CHAPTER 2

Description of the Preferred Alternative

CHAPTER 2 DESCRIPTION OF THE PREFERRED ALTERNATIVE

This chapter of the *New Whatcom Redevelopment Project Supplemental Draft EIS* provides: 1) an overview of the *New Whatcom Redevelopment Project Draft EIS* (issued by the Port of Bellingham in January 2008); 2) an explanation of planning activities that occurred after the Draft EIS (DEIS) was issued, why a Supplemental DEIS (SDEIS) is being prepared, and what will occur after the SDEIS is issued; 3) a description of the Port-recommended Proposal that is the basis for the Preferred Alternative analyzed in this SDEIS; and 4) a description of the Straight Street Grid Option that is also analyzed in this SDEIS. Key concepts related to this SDEIS are presented below in question and answer format. More detailed description of the Preferred Alternative and its relationship to the Alternatives described and analyzed in the DEIS follows these questions/answers. See **Chapter 1** for an Executive Summary of the information and analysis contained in this SDEIS and **Chapter 3** for a more detailed comparison of the probable significant adverse impacts of the Preferred Alternative to those impacts analyzed under the DEIS Alternatives and analysis of any new significant impacts and mitigation under the Preferred Alternative and Straight Street Grid Option.

2.1 BACKGROUND

Q1. What are the Proposed Actions analyzed in the January 2008 New Whatcom Redevelopment Project Draft EIS and in this Supplemental Draft EIS?

A. The Port of Bellingham (Port) and the City of Bellingham (City) identified the following Proposed Actions for the site that would be necessary to implement the New Whatcom redevelopment vision:

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 (also referred to herein as the Waterfront District).
- 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 Master Development Plan (MDP) for the Waterfront District (considered as a Subarea Plan under the Growth Management Act) allowing for a change in zoning from industrial to mixed-use.
- Adoption of Development Regulations for the Waterfront District.
- Approval of a Development Agreement between the City of Bellingham and the Port of Bellingham. The Development Agreement will reference the implementing

regulations for the site, along with infrastructure requirements, phasing and development standards.

- Adoption of a Planned Action Ordinance.
- Approval of future permits for infrastructure improvements, construction projects, and redevelopment activities within the redevelopment area over the buildout period.

The Proposed Actions evaluated in this SDEIS are the same actions as those contemplated in the January 2008 DEIS.

Q2. What were the EIS Alternatives analyzed in the Draft EIS?

A. When the New Whatcom Redevelopment Project Draft EIS (January 2008) was prepared, a preferred Master Development Plan (MDP) for the site had not been determined. Further evaluation and public input (i.e. via the EIS, ongoing master planning and ultimately the Port's and City's decision-making processes) will lead to consideration and adoption of an MDP for the New Whatcom site. In order to disclose environmental information relevant to the consideration and adoption of an MDP and other actions, the DEIS evaluates alternative redevelopment scenarios (EIS Alternatives).

For purposes of environmental review, three Redevelopment Alternatives (Alternatives 1, 2 and 3), one sub-alternative (Alternative 2A) and the No Action Alternative (Alternative 4) were formulated for evaluation in the DEIS. These five alternatives are intended to represent a full range of land use intensities and densities that the site could accommodate over the long term.

The DEIS Alternatives range from approximately 4.0 million square feet of mixed-use redevelopment under Alternative 3 to approximately 7.5 million square feet of mixed-use redevelopment under Alternative 1 by buildout in 2026 and call for a change in zoning from industrial to mixed-use. The No Action Alternative assumes that the Proposed Actions would not be approved or implemented. This Alternative assumes that some level of redevelopment would occur on the site over the 20-year buildout horizon, including new industrial development consistent with the site's existing zoning. A new marina to be located in the ASB area is assumed under all of the alternatives.

Within each DEIS Alternative, an assumed onsite road grid and offsite road connections are defined to support the redevelopment levels of each; additionally, a varying amount of public parks/trails/open space is assumed under each Alternative. Alternatives 1, 2 and 2A assume that the BNSF railroad corridor, that currently traverses through part of the site, would be relocated in the future to an area adjacent to the bluff at the site perimeter (see DEIS Chapter 2, Section 2.8 for details on the EIS Alternatives).

The Alternatives are intended to represent an overall envelope of potential redevelopment and a range of redevelopment scenarios for analysis in the DEIS; none should be considered a definitive plan for the New Whatcom site. Rather, they provide representative parameters and types of redevelopment that could be achieved over time. The DEIS recognizes that as part of the ongoing master planning and ultimate decision-making process, a different mix and configuration of land uses within the range of alternative redevelopment scenarios will likely be selected as the MDP by the Port and the City (and features of the Alternatives could be mixed and matched to arrive at an adopted plan; see Section 2.8 of the DEIS).

The EIS Alternatives are analyzed in the DEIS for two time periods – 2016, which represents an interim redevelopment stage, and 2026 which is assumed to represent buildout of the site.

Q3. What elements of the environment were evaluated in the Draft EIS?

- **A.** The New Whatcom Redevelopment Project Draft EIS contains detailed environmental analyses of the elements of the environment listed below. Technical reports were prepared for several of these elements and are appended to the DEIS as Volume II.
 - Earth
 - Air Quality
 - Water Resources
 - Plants and Animals
 - Environmental Health
 - Noise
 - Historic and Cultural Resources
 - Land Use
 - Relationship to Plans & Policies
 - Aesthetics
 - Population, Employment & Housing
 - Parks, Recreation & Open Space
 - Transportation
 - Public Services
 - Utilities

Q4. What planning activities occurred after the Draft EIS was issued?

A. A 60-day extended public comment period followed issuance of the DEIS. During this period comments were received from agencies, tribes and the public on the DEIS.

Ongoing master planning efforts and coordination with the City, citizen groups, agencies and stakeholders took place over the next several months regarding a plan for the Waterfront District. In addition, a series of meetings, unrelated to the SEPA process, were held following DEIS issuance.

The analysis in the DEIS, comments received on the DEIS, input from the City, agencies and the public, and ongoing work on the plan for redevelopment of the site by the Port identified several key areas of consideration, including:

- Redevelopment density at full buildout;
- View preservation strategies;
- Potential historic resource mitigation;
- The onsite road grid and offsite road connections, and their relationship to the topography of the site and to downtown Bellingham and the waterfront; and,
- Sustainable development strategies (i.e. related to environmental cleanup, habitat creation and infrastructure choices).

In March 2008, the Port of Bellingham's Board of Commissioners directed the Port staff to defer completion of the *New Whatcom Redevelopment Project Final EIS* in order to conduct further research and analysis of the key considerations for redevelopment. Based on this additional

work over the past several months, as well as ongoing input from the City and the public, the Port staff prepared a recommended Proposal to serve as the Preferred Alternative for analysis in this SDEIS (see Appendix A to this SDEIS for the Port-recommended Proposal).

Q5. What is a Supplemental EIS and why is it being prepared?

- A. The Washington State Environmental Policy Act (SEPA) Rules (WAC 197-11-405(4)) indicate that a Supplemental EIS (SEIS) should be prepared to supplement a Draft or Final EIS
 - There are substantial changes to a proposal so that the proposal is likely to have significant adverse environmental impacts; or,
 - There is significant new information indicating, or on, a proposal's probable significant adverse impacts.

A public comment period is required on a SEIS.

As currently defined by the Port, the level of redevelopment under the Preferred Alternative would be within the range of redevelopment assumed for the EIS Alternatives analyzed in the DEIS. This SDEIS provides an opportunity to describe and evaluate the Preferred Alternative and identifies any new or increased significant impacts or mitigation that could result from redevelopment under the Preferred Alternative. Further, the SDEIS provides a specific comparative analysis of the impacts of the Preferred Alternative and the DEIS Alternatives, as well as an opportunity for the public to comment on the Preferred Alternative and the results of this analysis.

The City of Bellingham has also requested that a rectilinear road grid option to support redevelopment of the New Whatcom site be analyzed in this SDEIS. This road grid option. known as the "Straight Street Grid Option", would be similar to the rectilinear road grid included under DEIS Alternatives 1 - 3 (see Question/Answer 10 below for more information).

Q6. What will occur after this Supplemental Draft EIS is issued and what will the Final EIS include?

A. A 30-day public comment period will follow issuance of the SDEIS; written comments can be submitted during this 30-day period (see the Fact Sheet in this SDEIS for more information). A public hearing to obtain verbal comments on the SDEIS will be held as well. Public and agency comments received on this SDEIS, as well as the comments received during the previously held 60-day comment period on the January 2008 DEIS, will be included in a Final EIS. Responses to all applicable comments will be provided in the FEIS.

Q7. What will occur after the Final EIS?

A. The Draft EIS, Supplemental Draft EIS and Final EIS will be used as tools by the Port and City (along with other considerations, analyses and public input) to refine the Preferred Alternative and formulate a proposed MDP and Subarea Plan for the Waterfront District, as well as the draft Development Agreement, draft Development Regulations and draft Planned Action Ordinance. Figure 2-5 in Chapter 2 of the DEIS illustrates the anticipated environmental and subsequent approval process for the New Whatcom Redevelopment Project. Important steps in this process are summarized below.

The Port, City and the master planning team will continue to refine the Preferred Alternative and formulate an MDP/Subarea Plan for the project, based on the results of the DEIS, this SDEIS and the FEIS, ongoing economic and market analyses, prior and continued public input, and other considerations. The Port and City staff will define a proposed MDP for the Waterfront District for additional public review and input. This proposed MDP, along with other regulatory actions, will be reviewed by the Port Commission, City Planning Commission and City Council, as required. Public hearings will be held during the decision-making process and there will be ongoing opportunities for public input. Ultimately, the entire package of regulatory and planning actions will be considered for approval. The MDP, Development Agreement, Development Regulations and Planned Action Ordinance (see Question/Answer 9 below for a description of a Planned Action Ordinance and how it relates to this project/EIS), if approved, will provide the framework for long-term redevelopment of the site.

Subsequent to the above approvals, permit applications for infrastructure improvements, construction projects and building redevelopment activities within the site will be submitted to the City and/or other agencies over the long-term buildout period. The City would determine whether each project is consistent with the approved MDP and other applicable regulations, as well as the Planned Action Ordinance, and would assess whether the environmental impacts and mitigation for these projects have been adequately addressed in the EIS. If so, further environmental analysis would not be required under SEPA and the City would make decisions on permits according to the appropriate process. For projects that require other state and federal permits, the appropriate agencies would review such projects and make decisions on the permits according to their applicable processes. These agencies would also determine if the EIS adequately covered the impacts/mitigation related to the specific projects. When appropriate approvals have been obtained from the City and agencies, multiple/phased construction and redevelopment projects would be implemented on the site.

Q8. What is the Preferred Alternative and how does it relate to the Alternatives analyzed in the Draft EIS?

As indicated above, based on the information provided in the DEIS, ongoing public input, additional analysis and master planning, and coordination between the Port and the City, as well as other agencies, groups and stakeholders, the Port staff prepared a recommended Proposal to serve as the Preferred Alternative for analysis in this SDEIS (see Appendix A to this SDEIS). The Preferred Alternative is intended to be a medium density, sustainable development that features a diversity of uses that are complimentary to the downtown Bellingham Central Business District; an infrastructure network that integrates with and connects the waterfront to surrounding areas; and, a system of parks, trails and open space that opens up the Waterfront to the community. The Preferred Alternative would be consistent with the applicant's (Port's) objections, as defined in the DEIS (see Section 2.4 of the DEIS for details). The level of redevelopment under the Preferred Alternative would be within the range of redevelopment assumed for the EIS Alternatives in the January 2008 DEIS. Redevelopment under the Preferred Alternative would mix and match elements of the EIS Alternatives. As an example, the redevelopment density under the Preferred Alternative would be comparable to that under DEIS Alternatives 2/2a (up to 6 million square feet of office, institutional, marine industrial, residential and retail uses). The amount of parks, trails and habitat area under the Preferred Alternative would be similar to that assumed under Alternative 1 (approximately 33 acres). The Preferred Alternative also includes development of a marina at the remediated ASB.

The Preferred Alternative is based on a modified street grid for long-term redevelopment of the Waterfront District. The new grid would be rotated at the top of the bluff that currently divides the Waterfront District from the existing downtown in order to provide efficient connections to the downtown and other surrounding areas, opportunities for formal view corridors, and cost-effective engineering solutions for bridging the bluff and the BNSF railroad corridor. The Preferred Alternative would feature approximately 2.7 million square feet of mixed use redevelopment by 2016, and approximately 6.0 million square feet of mixed use redevelopment by 2026; at buildout the Preferred Alternative would provide 33 acres of open space and parks. The Preferred Alternative also assumes development of a marina at the remediated ASB area and ongoing cleanup of portions of the site in conjunction with redevelopment.

The Preferred Alternative represents a further refinement of the EIS Alternatives in the DEIS in the following key areas:

- Redevelopment density and mix of uses
- Road system
- Grading/stormwater management concept
- Parks and shoreline habitat plan
- In-water work
- Sustainable "green" design strategies
- Historic buildings
- View corridors
- Development regulations
- Elimination of the pedestrian bridge over Whatcom Waterway

See Section 2.3 for additional information on the Preferred Alternative and its relationship to the DEIS Alternatives and **Appendix A** for the Port-recommended Proposal that is the basis for the Preferred Alternative analyzed in this SDEIS.

Q9. What is a Planned Action, and how does it relate to this EIS?

A. According to the State Environmental Policy Act (SEPA), a "Planned Action" is a designation for a project or elements of a project that shifts environmental review from the time a permit application is made to an earlier phase in the planning process. The intent of this designation is to provide a more streamlined environmental process by using an existing EIS prepared at the planning stage for SEPA compliance for long-term actions.

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.

The January 2008 DEIS indicated that it is intended that the majority of the features of proposed redevelopment of the New Whatcom site be designated by the City of Bellingham as a Planned Action(s) (see DEIS Chapter 2, Section 2.10 for details on the elements assumed to be designated in the Planned Action Ordinance). These features include most elements of upland and shoreline building development, the road and parks/trails network and various in-water and over-water features, including the marina and transient moorage features in the Whatcom Waterway (except as noted below). Similar features of redevelopment under the Preferred Alternative would be assumed to be designated as a Planned Action(s) by the City.

As indicated in the DEIS, the Planned Action Ordinance would pertain to future redevelopment projects subject to City of Bellingham permits (i.e. construction, building and shoreline permits). Certain features, such as in-water improvements, would require permits from federal and/or state agencies as well. The applicable federal or state agency would determine if additional environmental review is required at the time permit applications are submitted to such agencies in the future.

Certain elements of the New Whatcom redevelopment cannot reasonably be defined at this time and would not be subject to the Planned Action Ordinance. The elements, listed below may require additional environmental review at the time applications for permits are submitted to relevant agencies.

- Bridge connections to the adjacent roadway system (including at Bay St, Commercial St. and Cornwall Ave.):
- Offsite transportation mitigation improvements that could be undertaken by the City, Port or another entity in the future (including the roundabout at the Wharf St./State St. intersection);
- Environmental site remediation actions under the jurisdiction of the State Department of Ecology;
- · Actions sponsored by others (i.e. the railroad relocation by BNSF and the State Department of Transportation).

In addition to the elements identified above that would not be subject to the New Whatcom Planned Action Ordinance, the Separate Actions/Background Projects (listed in DEIS, Chapter 2, Section 2.9), would also not be covered by the Planned Action Ordinance. Separate projects would still undergo (or have already undergone) separate environmental review under SEPA and NEPA.

After issuance of the FEIS, it is expected that the City of Bellingham would adopt the New Whatcom Planned Action Ordinance. The City's Planned Action Ordinance, if adopted, would reflect a decision that adequate environmental review has been completed for the designated projects and that further environmental review under SEPA would not likely be necessary. When specific redevelopment projects are proposed in the future, the City would determine whether the potential impacts of each project are within the parameters analyzed and mitigation identified in the this EIS (inclusive of the DEIS, SDEIS and FEIS) and ultimately addressed in the Planned Action Ordinance. If not, additional environmental review may be required. However, if potential impacts are within the parameters analyzed in the EIS and adopted as part of the Planned Action Ordinance, and future projects are consistent with the adopted MDP and applicable development regulations and standards of the City, further environmental analysis would not be required under SEPA.

Q10. What is the Straight Street Grid Option?

A. The City of Bellingham has requested that a rectilinear road grid option to support redevelopment of the New Whatcom site be analyzed in this SDEIS. This road grid option, known as the "Straight Street Grid Option", would be similar to the rectilinear road grid included under Alternatives 1 - 3 in the DEIS, except that there would be no 5-legged intersection at the Laurel St./Commercial St./Log Pond Rd. intersection. In addition, a bridge connection across the railroad tracks would not be provided at Commercial St. a reconstructed bridge would be provided at Cornwall Ave. over the relocated railroad corridor.

Many features of this Option (i.e. redevelopment density, mix of uses, amount of parks/open space, stormwater concept and marina concept) are assumed to be similar to those included under the Preferred Alternative. The key differences between the Straight Street Grid Option, as defined by the City, and the Preferred Alternative would include: the orientation of the street grid and its connections to adjacent areas; the assumed building heights; the assumed retention of certain historic buildings; and, the assumption of view corridors along road rights-of-way (see **Section 2.4** in this SDEIS for further descriptions of these differences). For comparative purposes, this SDEIS evaluates the potential impacts of this Option relative to the Preferred Alternative.

As part of the ongoing master planning process, the Port will continue to refine the Preferred Alternative and formulate a proposed MDP/Subarea Plan that would include an onsite road grid to support long-term, phased redevelopment of the Waterfront District. The proposed MDP/Subarea Plan could reflect the modified (angled) street grid included in the Preferred Alternative, the straight street grid, or some combination of the two grids.

2.2 INTRODUCTION AND SITE AREA

As described in the DEIS, the New Whatcom site includes approximately 216.3 acres of contiguous waterfront property and adjacent aquatic area in central Bellingham (see **Figures 2-1** and **2-2**).

For descriptive purposes in the DEIS, the New Whatcom site was divided into 10 redevelopment areas (Areas 1 - 10) comprising 180.4 acres (see DEIS Figure 2-4 and Table 2-1 for an illustration and further description of these redevelopment areas). The 35.9-acre ASB area was also included within the site boundary and was referenced as Redevelopment Area 11 in the DEIS.

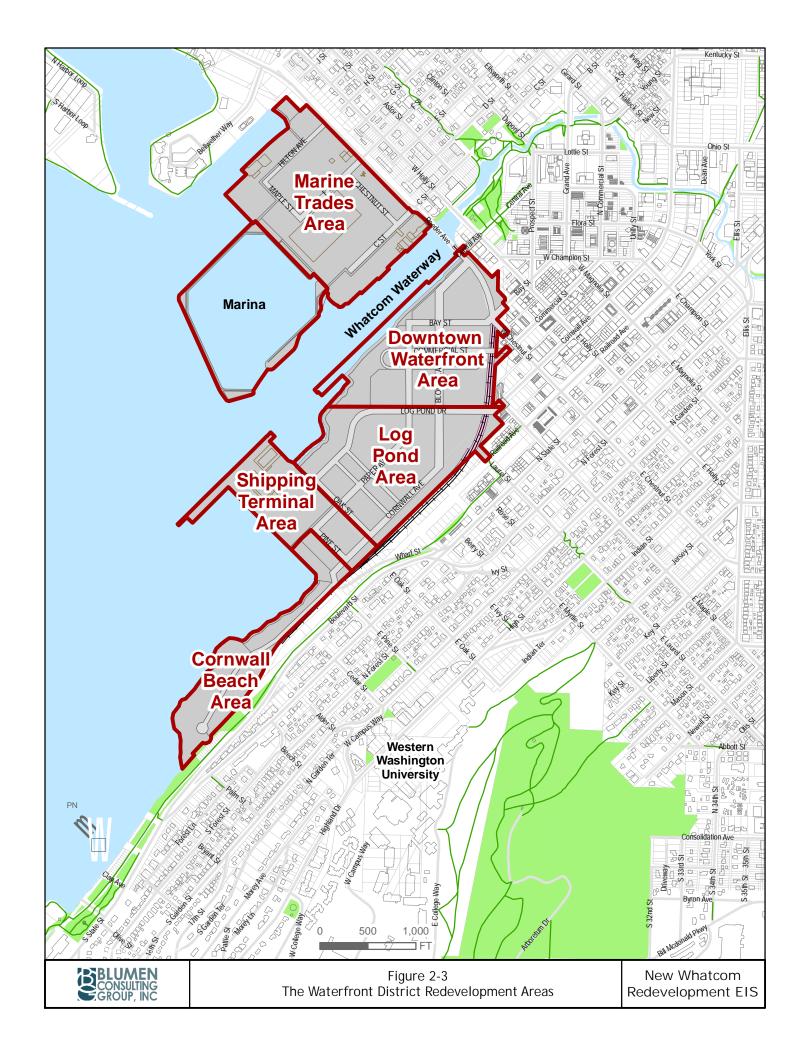
In the Port-recommended Proposal (see **Appendix A** to this SDEIS) and this SDEIS, the site is no longer described in terms of the numbered redevelopment areas. Instead, the site has been divided into five named redevelopment areas that reflect the type of uses proposed in each area under the Preferred Alternative. Below is a list of the SDEIS redevelopment areas, their approximate areas, followed by the DEIS redevelopment areas that generally comprise these renamed areas.

- Marine Trades 51 acres (DEIS Area 1)
- Downtown Waterfront 44 acres (DEIS Areas 2, 3, 4 and a portion of Area 5)
- Log Pond 42 acres (DEIS Areas 6 and 8, and portions of Areas 5 and 7)
- Shipping Terminal 21 acres (DEIS Area 9 and a portion of Area 7)
- Cornwall Beach 22 acres (DEIS Area 10)

The above terminology will be used throughout this SDEIS (See **Figure 2-3** for a depiction of the redevelopment areas under the Preferred Alternative).







2.3 PREFERRED ALTERNATIVE

As described previously in this chapter, based on the information provided in the DEIS, ongoing public input, additional analysis and master planning, and coordination between the Port and the City, as well as other agencies, groups and stakeholders, the Port staff prepared a recommended Proposal to serve as the Preferred Alternative for analysis in this SDEIS (see **Appendix A**). The Preferred Alternative is intended to be a medium density, sustainable development that features a diversity of uses that are complimentary to the downtown Bellingham Central Business District; an infrastructure network that integrates with and connects the waterfront to surrounding areas; and, a system of parks, trails and open space that opens up the Waterfront to the community. The Preferred Alternative is based on a modified street grid for long-term redevelopment of the Waterfront District. The level of redevelopment under the Preferred Alternative would be within the range of redevelopment assumed for Alternatives 1 - 3 in the DEIS. Redevelopment under the Preferred Alternative would mix and match elements of DEIS Alternatives 1 and 2 (see **Figures 2-4** and **2-5** for plans illustrating redevelopment under the Preferred Alternative in 2016 and 2026, respectively).

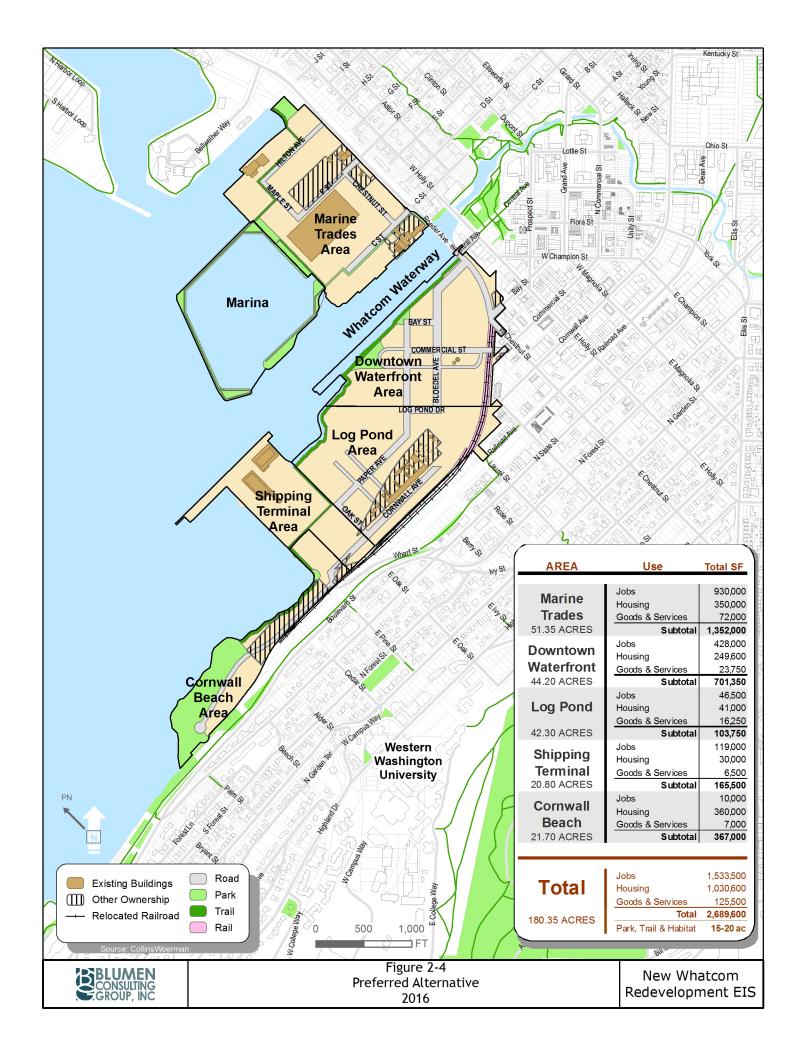
Following is a description of the Port-recommended Preferred Alternative, including the key areas in which the EIS Alternatives in the DEIS were further refined to arrive at the Preferred Alternative

2.3.1 Redevelopment Density

The level of redevelopment under the Preferred Alternative would be within the range of redevelopment assumed for Alternatives 1 - 3 in the DEIS; the proposed redevelopment would mix and match elements of Alternatives 1 and 2.

Under the Preferred Alternative, redevelopment would include a total of approximately 2.7 million square feet of new uses by 2016 and a total of approximately 6.0 million square feet of new uses at full buildout in 2026 (see Tables 2-1 and 2-2 for a summary breakdown of land uses on the site under the Preferred Alternative, and Appendix B for the complete land use assumptions for the Preferred Alternative). As under Alternatives 1 - 3, over the 20-year buildout period the site would transition from a "brownsfield area" to a new dense, urban mixed use village. Overall redevelopment density under the Preferred Alternative would be similar to under DEIS Alternative 2 and can be described as medium density. The Preferred Alternative would include less area in residential uses and increased amounts of office, institutional and light/marine industrial uses, as compared to the levels under Alternative 2. The increase in light/marine industrial uses would be primarily located in the Marine Trades Area north of the Whatcom Waterway. The Preferred Alternative would include approximately 33 acres of new parks, trails and habitat areas, similar to Alterative 1. In addition to the new parks, trails and habitat areas, a new, 460-moorage slip marina would be located in the former ASB area. Table 2-3 provides a comparison of the redevelopment assumptions for the DEIS Alternatives, the Preferred Alternative and the Straight Street Grid Option.

Maximum building heights under the Preferred Alternative would be similar to those analyzed in the DEIS, and would range from 35 feet to 200 feet, depending on the specific area of the site.



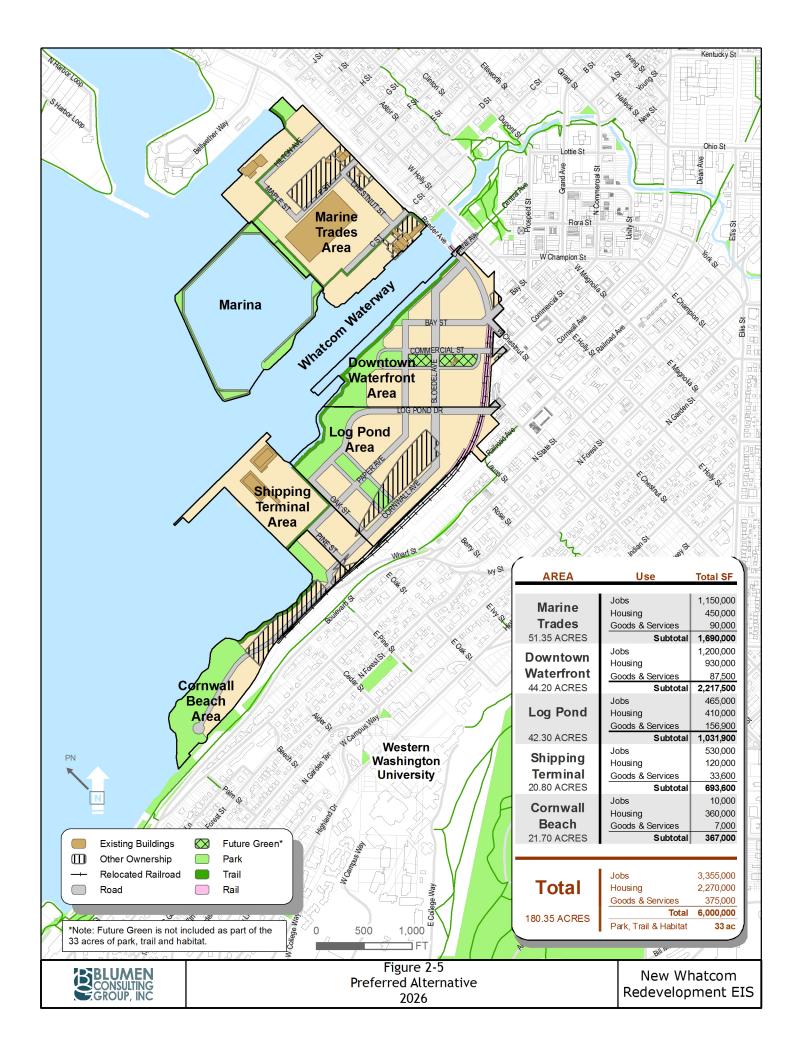


Table 2-1
REDEVELOPMENT SUMMARY COMPARISON - 2016

	DEIS Alt. 1 Higher Density	DEIS Alt. 2/2A Medium Density	DEIS Alt. 3 Lower Density	DEIS Alt. 4 No Action Alt.	Preferred Alternative
Assumed Uses (ft ²)					
Office/Institutional/ Commercial	976,000	753,000	548,000	0	998,500
Marine Industrial					
	310,000	330,000	310,000	520,000	535,000
Goods & Services ¹	151,000	125,500	80,250	0	125,500
Residential	1,931,500	1,480,600	789,000	0	1,030,600
Total New Uses ¹	3,368,500 ²	2,689,600 ²	1,727,250 ²	1,097,500 ³	2,689,600 ²
Parks & Open					
Space⁴	33 acres	24 acres	15 acres	0	15 – 20 acres
Residential Units	1,610	1,234	658	0	859

Source: CollinsWoerman, 2008

¹ Includes retail, restaurant and service type uses.

² The total square footage includes some redevelopment/reuse of existing building space.

³ The total square footage includes some retention and reuse of existing building space under the No Action Alternative.

⁴ The DEIS Alternatives assume that all parks and open space would be developed by 2016.

Table 2-2
REDEVELOPMENT SUMMARY COMPARISON - 2026

	DEIS Alt. 1 Higher Density	DEIS Alt. 2/2A Medium Density	DEIS Alt. 3 Lower Density	DEIS Alt. 4 No Action Alt.	Preferred Alternative
Assumed Uses (ft²)					
Office/Institutional/ Commercial	2,915,000	2,355,000	1,700,000	0	2,670,000
Marine Industrial	450,000	450,000	450,000	1,040,000	685,000
Goods & Services ¹	445,000	375,000	260,000	0	375,000
Residential	3,690,000	2,820,000	1,590,000	0	2,270,000
Total New Uses	$7,500,000^2$	$6,000,000^2$	$4,000,000^2$	2,195,000 ³	$6,000,000^2$
Parks & Open					
Space	33 acres	24 acres	15 acres	0	33 acres
Residential Units	3,075	2,350	1,325	0	1,892

Source: CollinsWoerman, 2008

² The total square footage includes some redevelopment/reuse of existing building space.

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

¹ Includes retail, restaurant and service type uses.

Table 2-3 **COMPARISON OF ASSUMPTIONS -**DEIS ALTERNATIVES, PREFERRED ALTERNATIVE, STRAIGHT STREET OPTION

Feature	DEIS Alt. 1 Higher Density	DEIS Alt. 2 Medium Density	DEIS Alt. 3 Lower Density	DEIS Alt. 4 No Action	Preferred Alternative	Straight Street Option
Redevelopment Density (ft ²)						
- 2016 - 2026	3,368,500 7,500,000	2,689,600 6,000,000	1,727,250 4,000,000	1,097,500 2,195,000	2,689,600 6,000,000	2,689,600 6,000,000
Road Grid	Rectilinear	Rectilinear	Rectilinear	Rectilinear	Angled	Rectilinear
Maximum Building Height	100 feet -200 feet ¹	75 feet – 100 feet ¹	75 feet – 100 feet ¹	No max. ht. limit per existing zoning	35 feet - 200 feet ¹	75 feet
Public Parks and Open Space	33 acres provided	24 acres provided	15 acres provided	No new parks/open space assumed	33 acres provided	33 acres provided
Rail Line Relocation	Relocated by 2016	Relocated by 2016	Not Relocated	Not Relocated	Relocated by 2016	Relocated by 2016
Marina Concept	Concept A w/ up to 460 slips	Concept A w/ up to 460 slips	Concept A w/ up to 460 slips	Concept B w/ up to 600 slips	Concept A w/ up to 460 slips	Concept A w/ up to 460 slips
Historic Bldgs./ Structures	5 buildings/ structures assumed to be retained or reused ²	5 buildings/ structures assumed to be retained or reused ²	5 buildings/ structures assumed to be retained or reused ²	All buildings assumed to be retained	Up to 10 buildings/ structures could be retained or reused ³	Up to 13 buildings/ structures could be retained or reused
Population ⁴ (People) - 2026	5,873	4,489	2,531	0	3,614	3,614
Employment ⁵ (Employees) - 2026	8,722	7,205	5,376	1,600	8,354	8,354
Housing (Housing Units) - 2026	3,075	2,350	1,325	0	1,892	1,892

Source: CollinsWoerman, 2008.

¹ Maximum building height would vary by area on the site. The Preferred Alternative includes a height limit of 35 feet in relation to

proposed view corridors.

² For worst-case analysis purposes, the DEIS Alternatives 1 -3 assumed that 17 of the 22 existing buildings onsite at least 40 years of

age could potentially be removed.

The Preferred Alternative assumes that 10 buildings onsite at least 40 years of age could potentially be retained, reused or relocated/preserved in some manner. In some cases this could include relocation or reuse of building materials. The Straight Street Grid Option assumes 13 buildings onsite at least 40 years of age could potentially be retained.

⁴ Population and employment projections are based on 100 percent occupancy, with no vacancy assumed in residential or commercial

buildings

Employment was not calculated for the 2016 interim redevelopment stage for the No Action Alternative.

2.3.2 Roadway System

As described in the DEIS, Alternatives 1 - 3 would feature a rectilinear road grid. DEIS Figures 2-29 through 2-32 illustrate the assumed roadway systems under Alternatives 1 - 3 for the years 2016 and 2026. The combination and timing of new roadway improvements would vary among Alternatives 1 - 3. Table 2-6 in DEIS Chapter 2 summarizes the roadway improvement assumptions for Alternatives 1 - 3 for the years 2016 and 2026.

The Preferred Alternative is based on a modified street grid for long-term redevelopment of the Waterfront District. Based on ongoing analysis of a range of factors, including topography, view orientation, connections to existing streets, constructability and cost, location of the railroad corridor, vehicle capacity, etc., the road grid would be rotated at the top of the bluff that currently divides the Waterfront District from the existing downtown. The modified grid is intended to provide efficient connections to downtown and surrounding areas, opportunities for formal view corridors, and cost-effective engineering solutions for bridging the bluff and the BNSF railroad corridor. The onsite roadway system north of the Whatcom Waterway (the Marine Trades Area) under the Preferred Alternative would also be somewhat modified as compared to DEIS Alternatives 1 - 3.

The key new roadway connections to the existing street network under the Preferred Alternative are listed below. These connections would be similar to those identified under DEIS Alternative 2, except that there would be no new bridge connection at Laurel St., a new bridge would be constructed at Cornwall Ave./Log Pond Dr. and a roundabout (or traffic signal) is proposed at the Wharf St./N. State St. intersection under the Preferred Alternative.

- In the Marine Trades Area, **F St.** would be the primary site access corridor, service street and truck route. Access to the Marine Trades Area via extensions of **C St.** and **Hilton Ave.** would also be provided.
- For the redevelopment areas south of the Whatcom Waterway, there would be four primary access point connections between the site and the existing roadway network (as well as an improvement at Wharf St.), including:
 - Improvements to **Central Ave.** at Roeder Ave.
 - New bridge connection at Commercial St.
 - New bridge connection at Cornwall St./Log Pond Dr.
 - Reconstruct the bridge connection at Bay St.
 - **Wharf St.** roundabout or traffic signal at the Wharf St./N. State St./ N. Forest St. intersection.

Table 2-4 summarizes the roadway improvement assumptions for the Preferred Alternative for years 2016 and 2026. **Figure 2-6** provides an illustration of the conceptual road system under the Preferred Alternative for years 2016 and 2026.

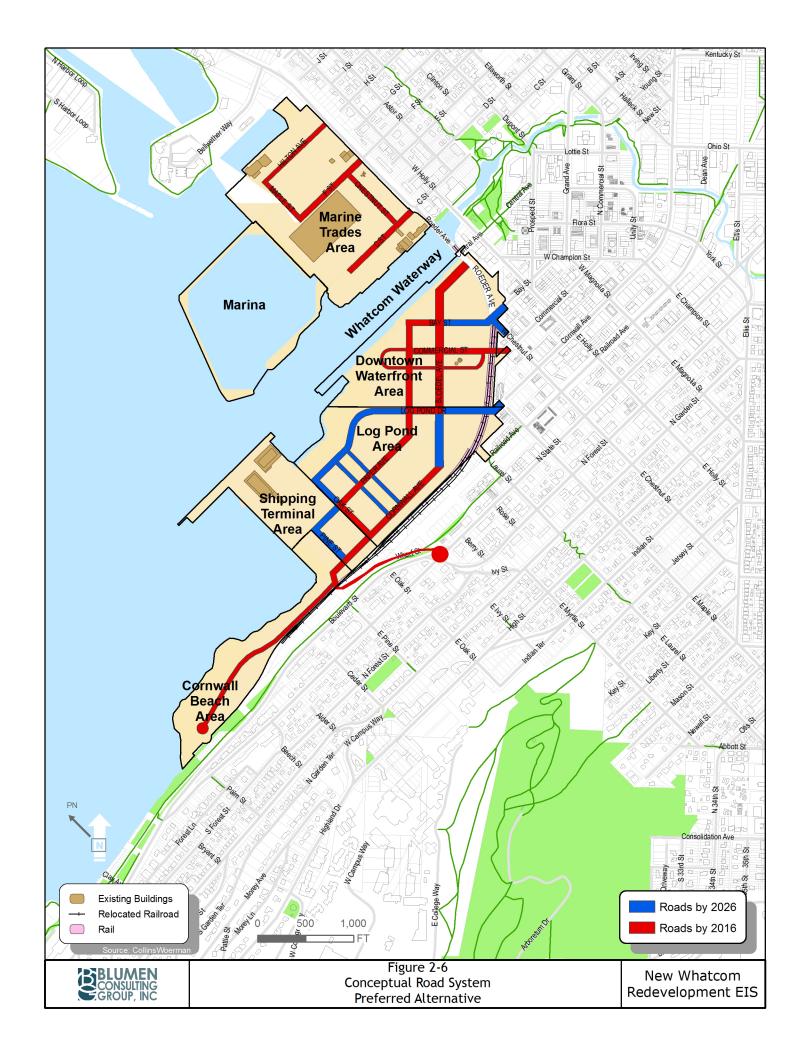
The capacity of the road network under the Preferred Alterative and its relationship to individual roadway improvements and levels of redevelopment are addressed in **Section 3.12**, **Transportation** and **Appendix M** to this SDEIS.

Table 2-4
ROADWAY IMPROVEMENT ASSUMPTIONS – PREFERRED ALTERNATIVE

Road Improvements by 2016	Road Improvements by 2026				
North of the Whatcom Waterway (Marine Trades Area)	North of the Whatcom Waterway (Marine Trades Area)				
 At grade improvements to Hilton Ave., F St. & C St. Develop Maple St. & Chestnut St. connectors¹ Install traffic signal at C St./Roeder Ave. and C St./Holly St. upgrade C St. and provide at-grade rail crossing. 	• Same as 2016				
South of the Whatcom Waterway	South of the Whatcom Waterway				
At grade improvements to Central Ave. & extend to new Bloedel Ave.	Develop Paper Ave. connector from Oak St. to Pine St.				
 Extend Bloedel Ave. to Log Pond Dr. Install traffic signal at Central Ave./Roeder Ave. intersection. Convert Central Ave. between Holly St. and Roeder Ave. to pedestrian access only. 	 Develop Oak St. from Paper Ave. to Log Pond Dr. Reconstruct Bay St. bridge and extend Bay St. to Bloedel Ave.; install traffic signal at Bay St./Chestnut St. 				
 Develop Commercial St. bridge. Extend Commercial St. beyond Paper Ave. 	Develop Cornwall Ave./Log Pond Dr. bridge, including improvements to existing Cornwall Ave. and Maple St. and extend Log Pond Dr. to Bloedel Ave.				
 Develop Bay St. between Bloedel Ave. and Paper Ave. Upgrade traffic signal at Commercial St./Chestnut St. 	 Extend Log Pond Dr. to Oak St. Upgrade Maple St. at Cornwall Ave., State St. and Forest St., including traffic control. 				
Develop Paper Ave. connector from Bay St. to Oak St.	Develop Bloedel Ave. to connect with existing Cornwall Ave.				
Close Cornwall Ave. and remove existing bridge overpass at future railroad tracks location between Maple St. & Bloedel Ave.					
Extend Cornwall Ave. to Cornwall Beach Area					
Relocate railroadInstall Wharf St./State St. roundabout or traffic signal					
Develop Oak St. from Paper Ave. to Cornwall Ave.					

Source: Collins Woerman, 2008.

¹ Roads do not connect to Maple St. and Chestnut St. offsite.



The roadway network would include a range of street types that are intended to both functionally serve vehicle traffic and provide efficient pedestrian and bicycle opportunities. Features would include: street narrowing at certain street intersections for traffic calming, paving and sidewalk textures, landscaping, street trees and furniture and uniform signage to enhance the pedestrian environment.

The onsite rights-of-way for roads, pedestrian facilities, and open space under the Preferred Alternative are assumed to range from 45 feet in width to 220 feet in width, versus the 60 feet in width to 100 feet in width under DEIS Alternatives 1 - 3 (see **Appendix C** to this SDEIS for conceptual cross-sections illustrating the range of rights-of-way under the proposed onsite streets). Street types would include industrial, retail, residential, arterial, green, park and residential park streets (see **Appendix C** for details). As an example, Commercial St. is proposed as a "Green Street" which would include a park area within a 220-foot wide right-of-way; Ivy St. is proposed as a "Park Street", which would also include a park area within a 200-foot wide right-of-way.

2.3.3 Grading/Stormwater Management

Grading

Redevelopment under the Preferred Alternative would require grading for construction of infrastructure components, for remediation purposes, to accommodate potential long-term sea level rise, for parking structures, and to achieve suitable finish grades for building construction, similar to redevelopment under DEIS Alternatives 1 - 3. For purposes of analysis of Alternatives 1 - 3 in the DEIS, a preliminary grading concept was formulated (see DEIS Section 3.1.2 for a description of the preliminary grading concept).

A revised grading plan was prepared for the Preferred Alternative that is intended to be consistent with the revised roadway layout and stormwater management plan (see SDEIS **Section 3.1**, Earth, for the revised plan and representative cross-sections of the plan). Aspects of the revised grading plan under the Preferred Alternative that are somewhat different from the preliminary grading concept under DEIS Alternatives 1 - 3 are listed below, followed by the assumptions under DEIS Alternatives 1 - 3 in parenthesis.

• The proposed roadway infrastructure network in the site areas to the south of the Whatcom Waterway would be constructed at an elevation to accommodate planned environmental remediation and long-term sea level rise potential, provide an integrated slope between the site and the existing downtown, and match the first floor elevations of future onsite buildings. The revised grading plan assumes that the site roadways located to the south of the Waterway would be elevated approximately 6 to 11 feet above the existing site grade on average. Commercial St., Bay St. and Log Pond Dr. could be graded to higher elevations as the streets approach the grade separation over the railroad corridor adjacent to the bluff. Undeveloped parcels could be graded to provide a gentle slope to the new roadway stormwater drainage system, or stormwater would be pumped into the new roadway system. The roadway network in the areas to the north of the Waterway in the Marine Trades Area would be constructed closer to existing elevations to match existing grades at the intersections with Roeder Ave. and to accommodate the typical operational needs of marine industrial uses, which require ground elevations that consider tidal

conditions (under DEIS Alternatives 1 - 3 it is assumed that the majority of the site would be elevated 3 to 6 feet above the existing grade).

- It is estimated that up to approximately 70,000 cubic yards (CY) of cut and up to approximately 700,000 CY of fill could be required to implement the revised grading plan (up to approximately 63,000 to 76,000 CY of cut and up to approximately 680,000 to 700,000 CY of fill would be required to implement the preliminary grading concept under DEIS Alternatives 1 3).
- All new stormwater outfalls under the Preferred Alternative are assumed to be designed to an invert elevation of 13 to 15 feet in order to preclude any long-term sea level rise impacts or storm surge problems, except within the Marine Trades Area where outfall elevations may remain at approximately 12 to 13 feet (the outfall invert elevations assumed for DEIS Alternatives 1 - 3 are 11 feet).
- As discussed in the DEIS, cleanup plans for certain contaminated areas of the site could require placement of a soil or asphalt cap (capping with a layer of clean fill material or impervious surface over portions of the site). Based on ongoing investigation of the contaminated soils and coordination with the Department of Ecology, the depth of the cap would likely be reduced relative to what was assumed for Alternatives 1 3. In certain contaminated areas where the existing pavement would be demolished or a building would be removed, a soil and/or asphalt cap ranging from 6 inches to 2 feet in depth would be placed over the area. In other areas the existing pavement that would be retained or a new pavement layer would serve as the environmental cap (the DEIS assumes a minimum 2-foot depth for the cap over portions of the site).

See **Section 3.1**, Earth, **Section 3.3**, Water Resources and **Section 3.5**, Environmental Health of this SDEIS for more information on sea level rise, the proposed stormwater system and the status of cleanup activities on the site, respectively.

Stormwater Management

For purposes of analysis in the DEIS, a stormwater management plan and certain assumptions were formulated, including the features and configuration of the stormwater system with redevelopment under Alternatives 1 - 3 (see DEIS Section 3.3 and DEIS Appendices F and G for details on the system). A revised stormwater management plan was developed for the Preferred Alternative, based on ongoing coordination between the Port and the Department of Ecology, the City of Bellingham and other interested parties (see **Appendix H** to this SDEIS for details on the revised plan). The following key design assumptions that were used in developing the stormwater management plan for DEIS Alternatives 1 - 3 also pertain to the revised plan for the Preferred Alternative:

• The interim and permanent stormwater management systems would comply with all applicable provisions of the Department of Ecology Stormwater Management Manual for Western Washington (2005) and applicable City of Bellingham requirements. All stormwater from pollution-generating surfaces would be collected and treated to Basic water quality treatment standards, per the Ecology Manual (2005), as adopted by the City.

- Existing conveyance pipes that pass offsite runoff through the site to existing outfall structures would remain in operation and would be independent of the new onsite conveyance and discharge system for runoff from onsite redevelopment (see discussion of the Laurel St. stormwater pipe below).
- Stormwater conveyance and treatment facilities would be installed concurrently with the construction of the roadway network.
- An environmental cap would be placed over certain contaminated areas of the site (via a clean soil layer and/or placement of impervious surfaces); it is expected that the proposed stormwater system would be installed above the cap and would not encroach into contaminated soil. Otherwise, the system may need to be installed in a utility corridor with clean fill and appropriate separation from adjacent and underlying contaminated soils.
- Eight new outfalls to the Bellingham Bay (or the Whatcom Waterway) would be constructed. Outfalls would be designed to prevent any conveyance problems, localized flooding or scouring of the Bay or Waterway. The location of new stormwater outfalls near existing outfalls is intended to minimize the potential for impacts to fish and wildlife.

Several features of the proposed stormwater management system under the Preferred Alternative would differ from or expand upon the conceptual stormwater plan assumed under DEIS Alternatives 1 - 3, as discussed below.

The DEIS recognized that the infrastructure system (including the onsite stormwater system) would be constructed on a phased basis. The proposed stormwater management system under the Preferred Alternative establishes a plan for stormwater runoff conveyance and treatment during the interim phase of New Whatcom redevelopment (subsequent to construction of the primary roadway network, yet prior to full buildout of all development parcels). As indicated previously, the roadway grid would be raised 6 to 11 feet above existing grades in the site areas to the south of the Whatcom Waterway. Parcels between the roadway segments in these site areas would eventually become building pads. Prior to building development, these undeveloped areas would either be graded to provide a gentle slope toward the roadway stormwater system, or stormwater runoff would be pumped to the roadway system. If parcels are unused on an interim basis, runoff from the undeveloped areas would be essentially clean and treatment would not likely be required. If parcels are used for parking on a temporary basis, appropriate treatment would be provided prior to runoff entering the roadway stormwater system.

Other differences between the proposed stormwater system under the Preferred Alternative and the system assumed under DEIS Alternative 1 - 3 include:

- The existing City of Bellingham stormwater pipe in Laurel St., which conveys offsite runoff through the site, would need to be relocated through a portion of the site due to the proposed layout of the onsite road network. The pipe could be relocated along the new Bloedel Ave. and Commercial St. to its current outfall in order to be aligned with the proposed roadway network
- The proposed basin boundaries, grading plan and Log Pond outfall location (a new outfall) would be revised to coordinate with the proposed roadway network.

- Proposed water quality treatment for the roadway network would be via low-impact bioretention units or media filtration cartridge vaults. Both of these options are consistent with the Basic treatment criteria of the Ecology Manual and bioretention facility option analyzed in the DEIS.
- Two options for the specific design of the stormwater drainage system are proposed and analyzed in this SDEIS: Option 1 proposes two parallel stormwater systems in order to separate non-pollution generating (i.e. building roofs) surface runoff from pollution generating (i.e. roads) surface runoff (this dual-system option was not analyzed in the DEIS); Option 2 proposes a single stormwater system (this option is similar to the system analyzed in the DEIS). Option 1 would be considered a LEED Neighborhood Development opportunity by allowing the potential reuse of "clean" runoff as a water feature or landscape design element.

(See **Section 3.3**, Water Resources and **Appendix H** to this SDEIS for further information on the revised stormwater system.)

2.3.4 Parks and Shoreline Habitat Plan

Under the Preferred Alternative, approximately 15 to 20 acres of the site would be reserved for public parks, trails and habitat areas by 2016, and approximately 33 acres of the site would be reserved by 2026, similar to under DEIS Alternative 1 (see **Figures 2-4** and **2-5** and **Table 2-3**). At 2016, it is assumed that parks, trails and habitat areas within the Cornwall Beach Area, Marine Trades Area, and within the Marina would be fully developed. Other areas south of the Whatcom Waterway (including the Downtown Waterfront and the Log Pond Areas) would contain a portion of the parks, trails, and habitat improvements to be built in these areas. Fifteen to 20 acres of the overall park, trail and habitat network would be developed by 2016.

The full buildout of the parks, trails, and habitat areas on the site (approximately 33 acres) would occur by 2026. It should be noted that the Commercial St. Green area north of Paper Ave. is included within the total 33 acres of parks/open space that would be provided on the site; the portion of the Green south of Paper Ave. is assumed to be constructed as part of future development projects and is not included in the 33-acre total (see **Figure 2-5**).

The following is a breakdown of the proposed parks/open space proposed under the Preferred Alternative by site redevelopment area by 2026:

•	Marine Trades Area	7.5 acres
•	Downtown Waterfront Area	8.8 acres
•	Log Pond Area	6.2 acres
•	Shipping Terminal Area	0.3 acres
•	Cornwall Beach Area	10.3 acres
		33.1 acres

See **Appendix A** for details on proposed park, trail and habitat features within each redevelopment area.

The Preferred Alternative features a refinement of the parks, trails and habitat network described in the DEIS. Similar to under DEIS Alternatives 1 - 3, the proposed parks, open space and trails would be provided in a variety of configurations, allowing for a wide range of

passive and active opportunities. Multiple public access opportunities would be available along the waterfront and linkages to the existing (and developing) regional system of trails would be afforded. The majority of the site's shoreline would be dedicated to public access and amenities. The specific design of the parks and open spaces would be determined as part of future planning and design efforts by the Port and City.

There would be limited differences between the parks, trails and open space network under the Preferred Alternative and that assumed under DEIS Alternative 1; differences would include changes in the trail system in the Marine Trades Area, the configuration of the parks and trail network in the Downtown Waterfront Area, and the inclusion of the "community green" areas as public gathering places. These community greens (along Commercial St. and Log Pond Dr.) would allow connections through the site to the waterfront and downtown, providing additional pedestrian access pathways from both on and offsite areas (see **Appendix A** to this SDEIS for details). The community greens would also serve as view corridors which would allow for views through the site, and to the waterfront, the Bay and beyond in one direction and back to downtown in the other direction. In addition to the designated public parks and open spaces, there would also likely be privately-sponsored open space elements of future redevelopment projects, such as courtyards, plazas and other open space areas.

Shoreline Master Program

As the DEIS describes in Chapter 2, Section 2.8.2, 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 DEIS indicates that the City is updating its SMP; the updating of the SMP is still in process. For purposes of the DEIS, it is assumed that the updated SMP regulations would be adopted prior to commencement of the New Whatcom redevelopment activities in the shoreline area, except for the development of the marina at the remediated ASB and its associated facilities, which would be consistent with existing shoreline regulations. The assumptions in the DEIS relative to the SMP are also valid for this SDEIS. Features of the New Whatcom project within the shoreline jurisdiction under the Preferred Alternative would be consistent with the current staff recommendations for the Draft SMP update (applicable provisions relate to standards for permitted uses, buffers and setbacks, height and public access). Any future redevelopment within the site's shoreline area (with the exception of the marina, which is assumed to be regulated under the existing SMP) would be required to be consistent with adopted City of Bellingham SMP regulations.

Shoreline Habitat Plan

As indicated in the DEIS, one of the Port's objectives for the Waterfront District is to "identify opportunities to restore, enhance and create habitat along the waterfront environment within the context of creating an economically-viable redevelopment." Restoration of shoreline habitat is assumed under DEIS Alternatives 1 - 3. Shoreline habitat features planned for each redevelopment area under Alternatives 1 - 3 are described in DEIS Chapter 2, Section 2.8.2; DEIS Figures 2-16 through 2-28 provide conceptual illustrations of potential redevelopment within various areas of the site under the shoreline jurisdiction. The extent and type of redevelopment within the site's shoreline environment would vary among DEIS Alternatives 1 -

3, due primarily to the variation in the size and configuration of the assumed shoreline parks and trails.

The overall approach to redevelopment of the shoreline environment under the Preferred Alternative would be similar to under DEIS Alternatives 1 - 3. The mixed-use character of the proposed redevelopment would increase public access, improve aquatic habitat and establish compatible waterfront uses along the shoreline (see **Appendix A** for details). Since issuance of the DEIS, ongoing master planning has resulted in more specific definition of a shoreline habitat plan for the Waterfront District. Two major types of shoreline habitat areas are included in the Preferred Alternative: nearshore habitat and fringe habitat. Fringe habitats include Terraced Shoreline, Beach, Rocky Shoreline and Marina Breakwater habitats. Conceptual cross-sections of these potential habitat types along the site's shoreline are presented in **Figures 2-7** through **2-13.** In particular, these illustrations represent further refinements to the marine buffer areas and treatment of the shoreline edge, and describe the functions and features of the different habitats that are intended to be achieved. These sections also represent the relationships between habitat area, parks and developed areas of the site.

2.3.5 In-water Work

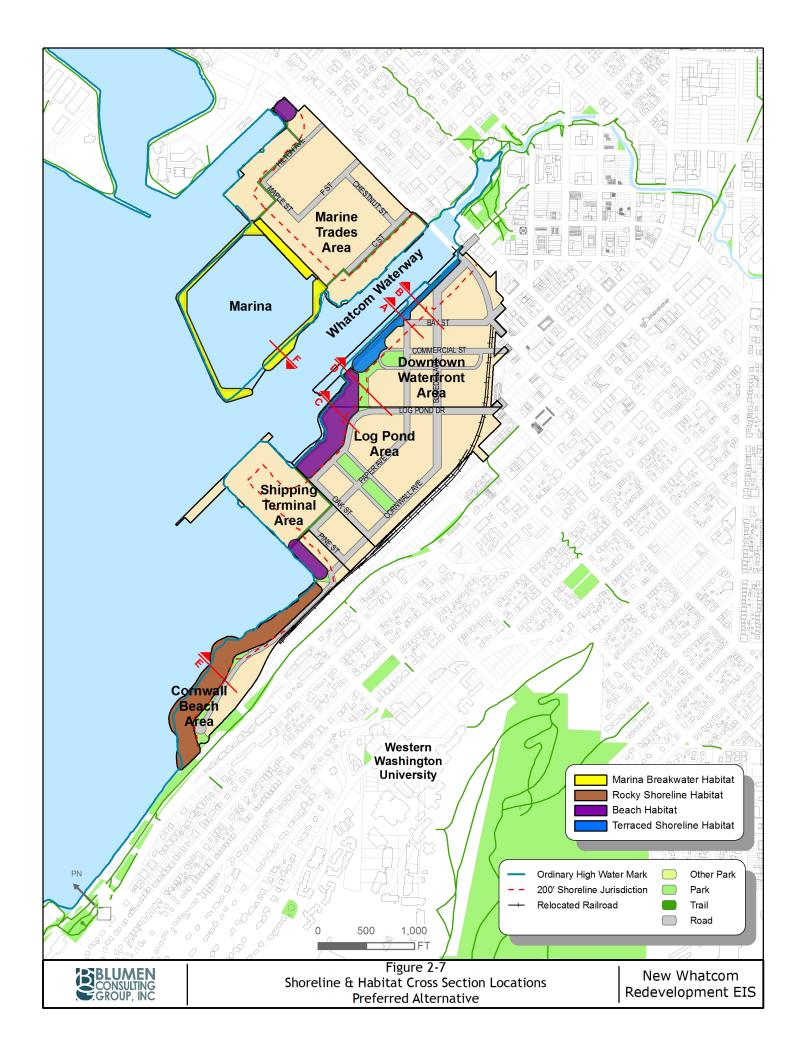
As described in the DEIS, redevelopment under Alternatives 1 - 3 would include several inwater features, including a marina in the ASB basin (subsequent to cleanup actions as described in DEIS Chapter 2, Section 2.3.1), restoration of a natural shoreline along the southern side of the Whatcom Waterway and transient moorage facilities within the Whatcom Waterway (see DEIS Chapter 2, Section 2.8.2 for description of these features). The Preferred Alternative would also include these in-water features; however, certain aspects of these features would differ from those described under DEIS Alternatives 1 - 3, as described below.

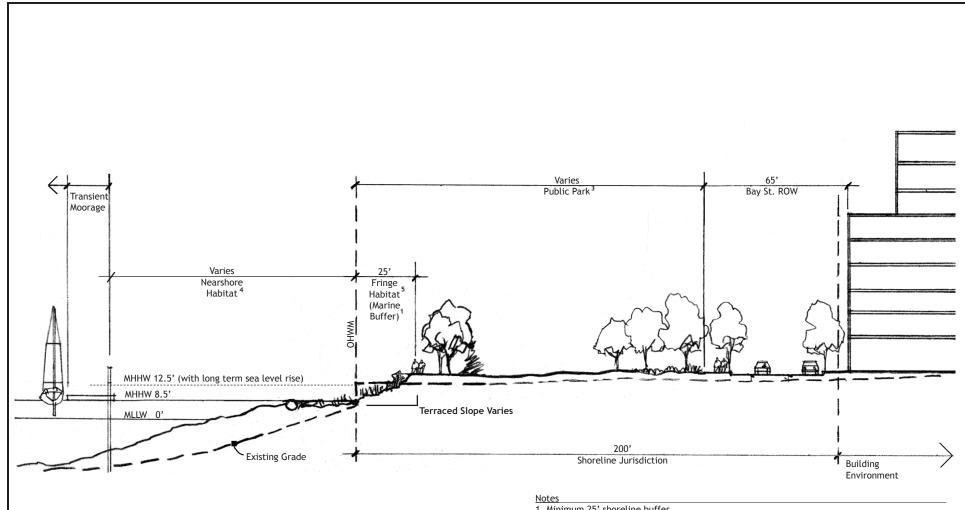
Marina Concept A

As part of the Preferred Alternative, the Port would develop a marina with up to 460 boat slips in association with mixed-use redevelopment, similar to Marina Concept A under Alternatives 1 - 3 described and evaluated in the DEIS (see DEIS Chapter 2, Section 2.8.2 for a description of Marina Concept A). The DEIS No Action Alternative would also include a marina (Marina Concept B); this marina would feature up to 600 boat slips (see DEIS Chapter 2, Section 2.8.4 for a description of Marina Concept B).

Key features of the marina under the Preferred Alternative that are different from those under DEIS Alternatives 1 - 3 are listed below, followed by the assumptions for the marina under DEIS Alternatives 1 - 3 in parenthesis. See **Figure 2-14** for a depiction of the marina under the Preferred Alternative.

 The parking lot for marina users, located adjacent to the northeast corner of the marina, would include up to 240 spaces (the parking lot in this area under DEIS Alternatives 1 - 3 would feature up to 280 spaces).





- 1. Minimum 25' shoreline buffer.
- 2. The shoreline jurisdiction extends both landward and waterward of the OHWM.
- 3. A public park includes a combination of trees, plants & shrubs with grassy areas; hard surfaced walkways & bikeways with street furniture.
- 4. Nearshore Habitat includes sloping intertidal and shallow subtidal marine habitats, utilizing soft bank techniques. Substrate may consist of sand/mud/cobble depending on slopes and wave energy; higher energy areas may include gravel or rocky shore habitats. Habitat suitable for colonization by eel grass and/or macroalgae. Habitat provides important forage and refuge functions for juvenile salmonids and other fisheries resources.
- 5. Fringe Habitat includes sloping fringe habitat in high intertidal and adjacent areas. Substrate characterized by rocky shore conditions, suitable for colonization of native salt-tolerant vegetation.



Source: CollinsWoerman/Anchor Environmental

Conceptual: For Illustriative Purposes Only

OHWM - Ordinary High Water Mark

MHHW - Mean High Water Mark

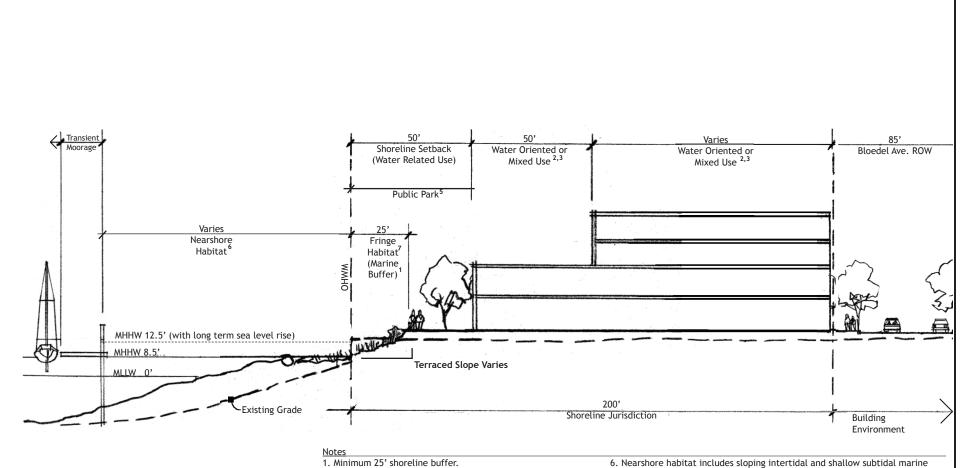
MLLW - Mean Low Water Mark

ROW - Right of Way



Figure 2-8 Section A - Terraced Shoreline Habitat Preferred Alternative: 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

- 2. Based upon proposed SMP, water-oriented uses within shoreline jurisdiction could be 35' in height outright (50' with view analysis).
- 3. Based upon proposed SMP, mixed-use buildings within this area area are limited to 25' in height plus one additional foot height for each additional two-feet of setback to a maximum of 35' in height outright (50' with view analysis).
- 4. The shoreline jurisdiction extends both landward and waterward of the OHWM.
- 5. A public park includes a combination of trees, plants & shrubs with grassy areas; hard surfaced walkways & bikeways with street furniture.
- 6. Nearshore habitat includes sloping intertidal and shallow subtidal marine habitats, utilizing soft bank techniques. Substrate may consist of sand/mud/cobble depending on slopes and wave energy; higher energy areas may include gravel or rocky shore habitats. Habitat suitable for colonization by eel grass and/or macroalgae. Habitat provides important forage and refuge functions for juvenile salmonids and other fisheries resources.
- 7. Fringe habitat includes sloping fringe habitat in high intertidal and adjacent areas. Substrate characterized by rocky shore conditions, suitable for colonization for native salt-tolerant vegetation.



Source: CollinsWoerman/Anchor Environmental



Figure 2-9
Section B - Terraced Shoreline Habitat
Preferred Alternative: 2026

New Whatcom Redevelopment EIS

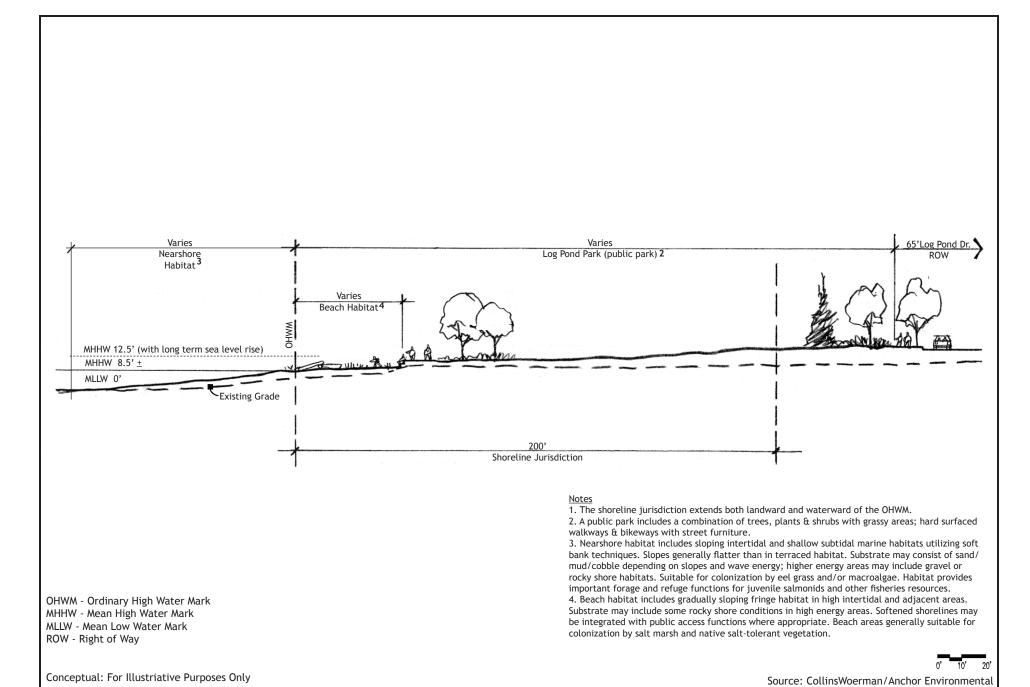


Figure 2-10

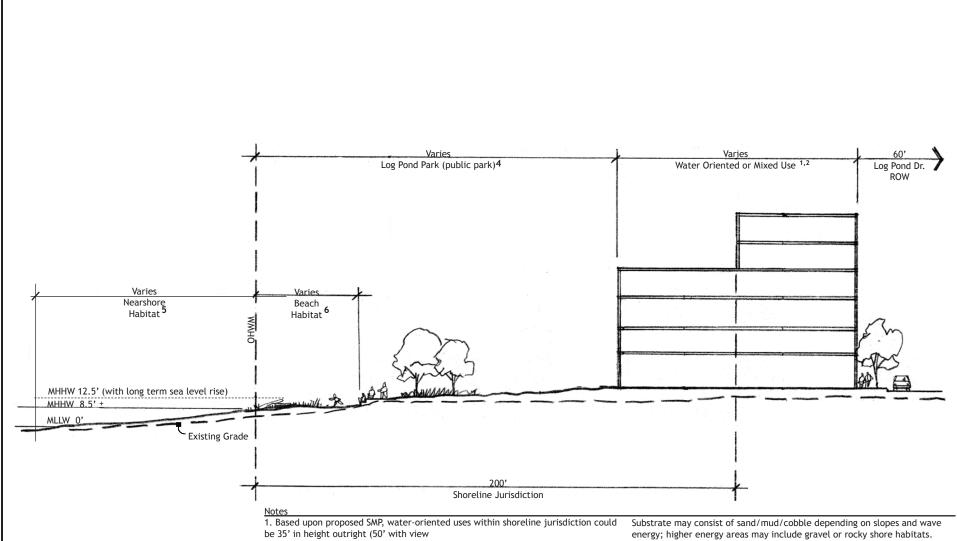
Section C - Beach Habitat

Preferred Alternative: 2026

New Whatcom

Redevelopment EIS

BLUMEN CONSULTING GROUP, INC



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

Conceptual: For Illustriative Purposes Only

- 2. Based upon proposed SMP, mixed-use buildings within this area area limited to 25' in height plus one additional foot height for each additional two-feet of set-
- back to a maximum of 35' in height outright (50' with view analysis). 3. The shoreline jurisdiction extends both landward and waterward of the OHWM.
- 4. A public park includes a combination of trees, plants & shrubs with grassy areas; hard surfaced walkways & bikeways with street furniture.
- 5. Nearshore habitat includes sloping intertidal and shallow subtidal marine habitats utilizing soft bank techniques. Slopes generally flatter than in terraced habitat.

Suitable for colonization by eel grass and/or macroalgae. Habitat provides important forage and refuge functions for juvenile salmonids and other fisheries resources.

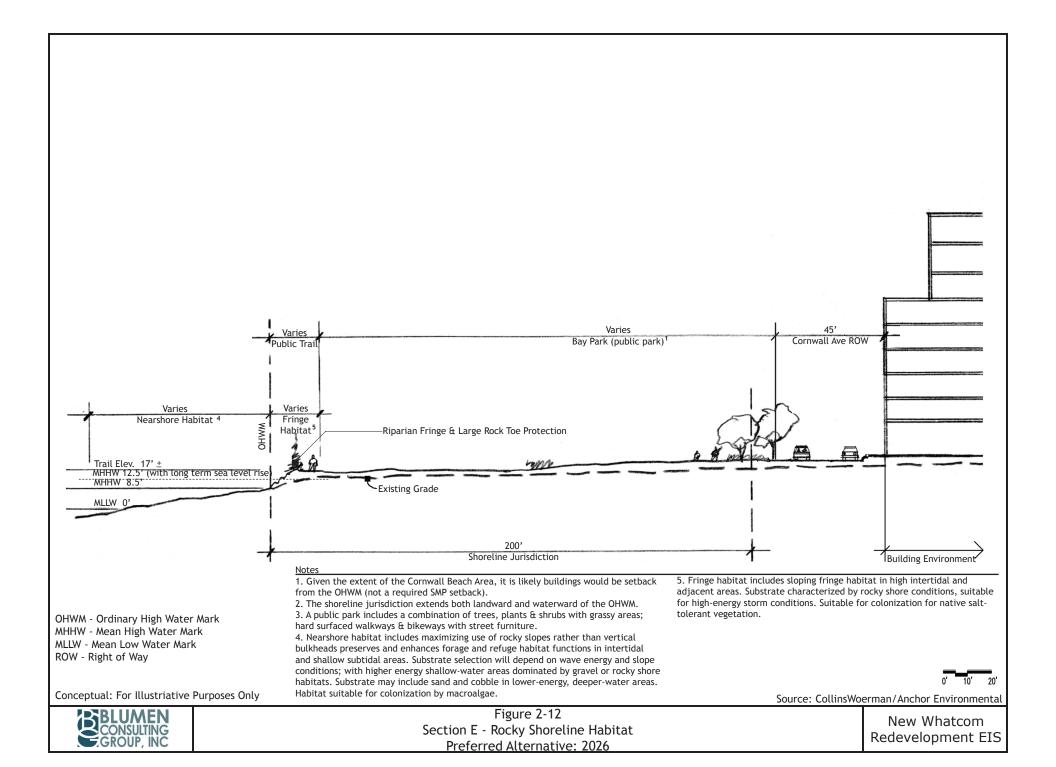
6. Beach habitat includes gradually sloping fringe habitat in high intertidal and adjacent areas. Substrate may include some rocky shore conditions in high energy areas. Softened shorelines may be integrated with public access functions where appropriate. Beach areas generally suitable for colonization by salt marsh and native salt-tolerant vegetation.

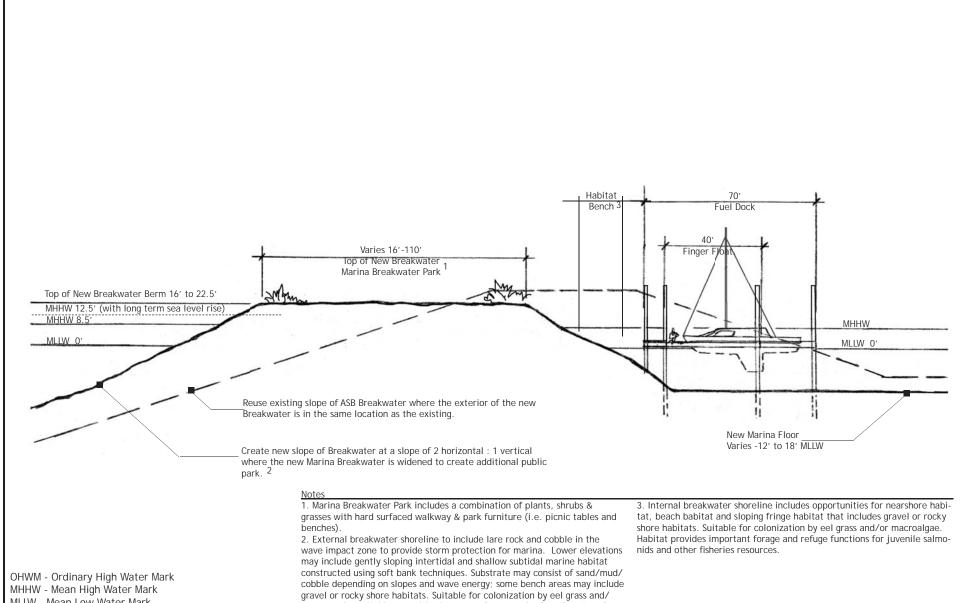
Source: CollinsWoerman/Anchor Environmental



Figure 2-11 Section D - Beach Habitat Preferred Alternative: 2026

New Whatcom Redevelopment EIS





MLLW - Mean Low Water Mark

ROW - Right of Way

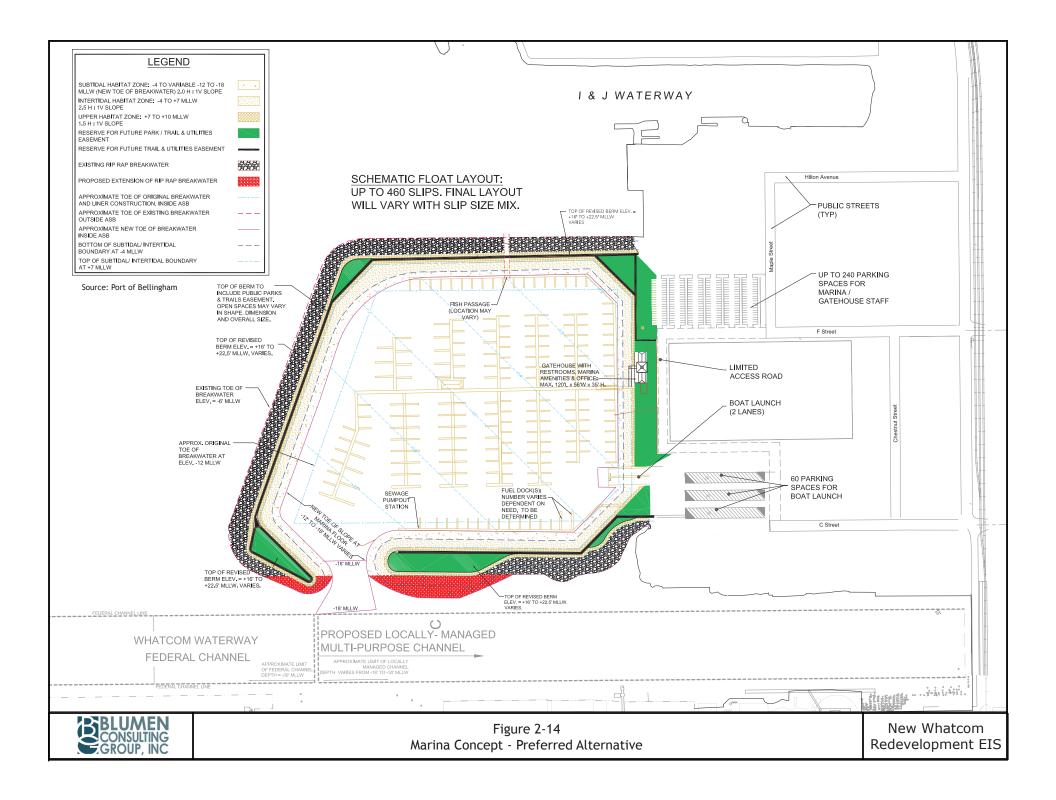
or macroalgae. Habitat provides important forage and refuge functions for juvenile salmonids and other fisheries resources.



Source: CollinsWoerman/Anchor Environmental



Conceptual: For Illustriative Purposes Only



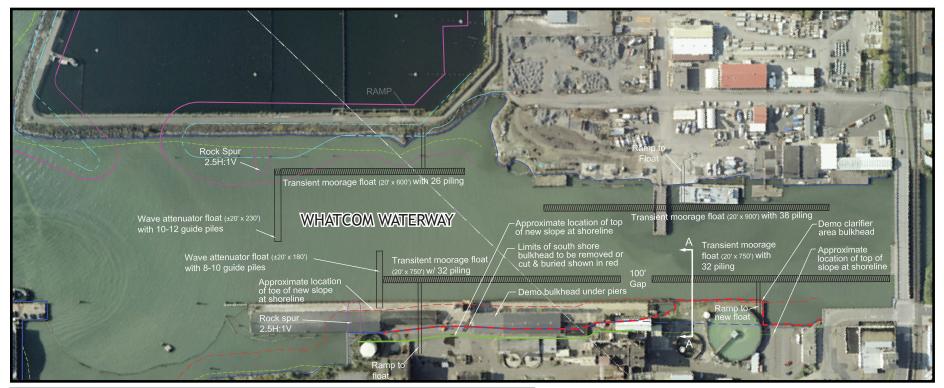
- The marina would include construction of a two-lane boat launch ramp inside the marina basin with an associated 60-stall upland boat trailer parking area located adjacent to the southeast corner of the marina. This boat launch would be in addition to the Port's existing four-lane boat launch located within the Squalicum Harbor (under DEIS Alternatives 1 3, the marina would include construction of a five to eight-lane boat launch inside the marina basin with an associated 90-stall upland boat trailer parking area located adjacent to the southeast corner of the marina. This boat launch was assumed to replace the Port's existing four-lane boat launch located within the Squalicum Harbor with DEIS Alternatives 1 3).
- A curb-side drop-off and loading zone would be provided in conjunction with the marina parking lot (DEIS Alternatives 1 - 3 assumed that a 40 space marina loading zone and short-term parking area would be provided in this location).

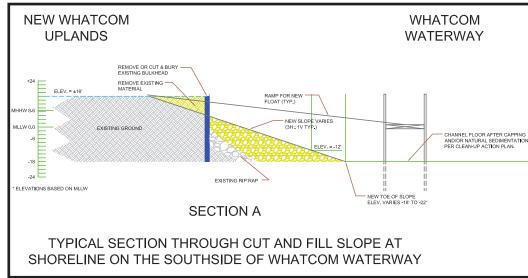
Other aspects of the marina that would be developed under the Preferred Alternative would be similar to those under DEIS Alternatives 1 - 3, including the provision of: substantial new marine habitat in Bellingham Bay, open space/park areas around the marina, and a pedestrian trail easement around the perimeter of the marina (approximately 0.6 mile in length under the Preferred Alternative).

Restoration of a Natural Shoreline along the Whatcom Waterway

A major element of redevelopment under DEIS Alternatives 1 - 3, as well as under the Preferred Alternative, would be the restoration of a natural shoreline, soft beach and marine habitat area along the southern edge of the Whatcom Waterway. Restoration of the natural shoreline would require removal of portions of the existing wharf, bulkhead and other associated features in this portion of the site (see DEIS Chapter 2, Section 2.8.2 for details). A typographical error was inadvertently made in the DEIS regarding the specific amount of shallow water coverage that would be eliminated with removal of the bulkhead (and associated rip rap) in the eastern portion of the waterway. This area is comprised of the clarifier area bulkhead. The shallow water coverage to be eliminated would be 18,900 square feet, rather than the 1,890 square feet indicated in the Draft EIS. All other aspects of the restoration of the natural shoreline along the southern side of the waterway under the Preferred Alternative would be the same as under DEIS Alternatives 1 - 3, including restoration of approximately 1,500 linear feet of shoreline to create approximately 2.4 acres of new natural shoreline and beach area, and approximately one acre of upland open space (see **Figure 2-15** for the improvements along the Whatcom Waterway under the Preferred Alternative).

It should be noted that additional shoreline restoration is planned by the Port along the north side of the Whatcom Waterway. Redevelopment of this portion of the Whatcom Waterway is described in the DEIS as a Separate Action, because it is expected to occur regardless of whether the redevelopment project is approved and implemented (see DEIS Chapter 2, Section 2.9.1 for details). Based on the Port's most current plans, restoration of the north side of the Waterway is expected to include removal of dilapidated bulkheads and industrial shoreline structures, and re-shaping of the shoreline to support new habitat and water access features (e.g. transient moorage floats) similar to those described for the south side of the Waterway. Further design details for shoreline restoration on the north side of the Waterway are being developed under the Whatcom Waterway cleanup and marina project.







Transient Moorage within the Whatcom Waterway

Similar to DEIS Alternatives 1 - 3, the Preferred Alternative proposes visitor moorage floats within the Whatcom Waterway to complement mixed-use redevelopment on the site. These floats would be located parallel to the north and south shorelines of the Waterway and would be accessed from the shore via ramps (see DEIS Chapter 2, Section 2.8.2 for details). An inadvertent error was made in the description of the floats along the south side of the Waterway in the DEIS. Two 750-foot long by 20-foot wide floats, each with associated 120-foot long, 10-foot wide ramps are proposed, versus the two 1,500-foot long ramps indicated in the DEIS. The floats on the north side of the Waterway are correctly described in the DEIS and have not changed.

In addition to the transient moorage features described in the DEIS for Alternatives 1 - 3, the Preferred Alternative would also include wave attenuators and rock groins within the Waterway in order to provide calmer water for moorage. **Figure 2-15** shows these proposed improvements. The wave attenuator system for the south side floats would be comprised of an approximately 180-foot by 20-foot deep draft float with eight to ten piles and a rock groin extending from the shore approximately 150 feet into the Waterway. The wave attenuator system for the north side floats would be comprised of an approximately 230-foot by 20-foot draft float with 10 to 12 piles and a rock groin extending from the shore approximately 150 feet into the Waterway. Pedestrian access ramps could be provided, if feasible, to allow seasonal public use on both the north and south side wave attenuator floats.

2.3.6 Sustainable "Green" Design

The Port is committed to implementing sustainable "green" design strategies in the Waterfront District. As indicated in DEIS Chapter 2, Section 2.7.1, the Port is participating with the City in the Leadership in Energy and Environmental Design for Neighborhood Development (LEED-ND) Pilot Program (see **Appendix A** to this SDEIS for more information about the LEED-ND Program). As part of this program, the Port and City are working with agencies, businesses and organizations regarding potential incorporation of certain energy conservation measures, stormwater design measures to reduce impervious surfaces and provide innovative water quality treatment techniques, and other building, transportation and engineering measures related to sustainability.

Since issuance of the DEIS, the Port has further defined the potential sustainable design features that could be incorporated into the Preferred Alternative. These could include: water conservation (i.e. reclaiming/reusing water for non-potable purposes), energy generation (i.e. via solar power, ocean power, wind power, micro hydro power, biomass energy and/or mining waste heat), greenhouse gas emission reduction (i.e. by implementing compact development and efficient transportation systems), wastewater treatment (i.e. via membrane bio reactors or equivalent system) and stormwater management strategies (see **Appendix A** to this SDEIS for details).

As an example, the proposed stormwater management concept described in this SDEIS is intended to introduce specific LEED certified elements into the project, including the following:

• Two parallel stormwater systems could be installed (Option 1) that would separate the non-pollution-generating runoff from the pollution-generating runoff. With proper

permitting, this option would present an opportunity for rainwater harvesting and reuse (including for landscape irrigation and other non-potable functions).

- Stormwater wetlands or biofiltration swales could be installed in certain areas of the site that would meet requirements for water quality treatment while using low-impact, natural processes for filtration that could also serve as landscape design features.
- Low-impact bioretention units could be employed for water quality treatment of runoff from pollution-generating surfaces.

(See **Section 3.3**, Water Resources, and **Appendix H** to this SDEIS for details on stormwater management elements.)

2.3.7 Historic Buildings

The New Whatcom site currently contains buildings and structures associated with Georgia-Pacific's (GP) past activities, Port of Bellingham's operations, Puget Sound Energy facilities and other marine and/or industrial uses. Of the 36 existing buildings remaining on the New Whatcom site², the historic property survey prepared for the DEIS identified 22 buildings and structures that are at least 40 years of age (the period of 40 years or older was used to include buildings close to reaching the 50-year threshold for eligibility as a National Register of Historic Places (NRHP) resource; see DEIS Section 3.11 and Appendix L to the DEIS for details). For analysis purposes, the DEIS assumed that 17 of the 22 existing buildings and structures at least 40 years of age could potentially be removed, leaving five buildings assumed to be retained with redevelopment under Alternatives 1 - 3. The five buildings/structures assumed to be retained in the DEIS are listed below, followed by the Port's assigned number for the building and an indication of "eligible", if it was concluded in the DEIS that it is potentially eligible for National Register of Historic Places (NRHP), Washington Heritage Register (WHR), and/or City of Bellingham Local Landmarks Register (BLLR) listing (see Appendix L to the DEIS for further descriptions of these buildings and their potential eligibility). Ultimately, the State Department of Archaeology and Historic Preservation would provide a formal opinion as to the potential eligibility and listing status of onsite resources. Four of the five buildings/structures listed below are located north of the Whatcom Waterway.

- Office, Bellingham Builders Supply Company (3, eligible)
- Kodiak Fish Co. Building (4)
- Shipping Terminal Pier (no Port #, number 8 in the Historic Property Resources report Appendix L to the Draft EIS)
- Building J/Storage Unit (9B)
- Vitamins Inc. Building (10).

The DEIS noted that the final decisions on removal or retention/reuse of buildings would be made by the Port and City in conjunction with developers. Since issuance of the DEIS in January 2008, the Port has continued to work with the City and other entities to assess strategies and considerations for mitigating potential impacts on historic resources (see **Appendix A** and **Section 3.11**, Historic and Cultural Resources of this SEIS for details).

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² Includes only those buildings assumed to remain on the site subsequent to completion of the Georgia-Pacific Demolition Plan.

Under the Preferred Alternative, the same five buildings noted above that are 40 years of age or older could potentially be retained or reused in some capacity with redevelopment of the site. An additional five buildings have been identified that could potentially be retained, reused or relocated/preserved in some manner under the Preferred Alternative (in some cases this could include relocation or reuse of building materials or industrial equipment/features); these are listed below (see Appendix L to the DEIS for further descriptions of these buildings). Additional analysis would determine the viability of reuse/relocation, with consideration of structural, economic, environmental and locational factors.

- Old Granary (7, eligible)³
- Barking/Chipping Plant (8, eligible)
- Boardmill (12, eligible)
- Digester (13, eligible)
- High Density Tanks (49, eligible).

In addition, since issuance of the DEIS, the Port has identified three buildings that are at least 40 years of age for potential demolition in the near-term, subject to applicable permits. The Port issued a Mitigated Determination of Non-Significance (MDNS) for this demolition on October 1, 2008. Mitigation requirements specific to these buildings include: inventorying of GP archives, building documentation and recordation, a salvage and reuse plan, and an interpretation plan. Demolition is intended to occur in conjunction with near-term GP demolition activities. These buildings include:

- Screen Room (14, eligible)
- Bleach Plant (15, eligible)
- Pulp Storage Building (37, eligible).

2.3.8 View Corridors

A view corridor is a field of vision, shaped by the surrounding natural and built environment, intended to preserve a specific view of an object or scenery. There are no view corridors specifically identified in the DEIS for Alternatives 1 - 3. However, under DEIS Alternatives 1 - 3 certain of the roadway rights-of-way through the site would represent a continuation of the existing downtown street grid and could provide opportunities for views through the site to Bellingham Bay and the Whatcom Waterway (see DEIS Section 3.10, Aesthetics/Light and Glare for details).

Since issuance of the DEIS, the Port has continued the master planning process, including the identification of proposed formal view corridors through the site (see **Appendix A** to this SDEIS for details). The Preferred Alternative is intended to preserve and enhance visual connections to Bellingham Bay, Whatcom Waterway and the waterfront from the New Whatcom site, the Central Business District (CBD), Old Town and the Lettered Streets areas. Two types of view corridors are proposed under the Preferred Alternative to provide views through the site:

• <u>View corridors defined by rights-of-way and open space</u>. These view corridors would provide uninterrupted views to the water from the CBD, Old Town, and

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³ If this building is ultimately retained under the Preferred Alternative, the access from Central Ave. to Roeder Ave. could be moved to the south.

Lettered Street neighborhoods along roadway rights-of-way and designated open space areas. These view corridors would occur along roadway rights-of-way (i.e. along Bay St., Oak St., Log Pond Dr., C St., F St., and Hilton St.) and along open space corridors (i.e. Commercial St. Green and Ivy St. Green). Development regulations could call for facade setbacks at upper stories of buildings to enhance the view potential (see **Section 3.10**, Aesthetics/Light and Glare in this SDEIS for more information on view corridors and the discussion below under **Development Regulations**).

• View corridors defined by a combination of rights-of-way and building height limitations. These corridors would consist of a combination of rights-of-way and building height limitations to provide views extending from the existing street grid in downtown to the water. Building heights would be limited to a maximum of 35 feet in those portions of the corridor areas which are not located in rights-of-way. The intent of these corridors is to provide view opportunities similar to that provided by a theoretical uninterrupted extension of these roadways through the site to the water. Development regulations could call for facade setbacks at upper stories of buildings to enhance the view potential (see discussion below under **Development Regulations**).

The onsite rights-of-way for roads, pedestrian facilities and open space under the Preferred Alternative are assumed to range from 45 feet in width in the Marine Trades Area to 220 feet in width elsewhere in certain areas onsite, versus the 60 feet in width to 100 feet in width under DEIS Alternatives 1 - 3 (see **Appendix C** to this SDEIS for depictions of the proposed rights-of-way). Commercial St. is proposed as a "Green Street", with a 220-foot wide right-of-way which includes a park area; Ivy St. is proposed as a "Park Street", with a 200-foot wide right-of-way. The additional width and open nature of these rights-of-way would enhance the visual connections through the site to the Bay/waterfront and to downtown.

See **Section 3.10**, Aesthetics/Light and Glare in this SDEIS for further discussion of view corridors and visual impacts under the Preferred Alternative. The preliminary Development Regulations included as **Appendix D** to this SDEIS address view corridor standards in each of the five primary redevelopment areas.

2.3.9 Development Regulations

As indicated in the **Fact Sheet** and earlier in this Chapter, the Proposed Actions include adoption of Development Regulations for the Waterfront District. Since issuance of the DEIS, the Port has prepared a preliminary set of Development Regulations for the Preferred Alternative (see **Appendix D** to this SDEIS). These preliminary regulations describe more specific requirements for the types of permitted uses, project density, building heights and other general standards (i.e. parking, shoreline setbacks, view corridors, building spacing, landscaping and street level uses) for each redevelopment area of the site (Marine Trades, Downtown Waterfront, Log Pond, Shipping Terminal, and Cornwall Beach). The Preferred Alternative concept has been formulated to be consistent with these preliminary regulations. The regulations will continue to be refined by the Port and the City and will ultimately be reviewed and considered by the Bellingham City Council.

2.3.10 Pedestrian Bridge Over Whatcom Waterway

A pedestrian bridge is proposed over the Whatcom Waterway under DEIS Alternatives 1 and 2/2A. This bridge would generally be aligned with the Laurel St. right-of-way, and connect the proposed trail system north of the waterway with the proposed trail system south of the waterway (see DEIS Chapter 2, Section 2.8.2 for details on the bridge). Under the Preferred Alternative, a pedestrian bridge over the Whatcom Waterway is <u>not</u> proposed. A pedestrian connection between the site areas to the north and south of the Whatcom Waterway would continue to be provided along Roeder Ave., however.

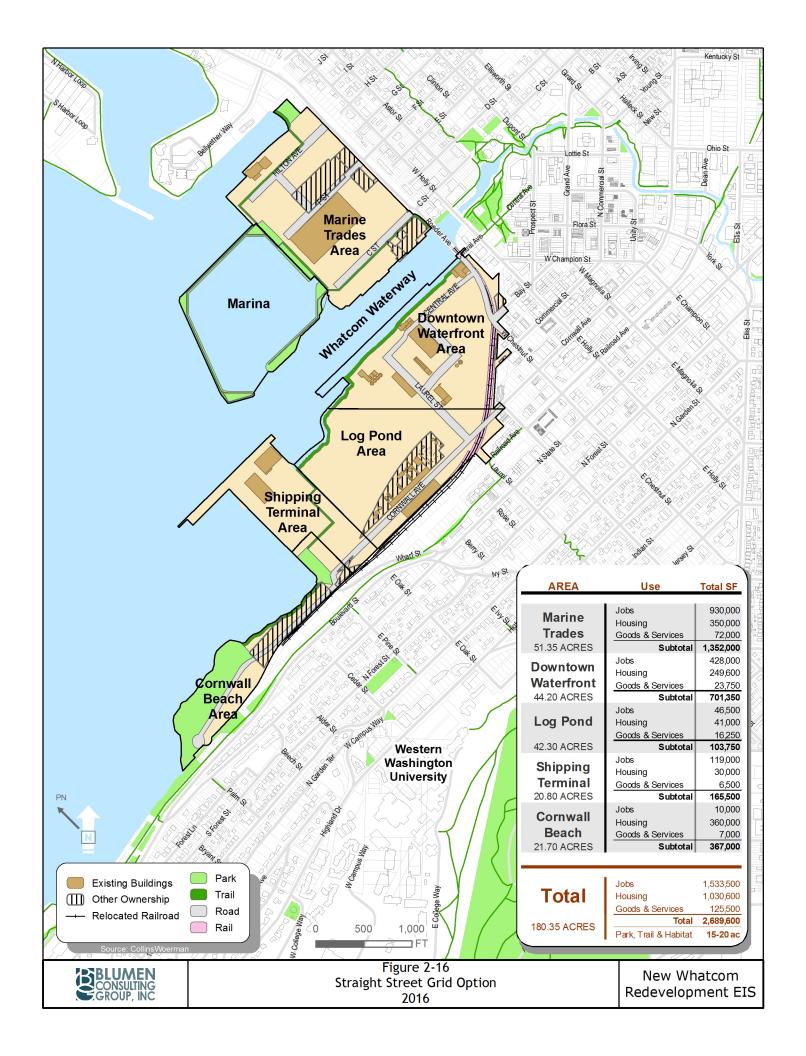
2.4 STRAIGHT STREET GRID OPTION

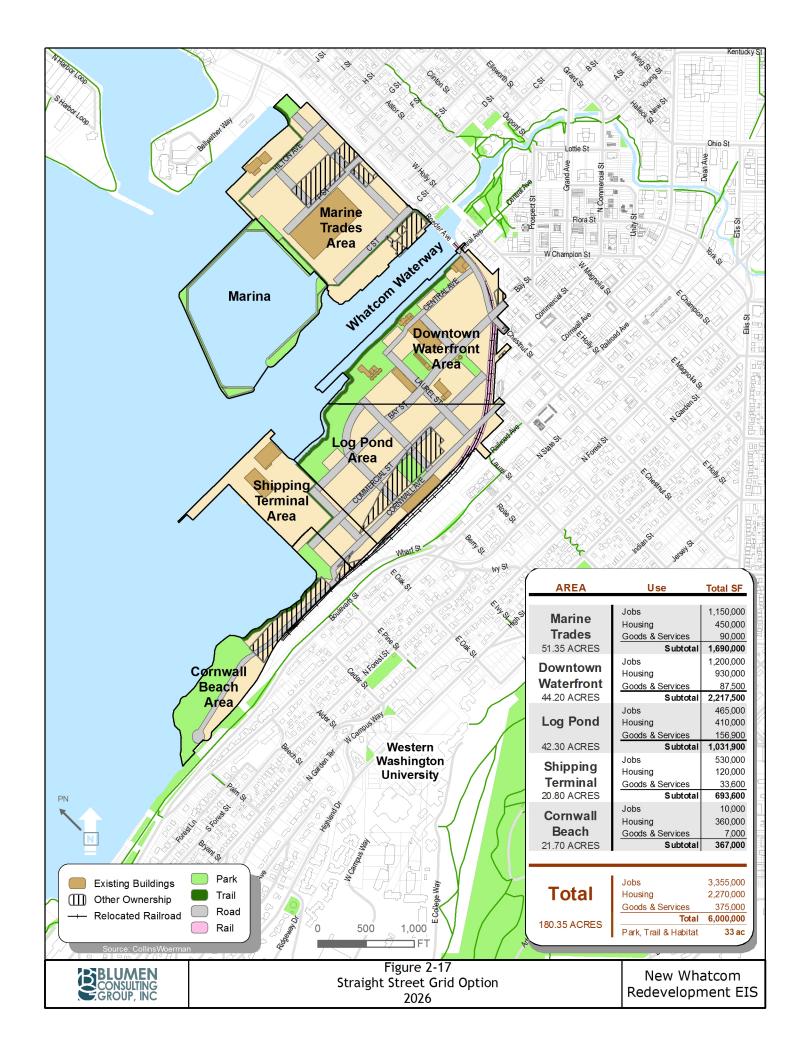
As mentioned previously, the City of Bellingham has requested that a rectilinear road grid option be analyzed in this SDEIS. This option, known as the "Straight Street Grid Option", is assumed to include a mix of land uses, density and parks, trails and open space, similar to those described under the Preferred Alternative (i.e. 6 million square feet of building space and 33 acres of parks, trails and habitat areas by 2026; see **Figures 2-16** and **2-17** for conceptual redevelopment plans under this Option by 2016 and 2026, respectively). The proposed roadway network and configuration under the Straight Street Grid Option would be similar to the rectilinear road grid included under Alternatives 1 - 3 in the DEIS. (See **Table 2-3** for a comparison of the assumptions under the Straight Street Grid Option to those under the DEIS Alternatives and the Preferred Alternative.)

The key differences between the Straight Street Grid Option, as defined by the City, and the Preferred Alternative would include: the orientation of the street grid and its connection to downtown and adjacent areas; assumed building heights; the assumed retention of certain historic buildings/structures; and, the assumption of view corridors along road rights-of-way. Below are further descriptions of these differences. Most of the other features of the Straight Street Grid Option are assumed to be similar to the Preferred Alternative, (i.e. stormwater system, grading concept) except as noted. Specific provisions for onsite parking have not been defined by the City for this Option.

2.4.1 Roadway System

Similar to DEIS Alternatives 1 - 3, the Straight Street Grid Option would feature a rectilinear roadway system that is intended to serve as an extension of the existing downtown grid. However, there would be no 5-legged intersection at Laurel St./ Commercial St./Log Pond Rd. onsite under this Option. In addition, a bridge connection across the railroad tracks would not be provided at Commercial St., as assumed under DEIS Alternatives 1 and 2 and the Preferred Alternative. A reconstructed bridge would be provided at Cornwall Ave. over the relocated railroad corridor. Also, a roundabout (or traffic signal) would be constructed at the Wharf St./ State St. intersection under this Option, as is assumed for Preferred Alternative.





The following is a list of the key roadway connections to the City street network under the Straight Street Grid Option.

- For the Marine Trades Area, F St. would be the primary site access corridor, service street and truck route. Access to the Marine Trades Area via extension of C St. and Hilton Ave. would also be provided.
- For the redevelopment areas south of the Whatcom Waterway, there would be three primary access point connections between the site and the existing roadway network (as well as an improvement at Wharf St.), including:
 - Improvements to Central Ave.
 - Re-constructed bridge connection at **Cornwall Ave.**
 - Reconstruct the bridge connection at Bay St.
 - **Wharf St.** roundabout at the N. State St./N. Forest St. intersection (or traffic signal)

Table 2-5 summarizes the road improvement assumptions for the Straight Street Grid Option for years 2016 and 2026. **Figure 2-18** provides a conceptual illustration of the road system under this Option for years 2016 and 2026.

The capacity of the road network under the Straight Street Grid Option and its relationship to individual roadway improvements and levels of redevelopment are addressed in **Section 3.12**, Transportation and **Appendix M** to this SDEIS.

The roadway rights-of-way under this Option are assumed to range from 60 feet in width to 100 feet in width, as described under Alternatives 1 - 3 in DEIS Chapter 2, Section 2.8.1. No wider Green or Park Streets are assumed under this Option (as those proposed under the Preferred Alternative).

2.4.2 Building Heights

For purposes of analysis in this SDEIS, it is assumed that the all buildings on the New Whatcom site would be subject to a 75-foot building height limit, except within the shoreline jurisdiction area under this Option. Building modulation and/or upper-level building setback requirements could be included as Development Regulations, as was assumed for the Preferred Alternative. Within the shoreline, it is assumed that redevelopment and building heights would be in compliance with the proposed update to the SMP.

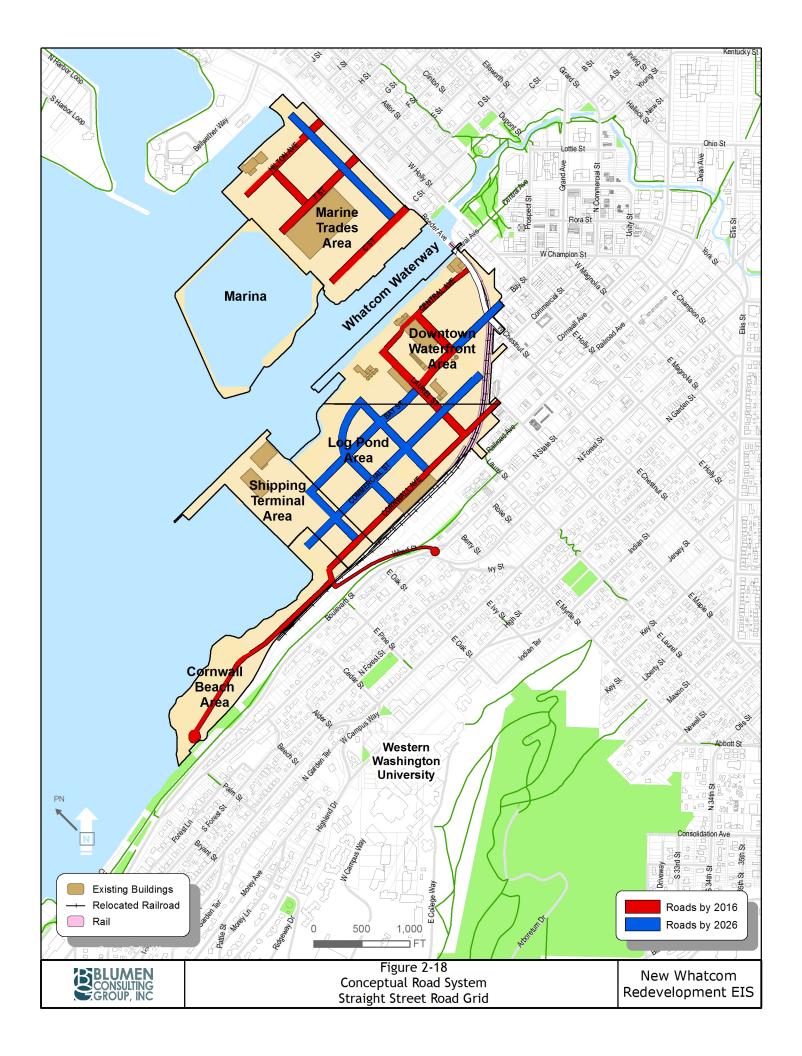


Table 2-5 **ROADWAY IMPROVEMENT ASSUMPTIONS – STRAIGHT STREET GRID OPTION**

Road Improvements by 2016	Road Improvements by 2026
North of Whatcom Waterway (Marine Trades Area)	North of Whatcom Waterway (Marine Trades Area)
 At grade improvements of Hilton Ave., F St. & C St. Develop Maple St. connector¹ 	 Same as 2016 Develop Chestnut St. connector¹
Install signal, upgrade C St. and develop at grade railroad crossing at C St./Roeder Ave./Holly St.	
South of Whatcom Waterway	South of Whatcom Waterway
 At grade improvements to Central Ave. & extend to Laurel St. Install traffic signal at Central Ave./Roeder Ave. intersection. 	 Reconstruct Bay St. bridge At grade improvements to Maple St. at Cornwall Ave., State St. and Forest St., including traffic control.
 Retain Commercial St. and Chestnut St. as is. At grade improvements to Laurel St. from Cornwall Ave. to Central Ave. 	Develop Oak St. from Cornwall Ave. to Bay St. and other internal streets south of Laurel St.
Re-construct Cornwall Ave. bridge	
Extend Cornwall Ave. south of Oak St. to Cornwall Beach area	
Relocate railroad	
Install Wharf St./State St. roundabout or traffic signal	

2.4.3 Historic Buildings

The Straight Street Grid Option assumes that 13 existing buildings/structures of 40 years of age or older would be retained/reused with redevelopment of the site. Below is a list of these buildings and structures, followed by the Port's assigned number for the building and an indication of "eligible", if it was concluded in the DEIS that it is potentially eligible for NRHP, WHR or BLLR listing (see Section 3.11, Historic and Cultural Resources of this SDEIS for the locations of these buildings and Appendix L to the DEIS for further descriptions of the buildings).

Source: Collins Woerman, 2008.

1 Roads do not connect to Maple St. and Chestnut St. offsite.

Again, the State Department of Archaeology and Historic Preservation would provide the formal opinion as to the potential eligibility and listing status of onsite resources.

Five of the buildings assumed to be retained under the Straight Street Grid Option are those that were assumed to be retained/reused with redevelopment under both the DEIS Alternatives 1-3 and the Preferred Alternative (buildings 3, 4, 8, 9b and 10). An additional five of the buildings assumed to be retained under the Straight Street Grid Option are buildings that could potentially be retained/reused under the Preferred Alternative, as identified earlier in this Chapter (buildings 7, 8, 12, 13 and 49). The remaining three buildings that are assumed to be retained under the Straight Street Grid Option are buildings 6, 17 and 37. As under the Preferred Alternative, additional analysis would determine the viability of reuse/relocation, with consideration of structural, economic, environmental and locational factors.

- Office, Bellingham Builders Supply Company (3, eligible)
- Kodiak Fish Co. Building (4)
- Shipping Terminal Pier (no Port #, number 8 in the Historic Property Resources report – Appendix L to the DEIS)
- Building J/Storage Unit (9B)
- Vitamins Inc. Building (10)
- Old Granary (7, eligible)
- Barking/Chipping Plant (8, eligible)
- Boardmill (12, eligible)
- Digester (13, eligible)
- High Density Tanks (49, eligible)
- Steam Plant (6)
- Alcohol Plant (17, eligible)
- Pulp Storage (37, eligible)

It should be noted that the Steam Plant (building 6) assumed to be retained under the Straight Street Grid Option is part of the GP Demolition Plan. The DEIS indicated that GP plans to demolish this building, consistent with the Demolition Plan included as part of the Port/GP Purchase and Sale Agreement (see Section 2.5.2 of Chapter 2 of the DEIS). Also, the Pulp Storage (building 37) assumed to be retained under the Straight Street Grid Option is one of the three buildings which the Port has identified for demolition in the near term, as discussed above.

2.4.4 View Corridors

The Straight Street Grid Option presents opportunities for views toward Bellingham Bay, Whatcom Waterway and/or the waterfront from the site, the CBD, Old Town and the Lettered Streets areas, similar to under DEIS Alternatives 1 - 3. The primary views toward the Bay/Waterway and beyond under this Option would occur along the onsite roadway rights-of-way, intended to serve as a continuation of the existing rectilinear grid in the downtown area. This includes views along Bay St., Commercial St., Cornwall Ave., Laurel St., Maple St., and through the Marine Trades Area.

The roadway rights-of-way under this Option are assumed to range from 60 feet in width to 100 feet in width, as described under Alternatives 1 - 3 in DEIS Chapter 2, Section 2.8.1. Wider, more open Green or Park Streets are not assumed under this Option (as proposed under the Preferred Alternative).

As mentioned earlier, the maximum building height limits under this Option are all assumed to be 75 feet, except in the shoreline area. Upper level setbacks or building modulations could, however, be required to enhance view opportunities.

See **Section 3.10**, Aesthetics/Light and Glare in this SDEIS for further discussion of the view corridors and visual impacts under the Straight Street Grid Option.