 feet under Alternative 1), 100 feet in Area 2 (compared with 200 feet under Alternative 1), 100 feet in Areas 3 and 5 (compared to 150 feet under Alternative 1), and 75 feet in Areas 4 and 6 through 10 (compared with 100 feet under Alternative 1). Visual conditions associated with Alternative 3 would similar to or less than those under Alternative 1 and Alternative 2.

Views from six of the 14 viewpoints analyzed under Alternative 1 were selected to represent the potential visual conditions with redevelopment under Alternative 3 for comparison with visual conditions assumed under Alternative 1. Because of the lower building density and height, visual impacts under Alternative 3 would be similar to or less than those under Alternative 1 for all identified viewpoints. **Figures 3.10-29** through **3.10-34** illustrate views under Alternative 3.

From viewpoint #2 (**Figure 3.10-29** from Broadway Street near Eldridge Avenue), buildings under Alternative 3 within in the field of view in Area 1 would be generally lower when compared to Alternative 1; due primarily to lower assumed density and lower maximum building height limit. As a result, additional views of Bellingham Bay and the South Hill neighborhood are provided from this location.

The view from viewpoint #3 (**Figure 3.10-30** from the intersection of F Street and Bancroft Street) includes lower scale buildings in Area 1, which allows for further views across the site towards Bellingham Bay and Lummi Island than under Alternative 1. The view corridor provided down F Street would be similar to Alternative 1.

Buildings located within the field of view from viewpoint #4 (**Figure 3.10-31** from Maritime Heritage Park) under Alternative 3 would be substantially lower in height than under Alternative 1, which would allow partial views of the South Hill neighborhood and additional views of Bellingham Bay to the northeast. Additionally, the width of open space along the southern edge of the Whatcom Waterway would be substantially narrower than under Alternative 1 (and narrower under Alternative 2 as well) with buildings located closer to the waterway.

View 2_Existing

View 2_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-29
View 2 - Broadway St. near Eldridge Ave.
Alternative 3

New Whatcom Redevelopment EIS

View 3_Existing

View 3_Massing Concept

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-30
View 3 - F. St. and Bancroft St.
Alternative 3

New Whatcom Redevelopment EIS

View 4_Existing

View 4_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-31
View 4 - Maritime Heritage Park (Top of Steps)
Alternative 3

New Whatcom Redevelopment EIS

View 6_Existing

View 6_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-32
View 6 - Bay St.
Alternative 3

New Whatcom Redevelopment EIS

View 7_Existing

View 7_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-33
View 7 - Parkade Parking Structure
Alternative 3

New Whatcom Redevelopment EIS

View 11_Existing

View 11_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-34
View 11 - WWU Viking Union Building
Alternative 3

New Whatcom Redevelopment EIS

From viewpoint #6 (**Figure 3.10-32** from Bay Street), redevelopment under Alternative 3 would reflect new building development along an extended Bay Street. Buildings along Bay Street would be much lower in height when compared to Alternative 1 and provide less development massing from the street level.

Viewpoint #7 (**Figure 3.10-33** from the Parkade Parking Structure) provides an overview of the scale of redevelopment on the site as viewed from the downtown CBD. Building heights and the scale of redevelopment under Alternative 3 would be much lower when compared to Alternative 1. Compared to redevelopment under Alternative 1, additional views of Bellingham Bay and the proposed marina area (Area 11) would be available from this location.

Viewpoint #11 (**Figure 3.10-34** from the WWU Viking Union Building) provides a panoramic view of the site and illustrates the lower density development and building heights provided under Alternative 3. Compared to Alternative 1, the lower building heights assumed under Alternative 3 would afford additional views across the site to the east and northeast of the surrounding neighborhoods would be available under this alternative. As under Alternative 1, site redevelopment under Alternative 3 would appear as a continuation of the development pattern in the CBD and surrounding area.

No Action Alternative

Redevelopment under the No Action Alternative would include development consistent with the existing industrial zoning designation. By 2026, it is assumed that approximately 1 million square feet of new industrial uses would be developed on the New Whatcom site, along with the retention of approximately 1.1 million square feet of existing industrial space. The existing Industrial zoning designation contains no maximum height limit and building height on the site under the No Action Alternative could conceivably be taller than the maximum 200 feet assumed for portions of the site under Alternative 1. However, it is assumed that industrial development on the site would occur in buildings not exceeding approximately 50 feet in height to reflect the typical character of light and marine industrial structures. Visual conditions associated with the No Action Alternative would be similar to or less than those under Alternative 1, 2 and 3.

Views from six of the 14 viewpoints analyzed for Alternative 1 were selected to represent the potential visual conditions with redevelopment under the No Action Alternative for comparison with visual conditions assumed under Alternative 1. In general, the visual character of the site would change from dispersed industrial buildings interspersed with paved vacant and outdoor storage area to a more densely developed industrial area. Because of the lower building density and height, visual impacts under the No Action Alternative would generally be less than those under Alternative 1 for all identified viewpoints. **Figures 3.10-35** through **3.10-40** illustrate views under the No Action Alternative.

From viewpoint #2 (**Figure 3.10-35** from Broadway Street near Eldridge Avenue), the view under the No Action Alternative would reflect a change in visual character from dispersed low-rise buildings and outdoor storage areas to a more densely developed industrial area. Although the No Action Alternative would include lower levels of redevelopment than assumed under Alternative 1. Primarily mid-rise buildings (approximately five-stories in height) would be visible in Area 1 (as opposed to mid and high-rise buildings under Alternative 1), with additional mid-rise buildings in Area 2 visible in the background. Existing retained buildings in Areas 1 through

View 2_Existing

View 2_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC	Figure 3.10-35 View 2 - Broadway St. near Eldridge Ave. No Action	New Whatcom Redevelopment EIS

View 3_Existing

This simulation is a conceptual representation and is not reflective of a specific project design

View 3_Massing Concept

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-36
View 3 - F. St. and Bancroft St.
No Action

New Whatcom Redevelopment EIS

View 4_Existing

View 4_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-37
View 4 - Maritime Heritage Park (Top of Steps)
No Action

New Whatcom Redevelopment EIS

View 6_Existing

View 6_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC	Figure 3.10-38 View 6 - Bay St. No Action	New Whatcom Redevelopment EIS

View 7_Existing

View 7_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC

Figure 3.10-39
View 7 - Parkade Parking Structure
No Action

New Whatcom Redevelopment EIS

/iew 11 _ Existing

View 11_Existing

View 11_Massing Concept

This simulation is a conceptual representation and is not reflective of a specific project design

Source: PRIMEDIA GROUP

BLUMEN CONSULTING GROUP, INC	Figure 3.10-40 View 11 -WWU Viking Union Building No Action	New Whatcom Redevelopment EIS

4 would also be visible from this location. Views across the site towards the South Hill neighborhood would be similar to the existing conditions, with a greater amount of South Hill visible than under Alternative 1.

The view from viewpoint #3 (**Figure 3.10-36** from the intersection of F Street and Bancroft Street) would include one new mid-rise building surrounded by surface parking and outdoor storage in Area 1 located in the center of the mid-ground view, which would obstruct a small portion of the existing view towards Bellingham Bay. The amount of building area on the site visible from this viewpoint would be substantially less than under Alternative 1, although the overall visual character of the site would reflect a higher density industrial character than under existing conditions. Views across the site of Bellingham Bay and Lummi Island would be greater than under Alternative 1 and would be similar to the existing conditions.

From viewpoint #4 (**Figure 3.10-37** from Maritime Heritage Park), redevelopment in Areas 1 through 4 would appear less dense and at lower buildings heights than under Alternative 1. Because park and open space features would not be provided along the south side of the Whatcom Waterway, buildings would be located in closer proximity to the Waterway than under Alternatives 1 and 2, and similar to Alternative 3. Existing industrial buildings in Areas 2 through 4 remain visible from this location and views of Bellingham Bay and adjacent neighborhoods remain similar to existing conditions.

Because the visual character of the portion of the site visible from viewpoint #6 (**Figure 3.10-38** from Bay Street) currently reflects a developed industrial area, the visual character of the site would not substantially change under the No Action Alternative from this viewpoint. Under the No Action Alternative, the view from viewpoint #6 would include a direct view of a new building within Area 2 at the terminus of the existing Bay Street. Additional new and existing buildings are also viewable in the background to the northwest. No view extension into the site via Bay Street would be provided under this alternative.

The view from viewpoint #7 (**Figure 3.10-39** from the Parkade Parking Structure) would feature primarily mid-rise buildings in Areas 2 through 8 (compared to mid and high-rise buildings in Alternative 1). Existing retained buildings in Areas 2 through 4 would be the tallest structures in the field of view. Views across the site, towards Bellingham Bay and Lummi Island, would remain similar to the existing conditions. New buildings on the site would be generally similar to or lower than the height of buildings in the CBD. The overall change in the visual character of the site from this viewpoint would not be as evident as under Alternative 1.

From viewpoint #11 (**Figure 3.10-40** from the WWU Viking Union Building), redevelopment on the site would appear less dense than under Alternative 1; buildings heights across the site would be lower and paved areas between buildings would be prevalent throughout the site. The tallest buildings within the field of view would continue to be the retained buildings located in Areas 2 through 4. Views across the site of Bellingham Bay and the surrounding neighborhoods would remain generally similar to the existing condition.

Conclusion

Changes in the visual and aesthetic character of the site would occur incrementally over the 20-year buildout period. The character of the site and changes in the visual conditions would thus occur incrementally over time. At full buildout in 2026, development under Alternatives 1

through 3 would substantially change the aesthetic and visual character of the site from its primarily vacant and underutilized industrial condition to a more dense urban form. The density of site redevelopment would decrease from Alternative 1 to Alternative 3, with Alternative 1 representing the greatest mixed-use urban density and building heights, and Alternative 3 representing the lowest level of mixed-use density and building height. The No Action Alternative would represent a more traditional light/marine industrial character.

The effect of the change in site character to a particular viewer would be generally a function of the locational relationship between the viewer and the site. For example, viewers at a similar elevation as the site and/or in close proximity to the site could perceive a substantial change in visual character, including increased building scale and altered views; the potential for obstruction of existing views would also generally be greater for close proximity viewpoints. Conversely, viewers at a higher elevation and/or at a distance from the site could perceive a moderate to limited change in the visual character. At a higher elevation, the viewer's overall view corridor (that often includes more panoramic views) would not be affected to the same degree. For example, views from higher elevations on South Hill (including Western Washington University), the Lettered Streets and the CBD neighborhoods have views that extend beyond the site to Bellingham Bay and more distant vistas; these more panoramic views would not be impacted substantially by New Whatcom redevelopment. Views from closer viewpoints, such as along Roeder Avenue adjacent to the site, would be affected to a greater degree.

The aesthetic and visual character of the majority of the shoreline areas of the site under Alternatives 1 through 3 would change from industrial wharf and bulkhead to public open space containing trails and park open space, as well as some restored natural shoreline area. The extent of park and open space area along the shoreline would be greater under Alternative 1; thus, the visual character of the shoreline would vary between the redevelopment alternatives.

Although the character of the site would substantially change under the EIS Alternatives (including the No Action Alternative), this assessment does not indicate if a particular change in visual character would be adverse. The determination as to whether a particular change could be adverse should be defined by the subjective reaction of an individual viewer. For example, some viewers could perceive the change in character of the site from vacant/industrial to an urban redevelopment with a range of uses (Alternatives 1 through 3) as a negative impact, while others could perceive this change as a positive condition. On an overall basis, positive or negative perceptions related to visual aesthetic character would likely be defined by the quality and consistency of building design, the public spaces that are created and the "pedestrian-friendliness" of the site.

Light and Glare

Alternatives 1 through 3

New temporary sources of light would be introduced to the site during construction activities over the long-term buildout of the site. The lighting sources would be associated with infrastructure and building construction, trucks and other equipment and improvements to building interiors. Lighting associated with construction activities would be limited by City of Bellingham regulations (Bellingham Municipal Code 10.24.120) which limit activities during nighttime hours, thus limiting construction lighting (refer to Section 3.6, **Noise**, for further details on limits to construction). Interior building lighting associated with interior improvements could potentially occur at all hours and could be visible from surrounding areas.

Redevelopment of the site under Alternatives 1 through 3 would add a variety of sources of light and glare to the site. General light sources and lighting types would be similar for all of the Redevelopment Alternatives; however, due to the overall building density assumed for each alternative (highest density level under Alternative 1 and lowest density under Alternative 3), it would also be assumed that Alternative 1 would feature the greatest amount of light and glare on the site, with Alternative 3 providing the least.

In general, new office, industrial, institutional, residential, retail and restaurant uses would result in new light sources on the site, including: interior and exterior building illumination, parking area lighting, street lighting, walkway lighting, parks and trail lighting, marina lighting and vehicular traffic. New lighting associated with redevelopment near the Bellingham Bay and Whatcom Waterway shorelines could include interior and exterior building lighting, marina lighting and parks and trail lighting (considering the greater width of shoreline park area under Alternative 1, the level of potential shoreline lighting would be less under Alternative 1 than under Alternatives 2 and 3). (Refer to Section 3.4, **Plants and Animals**, regarding potential lighting impacts to aquatic habitat.) Light levels would be generally higher in the evenings and during winter months, when there are more hours of darkness. Given the mix of uses including residential, retail and restaurant uses, nighttime lighting levels would be higher. Redevelopment under Alternatives 1 through 3 would result in the elimination of many of the existing sources of light on the site; however, because the overall level of redevelopment on the site and the number of vehicles traveling through the site would be greater than under existing conditions, the overall level of light on the site would be anticipated to increase.

Lighting sources associated with redevelopment on the site would be generally similar to those found in areas to the north and east of Area 1, including: street lighting, vehicular lighting, marina lighting and interior and exterior building illumination. General lighting levels on the site would be somewhat higher than those in the areas to the north and east of Area 1 due to the overall building density assumed for the site, including street lighting and vehicular lighting levels on the site. From areas farther to the north and east, lighting on the site would appear as a continuation of the urban lighting pattern associated with the Lettered Streets neighborhoods. Significant light impacts would not be anticipated.

New light sources on the site would be most similar to those found in the CBD area. The CBD features a similar mix of building uses and densities to New Whatcom redevelopment and produces a steady amount of light throughout the evening, consistent with a downtown environment. Lighting levels on the site would be similar to those found in the CBD and lighting on the site would appear as a continuation of the existing urban lighting pattern associated with this area. Light associated with street lighting and vehicles onsite would also be similar to the CBD. As a result, no significant light impacts would be anticipated.

Lighting levels on the site would be similar to those in the area south of Area 7 and higher than those found in the area south of Area 10. Building heights in Areas 7 and 10 would be lower than the elevation of much of the area to the south; in addition, the existing intervening vegetated bluff could buffer increased lighting on the site (except for the far eastern end of Area 7. Light associated with vehicles on the site would also be at a lower elevation than surrounding uses to the south and would not be anticipated to result in significant impacts. Overall, light on the site would appear as a continuation of the urban lighting pattern in the surrounding area and significant light impacts would not be anticipated.

New sources of glare on the site under the Redevelopment Alternatives could include reflection from building facades and windows and reflections from vehicle traffic. Specific glare impacts would depend upon the degree of reflective surfaces (glass windows) used during building construction. It is likely that buildings containing office and institutional uses would include some degree of glass exteriors and could produce more glare than other uses. The amount of glare generated would be typical of urban development and significant impacts would not be anticipated.

No Action Alternative

Under the No-Action Alternative, temporary sources of light associated with construction would be similar to those described under the Redevelopment Alternatives. Construction activities would be regulated by the Bellingham Municipal Code.

Lighting sources assumed under the No Action Alternative would be similar to those described under the Redevelopment Alternatives but at lower levels due to the lower amount of building density assumed. In addition, the site would not include lighting for parks/trails and lighting levels associated with vehicular traffic would be lower due to the lower onsite activity levels and the lack of onsite residents. In general, nighttime lighting levels would be lower under the No Action Alternative as a result of no residential or commercial uses being provided onsite; industrial uses would generally be closed in the evening times, resulting in lower nighttime lighting levels. However, to the extent that industrial uses on the site include outdoor storage yards (requiring security lighting) or include nighttime activities (including truck shipping), light levels associated with these types of uses could be higher than those under Alternatives 1 through 3. In general, lighting levels assumed under the No Action Alternative would be anticipated to be lower than those in the surrounding area and significant impacts would not be anticipated.

New sources of glare on site under the No Action Alternative would be generally similar to those described above under the Redevelopment Alternatives, but at lower levels due to the lower amount of redevelopment assumed under the No Action Alternative. Significant glare impacts would not be anticipated.

Indirect/Cumulative Impacts

Redevelopment of the New Whatcom site could indirectly spur additional development in the vicinity of the site. Any development in the area generated indirectly by the New Whatcom redevelopment would likely occur incrementally over time and could result in additional aesthetic/visual changes. Any new development would be assumed to occur consistent with the City of Bellingham's standards and regulations, and no significant cumulative aesthetic impacts would be anticipated.

Separate projects are known to be planned in the site vicinity during the 20-year buildout period. These projects include: Bellingham Shipping Terminal improvements; improvements to the south side of the I and J Waterway; improvements to the north side of the Whatcom Waterway; Bellwether on the Bay Phase II; Bayview Towers; and, 1010 Morse Square (for additional details on these projects please refer to **Chapter 2 – Section 2.9**). These projects, in particular Bellwether on the Bay Phase II, Bayview Towers and 1010 Morse Square, would contribute to the urban visual character of the area, and would provide additional light sources and increased

lighting levels within the New Whatcom site vicinity, contributing to the overall lighting pattern in the area.

3.10.3 Mitigation Measures

As indicated earlier, specific building locations, building heights and building design cannot be determined at this stage of the process. For purposes of this Draft EIS analysis, assumptions were made regarding the potential layout of buildings and building heights to conduct a "worst-case" analysis of potential aesthetic and visual impacts from site redevelopment. Actual building footprints, designs, heights, etc. would be determined based on future market conditions and the specific needs of tenants, as well as the provisions of the Master Development Plan, Development Agreement and applicable zoning and development standards and design guidelines that would govern long-term site redevelopment.

The following mitigation measures could be incorporated as part of the Master Development Plan.

- Development standards and design guidelines could be established to include standards for building heights, setbacks, modulation, building materials and provisions for implementation of consistent design guidelines over the long-term redevelopment period.

- Provisions for the establishment of a view corridor(s) through the site could be established as part of the Master Development Plan and/or Development Agreement.

- A substantial portion of the site would be retained in public parks, open space, shoreline vegetation and landscaping to soften the aesthetic character of overall site redevelopment.

- Lighting standards could be developed as part of the Master Development Plan's design guidelines and could include the following:

  - Development standards could place limits on hours of interior and exterior construction lighting.

  - All streets could be well lit for safety and security purposes, meeting standards equal to or greater than those typically required by the City of Bellingham.

  - Lighting for building exteriors, parking lots and circulation routes at the perimeter of the site could be designed with sensitivity to surrounding neighborhoods. Fixtures could be sited in a manner to avoid glare into the surrounding neighborhoods.

  - Informal path and trail lighting could be required to not exceed a maximum height of 15 feet. Use of bollard and ground lighting could be encouraged as an alternative to pole lighting. No uplighting of landscape features or building facades could be allowed.

- Exterior lighting features at the perimeter of the site could utilize appropriate shields to reduce light spillage and security lighting could be directed away from adjacent neighborhoods.

- Encouraging the use of low-reflectivity building glazing and building materials could be incorporated into the Master Development Plan's design guidelines.

- Landscape features and street trees to diffuse or obscure direct light and glare could be provided.

- Timers and other lighting controls to minimize spillover illumination and generally reduce ambient light levels could be considered.

- Lighting adjacent to the shoreline and within the marina could be located close to the ground (2 to 4 feet tall) with light directed downward to illuminate walking surfaces without casting light to the water.

3.10.4 Significant Unavoidable Adverse Impacts

The site has historically been and continues to be a developed site (it does not reflect the character of an undeveloped, natural site). Redevelopment under Alternatives 1 through 3 would change the aesthetic character of the site from a primarily paved vacant/underutilized industrial site to a more dense urban, mixed use development with a range of building heights. Changes in character would occur incrementally over the 20-year buildout period. Under the No Action Alternative, redevelopment would reflect a change in visual character to a more densely developed industrial area.

Redevelopment under the EIS Alternatives would alter portions of certain existing views within the vicinity of the site. The aesthetic/visual changes that would result from redevelopment of the site over the buildout period could be perceived by some to be significant; however, perception regarding such changes would ultimately be based on the subjective opinion of the viewer.

Redevelopment on the site under the EIS Alternatives would result in an increase in light and glare on the site and in the surrounding community. With implementation of mitigation measures no significant light and glare impacts would be anticipated.