3.7 LAND USE

This section of the Draft EIS discusses the pattern of land uses onsite and in the site vicinity and evaluates how the Alternatives would affect these land uses, either directly or indirectly. Section 3.8, **Relationship to Plans and Policies**, of this Draft EIS compares consistency of the Alternatives with relevant Washington State, City of Bellingham and Port of Bellingham land use plans, policies and zoning regulations.

3.7.1 Affected Environment

Historic Land Use

From the time European settlement took hold on Bellingham Bay during the 1850s, the Bellingham waterfront has been utilized as a shipping and industrial area. The first industrial uses were centered on the Whatcom Waterway where the falling water of Whatcom Creek provided gravity power for early sawmills and the channel enabled sailing vessels to traverse the shallow mud flats. By 1891, the Great Northern Railroad completed an over-water trestle that carried tracks on an arc over the tidelands. Wharfs were constructed that extended across the tidelands in a grid pattern to provide access to the train trestle and depot.

During the early 1900s, the Army Corps of Engineers undertook a project to widen and deepen the Whatcom Waterway to accommodate new types and sizes of vessels and to allow ships to dock closer to the city waterfront. As thousands of cubic feet of channel bottom were steam-shoveled out of the waterway, the banks on either side were filled in to create new upland area (generally representing the current configuration of the New Whatcom site Redevelopment Areas 1-9). The expansion of the waterfront area prompted a transition in waterfront operations from the use of narrow piers to larger, broader wharves and encouraged the construction of new mills, warehouses, canneries, foundries, boat factories, and other businesses over the former tideflats.

In 1918, the City of Bellingham constructed a Municipal Dock on the south side of the entrance to Whatcom Waterway. In 1924, the Municipal Dock was acquired by the newly formed Port of Bellingham. The Municipal Dock facility experienced many alterations including the addition of warehouses and dredging to accommodate larger, deepwater vessels. The Municipal Dock was later renamed the Bellingham Shipping Terminal.

Pulp mill and chemical plant operations have occupied the majority of wharf space on the waterfront for the better part of the 20th century. A tissue converting plant operated by the Puget Sound Pulp and Timber Company began operation on the site in 1925 and evolved over the years into a major pulp, paper and chemical complex. Georgia-Pacific acquired the operation in 1963 and added a chlorine plant in 1965. In 1979, Georgia-Pacific constructed an aerated stabilization basin to collect and treat wastewater discharges from the Chlor-Alkali plant that were formerly discharged directly to the Bay. The chemical plant closed in 1999, and the pulp mill ceased operations at the end of 2000.

Georgia-Pacific (GP) sold its waterfront property and aerated stabilization basin to the Port of Bellingham in 2005. The Port of Bellingham acquired the New Whatcom site from GP in exchange for the Port conducting specific environmental cleanup on the site and in the Whatcom Waterway. The site is currently an area in transition; many of the buildings onsite are

currently vacant and Georgia-Pacific is actively moving forward with plans to terminate their operations on the site. As part of their purchase and sale agreement with the Port, Georgia-Pacific agreed to demolish certain existing buildings prior to vacating the site. For the purposes of this analysis it is assumed that "Existing Conditions" includes only those structures scheduled to remain on the site after the completion of the Georgia-Pacific demolition plan (refer to Section 2.8.2 of **Chapter 2** of this Draft EIS for further detail on existing buildings).

As indicated above, portions of the site will undergo site cleanup actions to remediate soil and groundwater contamination associated with historic use. These cleanup actions will be conducted consistent with Model Toxic Control Act (MTCA) requirements administered by Ecology, and implemented in coordination with proposed site redevelopment activities. Cleanup actions for in-water portions of the site or area adjacent to the site, as identified in the Bellingham Bay Cleanup Comprehensive Strategy and Whatcom Waterway Cleanup Site SEIS include actions for: the Aerated Stabilization Basin (ASB), the Outer Whatcom Waterway, the Inner Whatcom Waterway, the Bellingham Bay Shipping Terminal (BST), and the Log Pond area (see **Chapter 2** and Section 3.5, **Environmental Health** for further details on cleanup activities). In addition to the Whatcom Waterway site, six additional MTCA cleanup sites are considered part of the New Whatcom site. These sites include the Chlor-Alkali Facility, Pulp & Tissue Mill, Central Waterfront, I&J Waterway, Cornwall Avenue Landfill, and the R.G. Haley site and will undergo cleanup in coordination with site redevelopment and per the direction of Ecology.

Existing Land Use

Site Character

The general character of the New Whatcom site reflects the industrial maritime uses that have been present on the site over the past approximately 100 years. This industrial character relates to a range of land use activities, including manufacturing, shipping, storage and transportation. However, the specific character of the site varies, with the highest level of activity associated with Area 1 (various industrial uses), Area 6 (Puget Sound Energy Encogen Facility) and Area 9 (BST). The character of Areas 2, 3 and 4 is reflective of previous GP activities; the majority of the buildings in these areas are currently vacant. Areas 7, 8 and 10 are also primarily vacant, reflecting previous storage activities and vehicular circulation uses. In general, this historically maritime industrial site can be considered to be in transition, as much of the site is underutilized and many of the structures on site are currently vacant.

Despite its prominent location between Bellingham Bay and downtown Bellingham, public access to the New Whatcom site (including the waterfront area) is limited due to the past and current industrial activity and the existing railroad corridor, and the site is not perceived as having a direct connection to downtown Bellingham. Vehicular access to the New Whatcom site is limited with street connections available from Cornwall Avenue, Hilton Street, C Street, and Roeder Street. The lack of public connections, in effect, isolates the site from the surrounding community, including the downtown Central Business District. This lack of public connection also holds true for the waterfront area along the site. Despite being located along Bellingham Bay, the New Whatcom site offers only limited opportunities for public enjoyment of the waterfront.

A portion of the existing BNSF railway corridor is located on the site. The railway corridor is located at the south end of the site and currently traverses through Areas 2, 3, 4, 5, 7, 8 and 9. In a sense, the railway corridor divides the site, effectively isolating areas of the site from each other. The Whatcom Waterway is also a dividing feature on the site, effectively separating Area 1 (north of the Whatcom Waterway) from the remaining redevelopment areas of the site (south of the Whatcom Waterway).

Existing Onsite Uses

The approximately 216.3-acre New Whatcom site consists of approximately 148.9 acres of land owned by the Port of Bellingham, approximately 21.2 acres owned by the City of Bellingham and approximately 46.2 acres owned by a number of other entities, including Puget Sound Energy (PSE), the State of Washington (managed by the Department of Natural Resources (DNR)) and Burlington Northern Santa Fe (BNSF). The New Whatcom site also consists of adjacent aquatic areas. Please refer to **Section 2.5.2** and **Figure 2-3** in Chapter 2 for further information on site ownership and an illustration of the site areas comprising the New Whatcom site.

Table 3.7-1 provides a breakdown of the existing conditions in the areas comprising the New Whatcom site. As indicated in **Table 3.7-1**, a majority of the site is paved, with approximately 20.7 acres, or 10 percent of the site in building footprint and approximately 131.4 acres, or 60 percent of the site in paved surface parking or circulation area. The remaining approximately 64.3 acres, or 30 percent of the site consists of other impervious areas, undeveloped areas including the Aerated Stabilization Basin (ASB) and over-water areas (piers, bulkheads, etc). In addition to the 216.3 acres, the site consists of adjacent aquatic area that is included within the area analyzed in the Whatcom Waterway SEIS (see Figure 1-1 of the Whatcom Waterway Final SEIS, 2007).

The following describes the existing land uses currently contained in each specific redevelopment area. For the location of existing buildings on the site please refer to **Figure 2-4**. Please note that the description below includes only those structures scheduled to remain on the site after completion of the Georgia-Pacific demolition plan. It is assumed that most of these remaining buildings would be demolished in the future to accommodate redevelopment (refer to **Section 2.8.2** of Chapter 2 for more information on existing buildings).

Redevelopment Area 1 – The general character of Area 1 reflects ongoing industrial activity and is the most highly used portion of the site. Area 1 contains property and buildings owned by a variety of different entities, including the Port of Bellingham, the City of Bellingham and other private owners. The area contains 12 buildings, totaling approximately 370,900 square feet of marine and light industrial use. Included in these buildings are the GP Tissue Warehouse (Building 11), the Ebanol Building (Buildings 2 and 2A) and the Sanitary Service Commission Building (Buildings 14A and 14B). In addition, a large amount of surface parking and vehicular circulation uses are included in the area, along with approximately 9 acres of undeveloped vegetated area; Hilton Avenue and C Street are also located in this area and run westward from Roeder Avenue. The shoreline areas including the I &J Waterway and Whatcom Waterway are developed with bulkhead and wharf features reflective of maritime industrial uses.

Redevelopment Area 2 – The general character of Area 2 reflects industrial activity associated with GP's previous operations; the existing buildings in this area are or will be vacant,

Table 3.7-1
EXISTING SITE CONDITIONS

	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Area 9	Area 10	Area 11	Total Acreage
Building Footprint	8.2	3.0	0.6	0.9	1.3	1.4	1.1	0.0	2.4	1.8	0.0	20.7
Surface Parking/ Circulation	33.1	15.9	6.5	9.3	4.6	4.6	6.9	21.0	16.5	13.0	0.0	131.4
Street Right-Of-Way	1.0	1.0	0.0	0.0	0.4	0.5	1.2	0.1	0.7	0.0	0.0	4.9
BNSF Railroad Corridor	0.0	1.9	0.2	0.0	1.1	0.0	0.3	3.3	0.1	0.0	0.0	6.9
Vegetated Area	9.1	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0	3.4	0.0	12.7
ASB/Over-water Area	0.0	0.6	0.4	1.2	0.0	0.0	0.0	0.0	1.6	0.0	35.9	39.7
Total Acreage	**51.4**	**22.6**	**7.7**	**11.4**	**7.4**	**6.5**	**9.5**	**24.4**	**21.3**	**18.2**	**35.9**	**216.3**

Source: CollinsWoerman, 2007

Note: ASB/Over-water Area includes bulkheads and wharfs in Areas 1-10 and the existing ASB area in Area 11. It does not include the adjacent aquatic area of the site. Vegetated areas refer to vacant areas containing dirt, grass and other vegetated items.

subsequent to GP's termination of all activities. Area 2 contains property and buildings owned by the Port and a small area of railroad corridor owned by BNSF. The area contains six buildings, totaling approximately 236,809 square feet of previous GP-related uses. These buildings include the Grainary Building (Building 7), the Pulp Screen Room (Building 14) and the Pulp Warehouse/Electric shop (Building 37), all of which were part of GP operations. The portion of this area adjacent to the Whatcom Waterway is highly developed with bulkhead and wharf features reflective of historic maritime industrial uses.

Redevelopment Area 3 – The general character of Area 3 reflects the previous industrial uses of the GP tissue mill operations. Area 3 contains two structures totaling approximately 107,800 square feet. The buildings include the Digester Building (Building 13) and the Alcohol Plant Building (Building 17). Both of these buildings are currently vacant. The portion of this area adjacent to the Whatcom Waterway is highly developed with bulkhead and wharf features reflective of historic maritime industrial uses.

Redevelopment Area 4 – The general character of Area 4 reflects previous industrial uses of the GP operations. Area 4 contains three buildings totaling 107,200 square feet. Buildings in this area were used as part of the former GP operations and include the Board Mill Building (Building 12A), the Barking and Chipping Building (Building 8) and the Chip Bins Building (Building 9). These buildings are all currently vacant. A portion of the BNSF railway corridor runs adjacent to the western boundary of this area. The shoreline portion of this area is developed with bulkhead/wharf and former log pond features reflective of previous maritime industrial use.

Redevelopment Area 5 – The general character of Area 5 reflects past industrial and office use. The area includes the approximately 51,800-square foot Lignin Powder Building (Building 19)

which was formerly used by GP and the 921 Cornwall Building (Building 50) which is currently used as an office building by the Port. These two buildings and adjacent paved areas comprise a majority of this area.

Redevelopment Area 6 – The general character of Area 6 is reflective of the ongoing power plant operations. This redevelopment area contains buildings associated with the PSE Encogen power plant; the majority of this area is in hardscape (paved, impervious surfaces).

Redevelopment Area 7 – The general character of Area 7 is reflective of ongoing warehouse activities. Area 7 contains one building, the 48,000 square foot 800 Cornwall Warehouse (Building 18). The area is made up entirely of hardscape impervious surfaces.

Redevelopment Area 8 – Area 8 is vacant and entirely in paved parking and other impervious surface. No buildings are currently located within this area. The shoreline portion of this area is developed as a former log pond area reflective of previous industrial use, and currently contains natural beach features.

Redevelopment Area 9 – The general character of Area 9 is reflective of current shipping and warehouse activities. Area 9 is primarily in hardscape and building area. The Bellingham Shipping Terminal is located in the northern portion of this area and is operated by the Port for large ship docking and loading/unloading activities. Four buildings, totaling 105,200 square feet, are currently located in this area including a Port of Bellingham office (Building G) and maintenance building (Building H) and two warehouses (Buildings I and J). A majority of the area is used for surface parking and internal site circulation. A portion of the BNSF corridor runs through this area. The majority of the shoreline edge of this area adjacent to Bellingham Bay is in bulkhead, wharf and pier.

Redevelopment Area 10 – Area 10 is generally developed in the eastern portion and undeveloped in the western portion. Five buildings, totaling approximately 61,150 square feet, associated with the former RG Haley Wood Products Treatment operations (Buildings E1, E2, E3, E4 and E5) are located in the eastern portion of this area. The western portion of the area contains paved/gravel area and grass/vegetated area. The majority of the shoreline is undeveloped, with a small pocket beach located at the end of Cornwall Avenue in the eastern portion of this area; this beach is used as an informal recreation area.

Aerated Stabilization Basin – The 35.9 acre Aerated Stabilization Basin (ASB) was used to treat wastewaters associated with GP operations and currently treats process water from the PSE Encogen power plant.

In addition to the 11 redevelopment areas, the New Whatcom site also consists of adjacent aquatic area.

Site Vicinity

Land Use Character

The general site vicinity of the New Whatcom site is composed of Bellingham Bay to the west, a portion of the Central Business District and Columbia neighborhoods to the north, the Lettered Streets and Central Business District neighborhoods to the east, and the Sehome and South Hill neighborhoods to the south. These neighborhoods are comprised of a number of different land

uses including industrial, commercial, single-family and multifamily residential, marine and mixed uses. The general land use pattern of the area surrounding the New Whatcom site is varied, consisting of commercial, residential, industrial, marine and institutional uses.

The primary concentration of commercial, retail and office uses is located to the east of Areas 2 and 5 of the site, across Roeder Street, in the City of Bellingham's Central Business District neighborhood. The area contains a variety of large and small scale commercial/office buildings, retail, residential and mixed use buildings; this area is generally considered downtown Bellingham. Further north of the Central Business District (across Whatcom Creek) and immediately east of Area 1 is the Lettered Streets neighborhood which includes industrial, low-level office and commercial, multifamily and single-family residential uses. The western portion of this neighborhood, adjacent to Area 1 of the New Whatcom site is classified as the Old Town District Village, a Tier 2 Urban Village in the Bellingham Comprehensive Plan. This area is considered to be potentially in transition as the Comprehensive Plan identifies it as an area that is likely to experience redevelopment over the next 20 years (see Section 3.8, **Relationship to Plans and Policies** for further details on Urban Villages).

The area to the north of the site (north of the I&J Waterway) is generally characterized by marine and industrial uses, but also includes some recently developed commercial and retail use buildings, including the "Bellwether on the Bay" mixed-use development. The Bellwether on the Bay development includes hotel, office, restaurant and retail uses and serves as a new destination spot in the greater Bellingham area. This development is linked to recreational and marina uses directly to the west, that provide public access opportunities to the waterfront and surrounding neighborhoods. A second phase of the Bellwether on the Bay development is currently being planned by the Port; a permit application for this second phase of development has been submitted to the City. Mixed-use development, including retail, office and residential uses is proposed (see the **Indirect/Cumulative Impacts** discussion for further information on this proposed development). The BNSF railroad corridor is located in this area and runs adjacent to Roeder Avenue. Residential uses are located further northeast along the hillside and beyond Eldridge Avenue.

Much of the area to the south of the site (south of Areas 7 and 10) is topographically separated from the site by a bluff. Single-family and multifamily residential and low-level commercial uses comprise the land use character of this area. The South Bay Trail, a 2.3-mile multi-use trail, runs adjacent to the southern border of the site along the bluff (see Section 3.13, **Public Services**, for additional information on this trail). Single-family and multifamily residential uses and Western Washington University dominate the area further south. See **Figure 3.7-1** for a map of existing land uses in the vicinity of the New Whatcom site.

Specific Land Uses Surrounding the Site

To the immediate north of the site, beyond the I & J Waterway, are commercial, marina and marine industrial uses and surface parking. Included in this area is the Bellwether on the Bay development (constructed in 2000), a 3-story hotel/retail/office building complex which includes the Hotel Bellwether, offices, retail shops, and restaurants. Also in this area is the Port of Bellingham's Squalicum Harbor Marina, which includes 1,417 moorage slips located in two separate moorage basins; several office and commercial buildings are located east of the marina. The area further to the north and northwest, across Roeder Avenue and on top of the bluff, are dominated by single-family and multifamily residential uses.

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Figure 3.7-1
Existing Land Uses

New Whatcom Redevelopment EIS

To the immediate east of Area 1, beyond Roeder Avenue, are low-level commercial, industrial and multifamily residential uses. The Lottie Roth Block, a 4-story apartment building listed on the National Register of Historic Places and the Washington Heritage Register is located in this area along W Holly Street and G Street. Additional multifamily residences and low-level commercial uses are also located along W Holly Street. Industrial uses are located further south of this area, including the main yard for Northwest Recycling. Single-family residential uses are located further east in this area. In general, this area to the east of Area 1 is potentially in transition as the Bellingham Comprehensive Plan identifies it as an Urban Village likely to experience redevelopment over the next 20 years (see Section 3.8, **Relationship to Plans and Policies** for further details on Urban Villages).

The City's Central Business District (CBD) is the dominant cultural, civic, financial and service center for the community and serves as the primary commercial hub, civic/governmental center and destination location for the City of Bellingham and Whatcom County. The CBD is located to the east of Areas 2 and 5 and is comprised of a variety of urban uses, including: commercial, office, retail, government, and multifamily residential uses. Low-level commercial, multifamily residential and surface parking lots are located immediately adjacent to the site. Further east, across Roeder Avenue and W Chestnut Street, in the CBD, are several two to four-story office/commercial and mixed use buildings and other low-level commercial buildings, such as retail stores, restaurants and banks. This area of the CBD also contains some of the tallest buildings in downtown Bellingham, including several office and mixed use buildings. Government uses in this area include: the Whatcom County Courthouse, the Whatcom County Public Safety Building, a post office and the Bellingham Federal Building which includes a post office, IRS and Customs services. As indicated earlier, onsite industrial activity, the intervening railroad corridor and lack of public connections have isolated the New Whatcom site from the CBD.

The area to the south of Area 7 contains mostly multifamily residential and low-level commercial uses such as grocery stores, restaurants and other retail uses. Immediately adjacent to this portion of the site are multi-story mixed use and multifamily residential buildings. The South Bay Trail, an approximately 2.3 mile multi-use trail, also runs along the southern portion of this area and the trail, along with a vegetated area associated with the trail, serve as a buffer between Area 7 and adjacent uses to the south.

The area to the south of Area 10, along N State Street and beyond, is separated from this area by an approximately 70 to 100-foot high bluff. The offsite area above the bluff is primarily characterized by multifamily and single-family residential uses. The South Bay Trail traverses the bluff in an east/west direction. Further south is Western Washington University and additional single-family and multifamily uses, many of which are occupied by students of the university.

Shoreline Environment

The shoreline areas of the site are reflective of industrial and maritime uses, including numerous over-water bulkhead and wharf features. The shoreline has been intensively used as a working waterfront; the shoreline environment is not currently conducive to public use or enjoyment. Over-water features include: a bulkhead/wharf that runs along the north and south side of the Whatcom Waterway, along the edges of Areas 1, 2, 3, and 4; bulkhead/wharf features along the I&J Waterway on the north edge of Area 1; and, over-water piers associated with the Bellingham Shipping Terminal in Area 9. Natural shoreline features exist along the north portion

of Area 8 and the west portion of Area 10. As part of the City's Shoreline Master Program update process, the City conducted a comprehensive inventory and characterization of their shoreline areas, including areas adjacent to the New Whatcom site. The City's inventory contains an analysis of each of the City's shoreline areas and includes environmental characteristics such as the overall landscape setting, geologic and soil conditions. Current land uses are also described including the types of uses in the vicinity and overall development patterns (City of Bellingham 2004 Shoreline Characterization and Inventory). The shoreline uses described above are consistent with the City's inventory.

Despite its close proximity to the water, the New Whatcom site does not provide opportunities for public access to the site and the shoreline. Access to the site itself is limited to two locations: via Cornwall Avenue or Roeder Street. Access to the waterfront and shoreline from upland area is available at only one location, via a small pocket beach located at the western terminus of Cornwall Avenue between Areas 9 and 10. Existing built features including buildings, railroad corridor, bulkheads and piers inhibit shoreline access throughout much of the site.

Building Characteristics (Height and Bulk)

Site

The general building character of the New Whatcom site is varied, with portions of the site in vacant industrial buildings, portions in active Port and utility use, and portions of the site in underutilized surface pavement; approximately 90 percent of the upland portion of the site is either in underutilized pavement surface or in vacant buildings. As indicated earlier, the site is in transition with the majority of the buildings on the site being vacant. The following summarizes the building characteristics by individual redevelopment area (Please note that the description below includes only those buildings that will remain on the site subsequent to completion of the planned demolition by Georgia-Pacific).

Redevelopment Area 1 – Area 1 contains the largest concentration of buildings on the site. Buildings in this area are primarily single story; the largest building in this area is the approximately 250,000 square foot GP Tissue Warehouse (although single-story, this warehouse building is approximately 50 feet in height). Total building square footage in this area is approximately 371,000 square feet.

Redevelopment Area 2 – Area 2 contains a high concentration of buildings including six industrial buildings associated with the GP operations. Buildings in this area are primarily brick buildings ranging from one to three-stories in height. The largest building in Area 2 is approximately 108,000 square feet. Total building square footage in this area is approximately 237,000 square feet.

Redevelopment Area 3 – Area 3 includes two industrial buildings associated with GP operations on the site. The buildings range from three to six stories in height (approximately 70 to 150 feet tall) with the largest being approximately 67,000 square feet. Total building square footage in this area is approximately 108,000 square feet.

Redevelopment Area 4 – Area 4 contains three industrial buildings associated with GP operations. Two of the buildings are primarily brick structures ranging from two to three stories in height (the tallest of which is approximately 48 feet tall); the remaining building is an approximately 67-foot high cylindrical concrete building. The largest building in this area is

approximately 51,000 square feet. Total building square footage in this area is approximately 107,000 square feet.

Redevelopment Area 5 – Area 5 includes two buildings, one of which is industrial in nature, the other is used as office and meeting space for the Port. The buildings range from one to two stories in height, with the largest being an approximately 52,000-square foot industrial building. Total building square footage in this area is approximately 58,000 square feet.

Redevelopment Area 6 – Area 6 consists of structures associated with the PSE Encogen Power Plant. These structures total approximately 60,000 square feet.

Redevelopment Area 7 – Area 7 includes one, single-story, 48,000-square foot warehouse building.

Redevelopment Area 8 – No buildings are located within Area 8.

Redevelopment Area 9 – Area 9 consists of four buildings associated with the Bellingham Shipping Terminal operations. Included in this area are two warehouse buildings, a Port of Bellingham office building and a Port maintenance building. The largest buildings in this area are the warehouse buildings at approximately 45,000 and 41,000 square feet each; total building square footage in this area is approximately 105,000 square feet. All of the buildings in this area are single-story buildings.

Redevelopment Area 10 – Area 10 consists of five single-story buildings; the majority of which are clustered in the eastern portion of this area. The buildings are industrial buildings associated with the former RG Haley Wood Products operations; these wood structures are approximately two to three-stories. The largest building in this area is an approximately 24,000-square foot building associated with the RG Haley facility; total building square footage in this area is approximately 61,150 square feet.

Aerated Stabilization Basin – This area consists of the Aerated Stabilization Basin, and no structures are located within the ASB.

Site Vicinity

The general building character to the north of the site, across the I&J Waterway from Area 1, is reflective of commercial, marine and marine industrial uses. The buildings are low-rise structures (one- to four-story buildings) with a large portion of the area dedicated to surface parking and marina facilities. Newer construction in the area includes the three-story Bellwether on the Bay hotel/commercial development and an Anthony's Restaurant. To the northeast of Area 1, across Roeder Avenue, residential structures along the hillside and farther east are primarily one- to three-stories in height.

Buildings to the east of Area 1, across Roeder Avenue, are primarily single-family and multifamily residential, commercial (retail or office) or industrial in nature. The buildings are low-rise, with the tallest being the four-story Lottie Roth Block apartment building. Newer construction in the area includes two to three-story multifamily residential buildings located on the west side of W Holly Street, overlooking the site and Bellingham Bay. Northwest Recycling operates out of several buildings in this area as well. These buildings are primarily metal-sided

industrial storage type buildings. Lower scale single-family residences are located farther to the east.

The general building character to the east of Areas 2 and 5, across Roeder Avenue and W Chestnut Street, is reflective of commercial (retail and office), mixed use and multifamily residential uses associated with the Central Business District. Most of the buildings in this area are low-rise buildings (retail, restaurant, mixed use, banking); however, several larger scale buildings are located within the Central Business District. These buildings include a 14-story 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 office building (located on N State Street), a six-story office building (located on Bay Street), and a five-story commercial building (located on Cornwall Avenue). Newer construction in the area includes several two- to four-story mixed use and commercial buildings (primarily located along Cornwall Avenue). In addition to these newly constructed buildings, two new residential towers are proposed to be constructed in this area; the Bayview Towers a 23-story residential building (located on State Street), and the 1010 Morse Square, an 18-story residential building (located on Maple Street). Refer to the **Indirect/Cumulative Impacts** discussion of this chapter for further details on these two proposed projects.

Buildings to the south of Area 7 are generally commercial (retail and restaurant) and multifamily residential in nature. A majority of the buildings are low-rise buildings between one- and five-stories in height. Multifamily residential and mixed use buildings along N State Street and N Laurel Street are the tallest in the area ranging from four to five-stories in height.

Buildings to the south of Area 10 are generally multifamily and single-family residential in nature. Multifamily residential buildings on the hillside along Boulevard Street and N State Street are generally the tallest structures in this area ranging from three- to five-stories in height. Further south are primarily two- and three-story residential uses and the Western Washington University campus.

Existing Land Use Designations

Comprehensive Plan

Site

The New Whatcom site is currently designated in the Bellingham Comprehensive Plan as Industrial/Waterfront Mixed Use. This designation is consistent with the existing industrial uses located on the site, and allows conversion to Waterfront Mixed Use pending the adoption of a Master Development Plan. The industrial land use designation is intended to preserve industrial land for a variety of uses ranging from light industrial (research and development and marine industrial) to heavy industrial (manufacturing, warehousing, assembly and distribution of goods). Other industrial areas in the City are located in the Sunnyland, Roosevelt, Mount Baker, Guide Meridian, Cornwall Park, and Fairhaven Neighborhoods. The Waterfront Mixed Use designation for the site is designed to encourage the creation of intensely developed mixed use areas where infrastructure, transit and other public facilities or services are available or can be provided. They are intended to provide job opportunities and housing to allow people to work, shop and recreate where they live (see Section 3.8, **Relationship to Plans and Polices** for further

discussion on the Comprehensive Plan designation). See **Figure 3.7-2** for a map illustrating the existing Comprehensive Plan designations.

The Bellingham Comprehensive Plan also includes policies that encourage growth in compact urban centers (or villages) while preserving the character of existing single-family neighborhoods. The Comprehensive Plan includes specific polices regarding these urban centers/villages; included in the Comprehensive Plan is a ranking of urban centers based on how likely the urban center is to be intensively developed during the 20-year planning period. The rankings range from Tier 1 (most likely) through Tier 5 (least likely) and are based on the degree of regulatory changes and amount of redevelopment of existing uses needed to achieve the urban centers/villages concept. The portion of the New Whatcom site located north of the Whatcom Waterway is identified as the Central Waterfront Urban Village, which is designated as a Tier 2 Urban Village; the portion of the site located south of the Whatcom Waterway is a part of the CBD Core Village, which is designated as a Tier 1 Urban Village (see Section 3.8, **Relationship to Plans and Policies**, for further discussion of urban centers).

Site Vicinity

The area to the north and east of the New Whatcom site, in the Central Business District and Lettered Streets neighborhoods, is designated Commercial and Residential Multifamily. The Commercial designation is designed to provide a range of commercial development intensities and a broad range of services, while the Residential Multifamily designation is intended to provide higher concentrations of people within the City, with a mixture of housing types, public uses, office uses and limited neighborhood commercial uses. The area to the south of the New Whatcom site, in the Sehome and South Hill neighborhoods, is primarily designated as Residential Multifamily, Residential Single Family and Public. The Residential Single Family designation is intended for the development of individually owned dwelling units. The Public designation is applied to major parcels of land that are owned or leased by public agencies (in this case Western Washington University). See **Figure 3.7-2** for a map illustrating existing Comprehensive Plan designations in the New Whatcom site vicinity.

Two urban centers are located within the vicinity of the New Whatcom site. The City Center Core Village is located to the east of the site in the CBD and is designated as a Tier 1 Urban Village. The Old Town District Village is located on the west side of the Lettered Streets neighborhood and is designated as a Tier 2 Urban Village (see Section 3.8, **Relationship to Plans and Polices**, for further details on urban centers and villages).

Zoning

Site

Zoning classifications and zoning district regulations are established for each individual neighborhood in the City of Bellingham Land Use and Development Code (2004). Each neighborhood is divided into various areas with each area containing a specific zoning designation, use qualifier, density, special conditions, prerequisite conditions and special regulations.

The New Whatcom site consists of areas 2B, 4, 11, 15, 17, 20 and 21, all located in the Central Business District Neighborhood. The zoning classification of these areas is Industrial/Waterfront

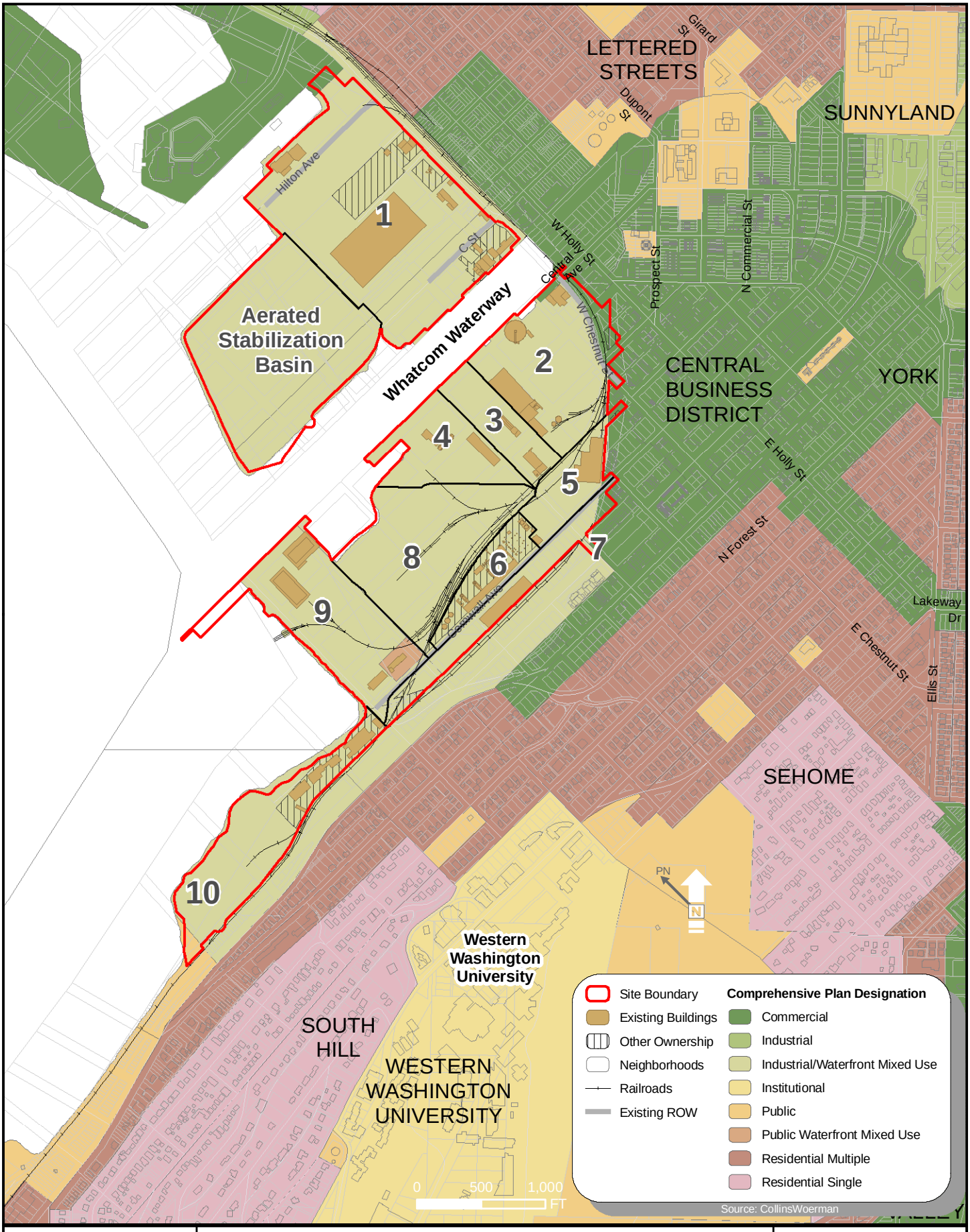

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Figure 3.7-2
Existing Comprehensive Plan Designations

New Whatcom Redevelopment EIS

Mixed Use, with the exception of area 20 which is zoned Public/Mixed Use. The Industrial zoning on the site includes Light Industrial (area 17), Marine Industrial (area 4, 11 and 21), and Heavy Industrial (area 2B and 15). See **Figure 3.7-3** for a map illustrating the zoning classifications on the New Whatcom site and site vicinity. The Industrial/Waterfront Mixed Use zoning classification indicates that the Industrial and Public zoning of the site is in effect until a Master Development Plan is adopted. If the Master Development Plan is adopted, the area will be zoned Waterfront Mixed Use.

The Light Industrial designation is intended to accommodate uses which are not compatible with uses allowed in the Central Commercial areas but which do not create noise, smoke, odors or other objectionable nuisances to the extent that they may be detrimental to each other or to surrounding areas. The types of uses permitted in the Light Industrial zone include: warehousing and wholesaling establishments, manufacturing and assembly, retail sales, offices, eating and/or drinking establishments, service establishments, agricultural nurseries, advertising devices, animal hospitals (small), transportation and public utilities, construction businesses and uses similar to the above.

The Heavy Industrial designation is intended to accommodate uses which may create a higher degree of hazard or annoyance than those permitted in any other land use classification. Certain uses such as residential and retail businesses are not permitted in order to ensure that heavy industries locate in areas where their operation will neither be injurious to, nor hindered by, these uses. Permitted uses in the Heavy Industrial zone include: warehousing and wholesaling establishments, manufacturing and assembly, retail trade, advertising devices, transportation and public utilities, construction businesses and uses similar to the above.

The Marine Industrial designation is intended to reserve scarce waterfront land for those water dependent or water related industries which require waterfront locations. Marine Industrial permitted uses include manufacturing of water related goods, transportation and public utilities, other uses pertaining to storage, construction or manufacturing of any products dependent on water transport, eating and/or drinking establishments, public parks, beaches or aquariums, museums, art galleries, botanical and zoological gardens and uses similar to the above.

The Public designation is intended to apply to major parcels of land within the city limits which are owned by public agencies and used for public purposes. The public general use type recognizes the fact that public agencies, in attempting to serve the general public have unique needs which cannot be adequately addressed through standard zoning legislation. The public general use type also recognizes that adjacent property owners should be aware of potential use of neighboring public land and have assurance of minimum performance standards. Permitted uses in the Public zoned land on the New Whatcom site include offices, personal and professional services, eating and drinking establishments, retail sales, museums, art galleries, parks and recreation facilities, fitness clubs, schools, and other public and private educational facilities, and institutional uses.

Specific permitted uses for the Waterfront Mixed Use zoning classification for the site would be established by the Master Development Plan adopted by the Port and City.

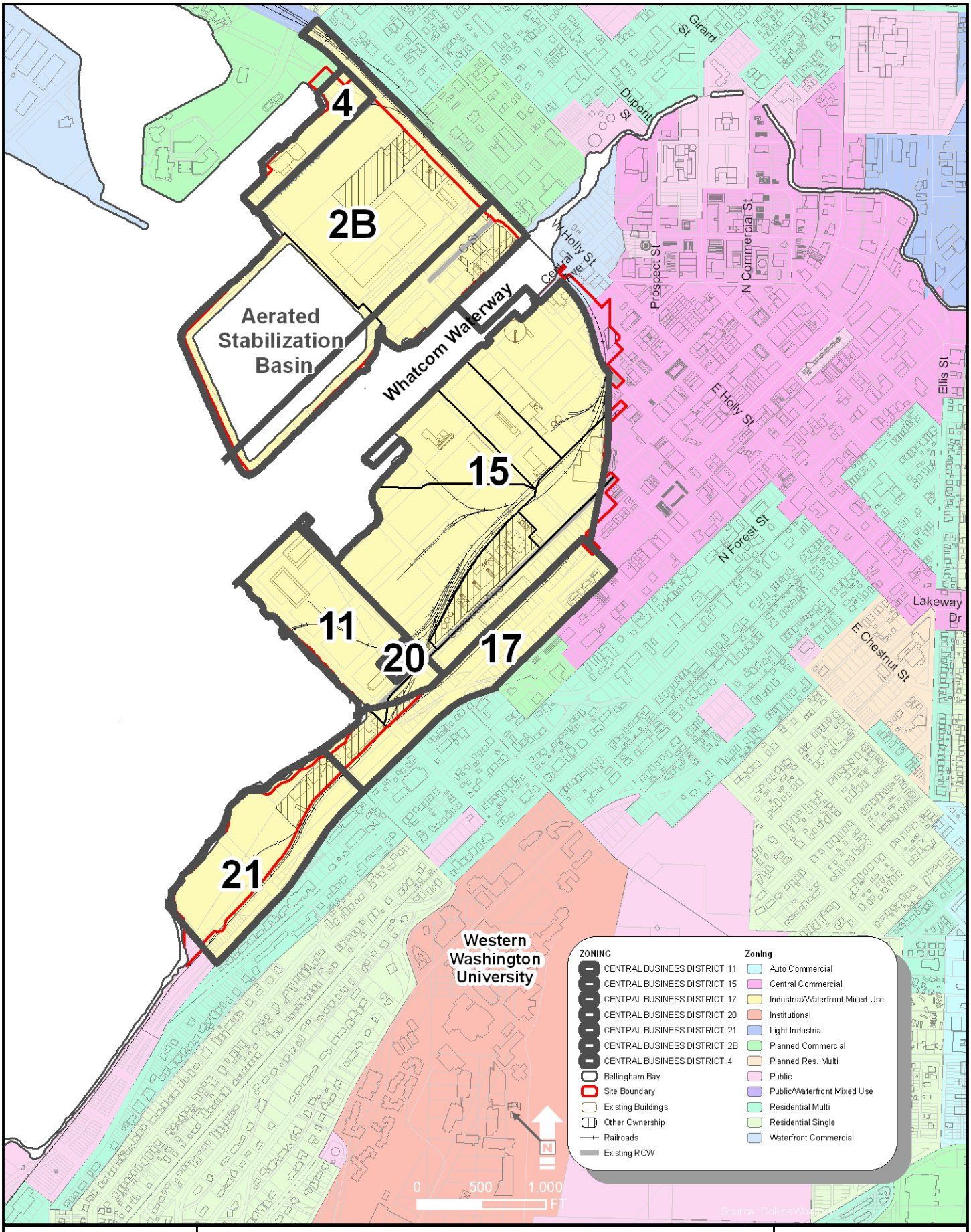

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Figure 3.7-3
Existing Zoning

New Whatcom Redevelopment EIS

Site Vicinity

The area immediately north of the New Whatcom site is primarily zoned as Waterfront Commercial, Planned Commercial and Light Industrial. Permitted uses in the Waterfront Commercial zone include: restaurants, hotels, theaters, retail, and water-dependent commercial uses (marina, boat storage, boat building, fish processing); the Planned Commercial zone allows mixed uses including water dependent and related uses (retail, hotel, fisherman's market moorage, cruise terminal, offices), and has specific design parameters for this area (area 7 of the CBD). As described above, permitted uses in the Light Industrial zone include warehousing, manufacturing, retail, office and other service establishments. See **Figure 3.7-3** for a map of the zoning classifications on the New Whatcom site and in the site vicinity.

The area to the east of the site includes portions of the Lettered Streets and CBD neighborhoods and is primarily zoned as Central Commercial, Planned Commercial and Residential Multifamily (multiple and mixed). Permitted uses in the Central Commercial zone include retail, offices, banks, restaurants and hotels. The Residential Multifamily Multiple zone allows single-family dwellings with less than 5,500 square feet of floor area, duplexes and multifamily units and office uses.

The area immediately south of the site includes portions of the Sehome and South Hill neighborhoods and is primarily zoned as Residential Multifamily (multiple, duplex and mixed) Planned Commercial and Central Commercial. The Residential Multifamily Duplex zone allows single family dwellings less than 5,500 square feet in floor area, duplexes, public parks and trails and accessory dwelling units.

Shoreline Master Program Designation

The shoreline jurisdiction areas of the New Whatcom site (i.e. generally the area within 200 feet of the Ordinary High Watermark – OHWM) are currently designated by the existing City of Bellingham Shoreline Master Program (SMP) as an Urban Maritime environment. The intent of the Urban Maritime environment is to preserve land for activities that require access to navigable waters. The City of Bellingham is currently in the process of updating the Shoreline Master Program, with City Council adoption expected to occur in 2008. The Draft SMP update designates the shoreline jurisdiction of the site as the "New Whatcom Designation" in order to implement "Special Area Planning", to address the current New Whatcom master planning process, incorporate public comments and comply with the State of Washington's Shoreline Management Act. "Special Area Planning" is intended as a regulatory tool used to allow governments to address shoreline management issues on complicated sites where a range of issues must be addressed (refer to Chapter 2, **Description of Proposed Actions and Alternatives**, and Section 3.8, **Relationship to Plans and Policies**, for a detailed discussion on the Shoreline Master Program and its relationship to the site).

3.7.2 Impacts

Introduction

Proposed Actions related to the redevelopment of the New Whatcom site[1] include: approval of amendments to the Port's *Comprehensive Scheme of Harbor Improvements*, development and approval of a Master Development Plan for the site, approval of a Development Agreement between the Port of Bellingham and City of Bellingham, adoption of a "Subarea Plan" and development regulations by the City and adoption of a Planned Action Ordinance. Approval of the Proposed Actions would allow for the transformation of the New Whatcom site from a primarily vacant and underutilized industrial site that is currently separated from the surrounding community, to a new neighborhood with a mix of uses and open spaces that are connected to and integrated with the surrounding community. Redevelopment of the New Whatcom site would generally represent an extension of the site and waterfront to the downtown area, and would provide opportunities for public access and public amenities that are not currently available.

For the purposes of environmental review, three Redevelopment Alternatives, one sub-alternative, and a No-Action alternative are analyzed to represent a full range of land use intensities and densities that the site could accommodate. The Draft EIS focuses on two redevelopment time periods: 2016, which represents an interim redevelopment stage, and 2026, which is assumed to represent full build-out of the site. The specific layout of uses and building footprints cannot be determined at this time; therefore, for the purposes of this Draft EIS analysis, assumptions were made regarding the potential mix of uses and level of redevelopment that could occur during the build-out period in order to address potential on and offsite land use compatibility issues on a "worst-case" basis. It should be noted that as part of the ongoing master planning and decision-making process, a different mix and configuration of land uses within the range of alternative redevelopment scenarios will likely be selected as the Master Development Plan by the Port and the City (and features of the Alternatives could be mixed and matched to arrive at the Master Development Plan). For example, the type and density of land uses could be ultimately mixed and matched with the level of infrastructure improvements and park and open space acreage as part of the Master Development Plan process; it is expected that the parameters reflected in the adopted Master Development Plan would be within the range of assumptions and impacts tested in this EIS (refer to **Section 2.8** of Chapter 2 for more information on the mix and match concept).

It is assumed that the basic infrastructure concept for roadways, utilities and parks would be generally similar for the Redevelopment Alternatives (Alternatives 1 through 3) although the number of roadway improvements and acreage of public parks and open space would differ somewhat. For example, Alternative 1 (Higher Density) assumes the greatest number of roadway connections to the surrounding roadway system and largest park acreage, and Alternative 3 (Lower Density) assumes the fewest roadway connections and lowest amount of park acreage; however, in general the onsite roadway system is similar under all the Redevelopment Alternatives (Alternatives 1 through 3). The pedestrian circulation improvement assumptions are generally similar among the Redevelopment Alternatives, although features

[1] For master planning and EIS purposes, inclusion of private properties within the New Whatcom site is assumed. These privately owned properties are included in this EIS to allow full analysis of land use and environmental implications of potential redevelopment and changes in the land use of these properties, relative to New Whatcom redevelopment and the surrounding area.

such as the pedestrian bridge over the Whatcom Waterway would only be provided under Alternatives 1 and 2/2A, and the Broadway Pedestrian Connection would only be provided under Alternative 1 (refer to **Chapter 2** for a detailed description of each EIS Alternative).

Because the basic roadway network under Alternatives 1 through 3 is assumed to be similar, the general location of future buildings is also assumed to be generally similar under the Redevelopment Alternatives, with the difference in building square footage due primarily to building height and the provision of parking either within structures or surface lots. For example, the higher level of redevelopment assumed under Alternative 1 is generally a result of taller buildings compared to lower building heights under Alternative 2/2A and 3. Because the area available for building redevelopment is assumed to be similar under all of the Redevelopment Alternatives, the higher density in Alternative 1 is generally accommodated by taller buildings (redevelopment potential in the shoreline area is assumed to vary among the alternatives; see the Shoreline Use discussion below). **Table 3.7-2** summarizes the existing land uses on the site and the assumed land uses under the EIS Alternatives.

Compared to existing conditions, redevelopment under Alternatives 1 through 3 as illustrated in Table 3.7-2 would increase the total acreage of building footprint (including structured parking), roadways and public parks/trails/habitat area. Because the vast majority of the site is currently in impervious surface (consisting primarily of buildings and surface parking/circulation), redevelopment under EIS Alternatives 1 through 3 would result in less impervious hardscape and more vegetated open space and parks than under existing conditions.

Table 3.7-2
SITE LAND USES UNDER EIS ALTERNATIVES (2026)

Site Use	Existing Conditions	Alternative 1	Alternative 2	Alternative 2A	Alternative 3	No Action Alternative
Building Footprint	20.7	45.6	45.8	45.8	41.2	44.6
Structured Parking	0.0	17.4	11.9	11.9	8.9	0.0
Surface Parking	131.4	15.9	23.7	23.7	32.8	44.9
Street Right-Of-Way	4.9	39.2	34.8	39.0	34.8	10.0
BNSF Railroad Corridor	6.9	3.7	3.7	2.5	6.9	6.9
Other Impervious Area	0.0	9.8	10.9	10.9	10.2	61.3
Parks, Trails and Habitat Area	0.0	33.2	23.8	23.8	15.0	0.0
Vegetated Area	12.7	18.7	32.8	28.5	33.7	12.7
Water/Over-water Area	39.7	32.8	32.8	32.8	32.8	35.9
Total Acreage	216.3	216.3	216.3	216.3	216.3	216.3

Source: CollinsWoerman, 2007

Note: Water/over-water area includes bulkheads and wharfs in Areas 1-10 and the ASB under Existing Conditions and relates to the ASB/Marina area under Alternatives 1-4. Other impervious area includes setbacks, sidewalks, plazas, building separation and marine yard. Vegetated area includes landscaped areas and outdoor public/private green spaces. In addition to the 216.3 acres identified above, the site also includes adjacent aquatic area.

The types of direct land use impacts that could potentially occur under the EIS Alternatives generally relate to construction impacts, displacement of existing uses, conversion of land uses, increase in site density, changes in activity levels (i.e. increased noise, traffic and pedestrian activity), and compatibility of new land uses on the site with existing site uses and surrounding land uses. Indirect land use impacts that could occur include the potential for increased pressure for off-site development and/or changes in the overall land use character of the area, as well as land use effects on the surrounding neighborhoods, particularly the downtown Bellingham core. Construction impacts relate to impacts to onsite and vicinity land uses from construction activities onsite. These types of impacts are discussed below for all Redevelopment Alternatives. Impacts generated from changes in the visual and aesthetic character of the site are discussed in Section 3.10, **Aesthetics/Light and Glare** and discussion on the relationship between the Proposed Actions and applicable land use plans and policies is contained in Section 3.8, **Relationship to Plans and Policies**.

Construction Impacts

Future redevelopment assumed under the Redevelopment Alternatives (Alternatives 1-3) would consist of four primary activities: 1) demolition of existing buildings, demolition of existing utilities and paved areas and removal of certain wharf and bulkhead features; 2) construction of new site infrastructure, including primary roadways, utilities and parks/trails; 3) construction of new buildings and associated parking; and, 4) construction of marine infrastructure and facilities, including marina floats, and provision of new aquatic habitat and shoreline restoration.

In addition, several portions of the New Whatcom site are undergoing or will undergo site cleanup actions to remediate soil and groundwater contamination associated with historical uses. Consistent with the state MTCA cleanup regulations overseen by Ecology, cleanup methods and plans will consider future mixed use redevelopment of the site, and will include institutional control requirements to be implemented as part of site redevelopment (refer to Section 3.5, **Environmental Health**, for a discussion on the relationship between site cleanup actions and construction activities under Alternatives 1 through 3).

Site preparation and infrastructure development (including roads and utilities) would generally occur commensurate with development of specific building projects over the approximately 20-year assumed buildout. However, development of certain roadway connections, stormwater system features and public park/trail/habitat features could occur prior to specific building development.

The sequencing of construction activities would depend on the specific extent and timing of infrastructure improvements such as primary new roadways and public park/trail features, as well as on future market conditions and estimated absorption rates for office, retail and residential uses; for purposes of environmental review, it is assumed that approximately 50 percent of site redevelopment would occur by 2016, with full buildout by 2026. The majority of site infrastructure, including roadway and utility systems, would likely be phased over time to support phased construction of buildings and parking.

Construction of new bridge connections to serve the New Whatcom redevelopment would require some offsite construction; because the specifics of bridge design are not known at this time, additional environmental review could be required at the time that applications for construction permits for the bridges are submitted. It is anticipated that bridge construction

would result in temporary impacts to adjacent uses, including air pollution (dust and emissions), noise and increased truck trips (refer to **Sections 3.2, 3.6** and **3.12** of Chapter 3 for more information on air quality, noise and transportation impacts, respectively).

To accommodate site redevelopment under Alternatives 1 through 3, it is assumed that up to 24 existing buildings could be removed[2]. Structures assumed to be demolished would include all of the former GP buildings in Areas 2, 3 and 4. Refer to **Section 2.8.2** of Chapter 2 and **Section 3.11** of Chapter 3 for more information on site buildings and see **Figures 2-4 and 2-7** for maps of the buildings assumed to be removed.

After specific onsite areas are identified for redevelopment, existing buildings that would not be reused would be demolished. As specific areas are redeveloped, surrounding existing paved area could also be removed and/or planted with vegetation or hydroseeded until such time as these areas are redeveloped.

For the purposes of this Draft EIS, a preliminary grading concept was formulated. The concept assumes that the majority of the site would be raised approximately 3 to 6 feet above existing site grades; this concept would result in efficient access to parking facilities associated with buildings, site grades that would accommodate a gravity-flow stormwater system conveyance and discharge, mitigation against potential impacts to long-term sea-level rise, and reduction of potential intrusion into contaminated soils for utility trenching. Alternatives that would lessen grading quantities could be determined as part of the design and permit process for future construction projects.

Because site redevelopment would occur over an extended period of time, major utility systems would be integrated with phased redevelopment of the primary roadway network. These utilities include water, sewer, electrical/natural gas and stormwater systems to support redevelopment on the site. Temporary stormwater systems could be constructed and operated until the permanent systems are established (see Section 3.3, **Water Resources**, for more information).

Site preparation and construction of infrastructure and buildings would result in periodic impacts to adjacent land uses over the approximately 20-year redevelopment period. Construction-related impacts would include additional amounts of air pollution as a result of dust and emissions from construction equipment and vehicles; increased noise levels from construction activities; vibration associated with vehicle movement and construction activity; and, increased traffic associated with construction vehicles and construction workers. Although construction activities would occur incrementally over the approximately 20-year buildout period, such activity would move around the site and could result in temporary impacts to adjacent uses when site construction occurs near the boundary of the site or in closest proximity to those adjacent uses.

Because the site would be redeveloped incrementally over the approximately 20-year buildout period, certain new mixed uses, as well as any remaining existing uses on the New Whatcom site (including the BST, the PSE Encogen facility and potentially other uses in Area 1) would be in operation or occupied while construction on the site is occurring. Construction impacts in the vicinity of these new and existing uses on the New Whatcom site would also result in temporary impacts associated with noise, air pollution, vibration and traffic during the respective

[2] Actual decisions regarding reuse or removal of onsite buildings (those that remain after Georgia-Pacific demolition) would be made by the Port in the future in conjunction with site developers. The Port intends to explore potential opportunities for adaptive reuse of such existing buildings.

construction periods onsite (see Section 3.1, **Earth**, 3.2, **Air Quality,** 3.6, **Noise** and 3.12, **Transportation** for further details on construction impacts).

A list of land use permits and approvals that would be needed for construction, including for site preparation and infrastructure development is included in the **Fact Sheet** of this Draft EIS. Refer to **Chapter 2**, Description of Proposed Action and Alternatives, for further details on infrastructure development.

Displacement of Existing Uses

As part of the redevelopment of the site under Alternatives 1-3, it is assumed that some or all of the existing onsite uses could be displaced by 2016. GP operations are planned to be terminated at the end of 2007, prior to the initiation of redevelopment activities. Other industrial businesses, primarily located in Area 1, could remain onsite as part of the existing industrial space to be retained, or could be displaced and seek to relocate to other parts of the City or County. Ultimately, decisions related to displacement or retention of existing uses would be made by the Port, the City and/or individual businesses based on lease provisions and opportunities, economic/market factors and other considerations. As part of planned redevelopment, the Port has assumed that 450,000 square feet of light/marine industrial space would be available to existing or new tenants under Alternatives 1-3.

Transition in Land Use Patterns

In the broader context, redevelopment of the New Whatcom site would result in the creation of a new dense, urban mixed-use village in downtown Bellingham over the approximately 20-year buildout period. Redevelopment would represent conversion of a "brownfields area" and would be consistent with goals and policies of the Washington State Growth Management Act and the City of Bellingham Comprehensive Plan that call for urban infill development and that encourage sustainable development and seek to limit sprawl (refer to Section 3.8, **Relationship to Plans and Policies**, for detail).

Under the Redevelopment Alternatives, the site would be converted from an industrial site to a mixed-use neighborhood. The site could accommodate a range of uses, including certain industrial uses (marine and light industrial); however, approval of the Proposed Actions could be viewed as a reduction in the City's overall industrial land supply (refer to Section 3.8, **Relationship to Plans and Policies**, for more information on land supply issues). The City's Comprehensive Plan (2006) contemplates a transition to a Waterfront Mixed-Use designation for the site, upon approval of a Master Development Plan. As part of the Comprehensive Plan update, the City completed a commercial and industrial land supply analysis. The City concluded that 200 acres of developable industrial land will be needed to accommodate forecasted 20-year growth in the industrial sector, and that 374 acres of industrial land are available to meet the demand. Further, the City did not include the New Whatcom site as part of the available industrial land use, given the site's current designation (Industrial/Waterfront Mixed-Use) and the contemplated transition to a mixed use neighborhood. Therefore, it can be concluded that any real or perceived reduction in the industrial land supply as a result of the Proposed Action would not be considered a significant land use impact.

Infill redevelopment at the New Whatcom site would accommodate a diverse mix of uses, including substantial new housing opportunities and employment in a dense development

pattern. Dense infill development could alleviate pressure for growth in outlying areas or at the fringe of the Urban Growth Area (UGA). Growth in such areas may be less efficient relative to the provision of services and utilities. Redevelopment of the New Whatcom site would accommodate a portion of the employment and housing growth projected for the City of Bellingham; such infill redevelopment would consume less land than would lower density development and could be viewed as being more efficient from a land use perspective.

With proposed redevelopment, New Whatcom would become a hub of new activity in the community and could foster a range of public amenities, including:

- A range of recreational resources
- Gathering places and a new waterfront destination for area residents and visitors
- A place to work, learn, eat, recreate and live
- A range of new employment opportunities for the broader community
- A range of housing types, including affordable housing stock
- An extension campus of Western Washington University that allows a diverse setting for education and research.

The provision of a range of uses and urban densities could result in potential land use impacts typical of an urban environment, such as added traffic, noise and potential incompatibilities over the long-term. It is assumed that the Master Development Plan, Development Agreement and associated development regulations/design guidelines would seek to minimize these impacts to both onsite uses and surrounding uses in the area.

Under Alternatives 1 through 3, the remediated ASB would be converted to a marina. Marina Concept A would include up to 460 moorage slips, boat launch, and other associated facilities including parking and access areas, gatehouse with offices, shop and storage space, fuel and pumpout facilities and park, trail and habitat features (see **Section 2.6** of Chapter 2 for details on Marina Concept A). The addition of moorage slips and boat launch opportunities would increase activity levels within Area 1 and could foster connections between site areas north and south of the Whatcom Waterway. Park and trail features around the perimeter of the marina (along the bulkhead) would link to other park and trail elements of the redevelopment. Substantial public access opportunities to this portion of the site would be provided, as well as habitat enhancements. Construction and operation of the marina would result in additional air emissions, noise and traffic in the area; however, such impacts would not be expected to be significant (see Sections 3.2, **Air Quality**, 3.4, **Plants and Animals**, 3.6, **Noise** and 3.12, **Transportation** for more information on potential marina-related impacts).

Through the provision of public access, park and trail amenities and habitat enhancement, Marina Concept A would be considered to be complementary to overall New Whatcom mixed-use redevelopment. Additional opportunities for public access to the site's waterfront and overall increases in recreational uses would be consistent with Port and City goals for the establishment of a live-work-play environment at the site. Marina Concept A, together with other park and recreational features and the overall mix of uses under Alternatives 1 through 3, would contribute to the transformation of the land use character of the site from a historic industrial area to a diverse, urban environment with connections to surrounding neighborhoods including the CBD.

Marina Concept A would also be compatible with the marina, park and recreational land uses north of the site, associated with the Bellwether on the Bay development and the Squalicum

Marina. On an overall basis, marina uses would be compatible with other land uses in the site area and would serve to strengthen the waterfront as a recreational resource for the surrounding community.

Alternative 1

Alternative 1 assumes the highest density of potential redevelopment on the site, with approximately 7.5 million square feet of new building space at full build-out, including a mix of office, institutional, industrial, residential, retail and restaurant uses. Approximately 3,075 multifamily dwelling units would be constructed on the site by 2026. Development of new public parks, trails, habitat restoration areas and a marina complementing mixed-use redevelopment would also be provided.

The type, character and pattern of land uses on the site would change substantially from a mostly vacant industrial area, to an overall character reflecting a more urban density, featuring a broad range of uses, site amenities with public access and connections to the surrounding community. This change in land use character would be consistent with city goals for increased density in appropriate portions of the City, including the adjacent Old Town District Village and the CBD. **Table 3.7-3** shows the assumed land uses under Alternative 1 at 2016 and 2026, while **Table 3.7-4** shows the assumed building uses under Alternative 1 at 2016 and 2026.

2016

Conversion of Land Uses

Assumed redevelopment by 2016 would represent the initial transition of the New Whatcom site from a primarily vacant and underutilized industrial area to a new mixed use development that includes office, industrial, institutional, retail, restaurant and residential uses, along with public parks, trails, habitat restoration and waterfront access. By 2016, it is assumed that a total of approximately 3,368,500 square feet of new uses would be constructed on the New Whatcom site, compared to the approximately 1,155,000 square feet of building area currently on the site. In addition to the new uses constructed on the site, existing industrial uses would remain on the site by 2016 including the PSE Encogen Plant in Area 6, the BST in Area 9 and certain industrial businesses in Area 1. **Table 3.7-4** provides a breakdown of assumed building uses onsite by 2016.

Interspersed among mixed uses would be various public parks, trails and habitat restoration areas that would provide recreational opportunities, waterfront access and pedestrian and bicycle connections throughout the site and to surrounding neighborhoods including the CBD. The ASB would include the development of a new marina (Marina Concept A) and would also contain waterfront parks and trails surrounding the perimeter of the marina.

A majority of the shoreline area on site which is currently inaccessible to the public would be transformed into public parks, trails and habitat restoration area that would allow for public access to the waterfront area and provide additional recreation opportunities. These new shoreline features would not only provide a range of recreation and shoreline access opportunities for site residents and employees, but could also represent a recreational destination for the broader Bellingham area (see Section 3.13, **Public Services** for further

Table 3.7-3
ALTERNATIVE 1 – ASSUMED LAND USES IN 2016 & 2026 (ACRES)

Land Use	2016	2026
Building Footprint	24.7	45.6
Structured Parking Footprint	3.6	17.4
Surface Parking	18.0	15.9
Other Impervious Area	15.9	9.8
Street Right-of-Way	30.6	39.2
BNSF Railroad Corridor	3.7	3.7
Public Parks/Trails/Habitat Area	33.2	33.2
Vegetated Area	53.8	18.7
Marina Area	32.8	32.8
Total Acreage	216.3	216.3

Source: CollinsWoerman, 2007

Note: Other impervious area refers to setbacks, sidewalks, plazas, etc. Vegetated area refers to landscaped areas, outdoor public/private spaces, etc. In addition to the 216.3 acres identified above, the site also includes adjacent aquatic area.

Table 3.7-4
ALTERNATIVE 1 – ASSUMED BUILDING USES IN 2016 & 2026 (in Sq. Ft.)

Land Use	2016	2026
Office	691,000	2,345,000
Institutional	285,000	570,000
Light/Marine Industrial	310,000	450,000
Low-Rise Residential	184,000	184,000
Mid-Rise Residential	1,747,500	2,906,000
High-Rise Residential	0	600,000
Retail	108,500	355,000
Restaurant	42,500	90,000
Total Square Footage	3,368,500	7,500,000

Source: CollinsWoerman, 2007

details on parks and trails). New shoreline features would also include new habitat area and restoration of the natural shoreline, particularly along the south side of the Whatcom Waterway. All redevelopment within the shoreline area would be assumed to be consistent with applicable provisions of the City of Bellingham Shoreline Master Program (SMP). See Section 3.8, **Relationship to Plans and Policies**, for further details. The City is currently in the process of updating the SMP. A Shoreline Substantial Development Permit application was recently submitted by the Port to the City for the marina and associated facilities. The complete application will be subject to the existing SMP regulations; see **Section 2.6** of Chapter 2 and other New Whatcom redevelopment projects would likely be subject to the updated SMP regulations.

Newly developed and improved infrastructure would provide additional opportunities for vehicular access to the site. Access to the portion of the site north of the Whatcom Waterway (Area 1) would be provided from Hilton Street, F Street and C Street. Access to the portion of

the site south of the Whatcom Waterway (Areas 2-10) would be provided by improvements to Central Street, Cornwall Avenue (bridge) and Laurel Street (bridge). Maple Street (Area 1) and the Waterway Promenade (Areas 2 and 3) would provide additional vehicular connections within the site itself. Redevelopment under this alternative by 2016 also assumes the relocation of the BNSF railroad corridor to the southern boundary of the site, along the bluff. Relocation of this railway corridor would allow for additional connectivity to be provided within the main area of the site and would prevent the site from being disjointed or separated as under current conditions.

Relationship to Surrounding Uses

The relationship of the new onsite land uses with surrounding land uses is primarily a function of the intensity of new uses (such as type of site uses, density of the development, and levels of activity associated with the new development), intensity of the surrounding uses, proximity of new uses to surrounding uses, and existence of any buffers between new and surrounding uses.

Overall, the amount of building area on the New Whatcom site would increase from approximately 1.2 million building floor area square feet under existing conditions to approximately 3.4 million building floor area square feet under Alternative 1 by 2016.

Activity levels on the New Whatcom site would increase as a result of approximately 3,100 new employees and 1,600 new residential units on the site (residential units are assumed to be 1,200 gross square feet on average). Compared to the existing activity levels on the site (which are primarily associated with existing industrial uses in Area 1, PSE Encogen facility operations in Area 6 and BST operations in Area 9), the activity levels on the site would substantially increase due to the dense nature of redevelopment and increased site population. The general nature of new site activity would be more reflective of a site in transition from an industrial to a mixed use urban development. The provision of public parks and trails would also introduce recreational activity to the site. Although redevelopment would occur throughout the site, increased activity levels associated with redevelopment along the site perimeter would have the greatest potential to affect adjacent land uses.

In general, the New Whatcom site is bordered by Bellingham Bay on the west and is bordered by varied land uses to the north, east and south. Because the character of the surrounding land uses varies widely, the relationship of redevelopment to surrounding land uses under Alternative 1 is referenced by redevelopment area.

Area North and East of Redevelopment Area 1 – As described above, to the north of the site (CBD and Columbia Neighborhoods) are commercial, marina, marine industrial, institutional (coast guard and port offices) uses and surface parking lots. These uses would be separated from the New Whatcom site by the I&J Waterway, which is assumed to provide a natural, physical buffer between new uses on the site and uses to the north. Roeder Avenue and the bluff to the east also provide a buffer to the neighborhoods to the east. The uses to the north of the site would be most proximate to Area 1, which would include approximately 1.7 million square feet of office, light/marine industrial, mid-rise residential, retail and restaurant uses and a marina by 2016.

Redevelopment under Alternative 1 in this area would represent an increase in building height (up to a maximum of 100 feet), building density and activity levels when compared to existing conditions. The type of new onsite uses would be similar to the uses found in the adjacent area

to the north, which also contains a mix of uses, including multi-story commercial uses, a marina and other marine-related uses.

The trail assumed at the north end of Area 1 would increase pedestrian activity and would help to increase the connectivity of the site to adjacent areas to the north. Included under Alternative 1 is a pedestrian crossing from Area 1 to the western terminus of Broadway Avenue; this connection would also provide an additional pedestrian and bicycle connection to the site to/from the Lettered Streets and Columbia Neighborhoods to the northeast, across Roeder Avenue. Provision of this new connection would be anticipated to increase pedestrian activity in this off-site area. New park facilities and a new marina would also be located in or adjacent to Area 1. The new marina (Marina Concept A) would include up to 460 moorage slips and a parking area (up to 280 spaces). The addition of the new park and marina facilities would increase activity levels in this area by both onsite users and the greater community, while also providing new public access opportunities to the site's waterfront areas.

It is expected that with increased building densities and new park and recreation features, activity levels would increase in this area of the site. Considering the buffer provided by the I&J Waterway, along with the similarities between on and offsite uses, significant land use impacts to the area to the north and northeast would not be anticipated.

The area to the east of Area 1 (Lettered Streets Neighborhood), across Roeder Avenue, includes commercial, industrial, multifamily and single-family uses. These uses are physically separated from the New Whatcom site by topographic grade changes, the BNSF railway corridor and Roeder Avenue. As described above, redevelopment of Alternative 1 would increase building height, building density and activity levels when compared to existing conditions. Although the uses and intensity on the site would change, new mixed uses would generally be consistent with the existing commercial, industrial and multifamily uses that are most proximate to the site. Single-family residential uses in this area are located on top of the bluff further to the east and would not be expected to be directly impacted. As described above under **Affected Environment**, the area to the east is considered to be an area in potential transition as it is designated as the Old Town District Village (a Tier 2 Urban Village in the Comprehensive Plan) and is anticipated to accommodate additional density and growth over the next 20 years (see Section 3.8, **Relationship to Plans and Polices** for further information on urban villages).

Street improvements in Area 1 (Hilton Street, F Street and C Street) would provide added vehicular connections opportunities for the neighboring areas to the east. In addition, new trails, including the Broadway Overpass, would provide new pedestrian and bicycle connection opportunities for the adjacent Lettered Streets neighborhood to the east. Overall, increased building densities and activity levels would be expected with redevelopment in Area 1. However, based on the physical buffer provided by the railway corridor and Roeder Avenue, the topographic difference between the site and area to the east, and the general compatibility of assumed new uses with existing uses to the east (as well as the potential transitional nature of that area in the future), significant land use impacts to the area east of Area 1 would not be anticipated.

Central Business District (area east of Redevelopment Areas 2 and 5) – The Central Business District (CBD) area to the east of Areas 2 through 5, is comprised of a variety of urban uses including: commercial, office, retail, government and multifamily residential. Redevelopment in Areas 2 through 5 would include a mix of office, low-rise and mid-rise residential, retail,

restaurant and institutional uses (potentially including new research and educational facilities associated with Western Washington University). Redevelopment in Areas 2 through 5 would represent a substantial increase in building density and activity levels when compared to the existing mostly vacant conditions; new employee and residential populations would also represent a substantial increase over existing conditions. Although the building density and activity levels on the site would increase, the overall mixed use character would be consistent with the land use character and activity levels of the adjacent CBD. The maximum building height (200 feet) would be greater than existing buildings immediately adjacent to the site, but would be generally comparable to other buildings and new buildings planned within the CBD (Refer to Section 3.10, **Aesthetics/Light and Glare**, for more discussion of building height and scale).

Redevelopment in Areas 2 through 5 would also add new connections between the New Whatcom site and the surrounding community, including the CBD. Vehicular connections at Central Street, Bay Street and Cornwall Avenue, along with trail connections for pedestrians and bicyclists along the Whatcom Waterway, would allow for increased public access to the site and waterfront uses. Trail connections provided at the south end of the Whatcom Waterway would not only connect with the site (Areas 2, 3, 4 and 8), but would also provide a pedestrian and bicycle connection with the Maritime Heritage Park in Downtown and the Whatcom Creek Trail beyond; these new pedestrian/bicycle connections could result in more use of existing offsite trails (refer to Section 3.13, **Public Services**, for further discussion on increased use of the existing trail system). These new vehicular and pedestrian/bicycle connections to the CBD would promote an extension of the CBD to the site and waterfront. This would also result in increased levels of traffic, noise, air pollution and general activity in the downtown area (see Section 3.2, **Air Quality**, Section 3.6, **Noise**, and Section 3.12, **Transportation**, for further details on potential additional activity level impacts including air quality, noise and traffic impacts).

The pattern of increased activity in the downtown area resulting from redevelopment of the New Whatcom site would be reflective of new uses on the site, with commercial/office and institutional uses generally increasing activity levels during weekdays and residents generally increasing activity levels in the downtown area during evening hours and weekends. New public parks, trails and the marina would also be destination features, generating visitor populations to the site. Such visitors would also likely result in increased patronage of CBD businesses (including retail and restaurant establishments) and added use of governmental and civic functions in the CBD. This visitor population would be anticipated to be highest on weekends and in summer months. Given the general similarity of assumed land uses with those in the downtown area, the increased activity associated with assumed new uses would not be anticipated to result in significant land use impacts to the CBD.

Increases in activity levels associated with new uses on the site could potentially benefit the CBD. For example, increases in the number of residents, employees and visitors could have a spillover effect to downtown, resulting in added support for existing businesses and potentially creating demand for certain types of businesses either not currently provided in the area, and/or businesses that would support and be complimentary to those on the New Whatcom site. On the other hand, it is possible that businesses in the CBD that would compete directly with new uses on the site would not benefit on an overall basis. Ultimately, this would depend on the specific mix of businesses that choose to locate at New Whatcom, relative to the type present in the CBD and surrounding area, and other economic and market factors.

New park and habitat restoration areas along the south edge of the Whatcom Waterway would also be provided by 2016. These new amenities would provide public recreation and waterfront access opportunities for onsite residents as well as for the surrounding neighborhoods. New trails would allow for additional pedestrian access to the site by providing a connection between the New Whatcom site and the Maritime Heritage Park and Whatcom Creek Trail. Restoration work would also help to restore this waterfront area to a natural shoreline. The addition of these new recreation features would also increase the activity levels on the site. Overall, redevelopment would result in increased building densities and onsite activity levels; site redevelopment would also result in an expansion of the CBD to the waterfront. Significant adverse land use impacts would not be anticipated.

Area South of Redevelopment Area 7 – The area to the south of the site (Sehome Neighborhood), south of Area 7, is comprised primarily of low-level commercial, multifamily and single-family residential uses. Redevelopment on the New Whatcom site that would be most proximate to this area would be located in Areas 6 through 9. Redevelopment would include a mix of office, light/marine industrial, residential, retail and restaurant; no new redevelopment is assumed to occur in Area 6 at this time because the PSE Encogen facility is assumed to remain in place through 2016. Redevelopment in these areas would represent an increase in building density and activity levels on the site. Building heights in these areas of the site would be a maximum of 100 feet which would be generally similar to the heights of the taller multifamily residential buildings to the south of Area 7; the elevation difference provided by the bluff between Area 7 of the site and the area to the south would further limit the potential for significant land use impacts to this area (refer to Section 3.10, **Aesthetics/Light and Glare**, for illustrations of potential building redevelopment as viewed from areas south of the site).

The development of new onsite street infrastructure, particularly the Laurel Street Bridge through Area 7, would provide new street connections to areas to the south, thus making the site more accessible for the community. Additional traffic on the street network and bridge connections would increase the potential for noise and air pollution impacts to adjacent uses (see Section 3.2, **Air Quality**, Section 3.6, **Noise**, and Section 3.12, **Transportation**, for further details on potential additional activity level impacts including air quality, noise and traffic impacts).

Area South of Redevelopment Area 10 – The area to the south of Area 10 (South Hill Neighborhood) is comprised primarily of multifamily and single-family residential uses. Redevelopment that would be most proximate to this area would be located in Areas 9 and 10. Redevelopment in these areas would include a mix of office, light/marine industrial, residential, retail and restaurant uses. Redevelopment in these areas would represent an increase in building density and activity levels on the site. Building heights in these areas would be a maximum of 100 feet, which would be greater than the heights of the multifamily residential uses to the south. However, given the approximately 70 to 100-foot elevation difference and buffer provided by the intervening bluff, significant impacts to the area south of Area 10 would not be anticipated (refer to Section 3.10, **Aesthetics/Light and Glare**, for illustrations of potential building redevelopment as viewed from the area south of the site).

New parks, trails and habitat restoration areas located in Areas 9 and 10 would provide new public recreation opportunities and waterfront access and activities for onsite residents as well as for the adjacent neighborhoods. Trails provided in Areas 9 and 10, in combination with the over-water trail to Boulevard Park (identified in this Draft EIS as a Separate Action/Background Project; see **Section 2.9** of Chapter 2) and other New Whatcom trails, would complete a

trail/park corridor that would link Maritime Heritage Park and the Whatcom Creek Trail with the South Bay Trail, and potentially Boulevard Park (refer to the **Indirect/Cumulative Impacts** discussion below for information on the over-water trail to Boulevard Park). The additional trails would also provide new opportunities for pedestrian and bicycle access to the site; onsite trails would also connect with the "high-speed bicycle trail" planned by the City along the base of the bluff along the perimeter of the site. Overall redevelopment in this area of the site would result in increased building density, activity levels and access opportunities on the site; however, based on the similar mix of uses to be provided on the site and the existing uses in the area, and the vegetative and physical buffer provided by the bluff between the area to the south and the New Whatcom site, significant land use impacts would not be anticipated (see Section 3.2, **Air Quality**, Section 3.6, **Noise**, and Section 3.12, **Transportation**, for further details on potential additional activity level impacts including air quality, noise and traffic impacts).

Redevelopment under Alternative 1 would also assume the relocation of the BNSF railroad corridor along the edge of the New Whatcom site (adjacent to Areas 1, 2, 5, 7 and 10). Relocation of the railroad could potentially increase noise, air (emissions) and vibration impacts to surrounding uses in close proximity to the new railroad location. However, such conditions would be similar to conditions currently resulting from railroad use in other parts of the City and region, and would not necessarily be considered an incompatible use. Therefore, no significant land use impacts would be expected with relocation of the railroad. The bluff to the south of Area 7 would provide a buffer between the relocated railroad corridor and the uses to the south, further minimizing the potential for impacts. (Relocation of the railroad corridor would be subject to applicable permits and could require additional environmental review in the future.)

Shoreline Use – The redevelopment concept for the site assumes the dedication of the majority of the site's waterfront to public access, including area in parks, open space and trails. Redevelopment of the area within the shoreline (200 feet from the OHWM) under Alternative 1 assumes the greatest amount of parks and open space of the Redevelopment Alternatives, and therefore, assumes the least amount of building development opportunity within the shoreline jurisdiction. However, some building development would occur in the shoreline area.

Under Alternative 1, the majority of the shoreline within Areas 2, 3, 4, 8 and 10 would be in park, trail and open space area. Where narrow width or no trail/open space would be provided along the shoreline area in Areas 1 and 9, the opportunity for building redevelopment within the shoreline area would be provided.

Consistent with the City of Bellingham draft Shoreline Master Program (staff recommendations), building development within the shoreline area within Areas 1 and 9 could be located adjacent to the OHWM for water-dependent uses and could be located to within 50 feet of the OHWM for non-water-dependent uses. It should be noted that the SMP is currently being updated by the City; staff-recommended setbacks likely represent the minimum setbacks that will be adopted. Therefore, the land use analysis herein likely represents a "worst-case" evaluation (refer to Section 3.8, **Relationship to Plans and Policies** for further discussion of the SMP update). All buildings within the shoreline jurisdiction would be allowed an outright maximum height of 35 feet, and could be granted a maximum height up to 50 feet depending upon the results of a required view analysis depicting potential impacts to surrounding properties.

Uses within the shoreline would primarily be located internal to the site (that is, shoreline areas are not adjacent to external, offsite uses) and would be consistent with other mixed uses on the site. Shoreline uses along the southern edge of the I&J Waterway in the northern portion of

Area 1 would be located in proximity to offsite uses to the north. As indicated earlier, considering the buffer provided by the intervening I&J Waterway, along with the similarities between onsite and offsite uses, significant shoreline impacts to the area to the north from uses in Area 1 would not be anticipated. Overall, redevelopment under Alternative 1 would result in substantial opportunities for public access to and enjoyment of the waterfront; assumed uses would be compatible with the shoreline environment and would not result in significant land use impacts onsite or to offsite uses (refer to Section 3.8, **Relationship to Plans and Policies**, for more discussion of the SMP).

Relationship to Existing Onsite Uses

Existing GP operations are scheduled to be terminated at the end of 2007. As indicated above, existing onsite uses could potentially be displaced from the site as part of future redevelopment. It is also possible that existing businesses may remain on the site in reused or new industrial space.

It is assumed that the PSE Encogen facility in Area 6, BST operations in Area 9, certain industrial uses in Area 1 and railroad operations in Areas 1, 2, 5, 7 and 10 would continue through 2016. For the existing industrial uses in Area 1, BST operations in Area 9 and the PSE Encogen facility in Area 6, construction activity associated with mixed use redevelopment (including construction of roadways, parks and buildings) could introduce new sources of dust and equipment emissions, and truck traffic that could affect operations on a temporary basis.

Redevelopment under Alternative 1 could locate new uses in proximity to existing and future industrial and marine-related uses in Area 1, the PSE Encogen facility in Area 6 and BST operations and marine-related and shipping uses in Area 9. A mix of office, residential, retail and restaurant uses are assumed for these areas. These new uses could experience impacts related to noise, emissions and vibrations as result of their proximity to these ongoing industrial uses; however these impacts are not anticipated to be significant. During occupancy, new uses in proximity to these ongoing operations could increase the potential for nuisance complaints from new site employees and residents regarding these operations. Design standards and development regulations adopted along with the Master Development Plan could be established to ensure that new uses would be compatible with existing onsite uses.

New office, industrial, residential, retail and restaurant uses assumed in Areas 1, 2, 5, 7 and 10 could be located adjacent to the relocated railroad corridor. These uses could experience noise, emissions and vibration impacts from railroad operations; however, proximity of these uses would be similar to existing land use conditions in other areas adjacent to the railroad corridor in Bellingham and throughout the region, and would not necessarily be considered an incompatible use. As a result, significant impacts would not be anticipated (see Section 3.1, **Earth**, Section 3.2, **Air Quality**, and Section 3.6, **Noise**, for further details on impacts and mitigation from the railroad operations). Again, future relocation of the railroad corridor would be subject to applicable permits and could require additional environmental review.

Extensions of the existing roadway system to the site and development of new onsite roads would result in increased activity and noise levels in proximity to these roads. Noise and activity levels associated with these roadways would be typical of conditions in a busy urban environment, and significant impacts as a result of traffic, noise and air quality would not be anticipated.

2026

Conversion of Land Uses

The 2026 condition reflects the conclusion of the transition of the site over time to a mixed use urban village. By 2026, it is assumed that the New Whatcom site will have fully transitioned from its historically industrial uses to a new 7.5 million square foot mixed use development. A variety of mixed uses would be dispersed throughout each area on the site, including Area 6 where it is assumed that the existing PSE Encogen Plant would cease operations and be redeveloped to accommodate mixed-uses by 2026. See **Table 3.7-4** for a list of assumed uses and square footages under Alternative 1 in 2026.

Full build-out of the site would include the same amount of public parks, trails and habitat restoration areas as described for the 2016 condition. These new areas would provide recreation and gathering areas for onsite residents and employees as well as for the broader community, along with new opportunities for public access to the waterfront (see Section 3.13, **Public Services** for further details on parks and trails).

In addition to the infrastructure and site access constructed by 2016, additional new streets would be constructed between 2016 and 2026 to provide increased access to the site from the surrounding community and between the individual areas on the site. These new streets would include: Chestnut Street, Maple Street, Commercial Street, Oak Street, Log Pond Drive, and Wharf Street (See **Section 2.8.2** of Chapter 2 and Section 3.12, **Transportation**, for further details on new streets).

Relationship to Surrounding Uses

At full build-out, the amount of building area on the New Whatcom site would increase from approximately 1.2 million building floor area square feet under existing conditions to approximately 7.5 million building floor area square feet by 2026, representing completion of site transformation from a mostly vacant and underutilized industrial area to a mixed use urban village. Although the overall density of development and level of activity on the site would be greater in 2026 than in 2016, the general character of land use conditions and the relationship to surrounding uses would be similar.

Activity levels on the site would continue to increase as a result of approximately 8,700 new employees and 3,000 new residential units, compared to 3,100 new employees and 1,600 new residential units on the site in 2016. Compared to the existing activity levels (which are primarily associated with existing industrial uses in Areas 1, 2, 6 and 9), the activity levels on the site would substantially increase. The general nature of the new site activity would be consistent with a dense urban mixed-use development, as opposed to the current, primarily vacant and underutilized industrial use. As under 2016 conditions, increased activity associated with redevelopment along the site perimeter would have the greatest potential to impact adjacent land uses.

Area North and East of Redevelopment Area 1 - The area to the north of the site (CBD and Columbia Neighborhoods) would be adjacent to Area 1, but is physically separated from Area 1 by the intervening I&J Waterway. By 2026, Area 1 would include approximately 2.1 million square feet of mixed uses. Redevelopment at full build-out would represent a substantial increase over existing conditions in Area 1 and would result in an increased site population and

activity levels compared to 2016 conditions. Proposed building heights in Area 1 would be a maximum of 100 feet, which would be taller than the existing buildings located to the north. Activity levels in Area 1 would be greater than those experienced to the north of the site due to the increased number of employees and residents expected in Area 1.

Trail and roadway improvements in this area by 2026 would be the same as those described under the 2016 condition. Activity levels and traffic in Area 1 would likely increase due to the larger site population and more people traveling to and from the site.

As described under **Affected Environment**, the area to the east of Area 1 (Lettered Streets Neighborhood), across Roeder Avenue, contains primarily commercial, industrial and multifamily residential uses. New development in Area 1 at full build-out would represent an increase in building density, population, activity levels and building heights when compared to the existing and 2016 conditions. New uses in Area 1 would be similar to the range of uses in the surrounding area to the east; however, the intensity of these uses would be greater on the New Whatcom site.

Trail and roadway improvements by 2026 would be the same as those described under the 2016 condition. Activity levels and traffic could increase due to the larger site population in 2026; the parks, trails and marina would serve as a destination point for the community as well. At full build-out, activity levels, population and building density would increase in Area 1 compared to 2016 conditions; however, significant land use impacts in this area would not be anticipated due to the similarity between existing offsite uses and assumed uses on the site, the potential future transition of the area to a greater density, and the physical separation provided between these uses by the BNSF railroad corridor and elevation difference (see Section 3.2, **Air Quality**, Section 3.6 **Noise**, and Section 3.12, **Transportation**, for further details on potential additional activity level impacts including air quality, noise and traffic impacts).

Central Business District (area east of Redevelopment Areas 2 and 5) – The CBD is located to the east of Areas 2 through 5. At full build-out, Area 2 through Area 5 would contain a similar mix of uses to those described under the 2016 condition, but at a greater density. These assumed uses would be similar to the types of uses currently found in the adjacent CBD; however the assumed density and intensity of the redevelopment would likely be greater. Building heights for these areas of New Whatcom would be a maximum of 150 to 200 feet, which would be higher than the majority of the existing buildings in the CBD but similar to the taller buildings in the CBD and several residential towers that are proposed in this area (see **Affected Environment** above). Future development in the CBD through the year 2026 could result in taller buildings and greater densities than currently exist, thereby increasing activity levels and the urban character of the CBD.

As under 2016 conditions, the continued increases in activity levels associated with new uses on the site could potentially benefit the CBD. Increases in the number of residents, employees and visitors could have a spillover effect to downtown, resulting in support for existing businesses and potentially creating demand for certain types of businesses either not provided in the area, and/or for businesses that would support and be complementary to those on the New Whatcom site. However, it is also possible that businesses in the CBD that would compete directly with new businesses on the site would not benefit on an overall basis. Overall, the land use character of the CBD will likely transition over time to a more dense urban center, with or without New Whatcom redevelopment. To the extent that New Whatcom becomes an extension

of the CBD over time, the land use transition of both areas would likely be complementary and holistic. Significant land use impacts to the CBD from redevelopment would not be expected.

Parks and trails provided in these redevelopment areas would be the same as those described under the 2016 conditions; however, activity levels in this area of the site would increase due to an increased number of employees and residents. Street infrastructure improvements at Commercial Street, Maple Street and Log Pond Drive would be constructed by 2026 and would provide additional vehicular access connections to the site from the CBD and other surrounding neighborhoods, which could also increase activity levels in these offsite areas. Building density and activity levels would increase in this area of the site at full buildout compared to 2016 conditions; however, due to the similar mix of uses assumed onsite and those located adjacent to the site, significant land use impacts would not be anticipated for the CBD area.

Area South of Redevelopment Areas 7 and 10 – By 2026, redevelopment in the southern portion of the site (Areas 6 through 10) would include a similar mix of uses to those provided by 2016, but at greater densities. Maximum building height in this area would be 100 feet which would be similar to the taller multifamily residential structures located to the south of Area 7 (Sehome Neighborhood), and taller than the multifamily buildings to the south of Area 10 (South Hill Neighborhood). Industrial uses in Area 9 associated with the BST would be generally located at the north end of Area 9, away from adjacent surrounding uses. Although building density and activity levels would increase under full build-out of Alternative 1, the general mixed use character would be consistent with the current area to the south of the site. The approximately 70 to 100-foot elevation difference and buffer provided by the intervening bluff south of Area 7 and south of Area 10, would provide additional separation between new onsite uses and uses to the south, further minimizing the potential for significant land use impacts.

Parks and trails provided in this area of the site (Areas 6 through 10) would be the same as those described under 2016 conditions; however, activity levels onsite would increase due to the increased onsite population. Recreation areas would also attract users from the surrounding community and would become a destination area.

Increased access to the site would be provided under this Alternative by 2026 via Wharf Street, which would provide new connections to the site from neighborhoods to the south. In addition, Commercial Street, Oak Street and Log Pond Drive would also be developed in this area of the site. Increased trail access in the south area of the site, as described for the 2016 condition, would also provide new connections to the site via the South Bay Trail and Boulevard Park (refer to the **Indirect/Cumulative Impacts** discussion below for information on the over-water trail to Boulevard Park). Redevelopment of the New Whatcom site would result in increased building density and activity levels in these areas of the site; however, because of the similar type of uses assumed on the site and the types of existing uses to the south, and the physical separation provided by the vegetated bluff area immediately south of Areas 7 and 10, it is anticipated that significant adverse land use impacts to the area to the south would not occur.

Shoreline Use – Park and trail features within the shoreline jurisdiction area of Areas 2, 3, 4, 8 and 10 are assumed to be provided by 2016, with no additional public park/trail features within the shoreline jurisdiction area assumed for 2026. Redevelopment within the shoreline jurisdiction area of Areas 1 and 9 would be similar to the type of uses and building heights described for the 2016 condition, and would be assumed to be consistent with the City of Bellingham Shoreline Master Program applicable regulations. However, the overall amount of redevelopment within the shoreline jurisdiction area would likely be greater than in 2016. As

described for the 2016 condition, the majority of the redevelopment in the shoreline area would be located internal to the site and would be consistent with other New Whatcom mixed uses. Shoreline redevelopment along the southern edge of the I&J Waterway (Area 1) would not be anticipated to result in significant land use impacts to the area to the north, considering the similarity of assumed uses on the site with existing uses to the north and the intervening I&J Waterway.

Relationship to Existing Onsite Uses

It is assumed that certain industrial uses in Area 1, the BST in Area 9 and railroad operations adjacent to Areas 1, 2, 5, 7 and 10 would continue through 2026. As described under the 2016 condition, these uses could experience impacts associated with construction activities (dust, emissions, noise and truck traffic). A similar mix of uses could be located in proximity to these existing operations; however, as described for the 2016 condition, significant land use impacts would not be anticipated. As described for the 2016 condition, new uses in proximity to ongoing operations could result in nuisance complaints from onsite employees and residents regarding operations; to the extent that additional populations are located in proximity to ongoing operations, the potential for nuisance complaints would increase compared to the 2016 condition. Design guidelines and regulations adopted as part of the Master Development Plan and Development Agreement process could be established to ensure that new uses are compatible with existing onsite uses.

By 2026, it is assumed that the PSE Encogen facility would relocate and/or abandon its operations in Area 6. As a result, this area would be redeveloped and potential land use impacts associated with the PSE Encogen facility discussed under the 2016 condition would not occur in 2026.

As described earlier, extensions to existing roads and new onsite site roads would increase activity and noise levels; however, these levels would be typical of a busy urban environment and significant land use impacts would not be anticipated.

Alternatives 2, 2A and 3

Alternatives 2, 2A and 3 assume redevelopment of the New Whatcom site with a similar mix of uses to those described under Alternative 1; however, building densities and building heights would all be lower under Alternatives 2, 2A and 3. In addition, roadway improvements, parks, trails and open space would all be provided at lower levels when compared to Alternative 1. As a result, land use impacts from Alternatives 2, 2A and 3 would be similar in nature to those described under Alternative 1, but at a lower intensity.

Alternative 2 assumes the medium range of redevelopment on the site, with approximately 6 million square feet of new building space at full buildout in 2026 (compared to 7.5 million square feet under Alternative 1). This alternative assumes approximately 2.80 million square feet of employment-generating uses, 375,000 square feet of retail uses and 2.82 million square feet of residential redevelopment. Approximately 2,350 multifamily dwelling units would be constructed on the site (compared to 3,075 under Alternative 1). Development of new public parks, trails, habitat restoration areas and a marina complementary to mixed use redevelopment would also be provided; however, the amount of parks, trails and habitat would be lower than under Alternative 1. **Table 3.7-5** illustrates the assumed land uses under Alternative 2 at 2016 and

2026, while **Table 3.7.6** shows the assumed building uses under Alternative 2 at 2016 and 2026.

Table 3.7-5
ALTERNATIVE 2 – ASSUMED LAND USES IN 2016 & 2026 (ACRES)

Land Use	2016	2026
Building Footprint	26.1	45.8
Structured Parking Footprint	2.5	11.9
Surface Parking	17.4	23.7
Other Impervious Area	15.9	10.9
Street Right-of-Way	26.3	34.8
BNSF Railroad Corridor	3.7	3.7
Public Parks/Trails/Habitat Area	23.8	23.8
Vegetated Area	67.8	32.8
Marina Area	32.8	32.8
Total Acreage	216.3	216.3

Source: CollinsWoerman, 2007

Note: Other impervious area refers to setbacks, sidewalks, plazas, etc. Vegetated area refers to landscaped areas, outdoor public/private spaces, etc. In addition to the 216.3 acres identified above, the site also includes adjacent aquatic area.

Table 3.7-6
ALTERNATIVE 2 – ASSUMED BUILDING USES IN 2016 & 2026 (in Sq. Ft.)

Land Use	2016	2026
Office	488,500	1,785,000
Institutional	285,000	570,000
Light/Marine Industrial	310,000	450,000
Low-Rise Residential	585,600	600,000
Mid-Rise Residential	895,000	1,670,000
High-Rise Residential	0	550,000
Retail	86,000	310,000
Restaurant	39,500	65,000
Total Square Footage	2,689,600	6,000,000

Source: CollinsWoerman, 2007

Alternative 2A is a sub-alternative to Alternative 2 and differs in that the relocation of the railroad would occur by 2026 as opposed to 2016 under Alternative 2. In addition, infrastructure improvements would be slightly different between the two Alternatives, as well as the timing of said improvements. Alternative 2A assumes the same mix of employment and residential land uses, parks, trails and habitat restoration area as Alternative 2. **Table 3.7-7** provides a breakdown of assumed site land uses under Alternative 2A.

Alternative 3 assumes the lower range of potential redevelopment on the site, with approximately 4 million total square feet of building space at full buildout in 2026 (compared to 7.5 million square feet under Alternative 1). Approximately 2.15 million square feet of employment generating uses, 260,000 square feet of retail uses and 1.59 million square feet of residential uses are assumed under Alternative 3; approximately 1,325 total residential units

would be constructed at full build-out (compared to 3,075 under Alternative 1). Public parks, trails, habitat restoration areas and a marina would also be provided; however the amount of parks, trails and habitat would be lower than under Alternative 1 and 2. **Table 3.7-8** illustrates the assumed land uses under Alternative 3 while **Table 3.7-9** illustrates the assumed building uses for the site.

Table 3.7-7
ALTERNATIVE 2A – ASSUMED LAND USES IN 2016 & 2026 (ACRES)

Land Use	2016	2026
Building Footprint	26.1	45.8
Structured Parking Footprint	2.5	11.9
Surface Parking	17.4	23.7
Other Impervious Area	15.9	10.9
Street Right-of-Way	28.9	39.0
BNSF Railroad Corridor	6.9	2.5
Public Parks/Trails/Habitat Area	23.8	23.8
Vegetated Area	62.0	28.5
Marina Area	32.8	32.8
Total Acreage	216.3	216.3

Source: CollinsWoerman, 2007

Note: Other impervious area refers to setbacks, sidewalks, plazas, etc. Vegetated area refers to landscaped areas, outdoor public/private spaces, etc. In addition to the 216.3 acres identified above, the site also includes adjacent aquatic area.

Table 3.7-8
ALTERNATIVE 3 – ASSUMED LAND USES IN 2016 & 2026 (ACRES)

Land Use	2016	2026
Building Footprint	19.5	41.2
Structured Parking Footprint	0.0	8.9
Surface Parking	29.7	32.8
Other Impervious Area	15.9	10.2
Street Right-of-Way	24.3	34.8
BNSF Railroad Corridor	6.9	6.9
Public Parks/Trails/Habitat Area	15.0	15.0
Vegetated Area	72.2	33.7
Marina Area	32.8	32.8
Total Acreage	216.3	216.3

Source: CollinsWoerman, 2007

Note: Other impervious area refers to setbacks, sidewalks, plazas, etc. Vegetated area refers to landscaped areas, outdoor public/private spaces, etc. In addition to the 216.3 acres identified above, the site also includes adjacent aquatic area.

Table 3.7-9
ALTERNATIVE 3 – ASSUMED BUILDING USES 2016 & 2026 (in Sq. Ft.)

Land Use	2016	2026
Office	263,000	1,130,000
Institutional	285,000	570,000
Light/Marine Industrial	310,000	450,000
Low-Rise Residential	714,000	1,280,000
Mid-Rise Residential	75,000	310,000
High-Rise Residential	0	0
Retail	62,400	214,500
Restaurant	17,850	45,500
Total Square Footage	1,727,250	4,000,000

Source: CollinsWoerman, 2007

2016

Conversion of Land Uses

Redevelopment under Alternative 2 would result in the initial transition of the New Whatcom site from a primarily vacant and underutilized industrial area to a new mixed use development with a similar mix of uses to Alternative 1; however, redevelopment under Alternative 2 would include a less dense mix of uses. By 2016, it is assumed that a total of approximately 2.7 million square feet of new uses (compared with 3.4 million square feet under Alternative 1) would be constructed on the New Whatcom site. **Table 3.7-6** provides a breakdown of assumed building uses onsite by 2016. The amount of public parks, trails and habitat restoration areas provided under Alternative 2 would also be less than those described under Alternative 1; it is assumed that the park along the east end of the I&J Waterway, the park along the southern edge of the Whatcom Waterway and the pedestrian overpass to Broadway Avenue would not be provided (see Section 3.13, **Public Services** and **Chapter 2** for further detail on parks and trails). Roadway improvements under Alternative 2 would be similar to those under Alternative 1; however, Cornwall Avenue would be closed between Laurel Street and Oak Street and the Cornwall Avenue Bridge would be closed upon the relocation of the railroad corridor, thus providing fewer vehicular connections between the site and the CBD than under Alternative 1.

Alternative 2A assumes the same mix and amount of land uses, parks, trails and habitat areas as described for Alternative 2 (see **Table 3.7-7** of a breakdown of proposed land uses). Street improvements would be similar to Alternative 1; however, the Cornwall Bridge and Laurel Street Bridge would not be constructed by 2016. In addition, the BNSF railroad corridor is assumed to remain in its current location and would continue to separate portions of the site.

Redevelopment assumed under Alternative 3 would include a similar mix of uses but at lower densities than those assumed for under Alternative 1 in 2016 (approximately 1.7 million square feet compared with 3.4 million in Alternative 1). **Table 3.7-9** provides a breakdown of assumed building uses onsite by 2016. A similar mix of park, trail, habitat restoration and marina amenities would be provided under Alternative 3 as under Alternative 1. However, it is assumed that several park/trail amenities would not be included such as: the park at the east end of the I&J Waterway; the park along the southern edge of the Whatcom Waterway; the park along the shoreline in Area 10, the pedestrian overpass to Broadway Avenue and the pedestrian bridge

over the Whatcom Waterway (see Section 3.13, **Public Services**, for further details on parks and trails). Roadway improvements would be less under Alternative 3 than assumed under Alternative 1; the Waterway Promenade, Central Avenue, Maple Street, W Chestnut Street, Bay Street and the Laurel Street Bridge would not be constructed by 2016. In addition, the BNSF railroad corridor would remain in its existing alignment.

Relationship to Surrounding Uses

Redevelopment assumed by 2016 under Alternative 2 includes a similar mix of uses to those described under Alternative 1, but at lower density levels. Activity levels on the site under Alternative 2 would be somewhat lower than under Alternative 1 as a result of approximately 2,600 new employees and 1,200 new residential units (compared with 3,100 new employees and 1,600 new residential units). Maximum building heights assumed for Alternative 2 would also be lower; 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 with 150 feet under Alternative 1), and 75 feet in Areas 4 and 6-10 (compared with 100 feet under Alternative 1). In general, the relationship of building heights on the site to those in the surrounding area would be similar to that described for Alternative 1. However, the difference in building heights between onsite buildings and those existing in certain offsite areas would be less under Alternative 2 than Alternative 1. For example, potential differences in building heights between those assumed in Areas 9 and 10 and the offsite area to the south of Area 10 atop the bluff, would not occur to the extent under Alternative 1. As under Alternative 1, significant land use impacts to adjacent uses as a result of increased density and building heights would not be anticipated under Alternative 2.

The relationship of new uses on the site with existing ongoing uses (BST, industrial uses in Area 1, PSE Encogen facility and railroad corridor) would be similar to that under Alternative 1, although the density of new uses in proximity to ongoing uses could be less.

Alternative 2 would also include fewer public amenities such as public parks, trails, open space and roads. Alternative 2 would assume 24 acres of parks, trails and habitat restoration on the site (compared to 33 acres under Alternative 1). The lower amount of park amenities assumed under Alternative 2 would likely result in slightly lower activity levels on the site when compared to Alternative 1. Public streets provided under Alternative 2 would be similar to Alternative 1; however the Cornwall Avenue Bridge would not be included, thus limiting the amount of access and reducing the connections to the downtown CBD.

In general, activity levels on the site in 2016 under Alternative 2 would be similar in nature but less in degree than under Alternative 1. Overall land use impacts to surrounding uses as a result of added vehicle traffic, pedestrian volumes and noise would be less than under Alternative 1 (see Section 3.2, **Air Quality**, Section 3.6 **Noise**, and Section 3.12, **Transportation**, for further details on potential additional activity level impacts including air quality, noise and traffic impacts). Although there would be fewer roadway connections between the site and the CBD and a lower site population than under Alternative 1, redevelopment under Alternative 2 would also increase the number of visitors to the CBD, although at a lower level than under Alternative 1. As described for Alternative 1, increases in activity levels associated with new uses on the site could potentially benefit the CBD, although the potential for benefit would ultimately depend on the specific mix of businesses that choose to locate at New Whatcom relative to the type present in the CBD.

Under Alternative 2A, redevelopment assumed by 2016 would feature the same mix and density of building redevelopment along with the same amount of residential units and employees, parks, trails and habitat restoration areas as described under Alternative 2 (see **Table 3.7-7** for a breakdown of assumed land uses on the site). Public street improvements assumed under Alternative 2A would be similar to those under Alternative 2; however Cornwall Avenue would remain open and the Laurel Street Bridge would not be constructed by 2016; thus, land use impacts associated with construction and operation of the Laurel Street Bridge would not occur by 2016. The BNSF railroad corridor would also remain in its current location through 2016, with no potential for land use impacts to adjacent uses associated with the railroad relocation. In general, the overall relationship of site redevelopment to the surrounding area in 2016, including the CBD, would be similar to that under Alternative 2.

Redevelopment assumed under Alternative 3 would feature a similar mix of uses to those described under Alternative 1; however the overall density of redevelopment in 2016 would be substantially lower. Alternative 3 would also assume fewer residential units and employees (658 new residences and 1,980 new employees compared with 1,600 new residences and 3,100 new employees under Alternative 1) which would result in lower activity levels across the site. Maximum building heights under Alternative 3 would also be lower; 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 with 150 feet in Alternative 1), and 75 feet in Areas 4 and 6-10 (compared with 100 feet under Alternative 1). In general, the potential difference in building heights between onsite buildings and those existing in certain offsite areas would be less under Alternative 3 than under Alternative 1. For example, similar to Alternative 2 the potential difference in building heights between those assumed in Areas 9 and 10 and the offsite are to the south of Area 10 atop the bluff, would not occur to the extent under Alternative 1. As under Alternative 1, significant land use impacts to adjacent uses as a result of increased density and building heights would not be anticipated under Alternative 3.

The area in public parks and open space assumed under Alternative 3 would be substantially lower than Alternative 1 (15 acres compared to 33 acres) and would result in lower activity levels on the site. Fewer public street improvements under Alternative 3 would also result in lower activity levels and fewer public connections to the site, particularly from the downtown CBD. In addition, the BNSF railroad corridor would remain in its existing location which would limit the connections available on the site and provide separation between Areas 2-9. Despite these fewer connections, the overall relationship to the surrounding area, including CBD, would be similar to that under Alternatives 1 and 2 (see Section 3.2, **Air Quality**, Section 3.6 **Noise**, and Section 3.12, **Transportation**, for further details on potential additional activity level impacts including air quality, noise and traffic impacts).

Under Alternatives 2, 2A and 3 a lower amount of parks would be assumed to be developed within the shoreline area when compared to Alternative 1. This would result in a greater potential for building development within the shoreline area than under Alternative 1. Any building development within the shoreline area would be assumed to be consistent with applicable City of Bellingham Shoreline Master Program standards and significant land use impacts associated with development within the shoreline would not be anticipated.

Relationship to Existing Onsite Uses

The relationship to existing onsite uses under Alternatives 2, 2A and 3 would be similar to those conditions described under Alternative 1. However, because the railroad corridor would not be

relocated until after 2016 under Alternative 2A and not at all under Alternative 3, the location of the railroad corridor in Areas 2, 3, 5 and 8 would increase the potential for new onsite uses to be more directly exposed to noise, emissions and vibration as a result of proximity to the railroad corridor. These impacts would not be anticipated to be significant, however.

2026

Conversion of Land Uses

Redevelopment assumed for 2026 would represent the conclusion of the transition of the site to a mixed use urban village under Alternative 2; however, redevelopment would be at lower building density levels (6 million square feet compared with 7.5 million under Alternative 1). Public parks, trails and habitat restoration areas would be the same as described for the 2016 condition. Public street improvements would be less than under Alternative 1, with Wharf Street, the Cornwall Avenue Bridge and portions of Cornwall Avenue between Laurel Street and Oak Street not assumed.

Alternative 2A would assume the same mix of uses and level of redevelopment (land uses, parks, trails, habitat restoration) as Alternative 2. Public street improvements would be similar to those under Alternative 2, but the Laurel Street Bridge and Cornwall Bridge would be developed in 2026 compared to 2016 under Alternative 2.

Redevelopment assumed under Alternative 3 would also feature a similar mix of uses to those described under Alternative 1, but at substantially lower density levels (4 million square feet compared with 7.5 million). Public parks, trails and habitat restoration under Alternative 3 would be the same as for the 2016 condition. Public street improvements assumed under Alternative 3 would be lower than under Alternative 1 as well. Wharf Street, the Laurel Street Bridge, Commercial Street and the Commercial Street Bridge would not be provided under Alternative 3. The BNSF railroad corridor is also assumed to remain in its current location at 2026.

Relationship to Surrounding Uses

As described above, redevelopment assumed under Alternative 2 would include a similar mix of uses, but at lower density levels than Alternative 1 (see **Table 3.7-5 and 3.7-6** for a breakdown of assumed land uses and building uses onsite). Lower 2026 activity levels would also be expected under Alternative 2 than Alternative 1, due to fewer employees and residences. Approximately 7,200 new employees and 2,350 new residential units are assumed onsite in 2026 under Alternative 2 (compared to 8,700 employees and 3,000 residential units under Alternative 1). Building heights and parks, trails and habitat restoration areas would be the same as described under the 2016 condition. Public streets assumed under Alternative 2 would be similar to Alternative 1 but would provide less accessibility to the downtown CBD and areas to the south due to the fact that the Cornwall Avenue Bridge and Wharf Street would not be constructed. The overall relationship to the CBD would be anticipated to be similar to Alternative 1, although the overall activity within the CBD resulting from onsite populations would be less.

At full buildout, redevelopment under Alternative 2A is assumed to provide the same mix and density of building uses and the same amount of parks and open space, residential units and employees to those described under Alternative 2 (**Table 3.7-7** provides a breakdown of proposed land uses onsite). Public streets assumed under Alternative 2A would be the same as

those described for Alternative 2, however, the Laurel Street Bridge would not be provided until 2026, thus delaying construction and operational impacts associated with this bridge until 2026. This would result in fewer public access opportunities to the site particularly for the neighborhoods to the east and south. The overall relationship to the surrounding area, including the CBD would be similar to Alternative 1, although the activity levels in the CBD resulting from site redevelopment would be less than under Alternative 1.

Redevelopment assumed under Alternative 3 would provide a similar mix of uses at substantially lower densities when compared to Alternative 1 (4 million square feet compared to 7.5 million square feet). Building heights and parks, trails and habitat restoration areas would be the same as described under the 2016 condition. Under Alternative 3, Wharf Street, the Laurel Street Bridge, Commercial Street and the Commercial Street Bridge would not be included. This would result in fewer access connections to the site from the surrounding area, including the downtown CBD and neighborhoods to the south. Even with these fewer access opportunities and lower activity levels, the overall relationship between site redevelopment and surrounding neighborhoods, including the CBD, would be similar to Alternative 1.

Parks and trail features under Alternatives 2, 2A and 3 are assumed to be developed by 2016 with no new features assumed for 2026. As indicated under the 2016 condition, fewer parks would be provided in the shoreline area which could result in a greater potential for building development in this area. Any building development within the shoreline area would be assumed to be consistent with applicable City of Bellingham Shoreline Master Program standards and significant land use impacts associated with development within the shoreline area would not be anticipated.

Relationship to Existing Onsite Uses

At full buildout, the relationship to existing onsite uses under Alternatives 2, 2A and 3 would be similar to those conditions described under Alternative 1. However, because the railroad corridor would not be relocated under Alternative 3, the location of the railroad corridor in Areas 2, 3, 5 and 8 would increase the potential for new onsite uses to be more directly exposed to noise and vibration as a result of proximity to the railroad corridor; however, these impacts would be considered typical of railroad conditions in urban areas and would not be anticipated to be significant.

On an overall basis, Alternatives 2, 2A and 3 would also result in the creation of a new dense, urban mixed-use village in downtown Bellingham, and would convert a “brownfields area”, consistent with state and local goals and policies for infill growth. To the extent that Alternatives 2, 2A and 3 call for less density, and therefore, less employment and housing opportunities, it could be argued that these Alternatives would be less efficient relative to the use of the land, as compared to Alternative 1. The provision of a range of public amenities would be similar to Alternative 1, but at lower levels. Likewise, typical land use impacts associated with urban growth would also be less than under Alternative 1.

No Action Alternative

The No Action Alternative assumes that future development on the New Whatcom site would be consistent with the existing industrial zoning designations and standards. This alternative assumes approximately 1.04 million square feet of new light/marine industrial and warehouse

uses, along with the reuse of approximately 1.15 million square feet of retained industrial building space. It is assumed that no new public parks/open space, trails or residential uses would be constructed on the site.

A new marina (Marina Concept B) would be developed within the ASB area and is assumed to include up to approximately 600 moorage slips (compared to up to 460 moorage slips under Marina Concept A) and support facilities such as a boat launch, parking areas, gatehouse and pump out stations and a fueling facility. No opportunities for public access along the breakwater perimeter of the marina, including pedestrian trail or park areas, would be provided under Marina Concept B. Public access via the land side of the marina would be provided, along with new marine habitat features within the marina.

Similar to the development of Marina Concept A, this marina would result in conversion of the ASB to a new recreational resource for the site and surrounding community. The addition of moorage slips, boat launch and associated marina facilities would increase activity levels within Area 1 and would complement other marine-related uses in this area (see **Section 2.8.4** of Chapter 2 for more details on Marina Concept B). The marina would also be compatible with the marina and other moorage-related uses to the north of the I and J Waterway. Construction and operation of the marina and related facilities would result in additional air emissions, noise and traffic in the site area; however, such impacts would not be expected to be significant (refer to Section 3.2, **Air Quality**, 3.6, **Noise** and 3.12, **Transportation** for more information on potential marina-related impacts).

Marina Concept B would result in lesser levels of public access and amenities (park/trail features) than under Marina Concept A. From a land use perspective, it could be argued that this concept, along with the overall industrial redevelopment of the site, would be less consistent with the Port's and City's goals to transform the New Whatcom site to a mixed-use urban environment.

Redevelopment under the No Action Alternative would not be anticipated to substantially change the overall character or pattern of land use on the site. Continued industrial development on the New Whatcom site would not meet the City's goals for: increased density and housing within the Central Waterfront District and the CBD Core Village; providing opportunities for a range of employment; connecting the New Whatcom site with the CBD and surrounding neighborhoods; or providing public benefits through provision of parks, trails, open space and waterfront access.

Construction

Under the No Action Alternative, it is assumed that existing uses would remain and would not be displaced from the site. However, uses associated with GP operations would be terminated at the end of 2007 and a limited number of existing businesses could be displaced to accommodate the marina and associated features (marina access, boat launch and parking).

Site preparation and construction would also result in construction-related impacts including: dust and emissions from construction equipment and vehicles; increased noise levels; vibration associated with vehicles and construction activity; and increased traffic. These impacts would generally be lower than those described under the Redevelopment Alternatives due to the lower levels of assumed new uses, roadway improvements and public amenities (parks/trails).

Transition in Land Use Patterns

Under the No Action Alternative, no transition in land use patterns would occur. The site would remain in its current industrial use and no new mixed use development or housing would be provided. In addition, the New Whatcom site would provide limited public amenities (the marina would be provided but no new parks, trails, habitat restoration or substantial waterfront access would be assumed) and the site would not become a central destination for new community activities. The site would not achieve a level of density and mix of uses consistent with the goals and policies of the Comprehensive Plan. While the site would provide added industrial employment, such employment opportunities would not be as diverse as under the Redevelopment Alternatives. Further, it could be argued that the No Action Alternative would not represent an efficient use of land that is located adjacent to the CBD with available services. It is likely that the land use character of the site would remain separate and distinct from the CBD and surrounding neighborhoods. The site would, however, assist the City in meeting demands for industrial land use over the long-term; the City's industrial land supply would not be diminished.

Conversion of Land Uses

Under the No Action Alternative, it is assumed that redevelopment would be in accordance with the site's industrial zoning designations and land uses onsite would be similar to the existing light/marine industrial uses that currently exist. **Table 3.7-10** provides a breakdown of assumed land uses under the No Action Alternative.

Approximately 1.04 million square feet of new light/marine industrial uses would be constructed under the No Action Alternative, along with an approximately 1.15 million square feet of existing building spaces that would be occupied by industrial uses. For purposes of this Draft EIS, it is assumed that 50 percent of new uses and reuse of existing building space would occur by 2016 under the No Action Alternative. It is also assumed that existing uses that would remain onsite would include: the PSE Encogen power plant, the Bellingham Shipping Terminal and certain existing light/marine industrial uses. The BNSF railroad corridor would remain in its existing alignment. **Table 3.7-11** illustrates the type and square footage of new building uses onsite under the No Action Alternative.

Relationship to Existing Onsite Uses

Under the No Action Alternative, existing uses would be assumed to remain on the site and would not be displaced (limited number of businesses could be displaced as a result of the marina and associated facilities). New industrial uses would be constructed in accordance with the site's industrial zoning classification and as such, would be considered consistent with the existing industrial uses located on the site.

Relationship to Surrounding Uses

The No Action Alternative assumes approximately 2.19 million square feet of new and existing industrial uses in 2026 (compared to 7.5 million square feet of mixed use under Alternative 1). The No Action Alternative assumes approximately 1,600 new employees and no new residences (compared to approximately 8,700 new employees and 3,000 new residences under

Table 3.7-10
NO ACTION ALTERNATIVE – ASSUMED LAND USES (ACRES)

Land Use	2026
Building Footprint	44.6
Structured Parking Footprint	0.0
Surface Parking	44.9
Other Impervious Area	61.3
Street Right-of-Way	10.0
BNSF Railroad Corridor	6.9
Public Parks/Trails/Habitat Area	0.0
Vegetated Area	12.7
Marina Area	35.9
Total Acreage	216.3

Source: CollinsWoerman, 2007

Note: Other impervious area refers to setbacks, sidewalks, plazas, etc. Vegetated area refers to landscaped areas, outdoor public/private spaces, etc. In addition to the 216.3 acres identified above, the site also includes adjacent aquatic area.

Table 3.7-11
NO ACTION ALTERNATIVE – ASSUMED BUILDING USES (in Sq. Ft.)

Land Use	New Building Space in 2026
Light Industrial	425,000
Marine Industrial	425,000
Warehouse	190,000
Total New Square Footage	1,040,000

Source: CollinsWoerman, 2007

Alternative 1). Activity levels on the site would be lower than activity levels associated with the Redevelopment Alternatives. Activity on the site reflective of industrial use would differ from that associated with mixed use, including a greater use of trucks and a lower overall utilization of the land.

Under the No Action Alternative, new and/or existing industrial uses would be located throughout the site. Industrial land uses that would be assumed for the site could be considered less compatible with the surrounding commercial and residential neighborhoods (Central Business District, Lettered Streets, Sehome and South Hill neighborhoods) than would mixed uses due to the nature of industrial activities. Adjacent uses could experience increased potential for noise, odor, emission and vibration impacts that could result from operation of industrial use activities (see Section 3.2, **Air Quality**, Section 3.6 **Noise**, and Section 3.12, **Transportation**, for further details on potential additional activity level impacts including air quality, noise and traffic impacts). Depending on the specific nature of the industrial uses, these uses could potentially result in land use incompatibilities with certain adjacent uses.

The Central Business District serves as the hub for commercial, cultural and civic opportunities in the City and in Whatcom County. Continued industrial development on the New Whatcom site

would not meet the City's goals for increasing density and housing within the Central Waterfront District and the CBD Core Village. In addition, further development of industrial uses on the New Whatcom site would not realize an extension of downtown to the waterfront. Long-term industrial use of the site would likely result in a continuation of the separation of the waterfront with the CBD and surrounding neighborhoods, although the marina would result in some level of increased public access/connection to the site.

New site population on the site under the No Action Alternative would be anticipated to increase activity in the CBD. However, considering the lower site population and more limited connections, the increase in activity in the CBD from site uses would be substantially lower than under the Redevelopment Alternatives (Alternatives 1 through 3). In addition, increases in CBD activity levels associated with the employment uses on the site under the No Action Alternative would primarily be limited to weekday daytime hours, compared to evening and weekend activity associated with the residential and recreation uses under the Redevelopment Alternatives.

Compared to the Redevelopment Alternatives, the amount of public amenities provided under the No Action Alternative would be limited. Industrial development on the New Whatcom site would not include any new public parks, trails or habitat areas. No new pedestrian trails would be provided to the site which would limit pedestrian and bicycle links to/from the surrounding neighborhood areas (Central Business District, Lettered Streets, etc). No links to existing trails in the site vicinity would be provided and existing gaps in the City's trail system would remain.

The shoreline areas of the site would remain in their existing bulkhead/wharf condition and no facilities for public access would be provided other than the marina. Marina Concept B would create new habitat areas within the marina and new public access along the land side of the marina would result (see **Chapter 2** for further details on Marina Concept B). As indicated previously, the increased number of boat slips (up to 600 compared to up to 460 under Marina Concept A) would result in higher activity levels associated with the marina; however, these activity levels would not be substantially different from those under Marina Concept A and overall activity levels in this area would be lower than under the Redevelopment Alternatives. In general, the limited amount of public amenities and waterfront access would not provide the opportunity for the site to become a destination and attraction for the community.

Overall, access to the New Whatcom site under the No Action Alternative would be much more limited when compared to the Redevelopment Alternatives. Public street improvements would be made to existing streets but no new streets would be developed. Central Avenue, the Waterway Promenade, Bay Street Commercial Street and Bridge, Laurel Street and Bridge, the Cornwall Avenue Bridge, Log Pond Drive, Oak Street, Wharf Street and portions of Maple Street and Chestnut Street would not be constructed under the No Action Alternative. Vehicular access to the site from the downtown CBD and the surrounding neighborhoods would be limited and the site would not be perceived as an extension of the downtown CBD.

No public parks or trails would be provided within the shoreline area, which could result in the potential for industrial development within the shoreline along the entire shoreline of the site. Building development would be assumed to be consistent with the applicable City of Bellingham Shoreline Master Program and significant land use impacts would not be anticipated, however.

Indirect/Cumulative Impacts

The mix of uses assumed for the New Whatcom site under Alternatives 1 through 3 (including retail/service uses in addition to employment and residential uses) would be intended to provide a wide range of services to support site employees and residents; this could lessen the pressure for new offsite secondary development. However, to the extent that area property owners perceive an opportunity for redevelopment based, in part, on new employees and residents associated with New Whatcom, some new development in the area could be indirectly generated. Any development in the area generated indirectly by New Whatcom redevelopment would likely occur incrementally over time and would be assumed to be consistent with City of Bellingham land use goals and regulations; therefore, significant land use impacts would not be anticipated.

Land uses assumed under mixed-use redevelopment of the New Whatcom site, along with future development in the area (including the Bellwether on the Bay Phase II, 1010 Morse Square and Bayview Towers; see **Chapter 2** for more information on these planned projects), would contribute to cumulative employment/population growth and intensification of land uses in the City of Bellingham. To the extent that such development is consistent with the City of Bellingham Comprehensive Plan and zoning regulations, future intensification of land use would help achieve state and local goals for directing growth toward urban centers/villages, limiting sprawl, and focusing growth in areas with adequate public services and utilities.

In addition to the known projects listed above, the City has initiated planning for a new over-water trail connection between Boulevard Park and Area 10 of the New Whatcom site, as well as a high-speed bicycle trail along the base of the bluff. These trails would provide additional direct pedestrian and bicycle links between the New Whatcom site and Boulevard Park (and areas farther west). With new mixed-use populations on the New Whatcom site, these trail connections would likely result in increased use of Boulevard Park. The over water trail and high-speed trail would be subject to a separate permitting and environmental review processes (see **Chapter 2** for more information on these planned projects).

3.7.3 Mitigation Measures

Ultimately, the guidelines and development standards of the Master Development Plan (to be adopted through the Port's *Comprehensive Scheme of Harbor Improvements* and the City's Sub-area plan approval process), the Development Agreement between the Port and City (and other applicable zoning and development regulations) and the Planned Action Ordinance would guide redevelopment of the New Whatcom site over the long-term. These plans, regulations and standards, along with individual project review by the City of Bellingham, would serve as mitigation to preclude any potential significant land use impacts from future redevelopment and ensure compatibility among site uses and uses in the site vicinity.

Specific building development plans, layouts for uses and building footprints are not established at this stage of the redevelopment process. For purposes of this Draft EIS, assumptions were made regarding the mix, type and density of uses in given areas of the site to address on and offsite land use compatibility issues on a "maximum potential impact" basis. The actual mix and layout of uses and buildings would be determined by the Port, the City and/or future developers based on future market conditions and the specific development regulations and standards that

are ultimately adopted. The following mitigation measures would further address potential land use compatibility issues, particularly related to adjacent uses and uses within the site itself.

- Principles of the New Whatcom master planning process, and other standards and guidelines defined through the public planning process to date, are intended to minimize the potential for land use impacts to surrounding areas. Features incorporated into the planning process (and featured in Alternatives 1 through 3) that address the relationship of new uses on the site to surrounding uses include:

  - Incorporation of land uses that are compatible with and complement surrounding uses, densities and patterns, and provide a range of opportunities for existing and new tenants.

  - Provision of a mix of uses that create opportunity for the establishment of a live-work-play environment.

  - Provision of a substantial amount of public parks, trails and open space area that can serve as a local and regional resource.

  - Dedication of the majority of the site's waterfront to public access.

  - Incorporation of a marina concept that is intended to be complementary with a mixed-use urban village on the site.

  - Provision of vehicular and pedestrian connections linking the surrounding community (CBD) with the site and the waterfront.

- Specific development regulations and design guidelines could be established as part of the Master Development Plan and/or Development Agreement to ensure that new land uses are compatible with existing retained uses onsite.

- For potential residential uses in direct proximity to the BNSF railway corridor, BST and ongoing industrial operations, building orientation, design and materials to reduce interior sound levels could be considered as part of the future permit process.

- Redevelopment would be phased over time, consistent with market demands, as well as the Master Development Plan, Development Agreement and applicable regulations and standards.

- Additional mitigation measures related to air quality, noise, views, transportation and public services would be provided to lessen overall impacts from redevelopment of the site (see Section 3.2, **Air Quality**, Section 3.6, **Noise**, Section 3.10, **Aesthetics/Light and Glare**, Section 3.12, **Transportation** and Section 3.13 **Public Services** for further details).

3.7.4 Significant Unavoidable Adverse Impacts

Redevelopment under Alternatives 1 through 3 would result in the intensification of development on the New Whatcom site, an extension of the Central Business District and increased site

activity levels. The site would transition to a mixed-use neighborhood. Alternatives 1 through 3 could also result in the displacement of some existing uses. Over the long-term, the land use character of the site would change from a historically industrial site to reflect a new, dense urban mixed-use development.

Significant adverse land use impacts would not be anticipated under Alternatives 1 through 3. It is assumed that redevelopment would occur consistent with the adopted standards, guidelines, and regulations for New Whatcom, including the Master Development Plan, the Port and City Development Agreement and the Planned Action Ordinance, as well as with the City's Comprehensive Plan and Shoreline Master Program.

The No Action Alternative would not result in the transition of the site to a mixed-use neighborhood. The No Action Alternative could result in new industrial activities located proximate to residential uses to the east and south of the site and, depending on the specific nature of the industrial uses, could potentially result in land use incompatibilities with adjacent residential uses.