

## **SEPA ENVIRONMENTAL CHECKLIST**

### ***Purpose of checklist:***

Additional updates have been made in response to the City RFI issued August 7th, 2023. These updates/edits are reflected in red text.

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

### ***Instructions for applicants:*** [\[help\]](#)

Final updates have been made in response to the City RFI issued August 14th, 2024. These updates are reflected on the SEPA RFI #4 Response Exhibit A attached to this checklist.

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

### ***Instructions for Lead Agencies:***

Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

### ***Use of checklist for nonproject proposals:*** [\[help\]](#)

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the [SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS \(part D\)](#). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

## **A. BACKGROUND** [\[help\]](#)

1. Name of proposed project, if applicable: [\[help\]](#) The Woods At Viewcrest
2. Name of applicant: [\[help\]](#) Ann Jones Family Limited Partnership
3. Address and phone number of applicant and contact person: [\[help\]](#)  
Contact Person: Ali Taysi / AVT Consulting LLC, 1708 F Street, Bellingham, WA 98225, (360) 527 9445
4. Date checklist prepared: [\[help\]](#) 01.31.2022 Updated 12.04.23
5. Agency requesting checklist: [\[help\]](#) City of Bellingham
6. Proposed timing or schedule (including phasing, if applicable): [\[help\]](#)  
Land Use Permitting in ~~Q1-Q3-2022~~, Construction Permitting in ~~Q3-Q4-2022~~, Construction in ~~Q1-Q4-~~  
~~Q1 2022 - Q2 2023~~ [\[help\]](#) ~~Q3 2023 - Q1 2024~~ [\[help\]](#) ~~Q1 2024 - Q3 2024~~ [\[help\]](#) ~~Q2 2024 - Q4 2024~~  
Q1 2022 - Q4 2023  
Q1 2022 - Q1 2024  
May 2014

~~2023~~. Phasing of the development in three phases is proposed.

- 7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. [\[help\]](#)

There are no plans for future additions, expansions or further activity at this time. In the future, the proposed ~~Reserve Tract~~ (Lot 38) may be further subdivided, but there are no current plans for this subdivision.

- 8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal. [\[help\]](#)

The following environmental reports have been prepared and are attached hereto as exhibits and incorporated by reference:

Exhibit A – Project Plans ~~11.07.22~~ 06.18.23 12.04.23

Exhibit B – Critical Areas Reconnaissance & Delineation Report, Elizabeth Binney, 01.2010.

Exhibit C – Wetland Delineation Update & Critical Areas Summary, Northwest Ecological Services, 10.31.2021.

Exhibit D – Wildlife Habitat Assessment, Raedeke Associates Inc, 01.22.2022.

Exhibit E – Geotechnical Investigation & Geohazard Report, Element Solutions, 11.03.2021.

Exhibit F – Storm Water Report, Pacific Survey & Engineering, 01.22.2022 11.30.2023

Exhibit G – Traffic Impact Analysis, TENW, 07.30.2021.

Exhibit H – Cultural Resources Report, Drayton Archaeology, 07.20.2020.

- 9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain. [\[help\]](#)

The applicant is not aware of any applications pending for governmental approvals of other proposals that are in the vicinity that could affect the proposed project.

- 10. List any government approvals or permits that will be needed for your proposal, if known. [\[help\]](#)

City of Bellingham Preliminary Plat.

City of Bellingham Critical Areas Permit.

City of Bellingham Shoreline Substantial Development and Conditional Use Permit (for outfall only).

City of Bellingham Public Facility Construction Permit.

City of Bellingham Subdivision Variance.

Various City of Bellingham Building, Fire, Public Works, Storm Water, Street Tree and other associated permits.

~~(Potential) Department of Fish and Wildlife Hydraulic Project Approval (HPA), for outfall only.~~

~~(Potential) United States Army Corps Joint Aquatic Resource Permit (JARPA), for outfall only.~~

~~Project proposes to connect to existing storm system in Sea Pines Lane, no work near OIWM.~~

Outfall placed above High Tide Line (HTL)

- 11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.) [\[help\]](#)

The proposed project is the development of a 38 Lot Single Family Long Subdivision, located on an approximately 37.7-acre property. ~~In addition to 37 single family lots, the project includes a Reserve Tract (Lot 38, with 1 building site),~~ two large Open Space Tracts containing all the shoreline buffer area, construction of two new public roads, four shared private driveways, public and private water, sewer and storm water infrastructure, pedestrian improvements to abutting public street frontages, internal roads, and other accessory improvements.

- 12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available.

While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist. [\[help\]](#)  
The property is generally located in the Edgemoor Neighborhood, in Area 7, south of Viewcrest Road, north of Chuckanut Bay, east of the Briza development and west of the Clarkwood development. The property is more specifically located at 352 Viewcrest Road, approximately ½ mile west of the intersection of Chuckanut Drive and Viewcrest Road, with primary frontage on Viewcrest Road. The property is located in Township 37, Range 02 East, Section 13, and consists of four tax parcels.

## **B. ENVIRONMENTAL ELEMENTS** [\[help\]](#)

### **1. Earth**

a. General description of the site [\[help\]](#)

- Flat  Rolling  Hilly  Steep Slopes  Mountainous  
 Other [Click here to enter text.](#)

b. What is the steepest slope on the site (approximate percent slope)? [\[help\]](#)

The steepest slope on the site is approximately 80 %.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils. [\[help\]](#)

Everett-Urban Land Complex (NRCS Map Unit 52) and Nati Loam (NRCS Map Unit 110). See attached Geotechnical Investigation & Geohazard Report for additional details, Exhibit E.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. [\[help\]](#)

The portion of the site that is proposed for development does not exhibit surface indications or history of unstable soils (See Geotech Investigation, Section 4.1.1). There are areas of the site with steeper gradient, which are not proposed for development, which do exhibit evidence of unstable soils and may be classified as special hazards (Section 2.4.2).

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill. [\[help\]](#)

Excavation, fill and grading will be necessary for the construction of infrastructure including new roads and utilities, as well as for future construction of single-family residences after completion of the proposed subdivision. Grading activities, including excavation and fill, will occur in all designated road rights of way and easement areas, and on individual lots. Cuts will occur around existing rock features and, in some instances, will require cut through rock features. Fill will also occur in these areas to support road grades and reduce the need for retaining walls. Exact quantities of excavation, fill and grading activity are not known and could be impacted by conditions generated from City review of the proposed project as well as from construction activities in the field (rock, soil stability, etc....). Estimated material cut/fill volumes for all roads, driveways and homes is 12,500 cubic yards +/- of cut and 8,200 cubic yards +/- of fill. These numbers are not intended to be "not to exceed" numbers but are reflective of current design drawings plus a safety factor. It is anticipated that cut values could be reduced depending on the consistency of rock found during construction. It is also anticipated that cut/fill volumes will vary for each individual single-family residence that is constructed, depending on design, however an average cut/fill is included in this estimate for each residence.

- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. [\[help\]](#)  
Yes. Erosion could occur as a result of clearing and grading activity. Erosion could result from exposed soils, cuts necessary for roads and utilities, and other construction activities. Erosion is unlikely to occur from the ultimate use of the site for single family residential purposes.
- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? [\[help\]](#)  
The project is estimated to include approximately 238,000 square feet of new or replaced impervious surfaces, or 16% of the upland property area. Due to the fact that impervious surface amounts will vary for each individual single-family residence that is constructed, depending on design, an impervious surface safety factor of 20% is being considered, which would increase total impervious surface square footage to approximately 287,000 square feet, or 20% of the upland property area.
- h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any: [\[help\]](#)  
The project will be designed by a licensed civil engineer, utilizing best available science, consistent with adopted regulations governing clearing, grading, and infrastructure design. The design of the project will include compliance with the Department of Ecology Storm Water Manual for Western Washington, current adopted edition, and will incorporate Temporary Erosion and Sediment Control (TESC) Plans, a Storm Water Site Plan (SSP), Storm Water Pollution Prevention Plan (SWPPP) and best management practices for managing erosion and runoff. In addition, due to the proposed area of clearing, a Construction Storm Water Discharge Permit (NPDES) from the Department of Ecology will be acquired, and this permit will require monitoring and reporting from a Certified Erosion and Sediment Control Lead (CESCL), who will be responsible for ensuring that no adverse erosion or runoff results from construction activities.

## 2. Air

- a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known. [\[help\]](#)  
During construction activity emissions to air could be generated by construction equipment exhaust, mechanized tools, and from dust.  
During final occupancy of the finished single family homes emissions to air could be generated by residential vehicle exhaust and residential HVAC system exhaust.
- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. [\[help\]](#)  
None.
- c. Proposed measures to reduce or control emissions or other impacts to air, if any: [\[help\]](#)  
During construction activity the idling of construction equipment will be monitored, and in dry conditions, watering of exposed soils to reduce dust will occur.  
During final occupancy the finished single-family homes will be designed with modern, energy code compliant HVAC systems, which are designed to reduce and limit exhaust emissions.

## 3. Water

- a. Surface Water: [\[help\]](#)

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into. [\[help\]](#)  
Yes. There are four small wetlands located on the property (Wetlands A-D). See Wetland Delineation, attached as Exhibit C. Wetland A is the largest wetland on site, at 12,358 square feet in size, and is rated a Category IV wetland (lowest quality). Water from this wetland flows into a man-made ditch and then off-site through a culvert on a neighboring property, and ultimately to Chuckanut Bay. Wetland B is 9,476 square feet in size and is also rated a Category IV wetland. Water from this wetland flows into the adjacent forested upland areas and infiltrates on-site. Wetland C is the smallest wetland on site, at 991 square feet in size, and is also rated a Category IV wetland. Water from this wetland flows into the adjacent forested upland areas and infiltrates on-site. Wetland D is 1,813 square feet in size and is also rated a Category IV wetland. Water from this wetland flows south to a rock formation near the primary grade break above Chuckanut Bay, however there is no surface connection to Chuckanut Bay. Chuckanut Bay itself abuts the entire south boundary of the property. There is a steep, rocky bank that extends north from the Bay. Water from Chuckanut Bay flows southeast under the BNSF railroad trestle and ultimately into Bellingham Bay.

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans. [\[help\]](#)  
Yes. The project does include work within 200' of Wetland A, B and D. Activity occurring within 200' of these wetlands will include the construction of future single-family residences on Lot 37 and Lot 38, together with associated driveways and other site improvements, as well as the construction of a level spreader to disperse clean storm water runoff into the buffer of Wetland B, specifically to maintain the hydrology of said wetland. ~~This is the only work that will occur within 200' of the on-site wetlands. No work is proposed in the buffer area of any wetland.~~ The primary storm water outfall for the project will extend south down the bank to an outfall energy dissipater located just above the beach of Chuckanut Bay. The pipe and energy dissipater will be located within 200' of Chuckanut Bay but the pipe will be located above ground, and the energy dissipater will be placed above the existing sandstone shoreline edge and will be located above the OHWM and MHWM of the Bay, **as well as the HTL of the Bay.** These are the only improvements located within 200' of the Bay.

There is the potential that the proposed trail will generate limited impacts along the outer edge of the buffer of Wetland B.

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material. [\[help\]](#)  
~~No fill or dredge material would be placed in or removed from the wetlands. Limited fill and dredge activity will be necessary for the construction of the proposed stormwater outfall energy dissipater at the edge of the Bay. The energy dissipater will primarily consist of gabion baskets filled with 6" - 12" quarry spall, sourced from an approved pit. The dissipater will be a rectangle approximately 15' x 12' (168 square feet) in size and will require approximately 10 cubic yards of quarry spall material to be placed within the gabion baskets. This will require excavation and fill immediately above the existing sandstone shoreline edge of the Bay, but no activity at the beach level. The proposed conveyance pipe will sit on the surface of the ground, with anchoring, and will not require excavation or fill on the slope.~~

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known. [\[help\]](#)  
No.

**The revised storm outfall system will not require any excavation or dredge. The energy dissipater will be placed on a level bench above HTL. Sandstone rocks and vegetation will be installed around the dissipater to provide natural screening. No activity is proposed on the beach, below HTL, or below OHWM.**

- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

[\[help\]](#)

A portion of the property along its southern boundary, located at the toe of the slope at the beach grade, lies within a 100-year floodplain. The proposed development portion of the site sits several hundred feet above and back from the 100-year floodplain. The proposed energy dissipater will also be located above/outside the 100-year floodplain.

- 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge. [\[help\]](#)

All waste material from effluent produced in the future residences will connect to the proposed sanitary sewer system and ultimately be treated in the City's wastewater treatment plant at Post Point. All stormwater runoff will be captured and will be provided with enhanced treatment prior to either conveyance into the City storm system in Viewcrest, conveyance into Chuckanut Bay, or dispersion into Lot 38 for wetland hydration purposes. All stormwater at all three locations will go through enhanced treatment prior to discharge and so no waste materials will be present in this stormwater. See SEPA section C.2 below for additional details.

b. Ground Water:

- 1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known. [\[help\]](#)

No. Potable water and water for other purposes will be provided from the proposed water infrastructure, which will tie into the existing City of Bellingham water network. There are no proposed wells, surface water withdrawals or other non-municipal water sources to serve the project.

- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals: . . .; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve. [\[help\]](#)

No waste material from effluent sources will be discharged into the ground from the project. All waste materials of this kind will be captured in the proposed sanitary sewer infrastructure, which will tie into the existing City of Bellingham sanitary sewer network. No septic systems, industrial activities, agricultural or other waste producing activities are proposed.

c. Water runoff (including stormwater):

- 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe. [\[help\]](#)

Runoff from the completed project will be generated from the new roads, sidewalks, driveways, building roofs and other impervious surfaces incidental to single family development. This runoff will be captured in the engineered storm water management system, via downspouts and roof drains, roadside curbs and gutters and other similar features. This runoff will be routed through piped conveyance systems to three discharge points. Runoff from the northern portion of the site will be routed to a treatment module near the project entry road, then to a detention vault located along Viewcrest Road, then will tie into the existing City stormwater conveyance pipes in Viewcrest Road. The proposed pedestrian improvement along Viewcrest Road will be constructed with pervious materials and runoff from this improvement will infiltrate into the surrounding soils. Runoff from a small section of the internal road will be routed to a treatment

module and then to a level spreader discharging above grade of the buffer of Wetland B (designed to maintain the hydrology of this wetland). Runoff from the southern portion of the site will be routed to a treatment module and then via a piped conveyance down the bank to the stormwater outfall energy dissipater located ~~at the beach level~~. See the Preliminary Storm Water Site Plan, attached as Exhibit F, for additional details. **The proposed energy dissipater will be located directly above the HTL.**

- 2) Could waste materials enter ground or surface waters? If so, generally describe. [\[help\]](#)  
No. All runoff will be captured and will either be clean (roof runoff) or treated (road and driveway runoff) before discharge. Enhanced storm water treatment is required for the project and will be provided in the proposed treatment facilities shown on the attached Preliminary Storm Water Site Plan, Exhibit F. These treatment systems will fully clean all runoff to the highest standard required by applicable codes prior to any discharge.
- 3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.  
No. The north portion of the site currently drains to the north towards Viewcrest Road, and the middle and southern portions of the site currently drain south towards Chuckanut Bay. Stormwater runoff generated by the project will continue to drain in the same directions from the same portions of the site.
- d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:  
The project will be designed by a licensed civil engineer, utilizing best available science, consistent with adopted regulations governing infrastructure design and the management of stormwater runoff. The design of the project will include compliance with the Department of Ecology Storm Water Manual for Western Washington, current adopted edition, and will incorporate best management practices and design measures to control impacts to surface and ground water and drainage patterns. All waste material will be captured in proposed new utility infrastructure systems and routed to the existing municipal waste management system. All runoff will be collected and will receive enhanced treatment before being discharged. Clean storm water will be directed to the on-site wetlands to maintain their hydrology.

#### 4. Plants [\[help\]](#)

- a. Check the types of vegetation found on the site: [\[help\]](#)
- deciduous tree: alder, maple, aspen, other
  - evergreen tree: fir, cedar, pine, other
  - shrubs
  - grass
  - pasture
  - crop or grain
  - orchards, vineyards or other permanent crops.
  - wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
  - water plants: water lily, eelgrass, milfoil, other
  - other types of vegetation
- b. What kind and amount of vegetation will be removed or altered? [\[help\]](#)  
The project will result in the removal of deciduous and evergreen trees, understory shrubs and bushes, and ground cover, in areas of new roads and utilities. During the construction of single-family residences in the future, building envelopes will be cleared of similar vegetation. Based on current

road and utility designs, and assumed building envelopes for each developable lot, approximately 16% of the site will be cleared for these purposes. However, with design of individual single-family residences yet to be determined, a safety factor of 20% has been added to the clearing estimates, resulting in approximately 19% of the site being cleared for these purposes. 84% of the site will be retained in natural vegetation based on current plans, and with the safety factor, this number will be 81% of the site.

c. List threatened and endangered species known to be on or near the site. [\[help\]](#)  
There are no threatened or endangered species known to be on or near the site. There are various protected and priority habitats and species located near the site, predominantly in and around Chuckanut Bay. See attached Habitat Assessment from Raedeke for additional details, Exhibit D.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: [\[help\]](#)  
The project development area is clustered in the northern and middle portion of the property and avoids development in and around the sensitive areas on the site. No improvements are proposed in the on-site wetlands or any of their buffers. No development is proposed within the 200' shoreline jurisdictional buffer (except the required storm water conveyance pipe and outfall at the beach). Roads and infrastructure have been designed to follow the existing topography of the land and avoid rock outcroppings as much as is feasible, which will reduce required excavations and fill and limit clearing activity. Up to 80% of the site will be retained in natural vegetation. The entire shoreline area will be placed in two Open Space Tracts for permanent preservation, as will all wetlands and their buffer areas.

With the exception of a potential small impact to the buffer of Wetland B for proposed trail construction

e. List all noxious weeds and invasive species known to be on or near the site.  
None known.

## 5. Animals

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. Examples include: [\[help\]](#)  
birds: hawk, heron, eagle, songbirds, other:  
mammals: deer, bear, elk, beaver, other:  
fish: bass, salmon, trout, herring, shellfish, other \_\_\_\_\_

[Click here to enter text.](#)

b. List any threatened and endangered species known to be on or near the site. [\[help\]](#)  
None.

c. Is the site part of a migration route? If so, explain. [\[help\]](#)  
Yes. The entire property is part of the Pacific Flyway.

d. Proposed measures to preserve or enhance wildlife, if any: [\[help\]](#)  
The project design avoids any impacts to sensitive areas, including wetlands and wetland buffers. Impacts within the shoreline buffer are limited to a stormwater conveyance pipe and outfall structure. Building lots are setback from the shoreline, where most priority species are located, by a minimum of 200', and practical building envelopes on these lots are 300' to 400' from the shoreline. The shoreline area will be placed in two Open Space Tracts that will be permanently preserved with a conservation easement. This area will provide a wildlife corridor that extends from the east property line to the west property line. There will also be large areas of the property that will be maintained in natural vegetation in the northwest and northeast portions of the property, creating wildlife corridors throughout the site. Up to 80% of the site will be maintained in natural vegetation.



- e. List any invasive animal species known to be on or near the site.  
None known.

## 6. Energy and natural resources

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc. [\[help\]](#)  
The single-family residences in the completed project will utilize electricity, and potentially gas, for cooking and heating purposes, and electricity for lighting purposes.
- b. Would your project affect the potential use of solar energy by adjacent properties?  
If so, generally describe. [\[help\]](#)  
The proposed development will not generate any shading that extends off-site and negatively impacts solar access for adjacent properties. The removal of vegetation for roads and building envelopes may provide greater solar access to several select properties that are immediately adjacent to the project development area.
- c. What kinds of energy conservation features are included in the plans of this proposal?  
List other proposed measures to reduce or control energy impacts, if any: [\[help\]](#)  
Future homes will be designed and constructed to meet adopted State energy code requirements, which result in energy efficiencies in building envelope (insulation, windows and doors), lighting, and mechanical (HVAC) systems.

## 7. Environmental health

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal?  
If so, describe. [\[help\]](#)  
No extraordinary environmental health hazards will be generated by the project. It is possible that during construction activity minor environmental health hazards could be generated from fluid leakage or spills associated with construction equipment or materials. These would be ordinary and typical to a residential single-family development. There is no significant risk of any health hazards resulting from the future occupancy of single-family homes on the site.
  - 1) Describe any known or possible contamination at the site from present or past uses.  
None known. The site has been vacant for over a century and is currently vacant. There is an extremely low likelihood of any current or historic contamination of any kind on the site.
  - 2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.  
None.
  - 3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.  
None.
  - 4) Describe special emergency services that might be required.  
Regular Fire, EMS and Police service will be required during construction activity and to serve the future single-family residences when occupied. Service demands will be ordinary and typical of a medium sized single-family subdivision.

- 5) Proposed measures to reduce or control environmental health hazards, if any:  
During construction, equipment and vehicles will be appropriately monitored for spills and leaks, and spill repair kits will be provided by the contractor. If spills or leaks occur, immediate action will be taken to address them. During occupancy there will be no need for special actions to reduce or control environmental health hazards.

## **b. Noise**

- 1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? [\[help\]](#)  
Traffic noise from surrounding residential streets. Train noise from the trestle that crosses Chuckanut Bay to the south of the site.
- 2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site. [\[help\]](#)  
During construction the project will generate noise from heavy machinery, and power tools, from the felling of timbers and potentially from blasting activity associated with rock removal on site. These noises would occur during construction only. During occupancy noise will be generated from single family residents, privately owned vehicles, lawn mowers and other similar residential activities.

- 3) Proposed measures to reduce or control noise impacts, if any: [\[help\]](#)

During construction, operation of heavy equipment, and other construction related noise generating activities will be limited to regular work hours, as dictated by municipal noise ordinances. During occupancy no measures will be necessary to reduce or control noise impacts.

## **8. Land and shoreline use**

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe. [\[help\]](#)  
The site is currently vacant. Adjacent properties to the north, west and east are all developed with single family residential subdivisions, with lots that are similar in size and design to the proposed lots, and contain single family residential uses, similar to those proposed. See Exhibit A, Project Plans, for reference. The proposal is for the development of a single-family subdivision that is very similar in scale to the surrounding development. Current land uses on surrounding properties will not be affected by the proposed project.

- b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use? [\[help\]](#)

The site has not been used as working farmland. The timber on the site is not old growth, and there are historic skid roads throughout the site, which implies that the site was logged at some point in the past. Available information indicates that any logging activity occurred 100+ years ago on the site. Due to current regulations restricting the location of commercial logging activities the site no longer has forest land of long-term commercial significance. None of the site is designated as resource land.

- 1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:  
No.

- c. Describe any structures on the site. [\[help\]](#)  
There are no structures on the site.
- d. Will any structures be demolished? If so, what? [\[help\]](#)  
N/A
- e. What is the current zoning classification of the site? [\[help\]](#)  
Residential Single, 20,000 square foot density.
- f. What is the current comprehensive plan designation of the site? [\[help\]](#)  
Residential
- g. If applicable, what is the current shoreline master program designation of the site? [\[help\]](#)  
Urban Conservancy, Marine Reach K
- h. Has any part of the site been classified as a critical area by the city or county? If so, specify. [\[help\]](#)  
Yes. There are wetlands located on site, and Chuckanut Bay is adjacent to the south boundary of the site. See detailed discussion above in Section 3.a of this SEPA Checklist.
- i. Approximately how many people would reside or work in the completed project? [\[help\]](#)  
76-114 people would reside in the completed project. It is unlikely that anyone would work in the completed project, aside from incidental home business activities.
- j. Approximately how many people would the completed project displace? [\[help\]](#)  
None
- k. Proposed measures to avoid or reduce displacement impacts, if any: [\[help\]](#)  
N/A
- l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: [\[help\]](#)  
The zoning for this area is Residential Single, which is a land use designation identified in the City's Comprehensive Plan as intended for single family residential development, in this case at a gross density of 20,000 square feet per unit. As noted in Section 8.a in this SEPA checklist, surrounding development patterns predominantly consist of single-family subdivisions developed with lots of similar size to those proposed with this project. The 37.7-acre property is large enough to accommodate a gross density of approximately 80 housing units. The proposed project is the development of a single-family subdivision with 38 housing units, which is less than half of the zoned density. The design of the project includes density, lot sizes and a development layout that is similar to surrounding development, all of which is single family in nature. See Exhibit A for visual reference to the surrounding development pattern. City review of a preliminary and final plat application, critical areas permit, shoreline permit, and other associated permits will ensure that the project is consistent with applicable regulations and that appropriate mitigation is provided for project impacts.
- m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any:  
N/A

## 9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. [\[help\]](#)  
38

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing. [\[help\]](#)  
High

c. Proposed measures to reduce or control housing impacts, if any: [\[help\]](#)

The project will result in 38 new single-family homes without displacing any existing homes. These 38 homes will contribute to the City-wide housing supply, which will generate a positive impact on housing in the community.

## 10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed? [\[help\]](#)

N/A. No structures are proposed at this time. Completed single family residences in the project will be required to meet single family height standards, which are 35' utilizing City of Bellingham Height Definition #1.

b. What views in the immediate vicinity would be altered or obstructed? [\[help\]](#)

Views from surrounding properties would be altered but no views would be obstructed. Properties to the east and west have views to the south and west over Chuckanut and Bellingham Bay. These views would have limited to no impact based on the proposed project design; they are mostly closer to the water than the proposed homes, limiting the potential for alteration of their primary viewsheds. Properties to the north across Viewcrest Road currently have limited views of the surrounding forested areas, and neighboring properties, which are predominantly developed single family lots, resulting in a high level of familiarity with views of residentially developed properties in the vicinity. These views would be altered as there would be new homes located along Viewcrest Road, however large areas of mature vegetation would still be preserved within the viewshed of these homes, limiting potential impacts to views.

c. Proposed measures to reduce or control aesthetic impacts, if any: [\[help\]](#)

Retention of mature vegetation across approximately 80% of the site, including along the entire shoreline area (no clearing is proposed within 200' of the shoreline). Clustering of development lots in the middle and northern portion of the site.

## 11. Light and glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur? [\[help\]](#)

Light and glare will mostly result from the occupancy of the future single family residences and will be generated from vehicle headlights and residential lighting associated with the homes. This light and glare would occur at night.

b. Could light or glare from the finished project be a safety hazard or interfere with views? [\[help\]](#)

No. Light from vehicle headlights and residential occupancy is common in the vicinity and throughout the City, and generally does not create excessive safety hazards or interfere with views. Only 7 homes will be located along Viewcrest Road, and the remaining homes will be situated towards the interior of the site. A minimum of 200' of fully forested mature vegetation will be located between the

southern home sites and Chuckanut Bay, significantly reducing the potential for light and glare to project beyond the site boundaries.

- c. What existing off-site sources of light or glare may affect your proposal? [\[help\]](#)  
None.
- d. Proposed measures to reduce or control light and glare impacts, if any:  
See response to Section 11.b from this SEPA checklist.

## 12. Recreation

- a. What designated and informal recreational opportunities are in the immediate vicinity? [\[help\]](#)  
There are various designated and informal public recreational opportunities in the area. Chuckanut Bay itself, Arroyo Park, Fairhaven Park, Clark's Point and other parks and natural areas in the vicinity provide opportunities for walking, hiking, kayaking, paddle boarding and other activities. There are improved playground facilities at Fairhaven Park and at Fairhaven Middle School, in the vicinity.
- b. Would the proposed project displace any existing recreational uses? If so, describe. [\[help\]](#)  
No.
- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: [\[help\]](#)

The project will incorporate a public access trail that extends from Viewcrest Road through the site to Sea Pines Road (to the east). Sea Pines Road is a public road that links to an improved public access stair/path that extends to Chuckanut Bay. The location of this trail will be determined by the owner during project review and coordinated with City Parks Department to avoid impacts to critical areas.

[A proposed trail alignment has been added to the project plans.](#)

This trail is also proposed to connect from within the Plat, via East Road, to Viewcrest Road.

## 13. Historic and cultural preservation

- a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers located on or near the site? If so, specifically describe. [\[help\]](#)  
No.
- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources. [\[help\]](#)  
Along the shoreline of Chuckanut Bay there is limited evidence of Indian or historic use of the shoreline area, which is documented in several prior studies conducted around Chuckanut Bay and also in the attached Cultural Resource Assessment prepared for the project. There is no evidence of Indian or historic use or occupation above the shoreline, or in any proximity to the proposed development portion of the project. A detailed Cultural Resource Assessment was prepared by Drayton Archaeology for this project and is attached as Exhibit H.
- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc. [\[help\]](#)  
Review of publicly available data, correspondence with DAHP, and preparation of a Cultural Resource Assessment specific to the proposed project.
- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

None needed.

#### 14. Transportation

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any. [\[help\]](#)  
The project site is served by Viewcrest Road. Viewcrest Road connects to Chuckanut Drive to the east, which leads to Old Fairhaven Parkway, and Old Samish Way, both of which connect to Interstate 5. Viewcrest Road connects to Fieldston Road to the west, which leads to Old Fairhaven Parkway as well. Access to the site will be from a single intersection with Viewcrest Road.
- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop? [\[help\]](#)  
No. The nearest WTA bus line is line 105, which runs through Fairhaven and has stops along Willow Road and Chuckanut Drive in the Edgemoor Neighborhood. The nearest of these stops is approximately ½ mile from the site.
- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? [\[help\]](#)  
Each lot will be developed with a single-family residence that will have a minimum of 2 parking stalls on-site. No shared, common, or on street parking is proposed with the project.
- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private). [\[help\]](#)  
Yes. Pedestrian facilities will be added along Viewcrest Road on the frontage side of the road. New public internal roads will be constructed to serve the project. There will also be new private shared roads constructed to serve certain lots. [New trails will also be constructed providing connectivity from internal plat roads, and from Viewcrest Road, to Sea Pines Road.](#)
- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe. [\[help\]](#)  
No.
- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates? [\[help\]](#)  
The project is anticipated to generate up to 427 new weekday daily trips, with 32 new trips occurring during the weekday AM peak hour and 40 new trips occurring during the weekday PM peak hour. Less than 5% of the anticipated traffic will be from commercial or non-passenger vehicles, predominantly delivery vehicles (USPS, Fed Ex, UPS, Amazon, etc...). A detailed Traffic Impact Analysis has been prepared for the project and is attached as Exhibit G.
- g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.  
No.
- h. Proposed measures to reduce or control transportation impacts, if any: [\[help\]](#)  
A Traffic Impact Analysis has been completed for the project to evaluate the impact on the surrounding street system. New pedestrian facilities are proposed along Viewcrest Road to facilitate non-vehicular transportation options. Internal roads consolidate to a single point of intersection with Viewcrest Road, limiting conflict points with existing streets. A new trail corridor is proposed from

Viewcrest Road to Sea Pines Road to facilitate pedestrian circulation in the general area. Payment of traffic impact fees will be made for each individual lot that is developed.

**15. Public services**


- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe. [\[help\]](#)  
Yes. The addition of 38 new homes to the Edgemoor Neighborhood will increase demand on Fire, EMS, Police, Schools, Hospitals and other similar public services. This increase will be typical of single-family development. There will be no extraordinary increase in demand on public services resulting from the project.
- b. Proposed measures to reduce or control direct impacts on public services, if any. [\[help\]](#)  
Each lot, when developed will pay school, traffic and park impact fees, as well as other fees that go to offset the impact of the new demand on services. Additionally, various taxes (property taxes for example) will be assessed against each new lot; portions of these taxes go to offset the impact of the new demand on services.

**16. Utilities**

- a. Check utilities currently available at the site: [\[help\]](#)  
 electricity    natural gas    water    refuse service    telephone    sanitary sewer  
 septic system    other Comcast – Cable and Internet
- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed. [\[help\]](#)  
 The proposed project will include the extension of electricity, gas, water and sewer, refuse service and communications infrastructure into the site. All of these utilities currently are available in Viewcrest Road, and these lines will be extended into the site along the proposed new public and private roads to serve each new lot. Construction activities will include trenching, laying of conduit and other typical improvements related to utility service extensions.

**C. SIGNATURE [\[HELP\]](#)**

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: \_\_\_\_\_ 

Name of signee Ali Taysi

Position and Agency/Organization AVT Consulting/Principal

Date Submitted: 03.02.2022   Updated 11.07.22   Updated 06.18.23   Updated 12.04.23 in order to amend references to storm system design.

Updated 12.19.24 in response to City RFI#4.

## SEPA Exhibit A – 12.19.24

The following sections of the project SEPA checklist have been updated to address the City of Bellingham RFI#4:

A.4 Date Checklist prepared: Checklist Updated December 19<sup>th</sup>, 2024.

A.6 Proposed timing or scheduling: Land Use Permitting Q1 2022-Q2 2025, Construction Permitting, Q2 2025-Q4 2025, Construction (Phase I), Q1 2026-Q4 2026.

A.8 List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

In addition to the reports and plans referenced in the body of the SEPA Checklist, the following additional reports, or updates to reports, have been made and incorporated into the project record:

- Critical Areas Impact Assessment and Mitigation Plan, Northwest Ecological Services, November 2024.
- Wetlands and HCA Report Addendum Memorandum, Northwest Ecological Services, November 2024.
- Wildlife Habitat Assessment, Raedeke Associates Inc, Updated November 22<sup>nd</sup>, 2024.
- Technical Memorandum RFI#4 Response, Raedeke & Associates, November 22<sup>nd</sup>, 2024.
- Memorandum #2 – Response to Public Comment & COB RFI #4, Element Solutions, November 22<sup>nd</sup>, 2024
- Geohazard Review Addendum – Stormwater Outfall Plan, Element Solutions, November 22<sup>nd</sup>, 2024.
- Preliminary Storm Water Report, Pacific Survey & Engineering, Updated November 22<sup>nd</sup>, 2024.
- Cultural Resources Report, Drayton Archaeology, Updated October 28<sup>th</sup>, 2024.

### B.5 Animals

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site.

In addition to the response in the body of the SEPA Checklist, please refer to the reports provided by NES and Raedeke (identified in SEPA section A.8 above) which provide details on bird and other animal species present on the site or with the potential to be present on



the site. This includes any state or federally listed threatened or endangered species that utilize Chuckanut Bay and Chuckanut Creek, Pileated Woodpecker, cavity nesting birds, and/or other species. These reports included review of the City Nearshore Connectivity Study, determination of the area qualifying as a Washington State Priority Area (Biodiversity Area) and the results of an “area of interest” request to WDFW for “sensitive” PHS data.

b. List any threatened and endangered species known to be on or near the site.

Please refer to the reports provided by NES and Raedeke (identified in SEPA section A.8 above) which provide details on bird and other animal species present on the site or with the potential to be present on the site, including any threatened or endangered species.

c. Is the site part of a migration route?

In addition to the response in the body of the SEPA Checklist, referencing the Pacific Flyway, the Property is also part of a local habitat corridor. In the City’s Wildlife Corridor Analysis Report (2021) the Property is identified as part of an Important Wildlife Habitat Area with Important Wildlife Corridors at the southwest and southeast project corners, which connect to other Important Wildlife Habitat areas to the east and west. Please refer to the reports provided by NES and Raedeke (identified in SEPA section A.8 above)

d. Proposed measures to preserve or enhance wildlife, if any:

In addition to the response in the body of the SEPA Checklist, which details a number of mitigation measures that are proposed to be implemented with the project, either through design or conditions, please also see recommendations in the NES and Raedeke reports (identified in SEPA section A.8 above) and the SEPA mitigating measures exhibit attached to the RFI#4 response letter from Chmelik Sitkin and Davis attorneys, which details additional proposed mitigation for project impacts, including impacts to wildlife and habitat.