

3.11 HISTORIC AND CULTURAL RESOURCES

The following section compares the probable significant impacts from the Preferred Alternative and the Straight Street Grid Option on historic and cultural resources to those analyzed under the Redevelopment Alternatives (Alternatives 1 - 3) in the *2008 New Whatcom Redevelopment Project Draft EIS* (DEIS) and identifies any new or increased significant impacts and/or mitigation.

3.11.1 Affected Environment

The Draft EIS describes the general site history of the New Whatcom site and site vicinity dating back to pre-history occupation by the Lummi Nation and Nooksack Indian Tribe, and identifies existing historic resources and potential archaeologically significant areas on the site and within the site vicinity (only those buildings assumed to remain on the site subsequent to completion of Georgia Pacific (GP) demolition plans are considered as “existing” buildings/structures). Twenty-two buildings/structures on the New Whatcom site were identified to be 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); the DEIS concludes that 13 of these 22 buildings/structures could be potentially eligible for local, state or national historic registers. None of these buildings/structures are currently listed on any historic registers. The State Department of Archaeology and Historic Preservation would provide the final opinion as to the potential eligibility and listing status of onsite resources.

Subsequent to its closure of operations in 2007, GP has continued with its demolition program on the site. However, the existing status of historic and cultural resources reported in the DEIS has not changed (those assumed to remain after GP demolition activities still represent the “existing condition”); therefore, no changes to the discussion of existing conditions is warranted in this SDEIS.

3.11.2 Impacts

Draft EIS (Alternatives 1 - 4)

As the DEIS describes, construction of the New Whatcom Redevelopment Project could result in potential impacts to historic and cultural resources located on the site and in the site vicinity. Of the 36 existing buildings that remain on the site, the historic property survey prepared for the DEIS identifies 22 buildings and structures that are at least 40 years of age. For analysis purposes, the DEIS assumes that 17 of the 22 existing buildings and structures at least 40 years of age could potentially be removed as part of redevelopment, leaving 5 buildings assumed to be retained with redevelopment under Alternatives 1 – 3. The 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 the DEIS concludes 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).

The 5 buildings/structures assumed to be retained in the DEIS (at least 40 years of age) are:

- Office, Bellingham Builders Supply Company (#3, eligible);
- Kodiak Fish Company Building (#4);
- The Shipping Terminal Pier (no Port #, #8 in the DEIS Historic Property Resources Report);
- Building J/Storage Unit (#9B); and,
- Vitamins Inc. Building (#10).

In the DEIS, 12 of the 17 buildings/structures that could be removed are identified as potentially eligible resources. However, it is possible that some of these buildings could be retained for adaptive reuse/rehabilitation which would result in no direct impact to the resource. The DEIS indicates that final decisions on the removal or retention/reuse of buildings/structures would be made by the Port and City in the future.

During construction, listed historic resources in the vicinity of the site could potentially experience indirect impacts from construction-related activities; with implementation of construction mitigation, significant impacts to offsite resources would not be anticipated. Below grade construction, utility installation and/or removal of existing waterfront features and relocation of the railroad corridor could create the potential to expose or disturb Native American and archaeological materials. To the extent that any below grade work is required, such work could adversely affect potential archaeological materials located within the New Whatcom site area.

No direct impacts to listed historic resources in the site vicinity would be anticipated as a result of the operation of redevelopment under Alternatives 1 – 3. Increased levels of air pollution, noise, and vibration could occur in the vicinity of offsite historic resources; however, these levels are not anticipated to be significant. New buildings on the New Whatcom site could alter existing views from offsite historic resources; a majority of these views are currently affected by existing buildings. The historic value of these resources is not dependent upon views to and beyond the New Whatcom site. Therefore, alteration of existing views, if any, would not be anticipated to reduce the historic value of these resources.

The No Action Alternative assumes the retention of all existing buildings/structures (buildings/structures remaining after GP demolition) and as a result, no direct impacts to potential historically-eligible buildings/structures would occur. Archaeological resources could be impacted due to excavation for infrastructure and building redevelopment. Similar to Alternatives 1 - 3, operation under the No Action Alternatives could result in indirect impacts from noise, air pollution, and traffic. Redevelopment could also affect views from offsite historic resources. These impacts are not anticipated to be significant, however.

Preferred Alternative

Levels of redevelopment under the Preferred Alternative would be within the range of redevelopment assumed for DEIS Alternatives 1 – 3. Proposed redevelopment under the Preferred Alternative would include similar density levels and land uses to those analyzed under DEIS Alternative 2. Therefore, in general, it is anticipated that potential impacts to historic and archaeological resources from construction and operation on the New Whatcom site would be similar to those described under DEIS Alternative 2 (see DEIS Section 3.11.2 for details on these anticipated impacts).

While the overall historic and archaeological impact potential from redevelopment under the Preferred Alternative would be similar to DEIS Alternative 2, the Preferred Alternative identifies five potentially eligible historic resource buildings (in addition to the five buildings previously identified in the DEIS), which could have a potential for retention or reuse on the site in some capacity, thereby reducing or avoiding potential direct impacts to these buildings (see **Figure 3.11-1**).

Potential reuse or retention opportunities for all or some of these structures could include: the retention of the existing structure and reuse in its current configuration; reuse of the building's original materials; and/or, relocation and preservation of industrial equipment or features. For example, preservation of the Board Mill Building or Digester Building could include the reuse of building materials at a different onsite building location, or the relocation and reuse of industrial equipment contained in these buildings (if decisions are made in the future to actually retain or reuse these particular buildings within their present locations, an adjustment in the proposed road network would be required).

The five additional historic structures that could be retained/reused under the Preferred Alternative are:

- Old Granary Building (#7, eligible)¹;
- Barking and Chipping Plant (#8, eligible);
- Ceramic Tanks (#49, eligible).
- Board Mill Building (#12, eligible); and,
- Digester Building (#13, eligible).

Additional analysis would determine the level of reuse potential for each structure based on structural integrity, necessary seismic upgrades, building footprint sizes, economic considerations, view corridors, potential sea level rise impacts and proposed street grid location and grade. Final decisions on the specific removal or potential reuse of buildings and structures would be made in the future by the Port and City.

Since issuance of the DEIS, the Port has also identified three structures (that are at least 40 years of age and potentially eligible) for potential demolition in the near term subject to applicable permits (see **Figure 3.11-1**). A Mitigated Determination of Non-Significance was issued by the Port on October 1, 2008 related to the demolition of these structures. These structures include the following:

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

Demolition of these three buildings is intended to occur in conjunction with near-term GP demolition activities. Mitigation measures identified as part of the demolition would include documentation of the buildings, as well as the development of a salvage/reuse plan and interpretation plan for each of the three buildings.

¹ If this building is ultimately retained under the Preferred Alternative, site access from Central Ave. to Roeder Ave. could be moved to the south.

Impacts to offsite historic resources under both construction and operation of the Preferred Alternative would be similar to those discussed for DEIS Alternatives 1 - 3. Construction impacts would occur incrementally and would not be expected to be significant. Alteration of views from offsite historic resources could occur. However, a majority of these views from historic resources toward the site and Bellingham Bay are currently affected by existing buildings and structures. Any alteration would not be anticipated to reduce the historic value of these resources, and no significant impacts would result.

Similar to DEIS Alternatives 1 - 3, the Preferred Alternative could result in below grade excavation for buildings and/or utilities, as well as removal of waterfront features and relocation of the railroad corridor to the bluff. These construction activities could result in potential impacts to pre-contact or ethnohistoric Native American resources. With implementation of mitigation measures, significant impacts would not be expected.

Straight Street Grid Option

Under the Straight Street Grid Option, potential impacts to historic and archaeological resources would be similar to or less than those described under the Preferred Alternative and DEIS Alternatives 1 - 3. Under the Straight Street Grid Option the retention of a total of 13 buildings/structures on the site that are at least 40 years of age (8 of which could potentially be eligible for listing in the NRHP, the WHR, and/or the BLLR) is assumed (see **Figure 3.11-2**). These structures include the 5 structures identified in the DEIS, the additional 5 structures identified under the Preferred Alternative, as well as the following 3 structures:

- Steam Plant (#6);
- Alcohol Plant (#17, eligible); and,
- Pulp Storage Building (#37, eligible).

Although it is identified for retention under the Straight Street Grid Option, the Pulp Storage Building has been identified by the Port as a building that is intended to be demolished in the near-term subject to applicable permits. In addition, it should be noted that the Steam Plant is identified in the GP Demolition Program that was included as part of the Port/GP Purchase and Sale Agreement; therefore, this building is assumed to be removed as part of the GP Demolition Program, as described in the DEIS and under the Preferred Alternative (see Section 2.5.2 of Chapter 2 of the DEIS for more details).

If all 13 building/structures are ultimately retained as part of the Straight Street Grid Option, direct impacts to certain historic resources would be less as compared to the Preferred Alternative. Additional analysis would determine the level of reuse potential for each structure based on structural integrity, necessary seismic upgrades, building footprint sizes, economic considerations, view corridors, potential sea level rise impacts, and proposed street grid location and grade. Final decisions on the specific removal or potential reuse of buildings and structures would be made in the future by the Port and City. All other potential historic and archaeological impacts would be the same as under the Preferred Alternative.



Figure 3.11-2
Potential Eligible Historic Resources to be Retained / Reused
Straight Street Road Grid

3.11.3 Conclusions

The potential for significant impacts of the Preferred Alternative on historic and archaeological resources would be within the range of impacts analyzed under the DEIS Alternatives. Historic and archaeological impacts would be similar to or less than those described under DEIS Alternative 2. No additional significant impacts to historic or archaeological resources would be anticipated with the Preferred Alternative. The Preferred Alternative identifies 10 historic structures that are over 40 years of age (5 structures from the DEIS and 5 additional structures under the Preferred Alternative) that could be retained or reused in some capacity; therefore, the potential for impacts to historic resources could be somewhat reduced as compared to DEIS Alternatives 1 - 3.

The potential for significant impacts of the Straight Street Grid Option would be similar to, or less than those described under the Preferred Alternative, due to the assumed retention of a total of 13 historic structures.

3.11.4 Mitigation Measures

Mitigation measures to address the potential for significant historic and archaeological impacts of Alternatives 1 – 3 are identified in the DEIS. These mitigation measures would also apply to the Preferred Alternative and the Straight Street Grid Option and include the following:

- The Port would explore opportunities for adaptive reuse of existing onsite industrial buildings with consideration of structural, economic, market, and land use factors.
- Historic American Building Survey (HABS) and Historic American Engineering Record (HAER) documentation for potentially eligible buildings and structures onsite that are scheduled for demolition could be prepared during the future permit process.
- An interpretation plan for the Whatcom Waterway area and potentially eligible buildings and structures onsite that are scheduled for demolition or major modifications could be formulated during the future permit process.
- Building materials salvage and reuse strategies could be developed for potentially eligible buildings and structures onsite that are scheduled for removal and demolition. Salvaged materials could include heavy timbers, brick, steel, and stone from onsite structures.
- The terra cotta clad high pressure tanks, located on the site and associated with the former mill operation could be retained (either onsite or at another location). In addition, the high pressure globe and steel log remover could also be retained as a representation of the historically industrial use of the site.
- Any planned onsite construction in the immediate vicinity of National Register of Historic Places (NRHP), Washington Heritage Register (WHR), and Bellingham Local Landmarks Register (BLLR) listed buildings and structures could be monitored so that such listed resources would not be adversely affected by ground settlement, vibration or other geotechnical factors.

- A management plan could be developed by the Port for the construction life of the New Whatcom redevelopment, drafted in consultation with and agreed upon by applicable state, tribal, and local agencies. The management plan could:
 - Establish procedures and appropriate responses for addressing potential effects to archaeological resources, including review by a qualified archaeologist of specific construction components (review could be limited to construction components in or adjacent to high probability areas);
 - Consider levels of contractor awareness training and specific areas where onsite archaeological monitoring during construction could be conducted;
 - List onsite chains of authorities and contacts for decision-making regarding inadvertent archaeological discoveries during construction activities;
 - Describe prescriptive actions that would result in minimal additional disturbances to potentially significant resources if any are discovered, including specific treatment plans for inadvertent discovery of human remains; and,
 - Identify expectations of participating groups involved in addressing the site's potential discovery of archaeological resources.

The following additional mitigation measure is identified to address potential historic and archaeological impacts:

- A Programmatic Agreement between the Port, the Washington State Department of Archaeology and Historic Preservation (DAHP), and the City could be developed to ensure compliance over the project's buildout period with identified mitigation measures.

3.11.5 Significant Unavoidable Adverse Impacts

With the implementation of the mitigation measures identified above, including those identified in the DEIS, no significant adverse impacts to historic and archaeological resources would be anticipated to result from redevelopment under the Preferred Alternative or the Straight Street Grid Option.