

## Aven, Heather M.

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**From:** PL - thebellinghamplan@cob.org  
**Sent:** Monday, April 29, 2024 11:55 AM  
**To:** Bell, Kathy M.; Sundin, Steven C.  
**Subject:** FW: Woods at Viewcrest

FYI

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**From:** Luella Heese <luheese@gmail.com>  
**Sent:** Wednesday, April 24, 2024 3:26 PM  
**To:** PL - thebellinghamplan@cob.org <thebellinghamplan@cob.org>  
**Subject:** Woods at Viewcrest

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

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With planting and saving forested areas within the city as the purpose of the Bellingham urban Forestry management plan, has any engagement been made with the city planners Kathy Bell, Steven bounding, and Blake Lyon concerning the forested 37.7 acre site located generally in the 300 Block of Viewcrest Road to be developed with 38 single family lots or now perhaps more. I would encourage you to get permission to take a walk in these woods. Climate change is real and Mother Earth needs all the help it can get. Sincerely, Luella Heese



May 30, 2024

Planning and Community Development Dept.  
Att: Steve Sundin and Kathy Bell, Senior Planners  
City Hall, 210 Lottie Street.  
Bellingham, WA 98225  
Transmitted via email to: [woodsvc@cob.org](mailto:woodsvc@cob.org)

RE: Notice of Application for The Woods at Viewcrest

Dear Steve and Kathy,

Whatcom Million Trees Project has closely followed this 38-acre proposed project over the past year. We have personally walked around the site and all along Mud Bay. We've examined aerial imagery of the site as well as early-2023 lidar mapping to determine where some of the tallest trees in the Edgemoor neighborhood exist within there. We also have read virtually all documents submitted by all parties.

Due to the unique and sensitive habitat on land and in the estuary below, the threatened forestland by the proposed maxed-out development, stormwater issues, and the steep terrain and problematic soils, **we request that the City of Bellingham issue a SEPA threshold Determination for Significance for this proposed project 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.

Thank you for considering this letter.

Sincerely,

Michael Feerer, Executive Director (he/him)  
360-319-1370 voice/text  
**Whatcom Million Trees Project**  
<https://whatcommilliontrees.org>

## Aven, Heather M.

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**From:** Deborah Wessell <wessell@live.com>  
**Sent:** Wednesday, May 29, 2024 3:57 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.

From: Deborah Wessell, 2504 Victor St, Bellingham WA 98225

May 2, 2024

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

As a Bellingham resident, I'm asking you to 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. We need to protect the city-owned spaces connected to Mud Bay Cliffs, and safeguard our mature woodlands and wetlands from the well-know risks of subdivision developments.

Two issues compel the city to issue a State Environmental Protection Act (SEPA) Determination of Significance and require an EIS. First, the proposed subdivision would create significant environmental damage. And second, the developer's application materials are flawed in substantive ways. Please see the points below for details.

### A. Environmental Damage

1. The 2021 City of Bellingham *Wildlife Corridor Analysis* designates this property, which consists of rare mature shoreline woodlands and wetlands habitat, as one of the only unprotected Important Habitat Hubs in south Bellingham. This hub links two others – 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.
2. Significant landslide, erosion and seismic hazards, which are sensitive to development disturbances, exist throughout the site.
3. Climate change has brought increasing gale intensity, and this mature woodland acts as a protective buffer for wildlife and for the community.
4. Most stormwater drainage from this site flows directly into the Mud Bay Estuarine Wetlands, whose health is already threatened by existing city stormwater outlets.
5. 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. The colony fled its previous home near Chuckanut Bay as a result of subdivision development, and significant public investment has been made to protect the colony at its new Post Point nesting location.
6. Juvenile salmonids rely on clean water and safe passage through the Mud Bay Estuarine Wetlands, Chuckanut Village Marsh, and Chuckanut Creek. Again, significant public investment has been made to restore these habitats for salmon.

### B Severe Application Flaws

**Aven, Heather M.**

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**From:** Charles Redell <charlesredell@gmail.com>  
**Sent:** Wednesday, May 29, 2024 4:17 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 charlesredell@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

**Aven, Heather M.**

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**From:** char waller <chardotw@gmail.com>  
**Sent:** Monday, April 29, 2024 8:13 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 chardotw@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)

**From:** Charlotte Waller

**(Date):** 4/29/2024

**Subject: Require an EIS for the Proposed Subdivision on Mud Bay Cliffs, or better yet, please just stick with the original 4 house development on Viewcrest Rd.**

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

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

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### **Physical Setting**

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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.**

**How about just sticking with the original 4 houses along Viewcrest and call it a day! Adding more than the original proposal will have multiple negative and regrettable consequences.**

Sincerely,

*Charlotte Waller*

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*Char Waller*

# Edgemoor Neighborhood Association

ENABoard@EdgemoorNeighborhood.com

April 30, 2024

Blake Lyon, Planning & Community Development Department Director  
Kurt Nabbefeld, Development Services Manager & SEPA Responsible Official  
Kathy Bell, Senior Planner  
Steve Sundin, Senior Environmental Planner  
City of Bellingham  
210 Lottie Street  
Bellingham, WA 98225  
Via Email

Copy Via Email:  
Mayor Kim Lund  
Bellingham City Council

**Re: The Woods at Viewcrest**

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

The *Edgemoor Neighborhood Association* (ENA) Board has reviewed the application materials for *The Woods at Viewcrest* subdivision. Based on our review of these documents, the ENA Board is confident that the proposal is likely to have a significant adverse impact on the environment. Accordingly, we formally request that the city issue a SEPA threshold Determination of Significance and prepare an environmental impact statement (EIS) as required under RCW 43.21C.030(2)(c).

Many of these adverse impacts and unacceptable risks to public safety were highlighted in ENA's March 5, 2021 letter to Senior Planner Kathy Bell, a copy of which is attached. The comments contained within the March 5, 2021 ENA letter are hereby incorporated.

We are familiar with the public comment package submitted by *Protect Mud Bay Cliffs* (PMBC), including expert opinion letters from Richard Horner, Ph.D., Dan McShane, L.E.G, and Lyndon Lee, Ph.D., as well as the letter from PMBC's attorney Bricklin & Newman. ENA agrees with PMBC's well-documented arguments that *The Woods at Viewcrest* application materials are fundamentally flawed, do not provide sufficient information for a legitimate environmental review, and do not fully comply with guidelines and recommendations adopted by the city, the state, or federal

governments. Additionally, these application materials do not meet Best Available Science or Best Management Practices standards.

Further, *The Woods at Viewcrest* application does not meet the spirit, intent, and requirements of the Edgemoor Neighborhood Plan and Edgemoor Neighborhood Zoning Map. The application is not consistent with the adjacent Neighborhood Character, does not respect the Open Space guidelines to develop the peak southeast of the intersection of Viewcrest Road and Fieldston as a viewpoint, or the integration of a play lot on this parcel, and fails to consider the public safety aspects of Edgemoor's narrow roads with limited sight distances. The Prerequisite Consideration for "Improvement to Fieldston and Willow Roads as neighborhood collectors" is completely ignored.

ENA's March 5, 2021 letter to Senior Planner Kathy Bell highlights the adverse environmental impacts to the Earth, Air, Water, Plants, Animals, Noise and Transportation elements. ***When considered in totality***, these adverse impacts will certainly impose "more than a moderate adverse impact on environmental quality."

The ENA Board's conclusion that this proposal is likely to have a significant adverse impact on the environment is founded on the factors detailed in WAC 197-11-794 and WAC 197-11-330.

Based on these factors and the adverse environmental impacts detailed in our March 5, 2021 letter, it is clear that there is a ***reasonable likelihood*** that the Jones Edgemoor Subdivision on Viewcrest Road will impose ***more than a moderate adverse impact*** on environmental quality in view of the ***physical location of the project***, when the ***adverse impacts are considered in totality***, and when the severity of the ***potential impacts*** is factored in.

Therefore, we request that you issue a Determination of Significance (DS) and require that an EIS be conducted.

The Edgemoor Neighborhood Association Board appreciates the opportunity to provide public comment on the Jones Edgemoor Subdivision proposal. Please include this letter in the public record.

Thank you for considering our request to require an environmental impact statement based on the significant impacts this project will impose on multiple elements of the environment.

Sincerely,  
The Edgemoor Neighborhood Association Board

# Edgemoor Neighborhood Association

ENABoard@EdgemoorNeighborhood.com

March 5, 2021

Kathy Bell, Senior Planner  
City of Bellingham Planning & Community Development  
Via Email: kbell@cob.org

Copy via Email:

Steve Sundin, City of Bellingham Senior Environmental Planner: ssundin@cob.org  
Bellingham Mayor Seth Fleetwood: mayorsoffice@cob.org  
Bellingham City Council: ccmail@cob.org

Re: Jones Edgemoor Subdivision on Viewcrest Road

Dear Kathy,

The *Edgemoor Neighborhood Association* (ENA) Board has reviewed the documents for the 44-lot Jones Edgemoor Subdivision on Viewcrest Road that were presented by AVT Consulting during the required Neighborhood Meeting on February 24, 2021.

Based on our review of these documents, the ENA Board is confident that the proposal presented during the Neighborhood Meeting is likely to have a significant adverse impact on the environment, and we formally request that an environmental impact statement be completed as required under RCW 43.21C.030(2)(c).

The SEPA Environmental Checklist, when submitted by the applicant, must address environmental impacts to a variety of elements, including Earth, Air, Water, Plants, Animals, Energy & Natural Resources, Environmental Health, Land & Shoreline Use, Housing, Aesthetics, Light & Glare, Recreation, Historic & Cultural Preservation, Transportation, Public Services, and Utilities.

- 1) **EARTH**: Regarding the Earth element, the December 31, 2009 *Geologic Feasibility Investigation* prepared by Pacific Surveying & Engineering (PSE) concluded that:
  - a. In summary, geologic hazards at the site exist and include landslide, erosion and seismic hazards.

- b. [T]he subject property contains areas with steep topography and development will have to consider site-specific engineering designs and mitigative measures for portions of the property.
- c. Future development of the site could impact the current hydrologic condition... Changes in hydrology can alter the probability, frequency and magnitude of mass wasting (landslide) activity.
- d. Possible evidence of historic mass wasting (landslide) activity was also observed at the eastern portion of the property.
- e. Geotechnical investigations will need to assess erosion, landslide potential, and seismic hazards and subsurface conditions. Future development may potentially impact slope stability and surface erosion.
- f. Field observations suggest that the soils on the project site have a relatively low susceptibility to erosion in an undisturbed state because of dense vegetation, but that alteration of these conditions could significantly increase the erosion potential.
- g. Development on or above steep slopes could impact slope stability by changing surface or groundwater flow on the slopes. In addition, the risk of landslides could be impacted by construction near or on steep slopes because of grading disturbance or additional load application from structures such as buildings, road fill embankments, topographic alterations or retaining walls.
- h. Because of the steep slopes and existing groundwater conditions, modifications of groundwater or surface water flow may impact the potential size and frequency of mass wasting [landslide] events. The fine-grained soils found on site are susceptible to soil erosion resulting from the movement of heavy equipment or site grading.

Clearly, based on PSE's geologic study, any development and construction on this site will cause significant environmental impacts to the Earth element. Although an updated study will be included in the Preliminary Plat application, the conditions of the site remain. These Earth element impacts alone would require a Determination of Significance (DS) and an EIS.

- 2) **AIR:** Regarding the Air element, the following LIDAR image with subdivision overlay illustrates the extensive excavation, clearing, and grading that will be required to simply construct the two public roads and multiple non-compliant

private roads and to install utilities. The excavation, clearing and grading to construct 44 homes will also be extensive.

The multi-year construction period will certainly result in significant emissions to the Air element and would require a Determination of Significance and an EIS.



- 3) **WATER**: Regarding the Water element, the proposal will impose significant environmental impacts of Surface Water, Ground Water, and Water Runoff. As noted above, the PSE geologic study found that, “Future development of the site could impact the current hydrologic condition... Development on or above steep slopes could impact slope stability by changing surface or groundwater flow on the slopes.”

While the City will require storm water treatment, the City can well attest to the detrimental effects of uncontrolled runoff from human activity, which is known to be a major problem with the Lake Whatcom water supply. Uncontrolled - and uncontrollable - runoff will adversely impact the fragile Chuckanut Bay estuary.

Such significant impacts to the Water element require a Determination of Significance and an EIS.

- 4) **PLANTS**: Regarding the Plants element, this proposal is certain to remove and alter a significant percentage of the 50+ year-old deciduous and evergreen trees and dense vegetation that presently exist. The significant impact to the Plants element contributes to the Determination of Significance and need for an EIS.
- 5) **ANIMALS**: Regarding the Animals element, according to the January 2010 Critical Areas Report, this property has been serving as an extensive wildlife sanctuary for black-tailed deer, eagles, pileated woodpeckers, Douglas squirrels, sharp-skinned hawks, Cooper's hawks, songbirds, woodpeckers, amphibians, and small mammals.

Washington Department of Fish & Wildlife (WDFW) maps the property as Urban Natural Open Space and within 800 feet landward of the shoreline is mapped as Bald Eagle Buffer Management Zone. The Chuckanut Bay tidelands adjacent to this property is mapped with the following Priority Habitats: Eelgrass, Turf Algae, Potential Surf Smelt/Sand Lance Spawning Areas, and Hardshell Intertidal Clam.

The proposals' extensive excavation, clearing and grading and removal of trees and vegetation will cause substantial impacts to the Animal element justifying a Determination of Significance and need for an EIS.

- 6) **NOISE**: Regarding the Noise element, the proposal's impact will be significant. Many residents on S. Clarkwood Road and nearby have complained extensively about the blasting required to build the foundation for just one recently completed home. Compound that by 44 foundations. A Determination of Significance and an EIS are both warranted.
- 7) **TRANSPORTATION**: Regarding the Transportation element, the proposed 44-lot subdivision will exacerbate an already precarious condition for pedestrians, cyclists, pets and wildlife.

On February 15, 2017, 99 Edgemoor residents signed and mailed a letter to Mayor Kelli Linville regarding *Public Safety Concerns for Pedestrians on Edgemoor Roads* asking the City to "escalate the need to address the dangerous conditions that exist before someone is seriously injured - or worse."  
([http://bit.ly/Edgemoor\\_Ped\\_Safety\\_Letter\\_2-15-17](http://bit.ly/Edgemoor_Ped_Safety_Letter_2-15-17))

On April 13, 2017 several dozen Edgemoor residents met with Public Works Director Ted Carlson to develop possible solutions. We shared with Ted a 14-page *Edgemoor Pedestrian Safety survey* with 35 responses, many of which focused on the issues facing pedestrians on Viewcrest Road.  
([http://bit.ly/Edgemoor\\_Ped\\_Safety\\_Q\\_4-5-17](http://bit.ly/Edgemoor_Ped_Safety_Q_4-5-17))



Unfortunately, nothing was done to address the safety of pedestrians, cyclists, pets and wildlife on Edgemoor's precariously dangerous roads with limited visibility and no sidewalks.

The significant impacts imposed by the proposed 44-lot subdivision could very well be the last straw, finally causing serious injury - or worse. Absolutely, this impact will be significant. A Determination of Significance and an EIS is clearly warranted.

The Edgemoor Neighborhood Association Board appreciates the opportunity to provide public comment on the Jones Edgemoor Subdivision proposal. Please include this letter in the public record.

Thank you for considering our request to require an environmental impact statement based on the significant impacts this project will impose on multiple elements of the environment.

Sincerely,  
The Edgemoor Neighborhood Association Board  
Curt Thor, Vice President  
Sandie Koplowitz, Secretary  
Bob McCarthy, Treasurer  
Paul Bonde  
Larry Horowitz  
Terry Montonye  
Barbara Ryan  
Paul Scott  
Bill Wright

Attachments:

- February 15, 2017 letter hand delivered to Mayor Linville re: *Public Safety Concerns for Pedestrians on Edgemoor Roads*  
[http://bit.ly/Edgemoor\\_Ped\\_Safety\\_Letter\\_2-15-17](http://bit.ly/Edgemoor_Ped_Safety_Letter_2-15-17)
- April 5, 2017 Edgemoor Pedestrian Safety Questionnaire Responses hand delivered to Public Works Director Ted Carlson  
[http://bit.ly/Edgemoor\\_Ped\\_Safety\\_Q\\_4-5-17](http://bit.ly/Edgemoor_Ped_Safety_Q_4-5-17)

February 15, 2017

Mayor Kelli Linville  
City of Bellingham  
210 Lottie Street  
Bellingham, WA 98225

Re: Public Safety Concerns for Pedestrians on Edgemoor Neighborhood Roads

Dear Mayor Linville,

From time to time, residents of the Edgemoor Neighborhood post comments on the Nextdoor site regarding their concerns about pedestrian safety within the neighborhood. Recently, after nearly being hit by vehicles several times within a week, one neighbor reminded us all about the dangers of walking on roads with limited visibility and no sidewalks.

The July 2012 *Bellingham Pedestrian Master Plan* lists a variety of proposed improvements. Figure 3-8 on page 3-12 maps the proposed improvement for south Bellingham, including Sidewalk Infill on Fieldston, Willow and Linden Roads and Sidewalk Widening on Hawthorne Road.

In the *Community Survey Appendix* of the *Pedestrian Master Plan*, 81 residents from Edgemoor expressed concerns about pedestrian safety, more than any other neighborhood.

Almost five years have passed since the *Pedestrian Master Plan* was completed. The undersigned members of the community ask you to re-consider our safety concerns, for ourselves and especially for our children who walk every weekday to Fairhaven Middle School. We respectfully request that you escalate the need to address the dangerous conditions that exist before someone is seriously injured - or worse.

Thank you for considering our request.

Sincerely,

<i>Pam Bartling</i>	<i>Corinne Gimbel-Levine</i>	<i>Dawn Quyle Landau</i>	<i>Mark A. O'Deady</i>	<i>Jake Soder</i>
<i>Ann Boochever</i>	<i>Robin Godbolt</i>	<i>Frances LeCocq</i>	<i>Janice O'Rourke</i>	<i>Else Sokol</i>
<i>Cassandra Carr</i>	<i>Judie Greene</i>	<i>Irwin LeCocq</i>	<i>Christine Pacheco</i>	<i>Ann Swarens</i>
<i>Magnus Collander</i>	<i>Felix Greening</i>	<i>Ola Lessard</i>	<i>Elizabeth Paley</i>	<i>Lidia Tillman-McAdoo</i>
<i>Becky Connor</i>	<i>Jude Greening</i>	<i>Rob Lessard</i>	<i>Sally Parsons</i>	<i>Ann Marie Verneuil</i>
<i>Mandy Cox</i>	<i>Julian Greening</i>	<i>Fran Maas</i>	<i>Cecile Pickford</i>	<i>Elizabeth Wadsworth</i>
<i>Donna Davis</i>	<i>Michelle Greening</i>	<i>Maryalice Macdonald</i>	<i>Nicole Piscopo</i>	<i>Charlotte Waller</i>
<i>Victor DeMarino</i>	<i>Lisja Harper</i>	<i>Vincent Matteucci, MD</i>	<i>Ronald Quinn</i>	<i>Scott Ward</i>
<i>Ellane Dean</i>	<i>Paul Harper</i>	<i>Bruce McLeod</i>	<i>Fred Rhoades</i>	<i>Peggy Watt</i>
<i>Susan DeBari</i>	<i>Luella Heese</i>	<i>Holly McLeod</i>	<i>Gloria Rhoades</i>	<i>Andrew Widman</i>
<i>Angela Desler</i>	<i>Amanda Henkel</i>	<i>Rachel Medler</i>	<i>Eva Schile</i>	<i>Claire Widman</i>
<i>Jim Douglas</i>	<i>Bill Henkel</i>	<i>Donna Merlina</i>	<i>Jen Schile</i>	<i>Laura Widman</i>
<i>Veronica Douglas</i>	<i>David Hooper</i>	<i>Meg Metzger</i>	<i>Valerie Schile</i>	<i>Steve Widman</i>
<i>Barbara Ellis-Quinn</i>	<i>Larry Horowitz</i>	<i>Sarah Milligan</i>	<i>Vincent Schile</i>	<i>Janet Wisner</i>
<i>Kim Erickson</i>	<i>Patti Inhof</i>	<i>Phillip Morgan</i>	<i>Bunny Schneider</i>	<i>Steven Wisner</i>
<i>Kristen Fagan</i>	<i>Chris Jacobs</i>	<i>Sara Mostad</i>	<i>David Schneider</i>	<i>Greg Wolgamot</i>
<i>Greg R. Ford</i>	<i>Galie Jean-Louis</i>	<i>Steve Nakano</i>	<i>Anthony Schols</i>	<i>Bill Wright</i>
<i>Deborah Ann Frederick</i>	<i>Brad Johnson</i>	<i>Jim Nickol</i>	<i>Susanne Sherburne</i>	<i>Cinda Zemel</i>
<i>Gale Frederick</i>	<i>Lylene Johnson</i>	<i>Tara Nickol</i>	<i>Davey Silverman</i>	<i>Adam Ziegler</i>
<i>James N. Frederick</i>	<i>Barry Landau</i>	<i>Joe Nolting</i>	<i>Deja Engel Soder</i>	

**Edgemoor Pedestrian Safety Questionnaire Responses as of April 5, 2017**

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1	16th and <b>Viewcrest Road</b> to Fieldston and Viewcrest Road, Bellingham	Limited visibility, No place to move off-road, High speed vehicles, Overgrown or mature landscape	I live on Viewcrest Road. I have witnessed and experienced, both walking and in my car, cars speeding along this road that they either come so close to hitting you or causing an accident to happen. It is a very dangerous road. Also, there are enormous deer along this road, so you have to be so careful to not hit one. Cars speeding along here are a safety concern for people walking, cars driving and deer on the road. There are no sidewalks or even areas to get off the road easily.	Sidewalk, Gravel path for pedestrian to move off road, Speed bump		Talking to a person one to one is best.	Donna Davis
2	<b>Fieldston Rd</b> between Hawthorne and Viewcrest	No place to move off-road, High speed vehicles, Congested traffic area, Narrow and no sidewalks, cars can't avoid pedestrians in places with large rocks along roadway.	Narrow and no sidewalks, cars can't avoid pedestrians in places with large rocks along roadway, many speeding vehicles.	Sidewalk, Signage			Bill Wright
3	<b>Fieldston Road</b> where sidewalk ends to Viewcrest	Blind curve, No place to move off-road, High speed vehicles	Difficult to get off the road	Sidewalk			Marylee LeCocq
4	Anywhere on <b>Fieldston</b> . Especially between Willow and Linden.	Blind curve, Limited visibility, No place to move off-road, High speed vehicles	You cannot see pedestrians walking or running.	Sidewalk			Lisja Harper
5	<b>Bayside Rd.:</b> Sidewalk needed from Fairhaven Middle school crosswalk (at Hawthorn and Bayside intersection) to sidewalk that begins further west on Bayside, just after Acacia Pl.	Blind curve, Limited visibility, No place to move off-road, High speed vehicles, Congested traffic area, Dangerous intersection, Overgrown or mature landscape, Many children use this route walking to/from middle school.	This is a fairly short section between the middle school and the sidewalk on Bayside that does not have a sidewalk, but desperately needs one for the safety of students walking to/from school, especially because this is a blind corner and high traffic area, as well.	Sidewalk			Amanda Henkel

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6	<b>Bayside Road:</b> 4th to Hawthorne	Blind curve, High speed vehicles, Bayside Road narrows significantly at Acacia.	People speed around the blind curve heading east from 4th down the swale, and continue too fast as the road narrows and the sidewalk ends at Acacia.	Sidewalk, Speed bump	Need to slow Bayside traffic 4th to Acacia, then provide pedestrian safety Acacia to Hawthorne.	Thanks for asking.	Brien Thane
7	<b>Fieldston</b> , between Lairmont Manor and Viewcrest. Coincidentally, the section that does not have a sidewalk	No place to move off-road, High speed vehicles, Congested traffic area	I am out jogging or walking with my dog nearly every day. I avoid this section of Edgemoor after dark because it experiences the most car traffic and drivers exceeding 25 MPH. Parallel roads (Briar, Bayside) are not quite as heavily used. Sections of the road go from a good amount of shoulder space to nothing at all-some sections have a ditch very close to the street, others have landscaping or rocks.	Sidewalk, Gravel path for pedestrian to move off road, Speed gun, Speed bump	More shoulder space. I think drivers assume pedestrians have plenty of space; but there are some sections where pedestrians need to use the road. I have seen a LOT of drivers going way too fast for a residential area-I am guessing some sort of speed bump or monitor would help to reduce that.	I very much appreciate the new LED lights. Those brighter lights make a huge difference for pedestrian safety. Thank you very much, and Thank you for addressing these other concerns!!	Nicole Piscopo

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8	<p>Fieldston, Briar, Bayside, all do not have sidewalks in 90 percent of the streets, and encourage speeding, with no speed bumps in place, no MPH signs, blind curves, no place to move off road, and often cars parked on roads so even less area to move away from speeding cars.</p>	<p>Blind curve, Limited visibility, No place to move off-road, High speed vehicles, Congested traffic area, Dangerous intersection</p>	<p>I have had several near miss, cars speeding towards me at night, even with reflective gear on. This is because cars are not going the speed limit, and in addition there are no sidewalks to retreat to for safety.</p>	<p>Sidewalk, Gravel path for pedestrian to move off road, Speed bump, Signage, Pedestrian Flags (PedFlags) like those used in Kirkland, I believe we need a multi form approach with new signs, speed bumps, sidewalks on Fieldstone, Briar and Bayside, even if gravel; plus pedestrian flags.</p>	<p>See above Answers. 1. Sidewalks or Gravel Walks. 2. Speed Bumps on Fieldstone, Briar and Bayside. 3. Signage, every 200 feet or so. 4. Pedestrian Flags for the entire area.</p>	<p>Yes, we need to evaluate appropriate use of Clarks Point, the Residents Needs, and possibly reconsider signage and parking in this area to limit the amount of cars, trash they leave, and potential fire hazards of this population using Clark's point. Last week, I was driving the speed limit, 10 mph on the curve, and a red mustang with a young male driver, speed passed me on my left side to on coming traffic and walkers, and put all of us at risk. I suggest restricting park access area to residents and video security cameras. Again, I live up the street, but for residents of Madrona Point, this must be very concerning.</p>	<p>Galie Jean-Louis</p>
9	<p>Along Fieldston Rd. there is no sidewalk for students or pedestrians to walk. There is a ditch on each side of the road from the intersection of Willow north or cars parked at the top of the hill on the side. Since bus transportation is not available by the school district students only have the option of walking or parent transportation which just leads to more traffic on the road when it is at its highest use.</p>	<p>Limited visibility, No place to move off-road, High speed vehicles</p>	<p>Middle School Students as well as pedestrians walking along side of the road do not have a place to walk when going to school. This is a high traffic time on Fieldston due to commuters going to and from work.</p>	<p>Sidewalk</p>	<p>There is no sidewalk along Fieldston Rd but particularly from the cross street of Willow going north until the top of the hill near Lairmont Manor. A sidewalk begins at Lairmont's driveway.</p>		<p>Janet Wisner</p>

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10	Bayside Rd across from the middle school until the sidewalk begins to the west, and Fieldston Rd from the intersection of Hawthorn to Willow Rd	Blind curve, Limited visibility, Congested traffic area, Overgrown or mature landscape, Many people, especially children, walk on these stretches by the middle school and also to Bayside Swimming Club.	When school gets out, cars turning west onto Bayside Rd have to dodge cars parked/lining the sides of Bayside Rd, along with children crossing the street and walking to Bayside cars and homes. On Fieldston Rd, around the vicinity of the entrance to Larchmont Manor, there is a blind curve and steep hill. It is not safe to walk on either side. Children have almost been hit, especially at low light, walking to/from Bayside Swimming club.	Sidewalk	Sidewalks would solve the problem in both areas.		Else Sokol
11	<b>129 Hawthorn</b> by 20mph limited sight !	Blind curve, Limited visibility, High speed vehicles	Blind curve/ speeding	Speed bump	Do something to stop the speeding	No sidewalk, many near misses	Julian Greening
12	Walking along <b>Bayside, Briar and Fieldston</b> - the most dangerous is on Briar north of where it intersects with Middlefield Rd.	Blind curve, Limited visibility, High speed vehicles	Cars that are traveling north on Briar cannot easily see pedestrians and we have no place to escape when a car comes by.	Sidewalk			Diane Sue
13	<b>Fieldston and Willow</b>	Limited visibility, No place to move off-road, Children walking home from Fairhaven middle school without a sidewalk	Middle school aged children walking in groups and are often oblivious to traffic, walking well into the road. They are unable to get off the road due to the fact that the road meets the ditch without a pathway or sidewalk on the section of Fieldston near the intersection with Willow. I've witnessed several near misses while cars swerve into oncoming lanes to avoid kids. The hill on this section of road near the entrance to Lairmont Manor limits the visibility for cars cresting the hill, giving them minimal time to react to kids in the road.	Sidewalk, Gravel path for pedestrian to move off road	The sidewalk on the East side of Fieldston should be extended from Lairmont Manor to Willow.	This is also a main pedestrian route in the summertime for families to access Bayside Pool.	Angie Desler
14	From the top of <b>Fieldston</b> heading south! It is horrific seeing kids walk on that road. It is so dangerous in so many ways	Blind curve, Limited visibility, No place to move off-road, High speed vehicles, Overgrown or mature landscape	It is horrific seeing kids walking to and from school. They sometimes walk on the road instead of the grass. If someone in the city would walk from Fieldston south, and bring a loved one, and will see why it is imminent that a sidewalk be put in soon. I didn't allow my child to walk to school that way as it was so dangerous.	Sidewalk			Austin Papritz

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15	<b>Bayside</b> , approaching Hawthorne	Blind curve, Limited visibility, No place to move off-road, Congested traffic area, Dangerous intersection, Overgrown or mature landscape	Many students walk the part of Edgemoor as they come and go from Fairhaven middle school. After witnessing a student get hit by a car on the corner of Hawthorne and bayside, I contacted the city, who then put in the crosswalk. Bayside has no sidewalks in that area and terrible visibility as drivers come around the bend. It's very unsafe.	Sidewalk, Pedestrian crossing light, Signage, Speed limit changed to 15??			Stacey Kendrick
16	<b>Linden and Briar intersection</b> , etc. a lot the intersections have overgrown landscaping	Limited visibility, Overgrown or mature landscape	I have to pull out onto Briar to check if there are any cars coming from the south	Sidewalk, Gravel path for pedestrian to move off road	I think sidewalks are a positive solution -people need to get off the roads --we live in such a beautiful area sometimes walkers forget they are not on a trail -	-thank you	Janet Needler
17	Areas on <b>Bayside Place, Bayside Road, Cowgill</b> . Especially for school students . For speeding and other issues: Parts of Bayside Road, Briar, Fieldston etc. Of course, there are other areas.	Blind curve, Limited visibility, No place to move off-road, High speed vehicles, Overgrown or mature landscape	Some areas are similar to park-like lanes with beautiful views, but without street rules for the young and the not so young drivers.	Sidewalk, Gravel path for pedestrian to move off road, Speed bump, Signage, Pedestrian Flags (PedFlags) like those used in Kirkland	More street and/or property lights. Even solar powered yard lights seem better than none...	Bushes can be great for privacy, but can also hide invaders. They seem to work in Beverly Hills, but with lots of security systems. Not funny. Perhaps a "nice" police officer should drive by this area once in awhile at night time. It might help to just know about the possibility of an officer, or neighborhood watch in the area.	Lidia Tillman-McAdoo

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18	All streets	Vehicle driver and pedestrian inattention	Vehicular driver inattention and speed; Pedestrian inattention; wearing of dark clothing without reflectors or lights	education. Reporting by public of driver and pedestrian offenders to police		Cell phone usage has become the single most common distraction causing vehicular/pedestrian accidents. Most vehicular/pedestrian accidents occur on sidewalks or posted/marked crossings. Speed bumps slow or divert emergency vehicles Vehicular speed limits are not enforced. At night, pedestrian dark clothing without reflectors or lights are a major factor in causing vehicular/pedestrian accidents. Failure to dim lights by oncoming traffic is a major factor contributing to V/P accidents/	Bob Gibb
19	Bayside Rd between 4th and Hawthorn	Blind curve, Limited visibility, No place to move off-road, High speed vehicles		Sidewalk, Gravel path for pedestrian to move off road, Signage			Janet Masella
20	<b>Bayside Road</b> and Hawthorne intersection	Blind curve, Congested traffic area, Dangerous intersection		Sidewalk, Gravel path for pedestrian to move off road, Pedestrian crossing light			Sally Parsons



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21	Walk uphill towards Fairhaven Middle School Fieldston Road (uphill from corner of <b>Fieldston and Willow</b> )	No place to move off-road, High speed vehicles	Kids have to walk to school in the street with no sidewalk.	Sidewalk			Susan DeBari
22	Lack of safe walking shoulder or sidewalk along <b>Chuckanut Drive</b> between Willow and 16th/Viewcrest area of neighborhood	Limited visibility, No place to move off-road, High speed vehicles	Vehicles go VERY fast on Chuckanut, and often come over the hill (northbound) quickly. There is very little shoulder and a deep ditch no matter which side. For those of us that live on that end of the neighborhood, 16th Street/ Viewcrest are the only realistic access to our homes. It would appear from maps that, at one point, there was a connecting street (or it was planned), "Cross Street," between Broad and 16th, but that does not go through. Because of this, it is a VERY long way around to walk from our homes to the side walked part of Chuckanut. We live a mile from Fairhaven, but the only realistic route is highly dangerous. My husband I wear fully reflective jackets AND blinking safety lights and have still come very close to being hit. As in, literally had to jump into the ditch to avoid being hit. Even in the daytime, sun in the eyes can cause poor visibility.	Sidewalk, Gravel path for pedestrian to move off road	Please, please provide a sidewalk or significantly widen the shoulder. I don't even let my teenage kids ride their bikes to Fairhaven - it's just too deadly.	There is a sidewalk partly on the southbound side, but it suddenly ends in a bush. It's also covered in water/ice at the bush end. I expect the city could save a lot by just extending that section up to 16th. Anything short of 16th would not provide access to a large portion of residents.	Ola Lessard
23	<b>Fieldston Rd</b> between Hawthorne and Viewcrest	High speed vehicles, No sidewalks & narrow roadway	Pedestrians, including school children walking to and from Fairhaven Middle School , are exposed to vehicle traffic.	Sidewalk, Signage	Existing sidewalk ends at Hawthorne and starts a again at Viewcrest, it needs completion.		Bill Wright
24	<b>Fieldston</b> where there is not sidewalk south to Viewcrest.	Limited visibility, No place to move off-road, High speed vehicles	For the 3 reasons above and is major route for middle schoolers who have to walk as they are too close for bus service.	Sidewalk			Lisa Bottcher-Law

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25 A	<p>1)Fieldston south of Lairmont Manor and north of Viewcrest is narrow and has no crosswalk. There is little room to get off the road in places. Students are walking and riding bikes along here. Bikes wobble on hills.</p> <p>1A)Fieldston and Viewcrest intersection. This curved intersection is difficult to see around the bend to know if anybody is coming. For those headed south on Fieldston and turning left onto Viewcrest, this becomes very dangerous. It should be straightened out or at least all visual barriers (and piles of mulch or bark) must be removed permanently.</p> <p>2)Anywhere along Viewcrest, esp. where hills make it difficult to see pedestrians or for pedestrians to see oncoming cars. There are places where it's not possible to get off the road to avoid being hit.</p> <p>3)Corner of Middlefield and Briar (completely uncontrolled and poor vision).Exceptionally dangerous for drivers on Briar being T boned by oncoming, unaware drivers.</p>	Blind curve, Limited visibility, No place to move off-road, High speed vehicles, Dangerous intersection, Overgrown or mature landscape		Sidewalk, Gravel path for pedestrian to move off road, Speed bump, Signage			Elizabeth Paley

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25 B	<p>... continued 4)Corner of Bayside Rd. and Briar where people speed around this weird protrusion into the intersection...dangerous for car on car or for pedestrians</p> <p>5)Hawthorn from Edgemoor down toward Fairhaven M.S. when school has let out and kids walk 6 or 8 in a group. The recent re-design of the street makes it possible to hit a student's arm because the sidewalk is so close to the street, or if they push and shove, something much worse could happen. It was narrow enough before. Why was the road not expanded in recent "improvement" on the north side to allow good clearance?</p> <p>6) the intersection of Hawthorn and Fieldston seems to be banked incorrectly since the re-design. It was a problem before, but worse now. Cars heading north on Fieldston too fast, end up partially into oncoming traffic lane.</p>	<p>Blind curve, Limited visibility, No place to move off-road, High speed vehicles, Dangerous intersection, Overgrown or mature landscape</p>		<p>Sidewalk, Gravel path for pedestrian to move off road, Speed bump, Signage</p>			<p>Elizabeth Paley</p>

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25 C	<p>...continued 7)There are several established deer crossings where there should be signs warning drivers. The worst is on Fieldston just north of Viewcrest. Another is on Viewcrest just east of Clark.</p> <p>8) Corners are particular problems when drivers turn onto streets at a high speed. Example: Corner of Fieldston and the newer segment of Briar that was cut through ten years ago or so. A right turning car from Fieldston will mow down a pedestrian anywhere near the corner. I've nearly been hit by both cars and bicycles at high speed there.</p> <p>9)S. Clarkwood where the road curves to go up the hill. There is no viewing of pedestrians around that corner, and people drive fast to get up speed for the hill.</p> <p>10)nearly all streets with no sidewalks are less than ideal. I walk nearly daily year-round and occasionally at night. This neighborhood is not safe for pedestrians or wildlife, as we have seen many fatalities of young and mature animals.</p>	Blind curve, Limited visibility, No place to move off-road, High speed vehicles, Dangerous intersection, Overgrown or mature landscape		Sidewalk, Gravel path for pedestrian to move off road, Speed bump, Signage			Elizabeth Paley
26	The section of Bayside Rd between Hawthorne & Bayside Pl.	Blind curve, Limited visibility, No place to move off-road, Congested traffic area, Overgrown or mature landscape	For many youth walking to Fairhaven MS, this is a dangerous stretch of road. The rest of Bayside Rd is wide with sidewalks, but in this location it narrows & curves, with no sidewalks. It is very hard to see people walking on that stretch of road. If sidewalks/pathways are not put in, the speed should be posted at 10 mph.	Sidewalk, Gravel path for pedestrian to move off road, Signage			Tammi Laninga

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27	<b>Fieldston</b> - the entire length	Blind curve, Limited visibility, High speed vehicles	Speeding cars come over the hill just south of Willow and then again around the corner in the 600 block and its bad for both walkers and other cars.	Sidewalk, Gravel path for pedestrian to move off road, Speed gun, Signage	Perhaps one of the speed signs like on 30th	The intersection at Hawthorne and Fieldston is also a little crazy...	Kate Grinde
28	Intersection of north <b>Briar</b> as it hits the curve of north Bayside Rd	Limited visibility, No place to move off-road, Dangerous intersection, Overgrown or mature landscape, The nature of the curve and landscaping planted by the previous owner of the dead end road at the bottom of Briar. Even though the lavender is a low growing shrub there were laurels also planted there that have been trimmed by the new neighbors but nevertheless the curve itself in the elevation on either side lengths poor visibility for pedestrians and bike riders and cars off and cut this curve and straighten it out when they're driving so they end up on the wrong side of the road with oncoming vehicles.	Please see above	Remove all vegetation on both sides of Bayside Road higher than a foot	I don't know how to slow down traffic there so people stay on their side of the road and don't straighten the curve as they drive		Laura Widman
29	<b>Chuckanut Drive</b> from 21 Street to Willow	High speed vehicles, No sidewalk	This stretch of Chuckanut serves as the principle road connection between the neighborhoods of Chuckanut Village and Briza/southern Edgemoor and the rest of Bellingham. There are many Middles School and High School students that use these roads--and would use them more--to walk and ride to school. Drivers routinely speed in this area.	Sidewalk, Speed gun, Signage			Shannon Wright

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30	The intersection at <b>Fieldston and Willow</b> is dangerous because drivers on Fieldston drive too fast.	High speed vehicles, Dangerous intersection	There is a incline where cars pick up speed just before arriving at this intersection. Children walk up Willow and cross Fieldston to go to the pool in the summer. Every year deer are hit at this intersection, and I'm afraid a child will become a victim as well.	Speed bump, Signage			Davey Silverman
31	1-intersection of Fieldston and Willow, 2-intersection of Hawthorne and Fieldston, 3-512 Fieldston Rd area of Fieldston	Blind curve, Limited visibility, Dangerous intersection	<p>1-Fieldston &amp; Willow because of rise in road south of intersection &amp; increasing speed of drivers coming southbound on Fieldston down the hill &amp; hedges on NW and SE corners, both pedestrians and drivers are at significant risk of collision. Both my husband and myself have had nearly 4 accidents at this intersection with cars coming from Willow &amp; not able to see us coming on Fieldston</p> <p>2-Hawthorne &amp; Fieldston because of the 3 way intersection &amp; cars coming southwest up the hill on Hawthorne (from Fairhaven) &amp; cars at the stop sign on Hawthorne not coming to a complete stop. I've had 2 near misses with car accidents there.</p> <p>3-512 Fieldston Road - limited visibility of cars coming southbound on Fieldston &amp; the cars have been increasing their speed coming down the hill near Lairmont Manor. There is a curve and a rise in the road that both limit visibility. Pedestrians have had to dive into the bushes near my house to get out of the way of speeding cars.</p>	Sidewalk, Gravel path for pedestrian to move off road, Signage, Trimming of hedges / shrubbery; enforcement of stop signs or flashing stop signs with reminder of blind curves / limited visibility			Veronica Douglas

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32	Section of Bayside Rd between Hawthorne & Acacia Pl.	Blind curve, Limited visibility, No place to move off-road, Overgrown or mature landscape	Difficult to see pedestrians walking on the road because it curves. The road is narrow with very little option for either vehicles or pedestrians to move off-road.	Sidewalk, Gravel path for pedestrian to move off road, Signage	I think putting in a three way stop where Bayside Rd "T's" Hawthorne would be helpful. Installing stop signs would slow cars down on both roads. It would also increase the safety of pedestrians using the crosswalk on Hawthorne, which goes to Fairhaven MS just west of where Bayside Rd "T's" into it.		Pat Gillham
33	Intersection of Hawthorne and Broad has a beautiful tree in what seems to be a traffic circle, but nobody acknowledges it as a traffic circle.	Dangerous intersection	Cars often speed through the intersection. Some imagine it is a traffic circle and go around. Others fly directly left without going around it.	Signage	If there were a sign that said "Traffic Circle, proceed slowly around" that might solve the problem. Please don't imagine that the solution is to cut down the tree. It is a stunning tree, and somebody (city?) spent a		Barbara Ryan
34	The intersection of Willow and Fieldston	Limited visibility, High speed vehicles, Dangerous intersection	The west side of the intersection has a big blind spot due to the hedges there. A lot of people speed on Fieldston as well.	Signage			Dani Tamir

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#	1. Please describe dangerous location	2. Why is this location dangerous?	3. Please describe why this location is dangerous	4. How could situation be made safe?	5. Addl detail for improving the safety	6. Other info city should be aware of?	Name
35	Coming up or going down Fieldston next to Lairmont	Limited visibility, No place to move off-road, easy for cars to go too fast downhill		Sidewalk, Gravel path for pedestrian to move off road		middle school students often walk to/from home this way	Fred Rhoades



## Aven, Heather M.

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**From:** Larry Horowitz <dakini1@comcast.net>  
**Sent:** Tuesday, April 30, 2024 5:50 PM  
**To:** Bell, Kathy M.  
**Cc:** Wendy Larson; Janet Migaki; Lund, Kim J.; Lyon, Blake G.  
**Subject:** Public Comment letters to the City  
**Attachments:** 2024-03-25-notice-of-application.pdf

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

Kathy,

Although, as you state, "*the proposal and its supporting application materials have changed*," many comments submitted prior to the 3/25/24 Notice of Application were based on the applicant's 12/5/23 submittal and are as relevant after the NOA as they were before. Additionally, the key elements of the project site, including the unstable cliffs, erosion and landslide hazards, as well as the Mud Bay estuary, estuarine wetlands, mudflats, and salt marsh remain unchanged from the initial application. The significant adverse environmental impacts are essentially the same as they have been all along.

Contrary to your claim that "*the previously submitted early public comments are not relevant to the current proposal*," many of the concerns raised in the public comments received since 2020 are completely relevant to the revised proposal and supporting application materials and need to be considered as part of the city's review. Nothing in the Notice of Application or the correspondence you attached to your email indicates that previously submitted comments would be ignored by the city. Consequently, the parties of record who had submitted early public comment would have no idea that their comments would not be considered by the city as you review the current set of application materials.

As far as I am concerned, and as far as *Protect Mud Bay Cliffs* (PMBC) is concerned, please consider all of my public comments as well as all public comments submitted by PMBC that have been received by the city regarding the Jones Subdivision and Woods at Viewcrest to be re-submitted and relevant for the city's current review.

If you have any questions or require additional information, please let me know. Otherwise, it is my understanding that my request to include public comment submitted by PMBC and by me prior to the 3/25/24 NOA in the city's review will be honored.

Larry Horowitz  
Landline: 360.746.7154

On 4/30/2024 5:21 PM, Bell, Kathy M. wrote:

Larry,

Yes, the Woods at Viewcrest public comments received before and after the 3/25/24 Notice of Application are included in the administrative record. Due to the fact the proposal and its supporting application materials have changed, the previously

submitted public comments are not relevant to the current proposal. In response, the City sent the Notice of Application to all parties of record who had submitted early public comment inviting them to provide public comment for the current proposal and its supporting application materials.

Please refer to the attached correspondence concerning the timing for submitting public comment.

---

**Kathy Bell | Senior Planner**

Planning & Community Development Dept., City of Bellingham

360.778.8347 [kbell@cob.org](mailto:kbell@cob.org)



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[The Bellingham Plan | Engage Bellingham](#)

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

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**From:** Larry Horowitz <[dkini1@comcast.net](mailto:dkini1@comcast.net)>

**Sent:** Tuesday, April 30, 2024 12:47 PM

**To:** Bell, Kathy M. <[kbell@cob.org](mailto:kbell@cob.org)>

**Cc:** Wendy Larson <[info@mudbaycliffs.org](mailto:info@mudbaycliffs.org)>; Janet Migaki <[migakijanet@gmail.com](mailto:migakijanet@gmail.com)>; Lund, Kim J. <[kjlund@cob.org](mailto:kjlund@cob.org)>; Lyon, Blake G. <[bglyon@cob.org](mailto:bglyon@cob.org)>

**Subject:** Public Comment letters to the City

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

Kathy,

Since we never received a response from the city before the comment period expired, it is our understanding that all Woods at Viewcrest public comments received before and after the 3/25/24 Notice of Application are included in the administrative record.

Larry Horowitz

On 4/11/2024 3:21 PM, Bell, Kathy M. wrote:

Janet,

We have received this same question from all three of you and the City will be preparing a response.

---

Kathy Bell | Senior Planner

Planning & Community Development Dept., City of Bellingham

360.778.8347 [kbell@cob.org](mailto:kbell@cob.org)

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The Bellingham Plan | Engage Bellingham

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

-----Original Message-----

From: janet migaki <[migakijanet@gmail.com](mailto:migakijanet@gmail.com)>

Sent: Thursday, April 11, 2024 2:44 PM

To: Bell, Kathy M. <[kbell@cob.org](mailto:kbell@cob.org)>

Cc: Larry Horowitz <[dakinil@comcast.net](mailto:dakinil@comcast.net)>; janet migaki

<[migakijanet@gmail.com](mailto:migakijanet@gmail.com)>; Wendy Larson <[info@mudbaycliffs.org](mailto:info@mudbaycliffs.org)>

Subject: Public Comment letters to the City

[You don't often get email from [migakijanet@gmail.com](mailto:migakijanet@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.

Kathy,

Neighbors are confused about the 'Comment Letters' to be sent to the city in regards to the proposed development of the Jones property in south Edgemoor.

Could you please let me know, at your earliest convenience if previous comment letters sent BEFORE MARCH are considered as active "Public Comments" for the Hearing Examiner to be aware of and take note of, or, does the public have to submit new 'pubic comment' letters during this official comment period? What becomes of the old BEFORE march comment letters ?

This unfortunately is a time-sensitive question with the official 'comment period' coming to an end,

Thanks for any help you can pass along,

Janet Migaki

Bellingham Resident

949-375-4647

## Aven, Heather M.

---

**From:** Paul Brock <brock\_paul@hotmail.com>  
**Sent:** Wednesday, May 1, 2024 7:49 AM  
**To:** G.Proj.Wood at Viewcrest  
**Cc:** Bell, Kathy M.; Sundin, Steven C.  
**Subject:** The Woods at Viewcrest  
**Attachments:** Dec 1. 2022.pdf; Feb 25. 2021.pdf; Dec 3.2024.pdf; Jones threat Letter to apply for 82 lots.pdf

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

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

Please include the attached historical communication I have had about The Woods at Viewcrest project. These attachments are still relevant and show a long-standing pattern of concern that the community has had with this project that have not been addressed in the various RFI's that have been issued. I have also included a copy of a paper document the applicant mass mailed to the neighborhood titled "Jones threat Letter to apply for 82 lots.pdf ". This document contains a veiled threat of building 82 lots when they know there is no possible way this is an option, along with mischaracterizations of the project as a whole. This included document titled "Jones threat Letter to apply for 82 lots.pdf " goes beyond the application and further demonstrates the bad faith the applicant has with this project, and I would like it to be included with the public documents on this project to reflect the applicant's written stated position to the neighborhood.

Thank you,  
Paul Brock  
301 Crest Ln  
Bellingham, WA 98229

## Paul Brock

---

**From:** Paul Brock  
**Sent:** Thursday, December 1, 2022 2:11 PM  
**To:** Bell, Kathy M.; ssundin@cob.org; knabbefeld@cob.org; mayorsoffice@cob.org; Lilliquist, Michael W.  
**Subject:** The Woods at Viewcrest / This application should be considered complete

Attn: Kathy Bell, Steve Sudin, Kurt Nabbenfeld, Seth Fleetwood and Michael Lilliquist

This application should not be considered complete because it is missing the critical stormwater calculations and the calculations that they are attesting to using reflect an outdated standard and not the legal standard from 2019.

I am writing about the proposed project titled "The Woods at Viewcrest". I live on the corner of Crest Ln and Viewcrest and have quite a few concerns about the project as it's been defined so far. My main concern isn't that development will happen but in the way that it's being proposed. It seems obvious that the developer is trying to maximize the number of building sites with no concern for the long term impacts of the proposed density given the challenging topology. There is a reason this is the last large tract of land in Edgmoor. If this project had been proposed in the 1950's they would have just bulldozed and blasted the whole site to make it more friendly or more than likely just moved on to an easier site to build on. Now we find ourselves in 2022 and that type of development isn't legal any longer.

This brings us to the preliminary reports and some of the concerns I have. Most notably it looks like the developer has used boiler plate language around the stormwater report and although he left out his calculations it appears he used outdated standards that are no longer legal to produce the report. Given the lack of calculations it might be fair to assume the developer is approximating the stormwater requirements and made no calculations at all. The stormwater report is the clearest example of missing information that I believe needs to be addressed by the developer before the application is accepted as complete. I know it's long but below is this list of all the concerns I have about this project given the proposed density.

- The Preliminary Stormwater Report is completely missing "section 5.5". Section 6.6 says "The site improvements will meet Enhanced Treatment for this project with the use of modular wetland devices. The treatment method and sizing calculations are detailed in Section 5.5"
- The Preliminary Stormwater Report appears to be using standards from 2005 while I believe the legal standards that must be followed are the current 2019 standards. The calculations for either of these standards should be documented in the report.
- The drawings with lot lines and slope map, is for numerous lots, the area outside the orange/red where one could legally build is relatively small, like 50-60 ft wide, and somewhere in that flat spot is also a road. So although these are large lots, they have small legal building spaces.
- The wildlife report completely overlooks a large eagle nest that can be seen from anywhere in mud bay. If they missed such an obvious nest I don't know how we can take the rest of the report seriously.
- The plan calls for keeping a vast number of trees to hold the ground. I live on Viewcrest and I know it's hard to believe but 100 Mph winds are not uncommon at the head of this bay. There is no way any home owner is going to feel good about a 100 foot fir tree between their house and the bay. The south winds are brutal there. This property is currently protecting Clark, Viewcrest and Fieldston from the worst of those winds that those areas are going to have to endure with the inevitable loss of the tree canopy from this project.
- With so many lots crammed so close together there will be no room for the large trees on the site once the realities of the wind in that location are felt.
- The proposed subdivision is on property that is so steep that the proposed roads approach 14% grade
- The project is looking for many exemptions because of the challenges of this property

- There is no final plan on what to do with sewer because of the challenging topology but connecting into Sea Pines seems to be the preferred route. I know there is some issue with that sewer line but I'm not quite sure what it is. Their tack on this was it's not ideal but "it can be done".
- The environmental impact document they were working off is still 10 years old.
- The topology is so steep that to get to most of the lots they will need "private" roads or driveways to get around the road requirements. Once these private roads are in place there will be precious little room for actual houses without removing the sandstone rock for the building sites.
- The zoning says that lots in this neighborhood need to be 20K sf. They took this as an average in a subdivision (for now I believe this on its face). They are platting several lots from on the hill down the cliff face to the beach. These larger lots include a tract they graciously are including in a green zone between the beach and up the sandstone cliffs. Those few larger lots with massive steep cliffs are then being used to offset most of the other lots that are under 10K sf with private roads or cliffs splitting those lots in half again.
- We have been told that this project matches the characteristics of the neighborhood so many times it feels like if they said it enough times it will become true. It's not.
- There was no plan to deal with increased traffic on Viewcrest, 16<sup>th</sup> Street or the 12<sup>th</sup> street bridge. They did propose trimming some bushes on the corner of Viewcrest and Chuckanut to increase visibility while turning onto Chuckanut so it's not like they didn't think of traffic issues at all but trimming vegetation isn't a plan.
- The topology is challenging enough that fire trucks can't access most of the sites.
- The large boulders on the beach below the site didn't come up from the bay. It's obvious to a layman that the ground on the site is unstable in its current undisturbed state.

Thank you for your attention,  
Paul Brock  
301 Crest Ln  
Bellingham WA 98229

## Paul Brock

---

**From:** Paul Brock <brock\_paul@hotmail.com>  
**Sent:** Saturday, December 3, 2022 8:58 AM  
**To:** Nabbefeld, Kurt D.; Bell, Kathy M.; Sundin, Steven C.; MY - mayorsoffice@cob.org  
**Subject:** Re: The Woods at Viewcrest / This application should be considered complete

Kurt,

Clearly, I am not in tune with all the city processes and I can appreciate how language makes a difference. In this case it seems clear that the preliminary stormwater plan is not only incomplete which I now understand isn't part of the criteria for this part of the process but it's based on a standard from 2005 and lacks all evidence of any true calculations. In this case the feedback I have received from stormwater experts indicates it's illegal if implemented. Because of this I would suggest that while you received a document titled preliminary stormwater report, you in fact did not get a valid, or adequate, preliminary stormwater report. My expectation is that a preliminary stormwater report that is published with the current stormwater standards and provides the calculations based on those standards will be required before the submitted information is considered "adequate".

Thank you,  
Paul Brock  
301 Crest In  
Bellingham WA 98229

---

**From:** Nabbefeld, Kurt D. <knabbefeld@cob.org>  
**Sent:** Friday, December 2, 2022 4:08 PM  
**To:** Paul Brock <brock\_paul@hotmail.com>; Bell, Kathy M. <kbell@cob.org>; Sundin, Steven C. <ssundin@cob.org>; MY - mayorsoffice@cob.org <mayorsoffice@cob.org>  
**Subject:** RE: The Woods at Viewcrest / This application should be considered complete

Hello Paul –

Thank you for submitting your comments, they will be considered as we continue to review the recently submitted information. As a clarification, I want to make sure we are all understanding and using the same language as it relates to the project applications.

The city issued a [Determination of Completeness](#) for this project on April 5, 2022. We also issued a Request for Information (RFI) on April 28<sup>th</sup>. On November 23<sup>rd</sup>, the city received a response to the RFI from the applicant. We are now reviewing whether or not the resubmitted information is adequate to continue our review.

Determining whether or not an application is “complete” is substantially different than whether or not the city has all of the information needed to make a decision. Completeness revolves around our application submittal requirements, not the level of detail of a component of the submittal. For example, our application requirements state that a preliminary stormwater plan must be submitted. A plan has been submitted and therefore we can check that box on the submittal application checklist. Making a determination of completeness does not mean we have all of the details or specifics, it means that it has been submitted and we can move forward, even though additional clarification of the stormwater plan may still be needed.

The project is already complete from a process perspective, after reviewing the recently submitted information we will determine whether we can continue review or need to issue another RFI. You and the rest of our community will have additional opportunities to provide public comment on the proposal when we issue a Notice of Application and during the public hearing required for this project.

I hope this clarifies the process and unique language we use in the Planning arena. We will consider your email and appreciate your involvement in the public participation phase of this project!

Best Regards -

---

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

City of Bellingham  
Planning and Community Development  
Tel: (360) 778.8351  
Fax: (360) 778.8302  
Email: [knabbefeld@cob.org](mailto:knabbefeld@cob.org)

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

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**From:** Paul Brock <brock\_paul@hotmail.com>  
**Sent:** Thursday, December 1, 2022 2:11 PM  
**To:** Bell, Kathy M. <kbell@cob.org>; Sundin, Steven C. <ssundin@cob.org>; Nabbeffeld, Kurt D. <knabbefeld@cob.org>; MY - mayorsoffice@cob.org <mayorsoffice@cob.org>; Lilliquist, Michael W. <mlilliquist@cob.org>  
**Subject:** The Woods at Viewcrest / This application should be considered complete

Attn: Kathy Bell, Steve Sudin, Kurt Nabbenfeld, Seth Fleetwood and Michael Lilliquist

This application should not be considered complete because it is missing the critical stormwater calculations and the calculations that they are attesting to using reflect an outdated standard and not the legal standard from 2019.

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This brings us to the preliminary reports and some of the concerns I have. Most notably it looks like the developer has used boiler plate language around the stormwater report and although he left out his calculations it appears he used outdated standards that are no longer legal to produce the report. Given the lack of calculations it might be fair to assume the developer is approximating the stormwater requirements and made no calculations at all. The stormwater report is the clearest example of missing information that I believe needs to be addressed by the developer before the application is accepted as complete. I know it's long but below is this list of all the concerns I have about this project given the proposed density.



- The Preliminary Stormwater Report is completely missing “section 5.5”. Section 6.6 says “The site improvements will meet Enhanced Treatment for this project with the use of modular wetland devices. The treatment method and sizing calculations are detailed in Section 5.5”
- The Preliminary Stormwater Report appears to be using standards from 2005 while I believe the legal standards that must be followed are the current 2019 standards. The calculations for either of these standards should be documented in the report.
- The drawings with lot lines and slope map, is for numerous lots, the area outside the orange/red where one could legally build is relatively small, like 50-60 ft wide, and somewhere in that flat spot is also a road. So although these are large lots, they have small legal building spaces.
- The wildlife report completely overlooks a large eagle nest that can be seen from anywhere in mud bay. If they missed such an obvious nest I don’t know how we can take the rest of the report seriously.
- The plan calls for keeping a vast number of trees to hold the ground. I live on Viewcrest and I know it’s hard to believe but 100 Mph winds are not uncommon at the head of this bay. There is no way any home owner is going to feel good about a 100 foot fir tree between their house and the bay. The south winds are brutal there. This property is currently protecting Clark, Viewcrest and Fieldston from the worst of those winds that those areas are going to have to endure with the inevitable loss of the tree canopy from this project.
- With so many lots crammed so close together there will be no room for the large trees on the site once the realities of the wind in that location are felt.
- The proposed subdivision is on property that is so steep that the proposed roads approach 14% grade
- The project is looking for many exemptions because of the challenges of this property
- There is no final plan on what to do with sewer because of the challenging topology but connecting into Sea Pines seems to be the preferred route. I know there is some issue with that sewer line but I’m not quite sure what it is. Their tack on this was it’s not ideal but “it can be done”.
- The environmental impact document they were working off is still 10 years old.
- The topology is so steep that to get to most of the lots they will need “private” roads or driveways to get around the road requirements. Once these private roads are in place there will be precious little room for actual houses without removing the sandstone rock for the building sites.
- The zoning says that lots in this neighborhood need to be 20K sf. They took this as an average in a subdivision (for now I believe this on its face). They are platting several lots from on the hill down the cliff face to the beach. These larger lots include a tract they graciously are including in a green zone between the beach and up the sandstone cliffs. Those few larger lots with massive steep cliffs are then being used to offset most of the other lots that are under 10K sf with private roads or cliffs splitting those lots in half again.
- We have been told that this project matches the characteristics of the neighborhood so many times it feels like if they said it enough times it will become true. It’s not.
- There was no plan to deal with increased traffic on Viewcrest, 16<sup>th</sup> Street or the 12<sup>th</sup> street bridge. They did propose trimming some bushes on the corner of Viewcrest and Chuckanut to increase visibility while turning onto Chuckanut so it’s not like they didn’t think of traffic issues at all but trimming vegetation isn’t a plan.
- The topology is challenging enough that fire trucks can’t access most of the sites.
- The large boulders on the beach below the site didn’t come up from the bay. It’s obvious to a layman that the ground on the site is unstable in its current undisturbed state.

Thank you for your attention,  
 Paul Brock  
 301 Crest Ln  
 Bellingham WA 98229

## Paul Brock

---

**From:** Paul Brock  
**Sent:** Thursday, February 25, 2021 12:21 PM  
**To:** mlilliquist@cob.org  
**Cc:** ccmill@cob.org; Nicole Piscopo; mayoroffice@cob.org  
**Subject:** Jones Edgemoor Subdivision - Viewcrest Road  
**Attachments:** Pre-Application Letter.pdf

Council member Michael Lilliquist,

I am writing you today because of a new subdivision that is being proposed for Edgemoor. I want to start out by saying that I fully understand that the property in question is private and if I owned it with the intention of developing it then I would expect to be able to do that as long as I worked within the rules. I don't question the ability to or right to develop the property in any way.

Now that I have that out of the way there was a public meeting yesterday that I attended led by Ali Taysi who is both the applicant and the chair of the city planning commission. I am writing because this public meeting left a lot to be desired. I have quite a few concerns with the plan as outlined in the meeting and wanted to bring these to your attention if you are not away of them already.

- The proposed subdivision is on a property that is so steep that the proposed roads approach 14% grade
- The project is looking for many exemptions because of the challenges of this property
- The proposed cul-de-sacs are very close to each other to compensate for the challenging topology of the property
- There were lots of answers given with "it can be done". Specifically around stormwater and sewer questions
- It was obvious they were trying to avoid the questions about stormwater but we were told that the only option they have now is to discharge storm water in an above ground pipe and "fan" the discharge on the beach in mud bay.
- There is no final plan on what to do with sewer because of the challenging topology but connecting into Sea Pines was the preferred route. I know there is some issue with that sewer line but I'm not quite sure what it is. Their tack on this was it's not ideal but "it can be done".
- The environmental impact document they were working off was 10 years old.
- Ali told us with a straight face not to go to the council or any elected officials because there is nothing they can do about it. "They make policy and we follow it"
- The topology is so steep that to get to most of the lots they will need "private" roads or driveways to get around the road requirements.
- The zoning says that lots in this neighborhood need to be 20K sf. They took this as an average in a subdivision (for now I believe this on its face). They are platting several lots from on the hill down the cliff face to the beach. These larger lots include a tract they graciously are including in a green zone between the beach and up the sandstone cliffs. Those few larger lots with massive steep cliffs are then being used to offset most of the other lots that are under 10K sf with private roads or cliffs splitting those lots in half again.
- We were told that this project matches the characteristics of the neighborhood so many times it felt like they thought if they said it enough times it would become true. It's not.
- There was no plan to deal with increased traffic on Viewcrest or the 12<sup>th</sup> street bridge. They did propose trimming some bushes on the corner of Viewcrest and Chuckanut to increase visibility while turning onto Chuckanut so it's not like they didn't think of traffic issues at all but trimming vegetation isn't a plan.
- The topology is challenging enough that fire trucks can't access most of the sites so sprinklers will be required in any structures.

- This project obviously took the maximum density they can get by acreage and shoe horned in every possible building site.
- In the first 5 minutes of the presentation it was obviously not a honest, thoughtful use of this property. They simply are cramming as many lots as physically and cheaply possible no matter how many gymnastics they have to do to get there.

There are a ton of other issues that go with this project. If there is any way to raise the profile of this proposed project with the city I would appreciate it. If I should be talking to someone else about my concerns I would appreciate you letting me know who or what department that would be.

Thank you,  
Paul Brock / Nicole Piscopo  
301 Crest Ln  
Bellingham WA 98229  
360.715.1643

# The Woods at Viewcrest

**Dec. 8, 2022**

**Dear Edgemoor and Chuckanut neighbors,**

Bellingham is a special place, blessed with stunning waterfront vistas, lush vegetation and views of majestic mountains. Our family knows this as well as any since three generations have lived here for over 120 years.

In addition to growing up in Bellingham and living in Edgemoor, we've resided next to approximately 38 acres that our family owns on the north side of Chuckanut Bay. Our family has been exploring options for development of our property for over 30 years, with the intent to prepare the most thoughtful, ecologically balanced proposal for the property. Now, after the significant forest fire event in 2021 that was caused by trespass camping activity, and which put the existing forest and neighboring homes at risk, we decided to move into a more active phase of planning.

We've been working with City of Bellingham officials on The Woods at Viewcrest, a single-family residential project designed to improve the property with housing while protecting the environment and showing sensitivity to neighboring property owners and the neighborhood's character. We are working with local professional planners, designers, engineers, biologists and other local consultants on this plan.

Our entire team cares about the well-being of the property and the community. We recently submitted additional information to the City, which now is giving residents an opportunity to comment on our plans. This letter is intended to inform you and correct some misinformation about the project that has been circulating in the community.

## **Density**

Our property is nearly 38 acres. It has City Residential Single zoning, which allows a density of 1 lot per 20,000 square feet of land. (Please note this doesn't mean that 20,000-square-foot lots are required.) This means the zoning would allow 82 houses on the property.

However, we are proposing a plat that consists of only 38 lots (37 housing lots and one reserve lot) at The Woods at Viewcrest – just 46% of the total allowable density. We are clustering this development to reduce project impacts; all the lots will be consolidated in approximately one-third of the property toward its northwest boundary.

We are forfeiting over half of the potential value through the reduced density and design, with the intent to preserve and protect the most sensitive areas of the site and balance our community's human needs with habitat and wildlife needs.

### **Environmental setbacks/buffers**

The project design avoids all wetlands and wetland buffers. No infrastructure, building areas, other improvements or clearing/tree removal is proposed in the wetlands or their buffers. All wetlands and buffers are retained intact under this proposal. **All wetlands and buffers will be placed in a conservation easement for long-term protection.**

The project design avoids the entire 200-foot shoreline jurisdictional area (which includes the 200-foot shoreline buffer) from the Ordinary High Water Mark (OHWM) of Chuckanut Bay. The only improvements within this buffer area are related to the required storm water outfall. (See discussion of storm outfall below.) This entire area, totaling over 8 acres, will also be protected in a conservation easement and separate tract. It will be retained in native vegetation. No tree removal for development is proposed in this area, but we, in coordination with the City, will actively manage these areas to assure safety to our community and neighbors.

The building envelopes for the lots that abut this 200-foot shoreline buffer are set back even further. The setbacks for the building envelopes range from 424 feet to 561 feet from the OHWM of Chuckanut Bay, with an average setback of 475 feet. These additional setback areas outside the 200-foot shoreline buffer will also be retained in native vegetation and will preserve an additional 6-8 acres of land. **This is very different from existing developments to the east (Briza) and west (Clarkwood), where homes are built much closer to the OHWM (between 100 feet and 150 feet).**

### **Mud Bay Cliffs**

The above setbacks and buffers protect all of a majority of the steep slopes on the site, and the steep slopes or "cliffs" adjacent to Chuckanut Bay. This area will be placed in a conservation easement for long-term protection. **This is very different from existing developments to the east (Briza) and west (Clarkwood), where private lot lines extend to the beach for private access. Our proposal creates a beach nature-preserve.**

On the upper portion, new, minimal impact design features are incorporated. By following existing grade lines as much as reasonable, roads and utilities will have reduced impacts. We have proposed variances to allow shared driveways that greatly reduce road widths from the standard requirement in order to retain more natural vegetation.

The storm water for this project will be treated to an enhanced standard. **This will result in storm water leaving the site at a higher level of treatment than any other outfall to Chuckanut Bay (including the Clarkwood and Briza developments and all of the Chuckanut Village area, where there are septic systems in use).**

All runoff from pollution-generating surfaces (roads, driveways, etc.) will be captured, contained, and routed through treatment filters before leaving the site. Runoff will then be conveyed to dispersion structures before being discharged into Chuckanut Bay. The outfall pipes running down the slope will be above grade (not buried) and will be placed to avoid large trees, so no excavation or significant tree removal is anticipated to be necessary for their construction.

The dispersion facility at the bottom of the pipe will be placed above the sandstone rocks at the beach level so it will be hidden from view from the water and surrounding properties. This water will disperse through the facility, then disperse further over the sandstone rocks, reducing the risk of any scouring at the beach. **Storm water leaving the project will be clean and will not result in beach scour.**

### **Public trail**

A public trail easement will be provided from Viewcrest Road through to Sea Pines Road, allowing Edgemoor residents to reach the existing public beach access stairs located within the Briza community. Public beach access from this property is unsafe due to steep terrain and would be environmentally damaging. However, this will eliminate the need for a new beach access on site, which would result in clearing and unnecessary environmental impact. Another access point would be unsafe due to the steep terrain along the beach. **The new public trail easement will provide a key beach access link for the Edgemoor neighborhood.**

### **Summary**

Studies addressing all of the above issues have been completed by qualified professionals and will be reviewed by the City of Bellingham's Planning, Public Works and Parks staff. We have prepared a storm water report, a habitat assessment, a geotechnical report, a critical areas report, a cultural resource assessment and a traffic impact analysis.

The project will be reviewed by the City with a hearing in 2023. After the City's Hearing Examiner grants approval, construction permitting requirements may also be processed in 2023. Development will be constructed in phases, with the initial phase occurring primarily along Viewcrest Road.

If infrastructure design and permitting is completed in 2023, infrastructure construction could occur in 2024. Once this is complete, then The Woods at Viewcrest will be able to receive final approval, creating individual lots for home construction. These lots could then be sold or developed on a lot-by-lot basis.

We appreciate the time you are taking to become informed about The Woods at Viewcrest. By reading this letter, it suggests that you are willing to learn from those who know the most about the property and their project - our family. We have a lifelong interest in preserving the ecological value of the property and Chuckanut Bay while also providing more homes for people to live within the City limits of Bellingham.

We ask you to support this very reasonable, thoughtfully conceived and balanced project, which incorporates extraordinary environmental protection measures while still providing infill development of residential homes in an area served by existing City infrastructure.

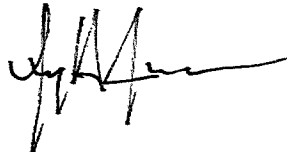
If you would like to learn more about our project or if you have any questions, please call or email Ali Taysi, principal of AVT Consulting of Bellingham, at [ali@avtplanning.com](mailto:ali@avtplanning.com), (360) 527-9445.

Sincerely,

Rogan Jones



Susan Jones



Elizabeth Jones



**Aven, Heather M.**

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**From:** Christopher Grannis <chrgra@gmail.com>  
**Sent:** Thursday, May 2, 2024 11:08 AM  
**To:** Bell, Kathy M.; MY - mayorsoffice@cob.org; Lyon, Blake G.; Lilliquist, Michael W.  
**Cc:** Monika Cassidy; Steve Wilson; Jessica Orr; Christopher Grannis  
**Subject:** Re: Letter from South Neighborhood Association re: Proposed development above Mud Bay Cliffs

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

I have recently learned the Planning Department is claiming that comments submitted previous to the 3/25/24 Notice of Application for the Woods at Viewcrest are not relevant to the current proposal. Our Neighborhood was not informed of this. We believe these comments to be relevant and insist they be included for the current review.

This is the letter sent by the South Neighborhood Association 11/8/23. Please consider these public comments from our Neighborhood as well as all other public comments that have been received by the city regarding the Jones Subdivision and Woods at Viewcrest to be relevant for the city's current review.

Christopher Grannis  
360 647 4758

On Wednesday, November 8, 2023 at 11:20:26 AM PST, Christopher Grannis <chrgra@gmail.com> wrote:

To:  
Kathy Bell, Senior Planner [Kbell@cob.org](mailto:Kbell@cob.org)  
Planning & Community Development Department  
City of Bellingham

Mayor Seth Fleetwood [mayorsoffice@cob.org](mailto:mayorsoffice@cob.org)  
Blake Lyon, Planning Director [bglyon@cob.org](mailto:bglyon@cob.org)  
Michael Lilliquist [mlilliquist@cob.org](mailto:mlilliquist@cob.org)

Re: 38 lot development on Mud Bay

SNA believes the proposed 38 lot development, on the north shoreline of the Chuckanut Creek Estuary, aka, "Mud Bay" the City identified wetland estuary, will have a significant adverse environmental impact.

The South Neighborhood Association requests the Planning Department declare that Mud Bay consists of estuarine intertidal wetlands and is not a flow control exempt Salt Water body, and require



that missing or incomplete information, identified by the organization "Protect Mud Bay Cliffs" be provided by the developer before the City begins to prepare a SEPA threshold determination. [PMBC 8-17-23 letter to Kathy Bell re 8-7-23 Woods at Viewcrest RFI.pdf](#)

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

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

Monica Cassidy  
Christopher Grannis  
Steve Wilson  
Jessica Orr

**Aven, Heather M.**

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**From:** Joe Nolting <jtnolting@gmail.com>  
**Sent:** Sunday, May 5, 2024 6:50 PM  
**To:** G.Proj.Wood at Viewcrest  
**Subject:** The Woods at Viewcrest

Planning and Community Development Department:

My residence is at 719 Fieldston Road—close to the proposed development of The Woods at Viewcrest. From my reading and research on this project, I feel that it is a very bad idea for the City of Bellingham to approve the critical areas permit and other shoreline permits. The site contains numerous critical areas along with significant geological hazards and it appears that no amount of mitigation can offset the potential damage to this fragile and important habitat.

In addition, Viewcrest Road currently poses serious safety challenges to drivers and pedestrians. The road is narrow, has no shoulder, and contains multiple blind spots. The Woods at Viewcrest development will significantly increase the traffic flow on Viewcrest and make an already dangerous situation much worse.

I trust that your department will, after careful study of this proposed project, realize that it is a bad idea and not approve the permits.

Sincerely,

Joseph Nolting  
719 Fieldston Rd

# Larry Horowitz

Bellingham, WA

May 19, 2024

Blake Lyon, Planning & Community Development Department Director  
Kurt Nabbefeld, Development Services Manager & SEPA Responsible Official  
Kathy Bell, Senior Planner  
Steve Sundin, Senior Environmental Planner  
City of Bellingham  
210 Lottie Street  
Bellingham, WA 98225  
Via Email

Copy Via Email:

Mayor Kim Lund

Renee LaCroix, Assistant Director, Public Works Natural Resources  
Bellingham City Council

Re: ***The Woods at Viewcrest***

- Lack of Integrity and Internal Consistency

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

*The Woods at Viewcrest* application materials contain significant internal inconsistencies, and they lack the integrity necessary to be relied upon to issue a SEPA threshold determination (or mitigated determination) of nonsignificance (DNS or MDNS), submit a recommendation to the Hearing Examiner, or make any permit decisions. Specifically:

- As explained in Exhibit A of the *Protect Mud Bay Cliffs* public comment submittal (<https://bit.ly/PMBC-EXH-A>, page 14, item C.18 *Outdated Plans and Maps*), the *Project Area & Lot Layout* and the *Percent Slope Map & Lot Layout* presented in the applicant's 10/6/22 [Geotechnical Investigation & Geohazard Report](#) (applicant Exhibit E, Figures 2 and 3B) are outdated and do not reflect changes made to the project plans. Consequently, references to specific lots within the applicant's geotech report (e.g., §4.4.2, §5.1.3, §5.12.1) are internally inconsistent with the actual project plans and lot configurations presented in the applicant's Exhibit A. The use of outdated information, combined with internal inconsistencies, cause the 10/6/22 geotech report to be unreliable.
- As described in Exhibit L of the *Protect Mud Bay Cliffs* public comment submittal (<https://bit.ly/PMBC-EXH-L>, page 5, Discretionary Liberty #5), "On several occasions, city planners have requested the applicant submit clarifications and a site map that clearly delineates where building envelope locations that are not encumbering hazard areas and their buffers. To date, the Administrative Record

has no demonstration that 38 building envelopes can exist on the plat design without encumbering geohazards or their buffers.”

- In a desperate attempt to prove that the building envelopes are not encumbered by geologically hazardous areas, the applicant has, without any explanation, deleted a large section of GEOLOGICALLY SIGNIFICANT CRITICAL AREAS impacting lots 20, 23-27, and 29-30. These GEOLOGICALLY SIGNIFICANT CRITICAL AREAS are depicted by green polygons on the 6/9/23 Building Envelope & Existing CAO Areas site plan but not on the updated 12/1/23 version of this site plan. In other words, these green polygons were purposely deleted from the 6/9/23 version when the 12/1/23 version was prepared. These site plans are presented as Sheet 5 in their respective set of project plans (applicant Exhibit A). The impacted area is shown in the red boxes in Appendix 1 below. This deletion represents either an intentional misrepresentation of existing critical areas or an egregious error that raises serious questions about the reliability of the applicant’s project plans.
- The green GEOLOGICALLY SIGNIFICANT CRITICAL AREA polygons on the 12/1/23 Building Envelope & Existing CAO Areas site plan (applicant Exhibit A, Project Plans, Sheet 5) fail to include many of the site’s erosion and landslide hazard areas that are illustrated in yellow and orange on the applicant’s 10/6/22 *Percent Slope Map* (Figure 3B of the Geotech Report at Exhibit E). This significant omission impacts lots 4-5, 11-13, 16-17, 22-31, 33-34 and 36. The impacted area is shown in the red boxes in Appendix 2 below. The failure to disclose these erosion and landslide hazards areas also represents either an intentional misrepresentation of existing critical areas or an egregious error that raises serious questions about the reliability of the applicant’s project plans.

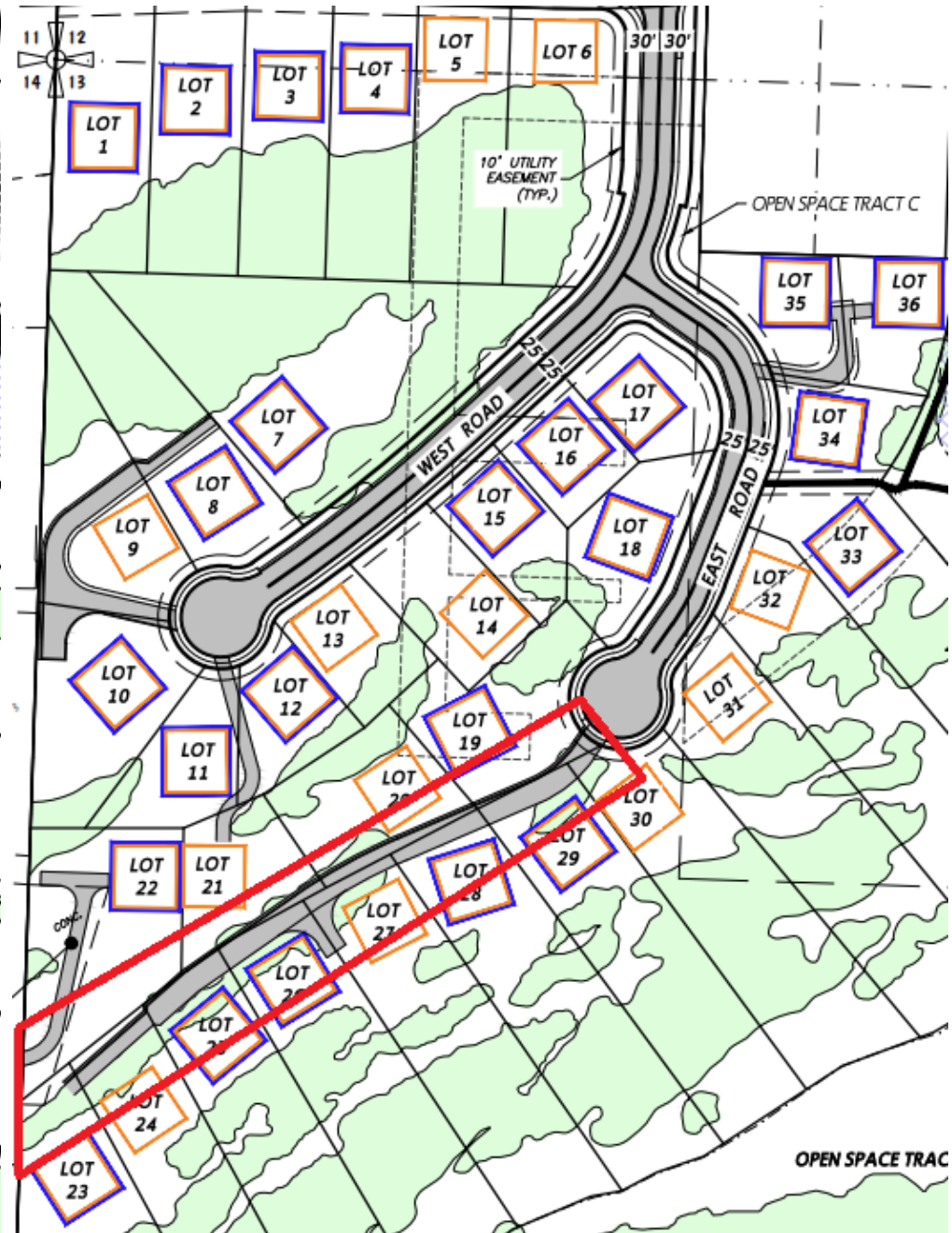
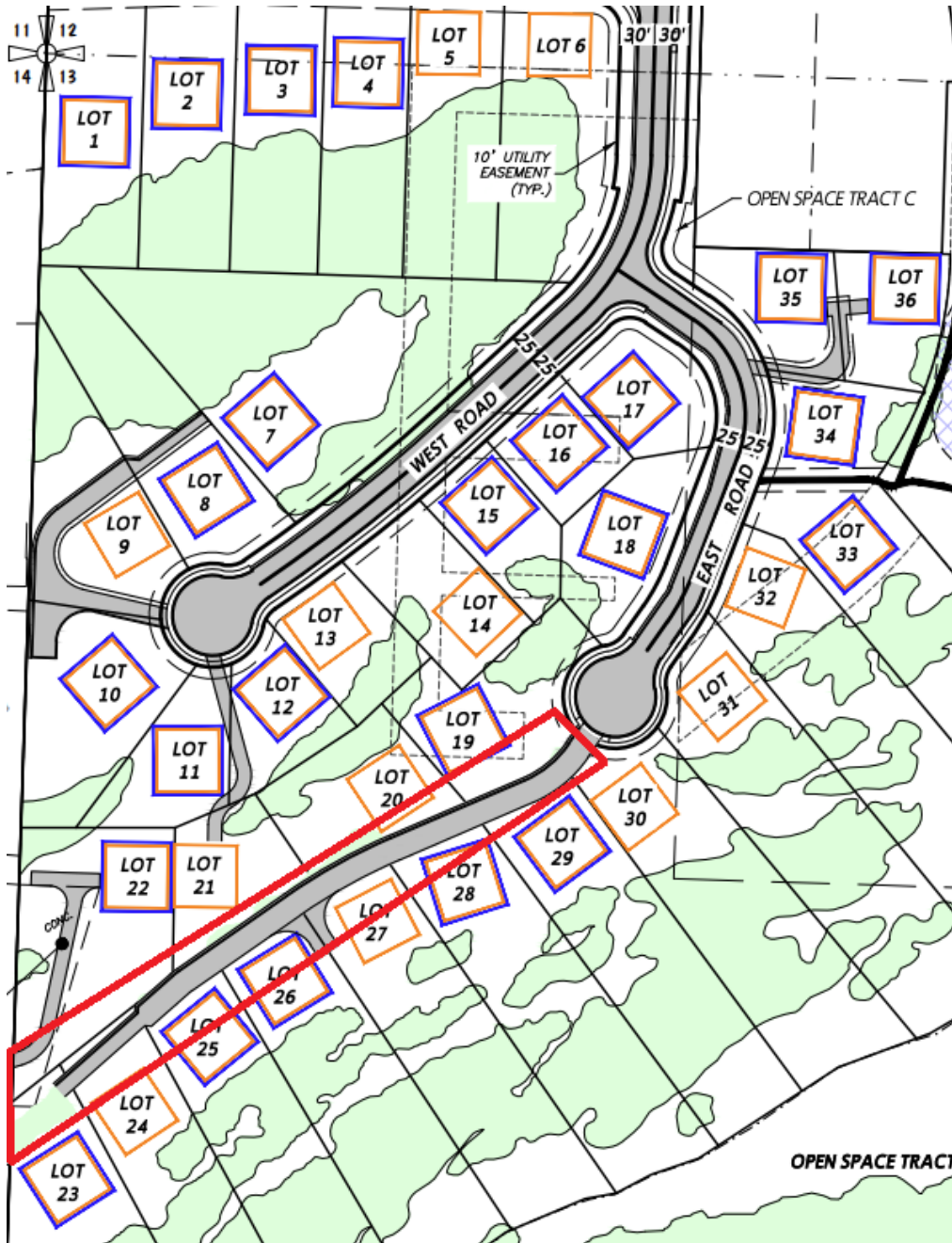
The use of outdated materials and the documented internal inconsistencies and misrepresentations represent a lack of integrity of both the applicant’s geotech report and project plans and cause these application materials to be unreliable. The applicant’s failure to use current, internally consistent application materials and to fully - and honestly - present critical area information makes it impossible for the city to trust these materials to provide sufficient information necessary to conduct a robust environmental review. The city must require an environmental impact statement be prepared in order to obtain comprehensive, independent and objective information about the potential adverse environmental impacts the proposed *Woods at Viewcrest* subdivision is likely to impose.

I appreciate the opportunity to provide public comment on *The Woods at Viewcrest* subdivision proposal. Please include this letter in the administrative record.

Sincerely,  
Larry Horowitz

# Appendix 1: The Woods at Viewcrest: Building Envelope & Existing CAO Areas (Site Plan Sheet 5)

## Failure to Disclose Erosion & Landslide Hazard Areas

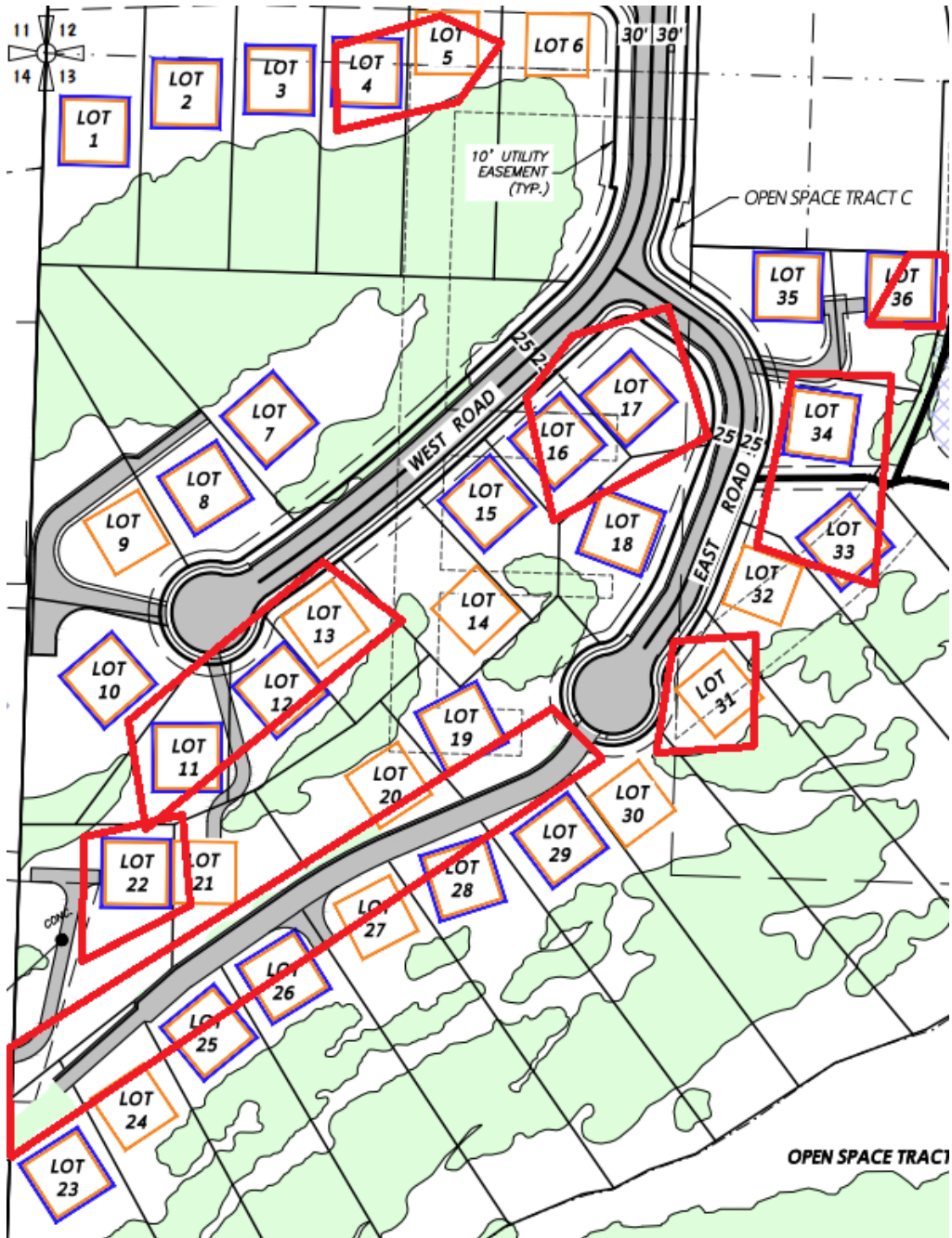


Source: 12/1/23 Exhibit A: Site Plan Sheet 5 - Building Envelope & Existing CAO Areas

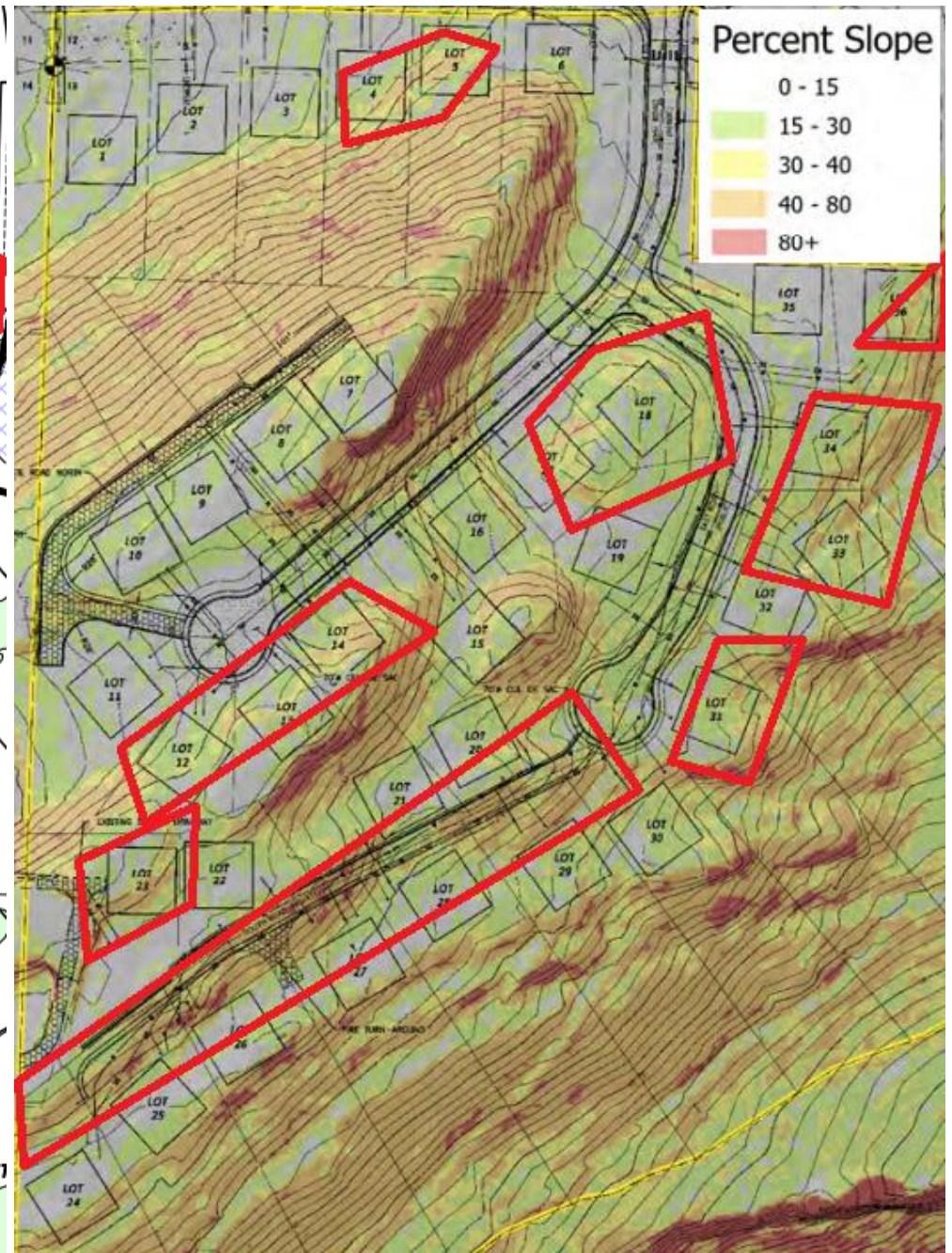
Source: 6/9/23 Exhibit A: Site Plan Sheet 5 - Building Envelope & Existing CAO Areas

# Appendix 2: The Woods at Viewcrest: Building Envelope & Existing CAO Areas (Site Plan Sheet 5)

## Failure to Disclose Erosion & Landslide Hazard Areas



Source: 12/1/23 Exhibit A: Site Plan Sheet 5 - Building Envelope & Existing CAO Areas



Source: 10/6/22 Exhibit E: Geotech Report Percent Slope Map Figure 3B

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,

*Charles Redell*



*Bellingham, WA 98229*

1. 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.
2. 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.
3. 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.
4. 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.
5. 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.
6. 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 characteristics and 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.

Therefore, I'm asking the city to protect the public interest 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,  
Deborah Wessell

**Aven, Heather M.**

---

**From:** Larry Horowitz <dakini1@comcast.net>  
**Sent:** Friday, May 31, 2024 7:54 PM  
**To:** Michael Feerer; G.Proj.Wood at Viewcrest  
**Subject:** The Woods at Viewcrest -- Request for EIS

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

Michael,

Thanks to you and your colleagues at Whatcom Million Trees Project for taking time to submit a comment letter on The Woods at Viewcrest proposal. Protect Mud Bay Cliffs, our volunteers and supporters greatly appreciate WMTP's request that the city require a Determination of Significance and an EIS.

Warm regards,  
Larry

On 5/30/2024 2:38 PM, Michael Feerer wrote:

Please see our attached comment letter regarding this proposed project application.  
Thanks.

Sincerely,  
Michael Feerer, Executive Director (he/him)  
360-319-1370 voice/text

**Whatcom Million Trees Project**

<https://whatcommilliontrees.org>

For the latest, follow us on [Facebook](#) [Instagram](#) or [subscribe to our monthly newsletter](#)

*We are on the ancestral homelands of the Coast Salish Peoples, whose tribal treaty rights we support and for whose enduring care of the lands and waters we are deeply grateful.*