

Aven, Heather M.

From: noreply@cob.org on behalf of City of Bellingham <noreply@cob.org>
Sent: Friday, April 5, 2024 10:06 PM
To: G.Proj.Wood at Viewcrest
Subject: Public Comment -Arlie Daniels
Attachments: Public Comment - 657.pdf



City of Bellingham

Public Comment

Entry Details

NAME	Arlie Daniels
CHOOSE TOPIC	The Woods at Viewcrest
COMMENT OR TESTIMONY	I do not support the proposed development of the cliffs of Mud Bay. If all of the pristine areas are developed upon there simply will be no pristine areas left. This would have a negative impact on the ecosystem and may possibly open the gates for development in other special areas. We are extremely fortunate to live in such a beautiful area and it's our duty to protect undeveloped areas to keep it beautiful.
EMAIL	arlie_daniels@hotmail.com
DATE	4/5/2024

Aven, Heather M.

From: caroline driscoll <cdriscoll1990@gmail.com>
Sent: Friday, April 5, 2024 4:43 PM
To: Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.
Subject: viewcrest subdivision

Some people who received this message don't often get email from cdriscoll1990@gmail.com. [Learn why this is important](#)

CAUTION: This message originated from outside of this organization. Please exercise caution with links and attachments.

To: Kathy Bell, Senior Planner, kbell@cob.org

Steve Sundin, Senior Planner, ssundin@cob.org

Blake Lyon, Planning & Community Development Department Director, bglyon@cob.org

Planning & Community Development Department

210 Lottie Street

Bellingham, WA 98225

From: Caroline Driscoll, 407

4/5/2024

Subject: Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

Dear Ms. Bell, Mr. Sundin, and Mr. Lyon,

I ask you to prevent harms to Bellingham's publicly-owned spaces connected to Mud Bay Cliffs, and to safeguard our community against known and severe subdivision development risks, by requiring an Environmental Impact Statement (EIS) be prepared for *The Woods at Viewcrest*, a proposed subdivision on the mature woodlands and wetlands of Mud Bay Cliffs.

Traffic Safety and Level of Service. Traffic safety issues have been well documented on Edgemoor's narrow, hilly roads with limited sightlines, including where Viewcrest Road intersects Chuckanut Drive (State Route 11). The traffic conditions where Fairhaven Middle School meets the 12th Street Bridge are particularly dangerous. These well-documented

issues create precarious and unsafe conditions for walkers, runners, cyclists, and motorists. The city has been notified of these hazardous conditions but has yet to take any action to mitigate them.

I ask the city to protect our public interest and prevent harms to the community:

Require an Environmental Impact Statement, so that any permit decisions are based on a full understanding of the risks to the environment, and to public safety.

Sincerely,

Caroline Driscoll

Aven, Heather M.

From: Hale Dwoskin <HaleD@sedona.com>
Sent: Friday, April 5, 2024 1:00 PM
To: Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.
Cc: Amy Edwards
Subject: Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

Some people who received this message don't often get email from haled@sedona.com. [Learn why this is important](#)

CAUTION: This message originated from outside of this organization. Please exercise caution with links and attachments.

Dear Ms. Bell, Mr. Sundin, and Mr. Lyon,

I ask you to prevent harms to Bellingham's publicly-owned spaces connected to Mud Bay Cliffs, and to safeguard our community against known and severe subdivision development risks, by requiring an Environmental Impact Statement (EIS) be prepared for *The Woods at Viewcrest*, a proposed subdivision on the mature woodlands and wetlands of Mud Bay Cliffs.

The proposed subdivision (of 4 current lots into 38 proposed lots, with up to 152 housing units) would likely impose **significant adverse impacts to the environment**. In addition to these adverse impacts, the developer's application materials are flawed in substantive ways, which further exposes the public's interests, including public investments in neighboring fish and wildlife habitats, to considerable risk. The likely significant adverse impacts, coupled with the substantive application flaws, compel the city to issue a State Environmental Protection Act (SEPA) Determination of Significance and require an EIS.

A. Unique and Special Site. The location of the proposed subdivision is unique both in its **specific characteristics** and its **physical setting**. These unique characteristics and physical setting are important factors that influence why the current subdivision proposal is likely to have significant adverse environmental impacts. The site of this proposed subdivision is currently distinguished by these features:

Specific Characteristics

- **Important Habitat Hub.** The 2021 City of Bellingham *Wildlife Corridor Analysis* designates this property, which consists of rare mature shoreline woodlands and wetlands habitat, as an *Important Habitat Hub* – and one of the only *Important Habitat Hubs* in south Bellingham that remains unprotected.

- **Geohazards.** Significant landslide, erosion and seismic hazards exist throughout the site, and they are sensitive to development disturbances including hydrological changes.
- **Storm Microclimate.** This location is well-known locally for its microclimate of gales during storms – among the strongest gales in Bellingham. Gale intensity has been increasing over the past decade due to climate change. The existing mature woodland acts as a protective buffer for wildlife (both resident and sheltering), and for the community.

Physical Setting

- **Wildlife Network.** This *Important Habitat Hub* is the center part that links two other *Important Habitat Hubs* – Clark’s Point and Chuckanut Village Marsh/ Chuckanut Bay Open Space – all of which are connected to a larger, protected *Wildlife Network*. The public has invested heavily to protect and maintain the Hubs and Corridors of this Wildlife Network.
- **Estuarine Wetlands.** Mud Bay Cliffs is a key watershed adjacent to Mud Bay’s Category I Estuarine Wetlands.
- **Stormwater.** Most drainage from this site flows directly into the Mud Bay Estuarine Wetlands. Drainage discharges from existing city stormwater outlets have already begun to impair the health of this wetland habitat.
- **Great Blue Herons.** The Post Point Colony of Great Blue Herons relies on this site for shelter, and on the Mud Bay Estuarine Wetlands to feed their young. This Heron Colony fled its previous home near Chuckanut Bay as a result of subdivision development activity. Significant public investment has been made to provide habitat protection for this Colony at its new Post Point nesting location.
- **Salmon.** Juvenile salmonids rely on clean water and safe passage through the Mud Bay Estuarine Wetlands, Chuckanut Village Marsh, and Chuckanut Creek. Significant public investment has been made to restore these habitats for salmon.
- **Traffic Safety and Level of Service.**
 - Traffic safety issues have been well documented on Edgemoor’s narrow, hilly roads with limited sightlines, including where Viewcrest Road intersects Chuckanut Drive (State Route 11). The traffic conditions where Fairhaven Middle School meets the 12th Street Bridge are particularly dangerous. These well-documented issues create precarious and

unsafe conditions for walkers, runners, cyclists, and motorists. The city has been notified of these hazardous conditions but has yet to take any action to mitigate them.

- Viewcrest Road and the roadways it intersects provide unique access to important public amenities. These amenities tend to have more visitors seasonally and on weekends. Viewcrest's intersection with Chuckanut Drive is significant as an access point to public amenities including Clark's Point, Hundred Acre Woods (trailhead at the intersection), and the Chuckanut Scenic Byway (which itself is the sole access to multiple public parklands, trail systems, and public natural amenities).

B. Severe Application Flaws. The proposed subdivision application is severely flawed. Objective and comprehensive assessments suitable to this unique site and setting must be completed to address these flaws before an informed consideration of any subdivision proposals can be made. For example:

- The Stormwater Management Plan is incomplete, lacking key required plan elements. As proposed, the subdivision would result in significant increases in runoff volumes, speeds, and sediment/pollution loads. Moreover, by discharging polluted stormwater into the Mud Bay Estuarine Wetlands, significant adverse environmental impacts are probable. The plan fails to address how the ecologically sensitive Mud Bay Estuarine Wetlands, and the Public Shoreline, will be impacted by this development.
- The Wildlife Habitat Assessment fails to: identify this site as an *Important Habitat Hub* connected to other nearby hubs by two Important Habitat Corridors; address the harmful wildlife *Habitat Network* fragmentation the proposed development would cause; address impacts to the Mud Bay Estuarine Wetlands and salmon habitat of Chuckanut Village Marsh and Chuckanut Creek; address impacts to the Post Point Heron Colony (feeding and sheltering); provide a sufficient wildlife inventory.
- The Geotechnical Investigation & Geohazard Report fails to assess the impact of development on groundwater flow and the likely increase in probability, frequency and magnitude of flooding, erosion, and landslide activity. It is documented that development activities would likely make the site hazardous for the subdivision residents, neighbors, and the community at large. These dangers would begin with development disturbances, and would persist for decades to come.
- There is no Hydrology assessment at all, which this unique site's characteristics and setting necessitate. A Hydrology report is essential to evaluate potential

environmental impacts, and ensure that any development at this site will not harm local ecosystems and water quality. Clearly, development of infrastructure such as roads, retention walls, driveways, structures and other hardscaping will alter the topography and the flow of water on this geologically complex site. With soils disturbances and proposed infrastructure cutting across the site, it is probable that saturation, drainage, and flooding would be greatly affected. Erosion, rockfall, landslide and flooding to the north would be likely, unless plans are developed using Hydrology information. These likely impacts could severely affect neighboring public and private lands, waters, and wildlife habitat.

- The applicant has failed to show how tree removal during both initial infrastructure development, and then later by lot owners, would impact the **mature woodland**. There is no assessment for how the gales from worsening storms, combined with extensive tree removal, would impact sheltering wildlife and public safety. There is no assessment of how the remaining trees in the proposed narrow 200-foot “buffer” along the shoreline would be affected by adjacent tree removal; it is probable that tree removal would degrade the health of nearby trees in the proposed “buffer” wildlife habitat connecting two Important Habitat Hubs.
- The Traffic Impact Analysis fails to address how Levels of Service to public parks, public natural amenities, and scenic byway would be impacted by traffic from this development. Further, it fails to address the known public safety issues which would be exacerbated by increased traffic from the 152 potential new housing units, since fourplexes would be allowed on all 38 lots under a new statewide law.

Because of this site’s unique specific characteristics and unique physical setting, and because of the subdivision application’s profound flaws, the city does not have the accurate, sufficient, and objective information it needs to identify and assess potential significant adverse impacts.

Moreover, the application materials themselves indicate that the proposal is likely to have a significant adverse impact on the natural environment, the built environment, and public health and safety.

I ask the city to protect our public interest and prevent harms to the community:

Require an Environmental Impact Statement, so that any permit decisions are based on a full understanding of the risks to the environment, and to public safety.

Hale Dwoskin
President

Sedona Press &
Sedona Training Associates

www.sedona.com

<https://www.facebook.com/TheSedonaMethod>

www.youtube.com/thesedonamethod

<https://www.sedona.com/podcast-letting-go>

www.huffingtonpost.com/hale-dwoskin

Aven, Heather M.

From: noreply@cob.org on behalf of City of Bellingham <noreply@cob.org>
Sent: Friday, April 5, 2024 1:05 PM
To: G.Proj.Wood at Viewcrest
Subject: Public Comment -Amy Edwards
Attachments: Public Comment - 656.pdf



City of Bellingham

Public Comment

Entry Details

NAME	Amy Edwards
CHOOSE TOPIC	The Woods at Viewcrest
COMMENT OR TESTIMONY	I ask you to prevent harms to Bellingham’s publicly-owned spaces connected to Mud Bay Cliffs, and to safeguard our community against known and severe subdivision development risks, by requiring an Environmental Impact Statement (EIS) be prepared for The Woods at Viewcrest, a proposed subdivision on the mature woodlands and wetlands of Mud Bay Cliffs. The proposed subdivision (of 4 current lots into 38 proposed lots, with up to 152 housing units) would likely impose significant adverse impacts to the environment. In addition to these adverse impacts, the developer’s application materials are flawed in substantive ways, which further exposes the public’s

interests, including public investments in neighboring fish and wildlife habitats, to considerable risk. The likely significant adverse impacts, coupled with the substantive application flaws, compel the city to issue a State Environmental Protection Act (SEPA) Determination of Significance and require an EIS.

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Specific Characteristics

- Important Habitat Hub. The 2021 City of Bellingham Wildlife Corridor Analysis designates this property, which consists of rare mature shoreline woodlands and wetlands habitat, as an Important Habitat Hub – and one of the only Important Habitat Hubs in south Bellingham that remains unprotected.
- Geohazards. Significant landslide, erosion and seismic hazards exist throughout the site, and they are sensitive to development disturbances including hydrological changes.
- Storm Microclimate. This location is well-known locally for its microclimate of gales during storms – among the strongest gales in Bellingham. Gale intensity has been increasing over the past decade due to climate change. The existing mature woodland acts as a protective buffer for wildlife (both resident and sheltering), and for the community.

Physical Setting

- Wildlife Network. This Important Habitat Hub is the center part that links two other Important Habitat Hubs – Clark's Point and Chuckanut Village Marsh/ Chuckanut Bay Open Space – all of which are connected to a larger, protected Wildlife Network. The public has invested heavily to protect and maintain the Hubs and Corridors of this Wildlife Network.
- Estuarine Wetlands. Mud Bay Cliffs is a key

watershed adjacent to Mud Bay's Category I Estuarine Wetlands.

- Stormwater. Most drainage from this site flows directly into the Mud Bay Estuarine Wetlands. Drainage discharges from existing city stormwater outlets have already begun to impair the health of this wetland habitat.

- Great Blue Herons. The Post Point Colony of Great Blue Herons relies on this site for shelter, and on the Mud Bay Estuarine Wetlands to feed their young. This Heron Colony fled its previous home near Chuckanut Bay as a result of subdivision development activity. Significant public investment has been made to provide habitat protection for this Colony at its new Post Point nesting location.

- Salmon. Juvenile salmonids rely on clean water and safe passage through the Mud Bay Estuarine Wetlands, Chuckanut Village Marsh, and Chuckanut Creek. Significant public investment has been made to restore these habitats for salmon.

- Traffic Safety and Level of Service.

- o Traffic safety issues have been well documented on Edgemoor's narrow, hilly roads with limited sightlines, including where Viewcrest Road intersects Chuckanut Drive (State Route 11). The traffic conditions where Fairhaven Middle School meets the 12th Street Bridge are particularly dangerous.

- These well-documented issues create precarious and unsafe conditions for walkers, runners, cyclists, and motorists. The city has been notified of these hazardous conditions but has yet to take any action to mitigate them.

- o Viewcrest Road and the roadways it intersects provide unique access to important public amenities. These amenities tend to have more visitors seasonally and on weekends. Viewcrest's intersection with Chuckanut Drive is significant as an access point to public amenities including Clark's Point, Hundred Acre Woods (trailhead at the intersection), and the Chuckanut Scenic Byway (which itself is the sole access to multiple public parklands, trail systems, and public natural amenities).

B. Severe Application Flaws. The proposed subdivision application is severely flawed. Objective and comprehensive assessments suitable to this unique site and setting must be completed to address these flaws before an informed consideration of any subdivision proposals can be made. For example:

- The Stormwater Management Plan is incomplete, lacking key required plan elements. As proposed, the subdivision would result in significant increases in runoff volumes, speeds, and sediment/pollution loads. Moreover, by discharging polluted stormwater into the Mud Bay Estuarine Wetlands, significant adverse environmental impacts are probable. The plan fails to address how the ecologically sensitive Mud Bay Estuarine Wetlands, and the Public Shoreline, will be impacted by this development.

- The Wildlife Habitat Assessment fails to: identify this site as an Important Habitat Hub connected to other nearby hubs by two Important Habitat Corridors; address the harmful wildlife Habitat Network fragmentation the proposed development would cause; address impacts to the Mud Bay Estuarine Wetlands and salmon habitat of Chuckanut Village Marsh and Chuckanut Creek; address impacts to the Post Point Heron Colony (feeding and sheltering); provide a sufficient wildlife inventory.

- The Geotechnical Investigation & Geohazard Report fails to assess the impact of development on groundwater flow and the likely increase in probability, frequency and magnitude of flooding, erosion, and landslide activity. It is documented that development activities would likely make the site hazardous for the subdivision residents, neighbors, and the community at large. These dangers would begin with development disturbances, and would persist for decades to come.

- There is no Hydrology assessment at all, which this unique site's characteristics and setting necessitate. A Hydrology report is essential to evaluate potential environmental

impacts, and ensure that any development at this site will not harm local ecosystems and water quality. Clearly, development of infrastructure such as roads, retention walls, driveways, structures and other hardscaping will alter the topography and the flow of water on this geologically complex site. With soils disturbances and proposed infrastructure cutting across the site, it is probable that saturation, drainage, and flooding would be greatly affected. Erosion, rockfall, landslide and flooding to the north would be likely, unless plans are developed using Hydrology information. These likely impacts could severely affect neighboring public and private lands, waters, and wildlife habitat.

- The applicant has failed to show how tree removal during both initial infrastructure development, and then later by lot owners, would impact the mature woodland. There is no assessment for how the gales from worsening storms, combined with extensive tree removal, would impact sheltering wildlife and public safety. There is no assessment of how the remaining trees in the proposed narrow 200-foot “buffer” along the shoreline would be affected by adjacent tree removal; it is probable that tree removal would degrade the health of nearby trees in the proposed “buffer” wildlife habitat connecting two Important Habitat Hubs.

- The Traffic Impact Analysis fails to address how Levels of Service to public parks, public natural amenities, and scenic byway would be impacted by traffic from this development. Further, it fails to address the known public safety issues which would be exacerbated by increased traffic from the 152 potential new housing units, since fourplexes would be allowed on all 38 lots under a new statewide law.

Because of this site’s unique specific characteristics and unique physical setting, and because of the subdivision application’s profound flaws, the city does not have the accurate, sufficient, and objective information it needs to identify and assess potential

significant adverse impacts.
Moreover, the application materials themselves indicate that the proposal is likely to have a significant adverse impact on the natural environment, the built environment, and public health and safety.
I ask the city to protect our public interest and prevent harms to the community:
Require an Environmental Impact Statement, so that any permit decisions are based on a full understanding of the risks to the environment, and to public safety.

EMAIL

amye@sedona.com

DATE

4/5/2024

Aven, Heather M.

From: good luck charm <bellwid@comcast.net>
Sent: Friday, April 5, 2024 2:49 PM
To: Bell, Kathy M.; FN - bls@cob.org
Subject: EIS for MUD BAY Cliffs, please consider

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Dear Kathy Bell, Steve Sundin, Blake Lyon,

From: Pat Gerdson

500 Bayside Rd

Bellingham WA 98225

April 5, 2024

Subject: Please Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

I ask you to prevent harms to Bellingham's publicly-owned spaces connected to Mud Bay Cliffs, and to safeguard our community against known and severe subdivision development risks, by requiring an Environmental Impact Statement (EIS) be prepared for *The Woods at Viewcrest*, a proposed subdivision on the mature woodlands and wetlands of Mud Bay Cliffs. The proposed subdivision (of 4 current lots into 38 proposed lots, with up to 152 housing units) would likely impose **significant adverse impacts to the environment**. In addition to these adverse impacts, the developer's application materials are flawed in substantive ways, which further exposes the public's interests, including public investments in neighboring fish and wildlife habitats, to considerable risk. The likely significant adverse impacts, coupled with the substantive application flaws, compel the city to issue a State Environmental Protection Act (SEPA) Determination of Significance and require an EIS.

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Geohazards. Significant landslide, erosion and seismic hazards exist throughout the site, and they are sensitive to development disturbances including hydrological changes.

Storm Microclimate. This location is well-known locally for its microclimate of gales during storms – among the strongest gales in Bellingham. Gale intensity has been increasing over the past decade due to climate change. The existing mature woodland acts as a protective buffer for wildlife (both resident and sheltering), and for the community.

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For example: The Stormwater Management Plan is incomplete, lacking key required plan elements. As proposed, the subdivision would result in significant increases in runoff volumes, speeds, and sediment/pollution loads. Moreover, by discharging polluted stormwater into the Mud Bay Estuarine

Wetlands, significant adverse environmental impacts are probable. The plan fails to address how the ecologically sensitive Mud Bay Estuarine Wetlands, and the Public Shoreline, will be impacted by this development.

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There is no Hydrology assessment at all, which this unique site's characteristics and setting necessitate. A Hydrology report is essential to evaluate potential environmental impacts, and ensure that any development at this site will not harm local ecosystems and water quality. Clearly, development of infrastructure such as roads, retention walls, driveways, structures and other hardscaping will alter the topography and the flow of water on this geologically complex site. With soils disturbances and proposed infrastructure cutting across the site, it is probable that saturation, drainage, and flooding would be greatly affected. Erosion, rockfall, landslide and flooding to the north would be likely, unless plans are developed using Hydrology information. These likely impacts could severely affect neighboring public and private lands, waters, and wildlife habitat. The applicant has failed to show how tree removal during both initial infrastructure development, and then later by lot owners, would impact the **mature woodland**. There is no assessment for how the gales from worsening storms, combined with extensive tree removal, would impact sheltering wildlife and public safety. There is no assessment of how the remaining trees in the proposed narrow 200-foot "buffer" along the shoreline would be affected by adjacent tree removal; it is probable that tree removal would degrade the health of nearby trees in the proposed "buffer" wildlife habitat connecting two Important Habitat Hubs.

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I ask the city to protect our public interest and prevent harms to the community:

Require an Environmental Impact Statement, so that any permit decisions are based on a full understanding of the risks to the environment, and to public safety.

I sincerely hope our concerns will be taken seriously as this is an entirely ridiculous proposal for development on these cliffs in light of all the awareness we now have of the deleterious effects to the entire ecosystem.

Respectfully,

Pat Gerdson

Aven, Heather M.

From: Marian Neevel <mneevil@gmail.com>
Sent: Friday, April 5, 2024 2:06 PM
To: Bell, Kathy M.
Subject: Mud Bay

You don't often get email from mneevil@gmail.com. [Learn why this is important](#)

CAUTION: This message originated from outside of this organization. Please exercise caution with links and attachments.

Please accept this email as my request to receive via email all notices regarding the Woods at Viewcrest applications. Thanks Marian Neevel

Aven, Heather M.

From: Kelcie Sheriff <ksjlm96@yahoo.com>
Sent: Friday, April 5, 2024 1:54 PM
To: G.Proj.Wood at Viewcrest
Cc: Kelcie Sheriff
Subject: Proposal Comment - The Woods at Viewcrest

You don't often get email from ksjlm96@yahoo.com. [Learn why this is important](#)

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Dear Kathy Bell, Steve Sundin, and other Interested Parties,

I am a resident of the neighborhood adjacent to the Jones' property on Viewcrest Road. I am very concerned about the following in regards to the development:

- Damage to the Mud Bay estuarine wetlands
- Harm to wildlife, including salmon and great blue herons
- Degradation of important wildlife habitat areas and wildlife corridors
- Removal of mature trees, reduced carbon capture and increased wind damage
- Increased erosion and landslides

In addition, I am concerned about traffic density and safety.

Traveling along Viewcrest Road is currently very scary as a pedestrian and driver. It requires incredible attention and slow speeds. There is very little traffic on the road so that helps with the hazards but when the school bus goes through 6 times per day or other public service vehicles like SSC, cars have to pull over and stop to let them by.

There are many blind spots and areas where you have to hug the shoulder to safely travel over the hill because you cannot see on-

coming traffic (and hope they are doing the same). There are very few areas along Viewcrest between Chuckanut and Fieldston where you can easily see other traffic. There is no center line, no sidewalks, and at many spots, I pull over onto someone's lawn to allow for traffic flow. It is precarious at best. And, this is with the current traffic load.

My concern is the added traffic flow from a subdivision of 35+ homes. I cannot imagine the danger to my neighbors and myself if this is allowed. I can see the street being able to handle 4 or 5 more lots, but there is no way our road can safely handle more.

Please do not allow this subdivision to be built.

Please provide me notification of action taken.

Thank you for your consideration,

Kelcie Sheriff

332 Viewcrest Rd

Bellingham, WA 98229

360-961-9801

Aven, Heather M.

From: Serena Tyran <sgtyran@gmail.com>
Sent: Friday, April 5, 2024 9:16 AM
To: Lyon, Blake G.; Bell, Kathy M.; Sundin, Steven C.
Subject: Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

Some people who received this message don't often get email from sgtyran@gmail.com. [Learn why this is important](#)

CAUTION: This message originated from outside of this organization. Please exercise caution with links and attachments.

Dear Ms. Bell, Mr. Sundin, and Mr. Lyon,

I've been having nightmares about the development of Chuckanut Bay for years. Not figuratively, but literally. When I was 8: an overpass over the railroad causeway. When I was 10: the trees on the hillside felled. When I was 12: Houses in the place of forest. Now, at 21, the dream has become lucid.

The Chuckanut Bay hillside is my happy place. It's my comfort. It's my home, just as it's home to the salal and the eagles and the wind. I've left pieces of my soul along the deer trails and rocks, trusting nowhere else to keep them safe. When I say that Chuckanut Bay is everything to me, I want you to know I mean it. It's where I learned to climb. It's where I learned to paint. It's where I learned to wallow in sadness and run for joy. It's where I learned to connect with nature, with history, and with myself.

I spent my childhood exploring the intricate labyrinthine pathways that trace the bay. It's stunning. If you've never walked all the way from Woodstock to the tunnel at low tide, or climbed up chimneys to the zenith of magnificent sandstone cliffs, or sat atop a beach boulder in the sun-- god, I can't explain it. It's perfect, at least to me. The forest there is like nothing I've ever seen. The steepness of the terrain and the airy bark of madrones lend an ethereal power to the wind. The clay in the soil and the warm yellow of the rock are earthy and soothing.

And I'm not the only one. Chuckanut Village has sustained itself for over 100 years. We've built our community between the wetlands and the water. It's special. I cannot articulate the depth of it. If you grew up there, you feel it in your bones. For the families that have been there for generations; I cannot begin to comprehend what they are going through. I know people who scattered the ashes of their loved ones in the water. Imagine creating a life for yourself beneath the same hillside for a century, and then being preached to about the inevitability of change.

Chuckanut Bay is not a neglected empty lot. It is not the 'missing link of Edgemore'. It is not something to be filled in. It's full enough; to tear what is already there away would be to empty it of its very essence. I see more eagles in the trees there than I have anywhere else. I have climbed trees

that deny gravity by clinging to fissures in cliffs. I have listened to fish jump at sundown. I will do everything in my power to protect this land.

Chuckanut Bay is already polluted— the train causeway has resulted in continuous build-up of mud for decades. The forest above, though, is pristine, as are the rocky shoreline and scattered coastal shrubs. The evidence of humans is limited to the occasional rope ladder or name scratched into sandstone. The Chuckanut Bay hillside deserves to be preserved because it is uniquely wild. We have preserved Clark Point and Hundred Acre Woods. Chuckanut Bay deserves the same.

Additionally, the proposed development is unrealistic. I urge you to visit Mud Bay and explore the hillside. It is formed of layered 100 foot cliffs and steep hills held together with mud and roots. If anywhere on the downslope of the hill were to be developed or leveled, the risk of landslide would be extreme. The sandstone is fragile and unstable, and the ground very soft. Additionally, there would be almost no way to manage storm water and drainage. Pollutants from homes would concentrate as they flowed down the hill, and, once they reached the bay, they would not dilute in the ocean. Because of the railroad causeway, any pollutants that make it into the bay will accumulate. This has happened just through the emptying of Arroyo Creek, a stream that has almost no exposure to development, and yet has still resulted in heavy toxins in the bay.

For the sake of the safety of residents, the safety of the environment, and the personal and cultural significance of the land, I urge that the development of Chuckanut Bay be considered with extreme care and caution. At the very least, an Environmental Impact Statement is essential. Chuckanut Bay is important, perhaps not to most, but to many. That cannot be ignored.

Thank you for your consideration,

Serena Tyran
617 Arroyo Lane

Aven, Heather M.

From: Marjorie Varner <marjorie.varner@gmail.com>
Sent: Friday, April 5, 2024 8:06 PM
To: Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.
Subject: Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

Some people who received this message don't often get email from marjorie.varner@gmail.com. [Learn why this is important](#)

CAUTION: This message originated from outside of this organization. Please exercise caution with links and attachments.

Dear Ms. Bell, Mr. Sundin, and Mr. Lyon,

I am a resident of Edgemoor and live a few doors down from the Jones' property on Viewcrest Road. My section of Edgemoor is filled with magnificent mature Douglas Fir trees. It is a privilege to own property and live in this beautiful spot year-round.

I ask you to prevent harms to Bellingham's publicly-owned spaces connected to Mud Bay Cliffs, and to safeguard our community against known and severe subdivision development risks, by requiring an Environmental Impact Statement (EIS) be prepared for *The Woods at Viewcrest*, a proposed subdivision on the mature woodlands and wetlands of Mud Bay Cliffs.

The proposed subdivision (of 4 current lots into 38 proposed lots, with up to 152 housing units) would likely impose **significant adverse impacts to the environment**. In addition to these adverse impacts, the developer's application materials are flawed in substantive ways, which further exposes the public's interests, including public investments in neighboring fish and wildlife habitats, to considerable risk. The likely significant adverse impacts, coupled with the substantive application flaws, compel the city to issue a State Environmental Protection Act (SEPA) Determination of Significance and require an EIS.

A. Unique and Special Site. The location of the proposed subdivision is unique both in its **specific characteristics** and its **physical setting**. These unique characteristics and physical setting are important factors that influence why the current subdivision proposal is likely to have significant adverse environmental impacts. The site of this proposed subdivision is currently distinguished by these features:

Specific Characteristics

- **Important Habitat Hub.** The 2021 City of Bellingham *Wildlife Corridor Analysis* designates this property, which consists of rare mature shoreline woodlands and wetlands habitat, as an *Important Habitat Hub* – and one of the only *Important Habitat Hubs* in south Bellingham that remains unprotected. This area deserves protection especially in this time of heightened public awareness and sensitivity to our natural environment and the hazards presented by indiscriminate development.
- **Geohazards.** Significant landslide, erosion and seismic hazards exist throughout the site, and they are sensitive to development disturbances including hydrological changes.

- **Storm Microclimate.** This location is well-known locally for its microclimate of gales during storms – among the strongest gales in Bellingham. Gale intensity has been increasing over the past decade due to climate change. The existing mature woodland acts as a protective buffer for wildlife (both resident and sheltering), and for the community.

Physical Setting

- **Wildlife Network.** This *Important Habitat Hub* is the center part that links two other *Important Habitat Hubs* – Clark’s Point and Chuckanut Village Marsh/Chuckanut Bay Open Space – all of which are connected to a larger, protected *Wildlife Network*. The public has invested heavily to protect and maintain the Hubs and Corridors of this Wildlife Network.
- **Estuarine Wetlands.** Mud Bay Cliffs is a key watershed adjacent to Mud Bay’s Category I Estuarine Wetlands.
- **Stormwater.** Most drainage from this site flows directly into the Mud Bay Estuarine Wetlands. Drainage discharges from existing city stormwater outlets have already begun to impair the health of this wetland habitat.
- **Great Blue Herons.** The Post Point Colony of Great Blue Herons relies on this site for shelter, and on the Mud Bay Estuarine Wetlands to feed their young. This Heron Colony fled its previous home near Chuckanut Bay as a result of subdivision development activity. Significant public investment has been made to provide habitat protection for this Colony at its new Post Point nesting location.
- **Salmon.** Juvenile salmonids rely on clean water and safe passage through the Mud Bay Estuarine Wetlands, Chuckanut Village Marsh, and Chuckanut Creek. Significant public investment has been made to restore these habitats for salmon.
- **Traffic Safety and Level of Service.**
 - Traffic safety issues have been well documented on Edgemoor’s narrow, hilly roads with limited sightlines, including where Viewcrest Road intersects Chuckanut Drive (State Route 11). The traffic conditions where Fairhaven Middle School meets the 12th Street Bridge are particularly dangerous. These well-documented issues create precarious and unsafe conditions for walkers, runners, cyclists, and motorists. The city has been notified of these hazardous conditions but has yet to take any action to mitigate them.
 - Viewcrest Road and the roadways it intersects provide unique access to important public amenities. These amenities tend to have more visitors seasonally and on weekends. Viewcrest’s intersection with Chuckanut Drive is significant as an access point to public amenities including Clark’s Point, Hundred Acre Woods (trailhead at the intersection), and the Chuckanut Scenic Byway (which itself is the sole access to multiple public parklands, trail systems, and public natural amenities).

B. Severe Application Flaws. The proposed subdivision application is severely flawed. Objective and comprehensive assessments suitable to this unique site and setting must be completed to address these flaws before an informed consideration of any subdivision proposals can be made. For example:

- The Stormwater Management Plan is incomplete, lacking key required plan elements. As proposed, the subdivision would result in significant increases in runoff volumes, speeds, and sediment/pollution loads. Moreover, by discharging polluted stormwater into the Mud Bay Estuarine Wetlands, significant adverse environmental impacts are probable. The plan fails to address how the ecologically sensitive Mud Bay Estuarine Wetlands, and the Public Shoreline, will be impacted by this development.
- The Wildlife Habitat Assessment fails to: identify this site as an *Important Habitat Hub* connected to other nearby hubs by two Important Habitat Corridors; address the harmful wildlife *Habitat Network* fragmentation the proposed development would cause; address impacts to the Mud Bay Estuarine Wetlands and salmon habitat of Chuckanut Village Marsh and Chuckanut Creek; address impacts to the Post Point Heron Colony (feeding and sheltering); provide a sufficient wildlife inventory.
- The Geotechnical Investigation & Geohazard Report fails to assess the impact of development on groundwater flow and the likely increase in probability, frequency and magnitude of flooding, erosion, and landslide activity. It is documented that development activities would likely make the site hazardous for the subdivision residents, neighbors, and the community at large. These dangers would begin with development disturbances, and would persist for decades to come.
- There is no Hydrology assessment at all, which this unique site's characteristics and setting necessitate. A Hydrology report is essential to evaluate potential environmental impacts, and ensure that any development at this site will not harm local ecosystems and water quality. Clearly, development of infrastructure such as roads, retention walls, driveways, structures and other hardscaping will alter the topography and the flow of water on this geologically complex site. With soils disturbances and proposed infrastructure cutting across the site, it is probable that saturation, drainage, and flooding would be greatly affected. Erosion, rockfall, landslide and flooding to the north would be likely, unless plans are developed using Hydrology information. These likely impacts could severely affect neighboring public and private lands, waters, and wildlife habitat.
- I am extremely concerned about the loss of mature trees from the site. The applicant has failed to show how tree removal during both initial infrastructure development, and then later by lot owners, would impact the **mature woodland**. There is no assessment for how the gales from worsening storms, combined with extensive tree removal, would impact sheltering wildlife and public safety. There is no assessment of how the remaining trees in the proposed narrow 200-foot "buffer" along the shoreline would be affected by adjacent tree removal; it is probable that tree removal would degrade the health of nearby trees in the proposed "buffer" wildlife habitat connecting two Important Habitat Hubs.
- The Traffic Impact Analysis fails to address how Levels of Service to public parks, public natural amenities, and scenic byway would be impacted by traffic from this development. Further, it fails to address the known public safety issues which would be exacerbated by increased traffic from the 152 potential new housing units, since fourplexes would be allowed on all 38 lots under a new statewide law.

Because of this site's unique specific characteristics and unique physical setting, and because of the subdivision application's profound flaws, the city does not have the accurate, sufficient, and objective information it needs to identify and assess potential significant adverse impacts.

Moreover, the application materials themselves indicate that the proposal is likely to have a significant adverse impact on the natural environment, the built environment, and public health and safety.

I ask the city to protect our public interest and prevent harms to the community:

Require an Environmental Impact Statement, so that any permit decisions are based on a full understanding of the risks to the environment, and to public safety.

Sincerely,

Marjorie Varner

654 Clark Road, Bellingham WA 98225

Aven, Heather M.

From: noreply@cob.org on behalf of City of Bellingham <noreply@cob.org>
Sent: Friday, April 5, 2024 9:51 AM
To: G.Proj.Wood at Viewcrest
Subject: Public Comment -Matt Werner
Attachments: Public Comment - 654.pdf



City of Bellingham

Public Comment

Entry Details

NAME

Matt Werner

CHOOSE TOPIC

The Woods at Viewcrest

COMMENT OR TESTIMONY

I live in the Briza neighborhood and somewhat predictably by default was originally opposed to this development. That was until I was almost hit by a distracted driver that swerved onto the shoulder on Chuckanut Drive while running up to Viewcrest this morning. I also ride my bike to work in Fairhaven everyday and have to count my blessings when I survive the stretch of Chuckanut until I can get off at Fairhaven Park. I personally love the idea of a trail that can ultimately connect Sea Pines Road and Viewcrest so my active family and I no longer have to brave the traffic of Chuckanut as pedestrians and cyclists.

EMAIL

jemawerner@comcast.net

DATE

4/5/2024

Aven, Heather M.

From: good luck charm <bellwid@comcast.net>
Sent: Friday, April 5, 2024 2:44 PM
To: Bell, Kathy M.; Sundin, Steven C.; FN - bls@cob.org
Subject: Please require an EIS for Mud Bay Cliffs

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CAUTION: This message originated from outside of this organization. Please exercise caution with links and attachments.

Dear Kathy Bell, Steve Sundin, Blake Lyon,

From: Dr. Steve Widman

500 Bayside Rd

Bellingham WA 98225

April 5, 2024

Subject: Please Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

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Geohazards. Significant landslide, erosion and seismic hazards exist throughout the site, and they are sensitive to development disturbances including hydrological changes.

Storm Microclimate. This location is well-known locally for its microclimate of gales during storms – among the strongest gales in Bellingham. Gale intensity has been increasing over the past decade due to climate change. The existing mature woodland acts as a protective buffer for wildlife (both resident and sheltering), and for the community.

Physical Setting Wildlife Network. This *Important Habitat Hub* is the center part that links two other *Important Habitat Hubs* – Clark’s Point and Chuckanut Village Marsh/ Chuckanut Bay Open Space – all of which are connected to a larger, protected *Wildlife Network*. The public has invested heavily to protect and maintain the Hubs and Corridors of this Wildlife Network.

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Great Blue Herons. The Post Point Colony of Great Blue Herons relies on this site for shelter, and on the Mud Bay Estuarine Wetlands to feed their young. This Heron Colony fled its previous home near Chuckanut Bay as a result of subdivision development activity. Significant public investment has been made to provide habitat protection for this Colony at its new Post Point nesting location.

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.Traffic Safety and Level of Service. Traffic safety issues have been well documented on Edgemoor’s narrow, hilly roads with limited sightlines, including where Viewcrest Road intersects Chuckanut Drive (State Route 11). The traffic conditions where Fairhaven Middle School meets the 12th Street Bridge are particularly dangerous. These well-documented issues create precarious and unsafe conditions for walkers, runners, cyclists, and motorists. The city has been notified of these hazardous conditions but has yet to take any action to mitigate them. Viewcrest Road and the roadways it intersects provide unique access to important public amenities. These amenities tend to have more visitors seasonally and on weekends. Viewcrest’s intersection with Chuckanut Drive is significant as an access point to public amenities including Clark’s Point, Hundred Acre Woods (trailhead at the intersection), and the Chuckanut Scenic Byway (which itself is the sole access to multiple public parklands, trail systems, and public natural amenities).

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For example: The Stormwater Management Plan is incomplete, lacking key required plan elements. As proposed, the subdivision would result in significant increases in runoff volumes, speeds, and sediment/pollution loads. Moreover, by discharging polluted stormwater into the Mud Bay Estuarine Wetlands, significant adverse environmental impacts are probable. The plan fails to address how the

ecologically sensitive Mud Bay Estuarine Wetlands, and the Public Shoreline, will be impacted by this development.

The Wildlife Habitat Assessment fails to: identify this site as an *Important Habitat Hub* connected to other nearby hubs by *two Important Habitat Corridors*; address the harmful wildlife *Habitat Network* fragmentation the proposed development would cause; address impacts to the Mud Bay Estuarine Wetlands and salmon habitat of Chuckanut Village Marsh and Chuckanut Creek; address impacts to the Post Point Heron Colony (feeding and sheltering); provide a sufficient wildlife inventory.

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I ask the city to protect our public interest and prevent harms to the community:

Require an Environmental Impact Statement, so that any permit decisions are based on a full understanding of the risks to the environment, and to public safety.

I sincerely hope our concerns will be taken seriously as this is an entirely ridiculous proposal for development on these cliffs in light of all the awareness we now have of the deleterious effects to the entire ecosystem.

Respectfully,

Steve Widman

Aven, Heather M.

From: Laura Widman <hello@kindredbeings.com>
Sent: Friday, April 5, 2024 2:42 PM
To: Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.
Subject: Please REQUIRE an EIS for Proposed Subdivision on Mud Bay Cliffs

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Dear Kathy Bell, Steve Sundin, Blake Lyon,

From: Laura Widman

500 Bayside Rd

Bellingham WA 98225

April 5, 2024

Subject: Please Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

I ask you to prevent harms to Bellingham's publicly-owned spaces connected to Mud Bay Cliffs, and to safeguard our community against known and severe subdivision development risks, by requiring an Environmental Impact Statement (EIS) be prepared for *The Woods at Viewcrest*, a proposed subdivision on the mature woodlands and wetlands of Mud Bay Cliffs. The proposed subdivision (of 4 current lots into 38 proposed lots, with up to 152 housing units) would likely impose **significant adverse impacts to the environment**. In addition to these adverse impacts, the developer's application materials are flawed in substantive ways, which further exposes the public's interests, including public investments in neighboring fish and wildlife habitats, to considerable risk. The likely significant adverse impacts, coupled with the substantive application flaws, compel the city to issue a State Environmental Protection Act (SEPA) Determination of Significance and require an EIS.

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Laura Widman

Protect Mud Bay Cliffs

A Grassroots, Non-Profit Community Effort
Bellingham, WA 98225

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Information

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Aven, Heather M.

From: good luck charm <bellwid@comcast.net>
Sent: Friday, April 5, 2024 2:48 PM
To: Bell, Kathy M.; Sundin, Steven C.; FN - bls@cob.org
Subject: please require EIS for Mud Bay Cliffs

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From: Claire Widman

500 Bayside Rd

Bellingham WA 98225

April 5, 2024

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.Traffic Safety and Level of Service. Traffic safety issues have been well documented on Edgemoor’s narrow, hilly roads with limited sightlines, including where Viewcrest Road intersects Chuckanut Drive (State Route 11). The traffic conditions where Fairhaven Middle School meets the 12th Street Bridge are particularly dangerous. These well-documented issues create precarious and unsafe conditions for walkers, runners, cyclists, and motorists. The city has been notified of these hazardous conditions but has yet to take any action to mitigate them. Viewcrest Road and the roadways it intersects provide unique access to important public amenities. These amenities tend to have more visitors seasonally and on weekends. Viewcrest’s intersection with Chuckanut Drive is significant as an access point to public amenities including Clark’s Point, Hundred Acre Woods (trailhead at the intersection), and the Chuckanut Scenic Byway (which itself is the sole access to multiple public parklands, trail systems, and public natural amenities).

B. Severe Application Flaws. The proposed subdivision application is severely flawed. Objective and comprehensive assessments suitable to this unique site and setting must be completed to address these flaws before an informed consideration of any subdivision proposals can be made.

For example: The Stormwater Management Plan is incomplete, lacking key required plan elements. As proposed, the subdivision would result in significant increases in runoff volumes, speeds, and sediment/pollution loads. Moreover, by discharging polluted stormwater into the Mud Bay Estuarine

Wetlands, significant adverse environmental impacts are probable. The plan fails to address how the ecologically sensitive Mud Bay Estuarine Wetlands, and the Public Shoreline, will be impacted by this development.

The Wildlife Habitat Assessment fails to: identify this site as an *Important Habitat Hub* connected to other nearby hubs by two Important Habitat Corridors; address the harmful wildlife *Habitat Network* fragmentation the proposed development would cause; address impacts to the Mud Bay Estuarine Wetlands and salmon habitat of Chuckanut Village Marsh and Chuckanut Creek; address impacts to the Post Point Heron Colony (feeding and sheltering); provide a sufficient wildlife inventory.

The Geotechnical Investigation & Geohazard Report fails to assess the impact of development on groundwater flow and the likely increase in probability, frequency and magnitude of flooding, erosion, and landslide activity. It is documented that development activities would likely make the site hazardous for the subdivision residents, neighbors, and the community at large. These dangers would begin with development disturbances, and would persist for decades to come.

There is no Hydrology assessment at all, which this unique site's characteristics and setting necessitate. A Hydrology report is essential to evaluate potential environmental impacts, and ensure that any development at this site will not harm local ecosystems and water quality. Clearly, development of infrastructure such as roads, retention walls, driveways, structures and other hardscaping will alter the topography and the flow of water on this geologically complex site. With soils disturbances and proposed infrastructure cutting across the site, it is probable that saturation, drainage, and flooding would be greatly affected. Erosion, rockfall, landslide and flooding to the north would be likely, unless plans are developed using Hydrology information. These likely impacts could severely affect neighboring public and private lands, waters, and wildlife habitat. The applicant has failed to show how tree removal during both initial infrastructure development, and then later by lot owners, would impact the **mature woodland**. There is no assessment for how the gales from worsening storms, combined with extensive tree removal, would impact sheltering wildlife and public safety. There is no assessment of how the remaining trees in the proposed narrow 200-foot "buffer" along the shoreline would be affected by adjacent tree removal; it is probable that tree removal would degrade the health of nearby trees in the proposed "buffer" wildlife habitat connecting two Important Habitat Hubs.

The Traffic Impact Analysis fails to address how Levels of Service to public parks, public natural amenities, and scenic byway would be impacted by traffic from this development. Further, it fails to address the known public safety issues which would be exacerbated by increased traffic from the 152 potential new housing units, since fourplexes would be allowed on all 38 lots under a new statewide law. Because of this site's unique specific characteristics and unique physical setting, and because of the subdivision application's profound flaws, the city does not have the accurate, sufficient, and objective information it needs to identify and assess potential significant adverse impacts. Moreover, the application materials themselves indicate that the proposal is likely to have a significant adverse impact on the natural environment, the built environment, and public health and safety.

I ask the city to protect our public interest and prevent harms to the community:

Require an Environmental Impact Statement, so that any permit decisions are based on a full understanding of the risks to the environment, and to public safety.

I sincerely hope our concerns will be taken seriously as this is an entirely ridiculous proposal for development on these cliffs in light of all the awareness we now have of the deleterious effects to the entire ecosystem.

Respectfully,

Claire Widman

Aven, Heather M.

From: Nancy <schillingn217@gmail.com>
Sent: Saturday, April 6, 2024 8:08 AM
To: Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.
Subject: Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

Some people who received this message don't often get email from schillingn217@gmail.com. [Learn why this is important](#)

CAUTION: This message originated from outside of this organization. Please exercise caution with links and attachments.

From: Nancy Schilling, 2816 Lyle St, Bellingham

April 6, 2024

Subject: Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

Dear Ms. Bell, Mr. Sundin, and Mr. Lyon,

I'm sure you've received a lot of cut and paste letters and I was going to cut this down to a more manageable size, but the more I read, the more I felt it's all important.

I ask you to prevent harms to Bellingham's publicly-owned spaces connected to Mud Bay Cliffs, and to safeguard our community against known and severe subdivision development risks, by requiring an Environmental Impact Statement (EIS) be prepared for The Woods at Viewcrest, a proposed subdivision on the mature woodlands and wetlands of Mud Bay Cliffs.

The proposed subdivision (of 4 current lots into 38 proposed lots, with up to 152 housing units) would likely impose significant adverse impacts to the environment. In addition to these adverse impacts, the developer's application materials are flawed in substantive ways, which further exposes the public's interests, including public investments in neighboring fish and wildlife habitats, to considerable risk. The likely significant adverse impacts, coupled with the substantive application flaws, compel the city to issue a State Environmental Protection Act (SEPA) Determination of Significance and require an EIS.

A. Unique and Special Site. The location of the proposed subdivision is unique both in its specific characteristics and its physical setting. These unique characteristics and physical setting are important factors that influence why the current subdivision proposal is likely to have significant adverse environmental impacts. The site of this proposed subdivision is currently distinguished by these features:

Specific Characteristics

- **Important Habitat Hub.** The 2021 City of Bellingham Wildlife Corridor Analysis designates this property, which consists of rare mature shoreline woodlands and wetlands habitat, as an Important Habitat Hub – and one of the only Important Habitat Hubs in south Bellingham that remains unprotected.
- **Geohazards.** Significant landslide, erosion and seismic hazards exist throughout the site, and they are sensitive to development disturbances including hydrological changes.

- Storm Microclimate. This location is well-known locally for its microclimate of gales during storms – among the strongest gales in Bellingham. Gale intensity has been increasing over the past decade due to climate change. The existing mature woodland acts as a protective buffer for wildlife (both resident and sheltering), and for the community.

Physical Setting

- Wildlife Network. This Important Habitat Hub is the center part that links two other Important Habitat Hubs – Clark’s Point and Chuckanut Village Marsh/ Chuckanut Bay Open Space – all of which are connected to a larger, protected Wildlife Network. The public has invested heavily to protect and maintain the Hubs and Corridors of this Wildlife Network.
- Estuarine Wetlands. Mud Bay Cliffs is a key watershed adjacent to Mud Bay’s Category I Estuarine Wetlands.
- Stormwater. Most drainage from this site flows directly into the Mud Bay Estuarine Wetlands. Drainage discharges from existing city stormwater outlets have already begun to impair the health of this wetland habitat.
- Great Blue Herons. The Post Point Colony of Great Blue Herons relies on this site for shelter, and on the Mud Bay Estuarine Wetlands to feed their young. This Heron Colony fled its previous home near Chuckanut Bay as a result of subdivision development activity. Significant public investment has been made to provide habitat protection for this Colony at its new Post Point nesting location.
- Salmon. Juvenile salmonids rely on clean water and safe passage through the Mud Bay Estuarine Wetlands, Chuckanut Village Marsh, and Chuckanut Creek. Significant public investment has been made to restore these habitats for salmon.
- Traffic Safety and Level of Service.
 - Traffic safety issues have been well documented on Edgemoor’s narrow, hilly roads with limited sightlines, including where Viewcrest Road intersects Chuckanut Drive (State Route 11). The traffic conditions where Fairhaven Middle School meets the 12th Street Bridge are particularly dangerous. These well-documented issues create precarious and unsafe conditions for walkers, runners, cyclists, and motorists. The city has been notified of these hazardous conditions but has yet to take any action to mitigate them.
 - Viewcrest Road and the roadways it intersects provide unique access to important public amenities. These amenities tend to have more visitors seasonally and on weekends. Viewcrest’s intersection with Chuckanut Drive is significant as an access point to public amenities including Clark’s Point, Hundred Acre Woods (trailhead at the intersection), and the Chuckanut Scenic Byway (which itself is the sole access to multiple public parklands, trail systems, and public natural amenities).

B. Severe Application Flaws. The proposed subdivision application is severely flawed. Objective and comprehensive assessments suitable to this unique site and setting must be completed to address these flaws before an informed consideration of any subdivision proposals can be made. For example:

- The Stormwater Management Plan is incomplete, lacking key required plan elements. As proposed, the subdivision would result in significant increases in runoff volumes, speeds, and sediment/pollution loads. Moreover, by discharging polluted stormwater into the Mud Bay Estuarine Wetlands, significant adverse environmental impacts are probable. The plan fails to

address how the ecologically sensitive Mud Bay Estuarine Wetlands, and the Public Shoreline, will be impacted by this development.

- The Wildlife Habitat Assessment fails to: identify this site as an Important Habitat Hub connected to other nearby hubs by two Important Habitat Corridors; address the harmful wildlife Habitat Network fragmentation the proposed development would cause; address impacts to the Mud Bay Estuarine Wetlands and salmon habitat of Chuckanut Village Marsh and Chuckanut Creek; address impacts to the Post Point Heron Colony (feeding and sheltering); provide a sufficient wildlife inventory.
- The Geotechnical Investigation & Geohazard Report fails to assess the impact of development on groundwater flow and the likely increase in probability, frequency and magnitude of flooding, erosion, and landslide activity. It is documented that development activities would likely make the site hazardous for the subdivision residents, neighbors, and the community at large. These dangers would begin with development disturbances, and would persist for decades to come.
- There is no Hydrology assessment at all, which this unique site's characteristics and setting necessitate. A Hydrology report is essential to evaluate potential environmental impacts, and ensure that any development at this site will not harm local ecosystems and water quality. Clearly, development of infrastructure such as roads, retention walls, driveways, structures and other hardscaping will alter the topography and the flow of water on this geologically complex site. With soils disturbances and proposed infrastructure cutting across the site, it is probable that saturation, drainage, and flooding would be greatly affected. Erosion, rockfall, landslide and flooding to the north would be likely, unless plans are developed using Hydrology information. These likely impacts could severely affect neighboring public and private lands, waters, and wildlife habitat.
- The applicant has failed to show how tree removal during both initial infrastructure development, and then later by lot owners, would impact the mature woodland. There is no assessment for how the gales from worsening storms, combined with extensive tree removal, would impact sheltering wildlife and public safety. There is no assessment of how the remaining trees in the proposed narrow 200-foot "buffer" along the shoreline would be affected by adjacent tree removal; it is probable that tree removal would degrade the health of nearby trees in the proposed "buffer" wildlife habitat connecting two Important Habitat Hubs.
- The Traffic Impact Analysis fails to address how Levels of Service to public parks, public natural amenities, and scenic byway would be impacted by traffic from this development. Further, it fails to address the known public safety issues which would be exacerbated by increased traffic from the 152 potential new housing units, since fourplexes would be allowed on all 38 lots under a new statewide law.

Because of this site's unique specific characteristics and unique physical setting, and because of the subdivision application's profound flaws, the city does not have the accurate, sufficient, and objective information it needs to identify and assess potential significant adverse impacts.

Moreover, the application materials themselves indicate that the proposal is likely to have a significant adverse impact on the natural environment, the built environment, and public health and safety.

I ask the city to protect our public interest and prevent harms to the community:

Require an Environmental Impact Statement, so that any permit decisions are based on a full understanding of the risks to the environment, and to public safety.

Sincerely,

Aven, Heather M.

From: Lori Rubens <LVANRUBENS@COMCAST.NET>
Sent: Saturday, April 6, 2024 7:13 PM
To: Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.
Subject: The City needs to require an EIS for the Woods at Viewcrest (aka Mud Bay Cliffs Subdivision)

You don't often get email from lvanrubens@comcast.net. [Learn why this is important](#)

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To: Kathy Bell, Senior Planner, kbell@cob.org

Steve Sundin, Senior Planner, ssundin@cob.org

Blake Lyon, Planning & Community Development Department Director, bglyon@cob.org

Planning & Community Development Department

210 Lottie Street

Bellingham, WA 98225

From: Lori V Rubens, MD

621 Linden Rd

Bellingham WA 98225

Lvanrubens@comcast.net

Subject: Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

Dear Ms. Bell, Mr. Sundin, and Mr. Lyon,

I am a resident of Edgemoor, a long time visitor to Chuckanut Bay and Mud Bay, and am soon to be graduated as a Salish Sea Steward. I am writing to the Planning Department to request that the city require an independent Environmental Impact Statement in

consideration of the many potential harms that may result from the proposed subdivision.

The proposed subdivision (of 4 current lots into 38 proposed lots, with up to 152 housing units) would likely impose **significant adverse impacts to the environment**. In addition to these adverse impacts, the developer's application materials are flawed in substantive ways, which further exposes the public's interests, including public investments in neighboring fish and wildlife habitats, to considerable risk. The likely significant adverse impacts, coupled with the substantive application flaws, compel the city to issue a State Environmental Protection Act (SEPA) Determination of Significance and require an EIS.

A. Unique and Special Site. The location of the proposed subdivision is unique both in its **specific characteristics** and its **physical setting**. These unique characteristics and physical setting are important factors that influence why the current subdivision proposal is likely to have significant adverse environmental impacts. The site of this proposed subdivision is currently distinguished by these features:

Specific Characteristics

- **Important Habitat Hub.** The 2021 City of Bellingham *Wildlife Corridor Analysis* designates this property, which consists of rare mature shoreline woodlands and wetlands habitat, as an *Important Habitat Hub* – and one of the only *Important Habitat Hubs* in south Bellingham that remains unprotected.
- **Geohazards.** Significant landslide, erosion and seismic hazards exist throughout the site, and they are sensitive to development disturbances including hydrological changes.
- **Storm Microclimate.** This location is well-known locally for its microclimate of gales during storms – among the strongest gales in Bellingham. Gale intensity has been increasing over the past decade due to climate change. The existing mature woodland acts as a protective buffer for wildlife (both resident and sheltering), and for the community.

Physical Setting

- **Wildlife Network.** This *Important Habitat Hub* is the center part that links two other *Important Habitat Hubs* – Clark's Point and Chuckanut Village Marsh/ Chuckanut Bay Open Space – all of which are connected to a larger, protected *Wildlife Network*. The public has invested heavily to protect and maintain the Hubs and Corridors of this Wildlife Network.

- **Estuarine Wetlands and Northeast Chuckanut Bay.** Mud Bay Cliffs is a key watershed adjacent to Mud Bay's Category I Estuarine Wetlands. The City describes Northeast Chuckanut Bay as "Bellingham's richest and most biologically diverse estuary." It is home to many benthic invertebrates which are an important food supply for wintering Surf Scoters and other seabirds as well as for Great Blue Herons on a year round basis.
- **Chuckanut Bay, including Chuckanut Island and Chuckanut Rocks.** The bay, immediately south of Mud Bay, is home to a large number of seals, seabirds, Bald Eagles, forage fish, and invertebrates. It is an ecologically stunning area. Pollution emanating from Mud Bay makes its way into Chuckanut Bay and affects the health of this vital ecosystem.
- **Stormwater.** Most drainage from this site flows directly into the Mud Bay Estuarine Wetlands. Drainage discharges from existing city stormwater outlets have already begun to impair the health of this wetland habitat.
- **Great Blue Herons.** The Post Point Colony of Great Blue Herons relies on this site for shelter, and on the Mud Bay Estuarine Wetlands to feed their young. This Heron Colony fled its previous home near Chuckanut Bay as a result of subdivision development activity. Significant public investment has been made to provide habitat protection for this Colony at its new Post Point nesting location.
- **Salmon.** Juvenile salmonids rely on clean water and safe passage through the Mud Bay Estuarine Wetlands, Chuckanut Village Marsh, and Chuckanut Creek. Significant public investment has been made to restore these habitats for salmon.
- **Traffic Safety and Level of Service.**
 - Traffic safety issues have been well documented on Edgemoor's narrow, hilly roads with limited sightlines, including where Viewcrest Road intersects Chuckanut Drive (State Route 11). The traffic conditions where Fairhaven Middle School meets the 12th Street Bridge are particularly dangerous. These well-documented issues create precarious and unsafe conditions for walkers, runners, cyclists, and motorists. The city has been notified of these hazardous conditions but has yet to take any action to mitigate them.
 - Viewcrest Road and the roadways it intersects provide unique access to important public amenities. These amenities tend to have more visitors seasonally and on weekends. Viewcrest's intersection with Chuckanut Drive is significant as an access point to public amenities including Clark's Point, Hundred Acre Woods (trailhead at the intersection), and the Chuckanut Scenic Byway (which itself is the sole access to multiple public parklands, trail systems, and public natural amenities).

B. Severe Application Flaws. The proposed subdivision application is severely flawed. Objective and comprehensive assessments suitable to this unique site and setting must be completed to address these flaws before an informed consideration of any subdivision proposals can be made. For example:

- The Stormwater Management Plan is incomplete, lacking key required plan elements. As proposed, the subdivision would result in significant increases in runoff volumes, speeds, and sediment/pollution loads. Moreover, by discharging polluted stormwater into the Mud Bay Estuarine Wetlands, significant adverse environmental impacts are probable. Specifically, pesticides, insecticides, tire toxins (6PPD-q), and excess nitrogen and phosphates degrade water quality and impair the health of plant and animal life of the Bay. The plan fails to address how the ecologically sensitive Mud Bay Estuarine Wetlands, and the Public Shoreline, will be impacted by this development.
- The Wildlife Habitat Assessment fails to: identify this site as an *Important Habitat Hub* connected to other nearby hubs by two Important Habitat Corridors; address the harmful wildlife *Habitat Network* fragmentation the proposed development would cause; address impacts to the Mud Bay Estuarine Wetlands and salmon habitat of Chuckanut Village Marsh and Chuckanut Creek; address impacts to the Post Point Heron Colony (feeding and sheltering); provide a sufficient wildlife inventory.
- The Geotechnical Investigation & Geohazard Report fails to assess the impact of development on groundwater flow and the likely increase in probability, frequency and magnitude of flooding, erosion, and landslide activity. It is documented that development activities would likely make the site hazardous for the subdivision residents, neighbors, and the community at large. These dangers would begin with development disturbances, and would persist for decades to come.
- There is no Hydrology assessment at all, which this unique site's characteristics and setting necessitate. A Hydrology report is essential to evaluate potential environmental impacts, and ensure that any development at this site will not harm local ecosystems and water quality. Clearly, development of infrastructure such as roads, retention walls, driveways, structures and other hardscaping will alter the topography and the flow of water on this geologically complex site. With soils disturbances and proposed infrastructure cutting across the site, it is probable that saturation, drainage, and flooding would be greatly affected. Erosion, rockfall, landslide and flooding to the north would be likely, unless plans are developed using Hydrology information. These likely impacts could severely affect neighboring public and private lands, waters, and wildlife habitat.

- The applicant has failed to show how tree removal during both initial infrastructure development, and then later by lot owners, would impact the **mature woodland**. There is no assessment for how the gales from worsening storms, combined with extensive tree removal, would impact sheltering wildlife and public safety. There is no assessment of how the remaining trees in the proposed narrow 200-foot “buffer” along the shoreline would be affected by adjacent tree removal; it is probable that tree removal would degrade the health of nearby trees in the proposed “buffer” wildlife habitat connecting two Important Habitat Hubs.
- The Traffic Impact Analysis fails to address how Levels of Service to public parks, public natural amenities, and scenic byway would be impacted by traffic from this development. Further, it fails to address the known public safety issues which would be exacerbated by increased traffic from the 152 potential new housing units, since fourplexes would be allowed on all 38 lots under a new statewide law.

Because of this site’s unique specific characteristics and unique physical setting, and because of the subdivision application’s profound flaws, the city does not have the accurate, sufficient, and objective information it needs to identify and assess potential significant adverse impacts.

Moreover, the application materials themselves indicate that the proposal is likely to have a significant adverse impact on the natural environment, the built environment, and public health and safety.

I ask the city to protect our public interest and prevent harms to the community:

Require an Environmental Impact Statement, so that any permit decisions are based on a full understanding of the risks to the environment, and to public safety.

Sincerely,

Lori V Rubens, MD

Aven, Heather M.

From: Durand Stieger <dstieger@comcast.net>
Sent: Saturday, April 6, 2024 11:46 PM
To: Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.
Subject: Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

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Dear Ms. Bell, Mr. Sundin, and Mr. Lyon,

I ask you to prevent harms to Bellingham's publicly-owned spaces connected to Mud Bay Cliffs, and to safeguard our community against known and severe subdivision development risks, by requiring an Environmental Impact Statement (EIS) be prepared for The Woods at Viewcrest, a proposed subdivision on the mature woodlands and wetlands of Mud Bay Cliffs.

The proposed subdivision (of 4 current lots into 38 proposed lots, with up to 152 housing units) would likely impose significant adverse impacts to the environment. In addition to these adverse impacts, the developer's application materials are flawed in substantive ways, which further exposes the public's interests, including public investments in neighboring fish and wildlife habitats, to considerable risk. The likely significant adverse impacts, coupled with the substantive application flaws, compel the city to issue a State Environmental Protection Act (SEPA) Determination of Significance and require an EIS.

The location of the proposed subdivision is unique both in its specific characteristics and its physical setting. These unique characteristics and physical setting are important factors that influence why the current subdivision proposal is likely to have significant adverse environmental impacts.

The proposed subdivision application is severely flawed. Objective and comprehensive assessments suitable to this unique site and setting must be completed to address these flaws before an informed consideration of any subdivision proposals can be made.

Because of this site's unique specific characteristics and unique physical setting, and because of the subdivision application's profound flaws, the city does not have the accurate, sufficient, and objective information it needs to identify and assess potential significant adverse impacts.

Moreover, the application materials themselves indicate that the proposal is likely to have a significant adverse impact on the natural environment, the built environment, and public health and safety.

I ask the city to protect our public interest and prevent harms to the community. Please require an Environmental Impact Statement, so that any permit decisions are based on a full understanding of the risks to the environment and to public safety.

Sincerely,

Durand Stieger
223 E Bakerview Rd, Apt 404
Bellingham, WA 98226

dstieger@comcast.net

Aven, Heather M.

From: Dan Burns <danburns3622@gmail.com>
Sent: Sunday, April 7, 2024 11:16 AM
To: Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.
Subject: Proposed Subdivision on Mud Bay Cliffs

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Dear Ms. Bell, Mr. Sundin,

I ask that you review the Bellingham's publicly-owned spaces connected to Mud Bay Cliffs, and to safeguard our community against subdivision development risks. This can be facilitated by requiring an Environmental Impact Statement (EIS) be prepared for *The Woods at Viewcrest*, a proposed subdivision on the mature woodlands and wetlands of Mud Bay Cliffs. The proposed subdivision (of 4 current lots into 38 proposed lots, with up to 152 housing units) would likely impose **significant adverse impacts to the environment**. In addition to these adverse impacts, the developer's application materials are flawed in substantive ways, which further exposes the public's interests, including public investments in neighboring fish and wildlife habitats, to considerable risk. The likely significant adverse impacts, coupled with the substantive application flaws, compel the city to issue a State Environmental Protection Act (SEPA) Determination of Significance and require an EIS.

The location of the proposed subdivision is unique both in its **specific characteristics** and its **physical setting**. These unique characteristics and physical setting are important factors that influence why the current subdivision proposal is likely to have significant adverse environmental impacts. The ways in which Mud flats would be affected include :

- **Wildlife Network.** This *Important Habitat Hub* is the center part that links two other *Important Habitat Hubs* – Clark's Point and Chuckanut Village Marsh/ Chuckanut Bay Open Space – all of which are connected to a larger, protected *Wildlife Network*. The public has invested heavily to protect and maintain the Hubs and Corridors of this Wildlife Network.

- **Estuarine Wetlands.** Mud Bay Cliffs is a key watershed adjacent to Mud Bay's Category I Estuarine Wetlands.
- **Stormwater.** Most drainage from this site flows directly into the Mud Bay Estuarine Wetlands. Drainage discharges from existing city stormwater outlets have already begun to impair the health of this wetland habitat.
- **Great Blue Herons.** The Post Point Colony of Great Blue Herons relies on this site for shelter, and on the Mud Bay Estuarine Wetlands to feed their young. This Heron Colony fled its previous home near Chuckanut Bay as a result of subdivision development activity. Significant public investment has been made to provide habitat protection for this Colony at its new Post Point nesting location.
- **Salmon.** Juvenile salmonids rely on clean water and safe passage through the Mud Bay Estuarine Wetlands, Chuckanut Village Marsh, and Chuckanut Creek. Significant public investment has been made to restore these habitats for salmon.

The current application fails to take into account the above issues accurately.. The application needs to fully address the stormwater management effects. The impact on the wildlife habitat corridor it alters permanently.

Because of this site's unique specific characteristics and unique physical setting, and because of the subdivision application's profound flaws, the city does not have the accurate, sufficient, and objective information it needs to identify and assess potential significant adverse impacts.

Moreover, the application materials themselves indicate that the proposal is likely to have a significant adverse impact on the natural environment, the built environment, and public health and safety.

In Bellingham, WA

Dan Burns

Aven, Heather M.

From: Courtney V Harris <courtneyvharris@gmail.com>
Sent: Sunday, April 7, 2024 9:14 PM
To: Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.
Subject: Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

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CAUTION: This message originated from outside of this organization. Please exercise caution with links and attachments.

April 7, 2024

Dear Ms. Bell, Mr. Sundin, and Mr. Lyon,

Firstly, let me introduce myself. I am a current Bellingham resident, school district and small business employee, home owner, and community member. I have lived and worked in Bellingham since 2021, as well as during the years 2004-2008. The other 31 years of my life, I was also a Washington State resident, residing and working in King County.

Through the course of my life, I have experienced first hand the population growth of PNW Washington and the way that growth has negatively impacted many of the region's former green spaces, farmlands, and rural areas. It is hard to bear sometimes; Once these spaces are developed, there is basically no going back. I believe it is my civic duty to steward and advocate for the wild spaces that remain, especially those that serve as corridors for our local wildlife, such as Mud Blay Flats.

I ask you to prevent harms to Bellingham's publicly-owned spaces connected to Mud Bay Cliffs, and to safeguard our community against known and severe subdivision development risks, by requiring an Environmental Impact Statement (EIS) be prepared for The Woods at Viewcrest, a proposed subdivision on the mature woodlands and wetlands of Mud Bay Cliffs.

The proposed subdivision (of 4 current lots into 38 proposed lots, with up to 152 housing units) would likely impose significant adverse impacts to the environment. In addition to these adverse impacts, the developer's application materials are flawed in substantive ways, which further exposes the public's interests, including public investments in neighboring fish and wildlife habitats, to considerable risk. The likely significant adverse impacts, coupled with the substantive application flaws, compel the city to issue a State Environmental Protection Act (SEPA) Determination of Significance and require an EIS.

A. Unique and Special Site. The location of the proposed subdivision is unique both in its specific characteristics and its physical setting. These unique characteristics and physical setting are important factors that influence why the current subdivision proposal is likely to have significant adverse environmental impacts. The site of this proposed subdivision is currently distinguished by these features:

Specific Characteristics

Important Habitat Hub. The 2021 City of Bellingham Wildlife Corridor Analysis designates this property, which consists of rare mature shoreline woodlands and wetlands habitat, as an Important Habitat Hub – and one of the only Important Habitat Hubs in south Bellingham that remains unprotected.

Geohazards. Significant landslide, erosion and seismic hazards exist throughout the site, and they are sensitive to development disturbances including hydrological changes.

Storm Microclimate. This location is well-known locally for its microclimate of gales during storms – among the strongest gales in Bellingham. Gale intensity has been increasing over the past decade due to climate change. The existing mature woodland acts as a protective buffer for wildlife (both resident and sheltering), and for the community.

Physical Setting

Wildlife Network. This Important Habitat Hub is the center part that links two other Important Habitat Hubs – Clark’s Point and Chuckanut Village Marsh/ Chuckanut Bay Open Space – all of which are connected to a larger, protected Wildlife Network. The public has invested heavily to protect and maintain the Hubs and Corridors of this Wildlife Network.

Estuarine Wetlands. Mud Bay Cliffs is a key watershed adjacent to Mud Bay’s Category I Estuarine Wetlands.

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Salmon. Juvenile salmonids rely on clean water and safe passage through the Mud Bay Estuarine Wetlands, Chuckanut Village Marsh, and Chuckanut Creek. Significant public investment has been made to restore these habitats for salmon.

Traffic Safety and Level of Service.

Traffic safety issues have been well documented on Edgemoor’s narrow, hilly roads with limited sightlines, including where Viewcrest Road intersects Chuckanut Drive (State Route 11). The traffic conditions where Fairhaven Middle School meets the 12th Street Bridge are particularly dangerous. These well-documented issues create precarious and unsafe conditions for walkers, runners, cyclists, and motorists. The city has been notified of these hazardous conditions but has yet to take any action to mitigate them.

Viewcrest Road and the roadways it intersects provide unique access to important public amenities. These amenities tend to have more visitors seasonally and on weekends. Viewcrest’s intersection with Chuckanut Drive is significant as an access point to public amenities including Clark’s Point, Hundred

Acre Woods (trailhead at the intersection), and the Chuckanut Scenic Byway (which itself is the sole access to multiple public parklands, trail systems, and public natural amenities).

B. Severe Application Flaws. The proposed subdivision application is severely flawed. Objective and comprehensive assessments suitable to this unique site and setting must be completed to address these flaws before an informed consideration of any subdivision proposals can be made. For example:

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There is no Hydrology assessment at all, which this unique site's characteristics and setting necessitate. A Hydrology report is essential to evaluate potential environmental impacts, and ensure that any development at this site will not harm local ecosystems and water quality. Clearly, development of infrastructure such as roads, retention walls, driveways, structures and other hardscaping will alter the topography and the flow of water on this geologically complex site. With soils disturbances and proposed infrastructure cutting across the site, it is probable that saturation, drainage, and flooding would be greatly affected. Erosion, rockfall, landslide and flooding to the north would be likely, unless plans are developed using Hydrology information. These likely impacts could severely affect neighboring public and private lands, waters, and wildlife habitat.

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potential new housing units, since fourplexes would be allowed on all 38 lots under a new statewide law.

Because of this site's unique specific characteristics and unique physical setting, and because of the subdivision application's profound flaws, the city does not have the accurate, sufficient, and objective information it needs to identify and assess potential significant adverse impacts.

Moreover, the application materials themselves indicate that the proposal is likely to have a significant adverse impact on the natural environment, the built environment, and public health and safety.

I ask the city to protect our public interest and prevent harms to the community:

Require an Environmental Impact Statement, so that any permit decisions are based on a full understanding of the risks to the environment, and to public safety.

Sincerely,

Courtney Harris
Bellingham, WA

Aven, Heather M.

From: Courtney V Harris <courtneyvharris@gmail.com>
Sent: Sunday, April 7, 2024 9:20 PM
To: Bell, Kathy M.
Subject: Woods at Viewcrest

You don't often get email from courtneyvharris@gmail.com. [Learn why this is important](#)

CAUTION: This message originated from outside of this organization. Please exercise caution with links and attachments.

Please accept this email as my request to receive via email all notices regarding the Woods at Viewcrest applications.

Thank you,
Courtney Harris

Aven, Heather M.

From: Lesley Rigg <lesleyrigg@bellcoho.com>
Sent: Sunday, April 7, 2024 10:14 AM
To: Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.
Subject: Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

Some people who received this message don't often get email from lesleyrigg@bellcoho.com. [Learn why this is important](#)

CAUTION: This message originated from outside of this organization. Please exercise caution with links and attachments.

Dear Ms. Bell, Mr. Sundin, and Mr. Lyon,

I ask you to prevent harms to Bellingham's publicly-owned spaces connected to Mud Bay Cliffs, and to safeguard our community against known and severe subdivision development risks, by requiring an Environmental Impact Statement (EIS) be prepared for *The Woods at Viewcrest*, a proposed subdivision on the mature woodlands and wetlands of Mud Bay Cliffs.

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Thank you for your work on this.

Lesley Rigg

2676 Donovan Ave

Bellingham WA 98225-7624

Aven, Heather M.

From: Janet Higbee-Robinson <jhhigbeerobinson@gmail.com>
Sent: Sunday, April 7, 2024 7:21 PM
To: Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.
Subject: Require an EIS for the proposed subdivision on Mud Bay Cliffs

Some people who received this message don't often get email from jhhigbeerobinson@gmail.com. [Learn why this is important](#)

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Dear Ms. Bell, Mr. Sundin, and Mr. Lyon,

Thank you for all you do for our community.

I am in full agreement with the letter compiled by PROTECT MUD BAY CLIFFS, so I send it on to you. Please use your position to protect the wildlife network, the estuarine habitat, the mature stand of trees and the unique sandstone outcrop present at Mud Bay. Instead of developing this area, let us restore it so that future generations may enjoy its grandeur and splendor. Allow children to play in a relatively clean area where birds and clams thrive. Provide a place for marine biology students to study. Offer our community a place of tranquility,

I ask you to prevent harms to Bellingham's publicly-owned spaces connected to Mud Bay Cliffs, and to safeguard our community against known and severe subdivision development risks, by requiring an Environmental Impact Statement (EIS) be prepared for *The Woods at Viewcrest*, a proposed subdivision on the mature woodlands and wetlands of Mud Bay Cliffs.

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Sincerely,

Janet Higbee-Robinson

2078 Wildflower Way

Bellingham, WA 98229

Previous

Next

Aven, Heather M.

From: William Beer <William_Beer2003@yahoo.com>
Sent: Monday, April 8, 2024 11:10 AM
To: Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.
Cc: Larry Horowitz
Subject: Woods at Viewcrest PUBLIC COMMENT

You don't often get email from william_beer2003@yahoo.com. [Learn why this is important](#)

CAUTION: This message originated from outside of this organization. Please exercise caution with links and attachments.

To: Kathy Bell, Senior Planner, kbell@cob.org

Steve Sundin, Senior Planner, ssundin@cob.org

Blake Lyon, Planning & Community Development Department Director, bglyon@cob.org

Planning & Community Development Department

210 Lottie Street

Bellingham, WA 98225

From: William H Beer

505 Bayside Road
Bellingham 98225

April 8, 2024

Subject: Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

Dear Ms. Bell, Mr. Sundin, and Mr. Lyon,

I ask you to prevent harms to Bellingham's publicly-owned spaces connected to Mud Bay Cliffs, and to safeguard our community against known and severe subdivision development risks, by requiring an Environmental Impact Statement (EIS) be prepared for *The Woods at Viewcrest*, a proposed subdivision on the mature woodlands and wetlands of Mud Bay Cliffs.

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Sincerely,

William Beer

Aven, Heather M.

From: Lauren Fritzen <laurenfritzen@gmail.com>
Sent: Monday, April 8, 2024 12:03 PM
To: Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.
Subject: Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

Some people who received this message don't often get email from laurenfritzen@gmail.com. [Learn why this is important](#)

CAUTION: This message originated from outside of this organization. Please exercise caution with links and attachments.

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Sincerely,

Lauren Fritzen

Bellingham, WA

Aven, Heather M.

From: Tamela S. Smart <TamelaS@lummi-nsn.gov>
Sent: Monday, April 8, 2024 11:39 AM
To: Sundin, Steven C.; Bell, Kathy M.
Cc: Lena A. Tso; Gregg Dunphy; Jolivette, Stephanie (DAHP)
Subject: Re: DAHP Project 2020-05-03338 RE: The Woods at Viewcrest - Proposed Bellingham, WA Project

CAUTION: This message originated from outside of this organization. Please exercise caution with links and attachments.

Dear Steve Sundin and Kathy Bell,
The Lummi Nation Tribal Historic Preservation Office (LNTHPO) would like to be notified of when the archaeologist will be conducting the additional testing that Stephanie Jolivette (DAHP) recommended. We would like to make a site visit when the testing is being carried out.

These comments are based on the information available at the time of the review. The LNTHPO should review any changes related to the proposed project. Should you have any questions or concerns, please do not hesitate to contact me at 360-927-2944 or via email at tamelas@lummi-nsn.gov.

Sincerely,

Tamela S. Smart (she/her)
Deputy THPO/Compliance Officer
Lummi Nation Culture Department
2665 Kwina Road, Bellingham, WA 98226
Cell: 360-927-2944 Email: TamelaS@lummi-nsn.gov

Records, maps, or other information identifying the location of archaeological sites in order to avoid the looting or depredation of such sites are exempt from disclosure (RCW 42.56.300)



From: Jolivette, Stephanie (DAHP) <stephanie.jolivette@dahp.wa.gov>
Sent: Friday, March 29, 2024 1:42 PM
To: Sundin, Steven C. <ssundin@cob.org>
Cc: Lena A. Tso <LenaT@lummi-nsn.gov>; Gregg Dunphy <GreggD@lummi-nsn.gov>; Tamela S. Smart <TamelaS@lummi-nsn.gov>; Bell, Kathy M. <kbell@cob.org>
Subject: DAHP Project 2020-05-03338 RE: The Woods at Viewcrest - Proposed Bellingham, WA Project

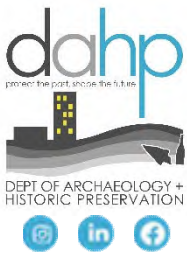
Hello Steve Sundin,

We have reviewed the archaeological survey report and the project documents available on the City of Bellingham website. Please see the attached letter from the DAHP recommending the following:

- Additional archaeological survey for planned activities crossing and within the shoreline area – including storm drainage, improvements to beach access trails, and any other planned activities. See the attached letter for specific details.
- An IDP Training for on the ground staff and IDP be followed for all activities in the already surveyed upland area.
- Notification to affected Tribes and site access if requested.

See the attached letter for a more detailed discussion. Feel free to contact me if you have questions about these recommendations.

Best,
Stephanie

Stephanie Jolivette (*She/Her/Hers*)
Local Government Archaeologist

Email: Stephanie.Jolivette@dahp.wa.gov
Mobile: (360) 628-2755 | Main Office: (360) 586-3065
Hours: 8AM - 4:30PM Monday to Friday
Physical Address: 1110 Capitol Way South Suite 30, Olympia, WA 98501
Mailing Address: PO Box 48343, Olympia, WA 98504-8343

www.dahp.wa.gov

From: Tamela S. Smart <TamelaS@lummi-nsn.gov>
Sent: Monday, March 25, 2024 3:45 PM
To: Bell, Kathy M. <kbell@cob.org>; Sundin, Steven C. <ssundin@cob.org>
Cc: Lena A. Tso <LenaT@lummi-nsn.gov>; Jolivette, Stephanie (DAHP) <stephanie.jolivette@dahp.wa.gov>; Gregg Dunphy <GreggD@lummi-nsn.gov>
Subject: Re: The Woods at Viewcrest - Proposed Bellingham, WA Project

External Email

Dear Kathy Bell,
The Lummi Nation has received notice of the proposed The Woods at Viewcrest Project, located at 352 Viewcrest Road, Bellingham, Washington and is responding as an affected tribe. The Lummi Nation Tribal Historic Preservation Office (LNTHPO) has facilitated a review of the distributed project documents including the following report by Garth L. Baldwin, Courtney J. Paton, and Marsha R. Hanson:

- "Cultural Resources Review of 352 Viewcrest Road (TPNs: 370212030004, 370213075542, 370213083499, 370213113550), Bellingham, Whatcom County, Washington " dated July 20, 2020.

Based on this review, The LNTHPO recommends that the project crew conducting the ground disturbing work receive an Inadvertent Discovery Plan (IDP) training from a professional archaeologist. The IDP should be on-site and followed should archaeological resources or human remains be encountered. The LNTHPO would also like to be notified of the project schedule and be allowed to make site visits.

Please consult with the Department of Archaeology and Historic Preservation (DAHP) regarding historic site 45WH77.

Inadvertent Discovery of Archaeological Resources:

Should archaeological resources (e.g. shell midden, animal remains, stone tools) be observed during project activities, all work in the immediate vicinity should stop, and the area should be secured. The

Washington State Department of Archaeology and Historic Preservation (Stephanie Jolivette, Local Government Archaeologist 360-628-2755) and the Lummi Nation Tribal Historic Preservation Office (Lena Tso, THPO 360-961-7752; Tamela Smart, Deputy THPO 360-927-2944) should be contacted immediately in order to help assess the situation and to determine how to preserve the resource(s). Compliance with all applicable laws pertaining to archaeological resources is required.

Inadvertent Discovery of Human Skeletal Remains on Non-Federal and Non-Tribal Land in the State of Washington (RCWs 68.50.645, 27.44.055, and 68.60.055)

"If ground disturbing activities encounter human skeletal remains during the course of construction, then all activity will cease that may cause further disturbance to those remains. The area of the find will be secured and protected from further disturbance until the State provides notice to proceed. The finding of human skeletal remains will be reported to the county medical examiner/coroner and local law enforcement in the most expeditious manner possible. The remains will not be touched, moved, or further disturbed. The county medical examiner/coroner will assume jurisdiction over the human skeletal remains and make a determination of whether those remains are forensic or non-forensic. If the county medical examiner/coroner determines the remains are non-forensic, then they will report that finding to the Department of Archaeology and Historic Preservation (DAHP) who will then take jurisdiction over the remains. The DAHP will notify any appropriate cemeteries and all affected tribes of the find. The State Physical Anthropologist will make a determination of whether the remains are Indian or Non-Indian and report that finding to any appropriate cemeteries and the affected tribes. The DAHP will then handle all consultation with the affected parties as to the future preservation, excavation, and disposition of the remains" (DAHP).

These comments are based on the information available at the time of the review. The LNTTHPO should review any changes related to the proposed project. Should you have any questions or concerns, please do not hesitate to contact me at 360-927-2944 or via email at tamelas@lummi-nsn.gov.

Sincerely,

Tamela S. Smart (she/her)
Deputy THPO/Compliance Officer
Lummi Nation Culture Department
2665 Kwina Road, Bellingham, WA 98226
Cell: 360-927-2944 Email: TamelaS@lummi-nsn.gov

Records, maps, or other information identifying the location of archaeological sites in order to avoid the looting or depredation of such sites are exempt from disclosure (RCW 42.56.300)



From: Bell, Kathy M. <kbell@cob.org>
Sent: Monday, March 25, 2024 2:49 PM
To: Bell, Kathy M. <kbell@cob.org>; Sundin, Steven C. <ssundin@cob.org>
Subject: The Woods at Viewcrest - Proposed Bellingham, WA Project

Good afternoon.

The City of Bellingham would like to inform your agency that a Notice of Application for a 38-lot preliminary plat located at 352 Viewcrest Road, Bellingham has been issued. This notice is anticipated to generate significant public interest and the public may reach out to your agency.

Currently, the preliminary plat application does not propose any in-water work. A forest practice application may be required for conversion of approximately 20% of the 37-acre site for infrastructure and the proposed lots. Tribal Historic Preservation Offices will be further notified during the SEPA review process.

In the event your agency is contacted for information related to this project, you may direct them to The Woods at Viewcrest project webpage found here: [The Woods at Viewcrest - City of Bellingham \(cob.org\)](http://TheWoodsatViewcrest-CityofBellingham.cob.org)

The City has not issued a SEPA threshold determination at this time and you will be notified when that determination is issued.

Thank you for your consideration. If you have further questions, please feel free to reach out to Steve Sundin at ssundin@cob.org or myself.

Kathy Bell | Senior Planner

Planning & Community Development Dept., City of Bellingham

360.778.8347 kbell@cob.org



The Bellingham Plan will help shape the city's future. Learn how you can take part!

[The Bellingham Plan | Engage Bellingham](#)

Note: My incoming/outgoing e-mail messages are subject to public disclosure requirements per RCW 42.56

CAUTION: This email has been received from outside the Lummi Indian Business Council – Think before clicking on links, opening attachments, or responding.

CAUTION: This email has been received from outside the Lummi Indian Business Council – Think before clicking on links, opening attachments, or responding.

Aven, Heather M.

From: Aaron Angel <aaronangel23@gmail.com>
Sent: Tuesday, April 9, 2024 9:08 AM
To: G.Proj.Wood at Viewcrest
Subject: Public comments on the woods at viewcrest

[You don't often get email from aaronangel23@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

CAUTION: This message originated from outside of this organization. Please exercise caution with links and attachments.

I have three concerns about the proposed project:

Traffic on Viewcrest

Soil stability

Effect on wildlife.

Viewcrest Dr is not large enough and not in good enough condition to handle the construction traffic and then the resident traffic that will eventually follow. If this project is to be done, viewcrest should be widened and bike and pedestrian paths added. This project will destroy the quality of life for those who live on Viewcrest.

My second concern is soil stability. There is a large amount of water that filters down through my lawn from the hill above. I am concerned that with taking trees out, addition of pavement for driveways, there will be increased water flow down the hill and this will lead to instability. Some of the slopes are steep!

My third concern is for the wildlife in the area. The area under discussion seems to be a corridor particularly for deer to go from Chuckanut Mountain to this area. This is will be disrupted with development. We have also seen bobcats and fox in the neighborhood and wonder how they would be affected by the development. Has this been addressed?

Aaron Angel
415 S Clarkwood Dr
Bellingham WA 98225

Sent from my iPad

Attn: woodsvc@cob.org

Subject: **Public comments to The Woods At Viewcrest Application.**

My name is Paul Brock. My wife, dog and I live at 301 Crest Ln with the back of our property fronting 304 Viewcrest. We regularly use Mud Bay and are daily walkers along Viewcrest with a 15-year history in this location and 35 years total in Bellingham. We believe in responsible development and infill however this project as described in the project narrative and supporting documents shows that it will do more harm than good. The general categories that I have my concerns in are Public Safety, Geohazard, Drainage and Stormwater impacts, Traffic and livability on Viewcrest, Wildlife, Adherence to the neighborhood plan, Character of the neighborhood and finally, The trail. A general concern I have that can be seen across these categories is that the documents supporting this application are misleading or omit key facts when they don't support the application. The applicant has also asked for numerous variances without offering a reason why these variances are not simply requests to make things easier for the applicant at the expense of public good. For the reasons found in this document I encourage the City to find a determination of significance and require an independent Environmental Impact Statement (EIS) to clarify, correct and complete the application process. I believe that an independent Environmental Impact Statement will show the development as planned is infeasible and will guide the applicant to a more sensible and sustainable use for this property.

Public Safety:

There is significant rockfall hazard from the steep hillsides. I'm not a geologist but I can see the boulders on the beach at the bottom of the cliff that makes up this project site. These range in size up to the size of a house. These boulders did not float up from the bay and speak to the general instability of the cliff above. As new construction and ground disturbance over a prolonged period of time occur and increase the likelihood of rockfall it's not clear what the applicant is going to do to protect the public beach trail below from increased rockfall hazards.

The requested variances in sidewalk construction on the east side of the 10th street right of way on Viewcrest should not be entertained. The applicant should fulfill their obligations to pedestrian safety in front of this development:

"The proposed project has frontage on Viewcrest Road. Road improvements along this frontage are not proposed to meet the ¾ standard. This road is currently improved with asphalt drive lanes at 22' of width, with thickened asphalt edge and no sidewalks on either side. The project proposes to add a setback sidewalk along the south side of Viewcrest from the proposed entry to the west property line (the frontage of the Property). This sidewalk is proposed to be setback for pedestrian safety and is proposed to be constructed from pervious concrete because the soils in this area can accommodate infiltration of runoff. No on-street parking is proposed. In addition, no frontage improvement is proposed at the intersection of Viewcrest Road and the 10th Street right of way, or along the short 30' private frontage immediately east of the 10th Street right of way. See Exhibit A. This design does not meet the standard and requires a variance."

Traffic patterns on Viewcrest and Chuckanut were evaluated during the height of COVID in August and September 2020 and traffic patterns on 16th, Fieldston, Clark and Willow were ignored. Traffic patterns have stabilized since then and a current traffic study should be commissioned to reflect the impacts of both the 38 proposed single family residences and the 152 multifamily residences that are allowed on

single family building sites. This study should not only look at Viewcrest and Chuckanut but the neighborhood connector roads including 16th, Clark, Willow, Fieldston and Hawthorn.

There is no mention of 16th street in the TIA. 16th Street is a minor road but used by most people that are coming from the north or leaving to the north to and from Viewcrest and Chuckanut. With this not mentioned in the TIA it's clear that either doing the survey in the height of the pandemic didn't give enough information to understand that traffic patterns or it was simply ignored. A current and independent Traffic Impact Study should be commissioned.

This city's statement from the 3rd RFI about a 15% grade road was not addressed:

"Some roadways shown are designed to the allowable maximum grades. Given the geology/topography of the area, and the proposed cuts, it is likely that sandstone bedrock will be encountered. Be aware that the engineering division will be unable to support variances in these maximum grades and that construction of required public facilities may be greatly encumbered due to these conditions"

I'm confident this warning from the Planning Department of the maximum grades for the roads is being treated seriously but this warning does not impact phase 1 of the 3 phase development. Because of the uncertainty of being able to construct the roads and complete either Phase 2 or 3 the 20,000 sq. ft. average minimum lot size should apply to each phase of the project and not the whole project.

Geohazard:

Keeping in mind all the problems in the Geotechnical report identified by 3rd party experts hired by Protect Mud Bay Cliffs, it's important to point out a statement that was made on page 23 of the applicants Geology Report:

"Need for Lot-Specific Reviews

The site-wide geohazard review and supplemental GIS analysis completed to date represents an overview of site features with specific attention paid to potential hazards identified along the boundaries of or intermittently within the large hilly property. It is not intended to serve as a detailed examination of the conditions on individual lots to advise on lot designs. Based on our experience, it is most appropriate to conduct detailed evaluation of topographic and subsurface conditions on individual lots in the future just prior to or during their design and development when proposed features and final layouts can be taken into account."

This report recognized the difficult building conditions on this site saying detailed evaluation of the topographic and subsurface conditions on individual lots should be done before the final layouts can be taken into account. Without this evaluation it's impossible to characterize the geohazards on each lot as drawn. This final evaluation has not been done and as such this application should be denied until that evaluation is complete.

Geotechnical studies were done in the dry season leading to insufficient analysis of drainage and drainage conditions:

"Conditions observed in test pit explorations are interpreted to be representative of the dry season given the timeframe of explorations in the mid-summer. During the wet season, it is anticipated that groundwater and seepage levels will become elevated from those observed in the summer, and that soil moisture contents will be elevated by prolonged wet weather. The groundwater and soil moisture conditions recorded on our test pit logs are valid only for the dates of exploration."

A wet season analysis should be conducted by an independent 3rd party. This application should be denied until this work is completed.

Sheets 4 and 5 of “Exhibit A Project Plans” shows geological hazardous areas in a deceptive green color instead of traditional red as it does in the Geotechnical report. While this is just a color, it is deceptive, and doesn’t represent the danger of those areas. These types of deceptive measures throughout the application and supporting documentation show bad faith by the applicant and for this reason a determination of significance should be found requiring an independent EIS before this application is granted.

a. Minimum Buffer. The minimum buffer shall be equal to the height of the slope or 50 feet, whichever is greater, as measured horizontally away from the top and also away from the toe of the slope.

[22.08.080 Critical area regulations for geologic hazard areas within the shoreline jurisdiction | Bellingham Municipal Code](#)

4. Identification and characterization of all critical areas including their buffers, adjacent to the subject site and characterization of the ecological relationship of the critical area and buffers with any adjacent noncritical areas such as upland forest patches;

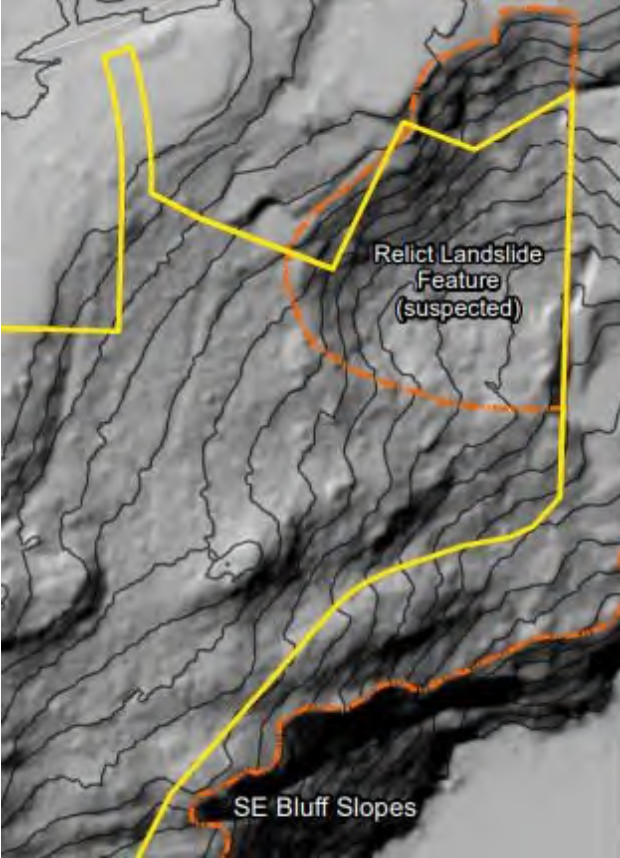
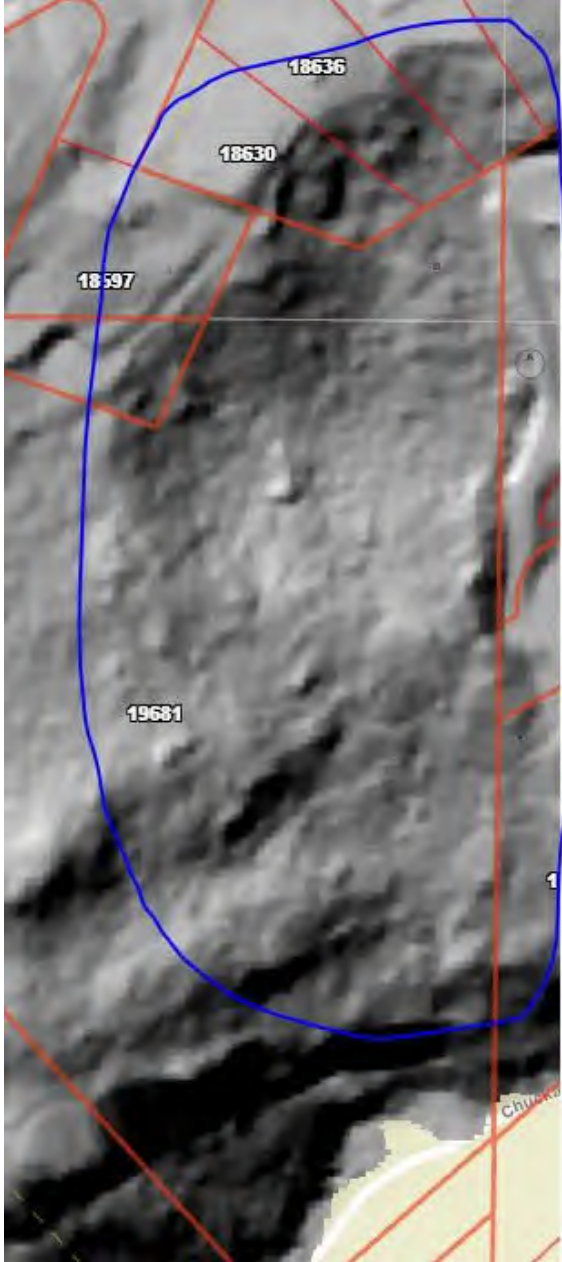
[Ch. 16.55 Critical Areas | Bellingham Municipal Code](#)

BMC 22.08.080.c.1 established the critical area regulations for geologic hazard zones. BMC 16.55.210.C.4 states that critical areas **and their buffers** must be represented. This site contains significant landslide zones and the **buffers for both the landslide and geologic hazard zones** have not been established on the maps provided by the applicant that have the lot and building envelope layouts. It appears that numerous lots are located within the buffers. These buffers should be established by an independent surveyor and overlaid with the lot and building envelopes to show minimum buffers are being met.

Lots 5, 6, 9, 13, 14, 20, 21, 24, 27, 30, 31, and 32 do not meet the building envelope requirements pursuant to BMC 23.08.060.D.1. The applicant should redesign the project so that all building envelopes meet minimum requirements outlined in the Bellingham Municipal Codes.

On sheets 4 and 5 of “Exhibit A Project Plans” some building envelopes either touch the identified geologically significant zones or touch other building envelopes to avoid the hazard zones. A lot-by-lot analysis should be done as recommended by Pacific Surveying to assess if the identified building envelopes truly fit in the proposed lot lines and satisfy minimum distances from hazard areas, property lines and other building envelopes. Given the difficult building conditions on this site, variances should be approved on a case-by-case basis for each building lot as conditions warrant before project approval and not as a blanket approval.

Below the applicant obscures the obvious landslide runout zone with contour lines. This shows not only bad faith by the applicant, but the applicant is proposing lot 37 right in the middle of the runout zone that is visible from the county assessor site. This action is regulated by BMC 22.08.080.c.1. Putting a building lot in this zone reinforces the applicant’s risk tolerance towards geologic hazards is high on this very difficult building site and should lead to a determination of significance and an independent EIS.

 Relict Landslide Feature (suspected) SE Bluff Slopes	 18636 18630 18597 19681 Chickadee
Applicant's LIDAR obscures the obvious landslide feature.	County Assessor LIDAR without obscuring lines shows a landslide area encompassing building lot 37 and progressing to the beach below.

Drainage and Stormwater:

There are missing calculations in every stormwater report presented for each RFI throughout the project process. In Section 6.6 of the stormwater report it states:

"The site improvements will meet Enhanced Treatment for this project with the use of modular wetland devices. The treatment method and sizing calculations are detailed in Section 5.5"

Section 5.5 is missing and the applicant has been informed it was missing at every opportunity. Without these calculations it's impossible to verify the applicants math that dictates the size of modular wetland devices and amount of treatment that needs to be implemented. This shows a bad faith effort on the part of the applicant and as such a determination of significance should be found and an independent EIS should be required.

There is no mention of the significant stormwater that I and other neighborhood residents have witnessed flowing from the property to the northeast across Viewcrest and down towards the Woodlands development. This omission and lack of mitigation strategy in the application shows the applicant did not evaluate the current stormwater/drainage patterns effectively and the subsequent report can't be trusted. Because of this a determination of significance should be found and an independent EIS should be required.

The applicant is not developing the individual lots leaving drainage of individual retaining walls and impervious surfaces up to each developing lot owner and resident. Without a cohesive plan on how to manage drainage and stormwater from these fragmented sources on difficult building locations it's almost certain to lead to unexpected inundation and landslides. The overall strategy of leaving the development and drainage management to each individual lot owner in such a complex environment is a danger to the greater public good. Because of this a determination of significance should be found and an independent EIS should be required

The most significant problem is with the outfall to Mud Bay. It's worth familiarizing ourselves with how the City of Bellingham describes Mud Bay:

"Northeast Chuckanut Bay is Bellingham's richest and most biologically diverse estuary. Birds and other wildlife are easily disturbed by human activity, especially when gathering during migration or roosting along the shore."

[Chuckanut Bay Shorelands - City of Bellingham \(cob.org\)](http://cob.org/Chuckanut-Bay-Shorelands)

"Chuckanut Bay is a unique place! It contains a rare marsh with a mixture of fresh and salt water wildlife communities. It provides habitat for heron, eagles, osprey, red-legged frog, red fox, deer, western tanager, kingfisher, chum, coho, steelhead, cutthroat and salamanders, duck, and clams. According to a recent study, Chuckanut Bay pocket estuary provides the highest level of function out of the seven pocket estuaries in Bellingham Bay (NES 2006). All of the nearshore marine shorelines within Bellingham City limits (including Chuckanut Bay) are listed as critical marine habitat for both Puget Sound Chinook (50 CFR 226) and bull trout (50 CFR 17), as well as providing habitat for the recently listed Puget Sound steelhead trout."

[Chuckanut Village Marsh Restoration Project Overview \(cob.org\)](http://cob.org/Chuckanut-Village-Marsh-Restoration-Project-Overview)

"The bay, its shoreline and the adjoining shoreline and uplands of Clark's Point, is one of the most biologically significant marine habitat areas in Whatcom County"

From the city documentation on Mud Bay:

"BUFFER WIDTH RECOMMENDATIONS

Chuckanut Creek Pocket Estuary

Summary of Key Functions:

This system provides high quality estuarine habitat with multiple habitat features that support

significant wildlife and shellfish populations. Existing buffers are providing high water quality, shoreline protection, and all wildlife habitat functions. water quality issues from Fecal coliform have been documented for this system.

Goals

- *Preserve and protect existing shoreline natural resources including the estuary, beaches, shorelines, fragile ecological areas, fish and wildlife habitats, native vegetation, associated critical areas and buffers. Due to the quality of the habitat in this estuary, the Chuckanut railroad pocket estuary should have the highest priority for preservation.*
- *Preserve and protect the connectivity between the Chuckanut estuary and Chuckanut Creek by protecting habitat corridors.*
- *Improve water quality with emphasis on control of bacterial contamination.*

Objectives

- *Protect critical areas and shoreline ecological processes and functions through regulatory and non-regulatory means, which may include, acquisition of key properties, regulation of development, and incentives.*
- *Manage and treat stormwater and wastewater properly. This may include extending the City sewer to serve areas currently without service.*
- *Maintain wildlife function within buffers and estuary.*

Buffer Recommendation

- *Wildlife Function: Maximum width [200 feet where available, not less than 150 feet] – should be applied to sites where forested or naturally vegetated buffer is present.*
- ***Water Quality Function: 50 feet on gently sloping sites and 100 on sites with moderate to steep slopes (should be applied to sites where the buffer has already been decreased to less than 100 feet). There should be no pesticides, herbicides or fertilizer application allowed in the buffer. Un-groomed native vegetation should be encouraged.”***

[Pocket Estuary Management Feb 06 \(cob.org\)](#)

Bellingham Bay:

200' buffer along Chuckanut Bay and Clarks Point

[SMP STAFF REPORT \(cob.org\)](#)

There are many other documents that can be obtained from the city of Bellingham's own public facing website that continue to describe Chuckanut Bay/ Chuckanut Estuary / Mud Bay as a magical place warranting the highest level of protections. The disregard by the applicant for the obvious care that must be taken with Mud Bay by anyone that has seen it should lead to a determination of significance and the requirement of an EIS to give the planning department all the objective information available to make decisions on the stormwater outfall aspect of this project.

Mud Bay is identified by the City as distinctly different from the free flowing Chuckanut bay because of the narrow opening in the railroad trestle that intersects the bay. This leaves Mud Bay as a restricted

flow category 1 Marine Estuary and as such requires additional protections. There is an identified plan to breach the trestle and return free flow to Mud Bay making it no longer distinct and simply part of Chuckanut Bay. Once this plan is executed this may recategorize Mud Bay. There are 2 options that could be explored by the applicant to maintain the plan to outfall stormwater onto the beach below the project. For the Stormwater outfall to reach free flowing saltwater they can wait for funding of the trestle breach to be found or participate in repairing the closed culvert and tying into that culvert to send development stormwater to the other side of the tracks where it can mix with the free flowing Chuckanut Bay. Any argument stating that there are no options to get water from the outfall to free flowing waters is not being made honestly. Just because it's hard, or it might take a long time, doesn't mean it can't be done.

30. Chuckanut Spit. BBDP #29. Marine reach 17.	There is apparently a closed culvert under the rail trestle. The action would involve either opening the culvert or replacing the culvert with a new culvert that was bigger and more open.	Work will begin when funding is available
31. Chuckanut Breach. BBDP #30. Marine reach #19.	There is one rail trestle allowing exchange between Bellingham Bay and the embayment in the north end of Chuckanut Bay. The action would consist of either installing a large open culvert under the rail line or building another trestle along the eastern end of the rail bed.	Work will begin when funding is available

[SMP Restoration Plan \(cob.org\)](http://cob.org)

With the current design for the Stormwater system, stormwater entering the Mud Bay estuarine wetlands at low tide will strike the ground — it will not fall into open waters which might dilute it. The pollutants in that stormwater, such as salmon-killing 6PPD-quinone from car tires, will concentrate on the ground at the stormwater outflow point. When the tide begins to inundate the exposed beach, the inflow of tidal water will push those pollutants up into Chuckanut Marsh and Chuckanut Creek. This will have major consequences and should prompt a determination of significance and an independent EIS should be required.

Traffic and Livability on Viewcrest:

The traffic impact study was conducted during the height of the pandemic and doesn't represent normal traffic patterns. Viewcrest is narrow with difficult visibility in places and many near misses of pedestrians (Me included), and a lack of sidewalks to support increased car traffic and separate pedestrians from vehicles. 38 homes and the construction of them will create more traffic pressure on an already pressured under sized road. With no commitment of only having single homes on this site new building codes allows for 4 plex's on these properties meaning 152 possible total homes. The traffic analysis is obviously flawed and does not consider the approved neighborhood plan. This shows a bad faith effort by the applicant and should trigger an independent traffic analysis with suggestions on how to mitigate the increased dangers to pedestrians, vehicles, and wildlife.

Wildlife:

The Wildlife Habitat Assessment as it stands has several flaws. There are no black bear activities on the site as the study states. The surveyor's saw obvious deer rubbings and classified that as bear activity. The

study stated that there was no nesting activity from protected species, but a bald eagle nest can be clearly seen in the tree tops from the beach on the south east corner of the property. There are well documented sightings of large animals like cougar, bobcat, fox, and coyote that the survey missed or omitted. Failure to consider the wildlife corridor is the most logical reason for not addressing these species. For these reasons I don't believe the wildlife study was performed in good faith and another study should be done by an independent licensed assessor.

Below we can see the outline of the project site identified as an "Important Wildlife Habitat Area". The importance of this property and the connecting corridor between Clarks point and 100 Acre Wood / Chuckanut Mountain is recognized by the city and easily located on their public website. The omission of this attribute in the application materials should lead to a determination of significance and an independent EIS should be obtained to help inform the city of these attributes that the applicant has avoided in the application packet. It should be noted that the important wildlife habitat area matches the exact contours of the applicant's project. Mitigation doesn't mean making the area smaller. Any changes to this area should be seen as significant and lead to a determination of significance for this project.

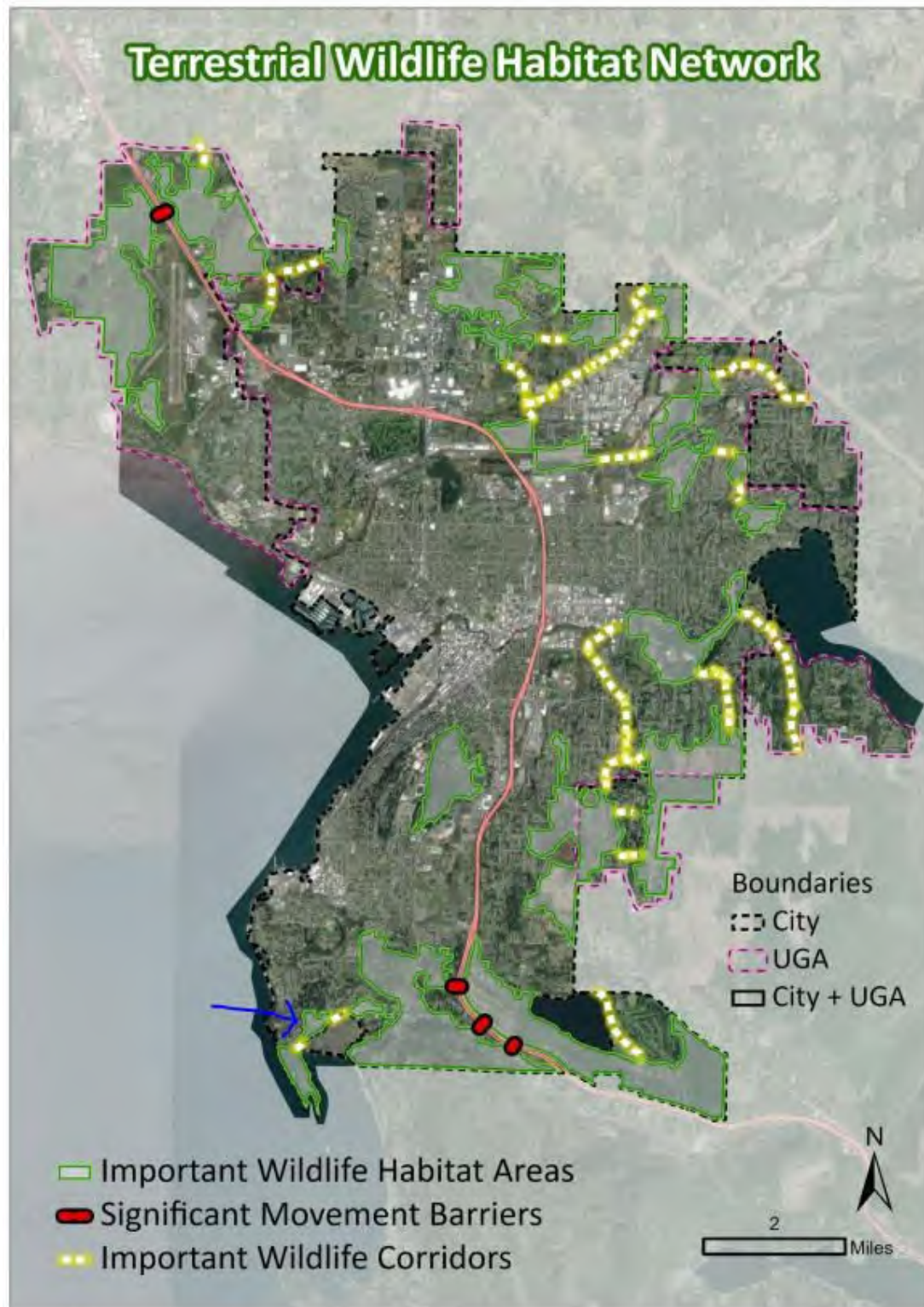


Figure 8. Terrestrial Wildlife Habitat Network. This analysis does not consider habitat extending outside of the City boundary, or habitat for marine or freshwater fish.

Adherence to the neighborhood plan:

The project known as The Woods at Viewcrest, is in the Edgemoor neighborhood, area 7. The following is how the city describes this area and the Bellingham Municipal Code that regulates development in the zone.

“Area 7 As previously described herein, Area 7 is a highly valued natural resource for which conservation has been a consistent recommendation. While a designation as "public" might seem more appropriate for the area, the land is under private ownership, so a land use designation is made which will permit development while maintaining the exceptional natural qualities of the properties.

AREA 7 LAND USE DESIGNATION: SINGLE FAMILY RESIDENTIAL, LOW DENSITY

The Bellingham Municipal Code is current through Ordinance 2024-02-006, passed February 12, 2024.

The BMC contains 2 significant conditions for Area 7 of Edgemoor, the zone this property is located in:

1. 20,000 sq. ft. min. detached lot size, or one lot per 20,000 sq. ft. average overall density
2. Improvement to Fieldston and Willow Rds. as neighborhood collectors

[20.00.060 Edgemoor neighborhood table of zoning regulations | Bellingham Municipal Code](#)

This development is being proposed to be done in 3 phases because of the complexity of each phase. Phase one is relatively straight forward and includes the smallest footprint lots along Viewcrest. Due to the difficult building conditions, there is no guarantee that phase 2 or 3 will be possible or financed once the project starts. Each phase should conform to the approved neighborhood plan for minimum 20,000 sq. ft. average lot size. Additionally, there is no mention of improvements to Fieldston and Willow roads in the project narrative or accompanying documents. This is the largest undeveloped property in Area 7 of Edgemoor and is clearly the intended target of the condition of these improvements to Fieldston and Willow. Without the improvements to Fieldston and Willow passed by BMC ordinance 2024-02-006, a proposed project of this size should be denied.

Character of the neighborhood:

The applicant makes a point to say that the surrounding neighborhood is a higher income neighborhood with a higher proportion of tax base. My opposition is not because the applicant is proposing low-income housing in a high income neighborhood. Quite the opposite. The applicant goes on to say that this project will increase the tax base with high income properties and makes no mention of low/middle income housing. This development if built as proposed will detract from the neighborhood by changing the look and feel of the overall neighborhood with the smallest lots that can be found in the neighborhood. It will increase flooding from the northeast side of the property. It will irreparably change Mud Bay making an already stressed environment less usable to the animals and people that use it. It will make Viewcrest and Fieldston less walkable than they already are. It will disconnect the wildlife corridor fragmenting the land trust property at Clarks Point. It will reduce public safety with geohazards

and urban fire danger. A full buildout of 38 to 152 homes crammed into every possible buildable inch on the proposed property harms me and will make my neighborhood less and not more than it is today.

The Trail:

The Planning Department has asked for a trail that would lead to SeaPines road and then the beach below from the SeaPines trail. The trail represents one of the only positive impacts to the neighborhood that this project is proposing. The applicant understands the want by the city for a public trail and has been squeezing it in different ways over the various RFI's with the latest plan given by the applicant leading to the weakest commitment yet.

"A trail easement is proposed through the site for future trail construction by the City (this trail may be constructed by the Applicant in exchange for park impact fee credit and a reduced easement width). The trail is located to avoid and minimize critical areas impacts."

I believe this trail should remain required and not be used in exchange for park impact fee credits or a reduced easement width. The trail is a livability issue and will reduce car traffic on Viewcrest and parking pressure on the limited number of parking spaces located at the beach below.

There are several professional opinions that have or will be submitted by experts in wetlands, wildlife, geology, and stormwater management that will give opposing views of the applicant about the feasibility of this project as designed. These experts have demonstrated significant impacts to the environment and surrounding community. These views should be treated seriously, reviewed, and considered in the decision-making process. I hope that after hearing from the community and reviewing these highly respected professional opinions a determination of significance will be found for this project leading to an EIS to clarify, correct and complete the application process. I believe that an independent Environmental Impact Statement will show the development as planned is infeasible and will guide the applicant to a more sensible and sustainable use for this property.

Thank you for taking the time to review my public comments,
Paul Brock
301 Crest LN
Bellingham WA 98229
360.715.1643
Brock_paul@hotmail.com

Aven, Heather M.

From: Jerry Dewig <jerrydewig@hotmail.com>
Sent: Tuesday, April 9, 2024 11:01 AM
To: Bell, Kathy M.
Subject: Mud Bay

You don't often get email from jerrydewig@hotmail.com. [Learn why this is important](#)

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Dear Kathy Bell,

It has come to my attention that there are plans to further develop Mud Bay. MudBayCliffs.org makes a lot of good points about potential damage to the ecology, environment, wildlife, and even safety issues, but they seem to miss the most important intangible point; how much development is enough? This a very unique pocket estuary. Any public servant who is making a decision on the future of Mud Bay should be required to go there at low tide and walk underneath the cliffs. The rock formations are amazing and the area is full of plants and wildlife. They should also go there at high tide and kayak in the protected, calm waters. It is a very special place. I've often said to my wife "it is hard to believe that we are in a city here". There are not many accessible places like this left in the world, let alone Whatcom county.

I think that it would be very short sighted to develop this unique property so that a few wealthy individuals will make money from it, and a few other lucky individuals will be able to escape to their private deck to overlook what they destroyed. Kind of ironic, isn't it? This development will come at a huge cost to the environment and the community. Once it's developed, Mud Bays unique qualities will be gone forever. Gone from current and future generations to enjoy.

For this reason alone, I ask that city officials make a choice for the greater community and protect Mud Bay from Development.

Thanks for your considerations,
Jerel & Evangeline Dewig

Aven, Heather M.

From: Christopher Grannis <chrgra@gmail.com>
Sent: Tuesday, April 9, 2024 11:39 AM
To: Bell, Kathy M.; sssundin@cob.org; Lyon, Blake G.
Subject: Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

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Kathy Bell, Senior Planner, kbell@cob.org

Steve Sundin, Senior Planner, ssundin@cob.org

Blake Lyon, Planning & Community Development Department Director, bglyon@cob.org

Planning & Community Development Department

210 Lottie Street

Bellingham, WA 98225

From: Christopher Grannis

701 Chuckanut Dr N

Bellingham Wa 98229

Dear Ms. Bell, Mr. Sundin, and Mr. Lyon,

An Environmental Impact Statement (EIS) must be prepared for *The Woods at Viewcrest*, a proposed subdivision on the mature woodlands and wetlands of Mud Bay Cliffs. The proposed 38 lot development, (which could be 152 housing units due to new state law) on the north shoreline of the Chuckanut Creek Estuary, aka, "Mud Bay" the City identified wetland estuary, will have a significant adverse environmental impact.

The site is now mature forest and much of the proposed site involves steep sandstone cliffs. Building infrastructure and preparing building sites threaten the unstable geology. Removing trees and topsoil will compromise the wetlands and destroy habitat and City identified wildlife corridors. The current proposal to drain untreated storm water polluted with new blacktop and roofing runoff, landscaping chemicals, pet waste, and automobile pollution into sensitive wetlands, a salt water marsh, and the Estuary would cause significant adverse environmental impact.

We value the health of the Salish Sea and its ecosystems--a critical component being its wetlands and estuaries. These ecosystems are important from the beginning of the food chain in the wetlands to the Salmon and Orcas in the Salish Sea. An Environmental Impact Study is essential for this proposal.

In order to minimize the degradation of the Salish Sea ecosystem require an Environmental Impact Statement for the proposed subdivision on Mud Bay Cliffs.

Thank you.

Christopher Grannis
360 647 4758

Aven, Heather M.

From: Peter Mock <mockph@hotmail.com>
Sent: Tuesday, April 9, 2024 12:28 PM
To: Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.
Cc: Info@MudBayCliffs.org
Subject: Require an EIS for the Proposed Subdivision on Mud Bay Cliffs
Attachments: Trash & erosion at Mud Bay bank (2).jpg; Trash & erosion at Mud Bay bank (3).jpeg

Some people who received this message don't often get email from mockph@hotmail.com. [Learn why this is important](#)

CAUTION: This message originated from outside of this organization. Please exercise caution with links and attachments.

To: Kathy Bell, Senior Planner, kbell@cob.org
Steve Sundin, Senior Planner, ssundin@cob.org
Blake Lyon, Planning & Community Development Department Director, bglyon@cob.org
Planning & Community Development Department
210 Lottie Street
Bellingham, WA 98225
From: Peter Mock, 1705 Fairhaven Ave, Bellingham WA 98229
Date: April 9, 2024
Subject: **Require an EIS for the Proposed Subdivision on Mud Bay Cliffs**

Dear Ms. Bell, Mr. Sundin, and Mr. Lyon,
I ask you to prevent harms to Bellingham's publicly-owned spaces connected to Mud Bay Cliffs, and to safeguard our community against known and severe subdivision development risks, by requiring an Environmental Impact Statement (EIS) be prepared for *The Woods at Viewcrest*, a proposed subdivision on the mature woodlands and wetlands of Mud Bay Cliffs.

My brief history of living 48 years in Chuckanut Village & opinion/request RE 'The Woods at Viewcrest' development proposal

I moved to Chuckanut Village in 1976 and have lived there since. Now that I'm almost 74 years old, that makes it 2/3 of my life. In all these years I have seen many changes to my neighborhood and surrounding area there. The 'Brizza' development in the mid 1980's having been the most impactful.

Prior to the 'Brizza' development we had Blue Herons, Eagles, several species of owls, shorebirds and numerous other birds nesting in the woods along the hillside. Deer and other wildlife would freely roam all the way to the bay. The mudflat tidelands were loaded with mussels, oysters and clams we could harvest. Salmon would gather in the bay to migrate up Chuckanut Creek to their spawning grounds. With all that and the sandstone cliffs in the forest, including the magically sculpted sandstone monoliths along the shoreline, we had an enchanted playground and school room for us and our kids to experience and learn.

When most of the trees were cut down there for the 'Brizza' development and the hillside graded, the sandstone cliffs plowed under, and the newly established lawns fertilized, the once abundant creatures were greatly reduced or even vanished entirely. The magic was gone there! Erased and eradicated!

In the intervening years the harvesting of shellfish was closed in the mudflats due to Red Tide contamination. No doubt all related to fertilizer run-off from the newly established lawns and plantings. I could even observe that several of the new homes needed foundations to be reenforced over the years to mitigate erosion of the now unstable soil base.

Some new homeowners even encroached on the protected shoreline belt with the construction of swimming pools or the like, or even dumped construction waste and excavation debris into the same (see photos attached).



It borders on a crime what we had allowed to be done to our precious environment! Aren't we already digging humanities grave?

To repeat this violation by allowing 'The Woods at Viewcrest' development to proceed in its currently proposed form, especially with all the new knowledge of the environmental consequences, is unconscionable! To do this without a comprehensive Environmental Impact Statement must surely border on, or already be, insanity! And if you are hiding behind paragraphs and regulations, at least follow them!

The proposed subdivision (of 4 current lots into 38 proposed lots, with up to 152 housing units) would likely impose **significant adverse impacts to the environment**. In addition to these adverse impacts, the developer's application materials are flawed in substantive ways, which further exposes the public's interests, including public investments in neighboring fish and wildlife habitats, to considerable risk. The likely significant adverse impacts, coupled with the substantive application flaws, compel the city to issue a State Environmental Protection Act (SEPA) Determination of Significance and require an EIS.

A. Unique and Special Site. The location of the proposed subdivision is unique both in its **specific characteristics** and its **physical setting**. These unique characteristics and physical setting are important factors that influence why the current subdivision proposal is likely to have significant adverse environmental impacts. The site of this proposed subdivision is currently distinguished by these features:

Specific Characteristics

- **Important Habitat Hub.** The 2021 City of Bellingham *Wildlife Corridor Analysis* designates this property, which consists of rare mature shoreline woodlands and wetlands habitat, as an *Important Habitat Hub* – and one of the only *Important Habitat Hubs* in south Bellingham that remains unprotected.
- **Geohazards.** Significant landslide, erosion and seismic hazards exist throughout the site, and they are sensitive to development disturbances including hydrological changes.
- **Storm Microclimate.** This location is well-known locally for its microclimate of gales during storms – among the strongest gales in Bellingham. Gale intensity has been increasing over the past decade due to climate change. The existing mature woodland acts as a protective buffer for wildlife (both resident and sheltering), and for the community.

Physical Setting

- **Wildlife Network.** This *Important Habitat Hub* is the center part that links two other *Important Habitat Hubs* – Clark's Point and Chuckanut Village Marsh/ Chuckanut Bay Open Space – all of which are connected to a larger, protected *Wildlife Network*. The public has invested heavily to protect and maintain the Hubs and Corridors of this Wildlife Network.
- **Estuarine Wetlands.** Mud Bay Cliffs is a key watershed adjacent to Mud Bay's Category I Estuarine Wetlands.
- **Stormwater.** Most drainage from this site flows directly into the Mud Bay Estuarine Wetlands. Drainage discharges from existing city stormwater outlets have already begun to impair the health of this wetland habitat.
- **Great Blue Herons.** The Post Point Colony of Great Blue Herons relies on this site for shelter, and on the Mud Bay Estuarine Wetlands to feed their young. This Heron Colony fled its previous home near Chuckanut Bay as a result of subdivision development activity. Significant public investment has been made to provide habitat protection for this Colony at its new Post Point nesting location.
- **Salmon.** Juvenile salmonids rely on clean water and safe passage through the Mud Bay Estuarine Wetlands, Chuckanut Village Marsh, and Chuckanut Creek. Significant public investment has been made to restore these habitats for salmon.
- **Traffic Safety and Level of Service.**
 - Traffic safety issues have been well documented on Edgemoor's narrow, hilly roads with limited sightlines, including where Viewcrest Road intersects Chuckanut Drive (State Route 11). The traffic conditions where Fairhaven Middle School meets the 12th Street Bridge are particularly dangerous. These well-documented issues create precarious and unsafe conditions for walkers, runners, cyclists, and motorists. The city has been notified of these hazardous conditions but has yet to take any action to mitigate them.
 - Viewcrest Road and the roadways it intersects provide unique access to important public amenities. These amenities tend to have more visitors seasonally and on weekends. Viewcrest's intersection with Chuckanut Drive is significant as an access point to public amenities including Clark's Point, Hundred Acre Woods (trailhead at the intersection), and the Chuckanut Scenic Byway (which itself is the sole access to multiple public parklands, trail systems, and public natural amenities).

B. Severe Application Flaws. The proposed subdivision application is severely flawed. Objective and comprehensive assessments suitable to this unique site and setting must be completed to address these flaws before an informed consideration of any subdivision proposals can be made. For example:

- The Stormwater Management Plan is incomplete, lacking key required plan elements. As proposed, the subdivision would result in significant increases in runoff volumes, speeds, and sediment/pollution loads. Moreover, by discharging polluted stormwater into the Mud Bay Estuarine Wetlands, significant adverse environmental impacts are probable. The plan fails to address how the ecologically sensitive Mud Bay Estuarine Wetlands, and the Public Shoreline, will be impacted by this development.
- The Wildlife Habitat Assessment fails to: identify this site as an *Important Habitat Hub* connected to other nearby hubs by *two Important Habitat Corridors*; address the harmful wildlife *Habitat Network* fragmentation the proposed development would cause; address impacts to the Mud Bay Estuarine Wetlands and salmon habitat of Chuckanut Village Marsh and Chuckanut Creek; address impacts to the Post Point Heron Colony (feeding and sheltering); provide a sufficient wildlife inventory.
- The Geotechnical Investigation & Geohazard Report fails to assess the impact of development on groundwater flow and the likely increase in probability, frequency and magnitude of flooding, erosion, and landslide activity. It is documented that development activities would likely make the site hazardous for the subdivision residents, neighbors, and the community at large. These dangers would begin with development disturbances, and would persist for decades to come.
- There is no Hydrology assessment at all, which this unique site's characteristics and setting necessitate. A Hydrology report is essential to evaluate potential environmental impacts, and ensure that any development at this site will not harm local ecosystems and water quality. Clearly, development of infrastructure such as roads, retention walls, driveways, structures and other hardscaping will alter the topography and the flow of water on this geologically complex site. With soils disturbances and proposed infrastructure cutting across the site, it is probable that saturation, drainage, and flooding would be greatly affected. Erosion, rockfall, landslide and flooding to the north would be likely, unless plans are developed using Hydrology information. These likely impacts could severely affect neighboring public and private lands, waters, and wildlife habitat.
- The applicant has failed to show how tree removal during both initial infrastructure development, and then later by lot owners, would impact the **mature woodland**. There is no assessment for how the gales from worsening storms, combined with extensive tree removal, would impact sheltering wildlife and public safety. There is no assessment of how the remaining trees in the proposed narrow 200-foot "buffer" along the shoreline would be affected by adjacent tree removal; it is probable that tree removal would degrade the health of nearby trees in the proposed "buffer" wildlife habitat connecting two Important Habitat Hubs.
- The Traffic Impact Analysis fails to address how Levels of Service to public parks, public natural amenities, and scenic byway would be impacted by traffic from this development. Further, it fails to address the known public safety issues which would be exacerbated by increased traffic from the 152 potential new housing units, since fourplexes would be allowed on all 38 lots under a new statewide law.

Because of this site's unique specific characteristics and unique physical setting, and because of the subdivision application's profound flaws, the city does not have the accurate, sufficient, and objective information it needs to identify and assess potential significant adverse impacts.

Moreover, the application materials themselves indicate that the proposal is likely to have a significant adverse impact on the natural environment, the built environment, and public health and safety.

I ask the city to protect our public interest and prevent harms to the community:

Require an Environmental Impact Statement, so that any permit decisions are based on a full understanding of the risks to the environment, and to public safety.

Sincerely,
Peter Mock





Aven, Heather M.

From: crstieger@comcast.net
Sent: Tuesday, April 9, 2024 12:16 AM
To: Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.
Subject: Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

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CAUTION: This message originated from outside of this organization. Please exercise caution with links and attachments.

Dear Ms. Bell, Mr. Sundin, and Mr. Lyon,

I ask you to prevent harms to Bellingham's publicly-owned spaces connected to Mud Bay Cliffs, and to safeguard our community against known and severe subdivision development risks, by requiring an Environmental Impact Statement (EIS) be prepared for The Woods at Viewcrest, a proposed subdivision on the mature woodlands and wetlands of Mud Bay Cliffs.

The proposed subdivision (of 4 current lots into 38 proposed lots, with up to 152 housing units) would likely impose significant adverse impacts to the environment. In addition to these adverse impacts, the developer's application materials are flawed in substantive ways, which further exposes the public's interests, including public investments in neighboring fish and wildlife habitats, to considerable risk. The likely significant adverse impacts, coupled with the substantive application flaws, compel the city to issue a State Environmental Protection Act (SEPA) Determination of Significance and require an EIS.

The location of the proposed subdivision is unique both in its specific characteristics and its physical setting. These unique characteristics and physical setting are important factors that influence why the current subdivision proposal is likely to have significant adverse environmental impacts.

The proposed subdivision application is severely flawed. Objective and comprehensive assessments suitable to this unique site and setting must be completed to address these flaws before an informed consideration of any subdivision proposals can be made.

Because of this site's unique specific characteristics and unique physical setting, and because of the subdivision application's profound flaws, the city does not have the accurate, sufficient, and objective information it needs to identify and assess potential significant adverse impacts.

Moreover, the application materials themselves indicate that the proposal is likely to have a significant adverse impact on the natural environment, the built environment, and public health and safety.

I ask the city to protect our public interest and prevent harms to the community. Please require an Environmental Impact Statement, so that any permit decisions are based on a full understanding of the risks to the environment and to public safety.

Sincerely,

Carol Stieger
223 E Bakerview Rd, Apt 404
Bellingham, WA 98226

crstieger@comcast.net

Aven, Heather M.

From: noreply@cob.org on behalf of City of Bellingham <noreply@cob.org>
Sent: Tuesday, April 9, 2024 7:17 PM
To: G.Proj.Wood at Viewcrest
Subject: Public Comment -Michelle Watts
Attachments: Public Comment - 658.pdf



City of Bellingham

Public Comment

Entry Details

NAME	Michelle Watts
CHOOSE TOPIC	The Woods at Viewcrest
COMMENT OR TESTIMONY	Please consider deterring this project. Protect mud bay
EMAIL	michelle_is_me@hotmail.com
DATE	4/9/2024