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February 7, 2012

Mr. Jim McCabe, Chairman
Transportation Commission
c/o Public Works Department
210 Lottie Street
Bellingham, WA 98225

Chairman McCabe and Honorable Commissioners:

Re: **RECOMMENDATIONS FOR IMPROVING THE
STAFF DRAFT FAIRHAVEN URBAN VILLAGE PLAN (UVP)**

We represent over 100 merchants and businesses owners in the Old Fairhaven Association, the Fairhaven Village Association and many commercial property owners within the Fairhaven neighborhood. We have participated in the Fairhaven planning process for a number of years and are a Party of Record in the review before you tonight.

OUR GOAL: Adopt a Fairhaven UVP that:

- Re-affirms Fairhaven as a Tier 1 Urban Village serving local & regional markets.
- Meets accepted professional planning standards,
- Complies with all SEPA requirements
- Complies with and implements the City Comprehensive Plan
- Complies with GMA goals, standards and regulations;
- Is consistent with Fairhaven development regulations adopted simultaneously.

After reviewing the December 21, 2011 staff draft report for the Fairhaven UVP, improvements to substantive areas are evident. We will comment on other planning areas to other boards, however our comments below are limited to those areas of concern to the Transportation Commission as you "provide citizen advice regarding all aspects of City transportation policy" (BMC 2.44.010). The staff draft UVP will be reviewed as an amendment to the City Comprehensive Plan, so the Transportation Commission advice is important to achieving that task. We offer the following comments for your consideration:

1. **Plan Core Vision** – Current City Comprehensive Plan designates Fairhaven as Tier 1 Urban Village, essentially a major economic center as others (CBD, Bellis Fair, St Joes, etc.). The UVP must reflect this current policy so Fairhaven can

continue its service to regional *and* local market. Fairhaven is not a convenience focused commercial area like smaller locations in Bellingham. Transportation analysis must be done in concert with this City Comprehensive Plan designation otherwise it may be deficient.

2. **Plan Boundary** – The current UVP boundary is the same as existing Fairhaven neighborhood boundary, yet proposals during the planning process raised the practical need of including two locations within the boundary: the Haggen rezone proposal (to 14th St) and a waterfront industrial/commercial area (north of Knox, Reid Boiler Works to Taylor St dock). This boundary is critical to a proper transportation analysis.
3. **Land use** – The current inventory of land uses is good, however the draft UVP does not re-affirm the core vision in item #1 above in the proposed land uses (see UVP p. 24 for example of bias for local vs. regional *and* local market). Second, proposed mixed-use locations lack analysis as to their selection. Industrial Area I-2 (Port property north of Padden Estuary) contains UVP language supporting working waterfront, yet proposed zoning permits hotels, eating & drinking establishments, retail, medical offices/clinics. There has been no deliberation of the merits of these uses on Port property instead of private property among the stakeholders. Other parts of the UVP lack a basis for some uses proposed in the development regulations. GMA requires consistency between the UVP and the underlying infrastructure, including transportation.
4. **Building Capacity** – One of the most pressing deficiencies is the draft UVP does not quantify *current* building capacity under *current* zoning (the “No Action” alternative under SEPA), the draft does not quantify the *proposed* building capacity under the staff proposed land use, and the draft lacks any other *proposed* alternatives for stakeholders to consider. Staff has jumped to their proposed land use alternative without stakeholder deliberation of the merits/deficiencies or an opportunity to present better alternatives. (See item #3 above). The build out analysis should quantify all major use categories (commercial, industrial, waterfront, mixed-use, residential, public) by alternate land use models, along a long term time line (30 years), and be consistent with the infrastructure supporting the uses (GMA requirement).
5. **Transportation** – The traffic analysis is based on staff land use model, even with deficiencies cited in #3 above; and future LOS assumed per build-out potential similar to past decade (UVP p. 43). The analysis needs to be on the same 30 year planning horizon to be internally consistent. If resulting LOS is limited to the existing arterial system, UVP must contain policy adopting the acceptable LOS consistent with the adopted land uses and build-out. This cannot happen presently since the build-out is not specified per above, nor have alternatives been considered.

6. **Water Transportation** – Fairhaven originated because of its maritime resources and easy access to the San Juan Islands, yet only 1 paragraph on page 39 speaks to this topic. Ferry service and public moorage (short term and overnight) are important to the regional market served by Fairhaven. UVP should correct this obvious deficiency for water uses and connection to the Fairhaven core.
7. **Parking** – The Inventory of existing parking system is good, but the staff draft plan lacks specificity of new parking areas within existing right-of-ways or potential parking structures. The staff draft does not build on the success of the current parking system built by the Fairhaven Village Association (FVA). City staff relied on a comprehensive parking study that presumed parking meters as the funding mechanism, and then removed the meter option with no parallel analysis for an appropriate substitute. This is a glaring deficiency as the parking supply is critical to the proposed land use. Parking must be consistent with the land use just as other utilities per GMA.
8. **Public Participation** – Concerns about improper public process have been documented in other memos. The key component is providing the opportunity for stakeholder alternatives to be vetted among the stakeholders *before* a draft document goes out for review by any City advisory board. In addition to the deficiencies in the staff draft above, relying on the staff draft as the baseline for review ignores the stakeholders who are the property owners, businesses and residents impacted by the staff plan. A more productive and inclusive process would be to work out points of agreement among the stakeholders, then forward a draft for review by others. This complies with GMA and City code requirements for public participation.

Thank you for your time to comment. We look forward to reviewing a revised draft Fairhaven Urban Village Plan that complies with GMA requirements and is consistent with the City Comprehensive Plan.

Sincerely,

Bill Geyer, AICP
Geyer & Associates, Inc.

Cc: Brent Baldwin, AICP