

## Aven, Heather M.

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**From:** Lisa Berry <amoco320@gmail.com>  
**Sent:** Wednesday, April 10, 2024 4:09 AM  
**To:** Bell, Kathy M.  
**Cc:** Sundin, Steven C.  
**Subject:** Mud Bay Cliffs

Some people who received this message don't often get email from amoco320@gmail.com. [Learn why this is important](#)

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

Begin forwarded message:

To: Kathy Bell, Senior Planner, [kbell@cob.org](mailto:kbell@cob.org)  
Steve Sundin, Senior Planner, [ssundin@cob.org](mailto:ssundin@cob.org)  
Blake Lyon, Planning & Community Development Department Director, [bglyon@cob.org](mailto:bglyon@cob.org)  
Planning & Community Development Department  
210 Lottie Street  
Bellingham, WA 98225  
From: Lisa Berry 320 Viewcrest Rd. Bellingham, WA 98229  
April, 09, 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.

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.**
  - 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.

Sincerely,  
Lisa Berry

**Aven, Heather M.**

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**From:** noreply@cob.org on behalf of City of Bellingham <noreply@cob.org>  
**Sent:** Thursday, April 11, 2024 4:54 PM  
**To:** G.Proj.Wood at Viewcrest  
**Subject:** Public Comment -Ross Marquardt  
**Attachments:** Public Comment - 659.pdf



## City of Bellingham

### Public Comment

## Entry Details

<b>NAME</b>	Ross Marquardt
<b>CHOOSE TOPIC</b>	The Woods at Viewcrest
<b>COMMENT OR TESTIMONY</b>	<p>A. 1. The developers state that "enhanced treatment" will be done to storm water runoff entering the bay from the development. That special treatment is undefined, and therefore meaningless.</p> <p>2 At the same time the developers state "No waste materials will be present in this stormwater." A wonderful statement, but I am not aware of any filtration system that removes 100% of particle and chemical matter in street runoff. Grand statements of impossible perfection arouse suspicion</p> <p>3, The water area below the development is estuarine, and therefore has severe inflow restrictions, per the Department of Ecology. The developers do not meet the DOE</p>

standards.

B. That the geotechnical/geohazard testing was done only in the dry months (06/30-07/01/2020) is astonishing! How can a valid assessment of stability be made for house and streets without doing a wet season analysis in this plot of generally shallow soil?

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EMAIL

marquardtr9@hotmail.com

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DATE

4/11/2024

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**Aven, Heather M.**

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**From:** Diana Ambauen <drameade@gmail.com>  
**Sent:** Friday, April 12, 2024 4:10 PM  
**To:** Bell, Kathy M.  
**Subject:** Mud Bay

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

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

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

I am very concerned about this proposed development.

Thank you,  
Diana Ambauen-Meade

**Aven, Heather M.**

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**From:** Nabbefeld, Kurt D.  
**Sent:** Friday, April 12, 2024 5:31 PM  
**To:** Bell, Kathy M.  
**Subject:** FW: Mud Bay Cliffs

Hi Kathy –

Please add to the record, unless Fiona already forwarded.

Thanks!

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**Kurt Nabbefeld, Development Services Manager,  
SEPA Responsible Official**

City of Bellingham  
Planning and Community Development  
Tel: (360) 778.8351  
Email: [knabbefeld@cob.org](mailto:knabbefeld@cob.org)



*The Bellingham Plan will help shape the city's future. Learn how you can take part!*  
[The Bellingham Plan | Engage Bellingham](#)

***My incoming and outgoing email messages are subject to public disclosure requirements per RCW 42.56***

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**From:** Robert Ball <martyfrenich@gmail.com>  
**Sent:** Sunday, March 31, 2024 3:35 PM  
**To:** Grp.PL.Planning Mail (planning@cob.org) <planning@cob.org>  
**Subject:** Mud Bay Cliffs

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

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

My voting family of 3 is very strongly opposed to the proposed Mud Bay Cliffs development. This is a very fragile area that must be protected.

Robert Ball, Jane Gordon-Ball, Rachel Gordon-Ball  
507 Lyla Lane  
Bellingham, WA 98225  
[martyfrenich@gmail.com](mailto:martyfrenich@gmail.com)  
360 393 0559

**Aven, Heather M.**

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**From:** Pam Bartling <pambarcake@gmail.com>  
**Sent:** Friday, April 12, 2024 11:04 AM  
**To:** Bell, Kathy M.  
**Subject:** Mud Bay Cliffs Information Request

[You don't often get email from pambarcake@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.

Hello,

Please accept this email as my request to receive via email all notices regarding the Woods at Viewcrest applications. I live in the neighborhood and would like to be kept informed.

Thank you,

Pam Bartling



## Aven, Heather M.

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**From:** Rebecca Brownlie <beckybrownlie@me.com>  
**Sent:** Friday, April 12, 2024 12:50 PM  
**To:** Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.  
**Subject:** Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

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

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

[Download Attachment](#)  
[Available until May 12, 2024](#)

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

Firstly, you will see the letter below that some lovely person composed of which I wholeheartedly endorse and agree with.

But from my personal standpoint, I would like to emphatically implore you all to consider what it means to lose complex ecosystems. We have many plans to increase tree cover in Bellingham, restore, waterways, etc., My question is why do we destroy these important areas in the first place and then retroactively try to create something which is a inevitably worse? We actually know better.

Unfortunately, it is always about profit and private property and ownership, BUT perhaps we could think differently as a community. Perhaps we could think what it would mean to have this beautiful area intact for future generations, and for the diverse species it supports. Your children might say one day "Wow, my mom or dad saved this amazing habitat!"

Until we appreciate that money and profit cannot replace the intrinsic beauty and worth of the natural world nor the importance of mature trees and wild spaces and the ecosystems that they support (including people), we are headed for a very sad and complicated future. In the end, we are only as good as the land on which we stand. Once it's gone, it's gone in our lifetime.

Please enjoy the short video I composed after a talk given by Resources, the Forest Watch and Million Trees organizations in Bellingham. What we do today matters, and you are the people who can change the course of how things play out.

[Click to Download](#)

Video.mov  
0 bytes

(The nice person's letter I endorse)

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**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.
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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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- 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.
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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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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,

Rebecca Brownlie

Sent from my iPhone

**Aven, Heather M.**

---

**From:** Matt Larson <matt@propelbikecoaching.com>  
**Sent:** Saturday, April 13, 2024 11:28 AM  
**To:** Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.  
**Subject:** Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

You don't often get email from matt@propelbikecoaching.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:** Matthew Larson, 606 Clark Rd, Bellingham, WA 98224

**April 6, 2024**

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

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

I live within a quarter mile of the proposed housing development, *The Woods at Viewcrest*. I understand that Bellingham is likely to grow significantly in the coming decades and recognize the need for more housing in the Bellingham area to accommodate this growth. That said, growth and development that fails to recognize the importance of our natural environment (one of the main reasons that people are moving to Bellingham) is both short-sighted and self-defeating. I strongly urge you to order that an environmental impact statement be required for this development in order to assure that objective standards, which follow both state and local regulations, are followed. The specific reasons for this request are contained below.

In order 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, I request that 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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**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,

Matthew WS Larson

14 April 2024  
4668 Fieldston Rd.  
Bellingham, WA. 98225

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

As owner of Clark's Point, just to the south of this proposed development called The Woods at Viewcrest, I am concerned about how this will affect the ecosystem in various ways.

As noted in the application notice, the proposed The Woods at Viewcrest contains critical areas including wetlands, fish and wildlife habitat conservation areas, and geologically hazardous areas with their associated buffers. There are a lot of concerns about this.

Certainly, an **Environmental Impact Statement** should be required, then evaluated and implemented accordingly.

Until now this acreage to the south of Viewcrest has been a **forested wildlife corridor** between Clark's Point, 100 Acre Woods, Chuckanut Village Marsh, and the Chuckanut Mountains. That will change if this development is approved.

Thirty-four years ago (1990) my family placed our 76+ acre peninsula into a conservation easement with the Whatcom Land Trust with 4 home sites about 1 acre each and the rest in a wildlife reserve. Mind you, we had the peninsula surveyed to show a possible 105 home sites. We chose to preserve it instead. Our love of the trees and wild spaces won over big financial profits.

The news is so full of environmental disasters, including the loss of habitat and the scientific proof of climate change which is affecting the world in so many ways. More floods, more draughts, extreme weathers, melting glaciers leading to more and more deaths of humans, plants, and animals. Obviously, this project is small scale and still, every tree matters. Saving one tree at a time is what we can encourage and support.

Maybe they could change the name of this development, if it actually is approved to: The Woodless at Viewcrest or to take after the title, Sleepless in Seattle, call it: Woodless in Viewcrest. I find it so ironic that places where habitat is destroyed are given the names of the species that once lived there.

Sometimes doing the right thing takes financial sacrifices. My guess is the Jones family does not NEED to destroy these woods. I would love if they would reconsider the proposal and go back to the original 4 lots that have been plotted along Viewcrest. That would be a gift: for the forest, the wildlife and all the habitat, the human neighbors, the Mud Bay Cliffs, the wetlands, and the bay, etc. Then the name The Woods at Viewcrest could be justifiable.

**I strongly recommend that you decide an EIS is necessary, as well as consider promoting land stewarding with habitat protection whenever possible. Please keep this wildlife corridor intact!**

Thank you for all your hard work in working with all of us: concerned humans, environmental activists, land owners, developers, etc. and please don't forget the plants and animals.

Sincerely,

Patrice Clark  
360-739-8390

**Aven, Heather M.**

---

**From:** Lauren Ranz <lrranz@icloud.com>  
**Sent:** Sunday, April 14, 2024 6:01 PM  
**To:** Bell, Kathy M.  
**Subject:** Protect Mud Bay Cliffs

You don't often get email from lrranz@icloud.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.

**Aven, Heather M.**

---

**From:** Lauren Ranz <lrranz@icloud.com>  
**Sent:** Sunday, April 14, 2024 6:14 PM  
**To:** Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.  
**Subject:** Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

You don't often get email from lrranz@icloud.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](mailto:kbell@cob.org)

Steve Sundin, Senior Planner, [ssundin@cob.org](mailto:ssundin@cob.org)

Blake Lyon, Planning & Community Development Department Director, [bglyon@cob.org](mailto:bglyon@cob.org)

Planning & Community Development Department

210 Lottie Street

Bellingham, WA 98225

**From:** Lauren Rasmussen Ranz

**April 14, 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.

**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,

Lauren Rasmussen Ranz

**To:** Kathy Bell, Senior Planner, [kbell@cob.org](mailto:kbell@cob.org)

Steve Sundin, Senior Planner, [ssundin@cob.org](mailto:ssundin@cob.org)

Blake Lyon, Planning & Community Development  
Department Director, [bglyon@cob.org](mailto:bglyon@cob.org)

Planning & Community Development Department

210 Lottie Street

Bellingham, WA 98225

**From:** Don and Beth Snyder, 401 Arbutus Pl., Bellingham, WA  
98225

**April 14, 2024**

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

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

Even though the following is taken from a "form letter", please do not discount our input because we have taken the time to carefully study the opinions and concerns of the experts who are making valuable input into this important and critical planning effort.

It is important for the property owners to be able to develop their property but it is even more critical for the Bellingham and Whatcom County community to take action to ensure that the wildlife, trees and vegetation

living in this space and adjacent or near this area are not affected by this development. This is an incredibly diverse area that provides a rich habitat to some amazing animals in which the community has easy access to observe and enjoy. We have lived in this area for almost six years and we have been amazed how both locals and visitors respect and carefully preserve this wonderful and unique area.

We request the planning department to apply rational restraint to the maximum number of properties that are developed in this area. The steep slope into Mud Bay should be protected from any type of pollution and impact to any animals, trees and vegetation; especially the tacit permission to remove trees, trim trees, remove vegetation and/or upset the habitat in this critical area after a development is completed. (This action can readily be seen in the Edgemoor neighborhood in recent years.) It seems that a protection line/barrier at the very top of the ridge must be agreed to and implemented. This could be done in such a way to eliminate the need for any type of storm water diversion or handling. However, we don't know what this suggestion entails. For this reason, we believe that the only way to make informed decisions is for the property owners and the planning department obtain an Environmental Impact Statement. The value of this tremendous community natural resource requires this if development is to occur.

Please consider the following input to your planning process. This information is the result of careful and

expert study and consideration and is supported by many residents concerned about protecting this wonderful natural resource for generations to come.

### **Expert Recommendation: (we support)**

We 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.

**We 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,

*Don and Beth Snyder*

## Aven, Heather M.

---

**From:** Dan Wakeland <dhwakeland@hotmail.com>  
**Sent:** Monday, April 15, 2024 1:47 PM  
**To:** Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.  
**Subject:** 'the woods at viewcrest' proposed development - EIS requirement needed

Some people who received this message don't often get email from dhwakeland@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: Dan Wakeland – 525 Bayside Rd, Bellingham, WA 98225

April 15<sup>th</sup>, 2024

**Subject: At a minimum require an EIS for the Proposed Subdivision on Mud Bay Cliffs or better yet, reject the proposal outright.**

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

The proposed development and subdivision of the 4 lots on Viewcrest under the name: *The Woods at Viewcrest* (which I might point out is oxymoronic, since most of the trees would be removed) should be rejected based on several factors, but at a minimum a complete EIS should be made of the property and the surrounding impacted areas should the planning department consider moving this proposal forward.

The proposed subdivision (of 4 current lots into 38 proposed lots, with up to 152 housing units) would impose significant adverse impacts to the environment of not just the property in question, but to a wide swath of surrounding lands. In addition to these adverse impacts, the developer's application materials are flawed. The significant adverse impacts of a development on this property, 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 would 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 landslides, 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. The proposed “run off” solution that the developer described in a meeting was comical at best and shows why an EIS should be required
- **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 because 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.
- **Natural native Oysters:** Oysters have been reintroduced into the bay below and are highly sensitive to environmental degradation, which this development and continual stormwater run off would cause.
- **And on a nonscientific note** – the high-density development as proposed is in ugly contrast to the surrounding mature neighborhood in which it would be located.

### Traffic Safety and Level of Service.

- Traffic safety issues have been well documented in this neighborhood, 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. 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).
- Based on the sheer number of proposed lots, at full capacity the Viewcrest and Chuckanut roads would see an additional 300+ cars almost daily, if not more. Roads such as Fieldstone, Hawthorne, Linden, and Willow would see many commuters traveling through trying to bypass Viewcrest, 16<sup>th</sup> and Chuckanut at key hours as drivers attempt to avoid other traffic. Old Samish and 32<sup>nd</sup> Street would also see significant impacts.
- Any public works changes that would be required, such as traffic lights, street widening, bridge rebuilding, lighting, sidewalks and the like that would be needed for the entire area, including Viewcrest and Chuckanut drive to accommodate the huge influx of additional traffic must be paid for by the developer, not the taxpayer – should this move forward.

**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 any 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 winds 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. Its a mature and symbiotic environment, take away part, and the rest will suffer greatly.
- 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 (or 300+ additional cars) - 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 this application as it stands. Considerable additional research to examine the adverse impacts of such a subdivision and development is required.

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 wildlife 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.**

To be frank, had the owners and developers moved forward with a home on each of the existing 4 lots, this would most likely not have become the major issue it has become, the cliffs, estuary, woodland habitat, marine habitat, traffic issues, stormwater runoff, etc. wouldn't be an issue and the environment and residence could have lived harmoniously.

Thanks for your time and consideration,

Sincerely,

*Dan Wakeland*

**Aven, Heather M.**

---

**From:** Adelaide Connelly <adelaidemconnelly@gmail.com>  
**Sent:** Tuesday, April 16, 2024 11:57 PM  
**To:** Bell, Kathy M.  
**Subject:** Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

You don't often get email from adelaidemconnelly@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 23 and have lived in this area for a few years. As a college student, I am learning about preserving our fragile ecological resources for future generations. With all of the dangers to mankind that losing precious wildlife habitat poses, I find it hard to believe that the city would allow a developer to strip the cliffs above Chuckanut Bay of the trees in order to install another subdivision without even an environmental impact study.

The proposed subdivision, Woods at Viewcrest, will negatively impact the area and could cause lasting damage to the flora and fauna that draw visitors to our area. We need to protect our wild spaces and vistas and preserve all that we can from developers. There are less fragile areas for developers to make their millions on.

Please do what you can to prevent them from destroying this beautiful and essential natural habitat hub. At the very least, they should have to do the Environmental Impact Study that all others are expected to do before building above a wetland. I ask that this letter be entered into the public record so that it will be viewed by those designated to make the choice in this matter. Thank you for your time.

Sincerely,  
Adelaide Connelly



**Aven, Heather M.**

---

**From:** MIKE INGRAM <mbaing@aol.com>  
**Sent:** Tuesday, April 16, 2024 12:01 PM  
**To:** Bell, Kathy M.  
**Subject:** Woods at Viewcrest Application

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

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

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

Thank You,

Michael Ingram, MD

1617 Fairhaven Ave.

Bellingham, WA 98229

E-mail: mbaing@aol.com

Cell: 425-971-9812

Kathy Bell, Senior Planner, [kbell@cob.org](mailto:kbell@cob.org)  
Steve Sundin, Senior Planner, [ssundin@cob.org](mailto:ssundin@cob.org)  
Blake Lyon, Planning & Community Development Department Director,  
[bglyon@cob.org](mailto:bglyon@cob.org)  
Planning & Community Development Department  
210 Lottie Street  
Bellingham, WA 98225

David Gell  
1913 Fairhaven Ave  
Bellingham, WA 98229

17 April 2027

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

I live on Fairhaven Ave, which provides access from Chuckanut Drive to the beach at the north end of Mud Bay. I am very concerned that development of The Woods at Viewcrest would significantly and adversely affect the environment of the bay.

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

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 has geohazards including landslides, erosion and seismic hazards. These hazards are apparent in the boulders and rocks that have accumulated on the shore of Mud Bay.

The site of this proposed subdivision is an important habitat hub containing mature shoreline woodlands and wetlands habitats. It connects the Clarks Point and Chuckanut Marsh and Bay Open Space to the larger, protected Wildlife Network. This habitat provides food and shelter for the Post Point Colony of Great Blue Herons. Juvenile salmon rely on clean water this habitat to travel from Chuckanut Creek into the bay.

The habitat is at risk for degradation due to the proposed development by increasing storm runoff and surface runoff from the developed area.

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.

The Stormwater Management Plan is incomplete, lacking key required plan elements. 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 and address the harmful impacts development will cause. It does not include a sufficient wildlife inventory.

The Geotechnical Investigation and Geohazards 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. 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.

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 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.

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

A handwritten signature in cursive script, appearing to read "David A. Gell".

David A. Gell

**Aven, Heather M.**

---

**From:** Lori Rubens <LVANRUBENS@COMCAST.NET>  
**Sent:** Wednesday, April 17, 2024 9:06 AM  
**To:** Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.  
**Cc:** Ivanrubens@comcast.net  
**Subject:** An EIS is necessary for proposed Jones development

You don't often get email from Ivanrubens@comcast.net. [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:** Lori Rubens

621 Linden Rd

Bellingham, WA 98225

**April 17, 2024**

**Subject: AN EIS is necessary as the proposed Jones Development fails to identify Mud Bay as a pocket estuary**

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

I am a resident of Edgemoor and a frequent visitor to Mud Bay as well as Chuckanut Bay over many decades. I first visited Chuckanut Bay as a kayaker and hold that marine environment close to my heart. I am soon to become a Salish Sea Steward through the Skagit County Marine Resources Committee.

I fear that the proposed Jones development will severely harm the ecosystem of Mud Bay and place neighboring Chuckanut Bay at risk of loss of marine life. Furthermore, it appears that the City has failed to appreciate the legal jeopardy that may haunt the City if the development proceeds as planned.

The City funded a study of pocket estuaries in 2006 with the conclusion that the Chuckanut Creek estuary has a high level of function for salmonid species, shellfish, winter water fowl, bald eagles, great blue heron, mustelids, and general wildlife. There was documented spawning of salmon, including Coho. Extensive mudflats associated with softshell clams were noted to provide abundant winter waterfowl habitat. In another study, endangered Chinook salmon have been observed in Chuckanut Creek. More recently, volunteers associated with the Whatcom Marine Resource Committee have seeded Olympia oysters as part of native oyster restoration with success in southeast Mud Bay. In the 2006 study, freshwater inputs to Mud Bay have been documented to include not only Chuckanut Creek and Chuckanut Marsh but also runoff from surrounding bluffs.

The City has invested extensive resources to provide public access to Chuckanut Bay Shorelands. The tidelands as well as adjacent Chuckanut Creek Marsh and Chuckanut Village Marsh and Woodstock Farm are public lands, owned by the City.

There are multiple severe and irreversible risks to the ecosystem of Mud Bay and likely to adjacent Chuckanut Bay if the City allows the development to proceed as proposed. Water quality will deteriorate from expected runoff and storm water outflow. The results will include likely further acidification, worsening eutrophication from fertilizers, worsening coliform counts, introduction of tire toxins (6PPD-q), and introduction of herbicides and pesticides. Increased sedimentation from sloughing of the bluffs will further reduce water quality. The net result will be loss of marine life and habitat for fish, shellfish, birds, and small mammals. Adjacent Chuckanut Bay will be affected by the worsening water quality, resulting in decrease in eelgrass, forage fish, marine invertebrates, seabirds, eagles, and marine mammals.

There are current and proposed legal protections for salmonid species. The EPA protects endangered Chinook salmon. The EPA is in the process of proposing guidelines to protect Coho salmon from tire toxins. Multiple organizations, including the Northwest Straits Commission, the Salish Sea Institute, and the Whatcom Marine Resources Committee are working to protect the Salish Sea, including the function of pocket estuaries. Washington State University has a Shore Stewards program to help restore estuaries for salmonid species. The City, however, appears to be of 2 minds with respect to Mud Bay—on the one

hand investing resources to protect it and on the other allowing a developer to essentially ruin it.

The pocket estuary and tidelands of Mud Bay are public lands. If the City allows the proposed development to proceed as planned, the function of Mud Bay as a wildlife habitat will cease to exist and the City will have surrendered public lands with essential ecological functions to the developer. An EIS is thus essential to analyze likely effects of the proposed development.

Sincerely,

*Lori V Rubens, MD*

**Aven, Heather M.**

---

**From:** Samantha Ernest <sam.n.ernest3@gmail.com>  
**Sent:** Thursday, April 18, 2024 2:44 PM  
**To:** Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.  
**Subject:** Require an Environmental Impact Statement for Mud Bay Cliffs

Some people who received this message don't often get email from sam.n.ernest3@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 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,

*Samantha N*

## Aven, Heather M.

---

**From:** Samantha Ernest <SErnest@Assumption.School>  
**Sent:** Thursday, April 18, 2024 2:47 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 sernest@assumption.school. [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,

As a science educator, I am continually discussing the reality and challenges of climate change in our local environment. The solution has been clear for 100 years– preserve wildlife. We cannot live out of balance with the wilderness around us without causing billions of people to die. We have to extend this call to protect the 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.

## 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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- **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,  
Mrs. Ernest

Michael Ingram, MD

April 17, 2024

Kathy Bell City Senior Planner, Steve Sundin Senior Planner and Blake Lyon Department Director

Planning and Community Development Department

210 Lottie St.

Bellingham, Wa. 98225

My name is Michael Ingram. As a resident of Chuckanut Village in Bellingham, adjacent to Chuckanut (Mud) Bay, I am writing to express concerns regarding the proposed "Woods at Viewcrest" development. My concerns regard the hydrologic consequences of the proposed development & storm water drainage system on Chuckanut (Mud) Bay & surrounding properties, especially during winter storms. As noted in Richard Horner's expert review summarized by letter on 3/18/24, a complete assessment & analysis of the hydrologic consequences regarding the volume & routing of stormwater drainage of this project has not been conducted. Mud Bay, which will receive this stormwater drainage, is a Washington Dep't of Ecology Category I estuarine wetland. In addition to reasons cited by others, a full Environmental Impact Assessment is warranted to assess the potential environmental harm resulting from this development as proposed.

Our home sits directly to the east of the pocket estuary located to the north of Fairhaven Avenue where it terminates at the city park on Chuckanut Bay. This affords us a birds eye view of the bay, estuary & marsh. On multiple occasions, during winter storms, (frequently coinciding with winter King tides), we have witnessed rising waters flooding the City Park shoreline into the estuary/marsh northeast of Chuckanut Bay including the western terminus of Fairhaven Avenue. During & after winter storms, the volume of storm water drainage from Chuckanut Creek combined with runoff from the existing Sea Pines, Briza & View Crest neighborhoods & 100 Acre Woods watershed to the N.E. fills the bay with a volume of water runoff that exceeds the drainage capacity through the open trestle of the BNSF causeway (the sole path of egress from the Bay). See photos attached below. I also have several videos documenting the extent of recent stormwater events on the Mud Bay estuary which I would be happy to share. Addition of increased volume of surface water storm drainage resulting from this proposed development will likely worsen the potential for flooding of the park, existing roads & adjacent estuary/marsh.

Evidence of currently existing storm damage to the Mud Bay shoreline is evident to even a casual observer along the north end of the bay adjacent to the shoreline of the proposed project. Here, one can already see signs of significant shoreline erosion from high water levels & wave action during these same winter storms. Rising storm water drainage volume can only intensify & increase the rapidity of shoreline degradation.

It is incumbent on city planners to evaluate the potential for adverse consequences as a result of this development being constructed & completed as proposed. A significant



increase in volume & resulting adverse consequences of surface/storm water drainage during construction & post completion will predictably result from this development as proposed. These considerations have not been adequately assessed & addressed in the project's application & supporting documents. A full Environmental Impact statement should be completed to the evaluate the potential consequences of this development.

Sincerely,

Michael Ingram, MD

1617 Fairhaven Avenue

Bellingham, WA 98229

[e-mail-mbaing@aol.com](mailto:e-mail-mbaing@aol.com)

Cell-425-971-9812



**Above: Photo from deck of 1617 Fairhaven Ave. Wetland flooded, terminus of Fairhaven Avenue & City Park entrance in distance.**

**Below: Security Cam photo 1617 Fairhaven Avenue: Terminus of Fairhaven Avenue & City Park entrance in distance**



**Aven, Heather M.**

---

**From:** Anna Theobald <annatheobald@comcast.net>  
**Sent:** Thursday, April 18, 2024 3:23 PM  
**To:** Bell, Kathy M.  
**Subject:** Woods at Viewcrest

You don't often get email from annatheobald@comcast.net. [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,  
Anna Theobald  
annatheobald@comcast.net



**Aven, Heather M.**

---

**From:** Stephanie Brigham <sfbrigham@icloud.com>  
**Sent:** Friday, April 19, 2024 6:58 AM  
**To:** Bell, Kathy M.  
**Subject:** Request to receive via email all notices regarding the Woods at Viewcrest applications.

You don't often get email from sfbrigham@icloud.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.

Regards,  
Stephanie Brigham  
222 Middlefield Rd  
Bellingham, WA

**Aven, Heather M.**

---

**From:** Rebecca Bunn <rebecca.bunn@gmail.com>  
**Sent:** Friday, April 19, 2024 9:25 PM  
**To:** Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.  
**Subject:** Please require an EIS for the Proposed Subdivision on Mud Bay Cliffs

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

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

Please require 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.

This forested property with wetlands performs essential ecosystem functions by filtering water before it reaches the Mud Bay which reduces nutrient loads into the bay, and by moderating water flow which slows erosion into the bay. The intact forests and low amount of human activity stabilizes the slope which helps prevent slides.

Furthermore, this property is a refuge for birds and animals including great blue herons which have a rookery in the nearby wetland. Fragmentation and increased human activity would reduce the value of this property for those birds and animals.

Beyond these services, the beach along mud bay is a free beach access site that is within city limits, offering a recreation opportunity for everyone. Another subdivision along the beach would further diminish its recreational value.

These are only a few examples of the ways in which the proposed development could cause unintended long-term damage. Again, please require an Environmental Impact Statement, which will help the city make permit decisions based on a full understanding of the risks to the environment, and to public safety.

Sincerely,

Rebecca Bunn

3625 18th St, Bellingham WA, 98229

**Aven, Heather M.**

---

**From:** Michael Kaufman <mjkesq007@gmail.com>  
**Sent:** Friday, April 19, 2024 7:03 AM  
**To:** Bell, Kathy M.  
**Subject:** Mud Bay Cliffs

You don't often get email from mjkesq007@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.

**Aven, Heather M.**

---

**From:** susan Laine <susanklaine@gmail.com>  
**Sent:** Friday, April 19, 2024 8:27 AM  
**To:** Bell, Kathy M.  
**Subject:** Woods at Viewcrest

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

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

Sent from my iPad

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

**Aven, Heather M.**

---

**From:** Debra Olson <debcat@mac.com>  
**Sent:** Friday, April 19, 2024 7:15 AM  
**To:** Bell, Kathy M.  
**Subject:** Mud Bay Flats

You don't often get email from debcat@mac.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."

Sent from my iPhone  
Debra A. Olson  
503.333.4350



**Aven, Heather M.**

---

**From:** Patrice <clarkpatrice@gmail.com>  
**Sent:** Friday, April 19, 2024 7:05 AM  
**To:** Bell, Kathy M.  
**Subject:** woods at viewcrest notices

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Hi Kathy

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

Thank you.

Patrice Clark

Sent from my iPhone

**Aven, Heather M.**

---

**From:** Margot Schenet <margot\_schenet@msn.com>  
**Sent:** Friday, April 19, 2024 10:59 AM  
**To:** Bell, Kathy M.  
**Subject:** Woods at Viewcrest project

[You don't often get email from margot\_schenet@msn.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.

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

Thank you.

Margot Schenet

margot\_schenet@msn.com

Sent from my iPhone

**Aven, Heather M.**

---

**From:** Joseph Taraska <jmtaraska@gmail.com>  
**Sent:** Friday, April 19, 2024 7:03 AM  
**To:** Bell, Kathy M.  
**Subject:** Mud Bay Cliffs/Woods At Viewcrest

You don't often get email from jmtaraska@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 as my request to receive by email all notices regarding the proposed development of the Woods At Viewcrest. Thank You Joseph Taraska [jmtaraska@gmail.com](mailto:jmtaraska@gmail.com)

**Aven, Heather M.**

---

**From:** Allan Buehler <abuehler@comcast.net>  
**Sent:** Saturday, April 20, 2024 7:37 PM  
**To:** Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.  
**Subject:** Subject: Require an EIS for the Proposed Subdivision on Mud Bay Cliff

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

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

**From:** Allan and Donna Buehler  
3514 Chuckanut Ave  
April 20 2023

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 require 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 is too large for the buildable land. I understand that the developer's application materials are flawed in substantive ways.

The "low hanging fruit and middle hanging fruit" for development has all been used. It behooves us to be even more cautious with remaining lands.

We believe we are in the midst of a significant environmental shift that is unpredictable. Hence the drought emergency predicted just a few days in April! Who can know if atmospheric rivers will return and wash out roads and narrow lanes in the development. Stormwater management would be overwhelmed and damage the fragile nature of Mud Bay.

Agencies have gone out of their way to protect the bay, requiring us to spend thousands on new septic systems and limiting shoreline activity to protect juvenile salmon.

When the development mitigations start to fail, will the City bail them out? The plan is not a "belt and suspenders" solution, but rather a "probably don't need a belt anyway" solution.

This development should not go forward and certainly not without an EIS.

Sincerely,

Allan and Donna Buehler  
[abuehler@comcast.net](mailto:abuehler@comcast.net)

**Aven, Heather M.**

---

**From:** Jamie K Donaldson <jamiek@netidea.com>  
**Sent:** Saturday, April 20, 2024 3:44 PM  
**To:** Bell, Kathy M.; Lyon, Blake G.; Sundin, Steven C.  
**Cc:** jamie K Donaldson  
**Subject:** Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

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

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

My friend and former COB Mayor, Seth Fleetwood, mentioned to me not long ago that while he was a member of the Greenways Committee, the city was interested in acquiring what is now called “The Woods at Viewcrest” property for its intrinsic value as part of the unique and sensitive ecosystem that makes up Mud Bay and surrounding areas. Recognizing its worth and in order to add this property to already-protected, public and privately-owned lands adjacent, the city reached out to the landowner(s) to gauge their interest in selling it to the city. Unfortunately, none existed.

I raise this point first, because it shows that without doubt, COB has a strong interest in what happens in and around Mud Bay, as it should. Now that there is a large subdivision and development proposal under consideration, at the very least, **the city must protect against the significant adverse impacts and risks to the environment that “The Woods at Viewcrest” proposes by requiring an Environmental Impact Statement (EIS) be prepared for this project.**

I am grateful to local concerned citizens who have taken the time to study the proponent’s proposal in detail along with City Planners, and who have sought and attained scientific expertise to weigh in on the multiple risks that the current proposal continues to present, despite multiple embellishments following requests for more information by the city. Thankfully, I do not need to list all the reasons why this proposal requires an EIS as this information is being provided to the city in detail by many others.

Please protect our public interest and prevent harms to the community by requiring 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,

Jamie K. Donaldson

1133 13th Street Apt A

Bellingham, WA 98225

**Aven, Heather M.**

---

**From:** crstieger@comcast.net  
**Sent:** Saturday, April 20, 2024 1:11 AM  
**To:** Bell, Kathy M.  
**Subject:** Request email notify of all Woods at Viewcrest application notices

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

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

Dear Ms. Bell,

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

Thank you,

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

crstieger@comcast.net

**Aven, Heather M.**

---

**From:** dstieger@comcast.net  
**Sent:** Saturday, April 20, 2024 2:08 PM  
**To:** Bell, Kathy M.  
**Subject:** Request email notify of all Woods at Viewcrest application notices

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

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

Dear Ms. Bell,

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

Thank you,

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

dstieger@comcast.net

April 19, 2024

Kathy Bell, Senior Planner

Steve Sundin, Senior Planner

Blake Lyon, Planning & Community Development Director

Earth Day Greetings,

I have “met” you in city council and Silver Beach neighborhood association meetings. I am glad you are DEDICATED to the preservation of DIVERSE, untouched land. And I DEDUCE that you love the wild spaces and wildlife that DEFINE Bellingham. This is why most of us live here!

To prevent DAMAGE to publicly-owned spaces intertwined with Mud Bay Cliffs, and to safeguard our community against severe subdivision DEVELOPMENT risks, I ask, or rather, emotionally DEMAND, that you require an EIS for *The Woods at Viewcrest*, the proposed subdivision on the mature woodlands and wetlands of Mud Bay Cliffs.

The proposed DEBACLE of a DESTRUCTION would impose significant adverse impacts to the DELICATE environment. The adverse impacts, coupled with substantive application flaws, compel the city to issue a State Environmental Protection Act (SEPA) DETERMINATION of Significance and require an EIS.

Particularly at risk and what keeps me DOGGEDLY sleepless at night are the Great Blue Herons.





The Post Point Colony on the Mud Bay Estuarine Wetlands **DEPENDS** on this estuary to feed their young. Heron Colony inhabitants fled its previous home near Chuckanut Bay as a result of **DEVELOPMENT** and thus **DEVASTATION**.

It is **DETRIMENTAL** that you enact 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,

*Kendra Wagner*

3700 Alabama Street #219

Bellingham, WA 98229

**Aven, Heather M.**

---

**From:** Linnea Fredriksson <linneaf18@gmail.com>  
**Sent:** Sunday, April 21, 2024 8:35 PM  
**To:** G.Proj.Wood at Viewcrest  
**Subject:** Woods at Viewcrest

You don't often get email from linneaf18@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:** Linnéa Fredriksson

**April 21, 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.

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,

*Linnea Fredriksson*

**Aven, Heather M.**

---

**From:** Gary Ranz <geranz@icloud.com>  
**Sent:** Sunday, April 21, 2024 9:53 AM  
**To:** Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.  
**Subject:** The Woods at Viewcrest

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

Kathy Bell, Senior Planner, [kbell@cob.org](mailto:kbell@cob.org)

Steve Sundin, Senior Planner, [ssundin@cob.org](mailto:ssundin@cob.org)

Blake Lyon, Planning & Community Development Department Director, [bglyon@cob.org](mailto:bglyon@cob.org)

Planning & Community Development Department

210 Lottie Street

Bellingham, WA 98225

Re: The Woods at Viewcrest · The issue of Public Safety

As a concerned citizen and resident of an affected area; it is incumbent upon me to comment upon the above referenced proposed development. I am aware that some of my neighbors have enumerated the COB ordinances that have required variances so i will not belabor those points.

I feel that the information filed by the Jones family and their applicant is either out of date, ill timed or completely ignores the SEPA checklist requirements I have concerns about public safety because the traffic study filed with initial permit application is outdated and needs to be updated because it was performed during the Covid 19 pandemic. As you know schools had suspended in person classes, traffic was diminished due to employees not commuting in person to work and a general diminishment of personal travel in order to avoid contact with infected populace.

The traffic signal at Chuckanut Drive, Hawthorne and 12th Street presents a public safety concern at numerous times during weekdays. The 12th Street bridge and sidewalk are also an area of public safety concern. Ingress and egress is of a concern during an emergency situation for the intersection is the main entrance to and exit from the Edgemoor neighborhood from the north.. The traffic now becomes congested during certain times of the week days. I am sure you are also aware that the Viewcrest Rd., Fieldston Rd.(from Hawthorne Rd. To Fieldston Rd.), Linden Rd. , Broad Rd., Briar Rd., Cross St., 16th St. and Bayside Rd. neighborhoods have no sidewalks and our residents routinely walk in the roadways with their dogs and families. I have even encountered a senior mens' group that numbered more than ten walking in the middle of Viewcrest Rd. in front of our

home. Furthermore; the aforementioned roads have sub standard and varying widths with no easements in order to add any public sidewalks.

I am currently aware of at least 25 residents who routinely walk their dogs in the roadway on Viewcrest Rd. The 38 new plats that are proposed will definitely impact traffic on our neighborhood streets (especially Viewcrest Rd.) and thus increase the risk of more adverse interactions between cars, pedestrians and their furry friends.

Lastly, I respect the right of a property owners to develop their land but that development needs to follow all the environmental standards and public safety ordinances that are extant contemporaneously with the proposal. Easements and variances are not the province of a responsible development and should be investigated for their full impacts before development; therefore, an EIS should to be required.

Sincerely yours,

Gary Edward Ranz

204 Viewcrest Rd.

Bellingham, WA. 98229



**Aven, Heather M.**

---

**From:** rh <huntrv@gmail.com>  
**Sent:** Sunday, April 21, 2024 9:34 AM  
**To:** Bell, Kathy M.; ssunlin@cob.org; Lyon, Blake G.  
**Subject:** Mud Bay Cliffs preservation.

Some people who received this message don't often get email from huntrv@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](mailto:kbell@cob.org)

Steve Sundin, Senior Planner, [ssundin@cob.org](mailto:ssundin@cob.org)

Blake Lyon, Planning & Community Development Department Director, [bglyon@cob.org](mailto:bglyon@cob.org)

Planning & Community Development Department

210 Lottie Street

Bellingham, WA 98225

**From:** Ron Hunt 639 Hunters Pointe Dr. Bellingham, Wa 98225

**April 21, 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.

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.
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- **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.
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  - 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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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.
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- 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,

*Ron Hunt*

**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:** Philip and Judith Shantz, 1921 Rainier Ave., Bellingham, WA 98229

**Date:** April 18, 2024

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

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

We wish to add our names and comments to those of the concerned neighbors seeking the City's diligence in making determination on the application of The Woods at Viewcrest to develop a 38 acre parcel above the Mud Bay tidelands.

We are very grateful for the work done by Protect Mud Bay Cliffs to provide our neighborhood with a more comprehensive understanding of the legalities and the risks of the proposed development. With that in mind, and because we are in general agreement with all of it, we will be copying the major points of their suggested letter below.

We would also like to emphasize that emergency services to addresses south of Fairhaven Parkway are already substantially impeded at the 12<sup>th</sup> Street bridge during school start and dismissal times. Any other access to the south neighborhoods consists of awkward and time-consuming work-arounds. Adding the population of a fairly substantial development would only serve to increase the risk to public safety.

We have lived in Chuckanut Village for 43 years and, during that time, have become involved when developers have proposed land uses that we believed would be extremely detrimental to the natural and human environment. In addition, over those years most of our neighbors have made substantial contributions in time, research, public engagement and funding to ensure that those living, building and recreating in this sensitive ecosystem, are following the principals of land use that protect against environmental degradation.

Because of our own activities, both walking and kayaking in Mud Bay, we have had ample opportunity to observe what the results of wind and wave action are on unprotected sandstone cliffs over the years. Individual features are slowly carved out over time and simply fall away.

Because we believe that constructing 38 luxury homes (with the possibility of increasing that to as many as 152 dwelling units, according to current State law), we request the following:

Excerpted from information and findings provided by PMBC:

**That the City acts to prevent harms to Bellingham's publicly-owned spaces connected to Mud Bay Cliffs by issuing a SEPA Determination of Significance and requiring an Environmental Impact Statement (EIS) be prepared for The Woods at Viewcrest.**

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.

## **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. The existing mature woodland acts as a protective buffer for wildlife (both resident and sheltering), and for the community. **(See previous comment about soil erosion of unprotected sandstone cliffs.)**

## **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.



- **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. **(See previous point about impediments to emergency services.)**
  - 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.
- 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 of how the remaining trees in the proposed narrow 200-foot "buffer" along the shoreline would be affected by adjacent tree removal.
- 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

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,

*Phillip E Shantz    Judith E Shantz*

**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:** Paul Troutman,  
1125 Chuckanut Dr.

Bellingham, WA 98229

**(April 21, 2024)**

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

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

My name is Paul Troutman and I have been a resident of Bellingham since 1978. The last 25 years of which I have been a resident of Chuckanut Village and Chuckanut Bay. I have served as a Recreational Representative on the Whatcom Marine Resources Committee and have served as a champion for the Olympia Oyster restoration project in North Chuckanut Bay (Mus Bay) I have also been a member of the Wa. Sea Grant Green Crab Team in N. Chuckanut Bay.. To put it plainly, I have devoted a good part of my life in attempting to restore Mud Bay to a healthy marine estuary environment. We have been making good strides in that effort and I was so saddened to hear of the proposed Jones property development and the impacts that it would have on all the progress that we have made in attempting to restore this gem of a marine estuary that falls within the City of Bellingham..This is truly an invaluable resource that should be protected and for those reasons as stated below the City should require the developer to produce an environmental impact statement on the proposed development. I

ask you to prevent harm 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 Environment 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,

*Paul Troutman)*



**MT. BAKER GROUP  
WASHINGTON STATE CHAPTER SIERRA CLUB**

**Co-Chairs**

Rick Eggerth  
Ned Vasquez

**Vice-Chair**

Richard May

**Secretary**

Lynn Colson

**Treasurer**

Ron Colson

**At Large**

Judith Akins/Alexandra Gayek/John Yearsley

[mtbaker@washington.sierraclub.org](mailto:mtbaker@washington.sierraclub.org)



April 22, 2024

Steve Sundin, Senior Planner  
Kathy Bell, Senior Planner  
Planning and Community Development Dept.  
City of Bellingham  
City Hall, 210 Lottie Street  
Bellingham, WA 98225  
Via Email to: [woodsvc@cob.org](mailto:woodsvc@cob.org)

Re: Notice of Application for The Woods at Viewcrest

Dear Mr. Sundin and Ms. Bell:

As the largest and oldest grass roots environmental protection organization on the planet, Sierra Club maintains local groups encompassing regions of each State. The Mt. Baker Group (of the Washington State Chapter) includes about 3,500 members and supporters in San Juan, Skagit, and Whatcom Counties, with over 2,100 in Whatcom County alone. In this letter we offer comments on the proposal to develop 38 acres on the Mud Bay Cliffs directly above Chuckanut Bay and ask that the City require a complete Environmental Impact Statement before any project permission is considered.

The planning documents thus far leave us concerned that this project will create harmful environmental impacts to various critical areas, including wetlands on the development site, forested land, and the Mud Bay estuary, as well as to wildlife in the area. For starters, the steep slope of the site increases the likelihood of considerable erosion and

sediment created during and after construction (and which will intensify during rain events). Such erosion could imperil not only construction on the site itself, but also existing residences, as well as the estuary itself, and animals living in it and nearby. Sediment suffocates aquatic organisms, clogs critical habitat and oxygen reserves in interstitial substrate spaces, and conducts toxic pollutants. The plan as written fails to adequately address how to contain this sediment.

The current plan also fails to adequately account for contaminants in the stormwater coming from the inevitable new hard surfaces like streets, roofs, and lawns. One of the main threats to salmon and orca are toxic contaminants from stormwater runoff. Mud Bay estuary is a Category I estuarine wetland that is critical habitat for dozens of aquatic organisms, including salmon, a species already severely imperiled in the Salish Sea. Runoff into Mud Bay from this development will exacerbate contributions of fossil fuels, tire wear particles (like the especially deadly, to salmon at least, 6PPD-Q), metals, nutrients, pesticides, and fecal bacteria. Unique and ever-more-rare wetlands like Mud Bay must be protected because of the critical ecological functions that they perform. The proposed development will undoubtedly add to the amount of contaminants entering the Salish Sea.

Moreover, building several dozen homes on such steep slopes will remove badly needed tree cover, and will elevate the risk of landslides and rockfall hazards. Preliminary review indicates numerous areas that should be avoided entirely, while other should be set back to mitigate geologic risks. These risks should be fully evaluated and the risks objectively assessed well before any construction is considered.

For these reasons at least, this project as planned will contribute to the continual degradation of not only Mud Bay, including the cliffs above it, but also the Salish Sea, further damaging a complex and delicate marine ecosystem already suffering due to continual thoughtless landscape modifications. *Therefore, Sierra Club asks that a SEPA threshold Determination of Significance be issued, and that a complete Environmental Impact Statement be required to adequately evaluate all potential impacts to this area.*

Thank you.

Sincerely,

Rick Eggerth  
Co-Chair, Mt. Baker Group/Sierra Club

**Aven, Heather M.**

---

**From:** Tracie Johannessen <tracie.johannessen@gmail.com>  
**Sent:** Monday, April 22, 2024 9:55 AM  
**To:** Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.  
**Subject:** Require an EIS for the Proposed Subdivision on Mud Bay Cliffs

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

**To:** Kathy Bell, Senior Planner, [kbell@cob.org](mailto:kbell@cob.org)

Steve Sundin, Senior Planner, [ssundin@cob.org](mailto:ssundin@cob.org)

Blake Lyon, Planning & Community Development Department Director, [bglyon@cob.org](mailto:bglyon@cob.org)

Planning & Community Development Department

210 Lottie Street

Bellingham, WA 98225

**From:** Tracie Johannessen

**April 22, 2024**

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

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

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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,

*Tracie Johannessen*

**Aven, Heather M.**

---

**From:** noreply@cob.org on behalf of City of Bellingham <noreply@cob.org>  
**Sent:** Monday, April 22, 2024 5:32 PM  
**To:** G.Proj.Wood at Viewcrest  
**Subject:** Public Comment -Karl W. Mueller  
**Attachments:** Public Comment - 663.pdf



## City of Bellingham

### Public Comment

## Entry Details

<b>NAME</b>	Karl W. Mueller
<b>CHOOSE TOPIC</b>	The Woods at Viewcrest
<b>COMMENT OR TESTIMONY</b>	<p>Besides the possible impacts of this development project on a unique coastal feature that have already been raised by others, there is another concern that may not be garnering quite as much attention, but one that certainly merits it in an Environmental Impact Statement, and that is the fact that Mud Bay has been colonized by invasive European green crab. Please refer to the following link: <a href="https://wsg.washington.edu/egc-chuckanut/">https://wsg.washington.edu/egc-chuckanut/</a></p> <p>Marine invasive species, such as the European green crab, often thrive in disturbed, human-impacted shoreline settings. A good example of this is the Lummi Sea Pond within</p>



Lummi Bay, up the coast from Mud Bay. And like Mud Bay, it was there, not long ago, that just a few European green crabs were discovered in the enclosed sea pond. Within a couple of years, tens of animals turned into thousands of them, sparking a statewide emergency response to the invader (<https://wdfw-egc-hub-wdfw.hub.arcgis.com/>). Given Mud Bay's enclosure by the current railroad berm, trestle, and underpass, the embayment is already at high risk of entraining larvae and containing European green crab. An Environmental Impact Statement is not only warranted for the other concerns raised, but it certainly would provide additional information about the development's influence on the invasion of European green crab in Mud Bay, and whether or not possible negative impacts might lead to additional invasion threats outside of the bay.

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**EMAIL**

karlwmueller@msn.com

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**DATE**

4/22/2024

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To: Steve Sundin, Senior Planner  
Kathy Bell, Senior Planner  
Planning and Community Development Dept.  
City Hall, 210 Lottie St.  
Bellingham, WA 98225

Transmitted Via Email to: [woodsvc@cob.org](mailto:woodsvc@cob.org)

22 April 2024

**RE: Notice of Application for The Woods at Viewcrest**

Dear Mr Sundin and Ms. Bell,

Thank you for taking the time to consider our comments on the proposal to develop the 38-acres on the Mud Bay Cliffs overlooking Chuckanut Bay. Due to the unique and sensitive habitat along with the steep terrain and problematic soils, ***we request that the City of Bellingham issue a SEPA threshold Determination for Significance and require a full Environmental Impact Statement.*** This will allow a full analysis of the environmental impacts and ensure that any development that occurs here does not have negative impacts.

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We mobilize people in Northwest Washington to build just and thriving communities and to protect the land, water and climate on which we all depend. Our priority programs include Protecting the Salish Sea, Freshwater Restoration, Climate Action, and Fighting Pollution—all critical issues affecting our region. Our North Sound Waterkeeper is also a member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has thousands of supporters in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

Upon reviewing the planning documents, we are concerned that the proposed project may lead to adverse environmental impacts to on-site wetlands, forested land, and the Mud Bay estuary. Due to the steep terrain of the site, there may be a considerable amount of erosion and sediment created during initial land disturbance as well as during and after construction. The plan as written does not adequately address how this sediment will be contained particularly as rain events get more intense. Sediment clogs the gills of aquatic organisms, clogs the interstitial spaces in substrate that is critical habitat and oxygen reserves for aquatic species, and are conduits for toxic pollutants.

The current plan also does not adequately treat the increase in contaminated stormwater coming from the newly created hard surfaces such as streets, roofs, and lawns that will contribute fossil fuels, tire wear particles (6PPD-Q), metals, nutrients, pesticides, and fecal bacteria. Mud bay estuary, the receiving water body of this stormwater, is a Category I estuarine wetland that is critical habitat for a myriad of aquatic organisms including the keystone species salmon. These unique, and now rare wetlands, need to be protected at all costs because of the enormous ecological functions that they perform. One of the main threats to salmon and orca whales are toxic contaminants from stormwater runoff. This development may exacerbate the amount of contaminants entering the Salish Sea.

Additionally, building several dozen homes on these steep slopes may elevate the risk of landslides and rockfall hazards. Preliminary geologic review has indicated numerous areas that should be avoided entirely, and other areas that will require setbacks to mitigate geologic risks. These risks should be fully evaluated.

This development project as planned will likely contribute to the continual degradation of the Salish Sea through the loss of tree cover and increase of impervious surfaces compounded by the steep terrain and hard soils. All aspects and levels of the marine ecosystem are suffering because of the continual alterations that we make to our landscape, especially those in sensitive places like this one. ***For this reason we request that a complete Environmental Impact Statement be performed to adequately evaluate all the potential impacts to this area.***

Sincerely,

Kirsten McDade  
RE Sources  
North Sound Waterkeeper

**Aven, Heather M.**

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**From:** noreply@cob.org on behalf of City of Bellingham <noreply@cob.org>  
**Sent:** Monday, April 22, 2024 11:43 AM  
**To:** G.Proj.Wood at Viewcrest  
**Subject:** Public Comment -Coreen Schmidt  
**Attachments:** Public Comment - 661.pdf; Woods at Viewcrest public comment\_Coreen Schmidt.docx



## City of Bellingham

### Public Comment

## Entry Details

<b>NAME</b>	Coreen Schmidt
<b>CHOOSE TOPIC</b>	The Woods at Viewcrest
<b>COMMENT OR TESTIMONY</b>	<p>Dear Ms. Bell, Mr. Sundin and Mr. Lyon,</p> <p>I am writing to request that the City of Bellingham require a full Environmental Impact Statement for the proposed Woods at Viewcrest development. I firmly believe that this development, as currently proposed, would impose significant adverse impacts on this unique and sensitive ecosystem and on our community for the following reasons:</p> <p><b>ECOLOGICAL DAMAGE</b> – The proposed development will replace existing forestland with new impervious surfaces. This will reduce rainfall infiltration on the site and significantly impact groundwater recharge, particularly due</p>

to the proposed homesites and access driveway on the crest of the ridgeline where most infiltration occurs. This reduction in groundwater recharge will not only adversely impact the known wetlands on the site but will also harm the remaining trees and native vegetation, resulting in additional tree and vegetation loss over time. This is especially problematic given recent trends toward hotter, dryer summers, which have already stressed native trees and resulted in reduced foliar moisture in our forests. At a time when the City's Urban Forest Management Plan is seeking to increase canopy cover in our community, this runs counter to the City's climate resilience and sustainability goals. The developer's proposal fails to address the impacts of reduced groundwater recharge on their required tree retention plans and on the regulated wetlands within the site.

In addition, the developer's tree retention plan does not realistically reflect the extent of tree removals that will be required to actually implement the required infrastructure to build the new roadway and access drives. Due to the steep topography of the site, large retaining walls will be required, and the associated over-excavation that will be necessary in order to construct the walls (including tie-backs and construction access) does not appear to be accurately accounted for in the developer's proposal. Our native conifers have a shallow root system and rely both on extensive structural root systems and the support of their neighbors for stability. Once construction begins, more trees will almost certainly be lost due to impacts that are not yet accounted for. Lastly, there is little chance that additional tree removals will not result from residents of the new homes seeking to maximize views and/or reduce the risk of windfall from the remaining trees.

**HABITAT LOSS** – Living near the proposed development, I can attest that the site is an important refuge for myriad wildlife, including

deer, coyotes, bobcats, eagles, falcons, and herons, just to name a few that we have frequently seen. The proposed development site was designated as an Important Habitat Hub in the City's recent Wildlife Corridor Analysis and provides a key linkage between other protected wildlife hubs including Clark's Point, the Chuckanut Bay Open Space and the Chuckanut Mountain preserve. Preserving wildlife corridors is of critical environmental importance and has been shown to be a public priority within Bellingham. The development of the Woods at Viewcrest will be detrimental to our local wildlife communities and was not given serious consideration in the developer's Wildlife Habitat Assessment.

In addition, the Mud Bay estuary is important for juvenile salmon and other marine species, and significant public investment has been made to restore this critical habitat. The developer's Stormwater Management Plan, proposing discharge into the Mud Bay estuary, is incomplete and leaves open the potential for significant adverse impacts will occur in this sensitive and important marine environment.

**TRAFFIC SAFETY** – The most likely ingress/egress route to the proposed development is via Viewcrest Road, which even at current traffic volumes has significant safety issues. Viewcrest Road is narrow and does not currently have sidewalks, and it has very limited horizontal and vertical sight distance at multiple locations. Viewcrest Road is also the primary walking route for people accessing the Hundred Acre Woods and the Clark Point Viewpoints, as well as for neighbors who live along the street. Adding significantly more traffic to this already unsafe road condition is a recipe for accidents.

In addition, the stop-controlled intersection at Chuckanut Drive has poor sight distance for turning vehicles (specifically northbound left turns from Viewcrest onto Chuckanut and westbound left turns from Chuckanut onto

Viewcrest), especially on weekends when traffic volumes on Chuckanut Drive are higher. The developer's proposal fails to address these significant public safety concerns that would result from the increased traffic from the Woods at Viewcrest.

**PUBLIC SAFETY** – The forested ridge that runs east west through the middle of the proposed development currently provides a vital wind buffer from the prevailing SE winds for the Clark Road neighborhood, where I live. Our area is in a unique microclimate that is prone to frequent and strong windstorms, which are only getting more intense due to climate change. In addition, most of the homes along Clark Road are built among large mature fir trees, which provide valuable shade in the summer, and which contribute to the City's urban forest canopy and climate resiliency goals. The proposal for homesites and an access road directly atop the ridge will result in significant tree loss and will significantly reduce the wind buffer for those of us who live on Clark Road. Because the trees along Clark Road have grown to maturity with that existing buffer protecting them from the SE storms, the increased wind forces that would result from the loss of that buffer will almost certainly lead to trees coming down during storms.

Case in point: during the violent windstorm in mid-January 2021, which came uncharacteristically out of the SW where we have no mitigating buffer, a large 30" fir tree came crashed down from our neighbor's yard, falling across our backyard and narrowly missing another neighbor's house. It was terrifying and caused significant damage, but if had it come down in a SE wind it would have come directly through our house. The potential damage from the development of the ridgeline within the Woods at Viewcrest could have potentially catastrophic impacts on our neighbors on Clark Road, and the developer's proposal fails to consider this potential impact

or propose revisions to mitigate it.

Thank you for taking the time to listen to the community's concerns over the proposed Woods at Viewcrest development. I hope that the City of Bellingham will act in the interest of the public and our environment and require a full Environmental Impact Statement for this flawed project.

Best regards,  
Coreen and David Schmidt

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**FILES**

Woods at Viewcrest public comment\_Coreen Schmidt.docx

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**EMAIL**

coreenschmidt@gmail.com

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**DATE**

4/22/2024

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**Aven, Heather M.**

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**From:** Joseph Trimble <josephtrimble@gmail.com>  
**Sent:** Monday, April 22, 2024 1:48 PM  
**To:** Lyon, Blake G.; ssundin@cob.or; Bell, Kathy M.  
**Subject:** Require an EIS for the Proposed Subdivision on Mud Bay Cliffs  
**Attachments:** Mud Bay Flats Letyter.docx

**Importance:** High

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

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

Dear Mr. Lyon and Ms. Bell,

Attached please find my letter requesting you require an Environmental Impact Statement for the proposed subdivision on Mud Bay Cliffs, so that any permit decisions are based on a full understanding of the risks to the environment and to public safety.

Thank you for your attention and consideration.

--Joseph

*Joseph E. Trimble, PhD  
648 Clark Road  
Bellingham, WA 98225  
U.S.A.*

**To:** Kathy Bell, Senior Planner, [kbell@cob.org](mailto:kbell@cob.org)

Steve Sundin, Senior Planner, [ssundin@cob.or](mailto:ssundin@cob.or)

Blake Lyon, Planning & Community Development Department Director, [bglyon@cob.org](mailto:bglyon@cob.org)

Planning & Community Development Department

210 Lottie Street

Bellingham, WA 98225

**From:** Joseph E. Trimble

648 Clark Road

Bellingham, WA 98225

**22 April. 2024**

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

Dear Mr. Lyon and Ms. Bell,

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.
- **Bald Eagles** Over the years I have seen bald eagles roosting in the trees at Mud Bay. On a few occasions I have seen them swoop down to pluck fish from the bay.
- **Salmon.** Juvenile salmonids rely on clean water and roosting in the trees 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.

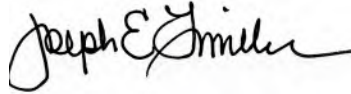
Because of this site’s unique specific characteristics and unique physical setting, and because of the subdivision application’s profound flaws, the city does not have the accurate, sufficient, and objective information it needs to identify and assess potential significant adverse impacts.

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.**

Very sincerely,

A handwritten signature in black ink that reads "Joseph E. Trimble". The signature is written in a cursive style with a large, prominent "J" and "T".

Joseph E. Trimble

## Aven, Heather M.

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**From:** Paul Vandenberg <[vandenberg.paulj@gmail.com](mailto:vandenberg.paulj@gmail.com)>  
**Sent:** Monday, April 22, 2024 9:53 AM  
**To:** Bell, Kathy M.; Sundin, Steven C.; Lyon, Blake G.  
**Subject:** Comment on application for proposed residential subdivision known as The Woods at Viewcrest

Some people who received this message don't often get email from [vandenberg.paulj@gmail.com](mailto:vandenberg.paulj@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,

My home is in the Edgemoor neighborhood close to the Woods at Viewcrest (herein, Viewcrest Woods). I have concerns about the proposed development of Viewcrest Woods, as expressed here:

It's obvious to anyone who routinely spends time near Viewcrest Woods – e.g., walking along Viewcrest Rd. to the 100-Acre Wood, walking the shoreline trail along Mud Bay, kayaking Chuckanut Bay - that Viewcrest Woods and the adjacent marine environment are ecologically rich and complex. Observations of wildlife and aquatic life use this area are common and numerous. As such, it should also be obvious that risks associated with the proposed development will tend to be high and not easily mitigated.

The level of effort put into characterizing the features of this potentially impacted environment, assessing with reasonable accuracy the risks to those features, and designing feasible risk mitigation measures, should be commensurate with its rare, high functioning, yet fragile ecosystem. By extension, any development of Viewcrest Woods implementing a project design that does not incorporate the findings of an objective, comprehensive Environmental Impact Statement (EIS, under WA SEPA) would likely have significant impacts on the environment, and on public health and safety. In that scenario, there would be obvious impacts, but also impacts that could not be foreseen; and some of those would be irreversible. The stakes are high, both for environmental integrity and the public interest.

It can be assumed that the City already understands this. For example, in its 2021 Wildlife Corridor Analysis, Viewcrest Woods is designated as an "Important Wildlife Area", including "Important Wildlife Corridors" that provide terrestrial wildlife connectivity with Clark's Point on one side, and on the other side with woodlands and Chuckanut Bay Marsh below Sea Pines Rd.

Further, in its 2013 Shoreline Master Program (Findings section), the City has stated:

*The Bellingham City Council concurs with the State Legislature in finding that "the shorelines of the state are some of the most valuable and fragile natural resources and that there is great concern throughout the state relating to their utilization, protection, restoration and preservation. In addition, it finds that ever increasing pressures of additional uses are being placed on the shorelines necessitating increased coordination in the management and development of shorelines of the state. The legislature further finds that much of the shorelines of the state and the uplands adjacent thereto are in private ownership; that unrestricted construction on the privately owned or publicly owned shorelines of the state is not in the best public interest; and therefore coordinated planning is necessary in order to protect the public interest associated with the shorelines of the state while, at the same time, recognizing and protecting private property rights consistent with the public interest. There is, therefore, a clear and urgent demand for a planned, rational and concerted effort, jointly performed by federal, state and local governments, to prevent the inherent harm in an uncoordinated and piecemeal development of the state's shorelines.*

The WA Department of Ecology (Ecology) has designated Mud Bay as having Category 1 (high priority) resource value under its wetlands classification system. The City's interpretive signage at the Chuckanut Bay Shorelands trail – prepared in coordination with Ecology - demonstrates the City's awareness and understanding of, and its commitment to preserving this ecologically significant marine environment. Here is selected text from that signage:

*Chuckanut Bay has been identified as one of the most valuable remaining shoreline ecosystems to protect in our region because the bay, its salt marsh, and the Chuckanut Creek Watershed are still mostly intact.*

*Chuckanut Bay is home to two unique and valuable habitats, a pocket estuary and a salt marsh. Salt marshes and estuaries are some of the most productive ecosystems on earth. Both are influenced by fresh water running off the land and salt water brought in by the tides. They contain high levels of nutrients which support a large diversity of plant and animal life.*

*Forage fish like surf smelt and sand lance hatch from eggs laid among the grains of sand. These small fish feed herons, salmon, even whales. Juvenile salmon are found in Chuckanut Creek Marsh and Estuary, where they grow, adapt to salt water, and prepare for their years in the ocean. Crabs, shrimp and clams spawn here. Some will spend their entire life in this estuary. Migratory birds depend on estuaries to rest and refuel during their long journeys.*

This ecosystem has already been heavily impacted by the railroad and prior urban development of adjacent uplands, causing pollution, erosional sedimentation, etc. Development of Viewcrest Woods as proposed could be devastating to the already fragile Mud Bay/Chuckanut Bay complex.

Requiring an EIS under WA SEPA for the Viewcrest Woods application is the only effective path for the City to demonstrate consistency with, and commitment to its Wildlife Habitat Plan, Shoreline Master Program, and the public display at the Chuckanut Shorelands trailhead, including its understanding of the importance of the Chuckanut Bay ecosystem and its intention to preserve and enhance it.

Thank you for taking this comment into consideration.

Barbara Zielstra  
316 Willow Ct. N.  
Bellingham, WA 98225  
360.941.315

April 20, 2024

Re: Mud Bay Cliffs

Kathy Bell, Sr. Planner, [Kbell@cob.org](mailto:Kbell@cob.org)  
Steve Sundin, Sr. Planner [Ssundin@cob.org](mailto:Ssundin@cob.org)  
Blake Lyons, Planning Director, [bglyon@cob.org](mailto:bglyon@cob.org)  
Kurt Nabbefeld, SEPA planner

Dear Planners,

I am familiar with Mud Bay as I frequently kayaked there, enjoying the boulder strewn shoreline and the quiet waters leading to Chuckanut Bay.

Having reviewed many of the documents relating to the proposed development, I am concerned that we – you, the city’s planners and we, the citizens – do not have enough information to truly assess the impacts of this proposed development to the existing natural environment (the estuarine wetlands, the forest, wildlife corridors) and to public safety (landslides, instability of the steep slopes, erosion, increased traffic on narrow existing streets). And, if we don’t have adequate assessments, we cannot have protective mitigations.

I have read letters from experienced professionals that question the application’s stormwater management plan with its potential impacts to Mud Bay estuarine wetlands and the geohazard of development, including deforestation of the steep cliffs. I do not have the scientific background to make such assessments, but I will rely on such experts as Richard Horner ([bit.ly/PMBC-Horner](http://bit.ly/PMBC-Horner)), Lyndon Lee ([bit.ly/PMBC-Lee\\_w\\_CV](http://bit.ly/PMBC-Lee_w_CV)), and Dan McShane ([bit.ly/PMBC-McShane](http://bit.ly/PMBC-McShane)) to outline the information needed before any true impacts to the cliff, the forest, the estuarine wetlands can be assessed and mitigated.

As Dr. Lee writes, “I have observed that tidally influenced salt to freshwater transition areas like the one that exists in Mud Bay are certainly among the rarest types of waters/wetlands in the Sound Lowlands/Salish Sea complex or for that matter, on the west coast of the North American continent from Kodiak Island to the U.S./Mexico border.” This rare place is now at risk. Bellingham Planning Dept. needs to recognize this treasure and ensure its protection when/if development of the forested cliffs occurs.

Later, Dr. Lee writes “The existing lack of hydrologic modeling and comparisons of pre and post development conditions for the proposed Woods at Viewcrest development is a glaring omission in the current basis of design/plan set and the narratives that support the proposed development.” Given such inadequate assessments and mitigations provided in applicant’s application, I ask that you -our planners, representing all of us- act responsibly and require an Environmental Impact Statement before moving forward with the “Woods at Viewcrest” application.

Sincerely,  
Barbara Zielstra

Cc: Mayor Kim Lund  
City Councilmembers