CHAPTER 2

Key Topic Areas

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Consistent with SEPA requirements, a public comment period was provided for the January 2008 Draft EIS (DEIS)[1], the October 2008 Supplemental Draft EIS (SDEIS) and the February 2010 EIS Addendum (EIS Addendum). During the public comment periods for these three documents at total of 88 comment letters were received and public testimony was provided by 24 individuals. All of the comments received, as well as responses to the comments, are provided in **Chapter 3** of this FEIS.

A number of comments (written and verbal) were received that identified common subjects; these have been termed "key topic areas." Rather than providing a similar response to each comment that shares a common theme, this chapter of the FEIS identifies the key topic areas and provides a detailed discussion for each Key Topic area. Responses to specific comments in **Chapter 3** of this FEIS which pertain to these topics areas refer back to the discussion that is contained in this section.

The following key issues are discussed in this chapter of the FEIS:

2-1 Historic Resources

Introduction

The relationship between proposed redevelopment and historic resources on The Waterfront District site has been analyzed in detail in the SEPA environmental review documents published to date (DEIS, SDEIS and EIS Addendum). The analyses presented in these previous environmental review documents has consistently assumed that many of the structures associated with prior Georgia Pacific (GP) operations were potentially eligible for listing on local, state or national registers, and conservatively assumed that the majority of the potentially eligible structures could be removed to accommodate site redevelopment; thus, providing a conservative worst-case scenario for SEPA analysis purposes. However, the ability to retain/reuse certain existing eligible structures is not precluded. Provisions to commemorate the maritime industrial history of the site, reduce the potential impacts to historic structures and retain the potential for retention/reuse of historic structures have been identified throughout the SEPA process.

[1] At the request of the public, the Port extended the comment period for the January 2008 Draft EIS from the required 30 days to 60 days.

Summary of Environmental Analysis

Assumptions Regarding Historic Building/Structures

A detailed description of the development history of The Waterfront District site and surrounding area was provided in the DEIS. The DEIS indicated that 22 buildings/structures on The Waterfront District site are at least 40 years of age and that 13 of these buildings/structures could be eligible for listing on local, state or national registers. The DEIS recognized that the State Department of Archaeology and Historic Preservation (DAHP) provides the final opinion as to the potential eligibility and listing status of on-site resources (primarily related to the piers and the brick-clad buildings associated with the Georgia Pacific mill).

To provide a reasonable upper level determination of potential impacts for SEPA analysis purposes, the DEIS assumed that 12 of the 13 buildings/structures identified as potentially eligible would be removed from the site to accommodate redevelopment and the removal of these structures from the site was identified as an environmental impact (page 3.11-8 of the DEIS); the DEIS assumed the on-site pier associated with the Shipping Terminal as the only potentially eligible structure to be retained. However, the DEIS also indicated that some of the potentially eligible structures could be retained for adaptive reuse/rehabilitation, with the final decisions on removal or retention/reuse to be made by the Port and City in the future[2]. The DEIS also identified mitigation measures to reduce the impact to potentially eligible historic resources, including:

- 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 Waterfront District 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 buildings.

- 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

[2] It should be noted that the Steam Plant is owned by Georgia Pacific and any decisions regarding the economic value of this structure, including salvage, would be made by Georgia Pacific.

resources would not be adversely affected by ground settlement, vibration or other geotechnical factors.

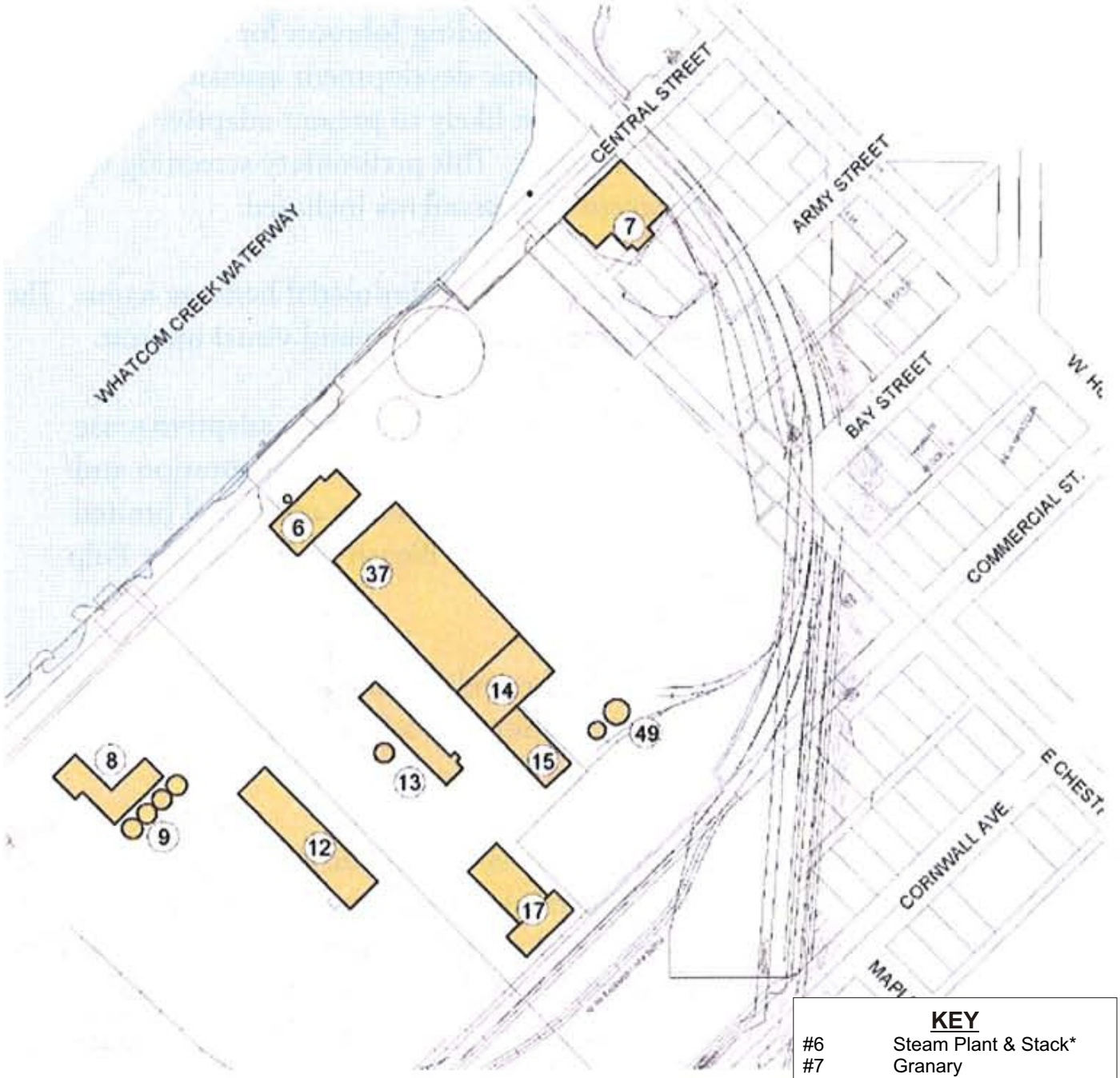
The DEIS indicated that with implementation of the mitigation measures, significant unavoidable adverse impacts to historic structures would not be anticipated.

The SDEIS indicated that proposed redevelopment under the Preferred Alternative could result in similar environmental impacts to potentially eligible historic structures as identified in the DEIS. However, the SDEIS specifically identified five structures that could be retained/reused under the Preferred Alternative, including: Old Granary Building (7), Barking and Chipping Plant (8), Ceramic Tanks (49), Board Mill Building (12), and Digester Building (13). The SDEIS indicated that additional analysis would determine the level of reuse potential for each structure based on necessary seismic upgrades, structural integrity, building footprint sizes, and economic considerations.

In support of the EIS Addendum, the *2010 Waterfront District Adaptive Reuse Assessment*, examined the potential for retention/reuse of 11 existing on-site structures in regards to historic resource value, cost of reconstruction, market feasibility and compatibility with other planning objectives for The Waterfront District. The 11 on-site structures assessed for the EIS Addendum include: Steam Plant[3] (6) – not including the stack that has been identified as a potential safety concern *(*see Appendix A to the EIS Addendum – 2010 Waterfront District Adaptive Re-Use Assessment, page 59*)*; Old Granary Building (7); Barking and Chipping Plant (8); Chip Bins (9); Board Mill Building (12); Digester Building (13); Pulp Screen Room (14); Beach Plant (15); Alcohol Plant (17); Pulp Storage Building (37); and, the High Density Ceramic Tanks (49). Refer to **Figure 2-1** for a map of the location of each of the 11 on-site structures evaluated in the *2010 Waterfront District Adaptive Reuse Assessment* in the EIS Addendum.

Based on the structural, architectural and economic evaluations conducted as part of the *2010 Waterfront District Adaptive Reuse Assessment* it was determined that none of the structures evaluated would be financially viable for reuse in the current economic climate. Because the current economic climate is affected by a significant and broad recession, the financial viability for reuse of the structures was also evaluated under a set of assumptions defined by a reasonably improved economy within approximately five years. Even under improved economic conditions and with the use of historic tax credits, none of the structures were determined to be financially viable for adaptive reuse. Despite these conclusions, four (4) structures were identified as having sufficient potential for retention or reuse that they should be retained for some period of time to allow reconsideration prior to demolition, to determine if site conditions or economic considerations allow for retention or reuse. In addition, three (3) structures were identified as potential icons reflecting the industrial heritage of the area. Thus, based on their structural and architectural characteristics, the EIS Addendum indicated that the following structures were proposed to be temporarily held from demolition in the near term to allow the opportunity to further consider site cleanup and redevelopment activities, and market and economic conditions (page 3.4-4 of the EIS Addendum).

[3] The Steam Plant is owned by Georgia Pacific and any decisions regarding the economic value of this structure, including salvage, would be made by Georgia Pacific.



KEY

#6	Steam Plant & Stack*
#7	Granary
#8	Bark & Chip Plant
#9	Chip Bins
#12	Board Mill
#13	Digester Tanks
#14	Pulp Screen Room
#15	Bleach Plant
#17	Alcohol Plant (East & West)
#37	Pulp Storage
#49	High Density Tanks

* Owned by GP - GP plans to demolish this building due to structural safety concerns and contractual obligations

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Figure 2-1

Historic Structures Map

The EIS Addendum identified the Steam Plant (6) as a structure that is still owned by Georgia Pacific (GP). It also identified the Steam Plant stack as a part of the structure that presented potentially significant safety hazards. The foundation connecting the stack to the ground was determined to be inadequate under certain seismic and/or high wind conditions. The stack was also determined to include asbestos-containing materials that needed remediation.

Subsequent to the publication of the EIS Addendum, additional information has been made available regarding the Steam Plant. Georgia Pacific has identified significant economic and contractual obligations that the company has regarding the salvage value of steel and other materials within the structure itself. These obligations are current and make the near-term financial viability of adaptive reuse of the Steam Plant even more challenging than presented in the EIS Addendum. Accordingly, the provisions identified in the EIS Addendum have been modified with respect to the Steam Plant. Due to this information regarding market and economic conditions and GP's financial considerations and obligations, the Steam Plant may be demolished.

The following structures/portions of structures are proposed to be **temporarily held from demolition to allow for further consideration of possible retention/reuse, based on the phasing of site cleanup and redevelopment activities, any changes in market and economic conditions, and the financial considerations and obligations of the owner:**

- Old Granary Building (7) – owned by Port of Bellingham
- Board Mill Building (12) – owned by Port of Bellingham
- Alcohol Plant – East Portion (17) – owned by Port of Bellingham

The following iconic structures would be **temporarily held from demolition for possible retention/reuse in some manner in the future** (based on further icon evaluation and financial considerations of the owner at the time of redevelopment):

- Chip Bins (9) – owned by Port of Bellingham
- Digester Tanks (13) – owned by Port of Bellingham
- High Density Tanks (49) – owned by Port of Bellingham

As indicated above, the Port and City recognize the unique attributes of the existing GP structures, and how they reflect the site's maritime industrial heritage. However, based on extensive assessments, it was determined that the industrial nature of the structures can substantially limit the economic viability of reuse, as compared to older buildings designed for hotel, residential or office use. Through the SEPA process, the Port has identified various ways to commemorate the maritime industrial history of the site and to retain the potential for reuse of certain buildings depending upon actual economic and market conditions in the future.

Washington State DAHP Determination on Eligibility

As part of the *2010 Waterfront District Adaptive Reuse Assessment* effort, the Port submitted background documentation on the 11 on-site structures being analyzed to the DAHP to request preliminary findings of eligibility (or lack thereof) as National Register of Historic Places (NRHP) resources (refer to Figure 2-1 for a map of the 11 structures). In January 2010, DAHP determined that 10 of the 11 structures[4] are eligible for listing on the NRHP and are properties that could contribute to a historic district (*see Appendix A* of the EIS Addendum). Nine of these

[4] The only structure determined not eligible for listing as part of an historic district was the Old Granary Building 7 (referred to as the WA Egg & Poultry Building in the DAHP letter).

structures were also determined to be individually eligible for listing. This DAHP determination is consistent with the DEIS assumption that the structures could be potentially eligible for listing and the DAHP determination does not substantially change the impact identified in the DEIS and SDEIS.

However, the *2010 Waterfront District Adaptive Reuse Assessment* concluded that none of the 11 structures analyzed would be financially viable for reuse based on current economic conditions and potentially improved economic conditions over the near-term (an approximately 5 year period was assumed). The fundamental reason for this conclusion is that the on-site structures were constructed to house industrial equipment and operations; therefore, the structures do not contain floors or utilities (plumbing, heating, etc) typically contained in older buildings that have been successfully reused in other areas. This condition has a profound effect on the economic viability of future reuse of these structures for other uses (residential, office or commercial uses). As previously identified in the DEIS and the SDEIS, the EIS Addendum also indicated that removal of the eligible structures from the site would result in an environmental impact under SEPA.

As indicated in Appendix A2 to the EIS Addendum, it is acknowledged that the Georgia Pacific structures form a potentially eligible district. However, if several of the core buildings (i.e. Bleach Plant and Steam Room) were demolished as deemed necessary due to the structural and economic constraints (see Appendix A to the EIS Addendum), a collection of fewer than the extant buildings would substantially weaken the attributes of a cohesive district. The analysis of the economic viability of adaptive reuse for the Georgia Pacific structures (see Appendix A to the EIS Addendum) indicated that even with the use of historic tax credits, reuse of the Georgia Pacific structures is not economically viable at this time.

EIS Alternatives

WAC 197-11-440(5) (Washington State SEPA Rules) indicates that "*reasonable alternatives shall include actions that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation*." As described in Chapter 2 of the DEIS, the Port's objectives for site redevelopment are based on the past and ongoing master planning process and analysis of site conditions, environmental constraints, and economic and market conditions (pages 2-17 and 2-18 of the DEIS). The objectives listed in Chapter 2 of the DEIS include: redevelop the industrial site into a mixed use waterfront neighborhood; provide community benefits through the phased construction of public spaces; enhance the region's economic vitality by creating conditions that are attractive to a range of employment opportunities and businesses; construct an integrated and economically responsible infrastructure network; increase public access to the waterfront; and, provide a mix of housing product, including affordable housing.

Consistent with the Port's objectives, the DEIS analyzed three redevelopment alternatives reflecting a range of mixed uses from 7.5 million square feet of mixed use redevelopment (Alternative 1), to 4 million square feet of mixed use redevelopment (Alternative 3). Redevelopment Alternatives 1 through 3 assume the removal of existing potentially eligible buildings on the site to provide a conservative worst-case SEPA analysis; however, the ability to retain/reuse certain existing eligible structures in the future is not precluded. The Preferred Alternative under the SDEIS and the Updated Preferred Alternative under the EIS Addendum call for 6 million square feet of mixed use redevelopment and assume the removal of the eligible structures. Likewise, the ability to retain/reuse certain eligible structures would not be

precluded. For example, a temporary hold on demolition of seven eligible structures on the site pending further consideration regarding potential reuse is suggested in the EIS Addendum. Implementation of such proposed provisions, particularly the retention of certain structures of iconic value, could reduce the impacts of removal of eligible structures on the site.

In addition, the DEIS analyzed an alternative that reflects conditions that would likely occur if mixed use redevelopment consistent with the Port's objectives did not occur (Alternative 4 – No Action). Alternative 4 assumes up to 2 million square feet of industrial uses consistent with existing zoning. Alternative 4 assumes potential retention of existing eligible structures on the site, consistent with the industrial nature of such uses. However, even under Alternative 4, certain structures may not be able to be retained as they have not been maintained and do not meet current codes.

Thus, the SEPA analyses conducted for the Waterfront District (including the DEIS, SDEIS and EIS Addendum) have addressed a wide range of redevelopment alternatives including an alternative assuming retention of existing structures (Alternative 4) and alternatives assuming a reasonable upper level determination of potential impacts where all buildings would be demolished (DEIS Alternatives 1 through 3 and the EIS Addendum Updated Preferred Alternative). However, DEIS Alternatives 1 through 3 and the EIS Addendum Updated Preferred Alternative do not preclude the retention of any structure.

Summary of Responses to Comments

Several comments were received on the DEIS, SDEIS and EIS Addendum related to historic resources. The primary comments/questions are summarized below, followed by brief responses (see **Chapter 3** of this FEIS for the complete comments and responses).

Why does the EIS assume the removal of the majority of the eligible[5] structures on the site?

- The analyses on historic resources presented in the DEIS, SDEIS and EIS Addendum assume that the majority of the eligible structures would be removed from the site to provide a reasonable upper level determination of potential impacts for SEPA analysis purposes. However, the analyses indicate that some of the potentially eligible structures could be retained temporarily for further consideration of adaptive reuse/rehabilitation, with the final decisions on removal or retention/reuse to be made by the Port and City in the future based on site cleanup and redevelopment activities, changing market and economic conditions and the financial considerations and obligations of the owner of the structure. Georgia Pacific, for example, is the owner of the Steam Plant and will make the decision regarding the removal or retention/reuse of that structure.

Does the EIS identify the removal of eligible[5] structures from the site as an environmental impact?

- Yes, the DEIS, SDEIS and EIS Addendum identify the removal of the eligible structures from the site as an environmental impact.

[5] The term "eligible" refers to structures potentially eligible for listing on national, state, or local historic registers.

Are mitigation measures identified to provide the potential for adaptive reuse of eligible[5] structures?

- Yes, the DEIS, SDEIS and EIS Addendum include measures to increase the potential for adaptive reuse of on-site eligible structures and to commemorate the maritime industrial history of the site.

How does the January 7, 2010 letter from the Washington State Department of Archaeology and Historic Preservation (DAHP) on the eligibility of on-site structures for listing on the National Register relate to the analyses on historic resources presented in the DEIS, SDEIS and EIS Addendum?

- The determination of eligibility by the DAHP confirms the assumptions regarding the eligibility of on-site structures included in the DEIS, SDEIS and EIS Addendum and represents new information that was anticipated and therefore does not change the impacts identified in the environmental analyses.

Does the collection of structures on the site comprise an historic district?

- The existing Georgia Pacific (GP) structures form a potentially eligible district. However, if several of the core GP structures (i.e. Beach Plant and Steam Room) were demolished as deemed necessary due to structural and economic constraints, a collection of fewer than the extant structures would substantially weaken the attributes of a cohesive district.

Why doesn't the EIS analyze an alternative reflecting mixed use redevelopment with retention of the eligible[5] structures?

- The SEPA analyses conducted for the Waterfront District (including the DEIS, SDEIS and EIS Addendum) have addressed a wide range of redevelopment alternatives including an alternative assuming retention of existing structures (Alternative 4) and alternatives assuming a reasonable upper level determination of potential impacts where all buildings would be demolished (DEIS Alternatives 1 through 3 and the EIS Addendum Updated Preferred Alternative). However, DEIS Alternatives 1 through 3 and the EIS Addendum Updated Preferred Alternative do not preclude the retention of any structure.

2-2 Transportation/Parking

Introduction

The relationship between redevelopment on The Waterfront District site to the on-site and off-site transportation system was evaluated in detail in the SEPA environmental review documents published to date, including the DEIS, SDEIS and EIS Addendum. The analysis relied on available transportation data and the latest industry standards and methodologies to present a reasonable upper level of determination of potential impacts for SEPA analysis purposes. However, mitigation measures to reduce the potential transportation impacts, including decreasing reliance on single-occupant auto travel, reducing the need for on-site parking, and phasing of street and other capital improvements were also identified throughout the SEPA process.

Through the EIS process, a range of redevelopment alternatives were evaluated that would provide a vision of The Waterfront District. The transportation system framework for the site was analyzed throughout the process and mitigation strategies for the transportation system were identified for The Waterfront District. The mitigation strategies related to non-auto mode share are aggressive and would require substantial upgrades to the existing pedestrian, bicycle, and transit facilities as they are higher than what is being achieved in Bellingham today. However, the transportation analysis for the DEIS and SDEIS do not assume these non-auto mode upgrades in order to provide a reasonable upper level determination of potential transportation impacts under SEPA; although actual non-auto mode share may be more than that analyzed, the analysis provides a reasonable upper level determination of potential transportation impacts. The EIS Addendum also provides an evaluation that assumes a more aggressive non-auto mode share to understand the implications on the street, non-motorized, and transit systems. The MDP will continue to evolve after the EIS process is concluded and could incorporate recommendations and mitigation measures from the EIS, such as a transportation monitoring program (see Section 3.5.4 of the EIS Addendum for details on the program). Implementation of a monitoring program would allow for the efficient phasing of capital improvements as well as possible changes to identified infrastructure improvements to support actual mode shares being achieved in the future.

Roadway Infrastructure Phasing

The Waterfront District transportation network currently being planned by the Port and City is designed to accommodate the needs of automobiles, pedestrians, cyclists and transit. At full buildout, the network would integrate and reconnect the surrounding neighborhoods and provide the community with access to 33 acres of new waterfront parks, open space and trails. However, redevelopment is expected to occur over a relatively long timeframe in phases. Phased construction of the street network would focus development in specific areas so that a cohesive feeling for the Waterfront District is maintained over time as growth occurs.

The current infrastructure phasing strategy being developed by the Port and City is intended to reflect market conditions and budget constraints. Early phases are designed to activate the northern portion of the Downtown Waterfront Area, providing strong connections between downtown and the waterfront. In addition, public resources in these early phases would support development activity in the Marine Trades Area and the Cornwall Beach Area. The installation

of parks and trail connections would also occur in incremental phases, consistent with infrastructure. The combination of transportation and public access features in early phases would create strong physical and visual connections between downtown and the waterfront and establish signature parks and public access features along the south side of the Whatcom Waterway. During early development phases, it is expected that the Log Pond Area would continue to be used for light industrial activities.

As the Downtown Waterfront Area gradually develops into an urban village, additional infrastructure improvements would be phased in as necessary. Additional infrastructure would also be installed in the Marine Trades Area and the Cornwall Beach Area in later planning phases. As redevelopment occurs in those areas, the Log Pond Area would eventually be considered for a transition from light industrial to mixed use. In this later phase of redevelopment within the Waterfront District, streets, infrastructure and public parks would be installed to support this transition.

The EIS presents an analysis of the potential environmental impacts that may occur during the long term buildout of the Waterfront District, but is not intended to represent a specific sequence of construction and redevelopment. For example, Section 3.5.4 of the EIS Addendum presented one scenario of construction sequencing, mitigation and associated development capacity for infrastructure for the purposes of analysis, but actual buildout could occur in a different sequence. The analysis of impacts is designed to apply to any sequence of construction and development phasing. Installation of the proposed transportation network and public parks would be managed over time in response to development trends and opportunities, funding availability, community priorities, and the schedule for railroad relocation.

Summary of Environmental Analysis

Trip Generation

Estimating future traffic generation for The Waterfront District is the foundation of the transportation analysis and the basis of impacts identified. There is limited empirical trip generation data for local or regional sites similar to the proposed redevelopment; therefore, to substantiate the assumptions and ensure they are reasonable it is important to be consistent with City-recognized trip generation sources including the Institute of Transportation Engineers (ITE) and the City's Comprehensive Plan goals. The DEIS describes in detail the methodology used to estimate the trip generation for The Waterfront District (see page 3.12-26 to 3.12-27). ITE *Trip Generation* was only the starting point in estimating vehicular and other trips generated by the redevelopment. The transportation analysis analyzes a scenario with a reduced dependence on the automobile as compared to that observed in Bellingham today and is consistent with the City Comprehensive Plan mode share goals. Figure 14 of the DEIS, Appendix N illustrates the trip generation process followed for the EIS analysis, including:

- The ITE daily vehicle trip rates were converted to a daily person trip rate based on average vehicle occupancy from ITE *Trip Generation* and the City of Bellingham 2000 US Census journey to work data. These daily person trip rates were validated against the Whatcom County travel demand model and national data including similar redevelopments in San Francisco, California and Portland, Oregon.

- Using the size of the redevelopment and daily person trip rates, the total daily person trips were determined for each land use type.

- The daily person trips were broken down into auto, transit, and bicycle/walk/other trips for each type of land use assumed for The Waterfront District. Transit trips represented 2 to 6 percent of the daily person trips while bicycle/walk/other trips represented 5 to 20 percent of the daily person trips. These mode shares were based on the City of Bellingham's Comprehensive Plan goals.

- The result of the above step provided the overall number of person trips by auto, transit, and bicycle/walk/other modes. To determine the redevelopment vehicle trips, daily person auto trips was divided by the average vehicle occupancy, which was assumed to be approximately 1.3 persons per vehicle over the entire day but varied by land use type. This is higher than the 2000 US Census data journey to work data for Bellingham, which showed approximately 1.1 persons per vehicle during the commute period.

- Based on daily vehicle trips, both AM and PM peak hour vehicle trips were determined using the estimated proportion of daily trips that occur during the peak hours.

The EIS transportation analysis was not prepared using standardized professional practices for smaller suburban developments for vehicle trip and parking generation. Trip generation incorporated transit, bicycle, pedestrian, and other alternative modes based on available City and regional data, and used standard ITE practices as a starting point only. The methodology used for trip generation is similar to what the City of Seattle uses to conduct their SEPA analysis even though it recognizes that future mode shares for alternatives to automobile travel may be higher in the future.

Parking Impacts

The EIS analysis of parking demand evaluates a reasonable upper level of parking supply for the purposes of disclosing potential parking impacts; although the actual parking supply associated with redevelopment may be less than that analyzed, the analysis provides a reasonable upper level determination of potential parking impacts. It was intended to determine the impacts from redevelopment of The Waterfront District on the downtown Bellingham parking supply, and identify measures to reduce potential parking impacts since parking in the downtown core is a continual topic of discussion and concern by the community and property owners. The analysis assumes that parking would be provided in phases as redevelopment occurs. It is the intent of the Port to reduce parking supply ratios over time, as appropriate, and limit parking impacts on existing downtown businesses.

Land use type and density factor into the amount of parking supply needed for any development. The comparison of parking supply needs to other types of development must consider both of these components (e.g., shopping malls, universities, and downtown Bellingham have very different land use types and densities than The Waterfront District Redevelopment Project).

As part of the analysis, it is anticipated that The Waterfront District would provide approximately 12,892 parking spaces on-site, which would accommodate the hourly parking demand on The Waterfront District site. Given that the majority of on-site users would be able to park on-site, it is anticipated that impacts to off-site parking (including downtown) would be minimal.

The EIS Addendum discusses mitigation strategies that could be used to reduce the level of parking supply (see pages 3.5-16 to 3.5-20 of the EIS Addendum). These strategies include an increase in the non-auto modes to and from The Waterfront District, which would decrease the parking demand for the site. In addition, Appendix N of the DEIS (pages 142 to 145) describes parking demand management strategies that could be used to reduce the overall parking supply needed.

Parking policies and management strategies will be reviewed through the ongoing Master Plan review process; modifications could be made to the City's current parking requirements and incorporated into the Development Agreement for The Waterfront District. As future redevelopment occurs on the site, the parking supply would be evaluated for individual land use proposals and appropriate reductions could be made.

Pedestrians and Bicyclists

The transportation analyses for the EIS account for development of a full pedestrian and bicycle system connecting users throughout the site and to off-site locations. The SDEIS (page 3.12-11) indicates that the redevelopment would focus on creating a pedestrian/bicycle environment using techniques such as street narrowing, textured pavements, landscaping, street trees, and street furniture. Infrastructure improvements would be phased over time to keep pace with on-site vehicular traffic generation, and allow less vehicular infrastructure to be constructed if a greater transit/bike/walk mode share is realized in the future.

The ongoing master plan process has refined the proposed bicycle and pedestrian facilities on-site and the connections to and from the site as part of redevelopment under the Preferred and Updated Preferred Alternative. As described in the SDEIS Appendix M (pages 5 to 8) and the EIS Addendum (pages 3.5-4 to 3.5-6) and, all roadways on-site would provide a certain level of pedestrian and bicycle facilities.

Sidewalks would be provided on both sides of the on-site roadways and an extensive system of trails and parks would be provided. Commercial Street would be a "Green Street" with an open space component, and one side of the street would focus on movement of pedestrians. In addition, Central Avenue between Roeder Avenue and Holly Street would be closed to vehicular traffic providing a direct connection for bicyclist and pedestrians to and from downtown and Marina Park. With the provision of Central Avenue as a bicycle/pedestrian only facility, a direct connection from the off-site trail system to the on-site trail system would be created. This would allow users to seamlessly travel from other portions of Bellingham to The Waterfront District.

Bike lanes would be provided along Bloedel Avenue, Cornwall Avenue and portions of Commercial Street. Shared bicycle lanes would be provided on all other streets within the redevelopment. Bicycle and pedestrian trails would be provided along the shoreline of the Marine Trades area and other redevelopment areas of The Waterfront District.

Transit

Transit facilities and services would be incorporated into The Waterfront District. As described in the EIS Addendum (page 3.5-10), an extension of the existing and planned future transit service on-site via Hilton Avenue and F Street within the Marine Trades Area and Commercial Street, Bloedel Avenue and Cornwall Avenue within the other redevelopment areas is anticipated. As noted in the EIS Addendum (page 3.5-18), a key element in the ability to shift trips to non-auto modes is providing improved transit facilities and high-quality service. The EIS Addendum (page

3.5-16 to 3.5- 20) provides an evaluation of the level of transit services needed to increase the transit mode from approximately 5 to 15 percent of overall trips to/from and within The Waterfront District site. Circulation within the site, and to and from, would need to be accommodated; ideally an existing transit route would be re-routed through the site in the future. A 15 percent transit mode split is equivalent to an approximately ten minute headways for the peak direction. Achieving these aggressive goals may require bus only lanes, transit priority, and/or other facilities.

The EIS Addendum was prepared in coordination with Whatcom Transportation Authority (WTA) and it is anticipated that coordination with WTA would be ongoing to ensure adequate service and facilities for The Waterfront District in the future. The Port and City will work with WTA in partnership with WWU to develop a transit strategy that is functional for all users (refer to page 3.5-20 of the EIS Addendum for further details).

Transportation Demand Management

The EIS Addendum, SDEIS, and DEIS describe operational and management mitigation strategies including implementation of transportation demand management (TDM). These mitigation strategies are described in detail in the EIS Addendum (pages 3.5-16 to 3.5-20), and Appendix C of the EIS Addendum, and the DEIS (pages 3.12-71 through 3.12-77) and Appendix N Tables 48 and 49. The EIS Addendum expands on the notion of implementing TDM and other strategies to reduce reliance on auto travel. It discloses that an approximately 30 percent non-auto mode share (during the PM peak hour) would be needed to reduce congestion on-site and allow for better circulation in the future. Street system operations are evaluated in the EIS Addendum assuming a 30 percent shift to non-auto modes to provide an understanding of how the mitigation strategies would improve conditions.

Typically, TDM programs are implemented by individual businesses and vary with the nature of the land use. The Waterfront District redevelopment would include a range of multiple tenants and businesses making it more difficult to implement, enforce, and ultimately achieve higher mode share goals than can be the case for individual businesses or institutions (i.e. Western Washington University). Because the proposal is for a mixed use redevelopment and the individual businesses are unknown at this time, it is difficult to predict the specific level and extent of the TDM program that would be provided. To provide a conservative worst case analysis it cannot be assumed that TDM would take place absent a mechanism to administer and regulate it for the entire site; therefore, the EIS provides a worst case disclosure of transportation impacts. The Port and the City fully support implementation of TDM within The Waterfront District and intend to provide infrastructure improvements and services to allow such a program to be implemented in the future.

Summary of Responses to Comments

Several comments were received on the DEIS, SDEIS and EIS Addendum related to transportation and parking. The primary comments/questions are summarized below, followed by brief responses (see **Chapter 3** of this FEIS for the complete comments and responses).

Why does the EIS assume such a large amount of parking on the site?

- The EIS analysis of parking demand evaluates a reasonable upper level of parking supply for the purposes of disclosing potential parking impacts; although the actual

parking supply associated with redevelopment may be less than that analyzed, the analysis provides a reasonable upper level determination of potential parking impacts. It was intended to determine the impacts from redevelopment of The Waterfront District on the downtown Bellingham parking supply, and identify measures to reduce potential parking impacts since parking in the downtown core is a continual topic of discussion and concern by the community and property owners. As future redevelopment occurs on the site, the parking supply would be evaluated for individual land use proposals and appropriate reductions could be made.

How would The Waterfront District accommodate pedestrian and bicycle traffic?

- The transportation analyses for the EIS accounts for development of a full pedestrian and bicycle system connecting users throughout the site and to off-site locations. Sidewalks would be provided on both sides of the on-site roadways and an extensive system of trails and parks would be provided. Bike lanes would be provided along Bloedel Avenue, Cornwall Avenue and portions of Commercial Street. Shared bicycle lanes would be provided on all other streets within the redevelopment. Bicycle and pedestrian trails would be provided along the shoreline of the Marine Trades area and other redevelopment areas of The Waterfront District.

How would transit service be provided to The Waterfront District?

- An extension of the existing and planned future transit service on-site via Hilton Avenue and F Street within the Marine Trades Area and Commercial Street, Bloedel Avenue and Cornwall Avenue within the other redevelopment areas is anticipated for The Waterfront District. The EIS was prepared in coordination with WTA and the Port and City will continue to work with WTA in partnership with WWU to develop a transit strategy that is functional for all users.

How would infrastructure be phased and is this analyzed in the EIS?

- The Waterfront District transportation network being planned by the Port and City is designed to accommodate the needs of automobiles, pedestrians, cyclists and transit. The EIS presents an analysis of the infrastructure needed to support full buildout of the Waterfront District as well as development capacity of potential infrastructure improvements. Section 3.5.4 of the EIS Addendum presents an example of potential infrastructure sequencing and the related mitigation and associated redevelopment capacity that could be accommodated; however, it is not intended to represent the specific sequence that may occur. The analysis of infrastructure phasing and associated development capacity provides an illustration and methodology for understanding infrastructure sequencing and related development capacity. This methodology provides a basis for understanding infrastructure needs related to development, and can be applied to any sequence of redevelopment provided the total development does not exceed the range of redevelopment assumptions analyzed in the EIS. The transportation network would be installed to support redevelopment as it is phased over time. Biennial monitoring would be conducted, which would assist in determining transportation needs for proposed redevelopment.

Are transportation mitigation strategies, such as Transportation Demand Management (TDM), included as part of the EIS?

- Yes, operational and management mitigation strategies including the implementation of transportation demand management (TDM) are described in detail in the DEIS, SDEIS, and EIS Addendum. Typically, TDM programs are implemented by individual businesses and vary with the nature of the land use. Because the proposal is for a mixed use redevelopment and the individual businesses are unknown at this time, it is difficult to predict the specific level and extent of the TDM program that would be provided. To provide analysis of the reasonable upper level of transportation impacts it cannot be assumed that TDM would take place absent a mechanism to administer and regulate it for the entire site; therefore, although the actual level of vehicle trip generation may be less than that analyzed, the EIS provides a disclosure of a reasonable upper level of transportation impacts. The Port and the City fully support implementation of TDM within The Waterfront District and intend to provide infrastructure improvements and services to allow such a program to be implemented in the future.

2-3 Views

Introduction

The visual/aesthetic character of proposed site redevelopment as viewed from surrounding neighborhoods and sites has been analyzed in detail in the SEPA environmental review documents published to date (DEIS, SDEIS and EIS Addendum). A focus of the aesthetics analysis has been views from public areas and key vantage points in the surrounding area, as well as views of the shoreline, consistent with Bellingham Comprehensive Plan policies for respecting views from the community to Bellingham Bay, the San Juan Islands and hills that provide the natural backdrop to the city.

Summary of Environmental Analysis

Visual Analysis Methodology

As a first step, more than 150 photographs were taken from public areas in the vicinity of the site and onsite, representing approximately 37 separate viewpoints. These viewpoints consisted of areas available to the general public including public streets and sidewalks, parks and trails, and other publically available spaces (including Western Washington University). From this inventory, 14 of the viewpoints were selected as the most representative views of the site (based on coordination with the Port and City) to be carried forward to the DEIS for analysis. The 14 viewpoints carried forward for analysis in the DEIS include: Bellwether Park; Broadway Street near Eldridge Avenue; F Street and Bancroft Street; Maritime Heritage Park (top of steps); Wharf along north edge of the Whatcom Waterway (ASB/Marina); Bay Street near E Holly Street; Parkade Parking Structure (E Holly Street/Commercial Street); Chestnut Street and Cornwall Avenue; E Maple Street and Cornwall Avenue; E Laurel Street and N State Street; WWU Viking Union Building; South Bay Trail; Boulevard Street; and, Boulevard Park (see Figure 3.10-3 of the DEIS for the viewpoint locations). The viewpoints selected for the EIS are intended to provide representative views of site redevelopment from a range of locations.

Because of the large number of potential viewpoints to the site, it is not possible to analyze visual conditions from all potential viewpoints.

Visual simulations representing a range of redevelopment densities (i.e. 7.5 million sq. ft. of mixed use redevelopment for Alt. 1, 6 million sq. ft. of mixed use redevelopment for Alt. 2, 4.0 million sq. ft. of mixed use redevelopment for Alt. 3, and 2.0 million sq. ft. of new industrial development for Alt. 4) and varying building locations were created for each of the 14 viewpoints to provide a full range of potential visual conditions under site redevelopment. Because the theoretical development of all onsite buildings to the proposed maximum allowable heights would result in total site building area that would be substantially greater than the building area assumed for redevelopment (i.e. 7.5 million square feet under DEIS Alternative 1), only a portion of the assumed buildings are illustrated at the maximum identified height. However, to illustrate the maximum height envelope within which assumed building development could occur, each DEIS simulation for Alternative 1 includes an envelope representing the maximum building height assumed for the various areas of the site, thus, providing a worst-case illustration of potential view blockage (see page 3.10-7 of the DEIS).

DEIS Visual Analysis Conclusion

The aesthetics analysis presented in the DEIS generally concluded that "changes in the visual and aesthetic character of the site would occur incrementally over the buildout period and would substantially change the aesthetic and visual character of the site from its primarily vacant and underutilized industrial condition to a more dense urban form." Although the character of the site would substantially change with mixed-use redevelopment, the DEIS assessment does not indicate if a particular change in visual character would be adverse. The determination as to whether a particular change could be adverse should be defined by the subjective reaction of an individual viewer. For example, some viewers could perceive the change in character of the site from vacant/industrial to an urban redevelopment with a range of uses and building heights as a negative impact, while others could perceive this change as a positive condition. On an overall basis, positive or negative perceptions related to visual aesthetic character would likely be defined by the quality and consistency of building design, the public spaces that are created and the "pedestrian-friendliness of the site" (see 3.10-60 of the DEIS).

Visual Analysis Conducted Subsequent to DEIS

Subsequent to the issuance of the DEIS, the continuing Port and City master planning process included the identification of formal view corridors through the site. Included as elements of the Preferred Alternative analyzed in the SDEIS, the view corridors are intended to preserve and enhance visual connections from established neighborhoods (downtown, Old Town and Lettered Streets) through the site to Bellingham Bay, Whatcom Waterway and the site's waterfront.

To represent visual conditions under the Preferred Alternative (including view corridors) as well as to address public comments received on the DEIS, visual conditions from five viewpoints analyzed in the DEIS were reanalyzed and views from five new viewpoints were analyzed. The five viewpoints from the DEIS further analyzed in the SDEIS include: ASB/Marina; Parkade parking Structure; E Maple Street and Cornwall Avenue; and, E Laurel Street and N State Street. The five new viewpoints simulated and analyzed in the SDEIS include: Commercial Street Green; Commercial Street View Corridor; Ivy Street Green; Cornwall Beach; and, Cornwall Avenue View Corridor.

Visual conditions identified in the SDEIS were similar to those presented in the DEIS, and conclusions regarding visual impacts did not change from the DEIS.

Under the Updated Preferred Alternative analyzed in the EIS Addendum, view corridor and visual conditions were similar to those identified and analyzed in the SDEIS. However, because the updated roadway network under the Updated Preferred Alternative could result in somewhat different visual conditions from SDEIS Viewpoint 9 (E Maple Street and Cornwall Avenue) a new view simulation from Viewpoint 9 was provided for the EIS Addendum. The overall conclusions regarding visual impacts under the Updated Preferred Alternative in the EIS Addendum did not change from that identified in the DEIS and the SDEIS.

Summary of Responses to Comments

Several comments were received on the DEIS, SDEIS and EIS Addendum related to visual/aesthetic conditions. The primary comments/questions are summarized below, followed by brief responses (see **Chapter 3** of this FEIS for the complete comments and responses).

Why don't the visual simulations show all theoretical buildings at the proposed maximum allowable heights?

- Because the theoretical development of all onsite buildings to the proposed maximum allowable heights would result in total site building area that would be substantially greater than the building area assumed for redevelopment (e.g. 6.0 million square feet under DEIS Alternative 2), only a portion of the assumed buildings are illustrated at the maximum identified height. However, to illustrate the maximum height envelope within which assumed building development could occur, each DEIS simulation for Alternative 1 includes an envelope representing the maximum building height assumed for the various areas of the site, thus, providing a illustration of a reasonable upper level of potential view blockage; although the actual level of redevelopment and building heights may be less than that illustrated, the EIS provides a disclosure of a reasonable upper level of visual impacts.

Were the additional view simulations requested by the State Department of Ecology in comments on the DEIS prepared for the SDEIS?

- To represent visual conditions under the Preferred Alternative (including view corridors) as well as to address public comments received on the DEIS from the State Department of Ecology, visual conditions from five viewpoints analyzed in the DEIS were reanalyzed and views from five new viewpoints were analyzed in the SDEIS. The five viewpoints from the DEIS further analyzed in the SDEIS include: ASB/Marina; Parkade parking Structure; E Maple Street and Cornwall Avenue; and E Laurel Street and N State Street. The five new viewpoints simulated and analyzed in the SDEIS include: Commercial Street Green; Commercial Street View Corridor; Ivy Street Green; Cornwall Beach; and, Cornwall Avenue View Corridor.

2-4 Environmental Health

Introduction

The Waterfront District project includes redevelopment on six sites that are undergoing investigation and cleanup actions consistent with the State's Model Toxics Control Act (MTCA) and Sediment Management Standards (SMS). The investigation and cleanup actions at these sites are overseen by Washington State Department of Ecology (Ecology) consistent with Ecology's regulatory authority. The relationship between redevelopment of the site and the remediation of each of the six cleanup sites are evaluated in detail in the DEIS, SDEIS and EIS Addendum (two of the sites [Chlor-Alkali Plant and Pulp and Tissue Mill] were consolidated into one site [Georgia Pacific West] by Ecology for the purposes of performing the RI/FS).

Summary of Environmental Analyses

DEIS Section 3.5.2 summarizes the investigation and cleanup status at each of the cleanup sites and provides references to cleanup documents containing additional cleanup site information (note that the DEIS identified seven MTCA sites. Ecology subsequently consolidated two of the sites – the Chlor-Alkali Plant and Pulp and Tissue Mill – into one site, known as Georgia Pacific West. DEIS Section 3.5.2 also discusses the process for finalizing cleanup decisions at those sites, and how redevelopment activities would be performed consistent with cleanup and institutional control requirements developed by Ecology at each of the sites. As the DEIS describes, these actions would either avoid or mitigate potential environmental health-related impacts associated with the redevelopment.

Specific environmental health issues related to redevelopment of The Waterfront District site are primarily associated with the cleanup and institutional control requirements associated with the cleanup sites. As DEIS Section 3.5.3 describes, the cleanup decisions associated with those sites will be determined by Ecology under its MTCA and SMS regulatory authorities, and separate SEPA environmental review for the cleanup actions will be conducted prior to finalizing the cleanup decision at each site. Where contamination remains present at a site following implementation of the final cleanup, institutional controls will be required. These controls specify the measures that must be taken to maintain protectiveness of the cleanup action during future use of the property, including during construction and operation of the redevelopment. Maintaining consistency of future on-site land uses with the potential requirements of site cleanup decisions and associated institutional controls would be a fundamental premise for the Waterfront District redevelopment, as DEIS Section 3.5.3 describes.

The SDEIS and EIS Addendum described several updates to the alternatives addressed in the DEIS. As indicated in those documents, the Preferred Alternative and the Updated Preferred Alternative would not significantly affect the analysis of environmental health-related impacts and mitigation measures presented in the DEIS. Therefore, no further environmental health evaluations were conducted as part of the EIS Addendum. The cleanup process is progressing at each of the cleanup sites located within The Waterfront District site. **Table 2-1** provides a summary of the current status of each cleanup site.

Table 2-1
THE WATERFRONT DISTRICT CLEANUP SITES STATUS UPDATE

Site	Description	Stage of Cleanup Process
Cornwall Avenue Landfill	This site was used by the City for the disposal of municipal solid waste between 1953 and 1965. Under the preferred alternative, the cleanup will support a large waterfront park and mixed-use development along the bluff.	Ecology is expected to release a draft Remedial Investigation and Feasibility Study (RI/FS) for public review and comment in 2010. (The Port is serving as the lead applicant).
R.G. Haley	This site was used for the operation of a wood treatment facility between 1953 and 1986. The site is vacant and has been purchased by the City for cleanup and redevelopment.	Ecology is expected to release a draft RI/FS for public review and comment in 2011. (The City is serving as the lead applicant).
Georgia Pacific West	Chlor-Alkali Plant - GP built the Chlor-Alkali Plant in 1963 to produce chlorine and caustic soda which were used in the pulp and paper making process. The chemical plant was closed in 1999 and a number of environmental investigations were completed examining cleanup solutions which supported ongoing heavy industrial uses on the property. The Port acquired this property in 2005 and is developing new cleanup strategies which support mixed-use redevelopment.	The investigation and cleanup of these two properties is being managed by Ecology as a single cleanup site – the GP-West site. Ecology is expected to release a draft RI/FS for public review and comment in 2011. (The Port is serving as the lead applicant)
Georgia Pacific West	Pulp and Tissue Mill - GP acquired Puget Sound Pulp and Timber in 1963 and gradually expanded operations. The pulp mill closed in 2001 and the tissue plant closed in 2007. The Port acquired the property in 2005 and is developing cleanup strategies to support mixed-use redevelopment.	
Whatcom Waterway	The site is primarily contaminated by mercury discharges from GP's former Chlor Alkali Plant in the late 1960's and 1970's. The cleanup will support a number of habitat restoration and property redevelopment objectives, including a new marina, public access to the shoreline, and the creation of near-shore habitat for endangered species.	Ecology has approved a cleanup plan which is going through engineering design and permitting. Construction of the cleanup action is expected to begin in 2013. (The Port is serving as the lead applicant).
Central Waterfront	This site has historically been used to support a variety of industrial activities including a municipal and wood waste landfill, boat yards, a foundry, petroleum storage, and pulp and paper mill product storage. The cleanup will support an active Marine Trades area and mixed-use redevelopment.	Ecology is expected to release a draft RI/FS for public review and comment in 2010 (The Port is serving as the lead applicant)
I&J Waterway	This waterway site has been used since the early 1900's to support a variety of industrial activities including lumber mills, a rock crushing plant, frozen foods processing, and a seafood processing facility and the Coast Guard facility. The cleanup will support mixed-use redevelopment of the surrounding uplands and the ongoing light industrial requirements of the I&J Waterway.	Ecology is expected to release a draft RI/FS for public review and comment in late 2011 (The Port is serving as the lead applicant).

Source: Anchor QEA, 2010.

Note: This table was originally presented as Table 3.5-1 in the SDEIS. It has been updated based on current information provided by the Port and City.

Summary of Responses to Comments

Several comments were received on the DEIS, SDEIS and EIS Addendum related to environmental health topics (also see the Stormwater section of this chapter for related discussion). These comments/questions are summarized below, followed by brief responses (see **Chapter 3** of this FEIS for the complete comments and responses).

How will the requirements of site cleanup decisions and institutional controls be adhered to during site redevelopment?

- Redevelopment planning is being coordinated with the ongoing cleanup process at each site, and would be conducted consistent with the requirements stipulated in final cleanup plans selected by and overseen by Ecology and any associated institutional control requirements.

What is the role of Ecology in reviewing proposed redevelopment actions to ensure consistency with cleanup decisions and institutional controls?

- Under MTCA regulatory authority, Ecology will maintain an ongoing review and oversight role through the management of institutional control requirements during redevelopment.

What is the role of other environmental agencies during review of applicable permits required for redevelopment?

- In addition to the review provided by Ecology as part of institutional control implementation, Ecology and other federal, state, and local regulatory agencies will participate in reviews of redevelopment permit applications, consistent with their respective regulatory authorities.

How would appropriate management of contaminated soils and waters that may be disturbed during redevelopment of the cleanup sites be ensured; and, how would other measures, such as the control of stormwater/groundwater interactions or the control of soil vapors be considered during site redevelopment?

- These concerns will be addressed through the MTCA and SMS site cleanup and institutional control requirements overseen by Ecology; redevelopment planning, construction and operations would be conducted consistent with these requirements.

How would in-water redevelopment activities be integrated with sediment remediation activities, to the extent practicable?

- Planning for shoreline redevelopment is being coordinated with in-water remediation activities to the extent practicable, as stated in the Whatcom Waterway Consent Decree (Ecology, 2007). The permit process for sites with in-water components would be managed similar to the Whatcom Waterway.

How would the removal of creosote-treated wooden structures occur during potential replacement or redevelopment of the Central Avenue bridge structure?

- If this structure is removed or replaced during redevelopment, the opportunity to remove associated existing creosote-treated pilings from the waterfront would be considered.

How would the need for imported fill materials be minimized and beneficial reuse of on-site materials be implemented, where practicable?

- Beneficial reuse opportunities would be considered as part of final design and construction of the redevelopment to minimize the need for import of fill materials from offsite areas.

Other comments on the DEIS, SDEIS and EIS Addendum relate to the cleanup decisions and associated environmental reviews that are separate from this EIS for The Waterfront District redevelopment. These comments included the following:

- Ecology's comment letter on the DEIS provided clarifying/editorial comments regarding the MTCA/SMS cleanup decisions, associated environmental reviews, and, how institutional controls will be administered onsite. These comments are responded to in the Errata section of this FEIS (see **Chapter 4** of this FEIS).

- Other commentors expressed particular concerns related to specific cleanup levels, institutional control requirements, or site-specific investigation issues, such as the adequacy of information related to mercury at the former Chlor-Alkali plant site and the information available for landfills within the project area. These topics will be addressed as part of the site investigation and cleanup process overseen by Ecology at each applicable cleanup site.

- A number of commentors requested additional information relating to specific contamination issues at the cleanup sites. This information is contained in the site investigation and cleanup decision documents referenced in the DEIS and is available for review at the Ecology website, the site-specific document repositories established by Ecology, or by contacting Ecology public records coordinators (contact information available on Ecology's website).

2-5 Stormwater

Introduction

Control of stormwater runoff and protection of ground and surface water resources on and in the vicinity of the site have been important components of planning for The Waterfront District redevelopment. A temporary stormwater control system would be installed and best management practices (BMPs) would be implemented to address the potential for impacts on water resources during construction of the redevelopment. Following construction, a permanent stormwater control system would be installed to address the potential for impacts on these resources during operation of the redevelopment. These systems/measures would comply with applicable federal, state and local regulations.

Summary of Environmental Analyses

DEIS Section 3.3.1 described existing surface and groundwater resources and existing stormwater control facilities onsite and in the site area. Applicable federal, state and local surface water quality criteria, as well as existing water quality data for Bellingham Bay were also

presented. DEIS Section 3.3.2 described the proposed temporary and permanent stormwater control systems, and the applicable regulations with which they would comply. Potential water quality impacts were analyzed and appropriate mitigation measures identified, including for the proposed marina (see Appendices F and G to the DEIS for additional information). The DEIS concluded that with implementation of the proposed mitigation measures, no significant impacts to water resources would be anticipated with the proposed redevelopment.

The SDEIS described and analyzed updates to the proposed stormwater control system (see Appendix H to the SDEIS for details on this analysis). The analysis included additional information on the potential sequencing of stormwater improvements, and further evaluation of stormwater conveyance and treatment options. Additional water quality analysis was also provided that compared the potential for impacts under the Preferred Alternative to those potentially resulting from the EIS alternatives in the DEIS (see Appendix I to the SDEIS for details).

The EIS Addendum provided further updates to the EIS alternatives in the DEIS. As this document indicated, the Updated Preferred Alternative would not significantly affect the analysis of water resource impacts and mitigation measures presented in the DEIS and SDEIS. Therefore, no further water resource evaluations were conducted as part of the EIS Addendum.

Specific water resource issues and mitigation measures identified in the DEIS and SDEIS related to redevelopment of the Waterfront District site include:

- **Water Quality during Construction Activities**: Water quality would be maintained during construction activities through the use of: appropriate construction measures, BMPs, temporary erosion and sedimentation control measures, spill control measures, and applicable stormwater treatment methods. These measures/methods would comply with the *2005 Department of Ecology Stormwater Management Manual for Western Washington* (Ecology Manual) adopted by City of Bellingham and other applicable City of Bellingham and Ecology requirements. As a Phase II Municipal NPDES permit holder, the Port would have similar responsibilities to impose regulatory requirements. Water quality protection for in-water construction would be maintained by complying with requirements established in project-specific permits issued by state and federal agencies regulating that work.

- **Water Quality during Operation of the Redevelopment**: A permanent stormwater control system would be constructed and operated in accordance with the Ecology Manual (2005) adopted by City of Bellingham. This system would provide: new or upgraded stormwater conveyance facilities and outfalls where required; water quality treatment for stormwater from pollutant generating surfaces; and, low-impact development features where practicable.

- **Marina Water Quality**: The proposed marina would be designed to: optimize water circulation; minimize potential pollutant generation; maintain a spill recovery plan; establish no-wake areas to prevent erosion/sedimentation; implement BMPs outlined in the State Department of Ecology's *Resource Manual for Pollution Prevention in Marinas*; and, provide boater education programs related to pollution control and water quality protection.

Summary of Responses to Comments

Several comments were received on the DEIS, SDEIS and EIS Addendum related to stormwater control and protection of water resources. These comments/questions are summarized below, followed by brief responses (see **Chapter 3** of this FEIS for the complete comments and responses).

How would the activities of the Port and City be coordinated, as necessary, to ensure compliance with Ecology's National Pollutant Discharge Elimination System (NPDES) Phase II permit requirements?

- The Port and City would coordinate their stormwater system planning activities as part of the Development Agreement that would be executed between these parties and as part of their respective NPDES Phase II stormwater compliance programs.

How would stormwater management be addressed during transition from the existing stormwater facilities (including existing conveyance systems and use of the Aerated Stabilization Basin – ASB -- for stormwater management) to the proposed permanent stormwater control system that would be constructed with redevelopment?

- The SDEIS includes a preliminary transition concept describing how stormwater management would be addressed during sequencing of redevelopment activities. Subsequent to construction of the primary roadway network, yet prior to full buildout of all development parcels, the roadway grid would be raised above existing grades in the site areas south of the Whatcom Waterway. Parcels between the roadway segments would eventually become building pads. Prior to building development, these undeveloped areas would either be graded toward the roadway stormwater system, or stormwater runoff would be pumped to the roadway system. Water quality treatment would be provided, as necessary. Certain portions of existing stormwater facilities may still function in conjunction with the proposed system. Other portions of the existing system would be abandoned and capped, as required (see Appendix H to the SDEIS for details).

  As the SDEIS describes, the ASB is to be decommissioned during the planned remediation and prior to redevelopment of the ASB as a marina. Transition planning for the ASB includes elimination of industrial wastewater and stormwater to the ASB and development of an alternative routing of stormwater runoff from the site to an existing or new onsite stormwater management system. These transition activities for the ASB have already begun.

  Further information on the transition of stormwater control facilities would be provided during the final engineering design and permitting process for the various stages of redevelopment.

Would consideration of applicable regulatory and engineering requirements; consideration of the use of potential new stormwater treatment methods that may be available at the time of redevelopment; detailed mapping of existing systems; and, issues such as eel grass in outfall areas and anticipated sea level rise be addressed in the design of the proposed permanent stormwater control system?

- As the DEIS and SEIS indicate, compliance with applicable requirements, the potential use of new water quality treatment methods and consideration of sea level rise were taken into account in the conceptual design of the temporary and permanent stormwater control systems. Final engineering design and permitting of the proposed stormwater control system would further address all of these considerations/issues.

How would the existing stormwater infrastructure that passes through the site and carries stormwater runoff from adjacent off-site areas be protected from damage during construction and operation of the proposed redevelopment.

- The existing stormwater infrastructure that passes through the site would be mapped and protected from damage during site cleanup and redevelopment, as appropriate (if this infrastructure is not proposed to be removed/relocated with redevelopment). See Section 3.3 and Appendix H to the SDEIS for details.

How has planning for the proposed stormwater control system been coordinated with environmental cleanup requirements at the cleanup sites located within the Waterfront District site (including complying with site cleanup and institutional control requirements and accommodating environmental capping and other cleanup requirements)?

- Stormwater planning for the proposed redevelopment has considered the constraints associated with the cleanup sites located within the Waterfront District site. Final design, construction and operation of the temporary and permanent stormwater control system would be coordinated with site cleanup and institutional control requirements determined by Ecology (also see the **Environmental Health** section of this chapter).

How would potentially contaminated groundwater be appropriately managed if it is encountered during construction dewatering associated with redevelopment ?

- Where necessary (i.e. at certain cleanup sites with contaminated groundwater), construction dewatering would incorporate appropriate treatment, monitoring and disposal measures to address protection of water quality during and following construction.

Would Low Impact Development (LID) techniques be used to minimize stormwater treatment requirements; and, would certain LID techniques need to be modified to address environmental cleanup considerations?

- As indicated in the DEIS and SDEIS, the proposed stormwater control system would incorporate appropriate LID methods where practicable to reduce the amount of stormwater runoff requiring treatment. The system would take into account the environmental constraints in certain portions of the site (e.g. LID techniques that incorporate infiltration may not be appropriate in portions of the site where contaminants will remain under the proposed cap).

Would the marina design include: access to pump out facilities, implementation of BMPs, spill control/response and boater education programs?

- As indicated in the DEIS and SDEIS, these measures have been incorporated into the preliminary design of the marina and would be further refined during final design, permitting, construction and operation of the facility to address potential water quality impacts.

Is sufficient information on the proposed temporary and permanent stormwater control systems presented in the DEIS, SDEIS and EIS Addendum to understand the potential for significant impacts of the proposed redevelopment on water resources?

- The DEIS and SDEIS necessarily describe conceptual temporary and permanent stormwater control plans for the proposed redevelopment, as specific plans for building development are not proposed at this time. However, the information and analysis presented in these documents is sufficiently detailed to understand the potential for significant impacts of proposed redevelopment on water resources and to identify appropriate mitigation measures that could be incorporated into the future construction and operation of the redevelopment. As specific plans for redevelopment are formulated and applications are submitted to the City, more detailed stormwater control design and analysis of the design would be available for review.

2-6 Parks and Recreation

Introduction

A comprehensive analysis of parks, open space and recreational facilities was provided in the DEIS, SDEIS and EIS Addendum. As described in these documents, the provision of parks, open space and recreational facilities would be a key feature of the proposed Waterfront District redevelopment.

Summary of Environmental Analysis

The DEIS and SDEIS described and analyzed existing parks and recreational facilities in the City of Bellingham, as well as those proposed with The Waterfront District redevelopment. The DEIS also discussed the City's parks and recreational facilities LOS guidelines and impact fees.

As the DEIS indicated, the 2006 City of Bellingham Comprehensive Plan (amended in 2007) establishes level of service (LOS) guidelines for parks and recreational facilities in the City. These LOS guidelines represent overall levels of facilities that the City seeks to achieve on a city-wide basis and are not intended to be implemented on a project-specific basis. Overall demand for parks and recreation by the existing population and new growth in the City (including at The Waterfront District site) would be met via implementation of the City's 2008 Park, Recreation and Open Space Plan. In 2006, the City also adopted impact fee requirements for new residential developments in order to mitigate potential impacts to City of Bellingham park facilities.

Summary of Responses to Comments

A few comments were received on the DEIS, SDEIS and EIS Addendum related to proposed parks and recreational facilities. A primary comment/question is summarized below, followed by a brief response (see **Chapter 3** of this FEIS for the complete comments and responses).

What are the type, size and location of parks and recreational facilities that would be provided within the proposed redevelopment?

- As the DEIS, SDEIS and EIS Addendum described, relative to existing conditions, The Waterfront District redevelopment would provide substantially increased park, recreational and open space opportunities on the site in the form of new public parks, trails, habitat restoration areas, waterfront access and a new marina, consistent with the City's Comprehensive Plan and the project's objectives. Under the Updated Preferred Alternative, as the EIS Addendum described, it is assumed that approximately 33 acres of public parks, trails and habitat areas would be provided on The Waterfront District site. Additional aquatic lands adjacent to public parks and trails onsite could add to the project's total open space acreage. As part of the Master Development Plan process and through future parks planning and design, the City of Bellingham and the Port would evaluate and determine the specific features of the on-site parks and trail system, including the specific amount, design configuration and amenities to be included.