Chapter 2

Description of Proposed Action(s) and Alternatives

CHAPTER 2
DESCRIPTION OF PROPOSED ACTION(S) AND ALTERNATIVES

This chapter of the Draft Environmental Impact Statement (DEIS) describes the Proposed Action(s) and Alternatives for the New Whatcom Redevelopment Project (New Whatcom). Previous site activities and pertinent planning activities related to the Proposed Action(s) are also discussed. Please see Chapter 1 of this document for a summary of the findings of this DEIS and Chapter 3 for a detailed presentation of the affected environment and significant environmental impacts of the Proposed Action(s) and Alternatives.

2.1 INTRODUCTION

The Port of Bellingham (Port) has been analyzing long-term redevelopment opportunities for the New Whatcom site. The Port and the City of Bellingham (City) are working together to formulate and implement a Master Development Plan that would, if approved and implemented, be intended to transform the New Whatcom site into a new neighborhood with residences, shops, offices, marine and light industry, institutional uses (e.g. Western Washington University), as well as parks, trails and shoreline amenities along Bellingham Bay. The Master Development Plan would include substantial new opportunities for public access to the waterfront that do not exist under current conditions. Full buildout of the New Whatcom site would be expected to occur over a 20-year period.

The Port also envisions entering into a Development Agreement with the City that will further guide long-term redevelopment of the site. As part of its efforts to plan and redevelop the site, the Port will propose amendments to the Port's *Comprehensive Scheme of Harbor Improvements* incorporating the Master Development Plan. Concurrent with the adoption of a Development Agreement, it is expected that the City will adopt a new Sub-area Plan for the area (to be known as the *New Whatcom Master Development Plan*), along with implementing land use regulations and a Planned Action Ordinance.

The New Whatcom site includes approximately 216.3 acres of contiguous waterfront property and adjacent aquatic area in central Bellingham (see Vicinity Map, **Figure 2-1** and Site Map, **Figure 2-2**). The adjacent aquatic area associated with the New Whatcom site is included within the area analyzed in the Whatcom Waterway SEIS (See Figure 1-1 of the Whatcom Waterway Final SEIS, 2007, for more information). Currently, the Port owns 148.9 acres on the site, the City owns 21.2 acres (including 12.8 acres of right-of-way) and 46.2 acres of the site are owned by the State of Washington (managed by the Department for Natural Resources) or held in private ownership. The 35.9 acre ASB included in the site boundary is managed by the Port and partially owned by the Port (31.7 acres) and the State of Washington (4.2 acres). See Land Ownership Map, **Figure 2-3**, for an illustration of the distribution of land ownership on the site. For purposes of this EIS, the approximately 216.3-acre site, which is a combination of Port and non-Port owned land, and adjacent aquatic area are termed the New Whatcom site.

For descriptive purposes, the New Whatcom site has been divided into 10 redevelopment areas comprising 180.4 acres, as illustrated in **Figure 2-4,** Existing Conditions and described later in **Table 2-1**. The 35.9-acre ASB area is also included within the site boundary and is sometimes referenced as Redevelopment Area 11 in this document. A true north and "project north" have been designated to simplify descriptions of cardinal directions onsite and is referenced on all figures.

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Figure 2-1
Vicinity Map

New Whatcom Redevelopment EIS

BLUMEN CONSULTING GROUP, INC	Figure 2-2 Site Map	New Whatcom Redevelopment EIS

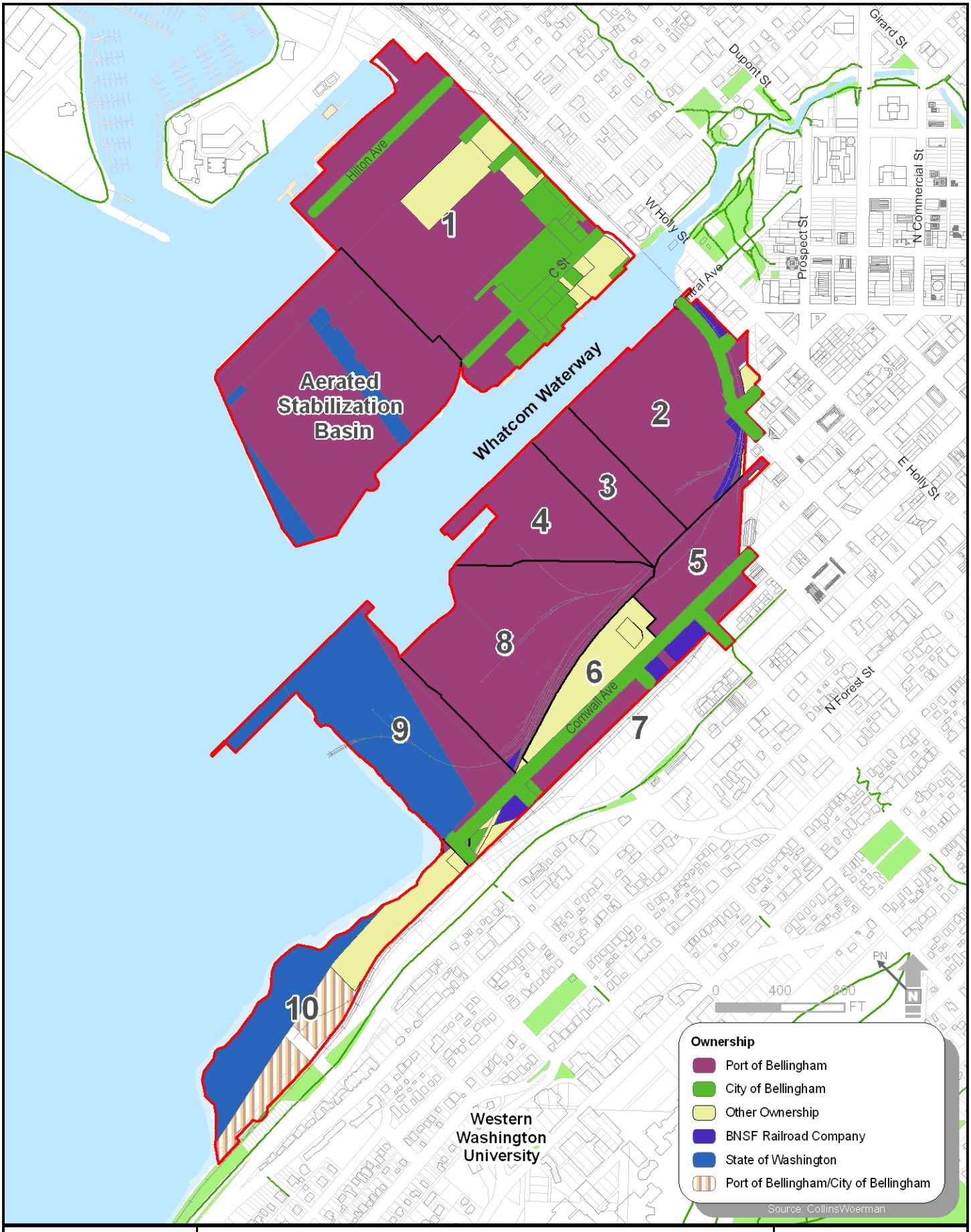

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Figure 2-3
Land Ownership

New Whatcom Redevelopment EIS

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Figure 2-4
Existing Conditions w/ Building Numbers
2007

New Whatcom Redevelopment EIS

The site lies within the City of Bellingham's Central Business District Neighborhood Planning area. The site is generally bounded by Bellingham Bay to the west, Roeder Avenue and State Street to the north and east, and the Burlington Northern Santa Fe (BNSF) Railroad and bluff to the south. The Central Business District Neighborhood is generally bounded by the Columbia and Lettered Streets neighborhoods to the north; the Sunnyland and York neighborhoods to the east, and Cornwall Avenue and the Sehome and South Hill neighborhoods to the south.

2.2 BACKGROUND

For over a decade, the Port and City have been collaborating with citizen groups, business groups, agencies and tribes to develop a new community "vision" to guide the transformation of the waterfront from a contaminated, heavy industrial area to a thriving urban neighborhood. Out of this multi-year, collaborative planning process, a city center waterfront "vision" has been developed which anticipates a mixed-use neighborhood that includes commercial, institutional, educational, industrial, retail services and residential uses which will provide new employment and housing opportunities. The following section summarizes the key milestones and components of the New Whatcom planning and visioning process.

2.2.1 Summary of Overall Planning Efforts

Bellingham Bay Demonstration Pilot

In 1996, a cooperative partnership among federal, state, local and tribal agencies was formed to develop a new approach to expedite sediment cleanup, source control and habitat restoration for sediment cleanup sites around Bellingham Bay – the Bellingham Bay Demonstration Pilot. In 2000, the Washington Department of Ecology (Ecology), as lead agency for the Demonstration Pilot, issued the *Bellingham Bay Comprehensive Strategy EIS*, which was designed to help guide future decisions on the cleanup and restoration of various sites throughout the Bay area. Several areas within or adjacent to the New Whatcom site are subject to this Demonstration Pilot and *Comprehensive Strategy,* including the Aerated Stabilization Basin (ASB) cleanup and restoration (historically used as a discharge facility for waste associated with industrial operations) and the overall Whatcom Waterway cleanup. The Port and Ecology are co-managers of the Demonstration Pilot.

Waterfront Redevelopment Planning

After the 2001 closure of pulp and chemical operations at the Georgia-Pacific plant on the Bellingham waterfront, the Port and City began to analyze potential redevelopment opportunities for the Georgia-Pacific property. In 2003, the Port and City established the Waterfront Futures Group (WFG) to obtain citizen input regarding a redevelopment vision for this site and a long-term plan for the entire Bellingham waterfront. The Port and City selected members of the community and the Lummi Nation to serve as WFG team members. Over an 18-month period, the WFG team developed the *Waterfront Vision and Framework Plan: Connecting Bellingham to the Bay* which articulated the group's vision, recommendations and guiding principles for future development of Bellingham's waterfront (see Section 3.8, **Relationship to Plans and Policies**, for more information on the WFG vision). The *Waterfront Vision and Framework Plan* provided a framework and citizen's vision for the future of the waterfront and guiding principles for managing future water-related development. The *Waterfront Vision and Framework Plan* also emphasized a commitment to: stimulate public cooperation and investment in the planning,

acquisition and improvements at the waterfront; protect legal rights and responsibilities of all parties; and recognize the environmental, cultural and economic systems affecting Bellingham Bay. The *Waterfront Vision and Framework Plan* was finalized and presented to the City and Port in December of 2004. Vision Statements and 2004 Framework Policies of the WFG were adopted by the City and incorporated into the City's *Comprehensive Plan* in 2006.

Over the past two years, the Port and City have continued the planning process for the New Whatcom site and have engaged a citizen advisory committee, the Waterfront Advisory Group (WAG), (established in 2005) as well as state and federal agencies, tribes, the City Planning Commission, consultants, elected officials and the community in this process. In March 2006, a set of "New Whatcom Guiding Principles and Implementation Strategies" was presented to the Port Commission and City Council. These guidelines were derived from and incorporated the WFG guiding principles based on four major goals, including:

1. Improve waterfront access;
2. Restore the health of land and water;
3. Promote a healthy and dynamic waterfront economy; and
4. Reinforce the inherent qualities of each place on the waterfront.

Under each goal, a set of principles and implementation strategies were identified to guide the ongoing master planning process (see Section 3.8, **Relationship to Plans and Policies**, for more information).

As part of ongoing planning and public participation efforts, open houses, workshops and public meetings were held in 2006 and preliminary design concepts were formulated which were then presented to the public for comment. Various design concept proposals were submitted by a number of independent parties and numerous comments were provided by the public.

In September 2006, a *Draft Framework Plan* was prepared by the Port and City based on the comments and recommendations received over the multi-year planning effort. This *Draft Framework Plan* was used by the Port and City in their assessment of the potential financial implications of long-term redevelopment of the site. Over the past several months, refinement of the assumptions contained in the *Draft Framework Plan* has occurred to arrive at various alternative concepts to be evaluated in this Draft EIS (see description of EIS Alternatives in **Section 2.8**).

Further evaluation and public input (via the EIS, ongoing master planning and ultimately the Port and City decision-making processes) will lead to consideration and potential adoption of a Master Development Plan for New Whatcom (see **Section 2.3** and **Figure 2-5** in this Chapter of the Draft EIS for more information on the anticipated approval process).

Property Acquisition and Cleanup Efforts

In 2004, the Port amended its *Comprehensive Scheme of Harbor Improvements* to include the ASB as a potential site for a marina. On June 7, 2004, the Port commenced a condemnation action to exercise its powers of eminent domain to acquire the ASB for use as a marina. The Port and Georgia-Pacific entered into negotiations which resulted in the January 2005 acquisition of Georgia-Pacific's 137 acres of waterfront property, including the approximately 36-acre ASB and approximately 101 acres of upland property. Georgia-Pacific transferred the property to the Port in exchange for the Port agreeing to conduct specific environmental cleanup

efforts on the New Whatcom site and in the adjoining Whatcom Waterway. Georgia-Pacific continues to operate its tissue mill through a reservation in the purchase-sale agreement with the Port but has announced the intent to terminate mill operations by the end of 2007.

Since 1996, the Port and Ecology have been engaged in the Model Toxics Control Act (MTCA) process to develop an approach to cleanup contaminated sites in and around Bellingham Bay. Ecology is implementing the Model Toxics Control Act (MTCA) process which governs how existing contamination is to be investigated and remediated within and adjacent to the New Whatcom site. Ecology serves as the lead agency under SEPA for remediation projects subject to MTCA.

Ecology was the lead SEPA agency for the *Comprehensive Strategy for Bellingham Bay EIS (Final EIS*, 2000); this Final EIS has been updated through a supplemental EIS associated with the Whatcom Waterway site. Ecology's decision-making processes under MTCA and SEPA are being performed with the recognition that the New Whatcom site could undergo a transition from industrial use to a mixed use/commercial area. This New Whatcom Redevelopment Project Draft EIS incorporates Ecology's SEPA review of the *Comprehensive Strategy for Bellingham Bay* by reference, including the supplemental review for the Whatcom Waterway site, in order to ensure appropriate and necessary integration of site cleanup of the ASB under MTCA and its future redevelopment as a marina (see **Section 2.3.1** of this Chapter for more information).

This EIS is being conducted in coordination with the evaluation of environmental impacts and benefits associated with the remediation of seven different MTCA sites within the site area. These sites include the Whatcom Waterway, Chlor-Alkali Facility, Pulp & Tissue Mill, Central Waterfront, I&J Waterway, Cornwall Avenue Landfill, and the R.G. Haley site. Refer to **Section 2.3.1** of this Chapter for further discussion on cleanup actions associated with the Whatcom Waterway, and Section 3.5, **Environmental Health**, in Chapter 3 of this Draft EIS for a discussion on the cleanup process for MTCA sites in the site area.

The January 2005 Purchase and Sale Agreement between the Port and Georgia-Pacific also included a Demolition Plan that outlined provisions for Georgia-Pacific to demolish certain existing buildings that were deemed unsuitable for reuse. Building vacation and demolition consistent with the approved plan commenced in 2005 and is still in progress. Georgia-Pacific is required to fulfill the stipulations of the Demolition Plan by one year after the Georgia-Pacific lease or reservation expires, which is slated for June 2008.

Interlocal Agreements

On January 4, 2005, the Port and City entered into the Interlocal Agreement regarding the "New Whatcom Special Development Area" that defined steps that would be undertaken to implement the redevelopment vision for the New Whatcom site. These steps include completion by the Port of a comprehensive environmental cleanup of the site and the adjoining waterways, as well as the development and maintenance of all public marine transportation infrastructure, and construction by the City of new land-side infrastructure (roads, utilities, parks and trails). The infrastructure to be provided and the timing of that infrastructure investment are intended to be identified by the parties in the Development Agreement, consistent with an approved Master Development Plan. The Interlocal Agreement outlined the process for more specific planning of the New Whatcom site, including the creation of a Development Agreement and Master

Development Plan. The Interlocal Agreement also designated the Port as lead agency under SEPA for this EIS.

A second Interlocal Agreement regarding implementation of the WFG recommendations for redevelopment of the waterfront and formulation of the ongoing WAG was executed by the Port and City in January 2005. See Section 3.8, **Relationship to Plans and Policies**, for more information on the Port and City's interlocal agreements.

City of Bellingham Planning Efforts

Consistent with the January 4, 2005 Interlocal Agreement, the City adopted the updated *Bellingham Comprehensive Plan* in June 2006 and designated the New Whatcom site as "Industrial/Waterfront Mixed Use". The Plan promotes the development of an urban village (the Central Waterfront District Village and CBD Core Village) on the site under the Waterfront Mixed Use zoning designations, subject to approval of a Master Development Plan. As part of the update to the *Comprehensive Plan*, the City adopted policies that establish the framework for redevelopment of the New Whatcom site. The City also amended the Central Business District Neighborhood Plan and zoning to designate the site for industrial/waterfront mixed uses, upon adoption of a Master Development Plan.

Concurrent with review of the New Whatcom Master Development Plan, the City will consider the necessary implementing regulations that will govern redevelopment of the site (including development regulations and design guidelines), consistent with the *Comprehensive Plan*. This Master Development Plan will outline the preferred location, scale and mix of uses, infrastructure improvements, public access amenities and phasing. The Master Development Plan will be implemented through corresponding development regulations, including zoning, design and development standards, which will be referenced in a Development Agreement and incorporated into the City's Zoning Code. Prior to such adoption, the zoning of the site remains Industrial.

In addition, the City is currently updating its *Shoreline Master Plan Program* (SMP). As part of that effort, specific designations and development regulations for the New Whatcom site's shoreline areas are being considered. Upon adoption by the City and Ecology, these designations and development regulations, including permitted uses, setbacks and buffer requirements, allowable heights, etc. will govern future redevelopment of that portion of the site within the shoreline management jurisdiction area. Until adoption, the City's current SMP will apply. Refer to Section 3.8**. Relationship to Plans and Policies** in Chapter 3 of this Draft EIS, for discussion on the relationship of the SMP to site development assumed under the EIS Alternatives.

Whatcom Waterway Harbor Line Relocation and Channel Re-designation

In July, 2006, the Port filed an application requesting that the State Department of Natural Resources (DNR) relocate portions of the existing inner and outer harbor lines. The Port requested that DNR adjust the harbor lines and harbor areas to be consistent with proposed changes in land use, including priority aquatic land uses, such as new marina facilities, habitat and remediation of historic contamination. The redefined harbor areas would continue to support water-dependent commerce uses including uses at the Bellingham Shipping Terminal

and the Fairhaven Terminal, and navigation and commerce uses in deepwater areas. It is anticipated that the harbor line adjustment would provide opportunities for the Port to implement long-term, bay-wide planning goals including development of transient moorage, restoration and development of aquatic habitat, and improved public access to the waterfront. This request is currently under consideration by DNR. The EIS Alternatives, described later in this Chapter, assume approval of the relocation of the inner and outer harbor lines.

As part of a separate process, the United States Congress recently approved (November 2007) a request by the Port of Bellingham to deauthorize the federal channel designation in the inner portion of the Whatcom Waterway to allow for local control of the waterway. This change applies to the inner waterway from Roeder Avenue to the northern end of the Bellingham Shipping Terminal. It is anticipated that deauthorizing this portion of the federal channel to create a locally-managed, multi-purpose inner waterway will provide increased flexibility in permitted uses in the waterway, compatible with habitat restoration, public access and small boat moorage. A 30-foot deep federal channel will be maintained along the outer waterway adjacent to the existing Bellingham Shipping Terminal in order to continue to be able to accommodate deep-water vessels including research ships and cruise ships.

2.3 ENVIRONMENTAL REVIEW PROCESS AND PURPOSE

Per the January 2005 Interlocal Agreement between the Port and City, the Port of Bellingham is serving as the lead agency under the State Environmental Policy Act (SEPA) (RCW 43.21C and WAC 197-11-050) for the New Whatcom project.

In April 2007, the Port of Bellingham (Port) began the formal environmental review process for the proposed New Whatcom Redevelopment project. As lead agency under SEPA, the Port initiated the process by gathering public and agency input regarding specific topics and issues that should be analyzed as part of this Environmental Impact Statement.

On April 17, 2007, the Port issued a *Determination of Significance* and initiated an expanded scoping process for this EIS. In accordance with SEPA (RCW 43.21C), the SEPA Rules (WAC 197-11) and the Port of Bellingham's SEPA regulations, a *Draft Scoping Document* was issued on April 19, 2007, which provided a preliminary scope for the EIS, including a proposed range of alternatives and a preliminary list of elements of the environment to be studied.

From April 17 through May 11, 2007, the Port conducted the scoping comment period during which the public, agencies and tribes were encouraged to provide input regarding the scope of the EIS and offer feedback on the *Draft Scoping Document*. During the scoping comment period, 61 comment letters and emails were received including comments from: the Department of Ecology, Lummi Nation, City of Bellingham Planning Commission, Bellingham Bay Foundation, People for Puget Sound, Clean Water Alliance and other organizations, agencies and private citizens (see **Appendix A**, List of Written Comment Letters Received During EIS Scoping Period). The Port also held two public scoping meetings on April 25 and May 2, 2007 during which 27 citizens provided testimony.

Based on the input obtained during scoping and review of prior environmental documents and other pertinent information, the scope for this EIS was modified and finalized by the Port with input from the City. The EIS scope was identified in the *Final Scoping Document* issued by the

Port of Bellingham's SEPA Official on July 13, 2007 (see **Appendix B,** Final Scoping Document). The following environmental elements were identified for analysis in this EIS:

1. Earth
2. Air Quality
3. Water Resources
4. Plants and Animals
5. Environmental Health
6. Noise
7. Land Use
8. Relationship to Plans and Policies
9. Population, Employment and Housing
10. Aesthetics/Light and Glare
11. Historic and Cultural Resources
12. Transportation
13. Public Services
14. Utilities

On July 13, 2007, the Port's SEPA Official also issued the *Summary of Comments to the Scope of the Environmental Impact Statement for the New Whatcom Redevelopment Project and Responses by the SEPA Responsible Official* (see **Appendix A**). This document included a summary of the most common or significant comments provided during the scoping period and a description of how the comments would or would not be addressed in the Draft EIS, as applicable.

EIS Analysis

This Draft EIS is intended to address the probable significant adverse impacts that could occur as a result of the approval by the Port of amendments to the *Comprehensive Scheme of Harbor Improvements*, adoption by the City of the Master Development Plan and implementing regulations, and potential future redevelopment activities on the site during the 20-year build-out horizon. A sufficient range of alternatives (See **Section 2.8** below) that: 1) encompasses a broad range of redevelopment that the site can reasonably accommodate (from continued industrial use of the property under the No Action Alternative to 7.5 million square feet of mixed use redevelopment); and, 2) meets the applicant's objectives, has been identified and analyzed to provide decision makers with relevant information needed to make decisions about the Proposed Actions. None of the alternatives should, however, be considered a definitive plan for the New Whatcom site. The alternatives function to provide representative levels and types of redevelopment and supporting infrastructure for analysis in this EIS. Refer to **Section 2.8** of this chapter for detail on the EIS Alternatives.

This EIS also considers separate actions that are known to be planned or proposed on the site or in the site area; these separate actions are analyzed on a cumulative basis together with the EIS Alternatives. (Separate projects would occur independent of New Whatcom redevelopment, subject to applicable permits and approvals.) Refer to **Section 2.9** of this chapter for more information on Separate Actions/Background Projects.

Planned Action Review

It is also proposed that certain elements of future redevelopment of the New Whatcom site be designated by the City of Bellingham as a Planned Action, pursuant to SEPA (WAC 197-11-168(C)). Under SEPA, the basic steps in designating Planned Action projects are to: 1) prepare an EIS; 2) designate the project a Planned Action by adoption of an ordinance; and, 3) review future applications for redevelopment permits for consistency with the designated Planned Action. After issuance of this EIS, it is contemplated that the City of Bellingham will adopt the New Whatcom Planned Action Ordinance.

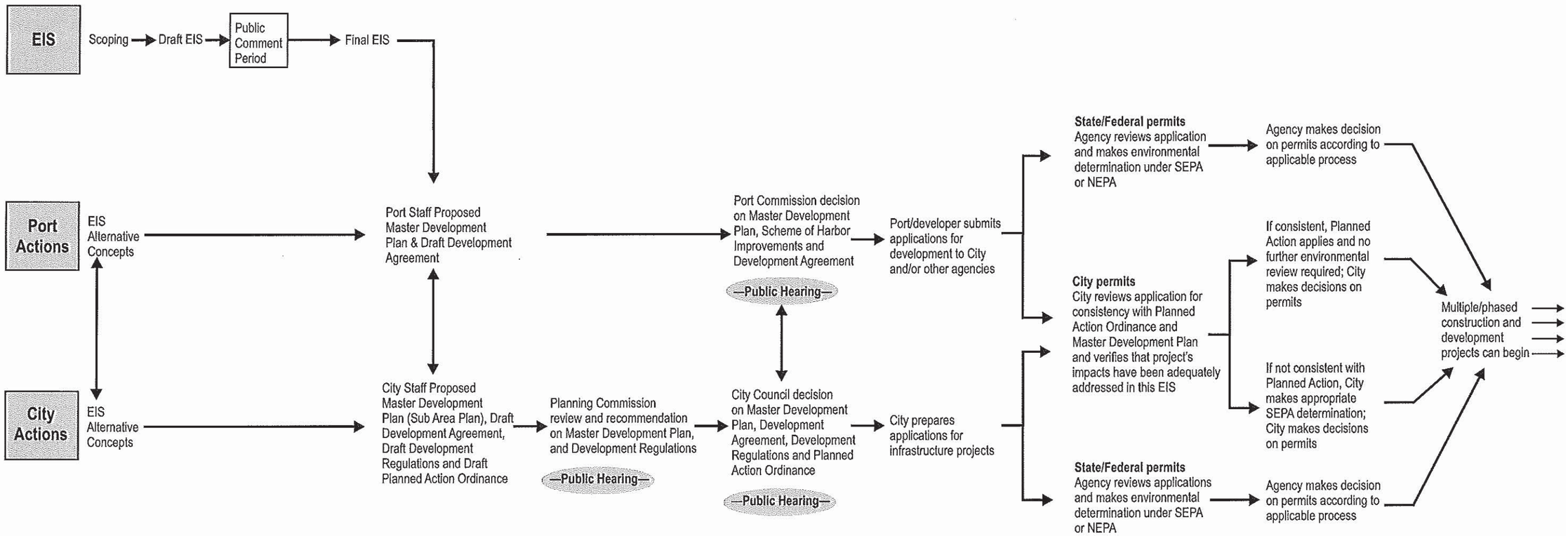
Redevelopment projects anticipated to be included in the Planned Action Ordinance have been identified in this EIS (see **Section 2.10**). The City's Planned Action Ordinance, once adopted, would reflect a decision by the City that adequate environmental review has been completed for these identified projects and that further environmental review under SEPA will not be necessary, if it is determined that future redevelopment is consistent with the provisions of the Planned Action Ordinance, the Master Development Plan and the environmental analysis contained in this EIS. The Planned Action Ordinance would pertain to future development features that have been reasonably defined for environmental review purposes and that are subject to City of Bellingham permit approvals. Specific projects that have not been reasonably defined at this stage to allow environmental review could require additional environmental review at the time of permit application submittal, including review under SEPA and the National Environmental Policy Act (NEPA) (see **Section 2.10** for identification of those projects that have not been defined and may require additional environmental review). For future redevelopment projects subject to state and federal permits, the appropriate agencies would determine whether further environmental review is required.

When specific development is proposed in the future, determinations would be made by the City on whether the potential impacts are within the parameters analyzed and mitigation identified in this EIS and adopted as part of the Planned Action Ordinance. If not, additional environmental review may be required. However, if potential impacts are within the parameters analyzed in this EIS and adopted as part of the Planned Action Ordinance, further environmental analysis would not be required under SEPA to support permits and approvals by the City for construction and buildout on the site. In order to highlight the overall environmental review and permit approval process for New Whatcom redevelopment and actions to be taken by the Port and City, the following flow chart was prepared. **Figure 2-5** illustrates the anticipated approval process for the New Whatcom Redevelopment Project.

2.3.1 Prior Environmental Review

Environmental review under SEPA has been accomplished for prior actions that pertain to the New Whatcom site, as well as for other actions in the area. The following Environmental Impact Statements are hereby incorporated by reference into this EIS, per WAC 197-11-635, because they contain certain information applicable to this New Whatcom Redevelopment Project EIS.

- Department of Ecology, *Bellingham Bay Comprehensive Strategy Draft EIS*, July 1999.
- Department of Ecology, *Bellingham Bay Comprehensive Strategy Final EIS*, October 2000.



New Whatcom Redevelopment EIS

Figure 2-5
Environmental Review and Approval Process

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- City of Bellingham, *Final Environmental Impact Statement for: The City of Bellingham, Bellingham Urban Growth Area, Five-Year Review Areas; and Whatcom County Urban Fringe Subarea,* July 2004.
- Port of Bellingham, *SEPA Environmental Checklist for a Proposed Amendment to the Comprehensive Scheme of Harbor Improvements for Squalicum Harbor, April 2004.*
- Department of Ecology, *Draft Supplemental Environmental Impact Statement: Bellingham Bay Comprehensive Strategy, Whatcom Waterway Cleanup Site,* October 2006.
- Department of Ecology, *Final Supplemental Environmental Impact Statement: Bellingham Bay Comprehensive Strategy, Whatcom Waterway Cleanup Site, September 2007*.

Bellingham Bay Demonstration Pilot EIS

In 2000, Ecology, as lead agency for the Bellingham Bay Demonstration Pilot, issued the final *Bellingham Bay Comprehensive Strategy EIS*, which was designed to help guide future decisions on the cleanup and restoration of various sites throughout the Bay area. The EIS analyzed two Alternatives: No Action/No Bellingham Bay Comprehensive Strategy and Implementation/Bellingham Bay Comprehensive Strategy. The EIS analyzed the following elements of the environment: geology, water, sediment, environmental health, fish and wildlife, land use, shoreline use, recreation/public use, air and noise, and cultural resources. The *Bellingham Bay Comprehensive Strategy EIS* analyzed several areas within or adjacent to the New Whatcom site including the ASB cleanup and restoration (historically used as a discharge facility for waste associated with industrial operations) and the overall Whatcom Waterway cleanup. (Refer to Section 3.8, **Relationship to Plans and Policies,** in Chapter 3 of this Draft EIS for more information.)

City of Bellingham Urban Growth Area EIS

The *Final Environmental Impact Statement for: The City of Bellingham, Bellingham Urban Growth Area, Five-Year Review Areas; and Whatcom County Urban Fringe Subarea,* (July 2004) analyzed the probable significant impacts of the most recent update to the *Bellingham Comprehensive Plan*. The EIS analyzed four Alternatives: No Action, Infill, Adjusted UGA (Urban Growth Area) and Infill and Adjusted UGA. The EIS evaluated the following elements of the natural environment: earth, agricultural crops, air quality, water resources, plants and animals, natural resources and scenic resources and the following elements of the built environment: environmental health, land use, population, employment, housing, land supply, light and glare, aesthetics and urban design, historic and archaeological resources, transportation and circulation, and public services and facilities (refer to Section 3.8, **Relationship to Plans and Policies,** in Chapter 3 of this Draft EIS for more information on the *Bellingham Comprehensive Plan*).

SEPA Environmental Checklist for a Proposed Amendment to the Comprehensive Scheme of Harbor Improvements for Squalicum Harbor

The *SEPA Checklist for a Proposed Amendment to the Comprehensive Scheme of Harbor Improvements for Squalicum Harbor* (April 2004) analyzed the environmental impacts of a proposed amendment to the Port's *Comprehensive Scheme of Harbor Improvements* to add certain waterfront and in-water land (an area generally corresponding to Redevelopment Area 1,

the Aerated Stabilization Basin (ASB) and adjacent in-water land out to the Outer Harbor Line) to the Squalicum Harbor planning area. The SEPA Checklist also analyzed the environmental impacts of the *Central Waterfront Redevelopment Plan* that detailed three options for potential future land use and development on the property in question. One option analyzed development under current industrial/marine-oriented land use trends and two options analyzed scenarios for mixed-use development on the site. All three options provided for the future redevelopment of the ASB as a marina. (Refer to Section 3.8, **Relationship to Plans and Policies,** in Chapter 3 of this Draft EIS for more information.)

Whatcom Waterway Cleanup Supplemental EIS

Environmental review by Ecology under SEPA was recently completed for the Whatcom Waterway Cleanup project, a component of the *Bellingham Bay Demonstration Pilot* program described above. The upland portion of the New Whatcom site lies adjacent to the Whatcom Waterway that has been impacted by contaminants historically released from industrial waterfront activities, including mercury discharges from the former Georgia-Pacific Chlor-Alkali Plant.

The *Bellingham Bay Comprehensive Strategy Final EIS* has been updated through a supplemental EIS associated with the Whatcom Waterway site. The *Draft Supplemental Environmental Impact Statement: Bellingham Bay Comprehensive Strategy, Whatcom Waterway Cleanup Site (Whatcom Waterway SEIS)*, was issued in October 2006 by Ecology for public review and comment. The Draft SEIS analyzed updated data regarding contamination in the waterway and vicinity, as well as changes in land use assumptions regarding the Bellingham waterfront including the potential for development of a marina at the current site of the ASB.

The Draft SEIS analyzed eight alternatives featuring different levels of remediation, remediation methods, levels of habitat restoration and risk. For the Whatcom Waterway, the Draft SEIS Alternatives included the following general assumptions: Alternative 1 assumed a limited-use channel; Alternative 2, 3, 7 and 8 assumed a channel dredged to accommodate industrial uses; and, Alternatives 4, 5 and 6 assumed a channel dredged for a multi-purpose channel. For the ASB, the Draft SEIS Alternatives included the following general assumptions: Alternatives 1, 2 and 4 assumed the capping of sediment with no opening of the ASB to the Bay; Alternative 3 assumed the filling of the ASB with dredged material from the waterway and other areas; and, Alternatives 5 through 8 assumed cleanup to accommodate marina use and aquatic habitat – the ASB was assumed to open to the Bay under these alternatives. The Draft SEIS analyzed the following elements of the environment: geology, water and environmental health; fish and wildlife; land use, navigation and public shoreline access; air and noise; and cultural resources. The Final SEIS was issued by Ecology in September 2007.

The *Whatcom Waterway Draft SEIS* identified cleanup actions for various areas in or near the Whatcom Waterway, including the ASB, Outer Whatcom Waterway, Inner Whatcom Waterway, Bellingham Bay Shipping Terminal and Log Pond. A summary of the relevant cleanup actions for these areas, as identified in the *Whatcom Waterway SEIS*, is provided below (refer to Section 3.5, **Environmental Health** in Chapter 3 of the Draft EIS for more information on the cleanup process in relation to New Whatcom Redevelopment Project). Final decisions on specific cleanup actions were made by Ecology as part of the final Consent Decree and Cleanup Action Plan issued in September 2007.

Aerated Stabilization Basin (ASB)

The alternatives identified by Ecology in the Whatcom Waterway SEIS as preferred under the RI/FS (Alternative 5 and 6 of the SEIS) describe cleanup activities considering potential development of a marina in the ASB. Prior to development of the marina, ASB cleanup would be accomplished through a five-step process. 1) The water level in the ASB will be lowered and the connection between the ASB and the existing outfall to the Bay will be plugged. 2) The water treatment equipment in the ASB (aerators, weirs, etc) will be removed and the height of the berm around the ASB will be lowered. 3) The ASB sludge will be removed by dredging; the dredged sludge will be treated and removed for upland disposal in an approved location. 4) The remaining water in the ASB will be pumped out, treated to remove suspended and dissolved contaminants, and the treated water will be discharged to the sanitary sewer system. 5) The residual solids within the dewatered ASB will be removed, the ASB will be filled to the appropriate elevation with water from Bellingham Bay, and the berm will be opened to the Bay. This remedial action under MTCA, including the opening of the ASB basin to Bellingham Bay and resulting increase in marine habitat, would not occur without construction and operation of a marina defined as a component of the public purpose and need for both the remedial action and other required state and federal permits (see discussion of the planned marina in **Section 2.6** of this Chapter). Clean material excavated from the existing breakwater will be used to reshape and extend the breakwater near the entrance to the future marina to reduce wave actions in the marina, and clean sediments will be dredged from the cleaned ASB basin. The majority of the excess clean material removed from the ASB breakwater, as it is reconfigured for marina use would be beneficially reused in the Inner Whatcom Waterway as material for environmental caps and to provide in-water habitat.

Outer Whatcom Waterway – Bellingham Shipping Terminal

Buried contaminated sediments in the Outer Whatcom Waterway next to the Bellingham Shipping Terminal (BST) will be removed by dredging to meet sediment cleanup objectives defined in the Whatcom Waterway Site Cleanup Action Plan and to achieve authorized navigation depths in that portion of the federal channel. The depth of dredge cuts would be to the interface with clean native sediments. Sediments removed during this dredging would be barged to an off loading facility within Port-owned property, and would be transferred for transport to an appropriately-permitted offsite disposal facility. Mechanical dredging methods would likely be used in the Outer Whatcom Waterway area. Placement of a sediment cap may be required in isolated areas of the Outer Waterway.

Inner Whatcom Waterway – Multi-Purpose Channel

Buried contaminated sediments in the Inner Whatcom Waterway will be partially removed by dredging. Removed sediments will be disposed of at a permitted upland facility. Remaining contaminated sediments (principally those buried deepest within the waterway) will be contained in-place (capped). The sides of the waterway will be capped, with waterway sideslopes engineered to enhance slope stability and preserve nearshore aquatic habitat. An area of nearshore habitat located at the head of the waterway will be preserved.

The cleanup of the Inner Whatcom Waterway described above is consistent with proposed changes in land use, including the Port's request for deauthorization of the federal channel within the Inner Waterway (see discussion in **Section 2.2.1** above). The design concept for the majority of the Inner Whatcom Waterway is for effective water depths of between 18 feet and 22

feet. It is assumed that the emergent tideflats at the head of the waterway will be preserved, and shallow-water habitat areas along the sides of the waterway will be preserved and enhanced. The central portion of the waterway will be dredged to depths 5 feet below the planned effective water depth. A sediment cap will then be applied over any residual sediments, with the cap grading range from a minimum thickness of 3 feet to a maximum thickness of 6 feet in areas near the Log Pond and Bellingham Shipping Terminal. Shoreline slopes would be stabilized using appropriate side-slopes and materials.

Bellingham Shipping Terminal – Barge Docks

The area south of the barge docks at the Bellingham Shipping Terminal (BST) will be remediated using a deep-water sub-aqueous cap. Final water depths in this area will be greater than -18 feet mean low low water (MLLW) in most areas, consistent with shoreline infrastructure and navigation uses historically conducted at the BST. The cap will be constructed of coarse granular materials and will be designed to resist potential prop-wash erosion effects. The remaining portions of this area will comply with site-specific cleanup goals. No sediment capping or dredging is proposed for these areas; these areas will be monitored to document the continued effectiveness of natural recovery at complying with cleanup levels.

Log Pond

The Log Pond area was previously remediated as part of an Interim Action implemented in 2000 by Georgia-Pacific under an Agreed Order with Ecology. Subsequent monitoring has demonstrated the effectiveness of the cleanup (including use of a subaqueous cap) and habitat enhancement actions completed as part of that project. Further actions in this area will be limited to wave attenuation features and enhancements to the shoreline edges of the cap, to ensure long-term stability of the cap edges.

2.4 APPLICANT'S OBJECTIVES

The Port's objectives for the New Whatcom Redevelopment Project are based on the past and ongoing master planning process and analysis of: site and site area conditions; environmental, land use, economic and market considerations; and future redevelopment opportunities. The public planning process, highlighted in **Section 2.2.1** above, led to a set of guiding principles and implementation strategies which are used, together with other relevant documents, as background for the Port's objectives identified below.

For purposes of SEPA (WAC 197-11-440), the following are the Port's objectives:

1. Redevelop the industrial site into a mixed use, waterfront neighborhood providing opportunities for a range of uses and activities. Create a vibrant area that integrates water-dependent uses and open space with new office, retail, services, institutional, and residential uses, and enhances the economy and livability of the area.
2. Connect the New Whatcom Redevelopment project with surrounding neighborhoods including the Central Business District by: ensuring that the redevelopment is compatible with adjacent areas; encouraging uses that complement, not replace, neighboring uses; and integrating new roadway, pedestrian access and trails with surrounding systems.

3. Provide community benefits through the phased construction of public open spaces and beaches, pedestrian trails, and moorage for small vessels that fit within the overall intent of the redevelopment plan.

4. Identify opportunities to restore, enhance and create habitat along the waterfront environment within the context of creating an economically-viable redevelopment.

5. Ensure that redevelopment is compatible with environmental remediation efforts.

6. Enhance the region's economic vitality by creating conditions that are attractive to a range of employment opportunities and businesses, including water-related industries, research and development ventures, goods and service establishments, and educational and cultural facilities.

7. In conjunction with the City of Bellingham, construct an integrated and economically-responsible infrastructure network and public amenities that adequately support phased, long-term redevelopment of the site and stimulate private investment in the project. The ability to provide the infrastructure and public amenity system should be derived from grants and the sale or lease of redevelopment parcels by the Port and from grants, bond financing and tax revenues by the City and other applicable fees and service charges. These sources of capital will be used to offset the initial and ongoing investment in infrastructure and amenities to minimize subsidy from the general tax base of the Port or City.

8. Increase public access to the waterfront by developing pedestrian, bicycle and vehicular connections to/from the site and an interconnected system of trails, viewpoints, walkways, streets, parking and boat moorage facilities. Encourage use of non-motorized transportation modes.

9. Work with non-profit organizations and developers to provide opportunities for a mix of housing products affordable to a range of employees on the site and in the community.

10. Work cooperatively with the City of Bellingham and the public to adopt a Master Development Plan and Development Agreement that provide the necessary predictability, consistency and expediency for long-term success of the redevelopment, and allow for flexibility to respond to market factors over time.

11. Encourage sustainable and "green" development practices as part of future building and infrastructure design and construction at the site.

12. Incorporate features into the planned marina to complement future mixed-use redevelopment, including: boat slip configurations, public walkways/small parks around the perimeter of the marina, and enhanced habitat opportunities.

13. Continue to coordinate with state, federal and local agencies, tribes, organizations, institutions, the public and the private sector to facilitate redevelopment planning and implementation that is successful and an asset to the community.

2.5 SITE DESCRIPTION

As described in **Section 2.1**, the New Whatcom site includes approximately 216.3 acres of contiguous waterfront property and adjacent aquatic area in central Bellingham (see Vicinity Map**, Figure 2-1**). The site lies within the City of Bellingham's Central Business District

Neighborhood Planning area. The site is generally bounded by Bellingham Bay to the west, Roeder Avenue and State Street to the east and the BNSF railroad and bluff to the south.

2.5.1 Site History

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. In 1853, a sawmill was constructed at the mouth of Whatcom Creek and was quickly followed by other development such as small mills, buildings and piers. During this same time period, coal mining operations began in the vicinity and regular shipments of coal left Bellingham Bay for San Francisco. 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 tideflats 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.

From 1888 to 1946, a 12-acre parcel on the southern portion of the New Whatcom waterfront (generally representing the current New Whatcom site Redevelopment Area 10) was used for sawmill operations, including log storage and wood disposal. From 1946 to 1965, the site was used by various owners as a landfill for waste disposal and became known as the Cornwall Avenue Landfill. Landfill operations ended at the site in 1965.

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 the 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 sold its waterfront property and aerated stabilization basin to the Port of Bellingham in 2005. In late 2007, Georgia-Pacific announced the intent to cease onsite operations by the end of 2007.

2.5.2 Existing Conditions

The New Whatcom site is primarily developed in buildings, paved area and bulkhead/wharf (along the majority of the shoreline area) reflective of the site's history as an industrial operation and shipping and maritime industrial center on Bellingham Bay.

Public pedestrian and vehicular access to the site is limited due to the operations of the Georgia-Pacific Tissue Mill, the existing BNSF right-of-way and other marine- related industrial uses.

The only known formal and informal recreational use of the site occurs at the west end of Cornwall Avenue where a small pocket beach is located; this area is frequently used as a kayak launch point. To the south of this location, and adjacent to the site, is the South Bay Trail that follows the shoreline and connects the Fairhaven District with downtown Bellingham.

Public vehicular access to the site is limited to Cornwall Avenue and Roeder Avenue on the south side of the Whatcom Creek Waterway. On the north side of the Waterway, Hilton Street and C Street serve as vehicular and truck access points to the site.

Currently, the Port owns and/or manages approximately 148.9 acres on the site; the City owns approximately 21.2 acres and another approximately 46.2 acres of the site are owned by the State of Washington (managed by DNR) or held in private ownership. (For environmental review and overall master planning purposes, the inclusion of private properties in the New Whatcom site has been assumed. Any decision regarding future redevelopment of these private properties would ultimately be made by the owners.) See Land Ownership Map, **Figure 2-3**, for an illustration of the distribution of land ownership on the site.

Approximately 36 buildings will exist onsite (see **Figure 2-4**, Existing Conditions with Building Numbers) totaling 1,155,058 sq. ft. subsequent to planned additional demolition by Georgia-Pacific. As part of the Purchase and Sale Agreement executed in January 2005 between Georgia-Pacific and the Port, Georgia-Pacific agreed to demolish certain existing buildings (subject to applicable permits) before vacating the property. For purposes of this Draft EIS, "Existing Conditions" are assumed to include only those structures scheduled to remain on the site after the completion of the Georgia-Pacific Demolition Plan; for example, the tissue warehouse building in Area 1 would be retained. This "Existing Conditions" scenario and the building numbers identified on **Figure 2-4** are reflected in the redevelopment area descriptions provided below.

Given the ongoing termination of Georgia-Pacific's operations at the site, the New Whatcom site could be considered to be in transition. This transition is expected to continue as Georgia-Pacific vacates and demolishes certain buildings over the short-term.

For descriptive purposes, the site has been divided into the following 10 redevelopment areas, as illustrated in **Figure 2-4** and described in **Table 2-1**. These redevelopment areas should not be considered definitive redevelopment parcels and the boundaries between such areas are illustrated herein for ease of understanding and evaluation only. Future phasing and subdivision of the property, and establishment of redevelopment parcels, would likely differ from these boundaries and would ultimately be dependent on sale and lease decisions by the Port (and other property owners), as well as based on specific development projects.

Redevelopment Area 1

This 51.4-acre area in bordered by the Whatcom Waterway on the south, Roeder Avenue on the east, I & J Waterway on the north and the ASB and Bellingham Bay to the west. The majority of the edge of this area adjacent to the waterways and Bay is in structural bulkhead and wharf. This area contains 12 buildings, totaling approximately 370,858 sq. ft. The Port owns 34.0 acres of the redevelopment area including the Georgia-Pacific tissue warehouse and regional distribution center (Building 11) and other light industrial buildings (Buildings B and 10). The City owns10.0 acres (including 5.0 acres of right-of-way) and two buildings (Buildings 9A and 9B) which are currently used for concrete services and light industrial purposes. The remainder of Redevelopment Area 1 is held in private ownership including parcels owned by Ebenal (Buildings 2, 2A, 3 and 4), Sanitary Service Company (Buildings 14A, 14B) and Puget Sound Energy (Building 12). Light industrial uses in the Colony Wharf area currently include several small marine-oriented businesses including boat repair, boat sales and other maritime uses. Portions of both Hilton Avenue and C Street run westward from Roeder Street through this redevelopment area. An abandoned spur or siding track runs onto the northern portion of the site near Hilton Avenue. Approximately 9.1 acres of undeveloped gravel area is located in the northwest portion of this redevelopment area.

Table 2-1
ACREAGE AND OWNERSHIP OF NEW WHATCOM REDEVELOPMENT AREAS

	Ownership (in acres)			
Redevelopment Area	**Port**	**City**	**Other[1]**	**Total**
1	34.0	10.0	7.4	51.4
2	19.8	2.0	0.8	22.6
3	7.7			7.7
4	11.4			11.4
5	6.6	0.8		7.4
6		1.0	5.5	6.5
7	5.0	3.2	1.3	9.5
8	24.2	0.1	0.1	24.4
9	5.1	0.7	15.5	21.3
10	3.4	3.4	11.4	18.2
TOTAL	117.2	21.2	42.0	180.4
ASB	31.7		4.2	35.9
TOTAL W/ASB	148.9	21.2	46.2	216.3

Source: CollinsWoerman, 2007.

[1] Property owners included in the "Other" category include: BNSF, State of Washington, Ebenal, PSE, and the Sanitary Service Company.

Redevelopment Area 2

This 22.6-acre area is bordered by the Whatcom Waterway to the north, W. Chestnut Street to the east and south and other New Whatcom site area to the west. The northern portion of this redevelopment area, adjacent to the Whatcom Waterway, is in bulkhead and wharf. The Port owns the majority of the area (approximately 19.8 acres). This area contains six buildings, totaling approximately 236,809 sq. ft. that were purchased by the Port from Georgia-Pacific in 2005. These buildings include the Granary Building (Building 7), the Pulp Screen Room

(Building 14), the Beach Plant (Building 15), the Pulp Warehouse/Electric Shop (Building 37), High Density Pulp Storage (Building 49) and the Effluent Clarifier (Building 51). Georgia-Pacific currently operates limited tissue paper production activities onsite through an agreement with the Port and has announced the intent to terminate mill operations by the end of 2007. A portion of the site, 0.8 acres, is held in private ownership. The City owns a 2.0 acre right-of-way in this area. A portion of the Burlington Northern Santa Fe (BNSF) railroad corridor runs along the eastern and southern portion of the area. Redevelopment Area 2 is primarily in building and pavement area, with approximately 0.2 acres of landscaping.

Redevelopment Area 3

This 7.7-acre area is bordered by Whatcom Waterway to the north, BNSF railroad corridor on the south, and other New Whatcom site area to the east and west. This area is owned by the Port and includes two structures totaling 107,800 sq. ft. that were formerly used as part of the Georgia-Pacific tissue mill operations on the site: the Digester Building (Building 13) and the Alcohol Plant Building (Building 17). These buildings are currently vacant. The northern portion of this redevelopment area, adjacent to the Whatcom Waterway, is in bulkhead and wharf, and the remainder of this area is in building and pavement area.

Redevelopment Area 4

This 11.4-acre area is bordered by the Whatcom Waterway to the north (including the former log pond area) and other New Whatcom site area to the east, west and south. This area is owned by the Port and includes three structures totaling 107,200 sq. ft. that were formerly used as part of the Georgia-Pacific tissue mill operations on the site: the Board Mill Building (Building 12A), the Barking and Chipping Building (Building 8) and the Chip Bins Building (Building 9). All of these buildings are currently vacant. The northern portion of this redevelopment area, adjacent to the Whatcom Waterway, is in bulkhead and wharf, and the remainder of this area is in building and pavement area. A portion of the BNSF railroad corridor runs adjacent to the western boundary of this redevelopment area.

Redevelopment Area 5

This 7.4-acre area is bordered by BNSF railroad corridor to the north, W Chestnut Street to the east, Cornwall Avenue to the south and other New Whatcom site area to the west. The Port owns 6.6 acres and the two existing structures on this area. One vacated 51,870 sq. ft. structure, the Light Powder Building (Building 19), was formerly used by Georgia-Pacific. The second building, located at 921 Cornwall (Building 50), is currently utilized as an office building by the Port. Cornwall Avenue runs along the southern boundary of this area. The City also owns a 0.8 acre right-of-way in this area. This redevelopment area is primarily in hardscape consisting of building area and pavement.

Redevelopment Area 6

This 6.5-acre area is bordered by BNSF railroad corridor to the north, Cornwall Avenue to the south and other New Whatcom site area to the east and west. This redevelopment area is owned by Puget Sound Energy (PSE) except for a 1.0 acre right-of-way owned by the City. PSE currently owns and operates the 60,356 sq. ft. Encogen facility power plant in this redevelopment area. This redevelopment area is primarily in hardscape consisting of the

Encogen plant and associated paving. Refer to Section 2.6**, Description of Improvement & Enhancement Features**, for additional information on the Encogen facility.

Redevelopment Area 7

This 9.5-acre redevelopment area is bordered by the bluff and BNSF railroad spur to the north, bluff area to the south and west, and other New Whatcom site area to the west. The Port owns 5.0 acres of this site area which includes a 48,000 sq. ft. warehouse (Building 18) located at 800 Cornwall. BNSF owns 1.3 acres utilized as railroad corridor. The City owns 3.2 acres of right-of-way. This area is entirely in hardscape surface.

Redevelopment Area 8

This 24.4-acre area is bounded by Whatcom Waterway to the north, the BNSF railroad corridor to the south, and other New Whatcom site area to the east and west. This redevelopment area, which is primarily in Port ownership (24.2 acres), contains no structures. The City owns 0.1 acres of right-of-way. BNSF owns 0.1 acres utilized as railroad right-of-way. The northern portion of this redevelopment area, adjacent to the Whatcom Waterway, is in bulkhead and wharf; a small beach area is located along a portion of this area, below the bulkhead/wharf. This redevelopment area is primarily in paved area.

Redevelopment Area 9

This 21.3-acre area is bordered by Bellingham Bay on the west, north and a portion of the east, with other New Whatcom site area to the south. The majority of the edge of this area adjacent to the Bay is in bulkhead and wharf. This area contains four structures totaling 105,216 sq. ft. The State of Washington (managed by DNR) currently owns approximately 15.5 acres of this site, with management of this land by the Port; under a Port Management Agreement. The Bellingham Shipping Terminal, which is located in the northern portion of this area adjacent to Bellingham Bay, is currently operated by the Port of Bellingham; the Shipping Terminal is used by the Port for large ship docking and loading/unloading activities. The Port owns 5.1 acres of this redevelopment area and all four onsite structures including the Shipping Terminal Warehouse #1 and #2 (Buildings I and J), the Port of Bellingham Office Building (Building G), and the Port of Bellingham Maintenance Building (Building H). A portion of the BNSF railroad corridor runs through this redevelopment area. Cornwall Avenue runs along the southern boundary of this redevelopment area. The City owns a 0.7 acre right-of-way along Cornwall Avenue.

Redevelopment Area 10

This 18.2-acre area includes five structures totaling 61,149 sq. ft. Douglas Management Co. owns 11.4 acres of this area and five structures (E1, E2, E3, E4, E5) which were formerly the site of an industrial wood treatment facility. The State of Washington (managed by DNR) owns approximately 3.4 acres of this area. The Port and City own 6.8 acres in undivided interest in this area which is the location of the former Cornwall Avenue Landfill. A small pocket beach located near the terminus of Cornwall Avenue is used as an informal recreational area.

Aerated Stabilization Basin

The 35.9-acre Aerated Stabilization Basin (ASB) is largely owned by the Port with some small portions owned by the State of Washington (managed by DNR). The ASB area has historically been used as a discharge facility for wastewater associated with heavy industrial operations at the Georgia-Pacific tissue mill, and currently receives and treats process water from the Georgia-Pacific Mill and PSE Encogen facility (see Section 2.6, **Ongoing Uses and Planned Improvements**, for additional information on the ASB). Discharge of process water and stormwater to the ASB will be terminated prior to cleanup and redevelopment of the ASB.

Existing Stormwater Control System(s)

Stormwater runoff from certain portions of the site is collected though a series of ditches, culverts, and underground pipes, and discharged through one of nine onsite outfalls to Bellingham Bay (two additional outfalls in Area 1 convey runoff from private stormwater systems). Three existing onsite outfalls have been identified that discharge runoff from offsite areas through the site without combining with onsite runoff. It is assumed that this offsite runoff would continue to be conveyed through the site and discharged after redevelopment.

Stormwater runoff from the Georgia-Pacific operations area (Redevelopment Areas 2, 3, 4, 5, and 8) is collected and combined with Georgia-Pacific's and Encogen's industrial wastewater and is pumped through pipes under the Whatcom Waterway to the ASB for water quality treatment before being discharged from a 60-inch diameter pipe 8,000 feet into Bellingham Bay. Industrial wastewater and stormwater discharges to the ASB will be terminated prior to remediation and redevelopment of the ASB. Stormwater from Area 10 is not currently routed to an outfall structure. Runoff is assumed to sheet flow into the Bay. (See Section 3.3, **Water Resources** for more details.)

Railroad Right-of-Way

An approximately 6.9 acre railroad corridor traverses the project site. See **Figure 2-4,** Existing Conditions**,** for the current railroad configuration. BNSF owns 2.2 acres of the onsite corridor. The Port owns the remainder of the corridor and provides an easement on the property to BNSF. The railroad corridor bisects the site, crossing through Redevelopment Areas 2, 3, 4, 5, 7, 8 and 9. Redevelopment Areas 1 and 10 also include Port-owned rail siding lines that are no longer in use. Currently, the railroad corridor is used by both BNSF freight trains and Amtrak passenger service (see Section 2.8, **Description of Alternatives**, for additional detail on assumptions related to the railroad corridor).

2.6 ONGOING USES AND PLANNED IMPROVEMENTS

There are a number of features/uses located on the New Whatcom site that would continue in operation or be improved/developed in the future regardless of whether the New Whatcom Master Development Plan is approved or implemented. These elements are summarized below; additional discussion on these elements is provided in Section 2.8, **Description of Alternatives**, and Section 2.9, **Separate Actions/Background Projects**. For purposes of this EIS, projects are defined as either a part of Proposed Actions (Alternatives 1-3), the No Action Alternative or Separate Actions/Background Projects.

- The Proposed Actions reflect redevelopment actions assumed under the proposed amendments to the Port's Comprehensive Scheme of Harbor Improvements, The Master Development Plan and/or Development Agreement between the Port and the City for mixed-use redevelopment of the New Whatcom site, as described in Alternatives 1 through 3.

- No Action (as described under Alternative 4) assumes the Proposed Actions are not approved and the site remains in its industrial zoning classification; the No Action Alternative assumes that some level of future redevelopment would occur on the site consistent with current industrial zoning.

- Separate Actions/Background Projects include projects known to be planned or proposed on the site or in the immediate site area that would occur independent of New Whatcom redevelopment.

A table summarizing the relationship between the site features described below, and the EIS Alternatives and Separate Actions/Background Projects analyzed in this Draft EIS, is provided at the end of this section.

Marina

Based on years of planning and environmental study focused on cleaning up the ASB for potential use as a marina, including a moorage demand study, marina siting analysis, amendments to the Port's Comprehensive Scheme of Harbor Improvements, remedial investigation/feasibility studies and other public documentation, a marina is planned to be developed by the Port of Bellingham within the remediated ASB, independent of redevelopment of the New Whatcom site. Thus, development of a marina and associated boat launch and boat haul-out facilities consistent with existing industrial zoning (Marina Concept B) is assumed as an element of the No Action Alternative (See **Section 2.8.4** of this Chapter). Inclusion of the Marina Concept B as an element of the No Action Alternative is consistent with SEPA guidance which indicates that the No Action Alternative should describe what is likely to occur on the site if the Proposed Actions are not approved, and in this case, the site remains under industrial zoning. As indicated, it is assumed that Marina Concept B would be developed within the ASB if site redevelopment to mixed uses is not approved and implemented. It is intended that full environmental review of the probable significant impacts of Marina Concept B is included in this EIS.

Under the Proposed Actions, the specific configuration of the marina within the remediated ASB would reflect a somewhat different layout and would incorporate additional features to complement mixed-use redevelopment of the site (Marina Concept A). Marina Concept A is included in Redevelopment Alternatives 1 through 3. In general, Concept A would differ from Concept B by providing fewer boat slips, new and enhanced public access and parks around the perimeter of the marina, and additional in-water habitat features. It is also intended that full environmental review of Marina Concept A is included in this EIS; further, it is assumed that Marina Concept A would be designated as a Planned Action project in the City's Planned Action Ordinance regarding New Whatcom redevelopment (see Section 2.10 for more information on the Planned Action process). Also refer to Section 2.8.2**, Description of Features Common to Alternatives 1 though 3 (Redevelopment Alternatives)** and Section 2.8.4**, No Action Alternative**, for additional information on Marina Concepts A and B. See **Chapter 3** of this

Draft EIS for more details on potential impacts from Marina Concepts A and B under various environmental elements.

It should be noted that the Port has submitted a complete Shoreline Substantial Development Permit application to the City of Bellingham for the marina and associated facilities. The marina concept identified in that application is generally consistent with Marina Concept A. Since the City has not completed its update to the Shoreline Master Program, the permit application is subject to existing regulations in place at the time of a complete application, including existing shoreline regulations (see Section 3.8, **Relationship to Plans and Policies** for a discussion of the marina relative to the existing SMP and regulations). If the Proposed Actions are not approved, the Port could withdraw its current marina application and substitute it with a concept that is consistent with Marina Concept B in the future. Therefore, both concepts representing a range of potential marina development are identified and evaluated in this Draft EIS.

Bellingham Shipping Terminal (BST)

The Port of Bellingham currently provides docking, unloading and service operations at the Shipping Terminal located in the northwestern portion of Area 9. The Port of Bellingham anticipates continuation of current operations at the Shipping Terminal with or without redevelopment under the Proposed Actions. To accommodate continued operations, the Port of Bellingham anticipates that periodic maintenance and limited in-water/over-water improvements will be required in the future. These minor improvements, which are analyzed in this Draft EIS as elements of the No Action Alternative (Alternative 4), are categorized in this document as North Pier improvements and South End improvements. Refer to **Section 2.8.4** of this Chapter for a description of those features analyzed under the No Action Alternative.

Two new deep water piers, contemplated by the Port of Bellingham to accommodate future potential users, such as the National Oceanic and Atmospheric Administration (NOAA) vessels, are identified as Separate Actions/Background Projects. Refer to **Section 2.9** of this Chapter for a description of those features analyzed as separate/background projects.

Puget Sound Energy Encogen Facility

Puget Sound Energy (PSE) currently operates the Encogen facility (Encogen), a natural gas-fired cogeneration plant, which is located within Area 6 of the New Whatcom site at 915 Cornwall Avenue. Encogen burns natural gas to produce electricity which is supplied to the Puget Sound Energy electrical grid. A portion of the waste steam and hot water is sold to Georgia-Pacific for use in industrial operations. The Encogen facility discharges warm effluent water and process water to the ASB for treatment via a single pipe under the Whatcom Waterway; following treatment and cooling to achieve permit requirements, this discharge water is then conveyed from the ASB through an outfall into deeper water in Bellingham Bay. Discharge to the ASB will be terminated prior to cleanup and redevelopment of the ASB. Therefore, it is assumed that the cogeneration plant will be operated as a peak power generation facility after that point, and that PSE will design, conduct separate environmental review and obtain the necessary permits for alternate cooling and wastewater discharge facilities for its process water (i.e. connect to the City's sanitary sewer system).

The Redevelopment Alternatives (Alternatives 1 through 3) assume that the PSE Encogen facility will remain in operation through the year 2016, and will then relocate or abandon its operations by 2026. This portion of the site would be available for redevelopment by 2026.

The No Action Alternative assumes that the Encogen facility remains in operation through 2026.

Burlington Northern Santa Fe Railroad (BNSF)

As described earlier in this chapter, a railroad corridor bisects the site in a reverse "s" curve configuration. In support of mixed-use redevelopment of the site, the Port and City are working with the Washington State Department of Transportation and BNSF on plans to relocate the main line to follow the eastern and southern border of the site, adjacent to the bluff.

Three of the four Redevelopment Alternatives assume that the current railroad corridor on the site will be relocated to the eastern and southern border of the site; Alternative 1 and Alternative 2 assume relocation of the railroad corridor by 2016, and Alternative 2A assumes relocation of the railroad corridor by 2026. Alternative 3 assumes that the railroad corridor remains in its current location. The railroad corridor relocation would be subject to a specific permitting and environmental review process that could be undertaken by BNSF/Washington State Department of Transportation in the future.

Summary of Ongoing Uses and Planned Improvements

Table 2-2 below summarizes how the site features described above relate to the alternatives analyzed in this EIS, as well as those elements that will be described and analyzed as Separate Actions/Background Projects.

2.7 DESCRIPTION OF PROPOSED ACTION(S)

2.7.1 Background

As described earlier in this chapter, the Port and City have been working together to formulate and implement a Master Development Plan that would, if approved, be intended to transform the New Whatcom area into a new neighborhood with residences, shops, offices, marine and light industry, institutional uses (e.g. Western Washington University), as well as parks, trails, shoreline habitat along the Bay and visitor moorage facilities. The Master Development Plan would include substantial new opportunities for public access to the waterfront that do not exist under current conditions.

For this Draft EIS, the Port has formulated a proposed redevelopment concept and a range of alternatives (Alternatives 1 through 3) that are consistent with this concept (see discussion under Section 2.8**, Description of Alternatives**, later in this Chapter). A subsequent step in the Port/City master planning process will be the definition and adoption of a Master Development Plan. This Master Development Plan will be defined based on the results of this Draft and Final EIS, ongoing economic and market analyses, prior and continued public input and other considerations. The Port and City will not make a final decision on the Master Development Plan until the EIS process is complete.

Table 2-2
SUMMARY OF ONGOING USES AND PLANNED IMPROVEMENTS

Site Feature	No Action Alternative (Alternative 4)	Redevelopment Alternatives (Alternatives 1 – 3)	Separate Actions/Background Projects
Marina	Design Concept B	Design Concept A	Not applicable.
Bellingham Shipping Terminal	Improvements would include minor changes to the existing facility (north pier and south end portions of the Terminal).	Minor improvements assumed under No Action would also apply under Alternatives 1-3.	Improvements would include major additions, such as two new piers, to accommodate large vessels (i.e. NOAA).
PSE Encogen facility	Remains in operation through 2026	Remains in operation in 2016, with relocation or abandonment by 2026; area available for redevelopment by 2026.	Not applicable
BNSF Railroad Corridor Relocation	BNSF railroad corridor is not relocated	Under Alternatives 1 and 2, the BNSF railroad corridor is assumed to be relocated by 2016. Under Alternative 2A, the railroad corridor would be relocated by 2026. The railroad corridor would not be relocated under Alternative 3.	Not applicable.

Source: Port of Bellingham and City of Bellingham, 2007

Redevelopment Concept

As indicated in the January 2005 Interlocal Agreement, "*the City and Port recognize that successful and timely redevelopment of the New Whatcom site benefits the economic and social welfare of Bellingham and Whatcom County, and represents an historic opportunity for the citizens of Bellingham and Whatcom County to shape the Bellingham waterfront for the next century*".

To capitalize on this historic opportunity, the overall proposed redevelopment concept for the New Whatcom site, as envisioned through the public planning process, including ongoing remediation plans undertaken in conjunction with Ecology, other agencies and the tribes, is to improve waterfront access, restore natural shoreline and near-shore habitat, promote a strong and dynamic waterfront economy, and reinforce the inherent qualities of the waterfront through the creation of a new neighborhood.

To provide the opportunity for the creation of a strong and dynamic waterfront economy, the redevelopment concept seeks to convert a "brownfields site" to a mix of uses, including: job creating uses, such as office, institutional and commercial; goods and services uses such as shops and restaurants; and, multifamily residential uses providing housing opportunities for a wide range of income levels. This mix of uses would create the opportunity for the establishment of a live-work-play environment. In addition, institutional uses could include an expanded

campus for Western Washington University. The redevelopment concept also supports a continued presence of maritime industrial uses on the site. To support this mix of uses, a new roadway system would be provided on the site to connect with the surrounding roadway network, as well as to provide internal access to new uses and the waterfront.

These new mixed uses would be integrated with the marina (including perimeter trail/parks and in-water habitat features), natural shoreline, parks/open space and public promenade opportunities. The provision of public parks, trails and open space, including substantial opportunities for public waterfront access, are integral components of the redevelopment concept. Accordingly, the majority of the site's waterfront would be made available to the public.

Consistent with previous planning and environmental studies focused on remediation of the ASB and potential use as a marina, the proposed redevelopment concept is to integrate the marina with mixed-use redevelopment and connect the marina with the surrounding community. For example, the concept for the marina with mixed-use redevelopment (Concept A) includes park and open space areas and a pedestrian trail around the marina perimeter, with connections to the planned onsite and regional trail system. Marina Concept A also incorporates provisions for additional in-water habitat intended to benefit the bay.

The redevelopment concept includes the consideration of low-impact design strategies. For example, the Port has been selected by the US Green Building Council to participate in the LEED Neighborhood Development Pilot Program, which seeks to integrate the principles of smart growth, urbanism and green building into the first national standard for neighborhood green design. This jointly funded initiative by the City and Port, would seek to achieve, among other things, the LEED Neighborhood Development Program guidelines for brownfield redevelopment, reduced automobile dependence, housing and jobs proximity, compact development, walkable streets, innovation and design process points for a clean ocean marina and stormwater design to minimize impervious surfaces and provide innovative water quality treatment techniques. The New Whatcom redevelopment concept also allows the opportunity for the potential adaptive reuse of existing former Georgia-Pacific buildings, particularly the brick-clad buildings in Areas 2, 3 and 4 of the site, if deemed feasible.

Parks, Open Space and Public Access Concept

As indicated in the "**Applicants Objectives**" listed earlier in this chapter, objectives for the New Whatcom Redevelopment Project include "*providing community benefits through the phased construction of public open spaces and beaches*" and "*identifying opportunities to restore, enhance and create habitat along the waterfront environment within the context of creating an economically-viable redevelopment*".

Consistent with the objectives identified above, the redevelopment concept for the site, as expressed through Alternatives 1 through 3, dedicates the majority of the site's shoreline waterfront to public access. The concept includes area reserved for public parks, open space and trails, in a variety of configurations, allowing for a wide range of passive and active uses; opportunities for recreational activities such as biking, walking, picnicking, public gathering (including opportunities for festivals, plays etc.) and viewing Bellingham Bay would be afforded. The parks and open space concept dedicates a substantial portion of the site to public parks and open space (33 acres to 15 acres would be in public parks and open space under Alternatives 1 and 3, respectively). Additional open space area would likely be provided via courtyards, gardens and landscape area associated with redevelopment.

Alternatives 1 through 3 assume a certain density and level of redevelopment, together with a range of public parks, trails and open space. As currently defined by the Port, the higher the density, the greater the level of assumed parks, trails and open spaces. As part of the ongoing master planning process and public input, the eventual Master Development Plan would likely reflect a mixing and matching of various project elements (see **Section 2.8** for further discussion of the mix and match potential).

This park and open space concept is intended to fulfill the vision of the site as a regional resource, serving the greater Bellingham community as well as the residents and employees at the site. The concept reflects the potential for the site to be a local and regional recreational destination, attracting visitors from the surrounding Bellingham area as well as from more distant areas. The parks and open space concept recognizes the public value of waterfront parks and open space by dedicating the majority of the linear shoreline to public access and amenities, as well as providing linkages to the existing (and developing) regional system of trails.

New trails on the site would provide a linkage between the Whatcom Creek Trail to the east and the South Bay Trail to the south and west, thus providing an uninterrupted trail system from the western end of the Bellingham CBD to Boulevard Park and beyond to the south and west. The new trail system on the site would also link with the Harbor Loop Trail around the Squalicum Inner Harbor to the north. Development of certain trail features including an over-water trail connection between Boulevard Park and the western end of Area 10 and a high-speed bicycle trail parallel to the bluff in Areas 7 and 10 are being planned by the City; these specific trail projects have not been planned to sufficient detail to be fully analyzed in this EIS, and are identified as separate projects. See Section 2.9, **Separate Actions/Background Projects**, for more information on these projects.

Infrastructure Concept

Roadway System

Public vehicular access to the site is currently limited due to past and current operations of Georgia-Pacific, the existing railroad right-of-way and other marine-related industrial uses on the site. Public vehicular access to the site is currently provided by Cornwall Avenue and Roeder Avenue at the southern and eastern edges of the site, respectively. North of the Whatcom Waterway, Hilton Street and C Street provide vehicular access to this portion of the site.

As indicated in the "**Applicants Objectives**" listed earlier in this chapter, objectives for the New Whatcom Redevelopment Project include "*connect the New Whatcom Redevelopment project with surrounding neighborhoods including the Central Business District by ensuring an integrated new roadway system*" and "*increase public access to the waterfront by developing vehicular connections to/from the site*." Consistent with these objectives, the Redevelopment Alternatives include concepts for the site that include various roadway connections and improvements. The roadway system concept is to extend elements of the city road grid to the New Whatcom site and waterfront, create an angled road grid south of Laurel Avenue to preserve views and solar access, as feasible, and locate street and parking as far as feasible from the shoreline while still allowing public access to the waterfront. See Section 2.8.2**, Description of Features Common to Alternatives 1 through 3 (Redevelopment Alternatives)**, for detail on the roadway improvements assumed for the Redevelopment Alternatives.

Grading

Redevelopment Alternatives 1 through 3 would require grading for construction of infrastructure components, for parking structures and to achieve suitable finish grades for building construction. For purposes of this Draft EIS, a preliminary grading concept was formulated. The concept assumes that the majority of the site would be raised via imported fill material approximately 3 to 6 feet above the existing site grade; 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 of long-term sea-level rise, and reductions in subsurface excavation work within the areas of completed site remediation. It is estimated that up to approximately 63,000 to 76,000 cubic yards (CY) of cut and up to approximately 680,000 to 700,000 CY of fill could result to implement this grading concept. Cuts could be necessary to establish new utility corridors and fill could be required to raise site grades to meet redevelopment objectives. It is assumed that all fill material would be clean, free draining structural fill. Specific grading plans for redevelopment and infrastructure projects would be formulated as part of the future design and permit process. The grading concept outlined above could be refined in the future, but likely represents a worst-case, maximum assessment of fill material needs to support redevelopment at the site. Alternatives that would lessen grading quantities could be determined as part of the design and permit process for future construction projects.

Stormwater System

While a specific stormwater system design for the New Whatcom site has not yet been established, a stormwater management plan and certain assumptions were formulated concerning the likely features and configuration of the stormwater system for purposes of analysis in this Draft EIS. The site-specific stormwater system design and layout would be established as part of the construction and redevelopment permit process. (See Section 3.3, **Water Resources**, for more information about the assumed New Whatcom stormwater system.)

The following design assumptions were used in developing the stormwater management plan for the site under all Redevelopment Alternatives (these assumptions may be reconsidered at the time of specific future site redevelopment based on design, engineering and economic factors); however, it is assumed that any potential changes in assumptions would not change conclusions regarding environmental impacts contained in this Draft EIS. Significant changes in assumptions could warrant additional environmental review in the future.

- Existing offsite conveyance pipes that pass runoff through the site to existing outfall structures would remain in operation and would be independent of the new onsite conveyance and discharge systems for runoff from onsite redevelopment.

- The long-term stormwater conveyance system for the site is assumed to be based on a gravity flow system. Pump stations may be used to support temporary systems, but ultimately pump stations would not likely be used except potentially to collect runoff from small isolated areas. Fill could be placed on the site to create a gradient that would enable a gravity flow system to the bay.

- Eight new outfalls to Bellingham Bay (or the Whatcom Waterway) would be constructed (one existing outfall would be reconstructed) to discharge runoff from the redeveloped

site. The location of new stormwater outfalls would minimize the potential for impacts to fish and habitat.

Under Alternatives 1 through 4, it is assumed that any stormwater facilities meeting the Basic Treatment criteria from the Ecology 2005 Stormwater Management Manual could be used for water quality treatment. This Draft EIS analyzed three different stormwater treatment system scenarios: (1) all stormwater treated by wet vaults, (2) all stormwater treated by bioretention, biofiltration swales or filter strips, and (3) a 50:50 mix of (1) and (2) to reflect the most probable combination of facilities that would be constructed.

As indicated above, the Port anticipates participating with the City in the LEED Neighborhood Development (LEED-ND) Pilot Program. The Port and City would work with agencies, businesses and organizations regarding potential incorporation of certain stormwater design measures to reduce impervious surfaces and provide innovative water quality treatment techniques as part of specific redevelopment projects. These could include use of permeable pavements, green roofs and bioswales.

Utilities

Water and sewer service is currently provided to the New Whatcom site by the City of Bellingham Public Works Department. Electrical service is currently provided to the site by Puget Sound Energy. Natural gas service is currently provided to the site by Cascade Natural Gas. Under all alternatives, these utilities would continue to provide service to the site but would likely require extensions or improvements to provide service to new uses. The Port and City would coordinate with utility providers to ensure adequate infrastructure is in place to serve future redevelopment.

Solid waste collection and recycling service would be provided by the Sanitary Service Company. Solid waste collection routes and operations would be expanded to serve future redevelopment at the New Whatcom site.

All utility providers expect to have adequate capacity to serve New Whatcom redevelopment (see Section 3.14, **Utilities**, for more information).

2.7.2 Proposed Actions

To implement the vision for the site derived from the public planning process, the Proposed Actions of the Port of Bellingham and City of Bellingham for the New Whatcom site include:

Proposed Actions of the Port of Bellingham

- Approval of amendments to the Port's *Comprehensive Scheme of Harbor Improvements*.

- Development of a proposal to the City of Bellingham for a Master Development Plan (MDP) for the New Whatcom Redevelopment Area.

- Approval of a Development Agreement between the Port of Bellingham and the City of Bellingham.

Proposed Actions of the City of Bellingham

- Adoption of a MDP for the New Whatcom Redevelopment Area which will be, for GMA purposes, a "Subarea Plan" and will detail the location, scale and mix of uses, infrastructure improvements, public access amenities, and phasing for each site area.

- Adoption of Development Regulations for the New Whatcom Redevelopment Area.

- Approval of a Development Agreement between the City of Bellingham and the Port of Bellingham which will identify implementing land use regulations for the site (zoning, subdivision, design standards), and will identify infrastructure requirements, phasing, and development standards for each site area within the MDP.

- Adoption of a Planned Action Ordinance.

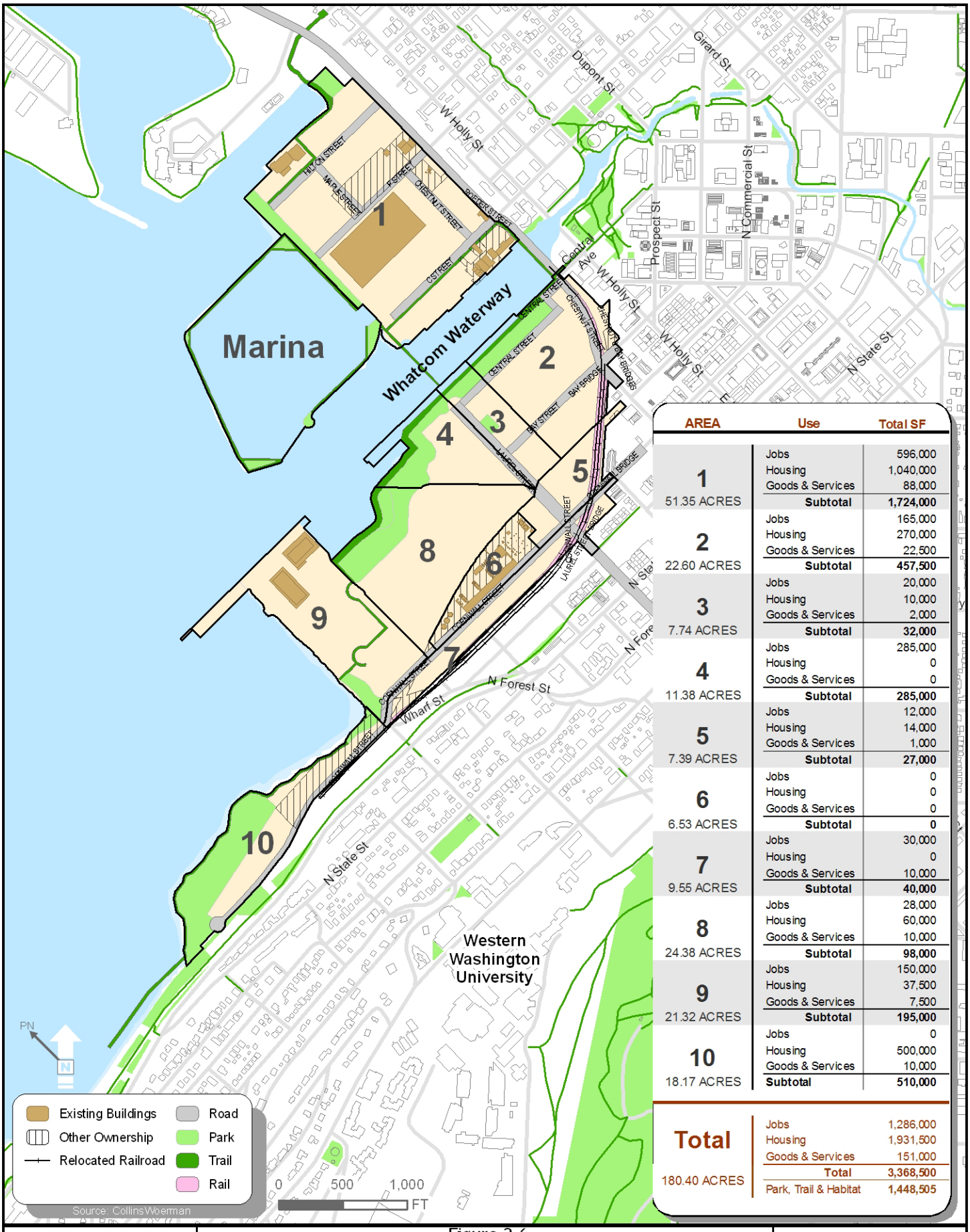
- Future permits for infrastructure improvements, construction projects, and redevelopment activities within the site over the build-out period.

2.8 DESCRIPTION OF ALTERNATIVES

At this stage of the process, a preferred Master Development Plan for the site has not been determined. Further evaluation and public input (via the EIS, ongoing master planning, and ultimately the Port's and City's decision-making processes) will lead to consideration and adoption of a Master Development Plan for New Whatcom. In order to disclose environmental information relevant to the consideration and adoption of a Master Development Plan, this EIS evaluates alternative redevelopment scenarios (EIS Alternatives).

For purposes of the environmental review, three Redevelopment Alternatives, one sub-alternative and the No Action Alternative are analyzed in the EIS. The Redevelopment Alternatives represent a full range of land use intensities and densities that the site could accommodate in light of: the Port's objectives as applicant (see **Applicants Objectives** in **Section 2.4** of this Chapter); the Port's, City's and the public's vision, goals and principles; the existing and proposed regulatory framework (Comprehensive Plan, Shoreline Master Program and other pertinent policies and regulations); and, economic and market factors. The Alternatives, including Higher Density (Alternative 1), Medium Density (Alternative 2), Medium Density with several different redevelopment assumptions (Alternative 2A), Lower Density (Alternative 3) and No Action (Alternative 4), represent the range of potential redevelopment of the New Whatcom site for analysis in the EIS; however, *none of the Alternatives should be considered a definitive plan for the New Whatcom site at this time*. The Alternatives function to provide representative levels and types of redevelopment and supporting infrastructure that could be achieved over time and that can be evaluated in the context of the EIS process. See **Figures 2-6** through **2-13** for plans illustrating redevelopment under Alternatives 1 through 3; the plan for Alternative 4 (No Action) is provided in **Section 2.8.4** of this Chapter.

Redevelopment is analyzed for two time periods: 2016, which represents an interim redevelopment stage, and 2026, which is assumed to represent build-out of the redevelopment. The actual build-out period could vary depending upon specific economic and market conditions.



AREA	Use	Total SF
1 51.35 ACRES	Jobs	596,000
	Housing	1,040,000
	Goods & Services	88,000
	Subtotal	**1,724,000**
2 22.60 ACRES	Jobs	165,000
	Housing	270,000
	Goods & Services	22,500
	Subtotal	**457,500**
3 7.74 ACRES	Jobs	20,000
	Housing	10,000
	Goods & Services	2,000
	Subtotal	**32,000**
4 11.38 ACRES	Jobs	285,000
	Housing	0
	Goods & Services	0
	Subtotal	**285,000**
5 7.39 ACRES	Jobs	12,000
	Housing	14,000
	Goods & Services	1,000
	Subtotal	**27,000**
6 6.53 ACRES	Jobs	0
	Housing	0
	Goods & Services	0
	Subtotal	**0**
7 9.55 ACRES	Jobs	30,000
	Housing	0
	Goods & Services	10,000
	Subtotal	**40,000**
8 24.38 ACRES	Jobs	28,000
	Housing	60,000
	Goods & Services	10,000
	Subtotal	**98,000**
9 21.32 ACRES	Jobs	150,000
	Housing	37,500
	Goods & Services	7,500
	Subtotal	**195,000**
10 18.17 ACRES	Jobs	0
	Housing	500,000
	Goods & Services	10,000
	Subtotal	**510,000**
Total 180.40 ACRES	Jobs	1,286,000
	Housing	1,931,500
	Goods & Services	151,000
	Total	**3,368,500**
	Park, Trail & Habitat	**1,448,505**

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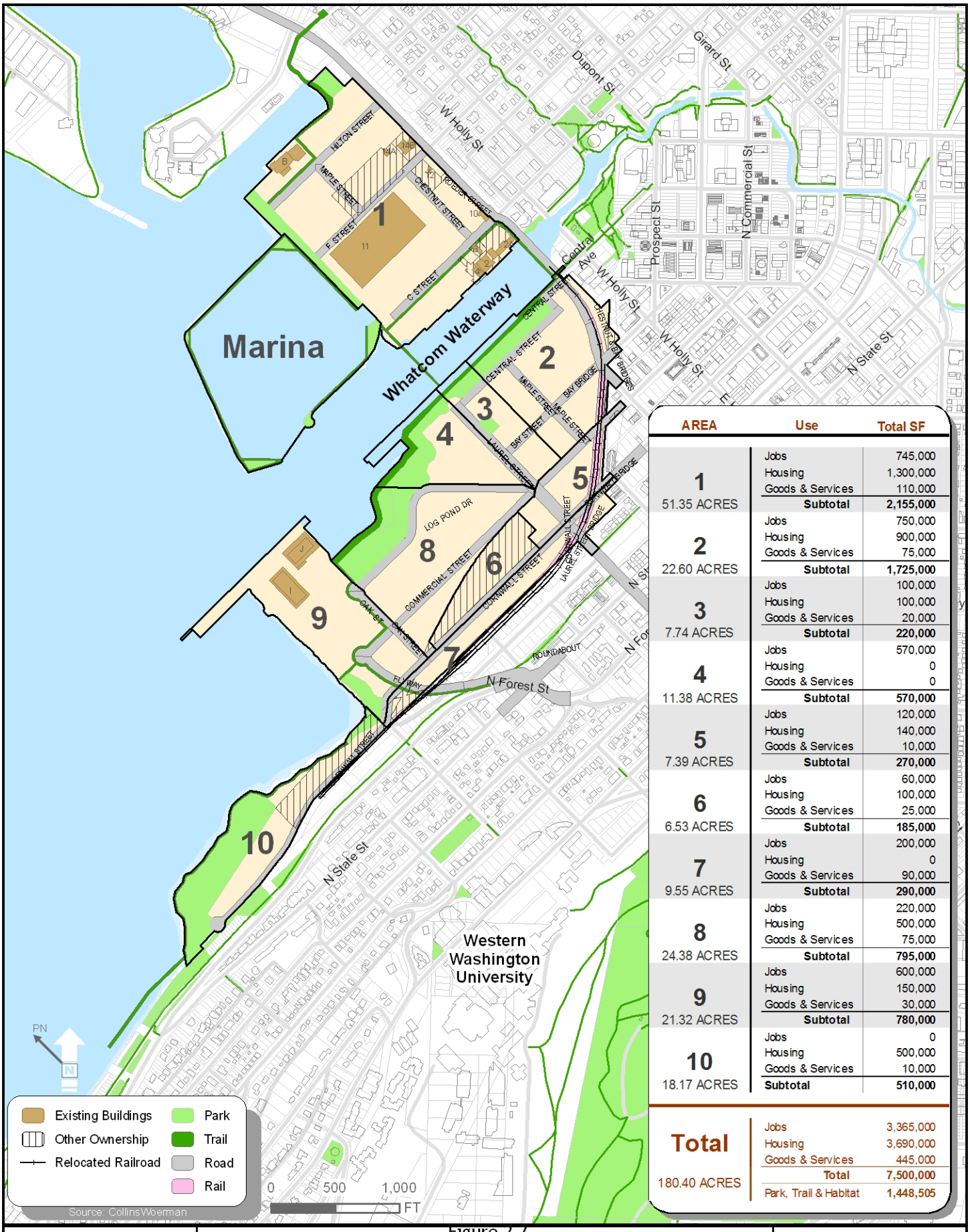
Figure 2-6
Alternative 1 - Higher Density Alternative
2016

New Whatcom Redevelopment EIS



AREA	Use	Total SF
1 51.35 ACRES	Jobs	745,000
	Housing	1,300,000
	Goods & Services	110,000
	Subtotal	**2,155,000**
2 22.60 ACRES	Jobs	750,000
	Housing	900,000
	Goods & Services	75,000
	Subtotal	**1,725,000**
3 7.74 ACRES	Jobs	100,000
	Housing	100,000
	Goods & Services	20,000
	Subtotal	**220,000**
4 11.38 ACRES	Jobs	570,000
	Housing	0
	Goods & Services	0
	Subtotal	**570,000**
5 7.39 ACRES	Jobs	120,000
	Housing	140,000
	Goods & Services	10,000
	Subtotal	**270,000**
6 6.53 ACRES	Jobs	60,000
	Housing	100,000
	Goods & Services	25,000
	Subtotal	**185,000**
7 9.55 ACRES	Jobs	200,000
	Housing	0
	Goods & Services	90,000
	Subtotal	**290,000**
8 24.38 ACRES	Jobs	220,000
	Housing	500,000
	Goods & Services	75,000
	Subtotal	**795,000**
9 21.32 ACRES	Jobs	600,000
	Housing	150,000
	Goods & Services	30,000
	Subtotal	**780,000**
10 18.17 ACRES	Jobs	0
	Housing	500,000
	Goods & Services	10,000
	Subtotal	**510,000**
Total 180.40 ACRES	Jobs	3,365,000
	Housing	3,690,000
	Goods & Services	445,000
	Total	**7,500,000**
	Park, Trail & Habitat	1,448,505

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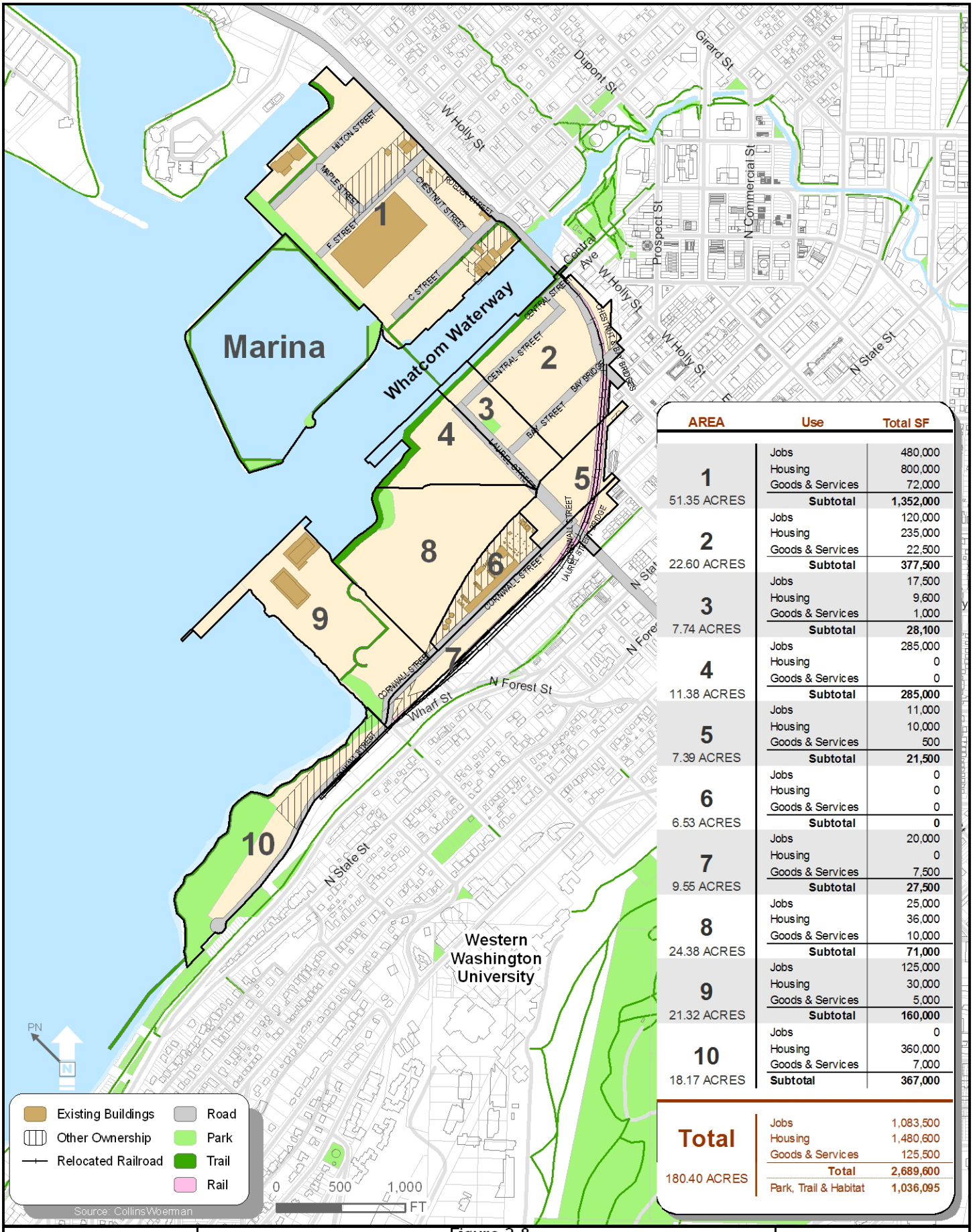
Figure 2-7
Alternative 1 - Higher Density Alternative
2026

New Whatcom Redevelopment EIS



AREA	Use	Total SF
1 — 51.35 ACRES	Jobs	480,000
	Housing	800,000
	Goods & Services	72,000
	Subtotal	**1,352,000**
2 — 22.60 ACRES	Jobs	120,000
	Housing	235,000
	Goods & Services	22,500
	Subtotal	**377,500**
3 — 7.74 ACRES	Jobs	17,500
	Housing	9,600
	Goods & Services	1,000
	Subtotal	**28,100**
4 — 11.38 ACRES	Jobs	285,000
	Housing	0
	Goods & Services	0
	Subtotal	**285,000**
5 — 7.39 ACRES	Jobs	11,000
	Housing	10,000
	Goods & Services	500
	Subtotal	**21,500**
6 — 6.53 ACRES	Jobs	0
	Housing	0
	Goods & Services	0
	Subtotal	**0**
7 — 9.55 ACRES	Jobs	20,000
	Housing	0
	Goods & Services	7,500
	Subtotal	**27,500**
8 — 24.38 ACRES	Jobs	25,000
	Housing	36,000
	Goods & Services	10,000
	Subtotal	**71,000**
9 — 21.32 ACRES	Jobs	125,000
	Housing	30,000
	Goods & Services	5,000
	Subtotal	**160,000**
10 — 18.17 ACRES	Jobs	0
	Housing	360,000
	Goods & Services	7,000
	Subtotal	**367,000**
Total — 180.40 ACRES	Jobs	1,083,500
	Housing	1,480,600
	Goods & Services	125,500
	Total	**2,689,600**
	Park, Trail & Habitat	1,036,095

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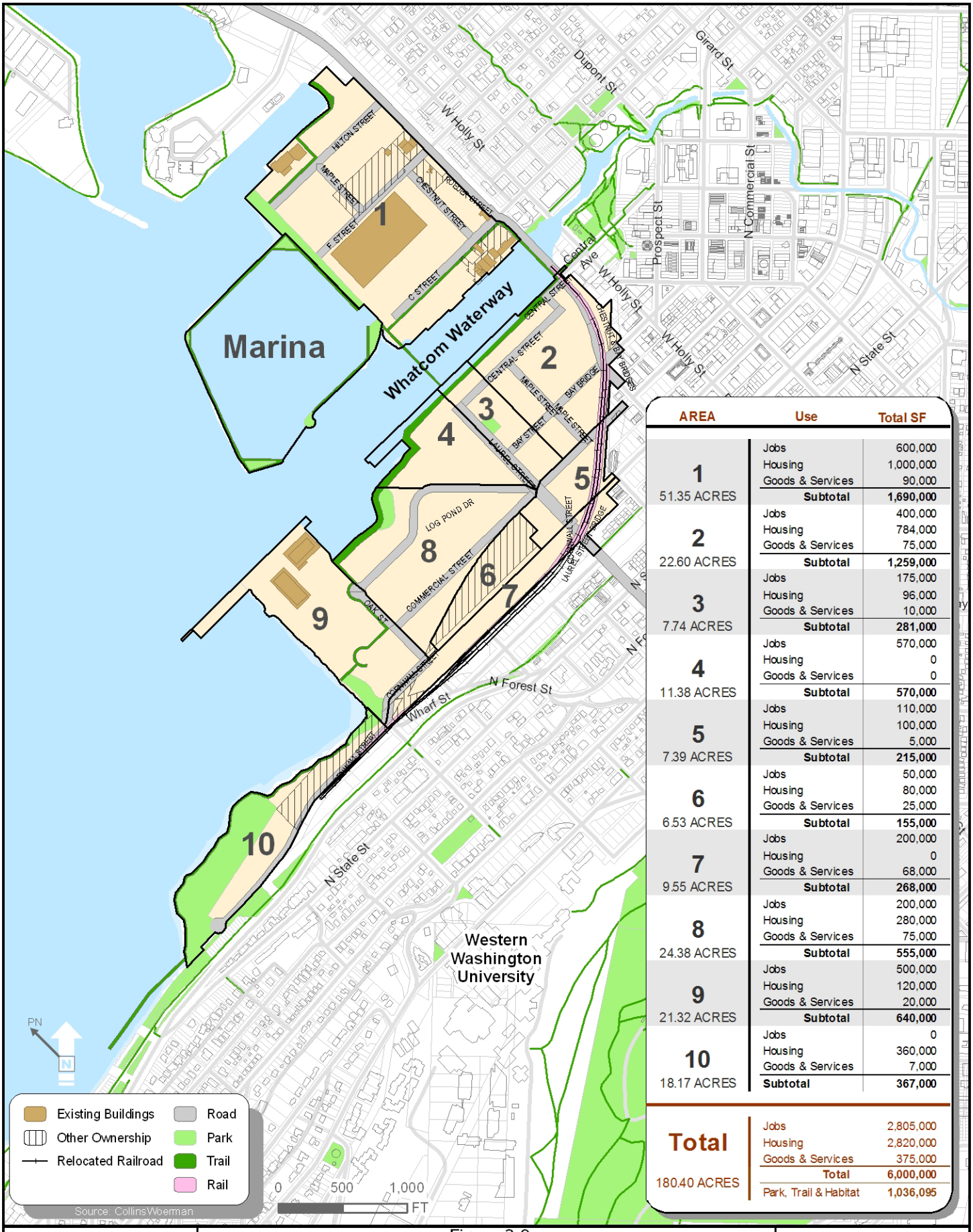
Figure 2-8
Alternative 2 - Medium Density Alternative
2016

New Whatcom Redevelopment EIS



AREA	Use	Total SF
1 51.35 ACRES	Jobs	600,000
	Housing	1,000,000
	Goods & Services	90,000
	Subtotal	**1,690,000**
2 22.60 ACRES	Jobs	400,000
	Housing	784,000
	Goods & Services	75,000
	Subtotal	**1,259,000**
3 7.74 ACRES	Jobs	175,000
	Housing	96,000
	Goods & Services	10,000
	Subtotal	**281,000**
4 11.38 ACRES	Jobs	570,000
	Housing	0
	Goods & Services	0
	Subtotal	**570,000**
5 7.39 ACRES	Jobs	110,000
	Housing	100,000
	Goods & Services	5,000
	Subtotal	**215,000**
6 6.53 ACRES	Jobs	50,000
	Housing	80,000
	Goods & Services	25,000
	Subtotal	**155,000**
7 9.55 ACRES	Jobs	200,000
	Housing	0
	Goods & Services	68,000
	Subtotal	**268,000**
8 24.38 ACRES	Jobs	200,000
	Housing	280,000
	Goods & Services	75,000
	Subtotal	**555,000**
9 21.32 ACRES	Jobs	500,000
	Housing	120,000
	Goods & Services	20,000
	Subtotal	**640,000**
10 18.17 ACRES	Jobs	0
	Housing	360,000
	Goods & Services	7,000
	Subtotal	**367,000**
Total 180.40 ACRES	Jobs	2,805,000
	Housing	2,820,000
	Goods & Services	375,000
	Total	**6,000,000**
	Park, Trail & Habitat	1,036,095

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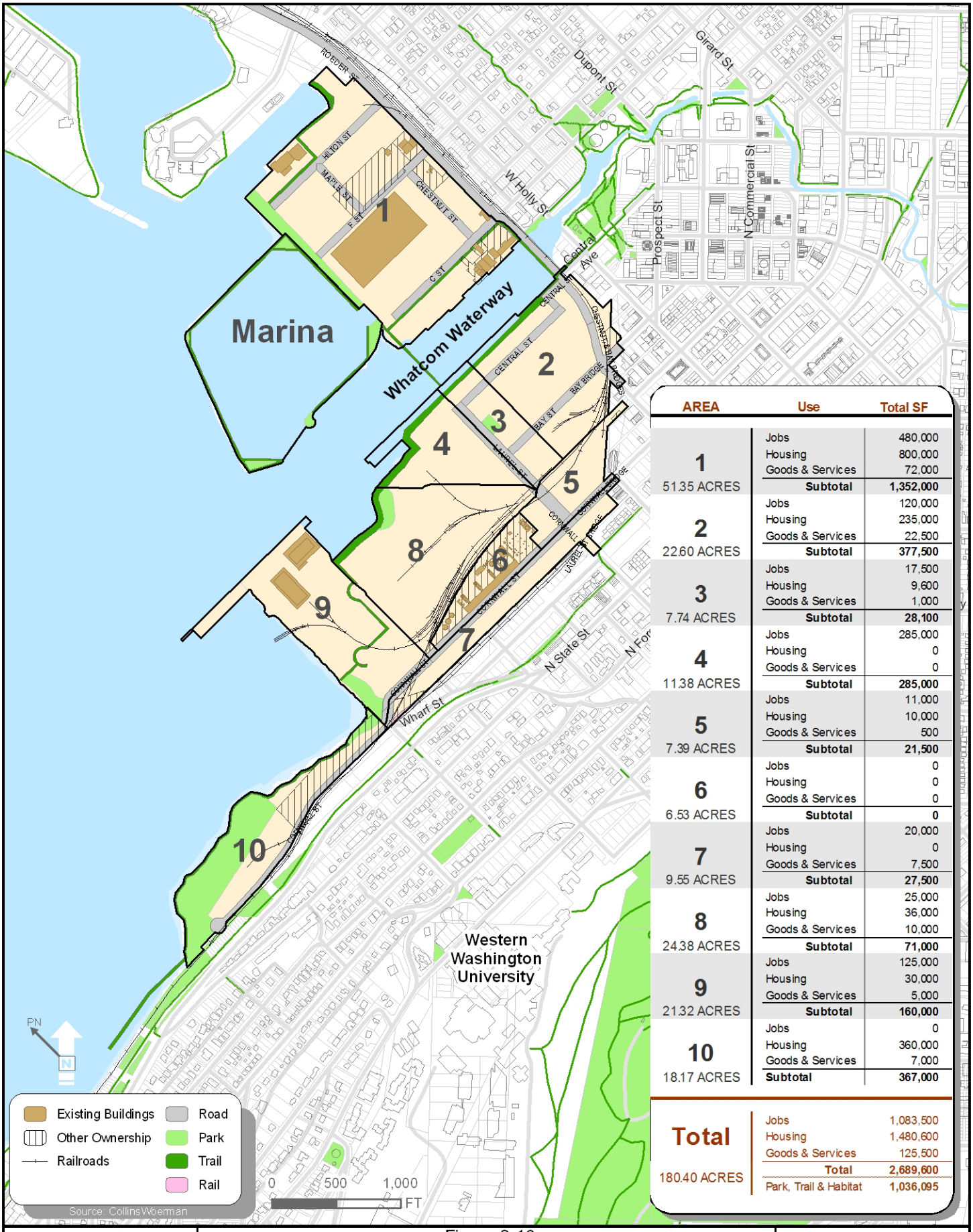
Figure 2-9
Alternative 2 - Medium Density Alternative
2026

New Whatcom Redevelopment EIS



AREA	Use	Total SF
1 51.35 ACRES	Jobs	480,000
	Housing	800,000
	Goods & Services	72,000
	Subtotal	**1,352,000**
2 22.60 ACRES	Jobs	120,000
	Housing	235,000
	Goods & Services	22,500
	Subtotal	**377,500**
3 7.74 ACRES	Jobs	17,500
	Housing	9,600
	Goods & Services	1,000
	Subtotal	**28,100**
4 11.38 ACRES	Jobs	285,000
	Housing	0
	Goods & Services	0
	Subtotal	**285,000**
5 7.39 ACRES	Jobs	11,000
	Housing	10,000
	Goods & Services	500
	Subtotal	**21,500**
6 6.53 ACRES	Jobs	0
	Housing	0
	Goods & Services	0
	Subtotal	**0**
7 9.55 ACRES	Jobs	20,000
	Housing	0
	Goods & Services	7,500
	Subtotal	**27,500**
8 24.38 ACRES	Jobs	25,000
	Housing	36,000
	Goods & Services	10,000
	Subtotal	**71,000**
9 21.32 ACRES	Jobs	125,000
	Housing	30,000
	Goods & Services	5,000
	Subtotal	**160,000**
10 18.17 ACRES	Jobs	0
	Housing	360,000
	Goods & Services	7,000
	Subtotal	**367,000**
Total 180.40 ACRES	Jobs	1,083,500
	Housing	1,480,600
	Goods & Services	125,500
	Total	**2,689,600**
	Park, Trail & Habitat	1,036,095

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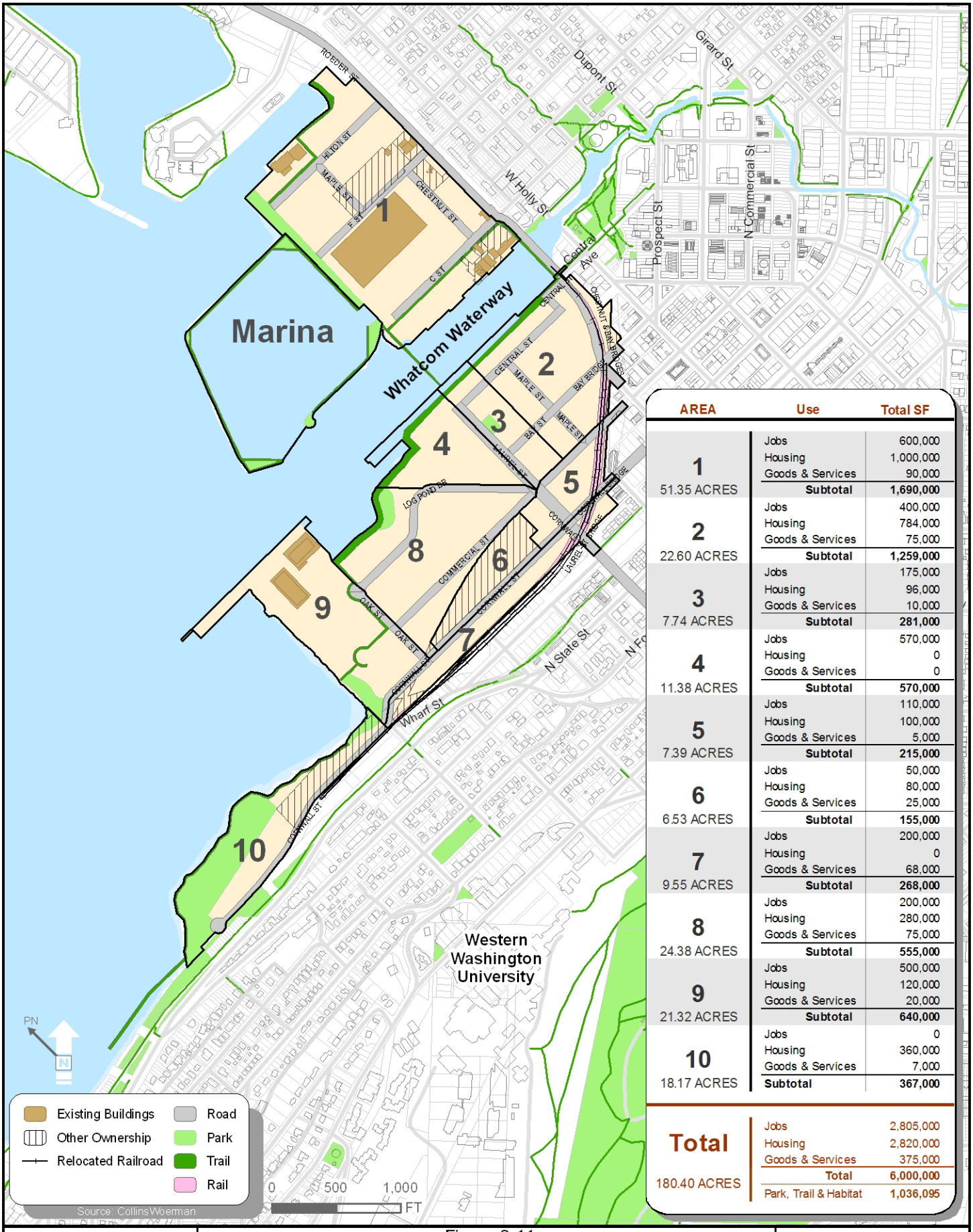
Figure 2-10
Alternative 2A - Medium Density Alternative
2016

New Whatcom Redevelopment EIS



AREA	Use	Total SF
1 51.35 ACRES	Jobs	600,000
	Housing	1,000,000
	Goods & Services	90,000
	Subtotal	**1,690,000**
2 22.60 ACRES	Jobs	400,000
	Housing	784,000
	Goods & Services	75,000
	Subtotal	**1,259,000**
3 7.74 ACRES	Jobs	175,000
	Housing	96,000
	Goods & Services	10,000
	Subtotal	**281,000**
4 11.38 ACRES	Jobs	570,000
	Housing	0
	Goods & Services	0
	Subtotal	**570,000**
5 7.39 ACRES	Jobs	110,000
	Housing	100,000
	Goods & Services	5,000
	Subtotal	**215,000**
6 6.53 ACRES	Jobs	50,000
	Housing	80,000
	Goods & Services	25,000
	Subtotal	**155,000**
7 9.55 ACRES	Jobs	200,000
	Housing	0
	Goods & Services	68,000
	Subtotal	**268,000**
8 24.38 ACRES	Jobs	200,000
	Housing	280,000
	Goods & Services	75,000
	Subtotal	**555,000**
9 21.32 ACRES	Jobs	500,000
	Housing	120,000
	Goods & Services	20,000
	Subtotal	**640,000**
10 18.17 ACRES	Jobs	0
	Housing	360,000
	Goods & Services	7,000
	Subtotal	**367,000**
Total 180.40 ACRES	Jobs	2,805,000
	Housing	2,820,000
	Goods & Services	375,000
	Total	**6,000,000**
	Park, Trail & Habitat	1,036,095

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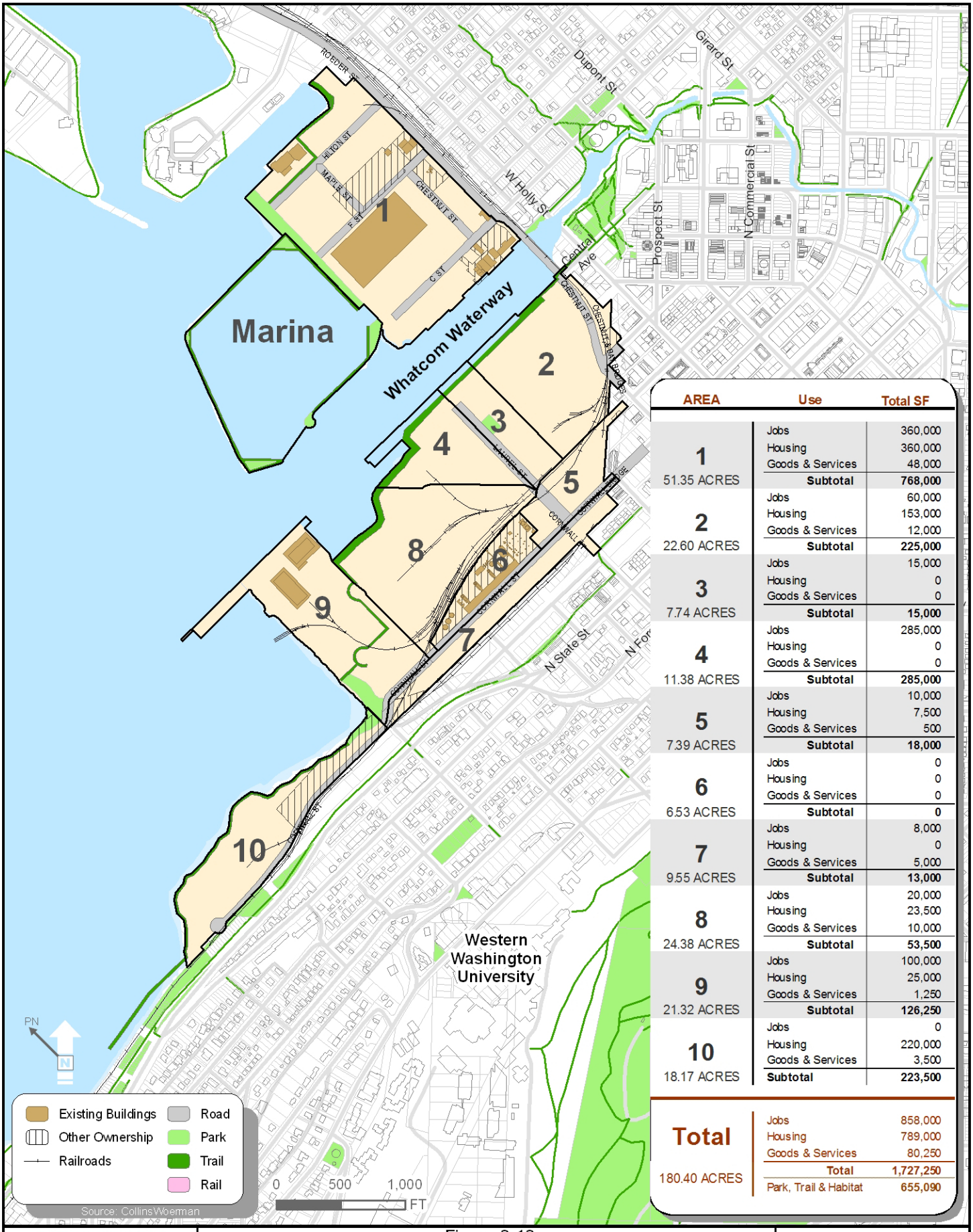
Figure 2-11
Alternative 2A - Medium Density Alternative
2026

New Whatcom Redevelopment EIS



AREA	Use	Total SF
1 51.35 ACRES	Jobs	360,000
	Housing	360,000
	Goods & Services	48,000
	Subtotal	**768,000**
2 22.60 ACRES	Jobs	60,000
	Housing	153,000
	Goods & Services	12,000
	Subtotal	**225,000**
3 7.74 ACRES	Jobs	15,000
	Housing	0
	Goods & Services	0
	Subtotal	**15,000**
4 11.38 ACRES	Jobs	285,000
	Housing	0
	Goods & Services	0
	Subtotal	**285,000**
5 7.39 ACRES	Jobs	10,000
	Housing	7,500
	Goods & Services	500
	Subtotal	**18,000**
6 6.53 ACRES	Jobs	0
	Housing	0
	Goods & Services	0
	Subtotal	**0**
7 9.55 ACRES	Jobs	8,000
	Housing	0
	Goods & Services	5,000
	Subtotal	**13,000**
8 24.38 ACRES	Jobs	20,000
	Housing	23,500
	Goods & Services	10,000
	Subtotal	**53,500**
9 21.32 ACRES	Jobs	100,000
	Housing	25,000
	Goods & Services	1,250
	Subtotal	**126,250**
10 18.17 ACRES	Jobs	0
	Housing	220,000
	Goods & Services	3,500
	Subtotal	**223,500**
Total 180.40 ACRES	Jobs	858,000
	Housing	789,000
	Goods & Services	80,250
	Total	**1,727,250**
	Park, Trail & Habitat	655,090

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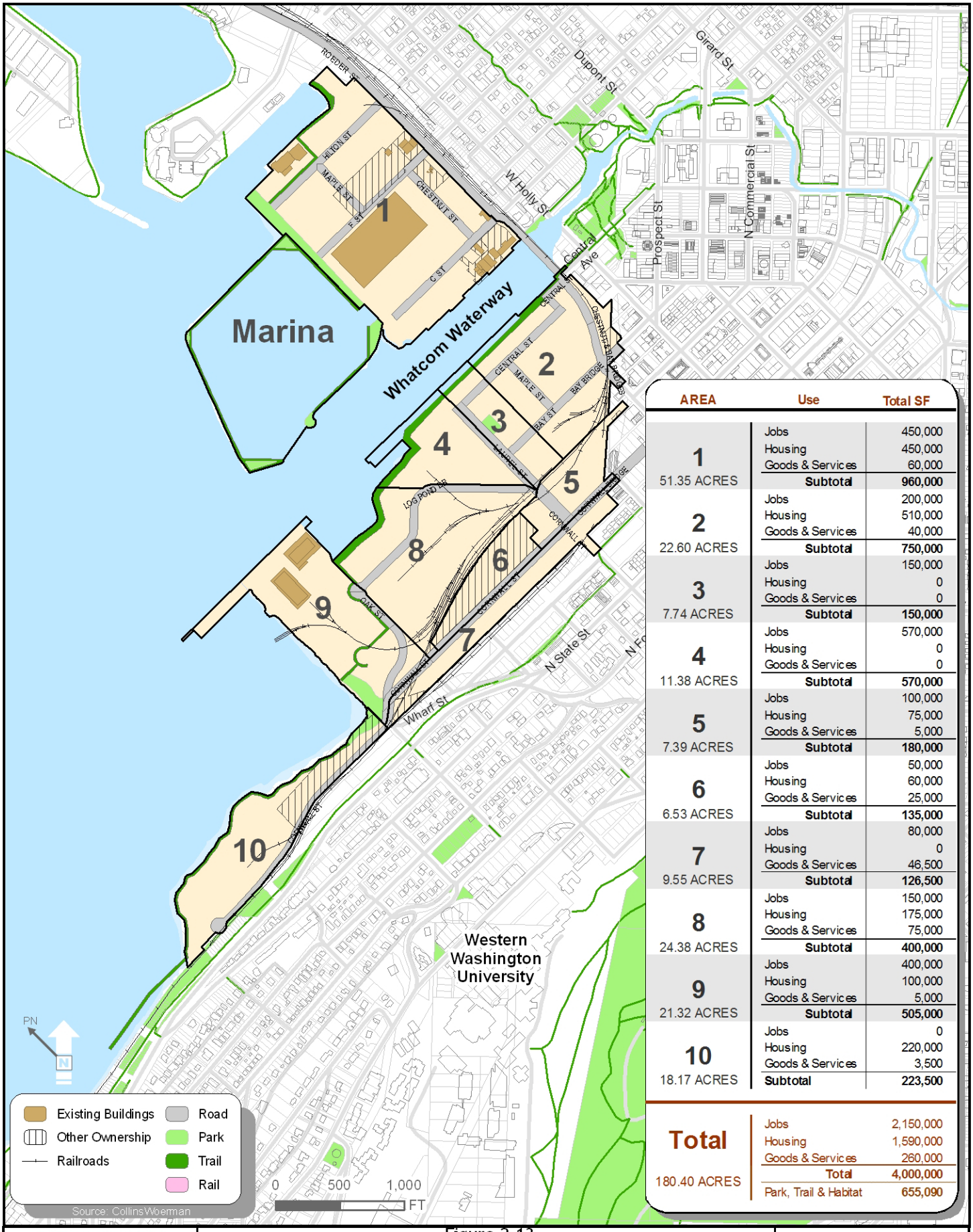
Figure 2-12
Alternative 3 - Lower Density Alternative
2016

New Whatcom Redevelopment EIS



AREA	Use	Total SF
1 51.35 ACRES	Jobs	450,000
	Housing	450,000
	Goods & Services	60,000
	Subtotal	**960,000**
2 22.60 ACRES	Jobs	200,000
	Housing	510,000
	Goods & Services	40,000
	Subtotal	**750,000**
3 7.74 ACRES	Jobs	150,000
	Housing	0
	Goods & Services	0
	Subtotal	**150,000**
4 11.38 ACRES	Jobs	570,000
	Housing	0
	Goods & Services	0
	Subtotal	**570,000**
5 7.39 ACRES	Jobs	100,000
	Housing	75,000
	Goods & Services	5,000
	Subtotal	**180,000**
6 6.53 ACRES	Jobs	50,000
	Housing	60,000
	Goods & Services	25,000
	Subtotal	**135,000**
7 9.55 ACRES	Jobs	80,000
	Housing	0
	Goods & Services	46,500
	Subtotal	**126,500**
8 24.38 ACRES	Jobs	150,000
	Housing	175,000
	Goods & Services	75,000
	Subtotal	**400,000**
9 21.32 ACRES	Jobs	400,000
	Housing	100,000
	Goods & Services	5,000
	Subtotal	**505,000**
10 18.17 ACRES	Jobs	0
	Housing	220,000
	Goods & Services	3,500
	Subtotal	**223,500**
Total 180.40 ACRES	Jobs	2,150,000
	Housing	1,590,000
	Goods & Services	260,000
	Total	**4,000,000**
	Park, Trail & Habitat	655,090

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Figure 2-13
Alternative 3 - Lower Density Alternative
2026

New Whatcom Redevelopment EIS

As indicated previously, each of the Redevelopment Alternatives assumes a certain density and level of redevelopment and a range of parks, trails and open space that would be accessible to the public. 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 would 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 a final 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 MDP process. That is, a less dense alternative (i.e. Alternative 2 or 3), that assumes less redevelopment than the higher density alternative (Alternative 1) could ultimately be matched with a greater amount of parks and open space than is currently assumed for a less dense alternative. Additionally, other features, such as the road network, building heights, parking ratios, and other elements of redevelopment could be mixed and matched among the range of alternatives to arrive at the MDP. It is also assumed that the potential breakdown of uses (level of office, institutional, industrial and retail) and the location of such uses within the redevelopment areas of the site could be mixed and matched as part of the MDP. It is expected that the parameters reflected in an adopted MDP would be within the range of assumptions and impacts tested in this EIS.

Further, it is assumed that the MDP would provide flexibility for future redevelopment to adjust to economic and market conditions over time and to the requirements of specific developers/tenants; therefore, the final MDP would not likely prescribe specific building footprints, sizes and designs, exact locations of uses within redevelopment areas or specific designs of the park and trail system (see discussion below).

2.8.1 EIS Alternatives Overview

A definitive plan for long-term redevelopment of the New Whatcom site cannot be formulated at this stage, as specific developers, tenants and users have not been and cannot reasonably be identified for a 20-year redevelopment buildout. Therefore, specific building footprints, sizes and designs, the specific location of uses within each area of the site and the specific layout and design of parks, trails and open space cannot be pinpointed. However, in order to conduct comprehensive environmental review, a number of assumptions have been developed for the EIS Alternatives related to the continuation of certain existing uses on the site, amount of mixed use development, amount of open space (including parks, trails and habitat), building heights, road network, utility and stormwater concept, impervious area, parking ratios, employment numbers, etc (refer to **Appendix C** for a summary of the key redevelopment assumptions by alternative). These assumptions create an envelope of potential redevelopment and a range of redevelopment scenarios (without having specific building plans) and allow for the analysis of probable significant environmental impacts under SEPA. **Tables 2-3** and **2-4** illustrate the range of site redevelopment assumed under the EIS Alternatives for the years 2016 and 2026, respectively. The tables show the assumed land use characteristics, including uses, total square footage of redevelopment, parking, open space, and other features under each of the Alternatives. Refer to **Appendix C** to this Draft EIS for a breakdown of specific uses under the more general “Assumed Uses” highlighted in the tables below.

Table 2-3
DEVELOPMENT SUMMARY OF EIS ALTERNATIVES - 2016

	Alternative 1	Alternative 2	Alternative 2A	Alternative 3	Alternative 4 (No Action Alternative)
Assumed Uses (ft^2)					
Office/Institutional/ Commercial	976,000	753,000	Same as Alt. 2	548,000	0
Marine Industrial	310,000	330,000	Same as Alt. 2	310,000	520,000
Goods & Services[1]	151,000	125,500	Same as Alt. 2	80,250	0
Residential	1,931,500	1,480,600	Same as Alt. 2	789,000	0
Total New Uses[1]	**3,368,500[2]**	**2,689,600[2]**	Same as Alt. 2	**1,727,250[2]**	**1,097,500[3]**
Parks & Open Space	33 acres	24 acres	Same as Alt. 2	15 acres	0
Residential Units	1,610	1,234	Same as Alt. 2	658	0
Parking Stalls	6,334	4,974	Same as Alt. 2	3,124	N/A

Source: CollinsWoerman, 2007

[1] Includes retail, restaurant and service type uses.

[2] The total square footage includes some redevelopment of existing building space. Up to 12 buildings with a total of 445,300 square feet of building space could be redeveloped by full buildout in 2026.

[3] The total square footage includes approximately 577,500 sq. ft (50% of total 1,155,000 sq. ft.) of existing space in 36 buildings onsite that would be assumed to be retained and reused under the No Action Alternative.

N/A – not applicable or known

The range of building height assumptions differs among the EIS Alternatives, with the tallest building heights assumed under Alternatives 1 and 2, and lower building heights assumed under Alternatives 3 and 4 (No Action). **Table 2-5** illustrates the assumed building heights under the EIS Alternatives by redevelopment area.

In addition to assumptions related to building area, building heights and park and open space (as listed in **Tables 2-3 through 2.5** above), the EIS Alternatives include assumptions regarding the PSE Encogen facility, the relocation of the current BNSF railroad corridor and the marina.

The Redevelopment Alternatives (Alternatives 1 through 3) assume that the Puget Sound Energy Encogen facility remains in operation through the year 2016 and will then relocate or abandon its operations by 2026. By 2026, this portion of the site would be available for redevelopment. The No Action Alternative assumes that the Encogen facility remains in operation through 2026 (see Section 2.8.2, **Description of Features Common to Alternatives 1 through 3)**, below for detail).

Table 2-4
DEVELOPMENT SUMMARY OF EIS ALTERNATIVES - 2026

	Alternative 1	Alternative 2	Alternative 2A	Alternative 3	Alternative 4 (No Action Alternative)
Assumed Uses (ft^2)					
Office/Institutional/ Commercial	2,915,000	2,355,000	Same as Alt. 2	1,700,000	0
Marine Industrial	450,000	450,000	Same as Alt. 2	450,000	1,040,000
Goods & Services[1]	445,000	375,000	Same as Alt. 2	260,000	0
Residential	3,690,000	2,820,000	Same as Alt. 2	1,590,000	0
Total New Uses	**7,500,000[2]**	**6,000,000[2]**	Same as Alt. 2	**4,000,000[2]**	**2,195,000[3]**
Parks & Open Space	33 acres	24 acres	Same as Alt. 2	15 acres	0
Residential Units	3,075	2,350	Same as Alt. 2	1,325	0
Parking Stalls	15,863	12,668	Same as Alt. 2	8,513	N/A

Source: CollinsWoerman, 2007

[1] Includes retail, restaurant and service type uses.

[2] The total square footage includes some redevelopment of existing building space. Up to 12 buildings with a total of 445,300 square feet of building space could be redeveloped by full buildout in 2026.

[3] Considering the assumed retention and reuse of the existing 1,155,000 square feet of industrial space and the 1,040,000 square feet of new space, total building area on the site would be 2,195,000 square feet under the No Action Alternative.

N/A – not applicable or known

Table 2-5
MAXIMUM BUILDING HEIGHT SUMMARY OF REDEVELOPMENT ALTERNATIVES

	Alternative 1	Alternative 2	Alternative 2A	Alternative 3
Redevelopment Area				
1	100 feet	75 feet	Same as Alt. 2	75 feet
2	200 feet	140 feet	Same as Alt. 2	100 feet
3,5	150 feet	100 feet	Same as Alt. 2	100 feet
4, 6-10	100 feet	75 feet	Same as Alt. 2	75 feet

Source: CollinsWoerman, 2007

Three of the four Redevelopment Alternatives assume that the current BNSF railroad corridor on the site will be relocated to the eastern border of the site, adjacent to the bluff; Alternative 1 and Alternative 2 assume relocation of the railroad corridor by 2016, and Alternative 2A assumes relocation of the railroad corridor by 2026. Alternative 3 and the No Action Alternative assume the railroad corridor remains in its current location. The railroad corridor relocation would be subject to a specific permitting and environmental review process that could be undertaken by the Washington State Department of Transportation, in conjunction with BNSF, in the future (see Section 2.8.2, **Description of Features Common to Alternative 1 through 3 (Redevelopment Alternatives)**, below for detail).

Consistent with the recent notice of intent by Georgia-Pacific to cease onsite operations, the Redevelopment Alternatives assume that the Georgia-Pacific Tissue Mill will cease operations; it is assumed that the mill and other associated Georgia-Pacific facilities will be demolished and remediated per MTCA requirements, allowing redevelopment to a mix of uses in Areas 2, 3 and 4.

The No Action Alternative assumes that the Proposed Actions would not be approved or implemented (i.e. the Master Development Plan and Development Agreement would not be approved); therefore, this Alternative assumes that the site would remain in its industrial zoning classification. It is further assumed that some level of redevelopment would occur on the site over the 20-year build out horizon, including new industrial development and a new marina, boat launch, and boat haul-out facilities consistent with existing zoning and the Port's condemnation action. As indicated in **Section 2.6** of this Chapter, an alternative marina configuration is analyzed under Alternatives 1 through 3; the analysis of this alternative marina configuration will include a comparison to the marina described and analyzed under the No Action Alternative.

2.8.2 Description of Features Common to Alternatives 1 through 3 (Redevelopment Alternatives)

The four EIS Alternatives meeting the Port's objectives (Alternatives 1, 2, 2A and 3) incorporate a number of common site development features. These features relate to providing opportunities for a range of new uses and activities; connecting the New Whatcom site with the surrounding community; providing community benefits through public access to the waterfront and new open space opportunities; and creating a vibrant area that integrates water-dependent uses and open space with new office, retail, services, institutional and residential uses. Although aspects of the New Whatcom plan could be refined as the Port and City continue through the master planning process, the following features are assumed to be generally common to Alternatives 1 through 3 for purposes of this Draft EIS; variations in assumptions between the Redevelopment Alternatives are also described.

Assumptions formulated for the redevelopment features described in more detail below relate to:

- Marina Concept A
- Restoration of a Natural Shoreline along the South Side of the Whatcom Waterway
- Transient Moorage within the Whatcom Waterway
- Burlington Northern Santa Fe Railroad
- Puget Sound Energy Encogen Facility
- Parks and Open Space
- Uses within 200-foot Shoreline Jurisdiction
- Pedestrian bridge over Whatcom Waterway
- Roadway System
- Affordable Housing Provisions
- Existing Buildings
- Broadway Pedestrian Connection
- Development Phasing
- Parking Strategy

Marina Concept A

If the Proposed Actions are approved, the marina design would differ from the marina planned to be developed under the No Action Alternative (Marina Concept B). As identified in the Applicants Objectives, the Port intends to *"incorporate features into the planned marina to complement future mixed-use redevelopment, including different boat slip configuration, public walkway/small parks around the perimeter of the marina and enhanced habitat opportunities*".

Development of a marina by the Port in association with mixed-use redevelopment (Marina Concept A) would occur in the ASB basin subsequent to cleanup actions, as generally described in **Section 2.3.1** of this Chapter.

The Marina Concept A would include up to 460 boat slips, compared with up to 600 boat slips under Marina Concept B. A parking lot for marina users would be located adjacent to the northeast corner of the marina in Area 1 (up to 280 spaces). The marina would include construction of a five to eight lane boat launch ramp inside the marina basin with an associated 90-stall upland boat trailer parking area located in Redevelopment Area 1 adjacent to the southeast corner of the marina: this boat launch would replace the Port of Bellingham's existing four lane boat launch located within the Squalicum harbor. A 40-space marina loading zone and short-term parking area would be provided adjacent to the boat launch. The opportunity for boat dry dock storage use would be provided in Area 1. A gate house would be provided; the gatehouse would include a harbor master's office, shop, laundry and shower facilities. Support facilities, including a pumpout station and fueling facility, would be provided. Consistent with live-aboard rates at other marinas (including Squalicum Marina), it is assumed that approximately two percent of marina slips would contain live-aboards; with an assumed 460 slip marina, approximately 9 live-aboards would be assumed. (see **Figure 2-14** for the Marina Concept A plan).

Marina Concept A would be designed and constructed to meet the applicable requirements of the City's Shoreline Master Program (SMP). (As noted in **Section 2.6**, the Port has submitted a complete Shoreline Substantial Development Permit application to the City that reflects Marina Concept A. This permit application is subject to the regulations in place at the time a complete application was submitted, including existing SMP regulations (see Section 3.8, **Relationship to Plans and Policies**, for more information on the marina and the SMP).

Establishment of a marina in the remediated ASB (under both marina concepts) would provide new marine habitat in Bellingham Bay. New habitat features associated with Marina Concept A would include: the addition of approximately 28 acres of new habitat area in proximity to salmon spawning habitat associated with the Whatcom Creek estuary; creation of shallow habitat benches (utilized by young salmon to escape predators); and, provision of salmon passage tunnels to provide additional connections between the newly established marina habitat and the Whatcom Creek estuary (refer to Section 3.4, **Plants and Animals**, Chapter 3 of this Draft EIS for more information).

Other features incorporated into Marina Concept A (in addition to those contemplated for the Marina Concept B) include: the provision of approximately one mile of pedestrian trail around the perimeter of the marina; provision of approximately 3.17 acre of open space/park area around the marina, including open space/park area along the western edge of Area 1 and up to five other park/open space areas along the breakwater; and, approximately 4.7 acres of new

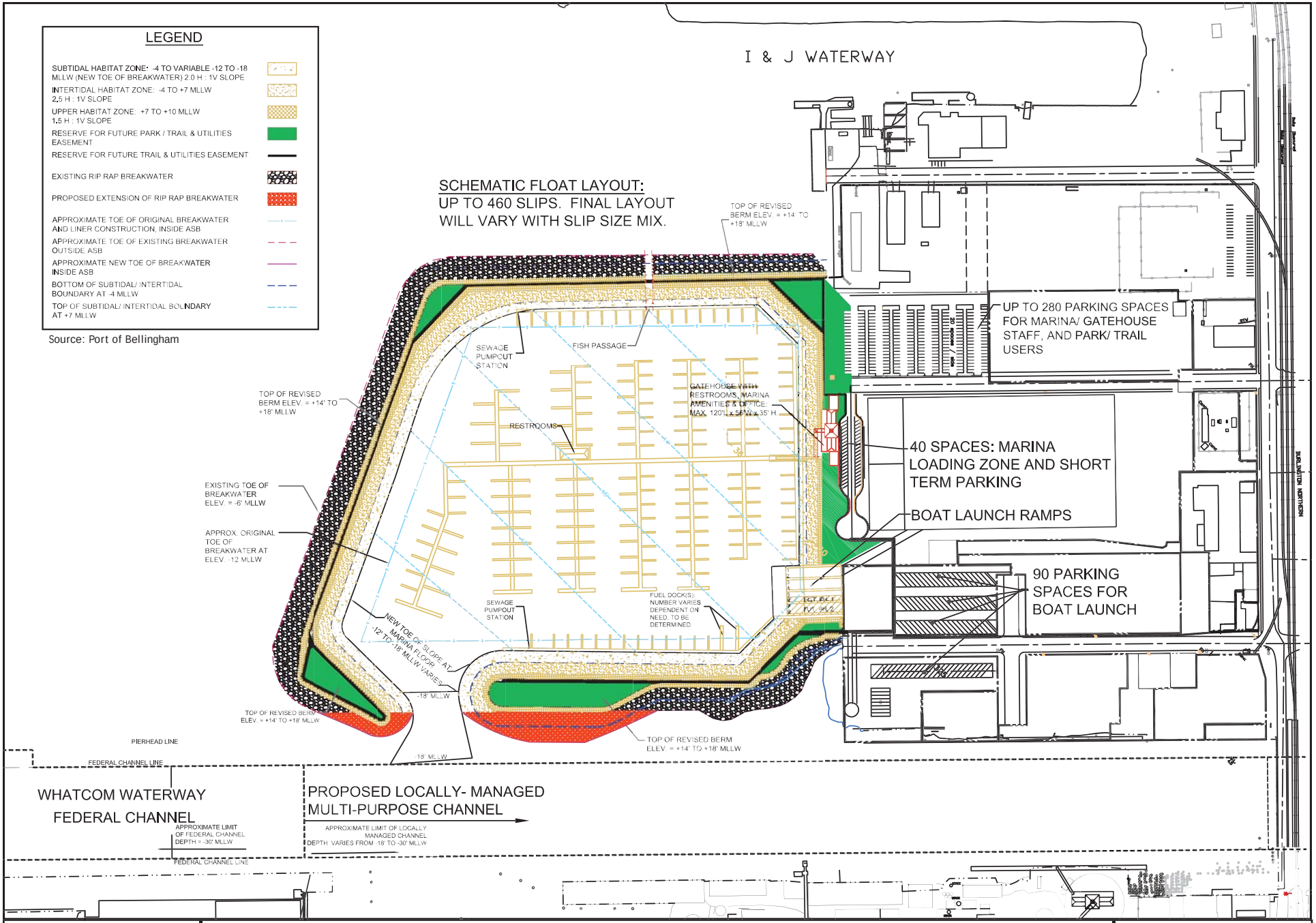

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Figure 2-14
Marina Concept "A"

New Whatcom Redevelopment EIS

intertidal and shallow subtidal habitat inside the basin along the inner edge of the breakwater. Compared to Marina Concept B, cleanup actions assuming development of Marina Concept A would incorporate more reuse of clean breakwater material to accommodate perimeter walkway and park area, and use of additional dredged clean sediments from the ASB basin for use as in-water shore habitat area.

Development of a marina with up to 460 slips would result in in-water and over-water features within the basin, although at a lower level than under Marina Concept B. These features would include placement of up to 300 piles (compared to 360 under Concept B), up to 120,000 square feet of float area coverage (compared to 138,000 square feet under Marina Concept B), and approximately 1,200 square feet of ramp coverage area (similar to that under Marina Concept B) (refer to Section 3.4, **Plants and Animals**, of this Draft EIS for more information).

Operation of the marina would follow the Best Management Practices (BMPs) outlined in the Washington State Department of Ecology *Resource Manual for Pollution Prevention in Marinas* (Ecology, May, 1998 – Publication 9811) (A copy of the Ecology *Resource Manual for Pollution Prevention in Marinas* is referenced in **Appendix G** to this Draft EIS and is on file for review at the Port and City.)

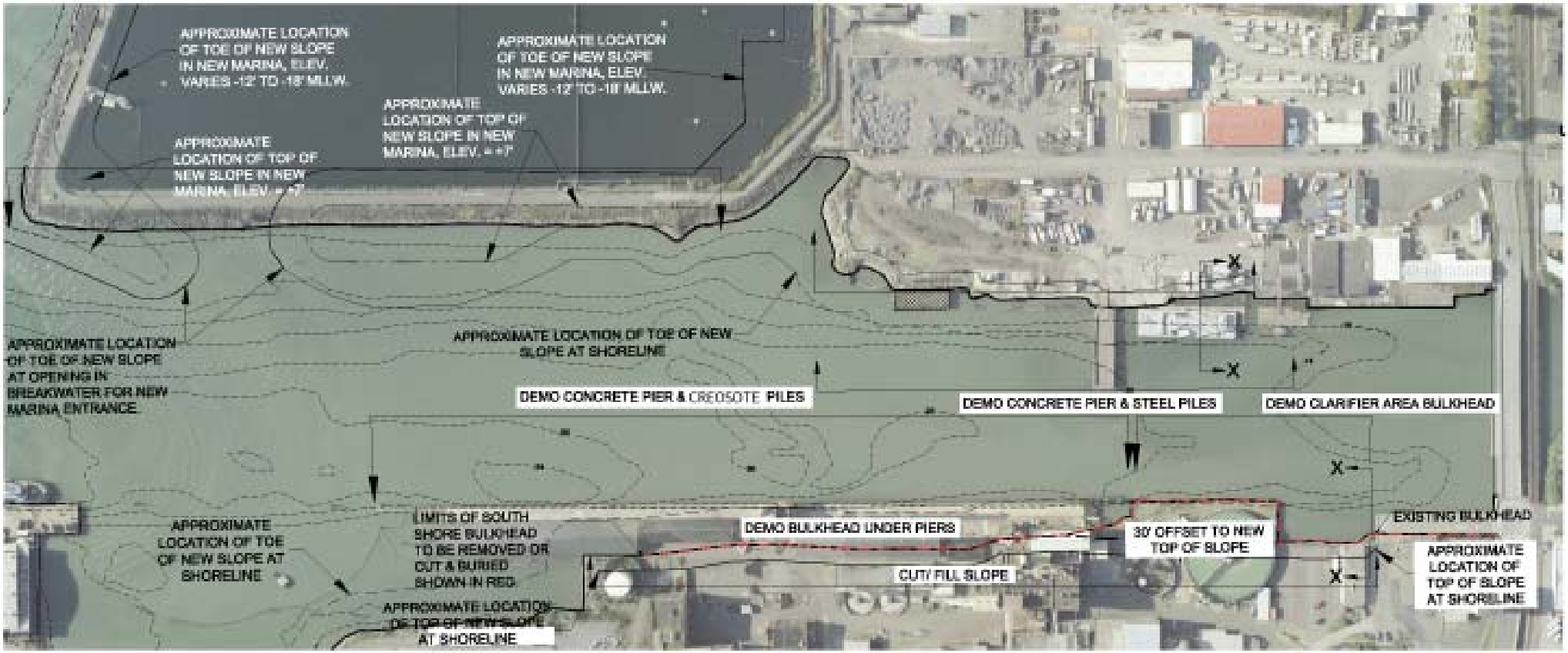
Restoration of a Natural Shoreline Along Southern Side of Whatcom Waterway

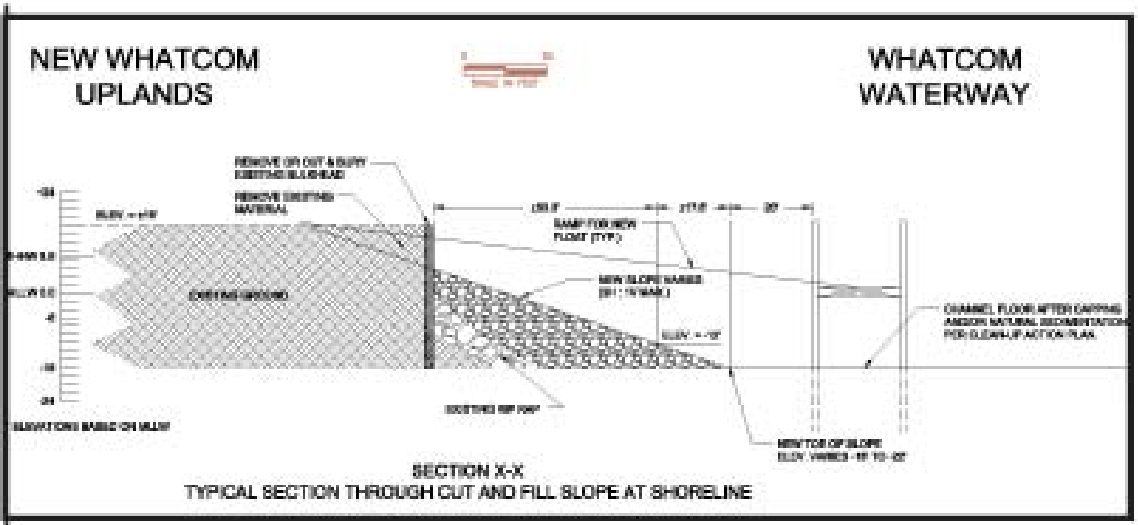
A major element of New Whatcom master planning, as reflected in the Redevelopment Alternatives (Alternatives 1 through 3) is the restoration of a natural shoreline, soft beach and marine habitat area along the southern edge of the Whatcom Waterway.

To accommodate the restoration of the natural shoreline under Alternatives 1 through 3, the following existing features on the south side of the Whatcom Waterway would be removed: approximately 98,700 square feet of over-water wharf (including approximately 430 steel piles and 560 creosote piles); approximately 1,030 linear feet of bulkhead and associated rip rap; and, approximately 460 linear feet of bulkhead (and associated rip rap) covering approximately 1,890 square feet of shallow water area. It is assumed that the eastern portion of the existing wharf along this southern edge of the Whatcom Waterway (Central Street right-of-way) would be retained. See **Figure 2-15** for the location of the existing bulkhead and wharf features to be removed (refer to Section 3.4, **Plants and Animals** for details on habitat issues).

Subsequent to the removal of portions of the existing wharf, bulkhead and other associated features under Alternatives 1 through 3, approximately 1,500 linear feet of shoreline would be restored to create approximately 2.4 acres of new natural shoreline and beach area, and approximately one acre of upland open space area. This natural shoreline area would include terraced natural shoreline and beach habitat area between the Ordinary High Water Mark (OHWM) and the Mean Low Low Watermark (MLLW). An approximately 25-foot wide buffer of native vegetation would be provided upland of the Ordinary High Water Mark. (Refer to Section 3.4, **Plants and Animals**, for details on habitat issues.)

Without mixed-use redevelopment of the New Whatcom site, it is assumed that the existing wharf and bulkhead features on the south side of the Whatcom Waterway would remain and the restored natural shoreline, beach area and marine habitat under Alternatives 1 through 3 would not be provided.





BLUMEN CONSULTING GROUP, INC	Figure 2-15 Existing Bulkhead & Wharf Features to be Removed for Shoreline Restoration	New Whatcom Redevelopment EIS

Transient Moorage within Whatcom Waterway

To complement mixed-use redevelopment of the New Whatcom site, visitor moorage floats within the Whatcom Waterway are included as elements of Alternatives 1 through 3. The transient moorage floats would allow boaters to temporally dock boats and access uses at the New Whatcom site.

The transient moorage floats would be located parallel to the north and south shorelines of the waterway and would be accessed from the shore via ramps. Along the south side of the Whatcom Waterway, two 1,500-foot long by 20-foot wide floats with associated 120-foot long by 10-foot wide ramps are proposed; over-water coverage of these two floats and ramps would total approximately 32,400 square feet. Sixty-four steel piles would be required to support the floats and ramps.

Two transient moorage floats would be located parallel to the north side of the Whatcom Waterway and would include a 900-foot long by 20-foot wide float with an associated 120-foot long by 20-foot wide ramp, and a 600-foot long by 20-foot wide float with an associated 120-foot long by 10-foot wide ramp. Over-water coverage of the two transient moorage floats along the north side of the Whatcom Waterway would total approximately 32,400 square feet. Approximately 64 steel piles would be required to support the floats and ramps.

Burlington Northern Santa Fe Railroad (BNSF)

As described earlier in this chapter, a railroad corridor bisects the site in a reverse “s” curve configuration. In support of mixed-use redevelopment of the site, the Washington State Department of Transportation is currently working with BNSF, the Port and City to relocate the main line to follow the eastern and southern border of the site, adjacent to the bluff.

Three of the four Redevelopment Alternatives assume that the current railroad corridor on the site will be relocated to the eastern and southern border of the site; Alternative 1 and Alternative 2 assume relocation of the railroad corridor by 2016, and Alternative 2A assumes relocation of the railroad corridor by 2026. Alternative 3 assumes that the railroad corridor remains in its current location. The railroad corridor relocation would be subject to a specific permitting and environmental review process that could be undertaken by BNSF/Washington State Department of Transportation in the future.

Puget Sound Energy Encogen Facility

As described earlier in this chapter, Puget Sound Energy (PSE) currently operates the Encogen facility (Encogen), a natural gas-fired cogeneration plant, which is located within Area 6 of the site. Given the planned termination of Georgia-Pacific activities, it is assumed that PSE will continue its operations as a peak power generation facility and will pursue the necessary permits for discharge of its wastewater in the interim.

However, based on the long-term nature of redevelopment considered in this EIS, the Redevelopment Alternatives (Alternatives 1 through 3) assume that the Puget Sound Energy Encogen facility will remain in operation through the year 2016, but will relocate or abandon its operations by 2026, resulting in this portion of the site being available for redevelopment. Under the No Action Alternative, the Encogen facility is assumed to remain in its current location for the foreseeable future.

Parks and Open Space

As part of the definition of the EIS Alternatives, the general size and location of the various public park and trail components have been identified. However, the specific features that would be provided, and the design, layout and configuration of the onsite public parks and trails has not been determined at this stage. As part of the Master Development Plan process, as well as future planning and design by the City and Port, the specific delineation of the park land and specific features within the network of onsite parks and trails would be determined. For purposes of analysis in this Draft EIS, the following park and recreational opportunities are assumed, including both active and passive opportunities.

The New Whatcom parks, trails and open space concept is intended to provide a wide range of passive and active recreational uses. Although the overall parks and open space concept is reflected in all of the Redevelopment Alternatives (EIS Alternative 1 through 3), for environmental review purposes the overall amount and configuration of park and open space on the site differs among the Redevelopment Alternatives, with the overall amount of open space greatest under the higher density alternative (Alternative 1) and lowest under the lower density alternative (Alternative 3). The parks and open space opportunities that are assumed to be similar under all EIS Redevelopment Alternatives (Alternatives 1 through 3) are described below, followed by additional park, trail and open space features assumed for EIS Alternatives 1 and 2 (refer to **Figures 2.6** through **2.13** for assumed locations of public park and open space features under the Redevelopment Alternatives). Placeholder names have been assigned to various park and trail features for descriptive purposes in this EIS. These placeholder names should be considered temporary and would likely be replaced in the future.

1. A linear trail and open space corridor along Bellingham Bay at the western edge of Area 1 would be provided (Shoreline Buffer Marine Trades Park). This corridor would provide public access to the bay, marina and I & J Waterway. The pedestrian and bicycle trail (Warehouse Trail) within this linear corridor would provide the opportunity to link with the existing Harbor Loop Trail around the Squalicum Inner Harbor which currently ends at Bellwether Way, as well as connect with the surrounding neighborhood via a pedestrian connection at F Street.

2. A new trail/open space corridor would be provided along the southern edge of the I & J Waterway (Shoreline Trail from I & J to Marina). An open space area would be created at the eastern end of the I & J Waterway for passive uses associated with hand-carry boat launching and beach access; shoreline habitat would also be provided in association with this area.

3. An approximately 0.6 mile long open space/trail corridor traversing the breakwater around the marina would be provided. This area would include a trail (Marina Long and Short Arm) and five small passive park areas (Marina Park).

4. An approximately 0.5 mile long linear trail/open space corridor and habitat enhancement would be provided along the southern edge of the Whatcom Waterway and the bay from approximately Holly Street on the east to Oak Street on the west (i.e. along the waterfront portions of Areas 2, 3, 4 and 8) (Whatcom Waterway Trail, Shoreline Buffer Mill Reserve Park Trail, Shoreline Buffer Historical District Park Trail, Waterfront Park Trail, and Log Pond Park Trail). The pedestrian and bicycle trail would connect the New Whatcom site with the Maritime Heritage Park and the

Whatcom Creek Trail beyond. This corridor would provide substantial opportunities for public access to the waterfront. The width of this corridor would vary among the Redevelopment Alternatives.

5. A central urban park would be provided along Laurel Street in Area 3 (Pocket Park Historical District). This park is intended to provide a focal point and gathering space for areas away from the waterfront.

6. A beach park (Beach Park Marine Facility) at the southern end of Cornwall Avenue would be provided to formalize and enhance current informal beach access and kayak launch uses.

7. Linear open space/trail area in Area 9 to Bellingham Bay along the northern edge of Area 10 would be provided (Wharf Street Trail, Cornwall Park to Beach Park Trail).

   Development of other trail features, including an over-water trail connection between Boulevard Park and the western end of Area 10 and a high-speed bicycle trail parallel to the bluff in Areas 7 and 10 is also being planned by the City. These potential features have not been planned to sufficient detail to be fully analyzed in this EIS (i.e. the location and area of the trail system has not been defined). See Section 2.9, **Separate Actions/Background Projects**, for more information on these potential separate projects.

   The connection of the linear open space/trail area mentioned above (in Area 9 to Bellingham Bay along the northern edge of Area 10) to the City's potential over-water trail connection (between Boulevard Park and the western end of Area 10) would complete a trail corridor linking the Maritime Heritage Park and the Whatcom Creek Trail to the east, with Boulevard Park and the South Bay Trail system to the south and west.

Additional park and open space opportunities identified under EIS Alternative 1 (Higher Density Alternative) and EIS Alternative 2 (Medium Density) include:

8. An approximately 200-foot wide beach park (Cornwall Park), comprising approximately 8.1 acres in area, along the shoreline of Area 10 providing passive recreation, public gathering and views of the bay (Alternatives 1 and 2);

9. An approximately .9-acre park (I & J Waterway Park) at the eastern end of the I & J Waterway providing passive recreation in association with access to the water described under item 2 above (Alternative 1);

10. An approximately 100-foot to 200-foot wide linear park (Shoreline Buffer Mill Reserve Park, Shoreline Buffer Historical District Park, Waterfront Park, and Log Pond Park) along the southern edge of the Whatcom Waterway (along the waterfront portions of Areas 2, 3, 4 and 8) augmenting the trail corridor described under item 4 above (Alternative 1); and,

11. A pedestrian bridge (Pedestrian Bridge) over the Whatcom Waterway connecting the proposed trail system north of the Waterway with the proposed trail system south of

the Waterway (Alternatives 1 and 2 – refer to the detailed discussion on the **Pedestrian Bridge** provided later in this section).

12. A new trail/open space corridor along Wharf Street and the Wharf Street Bridge augmenting the trail corridor described under item 7 above (Alternative 1).

Total public park/open space under the Redevelopment Alternatives would range from 33 acres under Alternative 1 to 24 acres under Alternative 2/2A and 15 acres under Alternative 3; this total does not include other potential open space such as courtyards, gardens and landscaped space that would likely be developed on the site as part of specific redevelopment projects.

Uses Within 200-foot Shoreline Jurisdiction

The Shoreline Master Program (SMP) for the City of Bellingham establishes goals and guidelines for uses within 200 feet of the Ordinary High Water Mark (OHWM); this 200-foot wide area is termed the "shoreline jurisdiction". The SMP goals relate to use, restoration, conservation, economic development, public access, recreation, history/culture/education and water quality within the shoreline jurisdiction. The City of Bellingham is currently updating its SMP, with City Council adoption of the SMP update anticipated in 2008. The existing shoreline regulations will remain in effect until the updated SMP regulations are adopted. For purposes of this Draft EIS, it is assumed that the updated SMP regulations would be adopted prior to commencement of New Whatcom redevelopment activities in the shoreline area, except for the development of the marina at the remediated ASB and associated facilities (i.e. boat launch, parking areas, gatehouse). It is assumed that the marina development would occur subject to the existing shoreline regulations since a complete Shoreline Substantial Development Permit for the marina has been submitted by the Port to the City (refer to Section 3.8, **Relationship to Plans and Policies**, for more information on the SMP and the marina application).

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 input and comply with the State of Washington Shoreline Management Act. "Special Area Planning" is a regulatory tool used to allow governments to address shoreline management issues on complicated sites where a range of issues must be addressed.

Staff recommendations to the Draft SMP update "New Whatcom Designation" include standards for permitted uses, buffers and setbacks, height and public access. Features of the New Whatcom Redevelopment Project assumed to be within the shoreline jurisdiction are consistent with the current staff recommendations to the Draft SMP update. The staff recommendations are assumed to represent the minimum standards (i.e. smallest shoreline setback) that would be potentially adopted by the City; ultimately, the adopted standards could be more rigorous. Any future redevelopment on the site (with the exception of the marina which is regulated under the existing SMP) would be required to be consistent with adopted applicable City of Bellingham SMP regulations.

The Port of Bellingham's objectives for the New Whatcom Redevelopment project include "*creation of a vibrant area that integrates water-dependent uses and open space with new mixed-uses," "identify opportunities to restore, enhance and create habitat along the waterfront environment within the context of creating an economically-viable redevelopment*", and "increase public access to the waterfront".

The following features related to the shoreline are reflected in the Redevelopment Alternatives (Alternatives 1 through 3).

- Little to no public access to the shoreline is presently available at the site. Proposed redevelopment would provide public access to the majority of the site's shoreline. A majority of the remaining shoreline would be reserved for industrial and marine access and uses.

- Parks and trails along the shoreline would be developed to balance access with habitat restoration and protection.

- Recreation opportunities are essentially unavailable on the site. Passive and active recreation opportunities, including kayak launch, walking, bicycling, etc. would be provided in parks and trails along the north and south shore of the Whatcom Waterway, as well as at other locations along Bellingham Bay.

Restoration of shoreline habitat would be similar under the Redevelopment Alternatives (Alternatives 1 through 3). Shoreline habitat restoration features planned for each redevelopment area are described below. **Figures 2-16** through **2-28** provide conceptual illustrations of potential redevelopment within various areas of the site under the shoreline jurisdiction under Alternatives 1, 2 and 3.

Redevelopment Area 1

- Beach habitat planned at the eastern end of the I & J Waterway would be restored.

- The character of piers and wharf bulkheads along the south shore of I & J Waterway would be retained.

Redevelopment Area 2

- The over-water pier (elevated street) at Central Street right-of-way would remain.

- Habitat along Whatcom Creek, extending out into the Whatcom Waterway along the Roeder Avenue Bridge, would be restored.

- The pier along the southern shoreline of the Whatcom Waterway would be removed and restored with terraced natural shoreline habitat.

Redevelopment Area 3

- The pier along the southern shoreline of the Whatcom Waterway would be removed and restored with terraced natural shoreline habitat.

Redevelopment Area 4

- Piers and wharfs along the southern shoreline of the Whatcom Waterway would be removed and restored with a combination of terraced natural and log pond beach habitat.

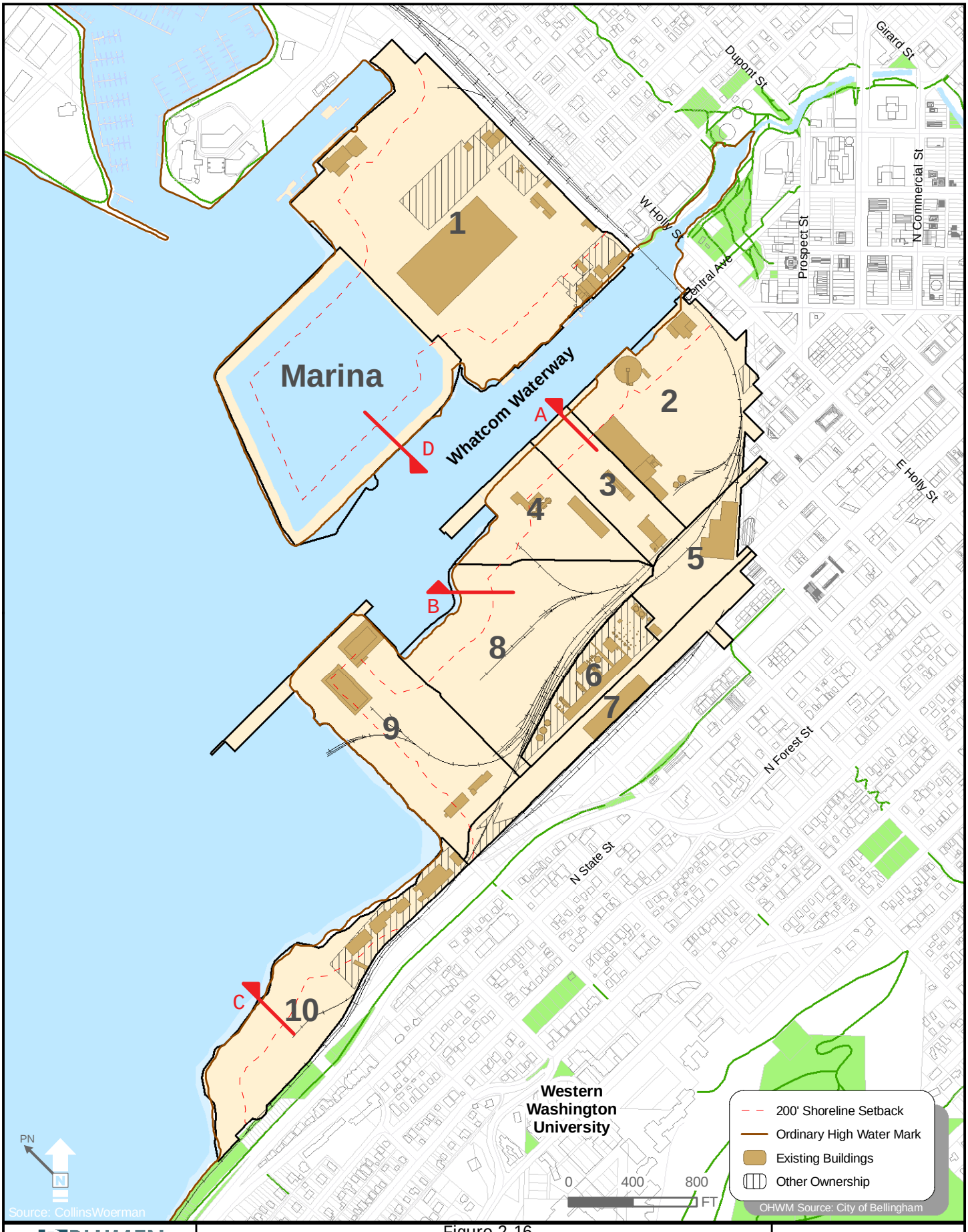


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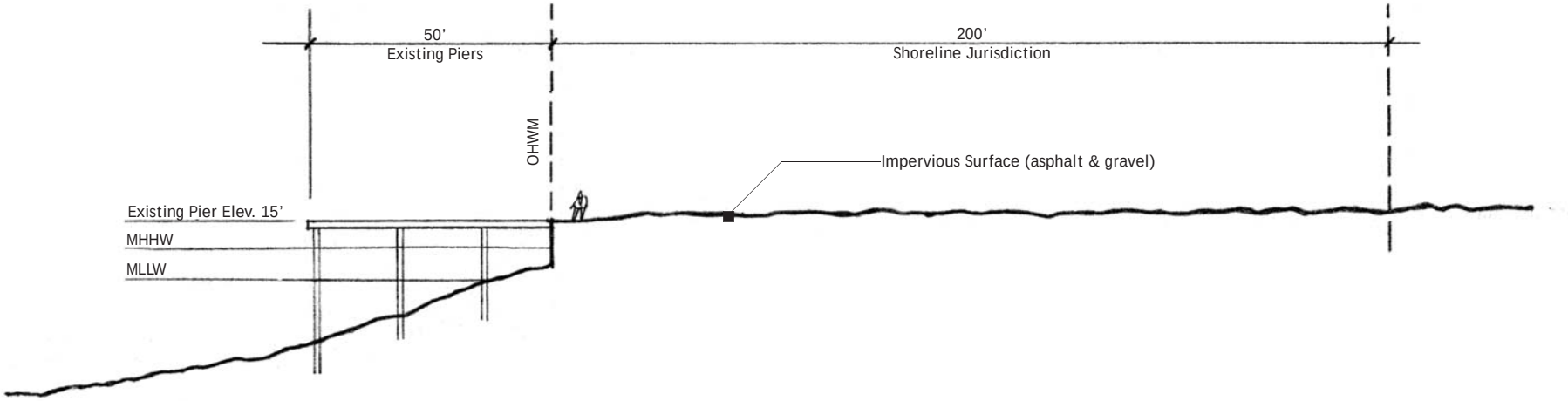
Figure 2-16
Shoreline Cross Section Locations
Existing Conditions

New Whatcom Redevelopment EIS



OHWM - Ordinary High Water Mark
MHHW - Mean High Water Mark
MLLW - Mean Low Water Mark
ROW - Right of Way

Conceptual: For Illustriative Purposes Only

Notes
1. The shoreline jurisdiction extends both landward and waterward of the OHWM.

0' 10' 20'

Source: CollinsWoerman

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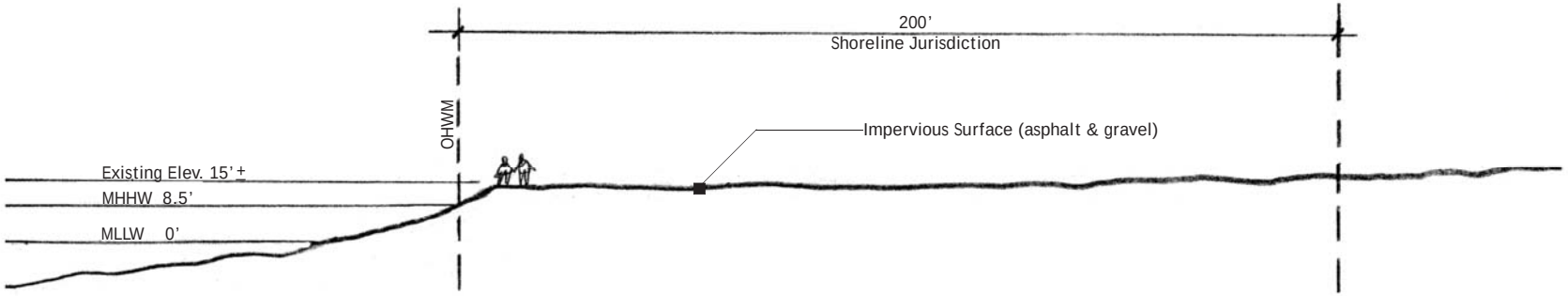
Figure 2-17
Section A
Existing Conditions

New Whatcom
Redevelopment EIS



OHWM - Ordinary High Water Mark
MHHW - Mean High Water Mark
MLLW - Mean Low Water Mark
ROW - Right of Way

Conceptual: For Illustriative Purposes Only

Notes
1. The shoreline jurisdiction extends both landward and waterward of the OHWM.

0' 10' 20'

Source: CollinsWoerman

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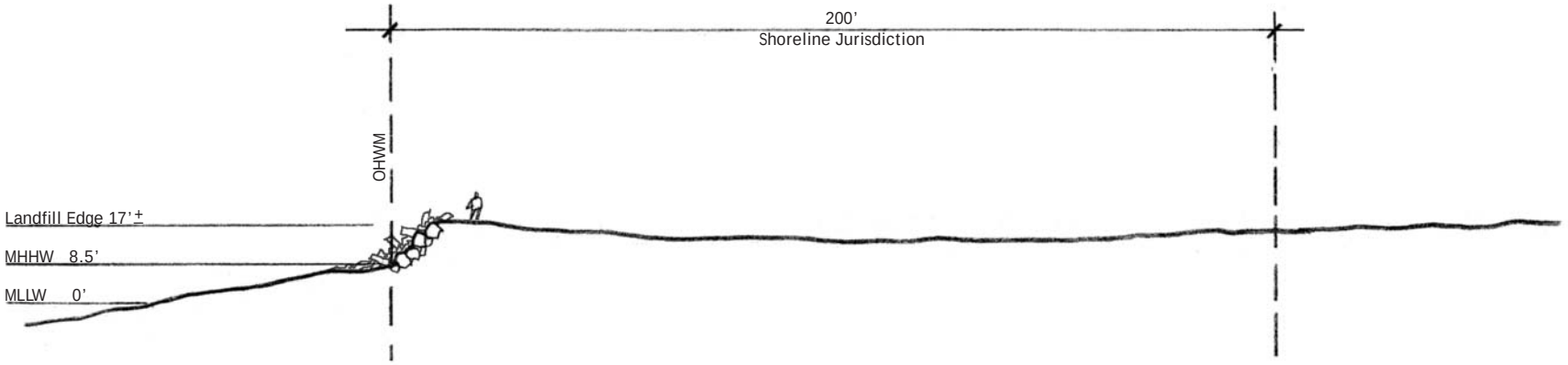
Figure 2-18
Section B
Existing Conditions

New Whatcom
Redevelopment EIS



OHWM - Ordinary High Water Mark
MHHW - Mean High Water Mark
MLLW - Mean Low Water Mark
ROW - Right of Way

Notes
1. The shoreline jurisdiction extends both landward and waterward of the OHWM.

0' 10' 20'

Conceptual: For Illustriative Purposes Only

Source: CollinsWoerman

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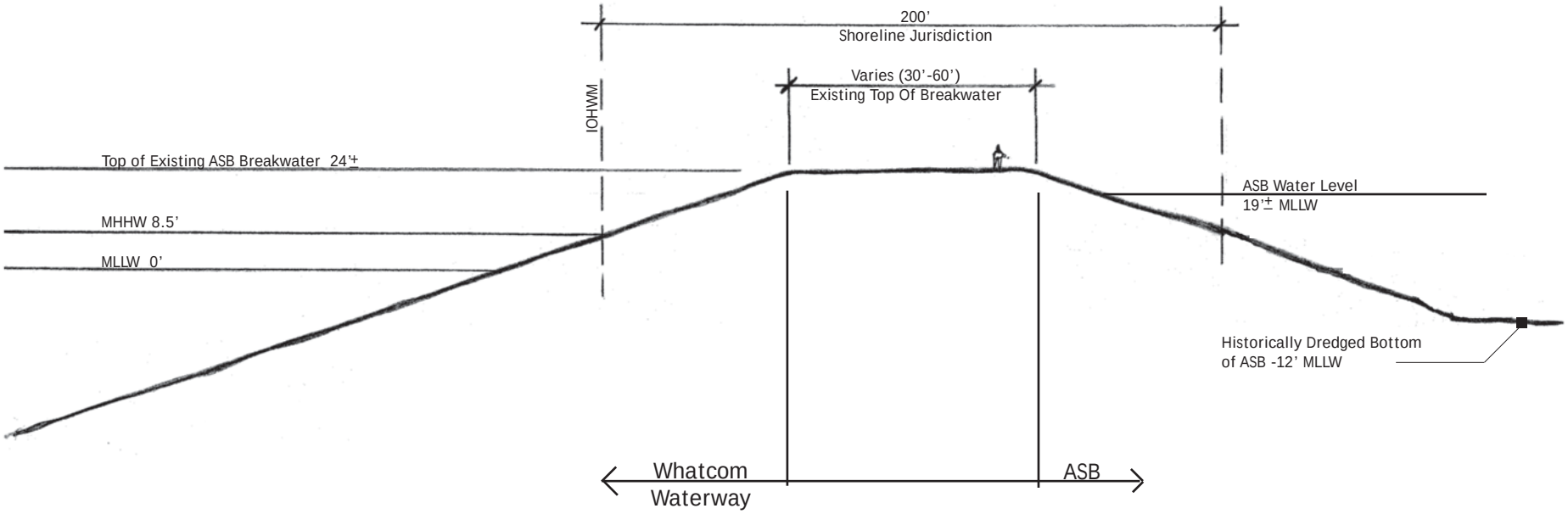
Figure 2-19
Section C
Existing Conditions

New Whatcom
Redevelopment EIS



OHWM - Ordinary High Water Mark
MHHW - Mean High Water Mark
MLLW - Mean Low Water Mark
ROW - Right of Way

Conceptual: For Illustriative Purposes Only

Notes
1. The shoreline jurisdiction extends both landward and waterward of the OHWM.

0' 10' 20'

Source: CollinsWoerman

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Figure 2-20
Section D
Existing Conditions

New Whatcom
Redevelopment EIS

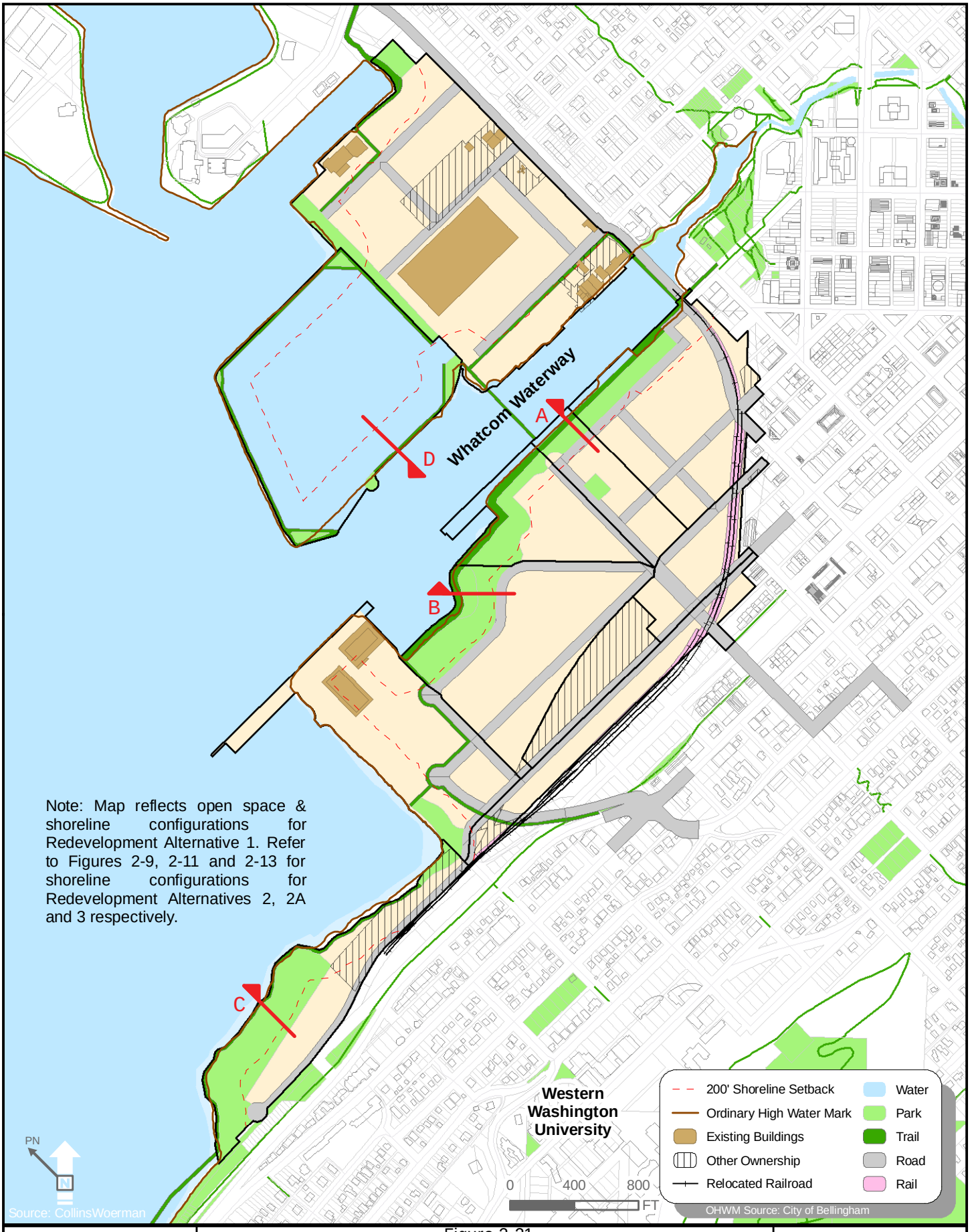

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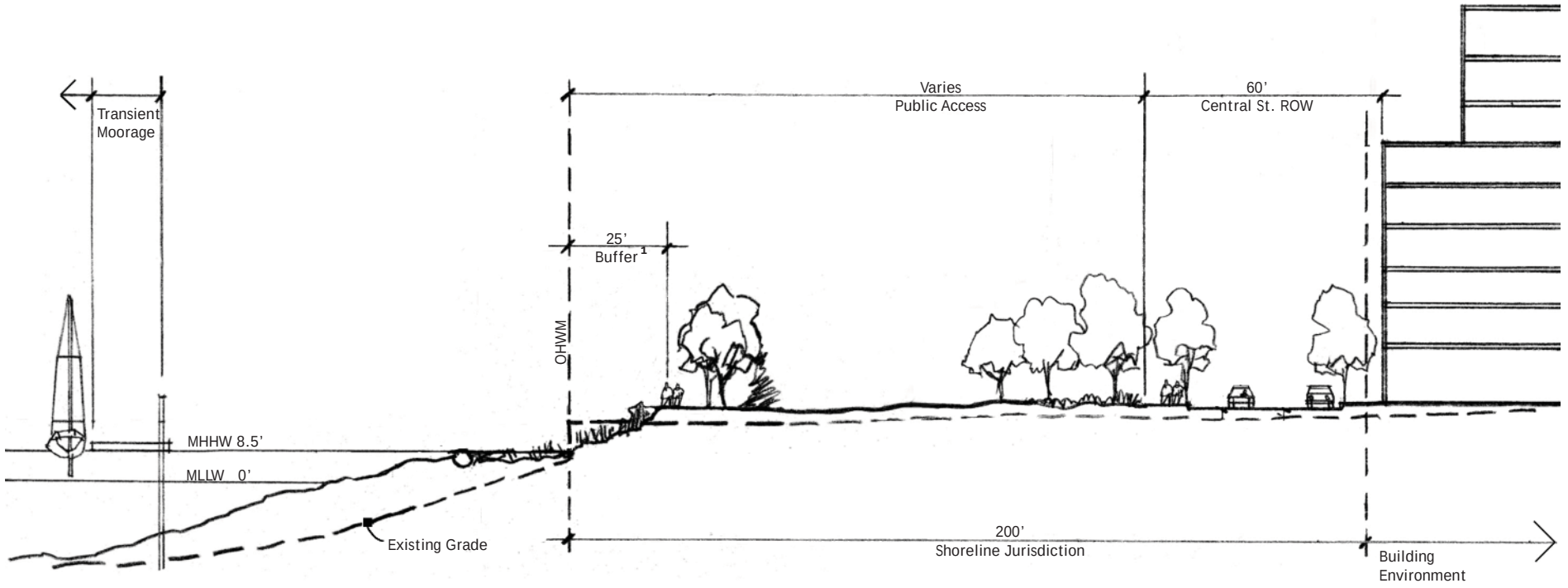
Figure 2-21
Shoreline Cross Section Locations
Redevelopment Alternatives

New Whatcom Redevelopment EIS



OHWM - Ordinary High Water Mark
MHHW - Mean High Water Mark
MLLW - Mean Low Water Mark
ROW - Right of Way

Conceptual: For Illustriative Purposes Only

Notes
1. Based upon proposed minimum SMP, 25' buffer could be required.
2. The shoreline jurisdiction extends both landward and waterward of the OHWM.

0' 10' 20'

Source: CollinsWoerman

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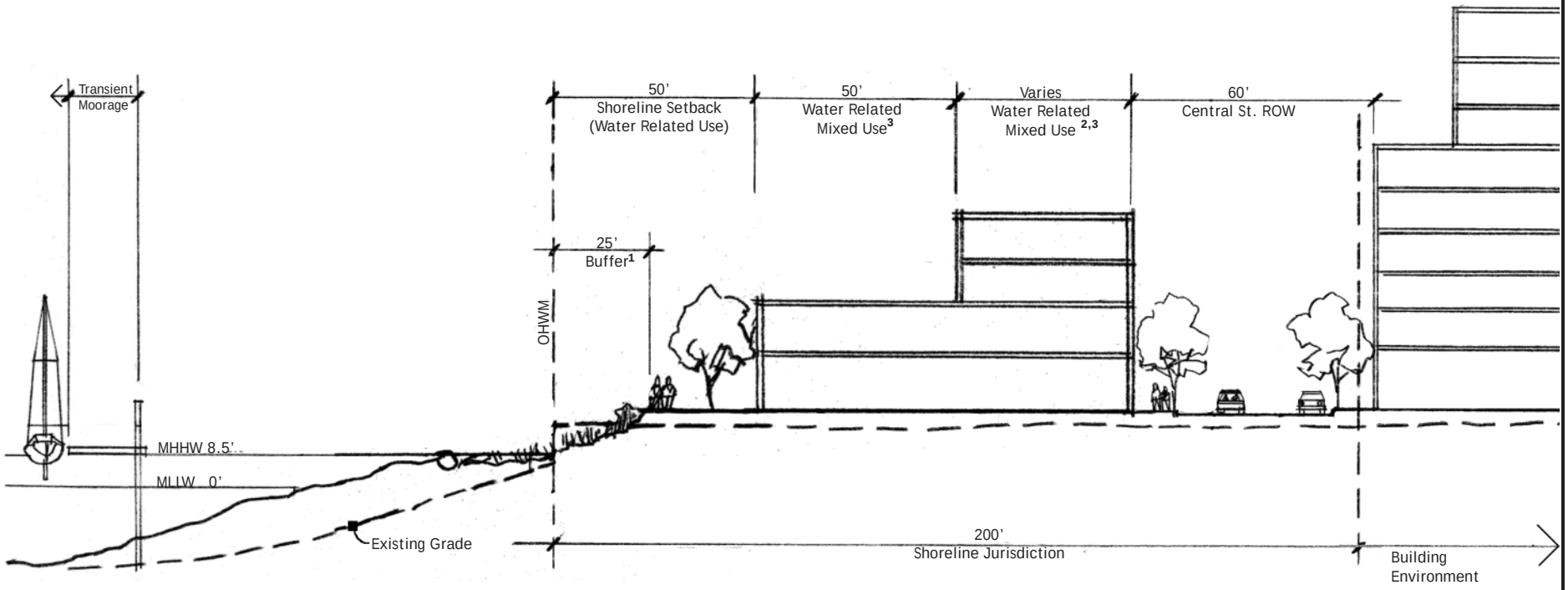
Figure 2-22
Section A
Alternative 1: 2026

New Whatcom
Redevelopment EIS



Notes

1. Based upon proposed minimum SMP, 25' buffer could be required.
2. Based upon proposed minimum SMP, water related uses within shoreline jurisdiction could be 35' in height outright (50' with view analysis).
3. Based upon proposed minimum SMP, water related uses within this area are limited to 25' maximum height, plus one-foot additional height for each additional two-feet of setback beyond the initial 50' shoreline setback.
4. The shoreline jurisdiction extends both landward and waterward of the OHWM.

0' 10' 20'

OHWM - Ordinary High Water Mark
MHHW - Mean High Water Mark
MLLW - Mean Low Water Mark
ROW - Right of Way

Conceptual: For Illustriative Purposes Only

Source: CollinsWoerman

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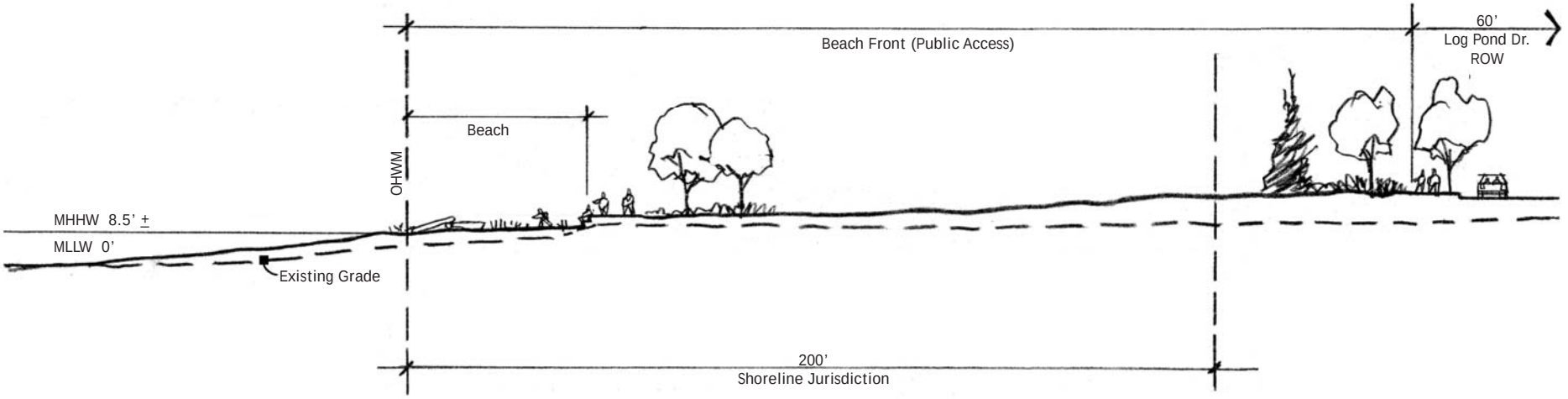
Figure 2-23
Section A
Alternative's 2, 2A & 3: 2026

New Whatcom
Redevelopment EIS



OHWM - Ordinary High Water Mark
MHHW - Mean High Water Mark
MLLW - Mean Low Water Mark
ROW - Right of Way

Conceptual: For Illustriative Purposes Only

Notes
1. The shoreline jurisdiction extends both landward and waterward of the OHWM.

0' 10' 20'

Source: CollinsWoerman

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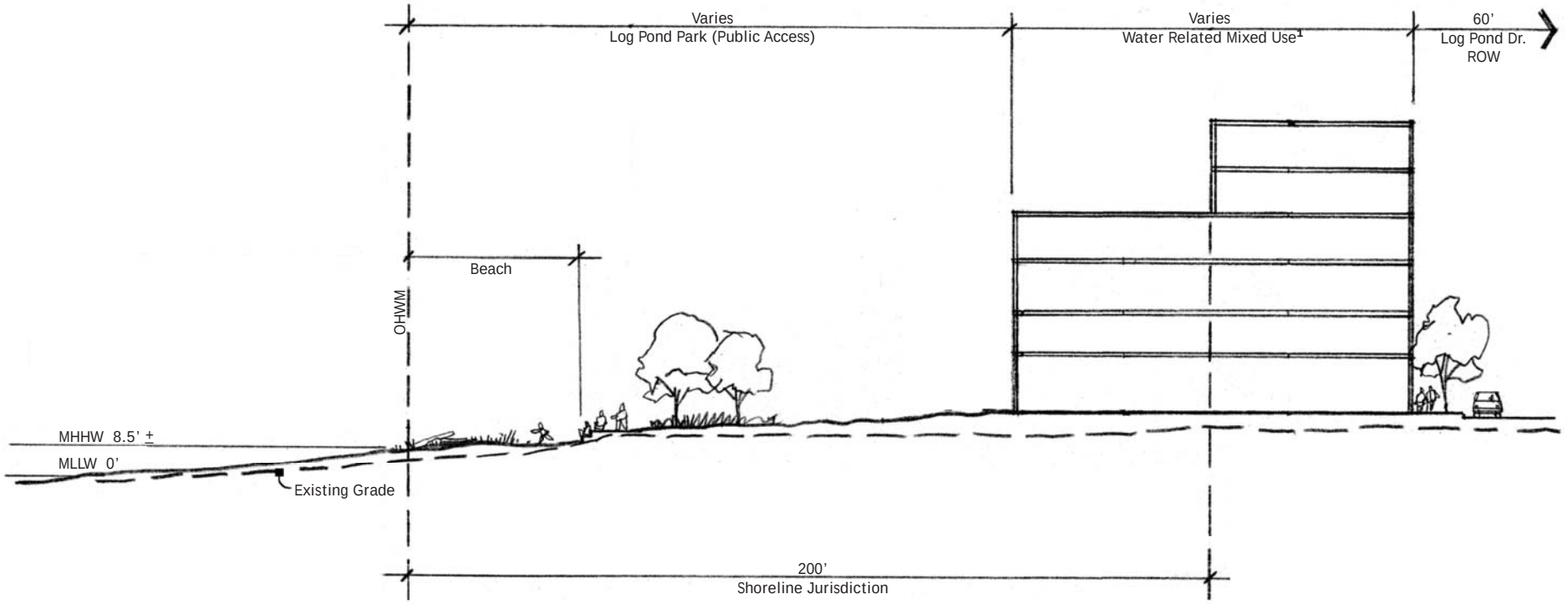
Figure 2-24
Section B
Alternative 1: 2026

New Whatcom
Redevelopment EIS



OHWM - Ordinary High Water Mark
MHHW - Mean High Water Mark
MLLW - Mean Low Water Mark
ROW - Right of Way

Conceptual: For Illustriative Purposes Only

Notes
1. Based upon proposed minimum SMP, water related uses within shoreline jurisdiction could be 35'in height outright (50' with view analysis).
2. The shoreline jurisdiction extends both landward and waterward of the OHWM.

0' 10' 20'

Source: CollinsWoerman

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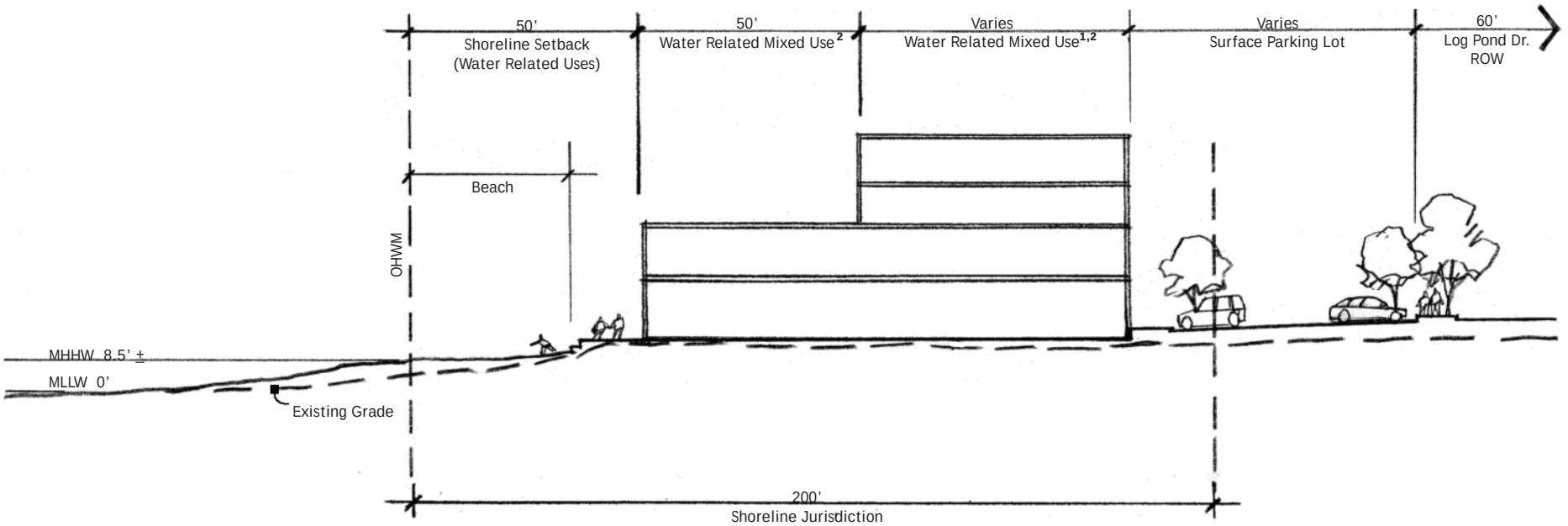
Figure 2-25
Section B
Alternative 2 & 2A: 2026

New Whatcom
Redevelopment EIS



Notes
1. Based upon proposed minimum SMP, water related uses within shoreline jurisdiction could be 35'in height outright (50' with view analysis).
2. Based upon proposed minimum SMP, water related uses within this area are limited to 25' maximum height, plus one-foot additional height for each additional two-feet of setback beyond the initial 50' shoreline setback.
3.The shoreline jurisdiction extends both landward and waterward of the OHWM.

OHWM - Ordinary High Water Mark
MHHW - Mean High Water Mark
MLLW - Mean Low Water Mark
ROW - Right of Way

0' 10' 20'

Conceptual: For Illustriative Purposes Only

Source: CollinsWoerman

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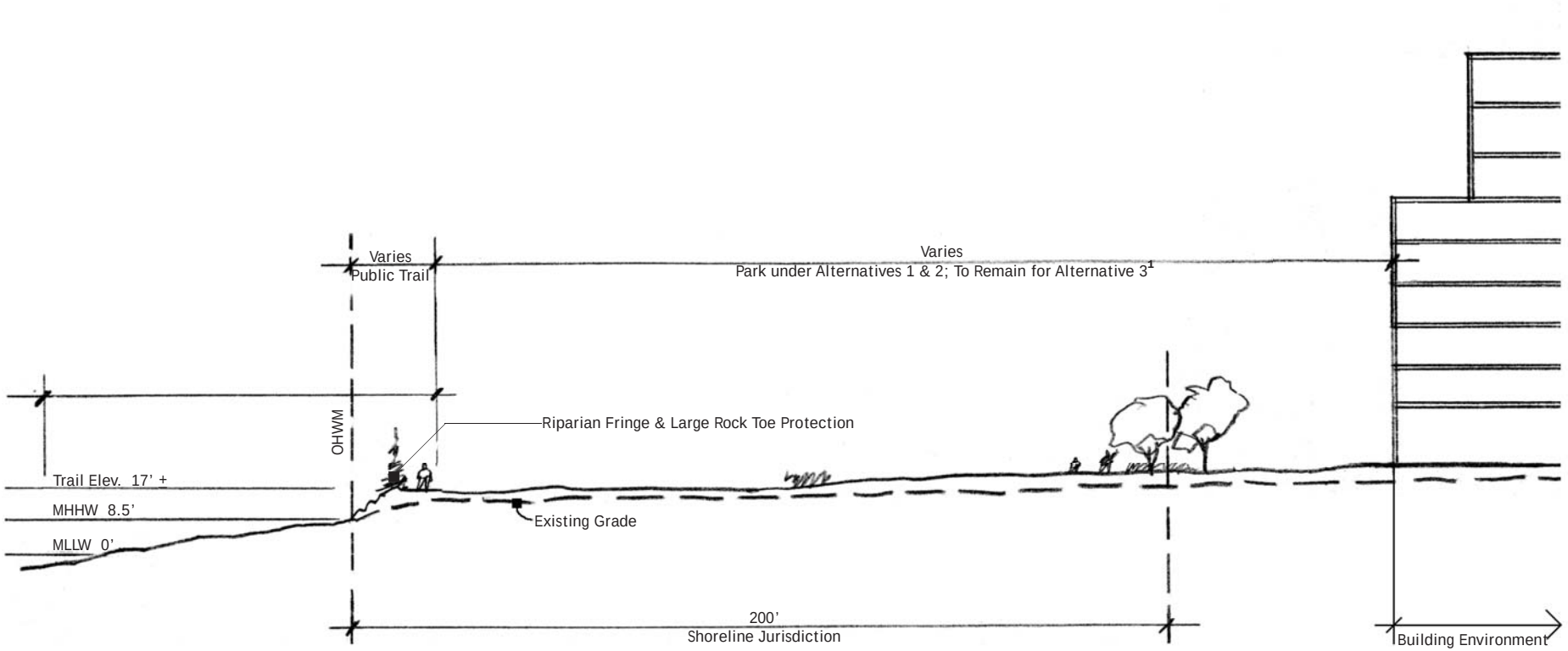
Figure 2-26
Section B
Alternative 3: 2026

New Whatcom
Redevelopment EIS



OHWM - Ordinary High Water Mark
MHHW - Mean High Water Mark
MLLW - Mean Low Water Mark
ROW - Right of Way

Notes
1. Given the extent of the Redevelopment Area 10, it is likely buildings would be setback from the OHWM (not a required SMP setback).
2. The shoreline jurisdiction extends both landward and waterward of the OHWM.

0' 10' 20'

Conceptual: For Illustriative Purposes Only

Source: CollinsWoerman

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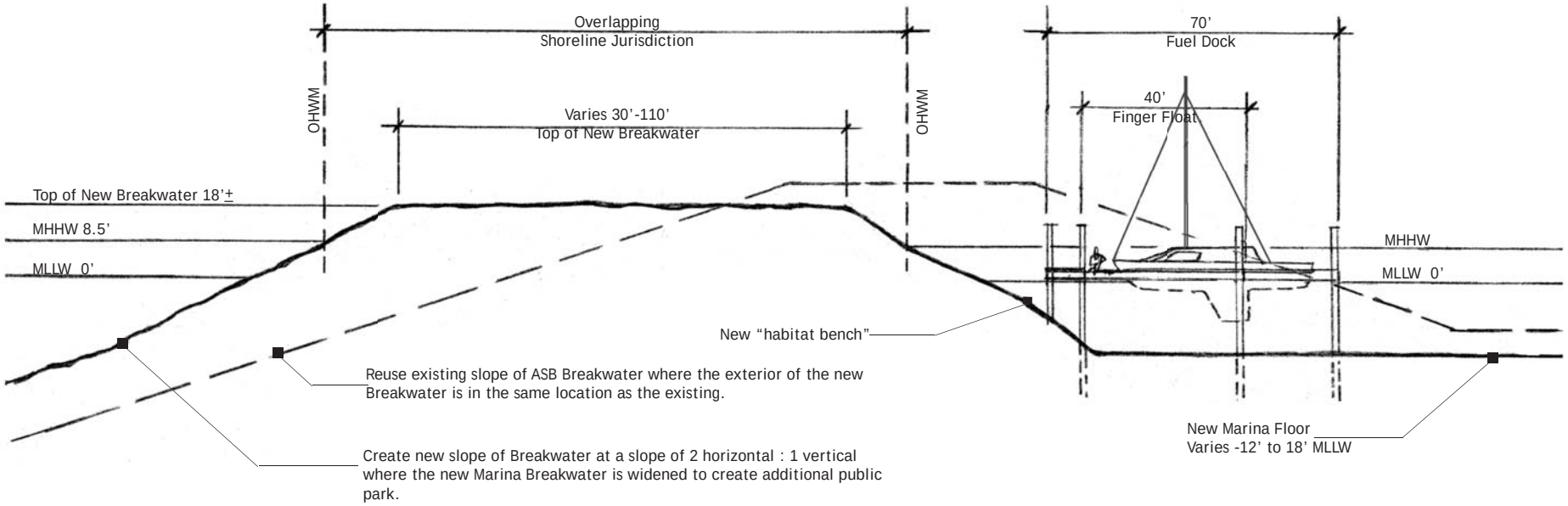
Figure 2-27
Section C
Alternative's 1, 2, 2A & 3: 2026

New Whatcom
Redevelopment EIS



OHWM - Ordinary High Water Mark
MHHW - Mean High Water Mark
MLLW - Mean Low Water Mark
ROW - Right of Way

Notes
1. The shoreline jurisdiction extends both landward and waterward of the OHWM.

0' 10' 20'

Conceptual: For Illustriative Purposes Only

Source: CollinsWoerman

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Figure 2-28
Section D
Alternative's 1, 2, 2A & 3: 2026

New Whatcom
Redevelopment EIS

Redevelopment Area 8

- The shoreline along the log pond to beach and marsh habitat would be restored.

Redevelopment Area 9

- Beach habitat at the foot of Cornwall Avenue would be restored.

Redevelopment Area 10

- Beach habitat along the extension of the foot of Cornwall Avenue would be restored.

- The riparian fringe along the Bellingham Bay shoreline would be restored.

The assumed extent and type of redevelopment within the site's shoreline environment would vary among the Redevelopment Alternatives, due primarily to the variation of the size and configuration of the assumed parks and trails. Additionally, future redevelopment within the shoreline jurisdiction is intended to be consistent with the proposed update to the regulations defined in the Shoreline Master Program, 22.110.30F – *New Whatcom Development Regulation Matrix* (Alternative Staff Recommendations) (refer to Section 3.8, **Relationship to Plans and Policies**, for discussion of the Shoreline Master Plan update). Shoreline assumptions for the Redevelopment Alternatives are summarized below.

Alternative 1

- Alternative 1 would include parks and trails along the shoreline, and would have the least assumed building redevelopment potential within the 200-foot shoreline environment (i.e. along the south shore of Whatcom Waterway). However, shoreline areas without parks or trails could be more intensely developed than under Alternative 2 and 3, due to the assumed density of Alternative 1.

- Alternative 1 includes narrow width or no trail/open space area along the south shore of the I & J Waterway, the north shore of the Whatcom Waterway and a portion of the shoreline at Redevelopment Area 9. The opportunity for redevelopment to occur near to or adjacent to these shorelines would be afforded. For example, water-dependent uses could be located adjacent to the Ordinary High Water Mark (OHWM), and non-water-dependent uses could be located to within 50 feet of the shoreline (OHWM) in these locations (water-dependent uses would have narrower buffers under the proposed SMP regulations than non water-dependent uses). Along the remaining shoreline areas where parks or trails (25 to 300 feet in width) would abut the shoreline, building redevelopment within the 200-foot shoreline jurisdiction under Alternative 1 would be limited and would be assumed not to be closer than 25 feet to the shoreline (OHWM).

- Consistent with the draft SMP (staff recommendations), all redevelopment in structures within the 200-foot shoreline jurisdiction would be allowed an outright maximum height up to 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. Any structures with heights over 50 feet would require approval by variance.

Alternative 2/2A

- The configuration of Alternatives 2/2A results in more assumed building redevelopment potential within the 200-foot shoreline jurisdiction than under Alternative 1, due to the lesser width of the parks/trails area provided on the south shore of the Whatcom Waterway. A majority of that shoreline would be developed as a trail corridor (25 feet to 40 feet in width) with a park area at the Log Pond (Redevelopment Area 4 and 8).

- Similar to Alternative 1, where Alternatives 2/2A assumes narrow width or no trail/open space area along the south shore of the I & J Waterway, the north side of the Whatcom Waterway, and a majority of the shoreline at Redevelopment Area 9, the opportunity for building redevelopment to occur near to or adjacent to these shorelines would be afforded.

- As described for Alternative 1, all redevelopment in structures within the 200-foot shoreline jurisdiction would be allowed an outright maximum height up to 35 feet and could be granted a maximum height up to 50 feet depending upon the results of a required view analysis depicting impacts to surrounding properties.

Alternative 3

- The area in parks and trails along the shoreline is assumed to be the least in this alternative, potentially allowing the greatest opportunity for building redevelopment within the 200-foot shoreline jurisdiction. This relates to shoreline area in Redevelopment Areas 1, 2, 3, 4, 8 and 10.

- Similar to Alternatives 2/2A, this alternative assumes narrow or no park/trail area along the south shore of the I & J Waterway, the north and south sides of the Whatcom Waterway, and a majority of the shoreline at Redevelopment Area 9. At those locations water-dependent uses could be located adjacent to the Ordinary High Water Mark (OHWM), and non-water-dependent uses could be located to within 50 feet of the shoreline (OHWM).

Pedestrian Bridge Over Whatcom Waterway

The planned trail systems in Area 1 north of the Whatcom Waterway (including a trail along Hilton Avenue and a trail within the open space buffer along the north site of the Whatcom Waterway) would be linked to the planned trail system south of the Whatcom Waterway via a pedestrian bridge over the Whatcom Waterway; for environmental review purposes, this bridge is assumed to be provided by 2016 under Alternative 1 and by 2026 under Alternatives 2/2A (under Alternative 3, no pedestrian bridge is assumed). Generally aligned with the Laurel Street right-of-way, this pedestrian bridge would be approximately 12 to 20 feet in width and would have a span of approximately 500 feet; it is assumed that no new piers or in-water structures would be required for the bridge. Because a bridge height of a minimum of 50-feet above the OHWM is not considered achievable due to American Disabilities Act bridge slope requirements, a segment of the bridge would open (vertically or horizontally) to allow passage of large boats. The bridge would be designed to be as transparent as feasible to minimize interference with views.

Roadway System

For environmental review purposes, the combination and timing of new roadway improvements vary among the Redevelopment Alternatives (Alternatives 1 through 3); the overall concept for new roadway connections to the existing City street network includes:

- For Redevelopment Area 1, **F Street** would be the primary site access corridor, service street and truck route. Access to Area 1 via extensions of **C Street** and **Hilton Avenue** would also be provided.

- For the redevelopment areas south of the Whatcom Waterway (Areas 2 through 10), there would be several primary access point connections between the site and the existing City roadway network, including (depending on the alternative):

    - Improvements at **Central Avenue** to allow access to Chestnut Street (Area 2)
    - New bridge connection at **Bay Street** (Area 2)
    - New bridge connection at **Commercial Street** (Area 5)
    - New bridge connections at **Cornwall Avenue** and **Laurel Street** (Area 7)
    - New fly-over at **Wharf Street** to provide connection to the intersection of N State and N Forest Street (Area 9).

Extensions of the primary site access points (listed above) into the site, along with other internal roadway improvements, would be provided to support internal site vehicle circulation as well as connections to the existing City network. **Table 2-6** summarizes the roadway improvement assumptions for each of the Redevelopment Alternatives (Alternatives 1 through 3) for the years 2016 and 2026. **Figures 2-29** through **2-32**, illustrate the assumed roadway systems for the years 2016 and 2026 (refer to Section 3.12, **Transportation**, of this Draft EIS for more information).

Table 2-6
ROADWAY IMPROVEMENT ASSUMPTIONS

Alternative/Assumptions	Road Improvements by 2016	Road Improvements by 2026
Alternative 1-High Density	• At grade improvement of F St., C St. and Hilton Ave to Area 1. • Develop internal crossroads in Area 1 • At grade improvement of Laurel St. (from Cornwall Ave. to Waterway). • Extend Cornwall Ave. at-grade to Area 10. • Upgrade Central Ave. wharf.	• At grade improvement of Maple St. between Central St. and Commercial St. • Develop Commercial St. Bridge and at-grade extension of Commercial St. to Oak St. • Develop Wharf St. fly-over. • Develop Log Dr. and extend to Oak St. – completes 5-leg intersection (Laurel St., Commercial St. and Log Pond Dr.)

Table 2-6
(cont'd)

Alternative/Assumptions	Road Improvements by 2016	Road Improvements by 2026
	• At grade extension of Central Ave. to Laurel St. • Develop Bay St. Bridge and at-grade extension to Laurel St. • Develop Laurel Bridge • Develop Cornwall Bridge	
Alternative 2-Medium	• At-grade improvement of F St., C St. and Hilton Ave to Area 1. • Develop internal crossroads in Area 1. • At-grade improvement of Laurel St. (from Cornwall Ave. to Waterway) • Extend Cornwall Ave. at-grade to Area 10 • Upgrade Central Ave. wharf • At-grade extension of Central Ave. to Laurel St. • Develop Bay St. Bridge and at-grade extension to Laurel St. • Develop Laurel St. Bridge • Close Cornwall Ave. at railroad between Maple St. and Oak St.	• At grade improvement of Maple St. between Central St. and Commercial St. • Develop Commercial Bridge • At grade extension of Commercial St. to Oak St. • At-grade Bay from Laurel to Oak • At-grade extension of Oak St. between Cornwall Ave and Bay St.
Alternative 2A-Medium (Railroad does not move)	• At-grade improvement of F St., C St. and Hilton Ave to Area 1. • Develop internal crossroads in Area 1. • At-grade improvement of Laurel St. (from Cornwall	• At-grade extension of Maple St. between Central and Commercial St. • Develop Laurel St. Bridge and Cornwall Ave. Bridge • Develop Commercial St. Bridge

Table 2-6
(cont'd)

Alternative/Assumptions	Road Improvements by 2016	Road Improvements by 2026
	Ave. to Waterway) • Extend Cornwall Ave. at-grade to Area 10 • Upgrade Central Ave. wharf • At-grade extension of Central Ave. to Laurel St. • Develop Bay St. Bridge and at-grade extension to Laurel St.	• At-grade extension of Commercial St. to Oak St. • At-grade extension of Bay St. from Laurel St. to Oak St. • At-grade extension of Oak St. between Cornwall Ave. and Bay St.
Alternative 3-Low Density (Railroad does not move)	• At-grade improvement of F St., C St. and Hilton Ave to Area 1. • Develop internal crossroads in Area 1. • At-grade improvement of Laurel St. (from Cornwall Ave. to Waterway) • Extend Cornwall Ave. at-grade to Area 10	• At-grade extension of Maple St. between Central St. and Commercial St. • Upgrade Central Ave. wharf • At-grade extension of Central Ave. to Laurel St. • Develop Bay Bridge and at-grade extension to Oak St. • At-grade extension of Oak St. between Bay St. and Cornwall Ave. • Realign Cornwall and Oak/Wharf intersection near rail crossing.

Source: CollinsWoerman, 2007

Roadway rights-of-way would be assumed to be 60 feet in width for all public roadways on the site, except for Laurel Street that would have a right-of-way width of 100-feet and Cornwall Avenue, where improved, that would have a right-of-way width of 80-feet. It is assumed that the 60-foot right-of-way roadways would contain two drive lanes (one lane in each direction), sidewalks, bike lanes and landscape strip (potentially containing bioretention features). The 80-foot wide right-of-way for Cornwall Avenue would contain four drive lanes (two in each direction), landscaped median and sidewalks with street trees. The 100-foot wide right-of-way for Laurel Street would contain four drive lanes (two in each direction), landscaped median, sidewalks, bike lanes and planting strips on either side. See **Figure 2-33 through 2-35** for conceptual cross-sections illustrating the onsite roadways.

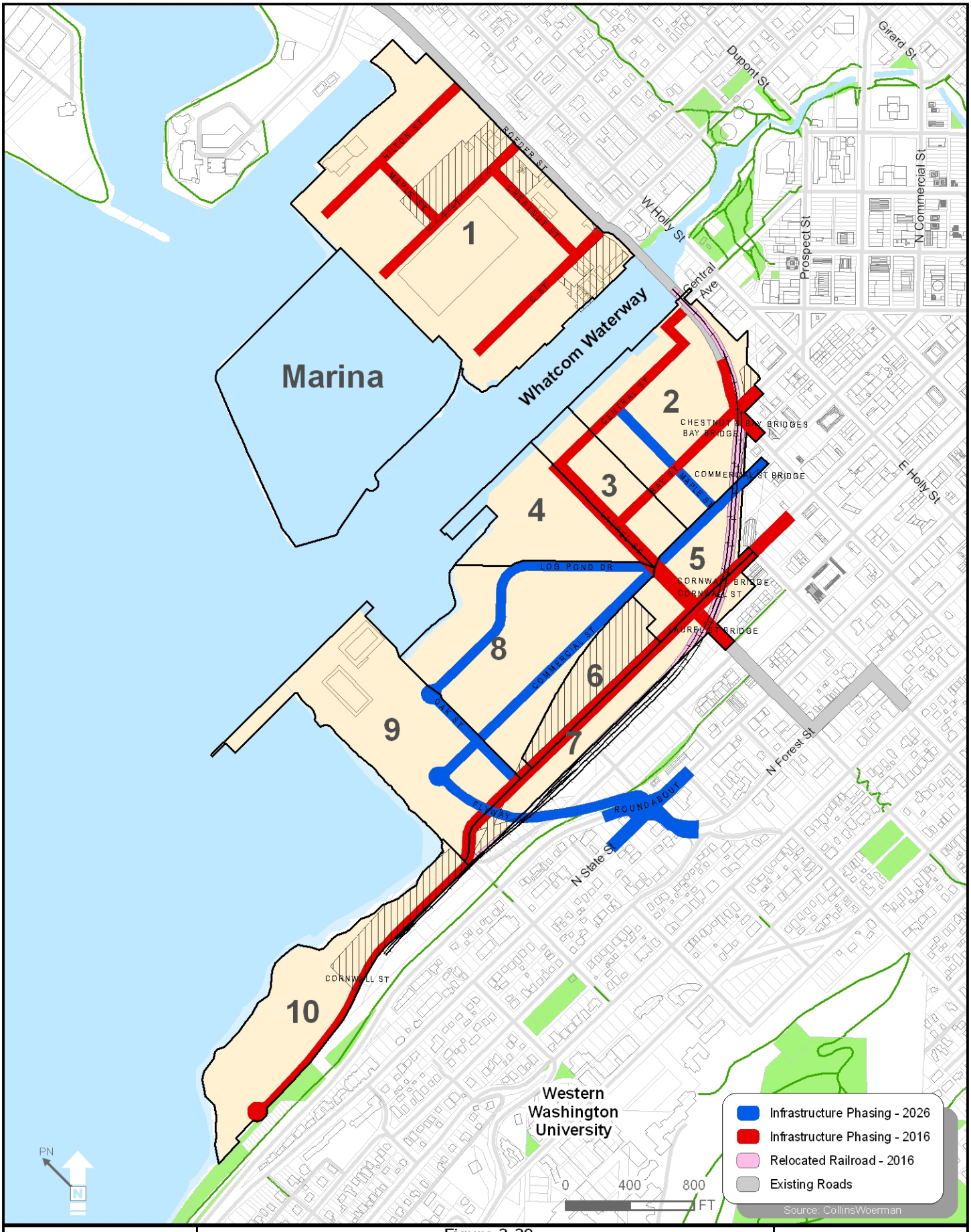

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Figure 2-29
Roadway Infrastructure Phasing
Alternative 1 - Higher Density Alternative

New Whatcom Redevelopment EIS

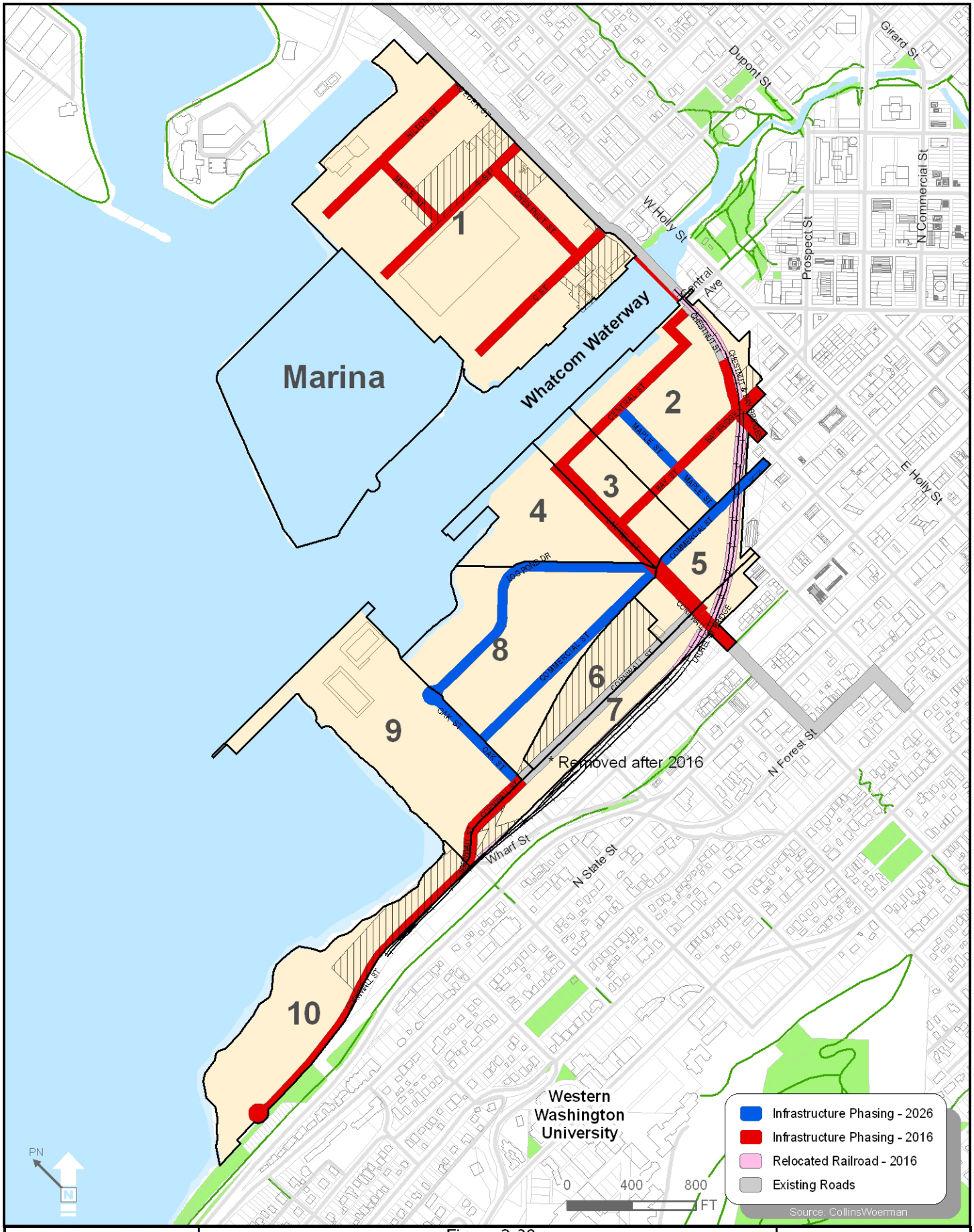

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Figure 2-30
Roadway Infrastructure Phasing
Alternative 2 - Medium Density Alternative

New Whatcom Redevelopment EIS

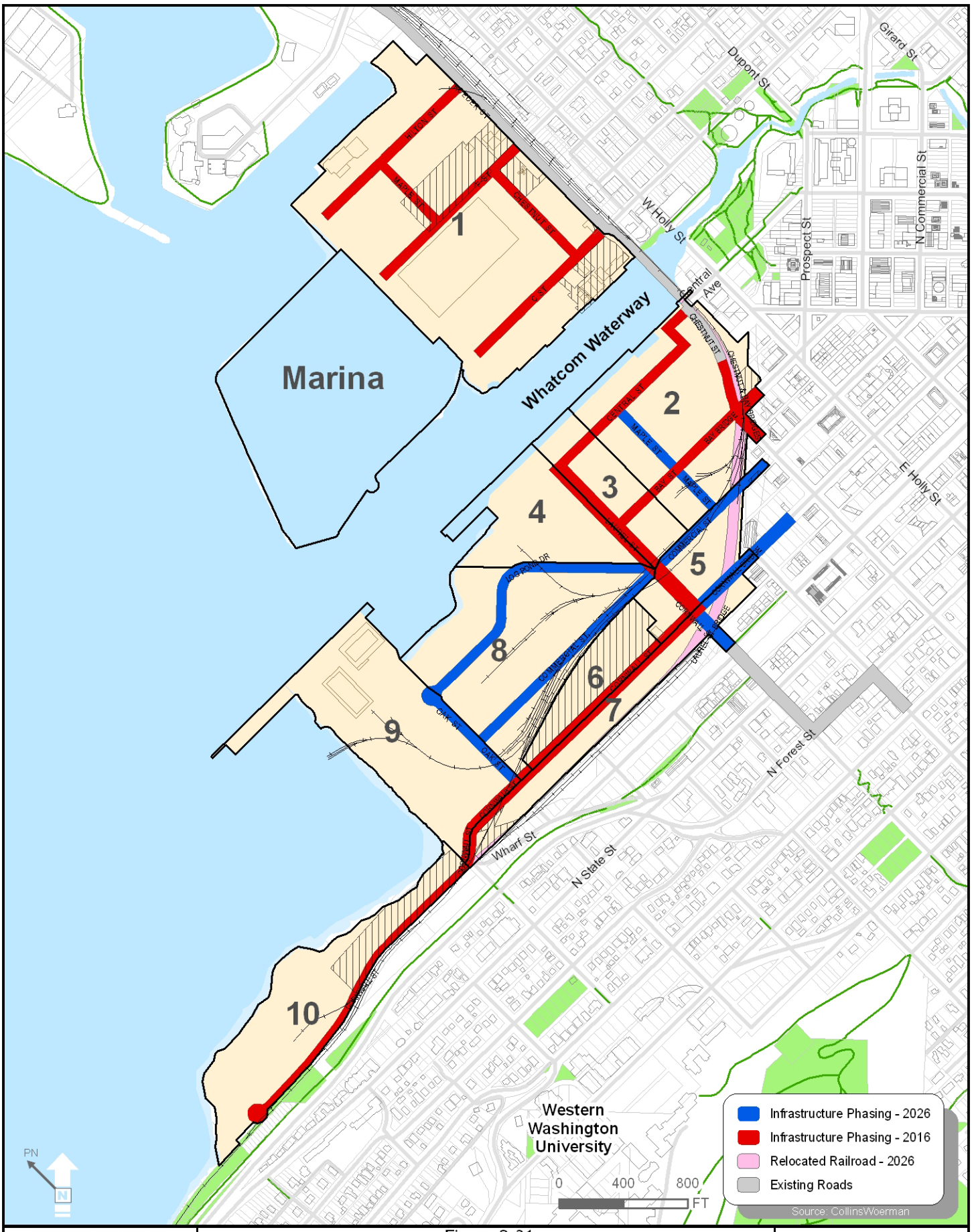

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Figure 2-31
Roadway Infrastructure Phasing
Alternative 2A - Medium Density Alternative

New Whatcom Redevelopment EIS

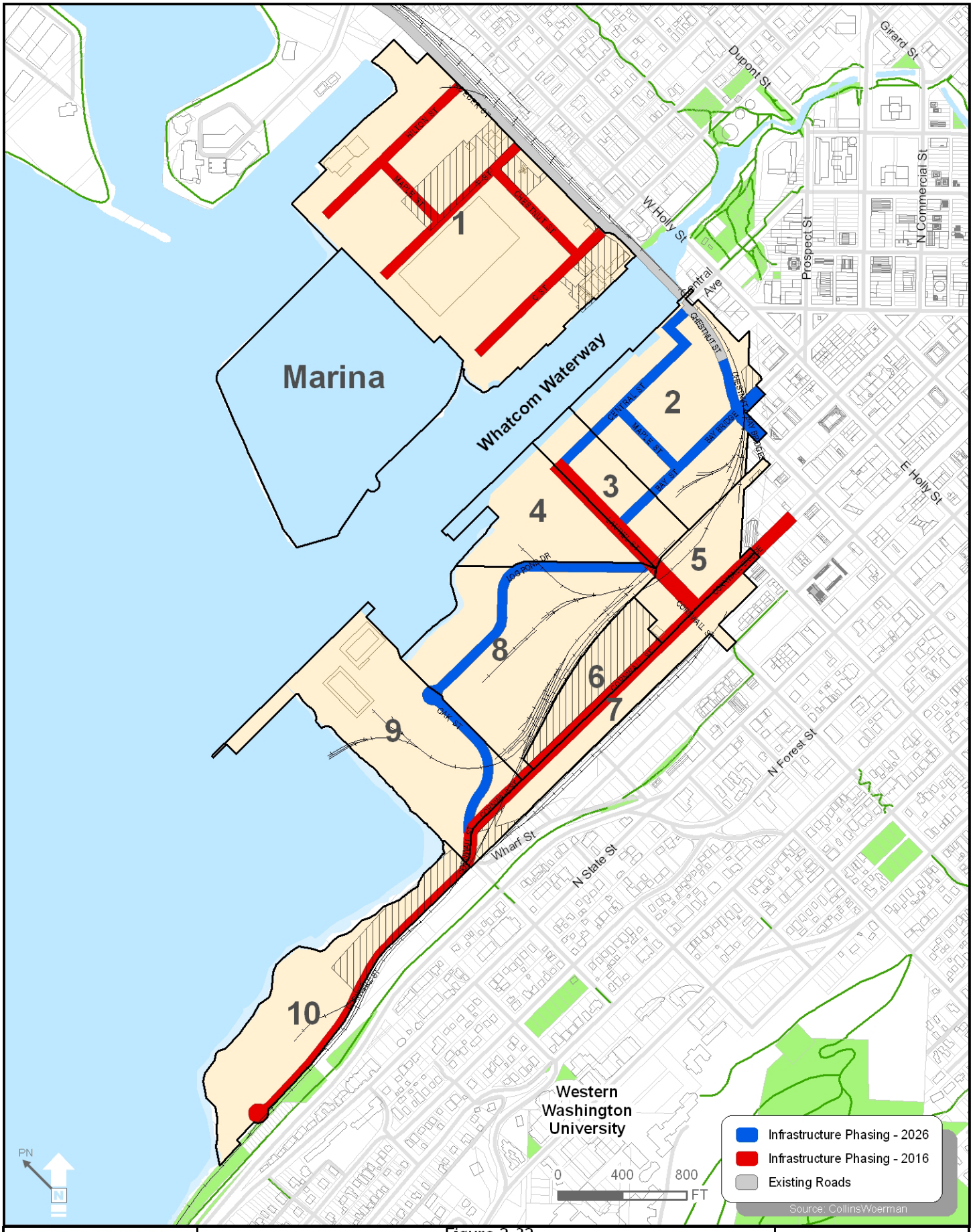

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Figure 2-32
Roadway Infrastructure Phasing
Alternative 3 - Lower Density Alternative

New Whatcom Redevelopment EIS

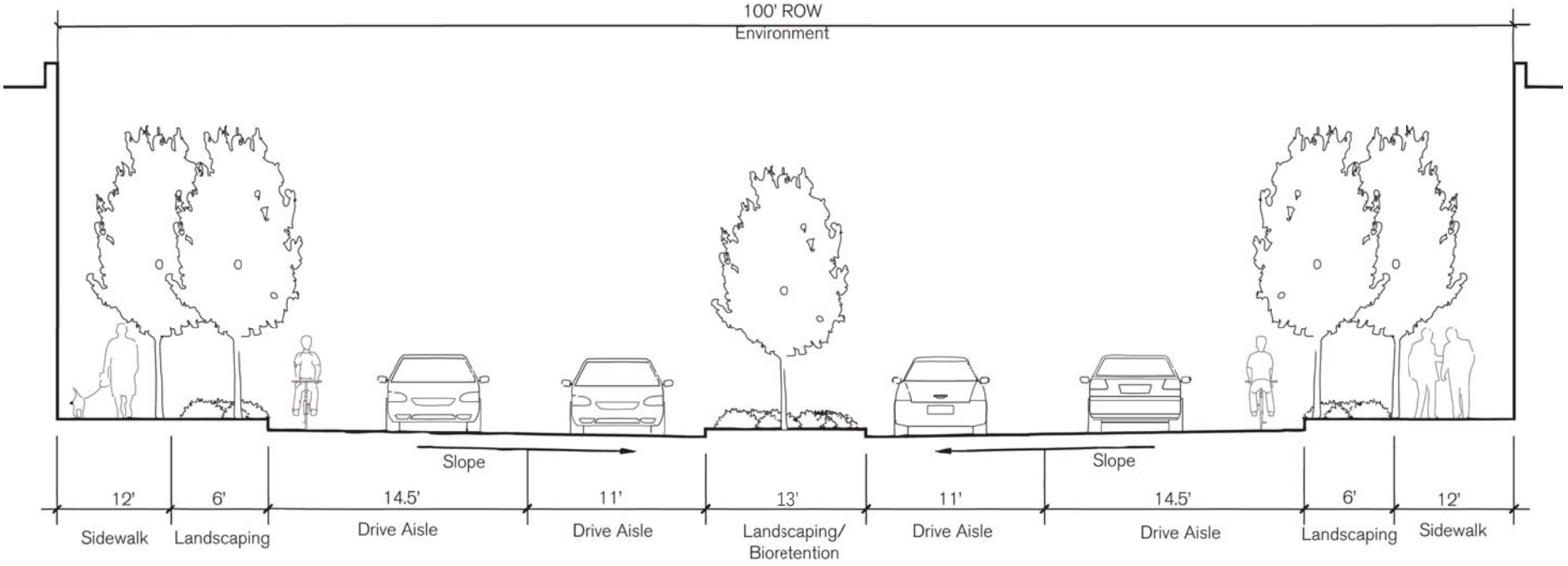

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Figure 2-33
100' ROW (Laurel)
Alternative 1, 2, 2A, & 3

New Whatcom
Redevelopment EIS

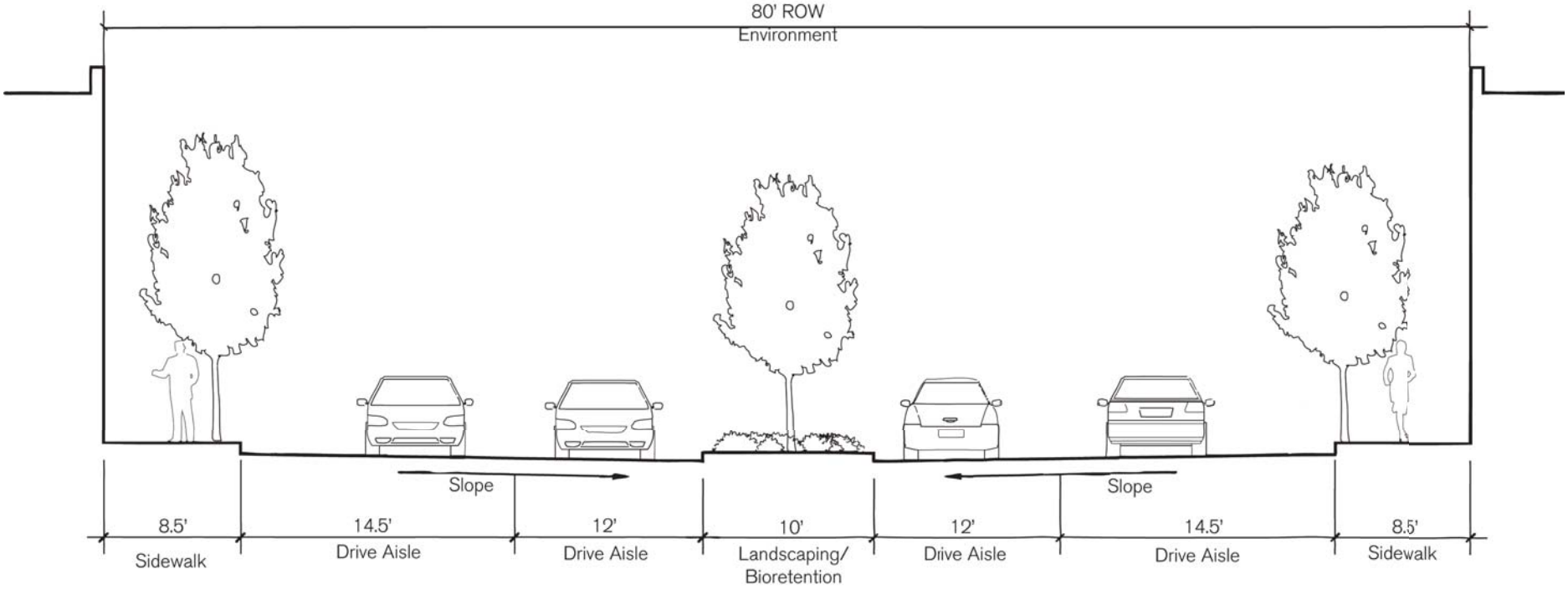

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Figure 2-34
80' ROW (Cornwall where improved)
Alternative 1, 2, 2A, & 3

New Whatcom
Redevelopment EIS

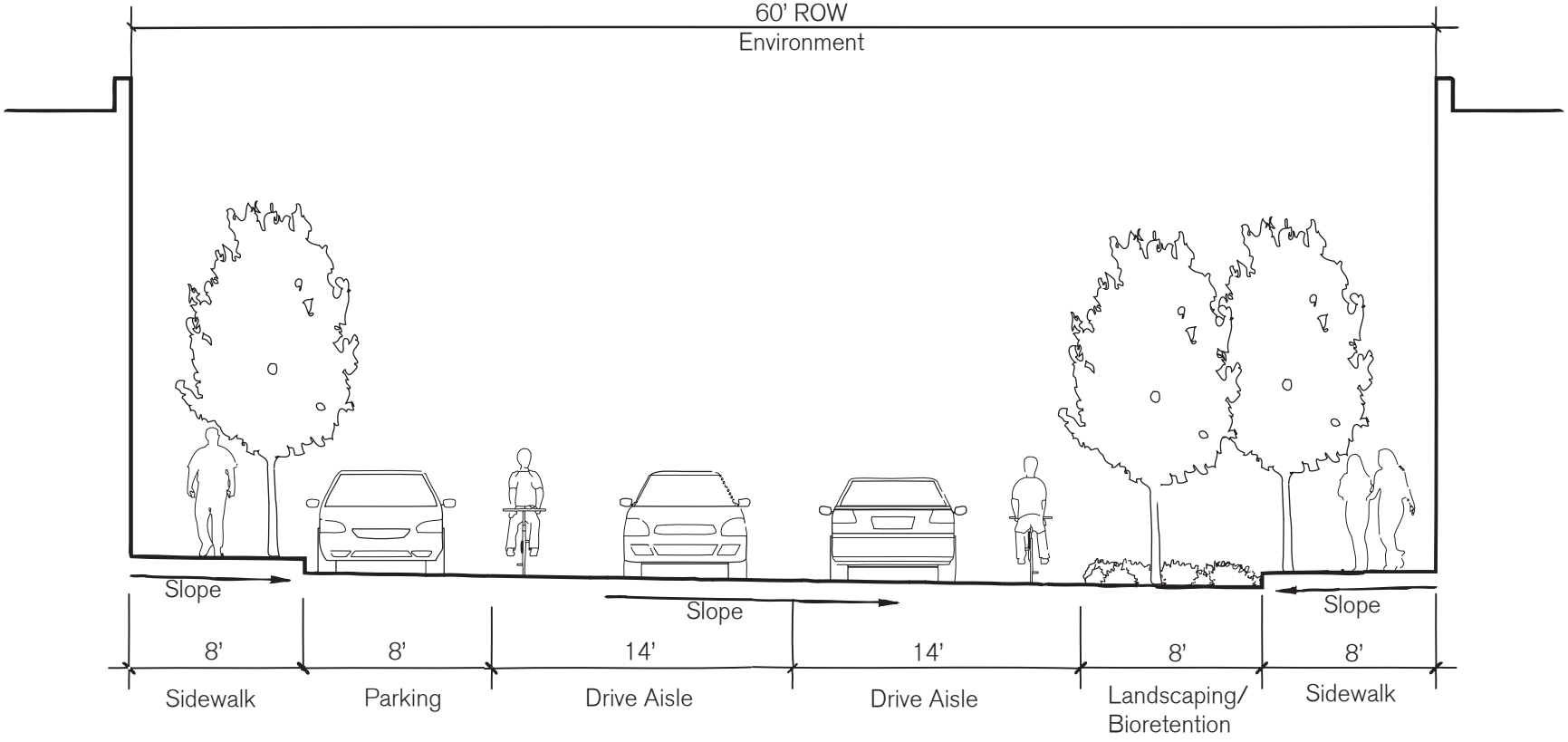

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Figure 2-35
Typical 60' ROW
Alternatives 1, 2, 2A, & 3

New Whatcom
Redevelopment EIS

Affordable Housing Provisions

The Port of Bellingham, in coordination with the City of Bellingham and Whatcom Housing Authority, would include affordable housing guidelines for incorporation into the Master Development Plan for New Whatcom. Specific provisions for affordable housing would be contained in the Development Regulations for the New Whatcom site. It is possible that the Whatcom Housing Authority would monitor housing on the site relative to the affordable housing standards (refer to Section 3.9, **Population, Employment and Housing,** of Chapter 3 of this Draft EIS for more information).

Existing Buildings

The site currently contains numerous buildings associated with Georgia-Pacific's past activities, Port of Bellingham operations, Puget Sound Energy facilities and other marine and/or industrial uses. As described earlier in this chapter, certain buildings associated with Georgia-Pacific's mill operations in Redevelopment Areas 2, 3 and 4 of the site have been, or are planned to be, demolished consistent with the Demolition Plan included as part of the Port/Georgia-Pacific Purchase and Sale Agreement. Upon completion of planned building demolition by Georgia-Pacific, a total of 36 buildings will remain on the site. This condition (subsequent to demolition) is considered the "existing condition" for purposes of analysis of impacts in this Draft EIS.

The existing buildings to remain after demolition by Georgia Pacific are displayed in **Figure 2-4** and include 12 buildings in Area 1 (buildings 2, 2A, 3, 4, 10, 11, 12, 14A, 14B, 9A, 9B and B), six buildings in Area 2 (buildings 7, 14, 15, 37, 49 and 51), two buildings in Area 3 (buildings 13 and 17), three buildings in Area 4 (buildings 8, 9 and 12A); two buildings in Area 5 (buildings 9 and 50), one building in Area 6 (PSE facility), one building in Area 7 (building 18), four buildings in Area 9 (buildings G, H, I and J), and five buildings in Area 10 (buildings E1, E2, E3, E4 and E5).

For environmental review purposes (assessing potential maximum environmental impact conditions), it is assumed in this Draft EIS that all but 12 of the 36 existing buildings could be removed under the Redevelopment Alternatives, including all of the former Georgia-Pacific buildings in Redevelopment Areas 2, 3 and 4; refer to **Figure 2-36** for an illustration of the buildings assumed to remain on the site with redevelopment under Alternatives 1 through 3. The existing buildings assumed to remain on the site include 10 buildings in Area 1 (including the Tissue Warehouse-building 11, along with buildings B, 2, 2A, 3, 4, 10, 12, 14A and 14B) and the two warehouse buildings associated with the Shipping Terminal in Area 9 (buildings I and J). Refer to Section 3.11, **Historic Resources** in Chapter 3, for more detail.

Although for environmental review purposes it is assumed that up to 24 existing buildings could be removed, actual decisions regarding reuse or removal of onsite buildings (those that will remain after Georgia-Pacific demolition plans) would be made by the Port and City in the future in conjunction with site developers. The Port intends to explore feasible opportunities for adaptive reuse of such existing buildings with consideration of structural, economic, market and land use factors. Refer to Section 3.11, **Historic Resources** in Chapter 3, for more detail.

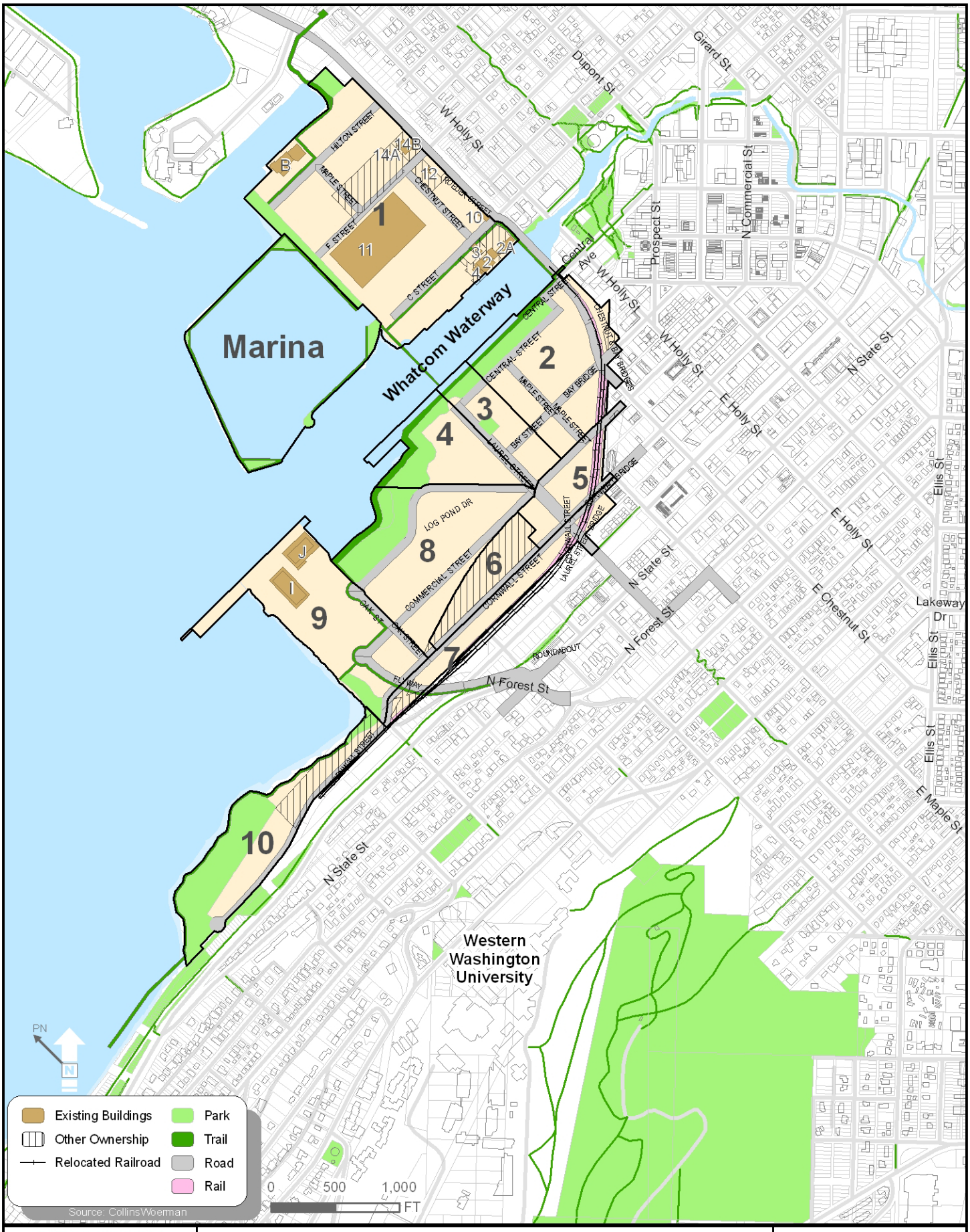

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Figure 2-36
Buildings Assumed to Remain

New Whatcom Redevelopment EIS

Broadway Pedestrian Connection

To facilitate a pedestrian connection between the trails and park/open space features assumed for Redevelopment Area 1 and the area to the east, across the rail tracks and Roeder Avenue, a pedestrian overpass is planned for the future. Assumed under Alternative 1 only, this pedestrian overpass would span the railroad tracks and Roeder Avenue to connect with the western terminus of Broadway Avenue at the top of the bluff. Since plans for this potential connection have not been defined for environmental review purposes at this time, this project would not be designated as a Planned Action project and additional environmental review could be required at the time permit applications are submitted to the City in the future (refer to **Section 2.10** for more information).

Development Phasing

Construction Phasing - Future redevelopment assumed under the Redevelopment Alternatives (Alternatives 1-3) would consist of three primary activities: 1) demolition of existing buildings and paved areas and removal, replacement or abandonment of existing utilities; 2) construction of new major site infrastructure, including primary roadways, utilities and parks/trails; and, 3) construction of new buildings and associated parking.

The sequencing of these construction activities would depend on the specific extent and timing of any early action infrastructure projects such as certain primary new roadways and 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, subject to the stipulations of the approved Development Agreement and any subsequent third party developer funding agreements.

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

It is assumed that most of the roadways in the lower-elevation portions of the site would be raised via imported fill material approximately 3 to 6 feet above the existing site grade; this 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 of long-term sea-level rise on site and reductions in subsurface excavation work within the areas of completed site remediation. (See Section 3.5, **Environmental Health, for** more detail regarding remediation plans for the New Whatcom site.)

Because site redevelopment would occur over an extended period of time, utility systems would be integrated with the phased redevelopment of the primary roadway network. These utilities include water, sewer, stormwater and electrical/natural gas systems to support redevelopment on the site. Temporary stormwater systems could be established and operated until establishment of the permanent systems (refer to discussion of Stormwater System earlier in this Chapter and Section 3.3, **Water Resources**, Chapter 3 in this Draft EIS, for more information).

Environmental Protection Standards- As discussed in Section 3.5, **Environmental Health** in Chapter 3, several portions of the site will undergo site cleanup actions to remediate soil and groundwater contamination associated with historical uses. These cleanup actions are scheduled to take place prior to 2016, consistent with the state MTCA cleanup regulations overseen by Ecology. The completed cleanup actions will likely include engineering and institutional control requirements that would be implemented as part of site redevelopment. The general types of requirements anticipated as part of the final cleanup actions were defined prior to acquisition of the properties by the Port in 2005 based on previous environmental studies and Ecology direction. These anticipated requirements were documented as the "Environmental Protection Standards". These standards will be subject to agency oversight and public review prior to final decision-making by Ecology as part of final cleanup actions, and would then be implemented in an appropriately-phased manner as part of site redevelopment. **Section 3.5** includes a discussion of how the potential range of standards would be finalized and implemented as part of site cleanup and redevelopment under the EIS Alternatives.

Parking Strategy

During the initial stages of site redevelopment, when overall site density would be relatively low, it is assumed that the majority of onsite parking demand would be accommodated by surface parking. As redevelopment continues, and overall density on the site increases, surface lots would likely be converted to buildings and structured parking. The long-term strategy related to the redevelopment of surface parking lots allows for maximum flexibility over multiple redevelopment cycles. Reliance on structured parking over time would be greatest under Alternative 1, due to the higher overall density assumed.

2.8.3 Specific Descriptions of Alternative 1 through 3

Alternative 1 – Higher Density Alternative

Alternative 1 (see **Figures 2-6 and 2-7**) includes the highest level of density, the most extensive infrastructure network, and the largest array of park, trail, and open space amenities. Alternative 1 assumes a total of approximately 7.5 million sq. ft. of total floor space for mixed-use redevelopment over the 20-year planning horizon. Redevelopment is analyzed for two time periods – 2016 which represents an interim redevelopment stage, and 2026 which is assumed to represent build-out of the project. This Alternative would include approximately 3.36 million sq. ft. of redevelopment with employment-generating uses including institutional, office, light industrial and marine-related uses (of the total employment space, approximately 450,000 sq. ft. would be marine industrial use space). This Alternative also includes approximately 3.69 million sq. ft. of residential redevelopment as multi-family housing units. Included within Alternative 1 is 445,000 sq. ft. of retail redevelopment with a range of goods and services uses.

Building heights would be assumed to be the highest under Alternative 1 and could reach 17 to 20 stories in some areas of the site; maximum building heights are assumed to range from 100 to 200 feet (refer to **Table 2-5** or detail).

The most extensive infrastructure, roadway and utility systems would be developed under Alternative 1, including new roads onsite, road connections to existing streets, bridges, and parks and trails throughout the site (refer to **Table 2-6** and **Figure 2-29** for detail on roadway infrastructure improvements under Alternative 1).

Approximately 15,800 parking spaces would be provided on the site. The vast majority of parking capacity under Alternative 1 would ultimately be provided via structured parking garages (refer to Section 2.8.2, **Description of Alternatives 1 through 3,** for additional detail on the parking strategy).

Under this Alternative, approximately 33 acres would be set aside for public parks, trails and open space. Parks and open space would include a mix of active and passive recreation opportunities with both hardscape and landscape elements. In addition to the 33 acres of parks/trails/open space, additional open space area would likely be created onsite including landscaped area associated with buildings, plazas and other public/private gathering spaces.
Under this Alternative, it is assumed that a marina with a different configuration from that assumed under the No Action Alternative would be constructed. This alternative marina configuration would feature a different number of moorage slips (up to 460 compared to 600 under the No Action Alternative), and additional public access and habitat features to complement mixed use redevelopment - including a public walkway around the marina (see **Section 2.6** of this chapter for additional information on the proposed marina to support mixed-use development on the site).

It is assumed under this Alternative that the railroad corridor would be relocated by 2016 to the eastern boundary of the site, adjacent to the bluff. Under this Alternative, the PSE Encogen plant would continue operations on the site for the 2016 timeframe but would be assumed to cease operations by 2026 (see **Section 2.6** of this chapter for additional information on the proposed realignment of the railroad corridor and operation of the Encogen facility).

Alternative 2 - Medium Density Alternative

Alternative 2 (see **Figures 2-8 and 2-9**) is the medium range redevelopment scenario. As compared to Alternative 1, this Alternative includes a reduced level of density, infrastructure network, and array of amenities. Alternative 2 assumes a total of approximately 6.0 million sq. ft. of total floor space for mixed-use redevelopment over the 20-year planning horizon. Redevelopment is analyzed for the two time periods – 2016 and 2026. This Alternative would include approximately 2.80 million sq. ft. of redevelopment with employment-generating uses including institutional, office, light industrial, and marine-related uses (of the total employment space, approximately 450,000 sq. ft. would be marine industrial use space). This Alternative also includes approximately 2.82 million sq. ft. of residential redevelopment as multi-family housing units. Included within Alternative 2, is 375,000 sq. ft. of retail redevelopment with a range of goods and services uses.

Building heights would be less than under Alternative 1 with maximum heights up to 140 feet (approximately 12 stories) in some areas of the site.

The level of infrastructure, roadway and utility systems would include new roads onsite, road connections to existing streets, bridges, and parks and trails at a level that would be slightly less than Alternative 1 (refer to **Table 2-6** and **Figure 2-30** for detail on roadway infrastructure improvements under Alternative 2).

The majority of parking capacity under Alternative 2 would also be provided via structured parking garages.

Under Alternative 2, approximately 24 acres would be set aside for public parks, trails, and open space, less than in Alternative 1. Parks and open space would include a mix of active and passive recreation with both hardscape and landscape elements. In addition to the 24 acres of parks/trails/open space, additional open space area would be created onsite including landscaped area associated with buildings, plazas and other public/private gathering spaces.

A marina similar to that described under Alternative 1 is assumed.

It is assumed under this Alternative that the railroad corridor would be relocated to the eastern boundary of the site by 2016. Under this Alternative, the PSE Encogen plant would continue operations on the site for the 2016 timeframe, but would be assumed to cease operations by 2026.

Alternative 2A – Medium Density Alternative with Delayed Railroad Relocation and Modified Roadway System

Alternative 2A (see **Figures 2-10 and 2-11**) would be similar to Alternative 2, with the following differences: the relocation of the railroad corridor would occur by 2026; the Cornwall Bridge would be provided and would be elevated over the relocated railway; and, Cornwall Avenue would remain open between the railroad crossing and Oak Street. Refer to **Table 2-6** and **Figure 2-31** for detail on roadway infrastructure improvements under Alternative 2A. The timing of certain roadway improvements would also differ from Alternative 2 (relative to the 2016 and 2026 time periods). See **Section 2.6** for detail on the assumed timing of roadway improvements.

Alternative 3 - Lower Density Alternative

Alternative 3 (see **Figure 2-12 and 2-13**) includes the lowest level of density, infrastructure network, and array of amenities, as compared to Alternatives 1 and 2. Alternative 3 assumes a total of approximately 4.0 million sq. ft. of total floor space mixed-use redevelopment over the 20-year planning horizon. Redevelopment is analyzed for the two time periods – 2016 and 2026. This Alternative would include approximately 2.15 million sq. ft. of redevelopment with employment-generating uses including institutional, office, light industrial, and marine uses (of the total employment space, approximately 450,000 sq. ft. would be marine industrial use space). This Alternative would also include approximately 1.59 million sq. ft. of residential redevelopment as multi-family housing units. Included within Alternative 3 is 260,000 sq. ft. of retail redevelopment with a range of goods and service uses.

Under Alternative 3, it is assumed that building heights would be lower than in Alternatives 1 and 2, with maximum building heights up to 100 feet (approximately 8 stories in some areas of the site).

Infrastructure, roadway, and utility systems would be developed under Alternative 3 at a level that would be generally less than in Alternatives 1 and 2 (refer to **Table 2-6** and **Figure 2-32** for detail on roadway infrastructure improvements under Alternative 3).

The majority of parking under Alternative 3 would be accommodated through surface lots and street parking.

Under this Alternative, approximately 15 acres would be set aside for public parks, trails, and open space. Parks and open space would include a mix of active and passive recreation with both hardscape and landscape elements. In addition to the 15 acres of parks/trails/open space, additional open space area would be created onsite including landscaped area associated with buildings, plazas and other public/private gathering spaces.

A marina similar to that described under Alternative 1 is assumed.

Under this Alternative, it is assumed that the railroad corridor would remain in its current alignment. Under this Alternative, the PSE Encogen plant would continue operations on the site for the 2016 timeframe but would be assumed to cease operations by 2026.

2.8.4 Description of Alternative 4 (No Action Alternative)

The No Action Alternative assumes that that the Proposed Actions would not be approved or implemented (i.e. the Master Development Plan and Development Agreement would not be approved); therefore, this Alternative assumes that the site would remain in its industrial zoning classification (see **Figure 2-37**). It is further assumed that some level of redevelopment would occur on the site over the 20-year build out horizon, including new industrial development and a new marina, boat launch, and boat haul-out facilities, consistent with existing zoning and the Port's condemnation action. Assumed development under the No Action Alternative would not achieve the Port's objectives for the site, nor the vision established through the Port/City public planning process, for providing new public access to the waterfront, creating a mixed-use neighborhood integrating with the Central Business District, and restoring shoreline habitat (see **Figures 2-38 and 2-39**).

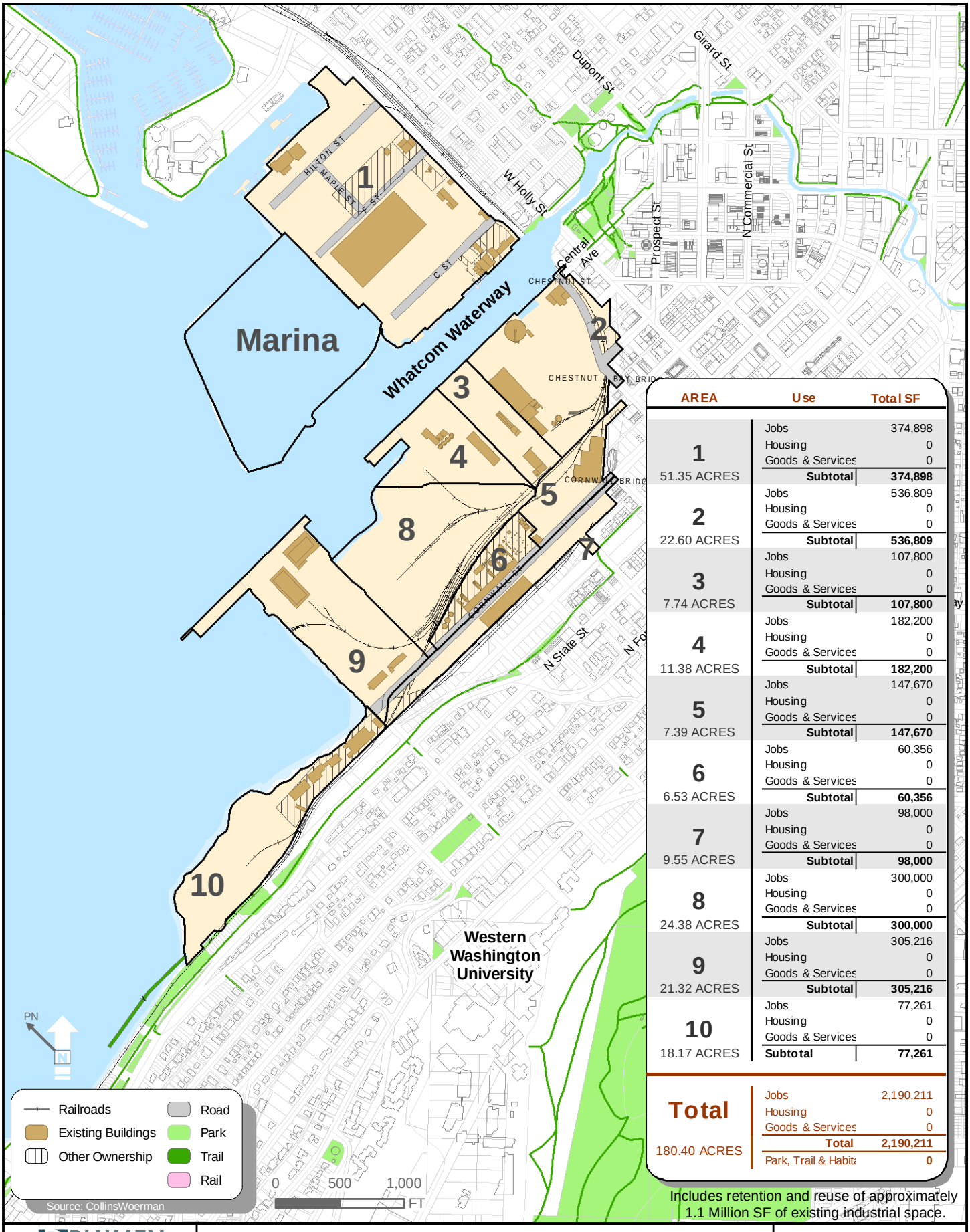
Under the No Action Alternative, it is assumed that approximately 1,040,000 square feet of new industrial development would occur on the site by 2026. In addition it assumes that approximately 1,155,000 square feet of existing building space would remain and would be reused for industrial purposes; therefore, a total of 2,195,000 square feet of building area would be located on the site. For purposes of this analysis it is assumed that 50 percent of the new and reused industrial development would occur by 2016.

The No Action Alternative assumes that the railroad corridor remains in its current location, and the Encogen facility remains in operation through 2026.

Roadway improvements assumed under the No Action Alternative include: at grade improvements of F Street, C Street and Hilton Avenue in Area 1; and development of internal cross roads in Area 1 (see **Figure 2-40**). It is assumed that roadway rights-of-way would be 60 feet in width for all public roadways on the site. It is assumed that these 60-foot right-of-way roadways would contain two drive lanes (one lane in each direction), a pedestrian path/bike lane on one side, landscape strip (potentially containing bioretention features) and a utility corridor. See **Figure 2-41** for a cross-section illustrating the onsite roadways.

Additional improvements currently planned by the Port or City for the site, with or without mixed-use redevelopment, and analyzed as elements of the No Action Alternative include:

- Marina Concept B
- Shipping Terminal Improvements



AREA	Use	Total SF
1 51.35 ACRES	Jobs	374,898
	Housing	0
	Goods & Services	0
	Subtotal	**374,898**
2 22.60 ACRES	Jobs	536,809
	Housing	0
	Goods & Services	0
	Subtotal	**536,809**
3 7.74 ACRES	Jobs	107,800
	Housing	0
	Goods & Services	0
	Subtotal	**107,800**
4 11.38 ACRES	Jobs	182,200
	Housing	0
	Goods & Services	0
	Subtotal	**182,200**
5 7.39 ACRES	Jobs	147,670
	Housing	0
	Goods & Services	0
	Subtotal	**147,670**
6 6.53 ACRES	Jobs	60,356
	Housing	0
	Goods & Services	0
	Subtotal	**60,356**
7 9.55 ACRES	Jobs	98,000
	Housing	0
	Goods & Services	0
	Subtotal	**98,000**
8 24.38 ACRES	Jobs	300,000
	Housing	0
	Goods & Services	0
	Subtotal	**300,000**
9 21.32 ACRES	Jobs	305,216
	Housing	0
	Goods & Services	0
	Subtotal	**305,216**
10 18.17 ACRES	Jobs	77,261
	Housing	0
	Goods & Services	0
	Subtotal	**77,261**
Total 180.40 ACRES	Jobs	2,190,211
	Housing	0
	Goods & Services	0
	Total	**2,190,211**
	Park, Trail & Habitat	**0**

Includes retention and reuse of approximately 1.1 Million SF of existing industrial space.

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Figure 2-37
Alternative 4 - No Action Alternative

New Whatcom Redevelopment EIS

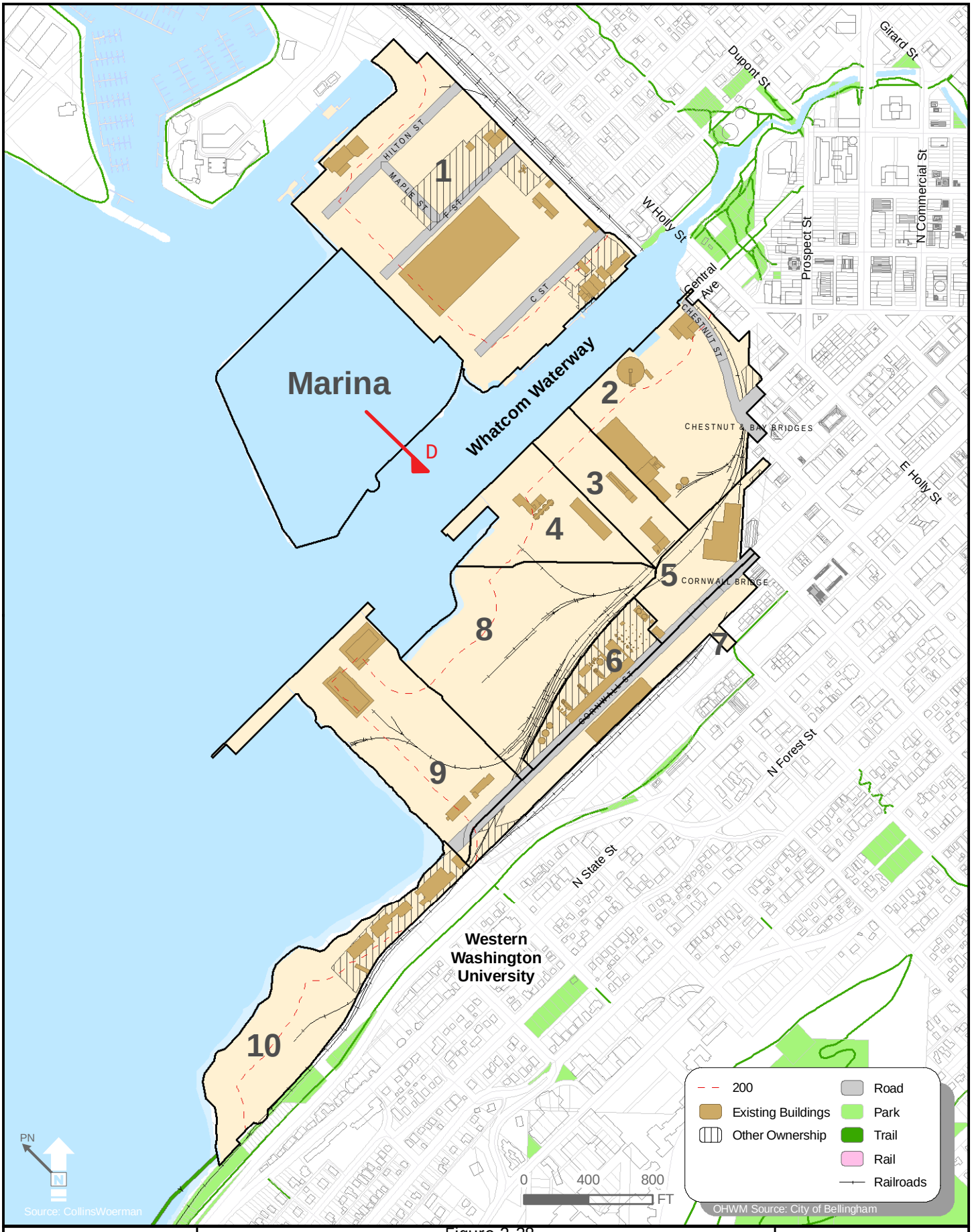

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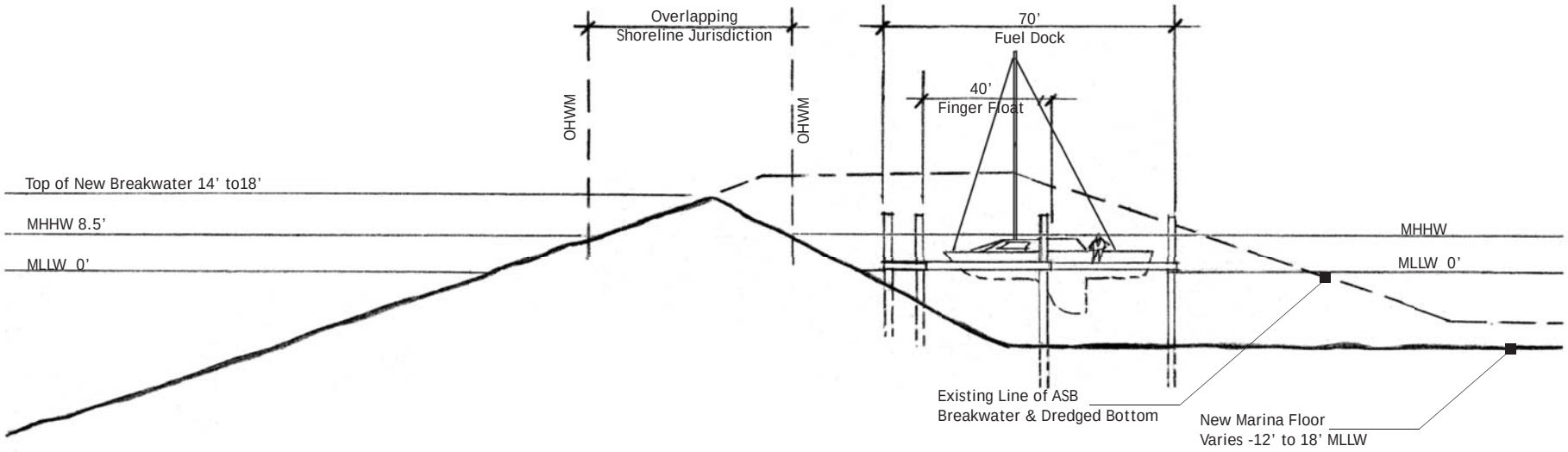
Figure 2-38
Shoreline Cross Section Locations
No Action Alternative

New Whatcom Redevelopment EIS



OHWM - Ordinary High Water Mark
MHHW - Mean High Water Mark
MLLW - Mean Low Water Mark
ROW - Right of Way

Notes
1. The shoreline jurisdiction extends both landward and waterward of the OHWM.

0' 10' 20'

Conceptual: For Illustriative Purposes Only

Source: CollinsWoerman

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Figure 2-39
Section D
No Action: 2026

New Whatcom
Redevelopment EIS

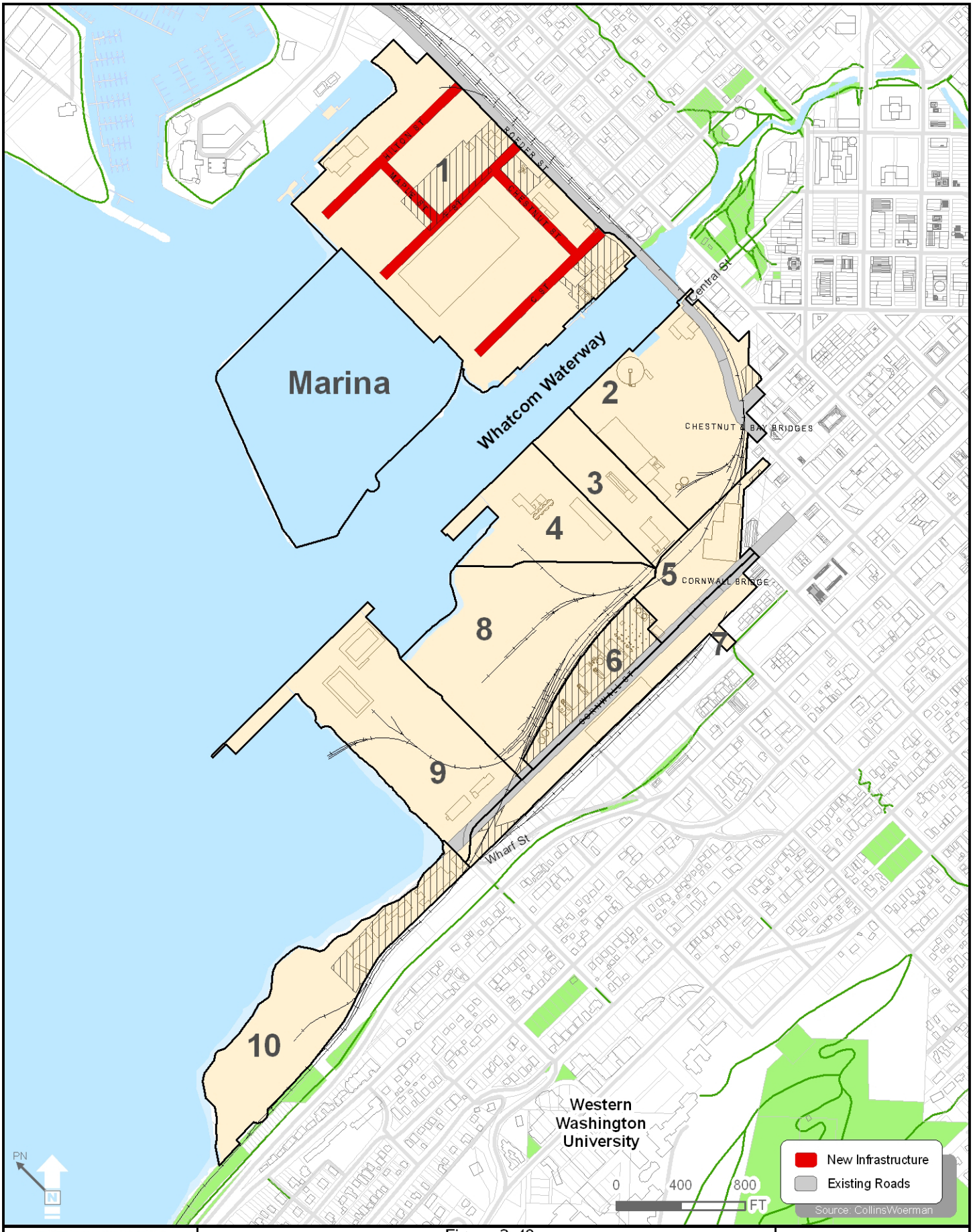

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Figure 2-40
Roadway Infrastructure Phasing
Alternative 4 - No Action Alternative

New Whatcom Redevelopment EIS

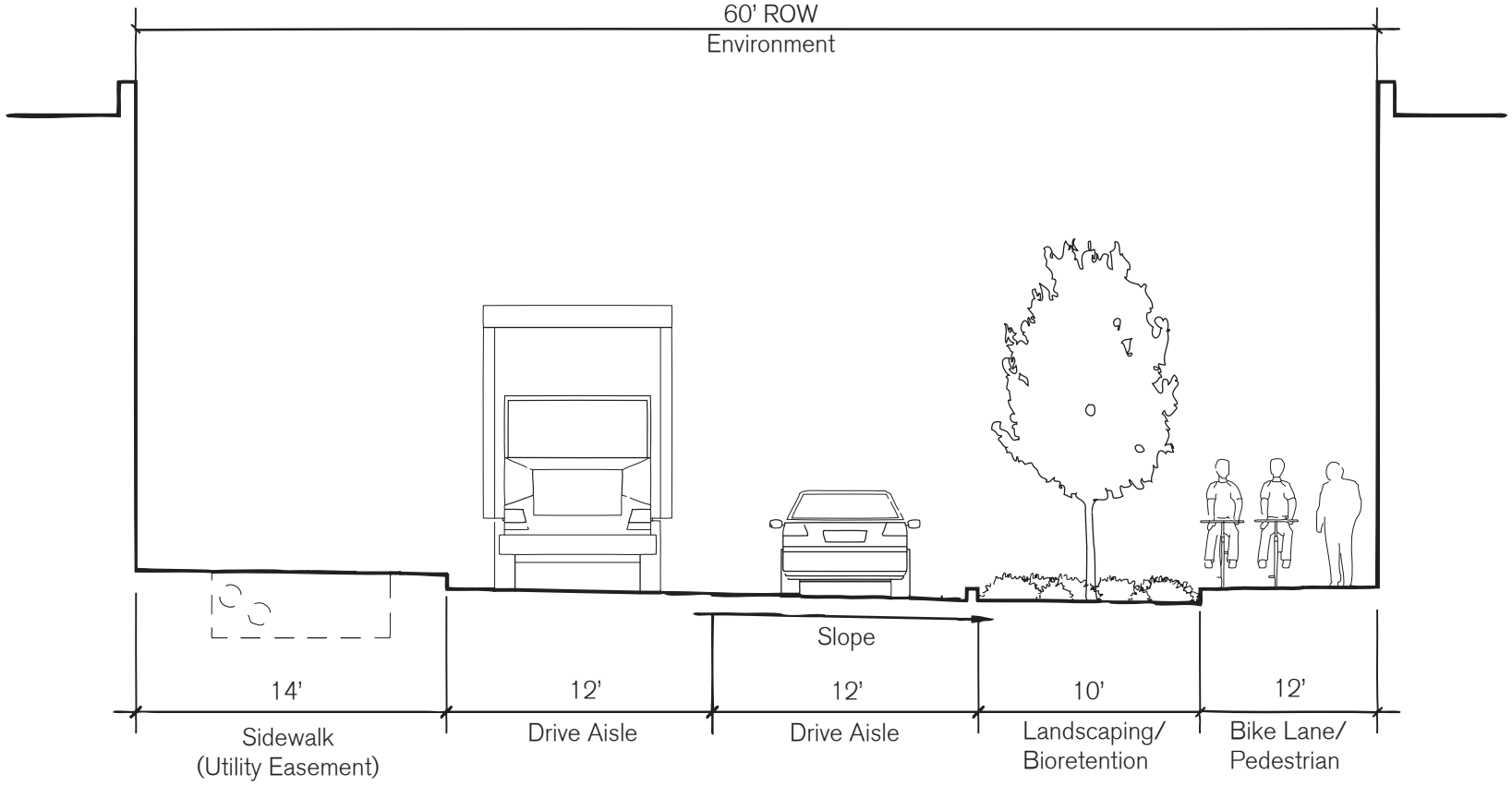

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Figure 2-41
Typical 60' ROW (Industrial Streets)
No Action

New Whatcom
Redevelopment EIS

Marina Concept B

Subsequent to completion of the cleanup activities in the ASB described in **Section 2.3.1**, and absent approval of the Proposed Actions, the Port of Bellingham intends to develop a marina consistent with the existing industrial zoning (Marina Concept B). It is assumed that Marina Concept B would be designed and constructed to meet the applicable requirements of the Shoreline Master Program (as indicated previously, the Port has submitted a complete Shoreline Substantial Development permit to the City for development of the marina in the remediated ASB consistent with Marina Concept A, along with support facilities; if the Proposed Actions are not approved, the Port could withdraw the current application and submit a revised application in the future for a marina that reflects Marina Concept B. Therefore, this Draft EIS describes and evaluates both concepts and a range of potential marina development).

Marina Concept B would include up to 600 slips (compared with up to 460 slips assumed for Marina Concept A) and support facilities such as pump out stations and a fueling facility. The boat launch ramp and associated trailer parking area, and gate house facilities, would be similar to Marina Concept A. While no pedestrian trail or park areas would be provided around the perimeter of the breakwater under Marina Concept B, opportunities for public access would be provided along the landside of the marina. **Figure 2-42** provides a conceptual plan of Marina Concept B.

As under Marina Concept A, establishment of a marina in the remediated ASB would provide new marine habitat in Bellingham Bay. New habitat features associated with the marina would include: the addition of approximately 28 acres of new habitat area; creation of shallow habitat benches; and, provision of salmon passage tunnels to provide additional connections with the Whatcom Creek estuary. Approximately 3.7 acres of new intertidal and shallow subtidal habitat would be assumed along the inner edge of the breakwater under Marina Concept B.

Development of a marina under Marina Concept B with up to 600 slips would result in in-water and over-water features in the ASB basin. These features would include up to 360 new piles (compared to 300 under Marina Concept A), up to 138,000 square feet of float area coverage (compared to 120,000 square feet under Marina Concept A), and approximately 1,200 square feet of ramp coverage area (similar to Marina Concept A).

As under Marina Concept A, operation of the marina would follow the Best Management Practices (BMPs) outlined in the Washington State Department of Ecology *Resource Manual for Pollution Prevention in Marinas* (Ecology, May, 1998 – Publication 9811). A copy of Ecology's *Resource Manual for Pollution Prevention in Marinas* is on file for review at the Port and City).

The Bellingham Shipping Terminal Improvements

The Port anticipates continuation of current operations at the Shipping Terminal with or without approval of the Proposed Actions. To accommodate continued operations, the Port anticipates that periodic maintenance and minor in-water/over-water improvements will be required. These minor improvements are categorized as north pier improvements and south end improvements. These improvements are illustrated in **Figure 2-43** and described below.

Improvements at the north pier of the Shipping Terminal would include the following: replacement of 400 lineal feet of sheet pile bulkhead; provision of approximately 3,000 cubic

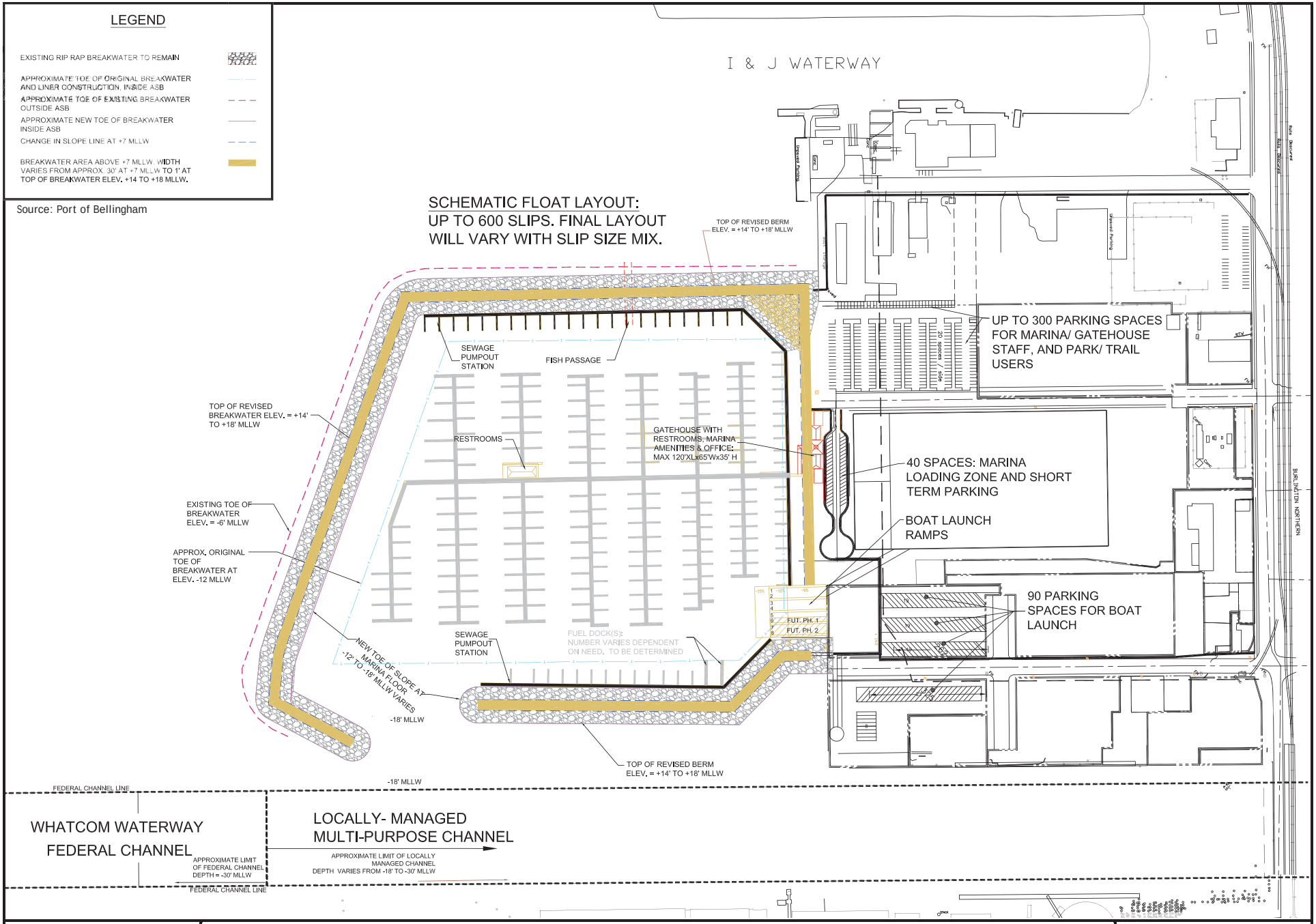

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Figure 2-42
Marina Concept "B"

New Whatcom Redevelopment EIS

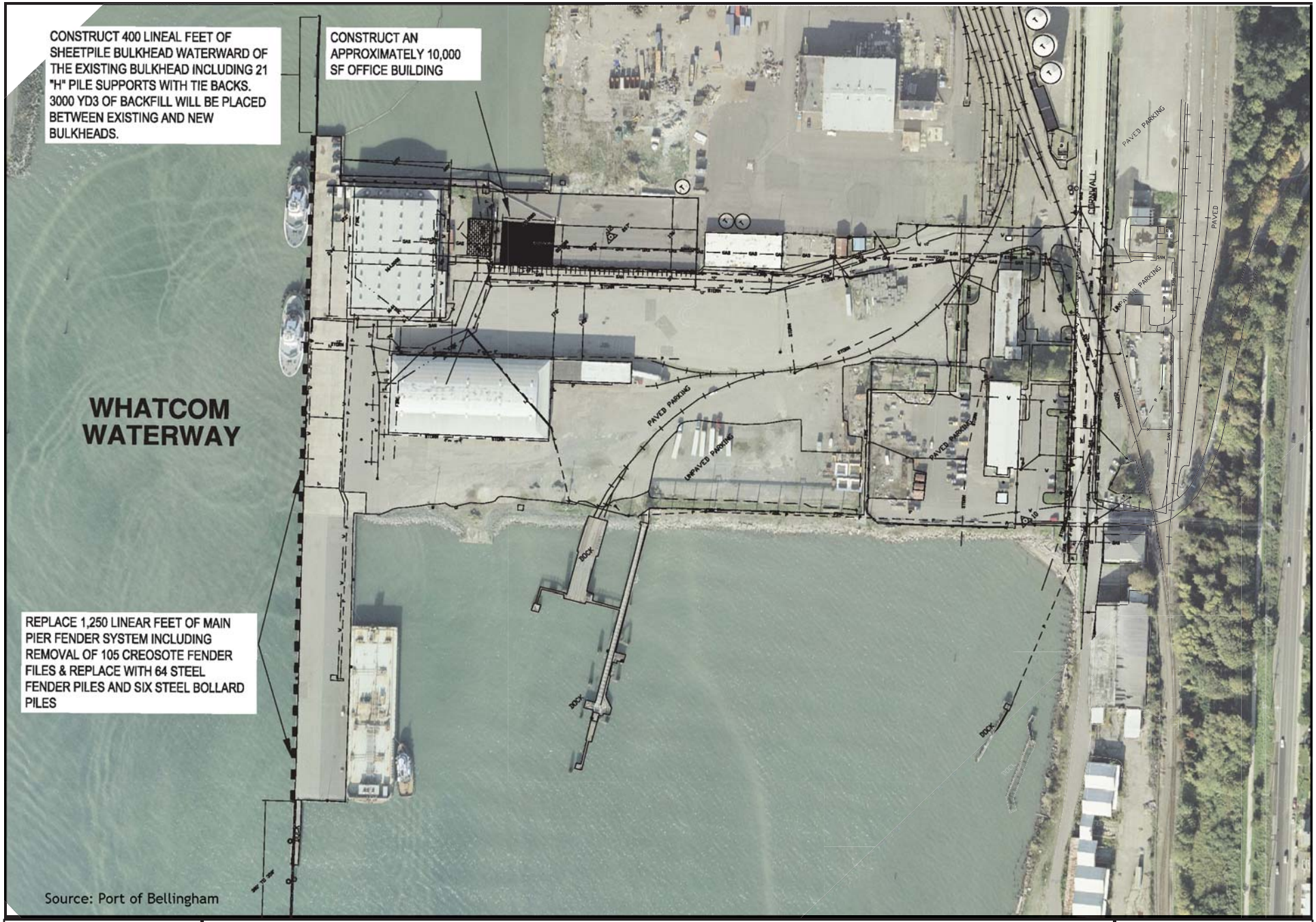

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Figure 2-43
Bellingham Shipping Terminal Minor Improvements

New Whatcom Redevelopment EIS

yards of backfill water-ward of the ordinary high watermark (OHWM); installation of 21 "H" pile supports with tiebacks; and, construction of an approximately 10,000 square-foot office building. The south end improvements would include replacement of approximately 1,250 linear feet of main pier fender system, including the removal of 105 creosote fender piles, and replacement with 64 steel fender piles and six steel bollard piles.

2.8.5 Summary of EIS Alternative Assumptions

Table 2-7 below summarizes the relationship between the various redevelopment assumptions highlighted above and the EIS Alternatives (Alternatives 1 through 4).

Table 2-7
SUMMARY OF ASSUMPTIONS UNDER ALTERNATIVES 1 THROUGH 4

	Alternative 1 – Higher Density	**Alternative 2 – Medium Density**	**Alternative 2A – Medium Density**	**Alternative 3 – Lower Density**	**Alternative 4 – No Action**
Feature					
Marina Concept	Concept A	Concept A	Concept A	Concept A	Concept B
Whatcom Waterway South Shoreline Restoration	Provided	Provided	Provided	Provided	Not Provided
Transient Moorage	Provided	Provided	Provided	Provided	Not Provided
Rail line Relocation	Relocated by 2016	Relocated by 2016	Relocated by 2026	Not Relocated	Not Relocated
Encogen Facility	Operational through 2016, relocated by 2026.	Operational through 2016, relocated by 2026.	Operational through 2016, relocated by 2026.	Operational through 2016, relocated by 2026.	Facility remains operational through 2026
Public Parks and Open Space	33 acres provided	24 acres provided	24 acres provided	15 acres provided	No new park/open space assumed
Uses Within Shoreline Environment	Due to assumed largest amount of shoreline area in public parks/open space, lowest potential for building redevelopment in the shoreline assumed.	Because of more limited amount of shoreline area in public parks/open space than Alt. 1, greater potential for building redevelopment in the shoreline than Alt. 1.	Because of more limited amount of shoreline area in public parks/open space than Alt. 1, greater potential for building redevelopment in the shoreline than Alt. 1.	Because of more limited amount of shoreline area in public parks/open space than Alts. 1 and 2, greater potential for building redevelopment in the shoreline than Alts 1 and 2.	No new public parks/open space in shoreline with corresponding potential for industrial building redevelopment in the shoreline.

Table 2-7
(cont'd)

	Alternative 1 – Higher Density	Alternative 2 – Medium Density	Alternative 2A – Medium Density	Alternative 3 – Lower Density	Alternative 4 – No Action
Feature					
Over-Water Pedestrian Bridge over Whatcom Waterway	Provided by 2016	Provided by 2026	Provided by 2026	Not provided	Not provided
Broadway Pedestrian Connection	Provided	Not provided	Not provided	Not provided	Not provided
Bellingham Shipping Terminal	No additional improvements assumed beyond minor upgrades under No Action	No additional improvements assumed beyond minor upgrades under No Action	No additional improvements beyond minor upgrades under No Action	No additional improvements beyond minor upgrades under No Action	Minor improvements planned

Source: Port of Bellingham, City of Bellingham, CollinsWoerman, 2007.

2.9 SEPARATE ACTIONS/BACKGROUND PROJECTS

Separate projects known to be planned or proposed on the site and in the site area are analyzed in this EIS on a cumulative basis together with the EIS Alternatives (Alternatives 1 through 4) (see **Chapter 3** of this Draft EIS for the cumulative impact analyses). These separate projects would occur independent of the Proposed Actions, and would be subject to agency decisions regarding environmental review under SEPA and/or NEPA, prior to issuance of any applicable permits and approvals. For example, in- and over-water improvements would require permits from state and federal agencies. These agencies would conduct additional environmental review at the time permit applications are submitted for review and approval. In addition, these separate projects would not be subject to the City's Planned Action Ordinance for New Whatcom.

Separate projects known to be planned or proposed on the New Whatcom site include:

- Bellingham Shipping Terminal Improvements – Major improvements including new piers
- Improvements Along the South Side of the I & J Waterway
- Improvements Along the North Side of the Whatcom Waterway
- Over-Water Trail Connecting Boulevard Park with Area 10 (partially within the site) and High-Speed Bicycle Trail

Separate projects known to be planned or proposed in the New Whatcom site area but not located within the site boundary include:

- Bellwether on the Bay Phase II Project
- 1010 Morse Square Project

- Bay View Tower Project

2.9.1 Onsite Separate Actions/Background Projects

Bellingham Shipping Terminal Improvements

As described earlier in this Chapter, the Port of Bellingham provides docking, unloading and service operations at the Shipping Terminal located in the northwestern portion of Redevelopment Area 9. The Port is planning for potential use of the Shipping Terminal by vessels associated with the National Oceanic and Atmospheric Administration (NOAA). To accommodate potential use of the Shipping Terminal by NOAA, the Port would develop two new piers to support additional large vessels. The two new piers would be located south of the existing Shipping Terminal pier (between the existing pier and Area 10) and are assumed to consist of two 600-foot long by 100-foot wide piers, each supported by approximately 1,200 piles (600 per pier). In addition, a new 300-foot long by 10-foot wide float, with associated 14 piles and gangway, would be attached to the northern most new pier. Over-water coverage (deep water) associated with these improvements would total approximately 124,000 square feet. These improvements are illustrated in **Figure 2-44**.

Approximately 20,000 cu. yd. of clean sediment and 38,000 cu. yd. of contaminated sediment would be dredged to accommodate large vessel navigation at the piers. If the new piers are not constructed, the contaminated sediments would not be dredged and the area would be covered by a soil cap under the scope of the Whatcom Waterway Cleanup Project. (See the *Final SEIS for the Whatcom Waterway Cleanup Site* and Section 3.5, **Environmental Health**, for more details on the Whatcom Waterway cleanup.)

To accommodate these new piers, the existing chemical dock covering approximately 8,000 square feet of water area, and associated 16 upland piles and 190 in-water piles, would be removed. The rail transfer span pier covering approximately 7,840 square feet of over-water area, and associated 20 upland piles and 128 in-water piles, would also be removed.

In addition to the demolitions and improvements associated with the new piers described above, additional improvements at the north pier and south end of the Shipping Terminal are also anticipated by the Port in the future (beyond those described earlier under the No Action Alternative). Improvements at the north pier would include: removal of two deteriorating moorage dolphins consisting of 24 creosote piles; installation of approximately three new moorage dolphins with 10 piles each; and, establishment of a new catwalk (225 feet long by 6 feet wide). Improvements at the south end would include the following: removal of an old catwalk covering approximately 1,440 square feet and associated 16 creosote piles; provision of a new 2,400 square-foot catwalk (400 feet long by 6 feet wide); and, provision of four new dolphins with 10 piles each.

Improvements Along Southern Side of I & J Waterway

The I & J Waterway is located between Hilton Avenue and Bellwether Way, and borders the northern edge of Area 1. The Port currently leases Area 1 property adjacent to the I & J Waterway to various businesses. With or without mixed-use redevelopment of the site, the Port anticipates that maintenance and certain in-water/over-water improvements will be required in

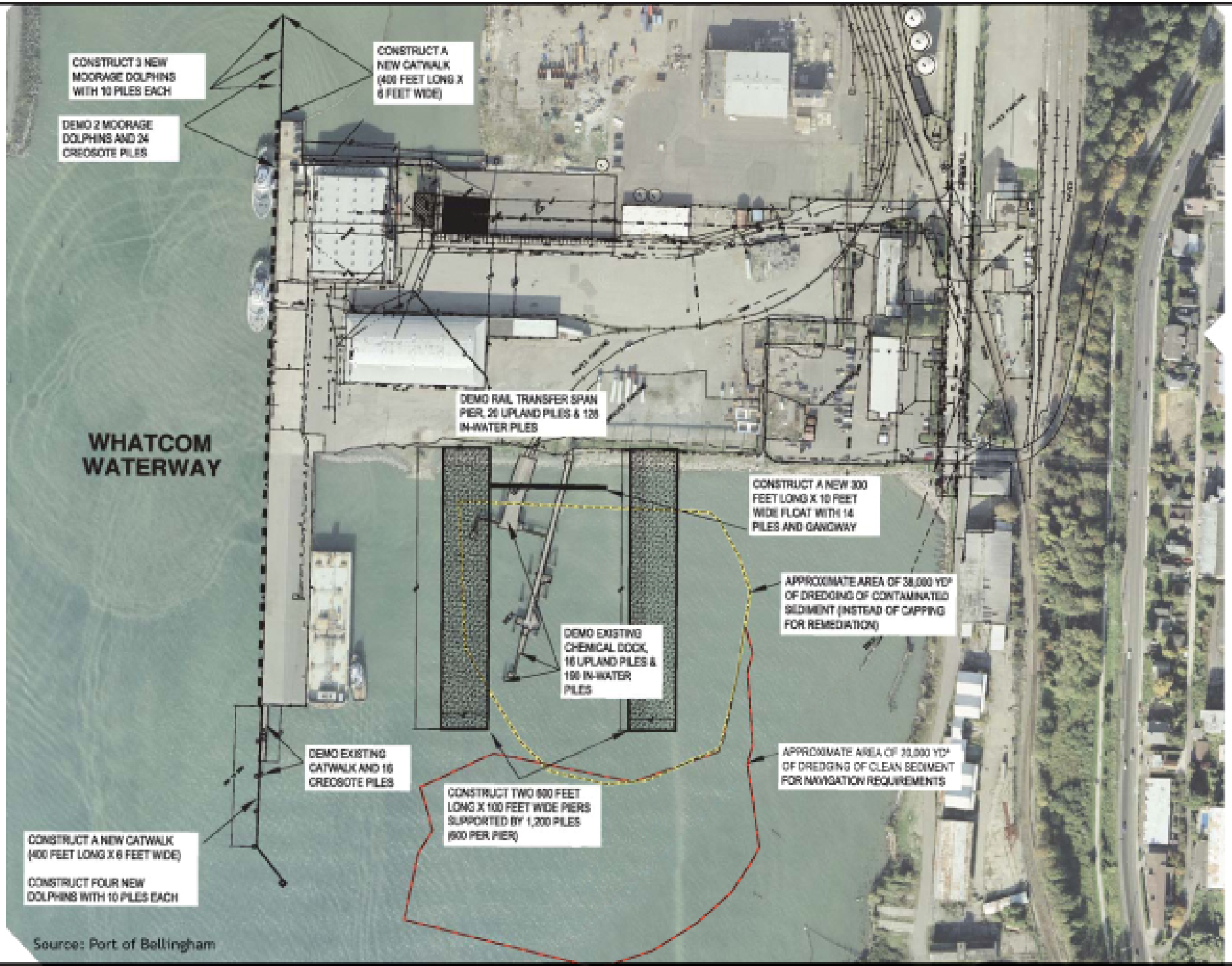

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Figure 2-44
Bellingham Shipping Terminal Major Improvements

New Whatcom Redevelopment EIS

the future. Planned I & J Waterway improvements by the Port include the demolition and removal of approximately 6,600 square feet of old piers and floats with associated 20 piles, and replacement with two new pier additions (10-foot wide by 150-foot long floats with 120-foot long by 8-foot wide ramps) and associated 24 structural piles; total water coverage of these new features would be 7,920 square feet for a net increase of 1,320 square feet. Approximately 1,150 linear feet of new sheet pile bulkhead with associated 58 H-piles would also be constructed over the existing bulkhead. See **Figure 2-45** for the location of the existing features to be removed and the contemplated improvements.

North Side of Whatcom Waterway Improvements

The Port contemplates that periodic maintenance and minor in-water/over-water improvements will be required to maintain the wharf/bulkhead along the northern edge of the Whatcom Waterway in the future. The Port anticipates that approximately 3,600 square feet of old pier with associated 40 pier piles and three moorage dolphins (consisting of 40 creosote piles) would be demolished and removed. These removed facilities would be replaced with approximately 760 linear feet of new sheet pile bulkhead with approximately 47 new "H" pile supports that would be constructed in front of the existing bulkhead. See **Figure 2-46** for the location of the existing features to be removed and the contemplated improvements.

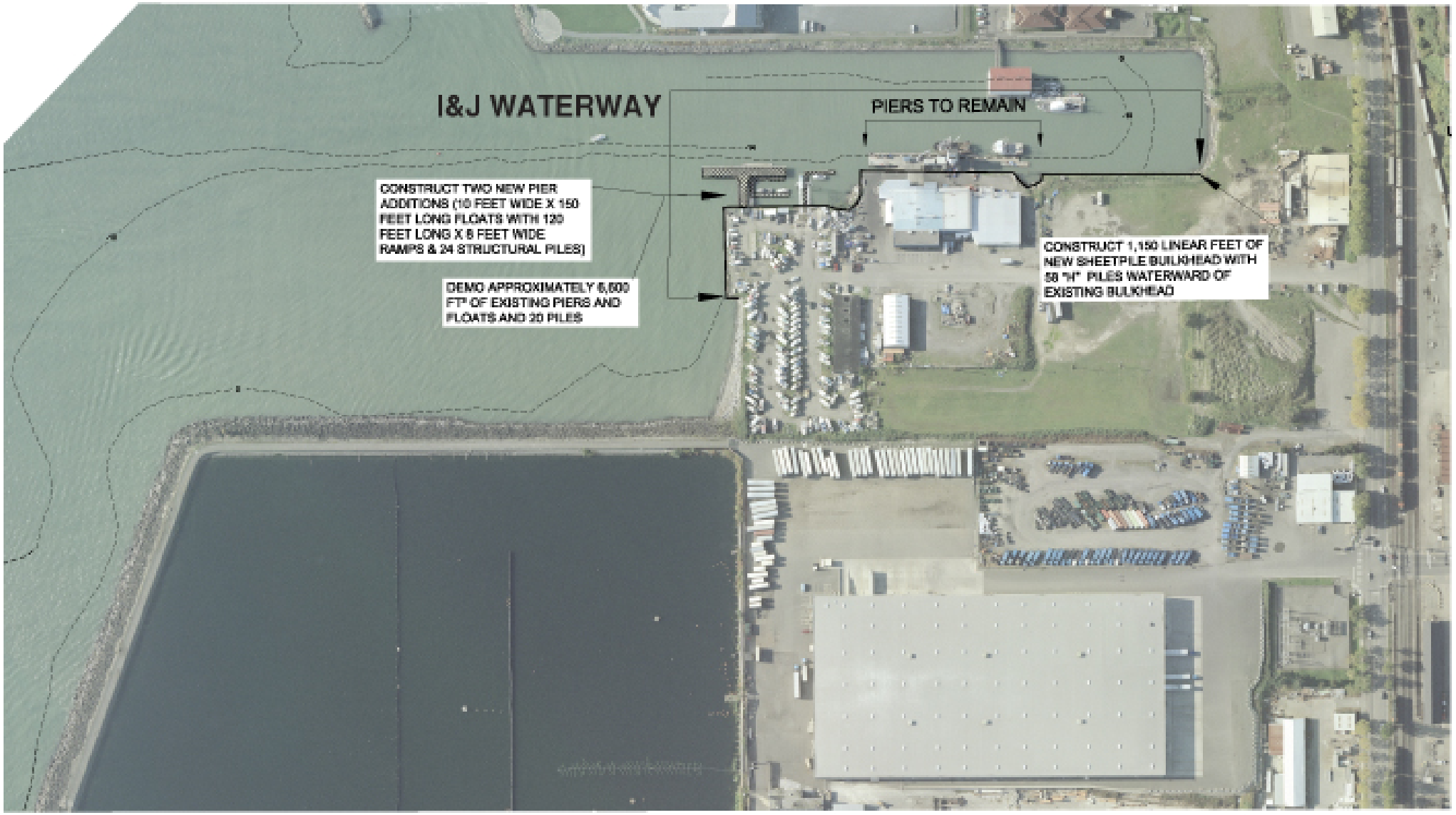
Over-Water Trail to Boulevard Park and High-Speed Bicycle Trail

The City of Bellingham anticipates that it will design, permit, conduct separate environmental review and build (if approved) an over-water trail connection between the western end of the New Whatcom site (Area 10) and the eastern end of Boulevard Park. This trail connection would provide an additional link to the South Bay Trail system. The existing South Bay Trail, which links the Taylor Dock in Fairhaven on the west to Downtown (E Maple Street) on the east, is approximately 2.5 miles in length. The portion of the existing trail from Taylor Dock to Pattle Point is over-water. The planned new over-water trail segment would be approximately 0.4 mile in length and would generally parallel the existing segment of the South Bay Trail traversing the shoreline bluff between Boulevard Park on the west and approximately Palm Street on the east. It is anticipated that this new trail segment would connect with the existing South Bay Trail at Boulevard Park. The specifics of the trail extension project are not known at this time; construction methods and trail features would likely be similar to the over-water trail linking Taylor Dock to Pattle Point. The City is also contemplating a high-speed bicycle trail parallel to the bluff through Areas 7 and 10 around the perimeter of the New Whatcom site. This trail would link with other bicycle trails in the site area.

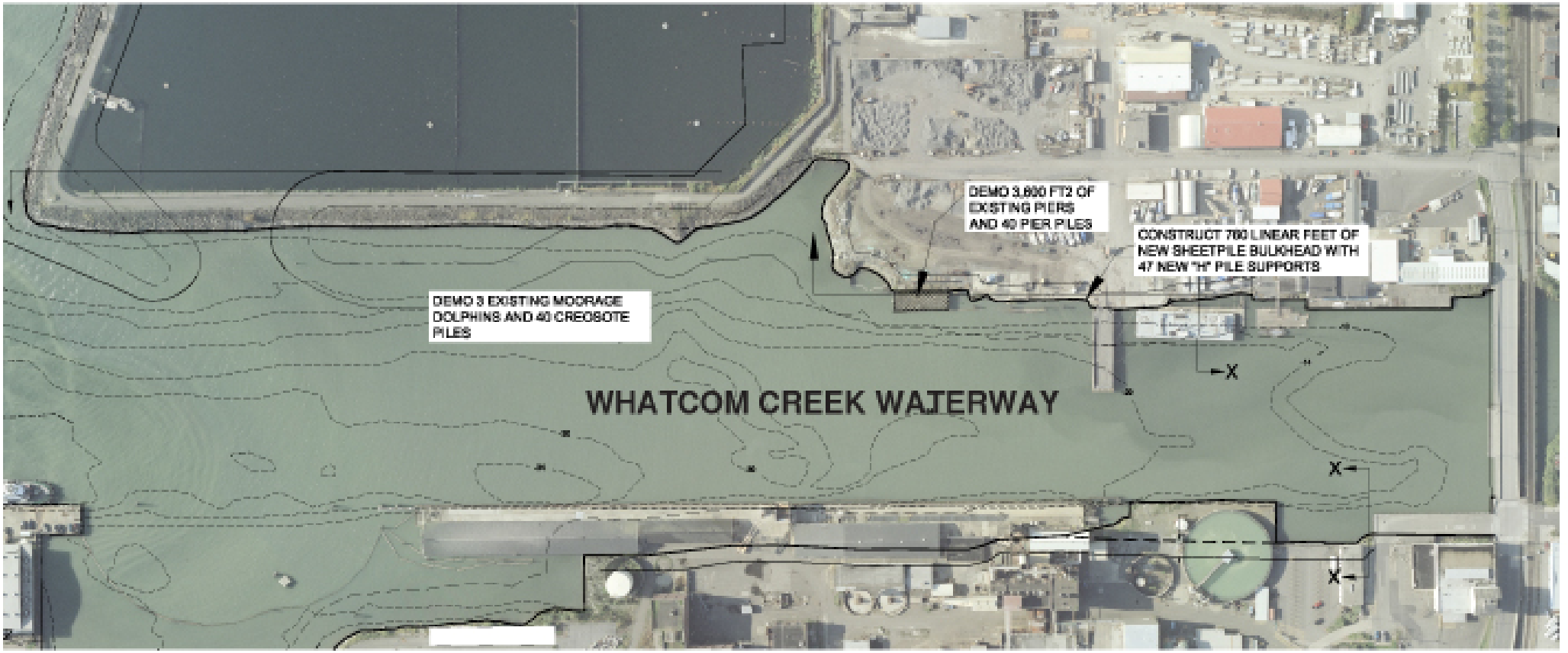
2.9.2 Offsite Separate Actions/Background Projects

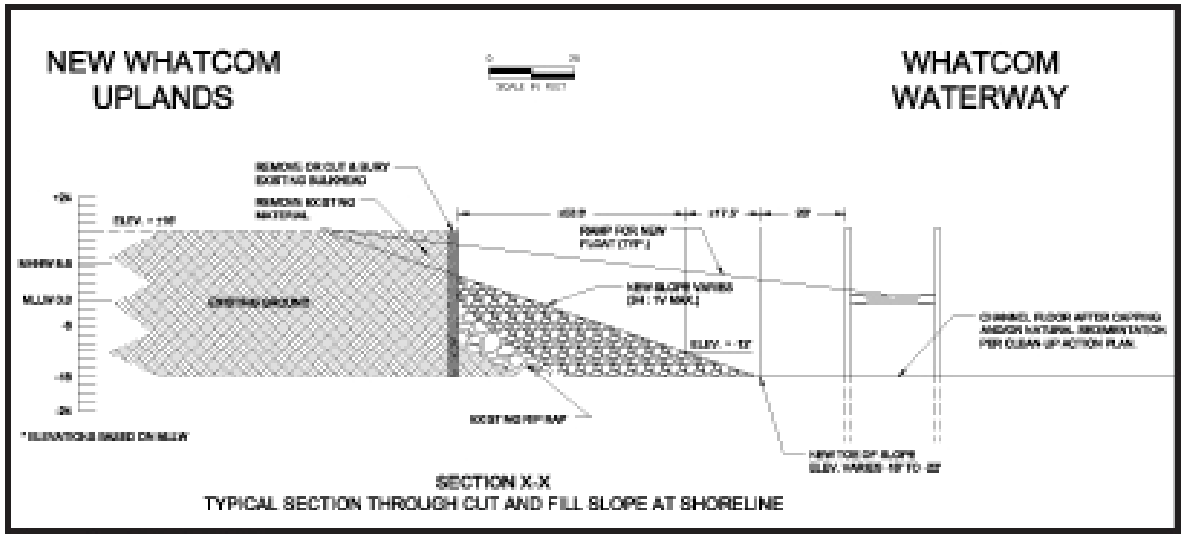
Bellwether on the Bay Phase II Project

The Port of Bellingham is working with Bellwether Gate LLC to develop remaining vacant land associated with Phase 2 of the "Bellingham on the Bay" development; the Bellingham on the Bay development currently includes two mixed-use office buildings, a hotel; and several restaurants. Located offsite on Bellwether Way, north of the I & J Waterway, Phase 2 would include up to four new mixed-use buildings containing approximately 200,000 square feet of retail, office and residential use. Buildings would be three to four stories in height, and would include approximately 300 underground and surface parking spaces.



Source: Port of Bellingham





Source: Port of Bellingham

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Figure 2-46
Improvements Along North Side of Whatcom Waterway

New Whatcom Redevelopment EIS

1010 Morse Square Project

A building permit application was submitted to the City of Bellingham for a mixed-use project consisting of 7 new buildings and providing 316 dwelling units including an 18-story condominium tower, 28 attached townhouse and flats as well as approximately 9,400 square feet of commercial uses. The site is located approximately one block south of the New Whatcom site on the 1000 block of Railroad Avenue (generally bounded by Maple Street, Laurel Street, Cornwall Avenue and Railroad Avenue). Two existing warehouse buildings would be demolished to accommodate the proposed mixed-use project.

Bay View Tower Project

A building permit application was submitted to the City of Bellingham for redevelopment of an existing parking lot at 1217 State Street (approximately 0.25 mile south of the New Whatcom site) to a 23-story mixed-use building, the majority of which would contain residential uses (124 units). Street level commercial space would also be provided. Parking would be provided via a seven-level structure, three levels below grade and four levels above grade, with a total of approximately 150 spaces.

2.10 NEW WHATCOM REDEVELOPMENT ELEMENTS IN RELATION TO THE PLANNED ACTION ORDINANCE

As described earlier in this chapter (Section 2.3), it is proposed that certain elements of redevelopment of the New Whatcom site be designated by the City of Bellingham as a Planned Action, pursuant to SEPA WAC 197-11-168(c). A Planned Action Ordinance would pertain to future redevelopment features that can reasonably be defined at this time for environmental review purposes and which will be subject to future City of Bellingham permit approvals.

The following features of proposed redevelopment (as reflected in Alternatives 1 through 3 and described earlier in this chapter) are intended to be elements of the Planned Action Ordinance, unless excluded as noted further below. Ultimately, the City of Bellingham will determine which redevelopment features are to be included in the Planned Action Ordinance. Elements intended to be included in the Planned Action Ordinance include:

- All upland building and parking structures, including office, institutional, industrial, retail and residential development and associated parking structures and facilities;

- Demolition of remaining upland buildings and other structures (post GP demolition activities);

- All upland infrastructure improvements on the site, including the primary and secondary roadway system (again, except as noted below); utility systems, including water, sanitary sewer, stormwater, electrical, and natural gas lines and other facilities; and parks, trails, landscaping and open space areas.

- Building, parking and infrastructure improvements within the shoreline jurisdiction area;

- Other improvements within the shoreline jurisdiction area, including the marina (Concept A) and associated marina facilities (boat launch, parking areas, gatehouse, parks and

trails, etc.); restoration of the shoreline along the south side of the Whatcom Waterway; transient moorage with the Whatcom Waterway; parks, trails and open space areas; the pedestrian bridge over the Whatcom Waterway; and certain other in-water and over-water improvements and shoreline restoration features along the I and J Waterway, Whatcom Waterway and Bellingham Bay; and,

- Removal of existing in-water and over-water structures and improvements (piles, bulkhead and wharf features).

As explained earlier in this Chapter, there is no definitive plan for long-term redevelopment of the New Whatcom site at this time. Therefore, specific building footprints, sizes and designs, the specific layout and design of parks and trails and the specific locations of uses cannot be pinpointed. In order to conduct comprehensive environmental review of the range of redevelopment features assumed under the EIS Alternatives, a series of assumptions were formulated regarding the mix and level of uses, parking, parks and open space, roadway network, stormwater treatment, etc. (see **Section 2.8** of this Chapter). These assumptions allow the identification of probable significant environmental impacts and mitigation under SEPA for the range of environmental elements analyzed in this Draft EIS, consistent with a Planned Action designation.

For example, assumptions regarding building heights allow for the evaluation of visual impacts from future redevelopment (in addition to heights, representative building massing and footprint concepts were formulated for illustrative purposes to depict how buildings could be located on the site to achieve the assumed density under each alternative; see Section 3.10, **Aesthetics/Light and Glare** and **Appendix K** for details). Assumptions regarding impervious surface coverage and stormwater treatment methods allow for the analysis of water quality impacts during construction and operation of the stormwater system. Assumptions regarding onsite parking supply ratios allow for the evaluation of on and offsite parking impacts from future redevelopment. In this way, it is possible to evaluate the potential for probable significant impacts from New Whatcom redevelopment and identify mitigation measures applicable to redevelopment in this Draft EIS.

When specific redevelopment is proposed in the future, the City would determine whether the potential significant impacts of each redevelopment project are within the parameters analyzed and mitigation identified in this EIS and ultimately addressed in the Planned Action Ordinance. The Planned Action Ordinance would specify the procedures and criteria for evaluating and determining projects as Planned Actions, including the thresholds that could be established relative to uses, heights, parks and open space, transportation trips, etc.; the review criteria that would pertain to determining consistency of projects; and the City's processes for making Planned Action determinations. When the Port or future developer submits construction and building permit applications for a future redevelopment project to the City, an evaluation of the project's consistency relative to the provisions of the Planned Action Ordinance, the Master Development Plan and the environmental analysis contained in the Draft and Final EIS would be conducted by the City. This process would also apply to roads, parks and other infrastructure projects to be undertaken by the City or other entity in the future.

For example, if and when Western Washington University decides to locate certain educational/research facilities at the site, the City would conduct an evaluation of the WWU building project relative to the Master Development Plan, the Planned Action Ordinance and the impact evaluation in the EIS. The City would determine whether the proposed project should be

designated as a Planned Action; if the project meets the criteria set forth in the Ordinance, as well as the Master Development Plan and applicable development regulations and standards of the City, it would be designated as a Planned Action project and no further environmental review would be required by the City. Possible criteria/thresholds could relate to the height of the building, its relationship to the shoreline (if applicable), the number of trips generated, the parking provided, the amount of impervious area generated, etc. The Planned Action designation would be based on the environmental analysis contained in this EIS and those documents incorporated by reference in this Draft and Final EIS, together with applicable codes, ordinances, development regulations and standards.

Certain elements of the New Whatcom redevelopment cannot be reasonably defined at this time and would not be subject to the City's Planned Action Ordinance. Such elements may require additional environmental review at the time applications for permits are submitted to the relevant agencies. Elements of New Whatcom redevelopment (Alternatives 1 through 3) that are not anticipated to be covered under the Planned Action Ordinance are identified below. At the time permit applications for the elements not covered by the Planned Action Ordinance are submitted to the City or applicable agencies, the City/agencies would determine if additional environmental review is required.

- Bridge connections to the adjacent roadway system, including elevated improvements at Bay Street, Commercial Street, Laurel Street and Cornwall Avenue, and the Wharf Street flyover (under certain EIS Alternatives);

- The Broadway Pedestrian connection that would connect Area 1 with areas to the east, potentially including a potential pedestrian overpass over the railroad tracks and Roeder Avenue.

- Offsite transportation mitigation improvements that could be undertaken by the City, Port or other entity in the future, potentially including intersection improvements, roadway widening and pedestrian/bicycle facilities; and

- Actions sponsored by others, including Puget Sound Energy (related to ongoing use of the Encogen facility) and BNSF/State Department of Transportation (the railroad corridor relocation).

In addition to the elements identified above that would not be subject to the Planned Action Ordinance, the Separate Actions/Background Projects described previously (see **Section 2.9** of the Chapter) would also not be anticipated to be covered under the Ordinance; therefore, these projects would undergo (or have undergone in the case of certain offsite projects) separate environmental review under SEPA and/or NEPA, as applicable. These include the two new piers at the BST, the Over-water Trail to Boulevard Park and the "high-speed" bicycle trail that could parallel the bluff through the site.

Further, under the No Action Alternative, it is assumed that the Proposed Actions would not be approved; therefore, it is assumed that a Planned Action Ordinance would not be adopted by the City. Elements of the No Action Alternative, including Marina Concept B and associated facilities and redevelopment of new industrial uses, would not be covered by a Planned Action Ordinance. However, all features of the No Action Alternative and its resultant environmental impacts are assumed to be fully analyzed in this EIS. Therefore, it is anticipated that the City would not require additional environmental review for implementation of the No Action

Alternative, assuming future No Action redevelopment features are consistent with those assumed herein. To the extent that permits are required from state and federal agencies (i.e. for Marina Concept B), those agencies would determine if additional environmental review is warranted in the future.

2.11 BENEFITS AND DISADVANTAGES OF DEFERRING PROJECT IMPLEMENTATION

The benefits of deferring approval of the Proposed Actions and implementation of redevelopment of the New Whatcom site include deferral of:

- Potential impacts from redevelopment on the transportation network, including increased congestion and delay on area streets;
- Potential impacts from redevelopment on public services providers, including the City Fire and Police Departments, Parks and Public Works Departments and Bellingham School District due to demand for fire and police services, parks and street maintenance and schools from new residents, employees and visitors to the site;
- Potential impacts from redevelopment on existing views from surrounding areas; and,
- Potential impacts from redevelopment on the air quality and noise environments onsite and in the surrounding area.

The disadvantages of deferring approval of the Proposed Actions and implementation of redevelopment include deferral of:

- The opportunity to create a mixed use urban village and a range of site amenities, including a public park, trail and open space system and boat moorage facilities;
- The opportunity to provide increased public access to the shoreline and enhanced aquatic and upland habitat;
- The ability to connect the site to downtown Bellingham and surrounding neighborhoods;
- More efficient land use of the property and the ability to accommodate a portion of the City's projected growth in housing and employment over the next 20 years, including provision of a range of employment and affordable housing opportunities; and,
- The ability to convert a "brownfields" waterfront site into more productive use.