

THE WATERFRONT DISTRICT 2018 SUB-AREA PLAN PROJECT

FINAL EIS ADDENDUM



PORT OF BELLINGHAM

February 12, 2019



PORT OF BELLINGHAM

Washington State

February 12, 2019

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Shorelands and Environmental Assistance
Environmental Review Section
Washington Department of Ecology
P.O. Box 47703
Olympia, WA 98504-7703

RE: **EIS Addendum to Final Environmental Impact Statement for the proposed 2018 Waterfront District Sub-Area Plan Project, Bellingham, Washington**

Dear Sir/Madam

The Port of Bellingham (Port) together with the City of Bellingham (City) have been analyzing long-term redevelopment opportunities for the Waterfront District (also known as the "New Whatcom Special Development Area") since January 2005. The City's 2018 Waterfront District Sub-Area Plan is subject to review under the State Environmental Policy Act (SEPA).

Both the City and Port are agencies with jurisdiction for the proposed 2018 Waterfront District Sub-Area Plan Project. Under Interlocal Agreements, both parties have designated the Port as the SEPA lead agency for Proposed Actions associated with the Waterfront District.

On December 19, 2018, pursuant to the Port's adopted SEPA Procedures, a Determination of Significance (DS), Notice of Adoption of Environmental Documents, Notice of Issuance of EIS Addendum, and EIS Addendum were issued for public comment related to the Port and City's proposed changes to the City's Waterfront District Subarea Plan and the Port's revisions to its Comprehensive Scheme of Harbor Improvements.

Copies of the DS, Notice of Adoption of Environmental Documents, Notice of Issuance of EIS Addendum, and Draft EIS Addendum were distributed to agencies, organizations and individuals noted on the Distribution List, and copies of the Draft EIS Addendum were available at the Bellingham Central Library and at the Port and City offices. A thirty (30) day comment period on the Draft EIS Addendum was provided, from December 19, 2018 to January 18, 2019. The public comment period concluded on January 18, 2019 and no comments were received.



Port Resolution 1380, "District Guidelines of Compliance with the Provisions and Requirements of the State Environmental Policy Act...", Part Six, Section 17.2.(3) states that *"After end of the public comment period, issue a Final Addendum, including a written response to comments received, or issue a withdrawal of the Addendum."*

Consistent with Port Resolution 1380, the Final EIS Addendum is attached. No further SEPA-related review is necessary.

This Final EIS Addendum has been distributed in the same manner as the Draft EIS Addendum. The Final EIS Addendum can be viewed and downloaded at the Port's web site under Waterfront District / Background / Environmental Impact Statement at:

<https://www.portof Bellingham.com/421/Environmental-Impact-Statement>

Persons interested in receiving an electronic copy of this Final EIS Addendum via email should contact Greg McHenry at 360-676-2500 or by email at gregm@portofbellingham.com

Thank you for your interest and participation in this environmental review.

Sincerely,

Andrew W. Maron

SEPA Responsible Official

**THE WATERFRONT DISTRICT 2018 SUB-AREA PLAN PROJECT
FINAL EIS ADDENDUM**

**PORT OF BELLINGHAM
BELLINGHAM, WASHINGTON**

**Prepared for the Review and Comments of Citizens,
Groups and Governmental Agencies**

In Compliance with
The State Environmental Policy Act of 1971 (RCW 43.21C)
and the Port of Bellingham SEPA Policies and Procedures

February 12, 2019

FACT SHEET

PROJECT TITLE

The Waterfront District 2018 Sub-Area Plan Project

2018 UPDATED PREFERRED ALTERNATIVE

The proposed *2018 Sub-Area Plan* analyzed in this EIS Addendum reflects updates to the 2013 Sub-Area Plan analyzed in the 2012 EIS Addendum and previous SEPA review documents for the Waterfront District Redevelopment Project. Based on continued coordination between the Port of Bellingham (Port) and the City of Bellingham (City), and agreements with a private development company to develop a portion of the Downtown Waterfront Area, the Port has prepared a proposed *2018 Sub-Area Plan* for analysis in this 2018 EIS Addendum.

In many respects, the redevelopment assumptions supporting the proposed *2018 Sub-Area Plan* are similar to or less than that described for the 2008 Draft EIS, 2008 Supplemental Draft EIS, 2010 Preferred Alternative in the 2010 EIS Addendum, 2010 FEIS, and 2012 EIS Addendum.

The redevelopment assumptions underlying the proposed *2018 Sub-Area Plan* that have been modified/updated from the 2012 EIS Addendum primarily include:

- Street Grid in the Downtown Waterfront Area
- Internal Boundary between Downtown Waterfront/Log Pond Area
- View Corridors
- Layout of Parks, Open Space and Trails
- Roadway Improvements and Phasing

The Proposed Actions evaluated in this EIS Addendum are similar to those contemplated in the 2008 Draft EIS (DEIS), 2008 Supplemental Draft EIS (SDEIS), 2010 EIS Addendum, 2010 Final EIS (FEIS), and 2012 EIS Addendum. Potential environmental impacts under the proposed *2018 Sub-Area Plan* are addressed in this EIS Addendum and compared to the applicable previous SEPA environmental review conducted for the Waterfront District. This EIS Addendum, together with the 2008 DEIS, the 2008 SDEIS, 2010 EIS Addendum, 2010 FEIS, 2012 EIS Addendum and previous environmental documentation (see page vi) comprehensively analyze the environmental impacts of the Proposed Actions.

PROPOSED ACTIONS

The Waterfront District includes approximately 237 acres of contiguous waterfront property and adjacent aquatic area in central Bellingham. The adjacent aquatic area associated with the Waterfront District is included within the area analyzed in the *Whatcom Waterway Cleanup Site Supplemental EIS 2007*.

The Port has been analyzing long-term redevelopment opportunities for The Waterfront District site. The Port and the City have identified the following Proposed Actions for the site that are necessary to implement the Waterfront District redevelopment vision.

1. Adopt the 2018 Waterfront District Sub-Area Plan Amendment as an amendment to the City of Bellingham Comprehensive Plan and the Port of Bellingham Comprehensive Scheme of Harbor Improvements.
2. Amend the Waterfront District Planned Action Ordinance with an updated table of required mitigation measures, consistent with those identified in the Final Environmental Impact Statement and 2018 Addendum to the EIS, to assist potential developers and agency regulators in the processing of permit applications for projects within the Waterfront District.
3. Continue to implement the established process which requires mitigation measures identified in the Final Environmental Impact Statement for anticipated impacts associated with specific types of actions to be implemented either before or concurrent with the specific action.
4. Continue the established partnership structure, with representatives from both the Port of Bellingham and City of Bellingham, working together for long-term cooperation in the phased installation of public infrastructure and mitigation implementation.
5. Updated the Development Agreement and associated Development Regulations to establish clear, predictable standards and review procedures for development.
6. Amend the Interlocal Agreement for Facilities within the Waterfront District to clarify the roles and responsibilities of the City and Port to implement the Waterfront District Sub-Area Plan.

7. Update the Waterfront District Permit Handbook, which describes the efficient permitting process, predictable time lines and determinations, for both prospective developers and the local community, for review and approval of Waterfront District development projects that are consistent with the Sub-Area Plan.
8. Prepare more detailed park and infrastructure plans, with additional opportunities for public input, as specific parks and public spaces are designed and funded.
9. Periodically review the Waterfront District Sub-Area Plan and prepare amendments to the plan and development regulations, at least every ten years, to respond to development trends or changes in technology.

ENVIRONMENTAL REVIEW / ALTERNATIVES

To date, five environmental review documents under the State Environmental Policy Act (SEPA) have been issued for public review and comment by the Port in support of the Waterfront District Redevelopment Project. They are a Draft EIS issued in January 2008 (2008 DEIS), a Supplemental Draft EIS issued in October 2008 (2008 SDEIS), an EIS Addendum issued in February 2010 (2010 EIS Addendum), a Final EIS issued in July 2010 (2010 FEIS), and an EIS Addendum issued in December 2012 (2012 EIS Addendum). These documents are available for review on the Port of Bellingham website or can be requested from the Port of Bellingham:

www.portofbellingham.com/waterfrontdistrict/background.

A brief description of the five SEPA environmental review documents issued for the Waterfront District is provided in Chapter 2 of this 2018 EIS Addendum.

LOCATION

The Waterfront District lies within the City of Bellingham's City Center Neighborhood Planning area. The site is generally bounded by Bellingham Bay to the west, Roeder Avenue and State Street to the north and east, and the BNSF railroad corridor and bluff to the south. The City Center Neighborhood is generally bounded by the Columbia and Lettered Streets neighborhoods to the north; the Sunnyland and York neighborhoods to the east, and Cornwall Avenue and the Sehome and South Hill neighborhoods to the south.

PROPONENT/APPLICANT

Port of Bellingham

LEAD AGENCY

Port of Bellingham

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NEEDED PERMITS AND APPROVALSPort of Bellingham

- Approval of amendments to Port of Bellingham *Comprehensive Scheme of Harbor Improvements*.
- Approval of amendment to the Development Agreement between the Port of Bellingham and City of Bellingham. The Development Agreement will reference the implementing regulations for the site, along with infrastructure requirements, phasing and development standards.
- Approval of an amendment to the Interlocal Agreement for Facilities within the Waterfront District to update the phasing and triggers for installation of infrastructure.

City of Bellingham

- Adoption of an amendment to the Waterfront District Subarea Plan as an element of the City Comprehensive Plan.
- Amend the Waterfront District Planned Action Ordinance to reflect updated table of mitigation
- Approval of amendment to the Development Agreement between the Port of Bellingham and City of Bellingham. The Development Agreement will reference the implementing regulations for the site, along with infrastructure requirements, phasing and development standards.
- Adoption of updated Development Regulations and Design Standards for the Waterfront District.

- Approval of an amendment to the Interlocal Agreement for Facilities within the Waterfront District to update the phasing and triggers for installation of infrastructure.
- Approval of future permits for infrastructure improvements, construction projects, and redevelopment activities within the Waterfront District over the buildout period potentially including, but not limited to:
 - Shoreline Management Act Substantial Development Permit Approval
 - Grading Permit Approval
 - Building Permit Approval
 - Mechanical Permit Approval
 - Plumbing Permit Approval
 - Electrical Permit Approval
 - Fire System Permit Approval
 - Street and other City Right-of-Way Use Permit Application Approval
 - Transportation Concurrency Application Approval
 - Stormwater Management Plan Approval

State of Washington

Department of Ecology

- Section 401 Water Quality Certification
- Shoreline Substantial Development Permit Approval
- Coastal Zone Management Certification
- Model Toxics Control Act (MTCA) Compliance

Department of Archaeological and Historical Preservation

- Executive Order 05-05 Consultation and Review

Department of Fish and Wildlife

- Hydraulic Project Approval

United States Army Corps of Engineers

- Section 401 Permit Approval
- Section 402 NPDES Permit Approval
- Section 10/ Section 404 Permit Approval
- Puget Sound Dredged Material Management Program Approval
- Section 106 Consultation and Review

**EIS ADDENDUM AUTHORS
AND PRINCIPAL
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**PREVIOUS ENVIRONMENTAL
DOCUMENTS**

Per WAC 197-11-620, this EIS Addendum supplements the four SEPA environmental review documents issued by the Port of Bellingham, including the 2008 DEIS, 2008 SDEIS, 2010 EIS Addendum, 2010 FEIS, and 2012 EIS Addendum (refer to Chapter 2 of this EIS Addendum for a brief discussion on each of the documents). This EIS Addendum together with the 2008 DEIS, 2008 SDEIS, 2010 EIS Addendum, 2010 FEIS, and 2012 EIS Addendum comprehensively address the environmental impacts of the Proposed Action.

This EIS Addendum builds upon and incorporates by reference the following environmental documents: Department of Ecology, *Bellingham Bay Comprehensive Strategy Draft EIS*, July 1999; Department of Ecology, *Bellingham Bay Comprehensive Strategy Final EIS*, October 2000; Port of Bellingham, *SEPA Checklist for a Proposed Amendment to the Comprehensive Scheme of Harbor Improvements for Squalicum Harbor*, April 2004; City of Bellingham, *Final Environmental Impact Statement for: The City of Bellingham, Bellingham Urban Growth Area, Five-Year Review Areas and Whatcom County Urban Fringe Subarea*, July 2004; Department of Ecology, *Draft Supplemental Environmental Impact Statement: Bellingham Bay Comprehensive Strategy, Whatcom Waterway Cleanup Site*, October 2006; Department of Ecology, *Final Supplemental Environmental Impact Statement: Bellingham Bay Comprehensive Strategy, Whatcom Waterway Cleanup Site*, September 2007. The above documents were also incorporated by reference in the 2008 DEIS, 2008 SDEIS, 2010 EIS Addendum, 2010 FEIS, and 2012 EIS Addendum.

These documents are available for review at the Port of Bellingham, 1801 Roeder Avenue, Bellingham, WA 98225.

LOCATION OF BACKGROUND INFORMATION

Background material and supporting documents are available at the Port of Bellingham, WA 1801 Roeder Avenue, Bellingham, WA 98225 and at the City of Bellingham Planning Office, 210 Lottie Street, Bellingham, WA 98225.

DATE OF FINAL EIS ADDENDUM ISSUANCE

February 12, 2019

AVAILABILITY OF THE FINAL EIS ADDENDUM

The Final EIS Addendum has been distributed to agencies, organizations and individuals noted on the Distribution List. A copy of the Final EIS Addendum is also available for review at the following location:

- Port of Bellingham, 1801 Roeder Avenue, Bellingham, WA

The Final EIS Addendum can be reviewed and downloaded at the Port's web site under Waterfront District at:
<http://www.portofbellingham.com>.

Questions regarding obtaining a copy of the Final EIS Addendum should be directed to Greg McHenry at (360) 676-2500 or by e-mail at:
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THE WATERFRONT DISTRICT REDEVELOPMENT PROJECT
2018 EIS ADDENDUM
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Summary

CHAPTER 1

SUMMARY

1.1 Introduction

This chapter provides a summary of the Waterfront District Redevelopment Project 2018 EIS Addendum. It briefly describes the proposed *2018 Sub-Area Plan* and project history, and also provides an overview of the probable significant environmental impacts, mitigation measures, and significant unavoidable adverse impacts of the proposed *2018 Sub-Area Plan*. See **Chapter 2** of this EIS Addendum for a more detailed description of the proposed *2018 Sub-Area Plan*, and **Chapter 3** for a detailed presentation of probable significant impacts, mitigation measures and significant unavoidable adverse impacts.

Many of the redevelopment assumptions under the proposed *2018 Sub-Area Plan* are the same as those described in the 2012 EIS Addendum for the 2013 Sub-Area Plan. Similar to the 2013 Sub-Area Plan, the proposed *2018 Sub-Area Plan* is intended to be a medium density, sustainable development that features a diversity of uses that are complimentary to the downtown Bellingham City Center, Old Town, and surrounding neighborhoods; an infrastructure network that integrates with and connects the waterfront to the surrounding area; and, a system of parks, trails and open space that opens up the waterfront to the community.

In many respects, the redevelopment assumptions supporting the proposed *2018 Sub-Area Plan* are similar to or less than that described for the 2008 Draft EIS, 2008 Supplemental Draft EIS, 2010 Preferred Alternative in the 2010 EIS Addendum, 2010 FEIS, and 2012 EIS Addendum.

The redevelopment assumptions underlying the proposed *2018 Sub-Area Plan* that have been modified/updated from the 2012 EIS Addendum are:

- Modified street grid in the Downtown Waterfront Area to reflect extension of existing street grid in adjacent neighborhoods.
- Modified internal boundary between Downtown Waterfront/Log Pond Area to better accommodate adaptive reuse of the Board Mill Building.
- Updated view corridors to better align with Downtown Waterfront Area street grid.
- Updated layout of parks, open space and trails to complement proposed street grid, open space and development areas, and provide better pedestrian/bike access.
- Modified roadway improvements and phasing to reflect proposed street grid and building square footage to maintain traffic concurrency.
- Updated structures which may be retained to reflect Granary Building construction, and interest in redevelopment of the Board Mill and Alcohol Plant buildings.

Refer to **Chapter 2** for further details on the proposed *2018 Sub-Area Plan*.

Based on those redevelopment assumptions that have not changed and those assumptions that have been modified under the proposed 2018 Sub-Area Plan, the following environmental

analyses in the 2008 DEIS, 2008 SDEIS, 2010 EIS Addendum, 2010 FEIS, and 2012 EIS Addendum will not change:

- Earth
- Air Quality and GHG Emissions
- Water Resources
- Plants and Animals
- Environmental Health
- Population, Employment and Housing
- Public Services
- Utilities

For those assumptions that have been modified under the proposed *2018 Sub-Area Plan*, an updated analysis for those associated environmental elements is provided in this EIS Addendum. They are:

- Land Use
- Relationship to Plans/Policies
- Historic and Cultural Resources
- Aesthetics
- Transportation

1.2 Project History

This document is an Addendum to the 2008 Draft EIS (2008 DEIS), the 2008 Supplemental Draft EIS (2008 SDEIS), the 2010 EIS Addendum, the 2010 Final EIS (2010 FEIS), and the 2012 EIS Addendum prepared for the Waterfront District Redevelopment Project (referred to herein as “previous EIS documents”). The 2008 DEIS evaluated three redevelopment alternatives and their environmental impacts and associated mitigation measures. The 2008 DEIS recognized that features of the alternatives could be mixed and matched to arrive at the final Master Plan Development for the Waterfront District.

The 2008 SDEIS evaluated two redevelopment alternatives (2008 Preferred Alternative and Straight Street Grid Option) and the environmental impacts and associated mitigation measures with each alternative. The 2008 Preferred Alternative represented further refinement of the 2008 DEIS Alternatives in the following areas: redevelopment density and mix of uses; roadway system; grading/stormwater management concept; parks and shoreline habitat plan; in-water work; sustainable design strategies; historic buildings; view corridors; and, development regulations.

Subsequent to the 2008 SDEIS, the 2010 Preferred Alternative was developed based on public input and coordination with the City; the 2010 Preferred Alternative was analyzed as part of the 2010 EIS Addendum. The majority of the redevelopment assumptions were similar to the 2008 Preferred Alternative; however, certain assumptions were modified, including: roadway network, view corridors, historic buildings/structures; and, the status of the PSE Encogen Plant.

In July 2010, the Final EIS for the project (2010 FEIS) was issued which included a description of the 2010 Preferred Alternative (same as described in the 2010 EIS Addendum) and responses to comments received throughout the EIS process.

The 2012 EIS Addendum reflected updates to the 2010 Preferred Alternative described and analyzed in the 2010 Final EIS. The primary updates identified and analyzed in the EIS Addendum related to an increase in the overall site area, proposed land uses and phasing, building heights and view corridors, parks and open space, roadway improvements, historic

buildings and structures, and overwater coverage. The Preferred Alternative described and analyzed in the 2010 EIS Addendum formed the basis of the Master Development Plan, Development Regulations, and 2013 Sub-Area Plan.

1.3 Summary of Impacts, Mitigation Measures, and Significant Unavoidable Adverse Impacts

The following summary highlights the impacts, mitigation measures, and significant unavoidable adverse impacts that could potentially result from redevelopment of the Waterfront District under the proposed Sub-Area Plan. Mitigation measures identified in the previous EIS documents apply to the proposed *2018 Sub-Area Plan*. This summary is not intended to be a substitute for the complete discussion of each environmental element that is contained in **Chapter 3** of this EIS Addendum.

Land Use

Impacts

Land use-related impacts under the proposed *2018 Sub-Area Plan* are similar to or less than those identified in previous Waterfront District EIS documentation¹. In general, the proposed level of redevelopment under the *2018 Sub-Area Plan* is similar to or less than the level analyzed in the previous EIS documents. The proposed adjustments in the street grid and total amount of office and retail uses on the site is not anticipated to result in the potential for additional land use impacts. With the implementation of the mitigation measures identified in the previous EIS documents, no additional significant land use-related impacts are anticipated.

Significant cumulative land use impacts with redevelopment of the Waterfront District site in conjunction with development in the area are not anticipated.

Mitigation Measures

Mitigation measures were identified in the EIS as part of the previous EIS documents, and these measures also apply to the proposed *2018 Sub-Area Plan*. Because no additional significant impacts were identified, no additional mitigation measures are warranted.

Significant Unavoidable Adverse Impacts

With the implementation of mitigation measures identified in the previous EIS documents, no significant unavoidable adverse land use-related impacts are anticipated.

Relationship to Plans and Policies

Similar to that described in the previous EIS documents, the proposed *2018 Sub-Area Plan* is generally consistent with applicable local and state policies and regulations. Redevelopment

¹ Including 2008 Draft EIS, 2010 Supplemental Draft EIS, 2010 Final EIS and 2012 EIS Addendum.

under the proposed *2018 Sub-Area Plan* is similar to that analyzed in the previous SEPA environmental review documents in that it is intended to be a medium density, sustainable development that features a diverse mix of land uses that would be complimentary to Downtown Bellingham and the surrounding neighborhoods. As such, the proposed *2018 Sub-Area Plan* is consistent with applicable local and state plans, policies and regulations

Historic and Cultural Resources

Impacts

Historic and cultural resource impacts under the proposed *2018 Sub-Area Plan* are similar to those identified in the previous EIS documentation, due to the similar nature of proposed redevelopment in the Waterfront District and the continued status of buildings/structures that are retained for possible adaptive reuse. With implementation of the mitigation measures identified in the previous EIS documents, no additional historic or cultural resource-related impacts are anticipated.

Significant cumulative historic resources impacts with redevelopment of the Waterfront District site in conjunction with development in the area are not anticipated.

Mitigation Measures

Mitigation measures were identified in the EIS as part of the 2008 Draft EIS and 2008 Supplemental Draft EIS, and these measures also apply to the proposed *2018 Sub-Area Plan*. Because no additional significant impacts were identified, no additional mitigation measures are warranted.

Significant Unavoidable Adverse Impacts

With the implementation of mitigation measures identified in the 2008 Draft EIS and 2008 Supplemental Draft EIS, no additional significant unavoidable adverse historic or cultural resource-related impacts are anticipated.

Aesthetics

Impacts

Aesthetic impacts under the proposed *2018 Sub-Area Plan* are anticipated to be similar to or less than those identified in previous EIS documents. In general, the proposed level of redevelopment and building heights under the proposed *2018 Sub-Area Plan* is similar to or less than conditions analyzed in previous Waterfront District EIS documentation. The street grid under the proposed *2018 Sub-Area Plan* would allow for view corridors allowing views of and through the Waterfront District site and providing visual connections to Bellingham Bay and other surrounding areas; additional view impacts are not anticipated. With the implementation of mitigation measures identified in previous EIS documents, no significant aesthetic impacts would be anticipated.

Significant cumulative aesthetic impacts with redevelopment of the Waterfront District site in conjunction with development in the area are not anticipated.

Mitigation Measures

Mitigation measures were identified in the EIS as part of the 2008 Draft EIS and 2008 Supplemental Draft EIS, and these measures also apply to the proposed *2018 Sub-Area Plan*. Because no additional significant impacts were identified, no additional mitigation measures are warranted.

Significant Unavoidable Adverse Impacts

With the implementation of mitigation measures identified in the 2008 Draft EIS and 2008 Supplemental Draft EIS, no significant unavoidable adverse aesthetic impacts are anticipated.

Transportation

Impacts

Transportation-related impacts under the proposed *2018 Sub-Area Plan* are the same or less than those identified in the previous EIS documents. In general, the proposed level of redevelopment under the proposed *2018 Sub-Area Plan* will generate fewer trips than the level analyzed for the 2013 Sub-Area Plan in the 2012 EIS Addendum. The proposed roadway network, access and circulation are similar to the previous Preferred Alternative Straight Street Grid Option and as such, potential transportation-related impacts are anticipated to be the same as or less than those identified for the previous Preferred Alternatives and no new significant transportation-related impacts are anticipated.

Significant cumulative transportation impacts with redevelopment of the Waterfront District site in conjunction with development in the area are not anticipated.

Mitigation Measures

Mitigation measures were identified in the previous EISs and these measures apply to the proposed *2018 Sub-Area Plan*. Because no additional significant transportation impacts were identified, no additional mitigation measures have been identified. Similar to the 2013 Sub-Area Plan, transportation infrastructure improvements would be phased under the proposed *2018 Sub-Area Plan* to keep pace with proposed redevelopment of the Waterfront District.

Tables 3.4-2 and 3.4-3 in Chapter 3 of this EIS Addendum summarize the on-site and off-site improvements and the level of development that could be accommodated with the improvements for each phase. The phasing examines the Marine Trades area separate from the Downtown Waterfront, Log Pond, Shipping Terminal, and Cornwall Beach redevelopment areas. The capacity of the transportation system is based on the total outbound PM peak hour vehicular capacity (i.e., existing on-site vehicle trips plus net new project-related vehicle trips). The outbound direction generates the highest demand during the PM peak hour for the assumed set of land uses. This capacity represents the maximum number of outbound weekday PM peak hour trips that could be accommodated with the assumed infrastructure improvements. The approximate square-feet of development related to the outbound vehicle trip threshold is presented in the tables. The proposed land use and associated trip generation is also presented in **Tables 3.4-2 and 3.4-3** of Chapter 3 of this EIS Addendum to provide an understanding of how the 2018 proposal compares to the anticipated infrastructure capacity.

While the specific phasing of transportation infrastructure improvements has been slightly modified to reflect changes to the proposal under the proposed *2018 Sub-Area Plan*, the proposed phasing plan ensures that transportation infrastructure improvements keep pace with development on the site. The biennial monitoring system would be used to affirm that the transportation improvements are sufficient to accommodate the anticipated trip generation.

Significant Unavoidable Adverse Impacts

As described in the previous EIS documents, the proposed *2018 Sub-Area Plan* accommodates additional amounts of future development within the site which contributes to travel demands and congestion along the onsite and offsite street system. The additional development and associated improvements also increases traffic access and circulation in the area. Without mitigation, this added congestion would contribute to measurably poorer performance of the transportation network, in terms of increased delays along several of the corridors and at some specific intersections. The increase in traffic and higher volumes of pedestrians and bicycles would result in more conflict points and increased hazards to safety. With the implementation of the identified mitigation measures, significant unavoidable adverse impacts would be prevented or substantially lessened so that no new significant unavoidable adverse impacts are anticipated under the proposed *2018 Sub-Area Plan*.

Description of the Waterfront District 2018 Sub-Area Plan

CHAPTER 2

DESCRIPTION OF THE WATERFRONT DISTRICT 2018 SUB-AREA PLAN PROJECT

This chapter of the Updated Waterfront District *2018 Sub-Area Plan* Project Final EIS Addendum provides: **1)** a description of the proposed Waterfront District *2018 Sub-Area Plan* Amendment (*2018 Sub-Area Plan*) and how the *2018 Sub-Area Plan* relates to the EIS Alternatives evaluated in the previous SEPA environmental review documents prepared for the Waterfront District Redevelopment Project; **2)** a summary of the environmental review documents (SEPA documents) issued for the project to date; **3)** a summary of the Proposed Actions analyzed in the EIS Addendum; **4)** a listing of the elements of the environment analyzed in this EIS Addendum; **5)** discussion on the intent of an EIS Addendum under SEPA and why it is being prepared; and, **6)** discussion on the environmental review and decision-making process after this 2018 EIS Addendum. Key concepts related to this 2018 EIS Addendum are presented below in question and answer format.

2.1 BACKGROUND

Q1. *What is the 2018 Sub-Area Plan Amendment and how does it relate to the plan included in the Waterfront District Sub-Area Plan adopted in 2013?*

A1. The Waterfront District Sub-Area Plan describes a long-term redevelopment project which will convert an under-utilized Brownfields industrial site on the Bellingham waterfront to a vibrant mixed-use neighborhood, and restore three miles of shoreline for habitat and public access. The Waterfront Futures Group charted the course when they completed the Vision and Framework Plan for the Central Waterfront in 2004. The City and Port have been working together over the past fourteen years to complete the detailed planning, environmental review, development regulations and implementation strategies to allow this vision to move forward.

The initial Waterfront District Sub-Area Plan, Development Regulations, Development Agreement, Planned Action Area Ordinance and Interlocal Agreement for Facilities were adopted in December, 2013. This set of documents established five planning areas, a network of roads, trails and parks, development regulations and design standards to guide development, and agreements between the Port and City to clarify the roles and responsibilities of the Port and City to implement the plan.

The Port of Bellingham entered into a Master Development Agreement with Harcourt Bellingham LLC. to develop a portion of the Downtown Waterfront area, and Harcourt Bellingham is making progress to redevelop the historic Granary Building. Several additional development projects are proposed. The Port has completed cleanup and bank restoration projects in the Downtown Waterfront to prepare this area for redevelopment, and the City is constructing the roads, utilities and parks to serve the first phase of development.

The proposed 2018 amendment to the Sub-Area Plan, Development Regulations and agreements was jointly developed by the Port of Bellingham and Harcourt Bellingham, LLC, with input from City staff and the public. These amendments would modify the location and alignment of several roads, parks and view corridors to improve access to and through the site and better support proposed development projects

Similar to that described in the previous SEPA environmental review documents prepared for the Waterfront District, redevelopment under the proposed *2018 Sub-Area Plan* is intended to be a medium density, sustainable development that features a diversity of uses that are complimentary to the downtown Bellingham City Center, Old Town, and surrounding neighborhoods; an infrastructure network that integrates with and connects the waterfront to the surrounding area; and, a system of parks, trails and open space that opens up the waterfront to the community. The proposed *2018 Sub-Area Plan* is intended to be consistent with the Port of Bellingham and City of Bellingham objectives, as defined in the previous EIS documents; refer to Question 5 of this Chapter for a listing of the Proposed Actions.

Table 2-1 provides a listing of the topics associated with modifications to the 2013 Sub-Area Plan proposed under the proposed *2018 Sub-Area Plan*, how the topics were described under the 2013 Sub-Area Plan, and how the topics are proposed to be modified under the *2018 Sub-Area Plan*.

Table 2-1
SUMMARY OF PROPOSED CHANGES UNDER PROPOSED 2018 SUB-AREA PLAN

Topic	2013 Master Plan	Proposed 2018 Amendment	Reason for Change
Land Uses by Category			
Residential	1,975,000 Square Feet (1,646 housing units @ 1,200 sf/unit)	1,975,000 Square Feet (1,646 housing units @ 1,200 sf/unit)	No change
Office	1,420,000 Square Feet	1,510,000 Square Feet, which is an increase of 90,000 square feet.	Increased office space is to balance decreased retail to address projected demand.
Industrial	1,530,000 Square Feet	1,530,000 Square Feet	No change
Retail	330,000 Square Feet	285,000 Square Feet, which is a reduction of 90,000 square feet.	Decreased retail space is to address projected demand.
Building Square Ft at Full Build-out	5,300,000 Square Feet	5,300,000 Square Feet	No change

Topic	2013 Master Plan	Proposed 2018 Amendment	Reason for Change
Transportation Map	Granary Ave, Bloedel Ave, Commercial Street and Log Pond Drive were arterial roads aligned at a 45° angle from the Downtown street grid. The BNSF rail was proposed to relocate in Phase 5, followed by a potential Wharf St closure.	Granary Ave and Laurel Street arterial streets are under construction, aligned to match the Downtown road grid. Commercial Street, the Commercial St. bridge and Log Pond Drive arterial were eliminated. A parking garage entrance and stairway is proposed from the top of the bluff at Bay Street. The BNSF rail is still proposed to relocate in Phase 5.	Granary Ave. and Laurel Street were designed to better serve proposed development and support reuse of the Boardmill Building. A parking garage entrance and stairway at the top of the bluff at Bay Street would allow direct vehicle and pedestrian access from Downtown and reduce vehicle traffic in the Waterfront District.
Transportation Phasing	Granary Ave, Interim Bloedel and Interim Laurel were proposed in Phase 1. The Commercial Street Bridge and arterial were Phase 3. Rail relocation and Wharf St closure were Phase 5.	Granary Ave. and Laurel Street are under construction. Bay Street Garage and stairway is proposed in Phase 3. Rail relocation is proposed in Phase 5.	Infrastructure phasing will be tied to building square footage to maintain traffic concurrency.
View Corridors	View corridors were proposed at F Street, Central Avenue, Commercial Street, Cornwall Avenue and Oak Street, with angled view corridors in the Commercial Street Green, Bloedel Ave and Log Pond Drive.	No change is proposed to the F Street, Central Ave, Commercial Street, Cornwall Ave. and Oak Street view corridors. The angled view corridors at Commercial Green, Bloedel Ave and Log Pond Drive are replaced with new view corridors along Granary Ave, Maple St. and Laurel St.	The proposed view corridors better align with the arterial roads and development pads. New corridors preserve views to Bellingham Bay and historic buildings and icons from Downtowns.
Building Heights and Floor Area Ratios (FAR)	Maximum building heights of 35 to 50 feet were permitted in shoreline jurisdiction. 100 feet to 200 feet were permitted in upland areas. Building height were further restricted by Floor Area Ratios and design regulations.	Building heights and Floor Area Ratios are the same as the 2013 plan, but the boundaries between the various height and FAR areas have been modified to match roads, parks and development pads	The proposed boundaries between the various height and FAR areas match the proposed roads, parks and development pads.
Park Location and Acreage	33 acres of dedicated public park were proposed, with a large central park in the Downtown, aligned with Commercial Street.	At least 33 acres will be dedicated as public park. An additional 3 acres may be jointly used for public open space, habitat,	The updated alignment complements the proposed roads, view corridors and

Topic	2013 Master Plan	Proposed 2018 Amendment	Reason for Change
		outdoor seating, utilities, stormwater management or public plazas above structured parking.	development areas, and provides better pedestrian and bike access through the Downtown Waterfront.
Structures Which May Be Maintained	The Bellingham Shipping Terminal would be retained. The Granary Building, Boardmill and East half of the Alcohol Plant were temporarily held for adaptive reuse assessment and the Chip Bins, Digester Tanks and Ceramic Tank icons were held for future assessment.	The Bellingham Shipping Terminal and Granary Building will still be retained. The Boardmill and Alcohol Plant are temporarily held for adaptive reuse assessment. The Chip Bins have been demolished, and the Digester Tanks, Ceramic Tanks, and Chipper icons are held for future assessment.	The Granary Building is under construction reuse, and developers have expressed interest in redeveloping the Boardmill and Alcohol Plant. The proposed street grid better supports reuse of these structures.
Parking Strategy	Approximately 7,000 parking spaces were projected. One third would be surface lots, one third would be on-street and one third would be in parking structures.	Approximately 7,000 parking spaces are still projected. The proposed parking garage at Bay Street may reduce the demand for surface parking at full buildout.	Structured parking along the bluff is a more efficient use of land at full build-out, and an entrance from the top of the bluff will reduce vehicle traffic within the Waterfront District.
Shoreline Mater Program	Final Draft SMP was referenced as a draft document. A proposed revision to the Log Pond designation was recommended. Minimum and maximum shoreline setbacks and buffers applied prior to the adoption of Waterfront District Master Plan.	2013 approved SMP and a 2017 revision to the Log Pond designation are referenced. Reference to minimum and maximum shoreline buffers was removed, since the initial Waterfront District Plan was adopted.	City of Bellingham SMP was approved in 2013. Log Pond designation was amended in 2017. Maximum shoreline setbacks no longer apply.
Reference to City Planning Documents	2013 Plan referenced the 2006 Bellingham Comprehensive Plan, 2008 CBD Plan, the Central Waterfront and CBD Urban Villages and Waterfront Mixed-Use Interim zoning.	References were updated to 2016 Bellingham Comp Plan, City Center Neighborhood Plan Waterfront District Urban Village and current zoning.	City Plans and regulations were updated.

Topic	2013 Master Plan	Proposed 2018 Amendment	Reason for Change
Planning Area Boundaries	The Waterfront District was divided into five planning areas with different uses and character.	Five Planning areas are still proposed. The boundary between the Downtown Waterfront and Log Pond area was modified.	The location of the Western Crossing parcel has been relocated to allow adaptive reuse of the Boardmill Building.
Location of Western Crossings Parcel	A six-acre parcel was identified for a future institute of higher education or other institutional or business campus along the southern edge of the Downtown Waterfront Area.	A six-acre parcel is still identified for a future institute of higher education or other institutional or business campus, but the location has been moved further south.	The new location would allow adaptive reuse of the Boardmill Building by a private developer.
ASB marina	The 2013 Sub-Area Plan proposes a Clean Ocean Marina with up to 460 slips in the ASB.	The future use of the ASB is less certain at this time. A Marina or other water-dependent use may be proposed in the ASB.	The Port reconsidering the future use of the ASB and is working with Dept. Ecology to determine the Whatcom Waterway Phase 2 Cleanup.

Source: Port of Bellingham 2018

In many respects, redevelopment under the proposed *2018 Sub-Area Plan* would be similar to or less than that described and analyzed in the previous SEPA environmental review performed for the Waterfront District (see **Table 2-2** for a summary of assumed redevelopment as it relates to previous SEPA environmental review).

Table 2-2
COMPARISON OF ASSUMPTIONS UNDER SEPA DOCUMENTATION

	2008 DEIS¹	2008 SDEIS¹	2012 EIS Addendum	2018 EIS Addendum
Overall Site Area	216.3 acres	216.3 acres	237 acres	237 acres
Development Density	Up to 7.5 million sq. ft.	6 million sq.ft.	5.3 million sq.ft.	5.3 million sq.ft.
Parks and Open Space	33 acres	33 acres	33 acres	33 acres
Housing Units	Up to 3,075	1,892 units	1,646 units	1,646 units
Parking Spaces	Up to 15,863	12,900 spaces	7,000 spaces	7,000 spaces

	2008 DEIS ¹	2008 SDEIS ¹	2012 EIS Addendum	2018 EIS Addendum
Road Grid	Straight street grid	Angled streets with optional Straight Street grid in Downtown Waterfront.	Angled Street grid in Downtown Waterfront.	Straight Street grid in Downtown Waterfront.
View Corridors	None established	View corridors along r-o-w, open space and building height limitations – for both angled and straight street grids.	Similar establishment of view corridors for angled street grid.	Similar establishment of view corridors along straight street road grid, open space and building height limitations.

Source: Port of Bellingham

¹ The 2010 FEIS and 2010 EIS Addendum address similar land use assumptions as the 2008 documents

Q2. What are the specific features of the proposed 2018 Sub-Area Plan?

- A2.** The following provides detail on the site and development characteristics of the proposed *2018 Sub-Area Plan*, including: site boundaries (as well as internal boundaries between the development areas); proposed land uses and phasing; street grid and view corridors; parks, open space/trails; roadway improvements; and, historic structures.

Site Boundary

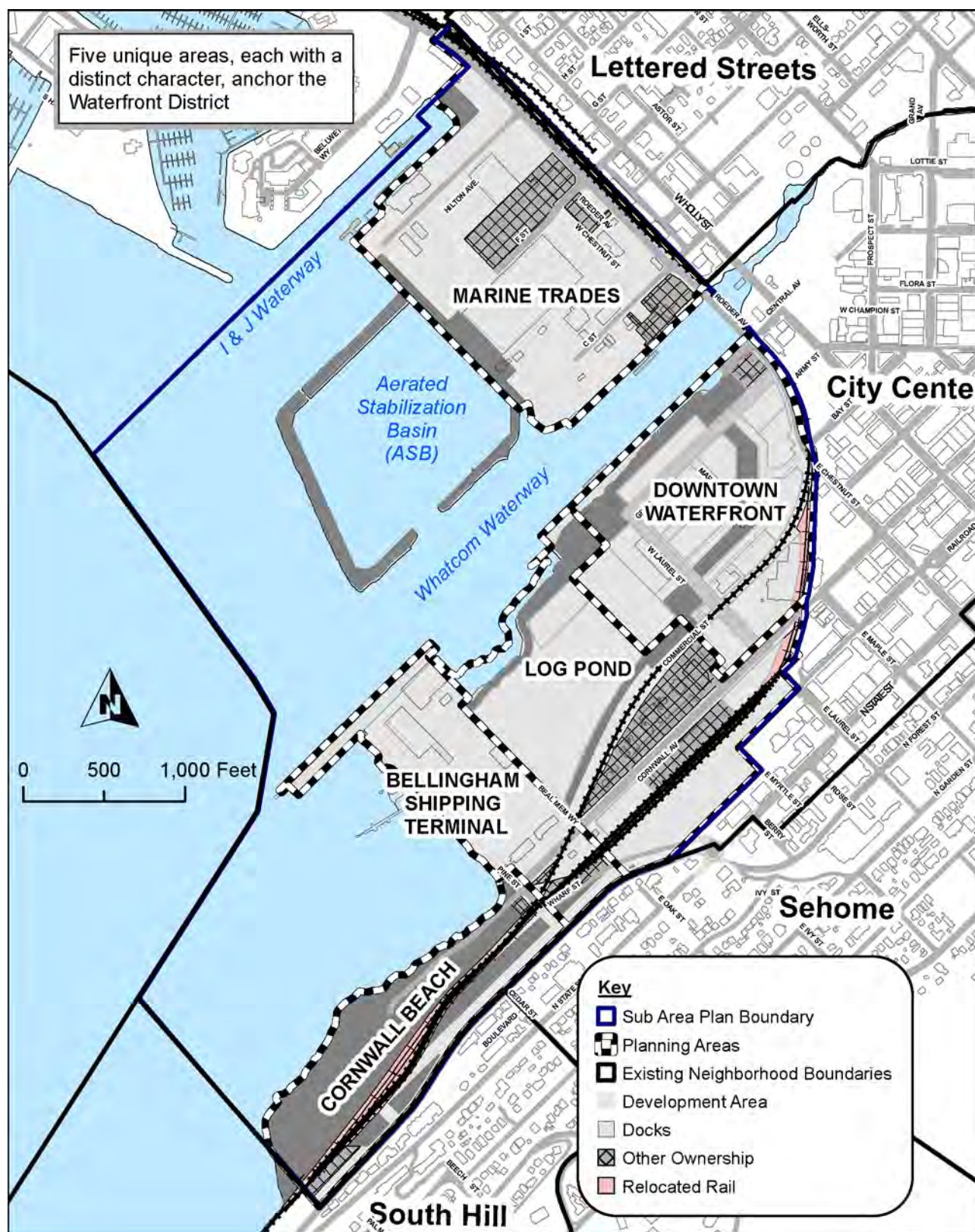
The overall boundary of the Waterfront District site would remain the same as analyzed in the 2012 EIS Addendum and under the 2013 Sub-Area Plan, with the overall Waterfront District site area remaining at 237 acres.

The internal development area boundaries for the Marine Trades, Bellingham Shipping Terminal, and Cornwall Beach Areas would remain the same as under the 2013 Sub-Area Plan. The internal boundary between the Downtown Waterfront Area and the Log Pond Area is proposed to be revised to reflect the straight street grid and better allow for future adaptive reuse of the Board Mill Building. With the proposed boundary adjustment, the Downtown Waterfront Area would be 44 acres in size and the Log Pond Area would be 52 acres. See **Figure 2-1** for a map illustrating the Development Areas under the proposed *2018 Sub-Area Plan* (see Appendix C for the Development Areas Map included in the 2013 Sub-Area Plan for comparison with Figure 2-1).

Land Use and Phasing

As under the 2013 Sub-Area Plan and as analyzed in the 2012 EIS Addendum, the types of land uses on the Waterfront District site would continue to consist of Commercial Mixed-Use, Industrial Mixed-Use, and Industrial Mixed-Use. The location of the various types of land use would remain the same as under the 2013 Sub-Area Plan for the Marine Trades Area, Bellingham Shipping Terminal Area, and Cornwall Beach Area, with the location of the uses in the Downtown Waterfront and Log Pond area

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Source: Port of Bellingham, 2018.

Figure 2-1
2018 Sub-Area Plan Development Area Boundaries

adjusted to reflect the proposed straight street grid and Long Pond Area/Downtown Waterfront Area boundary (see **Figure 2-2** for a map of the land use designations under the *2018 Sub-Area Plan*). The total building square footage of the Downtown Waterfront and Log Pond areas would not change from the 2013 Sub-Area Plan (see Appendix C for the Land Use Designations Map included in the 2013 Sub-Area Plan for comparison with Figure 2-2).

As indicated in **Table 2-1**, in order to address projected demand, total office use under the proposed *2018 Sub-Area Plan* would increase by 90,000 sq.ft., with the total area in retail use correspondingly decreased by 90,000 sq.ft.; thus, the total building square footage in office and retail use on the Waterfront District site would not change from that under the 2013 Sub-Area Plan. The total building square footage associated with residential and industrial use would not change from the 2013 Sub-Area Plan, and total square footage of building development on the site would not increase from that analyzed in the 2012 EIS Addendum and under the 2013 Sub-Area Plan.

The proposed *2018 Sub-Area Plan* also updates the redevelopment phases for redevelopment of the Waterfront District and provides a breakdown of the phased redevelopment for each development area on the site. See **Table 2-3** for a summary of redevelopment of each development area on the site under the proposed *2018 Sub-Area Plan*, and **Table 2-4** for a comparison of building development by use under the proposed *2018 Sub-Area Plan* and the 2013 Sub-Area Plan.

Building Height Limits and View Corridors

Under the proposed *2018 Sub-Area Plan* maximum building heights would be similar to those under the 2013 Sub-Area Plan and analyzed in the 2012 EIS Addendum, and range from 50 feet to 200 feet in height. The tallest buildings in the Waterfront District are located in the Downtown Waterfront Area, immediately adjacent to Downtown Bellingham. The remaining redevelopment areas have maximum building heights that range from 50 feet to 100 feet.

The proposed *2018 Sub-Area Plan* includes eight view corridors, including seven view corridors along a straight street grid in the Downtown Waterfront Area compared to the eight view corridors on an angled grid under the 2013 Sub-Area Plan and analyzed in the 2012 EIS Addendum. View corridor and view conditions under the proposed 2018 Sub Area Plan would be similar to the Straight Street Grid option analyzed in the 2008 Supplemental Draft EIS.

Similar to the 2013 Sub-Area Plan, view corridors under the proposed *2018 Sub-Area Plan* are intended to preserve visual connections towards Bellingham Bay from adjacent neighborhoods. The proposed view corridors are located along street rights-of-way and certain open space areas as illustrated in **Figure 2-3** (see Appendix C for the View Corridors Map included in the 2013 Sub-Area Plan for comparison with Figure 2-3).

**Table 2-3
2018 PROPOSED SUB-AREA PLAN DEVELOPMENT BY PHASE**

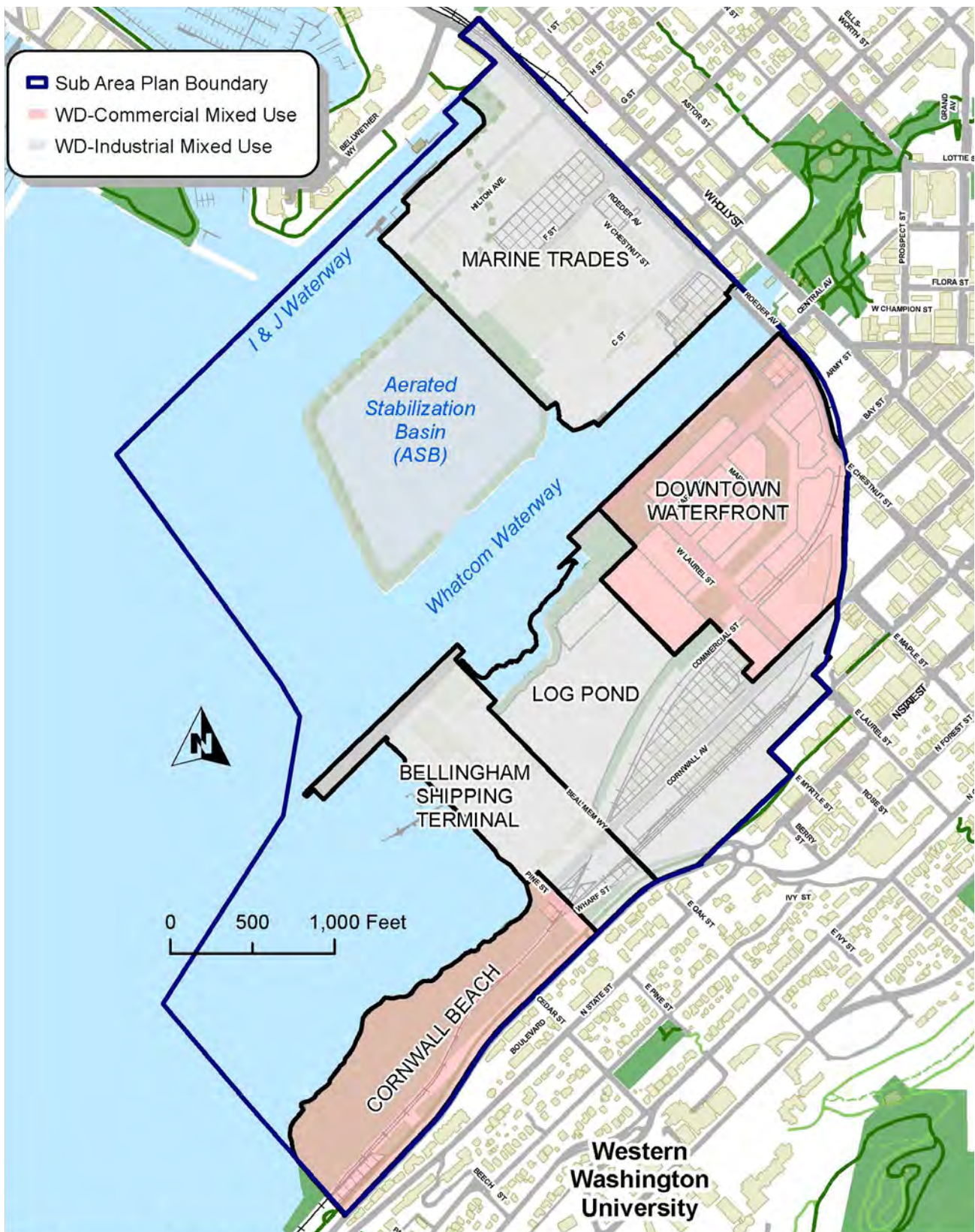
DEVELOPMENT AREA	2013 Existing Development (Bldg Sq Ft)	Phase 1 Development	Phase 2 Development (Bldg Sq Ft)	Phase 3 Development (Bldg Sq Ft)	Phase 4 Development (Bldg Sq Ft)	Phase 5 Development (Bldg Sq Ft)	Cumulative Development (Bldg Sq Ft)
MARINE TRADES	350,000 Ind	50,000 Ind <u>30,000 Office</u> 80,000 Total	50,000 Ind <u>20,000 office</u> 70,000 Total	50,000 Ind	50,000 Ind 80,000 Office <u>20,000 Retail</u> 150,000 Total	450,000 Ind 320,000 Office <u>30,000 Retail</u> 800,000 Total	1,000,000 Industrial 450,000 Office <u>50,000 Retail</u> 1,500,000 Total
DOWNTOWN WATERFRONT	5,800 Office	100,000 Office 300,000 Res <u>100,000 Retail</u> ¹ 500,000 Total	120,000 Office 350,000 Res <u>30,000 Retail</u> 500,000 Total	140,000 Office 330,000 Res <u>30,000 Retail</u> 500,000 Total	140,000 Office 330,000 Res <u>30,000 Retail</u> 500,000 Total	494,200 office 315,000 Res <u>18,000 Retail</u> 827,200 Total	1,000,000 Office 1,625,000 Res <u>208,000 Retail</u> 2,833,000 Total
CORNWALL BEACH	7,000 Office			45,000 Res. <u>5,000 Retail</u> 50,000 Total	50,000 Res.	5,000 Office <u>255,000 Res</u> 260,000 Total	10,000 Office 350,000 Res <u>7,000 Retail</u> 367,000 Total
LOG POND	102,500 ind			50,000 Ind	50,000 Ind.	47,500 Ind <u>50,000 office</u> 97,500 total	250,000 Industrial <u>50,000 office</u> 300,000 total
SHIPPING TERMINAL	105,200 Ind				50,000 Ind	124,800 Ind <u>20,000 Retail</u> 144,800 total	280,000 Industrial <u>20,000 Retail</u> 300,000 Total
CUMULATIVE NORTH OF WATERWAY	350,000 SF	430,000 SF	500,000 SF	550,000 SF	700,000 SF	1,500,000 SF	1,500,000 SF
CUMULATIVE SOUTH OF WATERWAY	220,500 SF	720,500 SF	1,220,500 SF	1,820,500 SF	2,470,500 SF	3,800,000 SF	3,800,000 SF
COMBINED CUMULATIVE (North + South)	570,500 SF	1,150,500 SF	1,720,500 SF	2,370,500 SF	3,170,500 SF	5,300,000 SF	5,300,000 SF

¹ Retail uses include restaurants, drinking establishments, hospitality and personal services.

Table 2-4
COMPARISON OF LAND USES UNDER THE PROPOSED 2018 SUB-AREA PLAN AND 2013 SUB-AREA PLAN

	2013 Master Plan (2012 EIS Addendum) Building Square feet at build-out	Proposed 2018 Amendment Building Square feet at build-out	Decrease/Increase from 2013 (Percentage of 2013 sq ft)
Land Use by Category			
Residential	1,975,000 Square Feet (1,646 housing units @ 1,200 sf/unit)	1,975,000 Square Feet (1,646 housing units @ 1,200 sf/unit)	No change (100%)
Office	1,420,000 Square Feet	1,510,000 Square Feet	90,00 SF Increase (1.06%)
Industrial	1,530,000 Square Feet	1530,000 Square Feet	No change (100%)
Retail	375,000 Square Feet	285,000 Square Feet	90,000 Decrease (76%)
Building Square Footage			
Building Square feet North of Whatcom Waterway	1,500,000 Square Feet	1,500,000 Square Feet	No change (100%)
Building Square feet North of Whatcom Waterway	3,800,000 Square Feet	3,800,000 Square Feet	No change (100%)
Total Building Square Feet	5,300,000 Square Feet	5,300,000 Square Feet	No change (100%)

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Source: Port of Bellingham, 2018.

Figure 2-2
2018 Sub-Area Plan Land Uses

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Science, and
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Figure 2-3
2018 Sub-Area Plan View Corridors

View corridors under the proposed *2018 Sub-Area Plan* are located along street rights-of-way through the site, as well as certain open space areas as follows:

- F Street
- Central Avenue
- Granary Avenue
- Bay Street
- Commercial Street
- Cornwall Avenue
- W. Laurel Street
- Oak Street

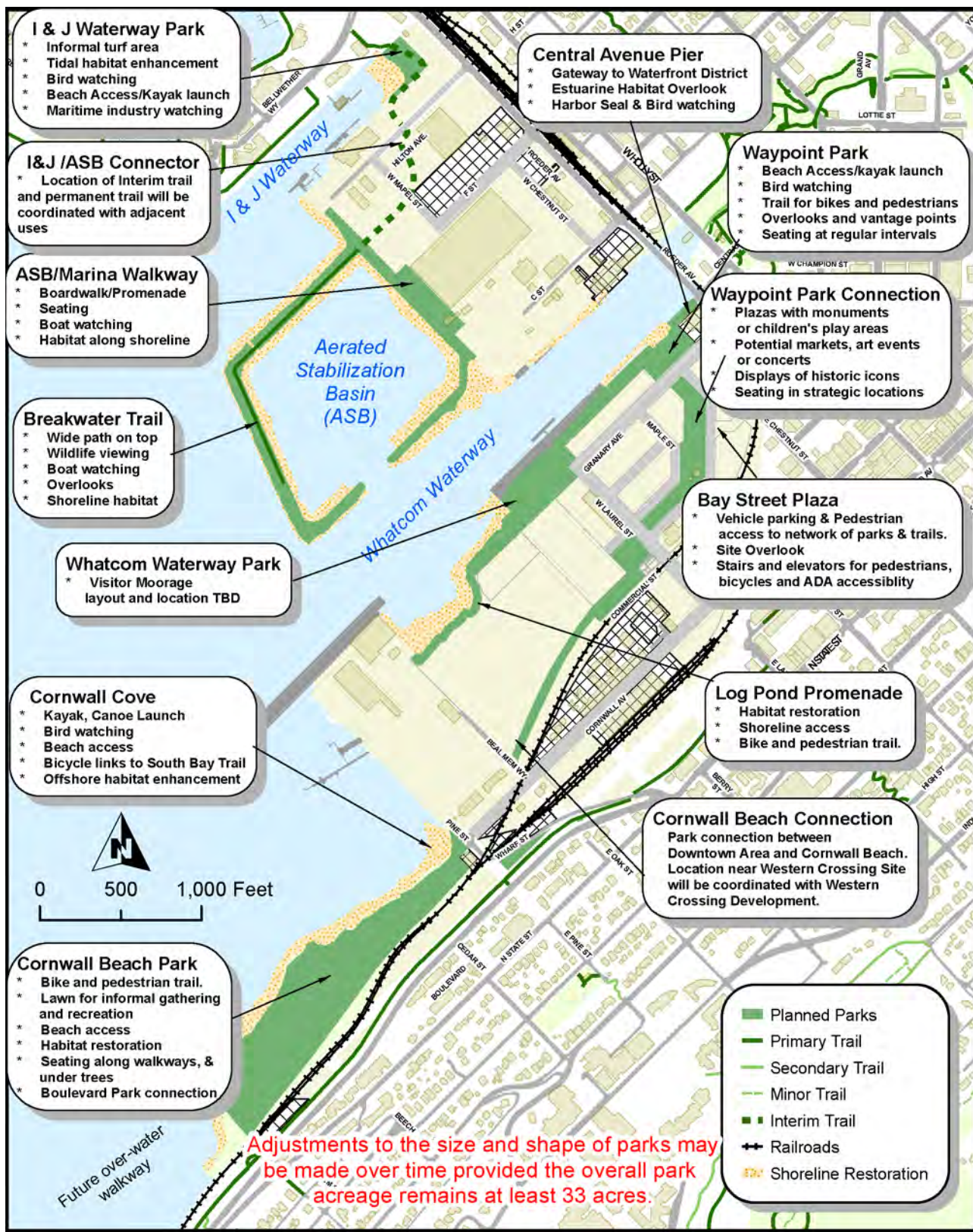
Parks, Open Space and Trails

The 2008 Draft EIS and 2008 Supplemental Draft EIS described and analyzed existing parks, open space, and recreational facilities in the City of Bellingham, as well as those proposed in the Waterfront District; the 2008 DEIS also discussed the City's parks and recreational facilities LOS guidelines and impact fees. Relative to the existing conditions, the 2013 Sub-Area Plan provided substantial increases in parks, trails, habitat restoration areas, and waterfront access. The 2013 Sub-Area Plan included approximately 33 acres of new parks, trail and habitat areas on the Waterfront District site, which were intended to provide new opportunities for recreation and access to the waterfront for residents/employees and the community. The new trails were intended to complete links to surrounding area parks and trails, as well as connect neighborhood areas in the City.

Similar to the 2013 Sub-Area Plan, the proposed *2018 Sub-Area Plan* includes approximately 33 acres of new upland parks and trails, as well as approximately 6.5 acres of restored public beach areas (an increase of 0.5 acre of restored beach area compared to the 2013 Sub-Area Plan). An additional three acres may be jointly used for public open space, habitat, outdoor seating, utilities, stormwater management, or public plazas above structured parking.

Parks and trails in the Waterfront District link Downtown Bellingham and adjacent neighborhoods to the waterfront and create new areas for the community to walk, play and experience the waterfront. Parks, open spaces and trails serve as an important linkage in developing a regional system of waterfront parks and trails. **Table 2-5** provides a summary of parks, trails and open space areas in the Waterfront District by redevelopment area. See **Figure 2-4** for a general mapping of the proposed parks, trails and open space area (see Appendix C for the Parks, Trails and Open Space Map included in the 2013 Sub-Area Plan for comparison with Figure 2-4).

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Source: Port of Bellingham, 2018.

Figure 2-4
2018 Sub-Area Plan Parks, Trails and Open Space

Table 2-5
PARKS, TRAILS AND OPEN SPACE – PROPOSED 2018 SUB-AREA PLAN

Redevelopment Area	Upland Park, Trail and Open Space	Public Beach Area
Marine Trades Area	9 acres	1 acre
Downtown Waterfront Area	5 acres	0.5 acre
Log Pond Area	5 acres	2 acres
Shipping Terminal Area	0 acres	0 acres
Cornwall Beach Area	14 acres	3 acres
Total	33 acres	6.5 acres

Source: Port of Bellingham, 2018.

Compared to the 2013 Sub-Area Plan, the general location and distribution of parks, trails and open space areas are slightly modified under the proposed *2018 Sub-Area Plan*. While the 2013 Sub-Area Plan included the large Commercial Street Green park area aligned with the angled street grid in the Downtown Waterfront Area, the proposed *2018 Sub-Area Plan* creates a large linear park area linking the Granary Building to Laurel Street and extending through the Log Pond Area to the Cornwall Beach Area.

Roadway Improvements

The overall Waterfront District system of vehicular, transit, bicycle and pedestrian connections to the surrounding neighborhoods under the proposed *2018 Sub-Area Plan* will be similar to the system of connections under the 2013 Sub-Area Plan. However, the proposed *2018 Sub-Area Plan* reflects a straight street grid in the Downtown Waterfront Area and portions of the Log Pond Area (reflective of the Downtown Bellingham street grid), compared to the angled street grid under the 2013 Sub-Area Plan.

Primary functions of the street network under the proposed *2018 Sub-Area Plan* include:

- *Connectivity* – Waterfront streets will establish new connections between the waterfront and adjacent neighborhoods by extending the existing street grid, establishing new view corridors, and developing new vehicle and pedestrian access points over the bluff and an active railroad. The proposed *2018 Sub-Area Plan* includes a pedestrian plaza with a stairway at the extension of Bay Street to provide a direct pedestrian connection between the City Center and the Waterfront District. This connection also includes a parking garage entrance at Bay Street to allow vehicles to access the site from the top of the bluff, and park in a new parking garage located along the bluff, reducing vehicle traffic on Waterfront District streets.
- *Local traffic* – Streets within the waterfront will be designed to serve mostly local traffic and include a number of traffic calming features, such as narrow lanes, paving

and sidewalk textures and landscaping to ensure that vehicles move at slow speeds, in keeping with the character of the area.

- *Pedestrian environment* – A variety of pedestrian features will create a walkable environment, with design adjustments to accommodate a comfortable blend of opportunities for people moving on foot, and using bikes, transit, commercial and personal vehicles, including pedestrian connections to the City Center.
- *Phased implementation* – The street network will be constructed gradually over time in planned phases. A biennial monitoring program will provide information on frequency of use and available capacity for each section of the network to assist the City and Port in programming needed infrastructure improvements and maintaining concurrency with adopted levels of service.

The parking strategy under the proposed *2018 Sub-Area Plan* is intended to promote a pedestrian-friendly waterfront environment and encourage transit ridership, while providing sufficient parking to accommodate public access, support future businesses and attract private developer investment. Reduced surface parking is a key strategy in creating pedestrian-oriented development. Reduced surface parking will also decrease the total amount of impervious surfaces in the Waterfront District and lessen the impacts of stormwater runoff. Parking policies and design standards support reduced minimum parking space requirements, shared parking, commute trip reduction, and require off-street parking in commercial mixed-use areas to be located behind, beside or under buildings, or within parking structures. These provisions are intended to accommodate the projected density without creating a waterfront dominated by surface parking.

Parking will be accommodated through a balanced mix of on-street, surface, integrated structured parking and freestanding garages to support the future development capacity. Initially, on-street parking and low-cost interim surface parking lots will provide much of the parking capacity. As density increases, the interim surface parking will transition to structured parking integrated into the development. The long-term strategy to redevelop surface parking lots as infill sites allows maximum flexibility to encourage initial development without sacrificing the long-term vision of the Waterfront District as a dense urban environment with limited, but sufficient off-street surface parking. Permitting for development will include clear time lines for closure of interim surface lots and provisions for alternate parking facilities upon loss of interim surface parking.

The Waterfront District is split in two sections by the Whatcom Waterway. Properties north of the Whatcom Waterway are accessed by C Street, F Street and Hilton Avenue, which connect to Roeder Avenue. These streets have historically provided automobile and truck access to businesses on the site. In the future, F Street will be upgraded to be the primary access to the Marine Trades area and businesses, and will include sidewalks and dedicated bicycle lanes. Hilton Avenue and C Street will become local streets designed to accommodate truck traffic, forklifts, large and heavy freight and boats on travel lifts.

Properties south of the Whatcom Waterway are accessed primarily via Cornwall Avenue. Central Avenue historically provided access to the site via Roeder Avenue. This site entrance has been closed to vehicle traffic, other than service vehicles and bicycles. Granary Avenue and Laurel Street are currently under construction as arterial streets with wide sidewalks and a cycle-track to form the transportation backbone through the

Downtown Waterfront area. A traffic signal will be constructed at the intersection of Granary Avenue and Roeder Avenue. An additional traffic signal and major railroad crossing improvements will be required at the intersection of Central/Roeder and the BNSF railroad tracks. Wharf Street provides limited access to the south end of the site. A network of private streets which historically provided access to the paper mill is currently closed to the public. These streets will be replaced by a network of new streets as the Waterfront District redevelops (See **Figures 2-5** through **2-9**). See Appendix C for the Roadway Network Phasing maps included in the 2013 Sub-Area Plan for comparison with Figures 2-5 through 2-9.

Because the level of density and mix of uses under the proposed *2018 Sub-Area Plan* is similar to that under the 2013 Sub-Area Plan, the level of service (LOS) at area intersections under the proposed *2018 Sub-Area Plan* is anticipated to be similar to or better than previously identified in the 2012 EIS Addendum for development under the 2013 Sub-Area Plan.

Historic Buildings and Structures

A range of scenarios regarding the relationship of historic buildings/structures to the proposed redevelopment has been analyzed in the EIS documents prepared to date. The 2008 Draft EIS identified 13 buildings/structures on the site that could potentially be eligible for listing on local, state or national historic registers. To provide a reasonable upper level determination of potential historic impacts, the 2008 Draft EIS assumed that 12 of the 13 potentially eligible buildings would be demolished (the Shipping Terminal was the only eligible structure assumed to be retained) and the removal of these structures was identified as an environmental impact. As part of the EIS process, further analysis was conducted in the previous EIS Documents regarding the potential retention/reuse of certain potentially eligible buildings/structures.

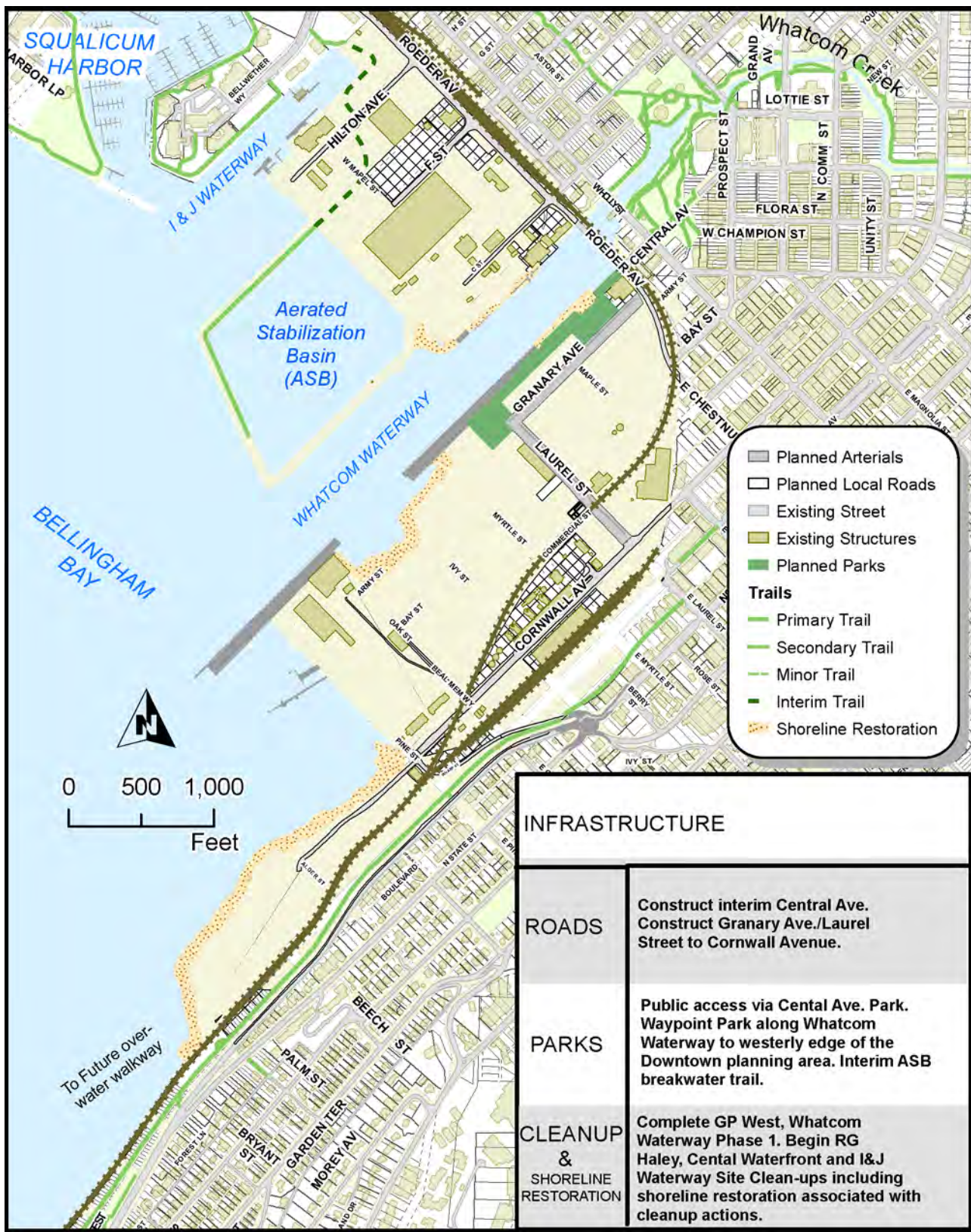
The 2010 Preferred Alternative described in the 2010 Final EIS identified a total of six buildings that would be temporarily held from demolition. Three structures/portions of structures would be retained for possible adaptive reuse based on the phasing of site cleanup and redevelopment activities, changes in market and economic conditions and the financial considerations of the owner. These structures were the Old Granary Building, the Board Mill Building and the east portion of the Alcohol Plant. Three iconic structures were also identified to be temporarily held from demolition for possible retention/reuse; they were the Chip Bins, the Digester Tanks, and the High Density Tanks.

The 2012 EIS Addendum assumed that the six structures would continue to be retained for possible adaptive reuse on the site.

Subsequent to issuance of the 2012 EIS Addendum and adoption of the 2013 Sub-Area Plan, the Digester and Chipper buildings¹, and the associated Chip Bins, were removed in 2015. As an element of the building demolition, several digester tanks, the Chipper and the Acid Ball industrial features associated with the Digester and Chipper Buildings were retained for possible adaptive reuse. In early 2018, the acid ball was relocated to the Waypoint Park site on the Whatcom Waterway.

¹ The Digester Building and Chipper Building were identified in the 2008 Supplemental EIS as buildings assumed to be demolished under development of the Waterfront District Redevelopment Project.

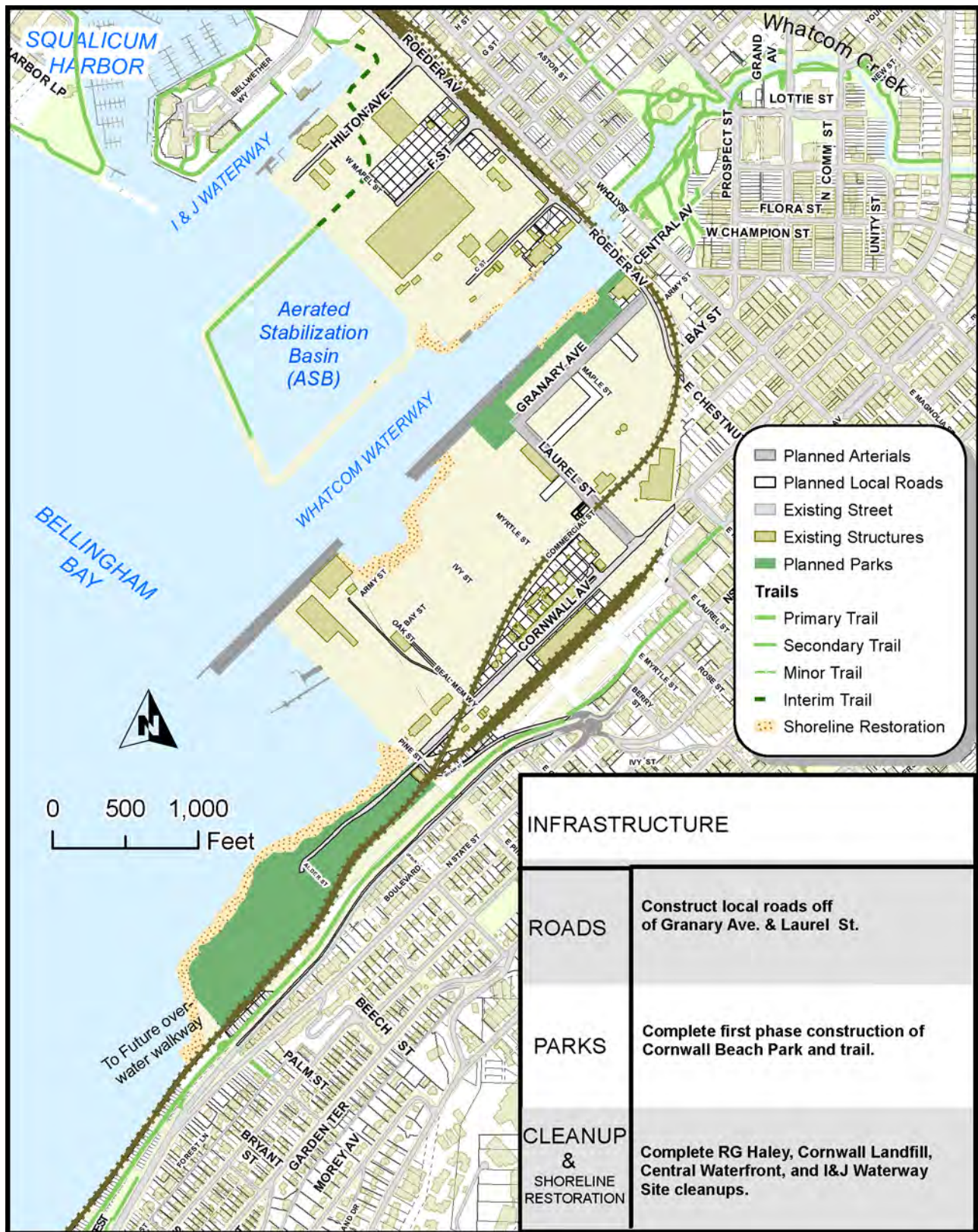
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Source: Port of Bellingham, 2018.

Figure 2-5
2018 Sub-Area Plan— Proposed Roadways: Phase 1

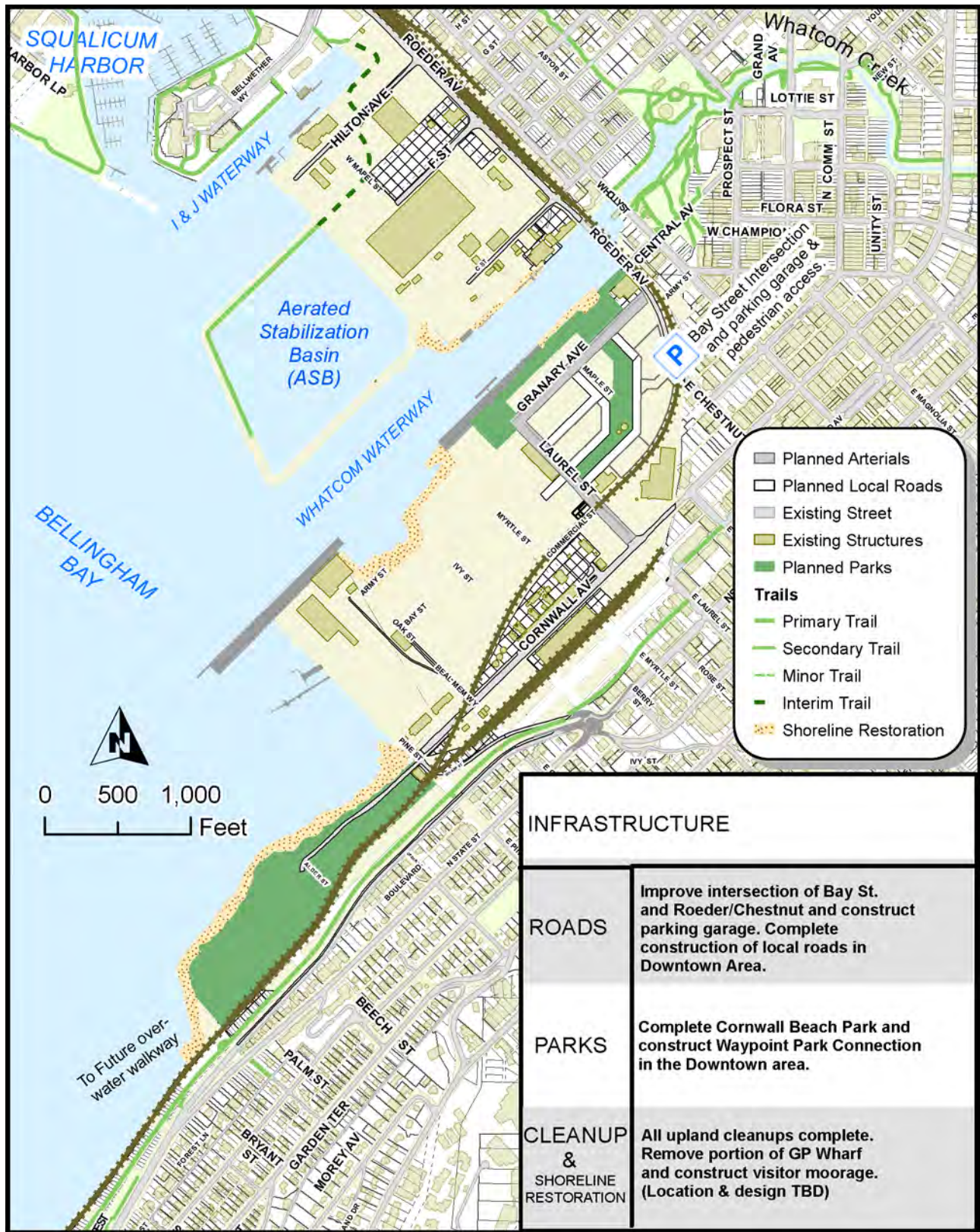
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Source: Port of Bellingham, 2018.

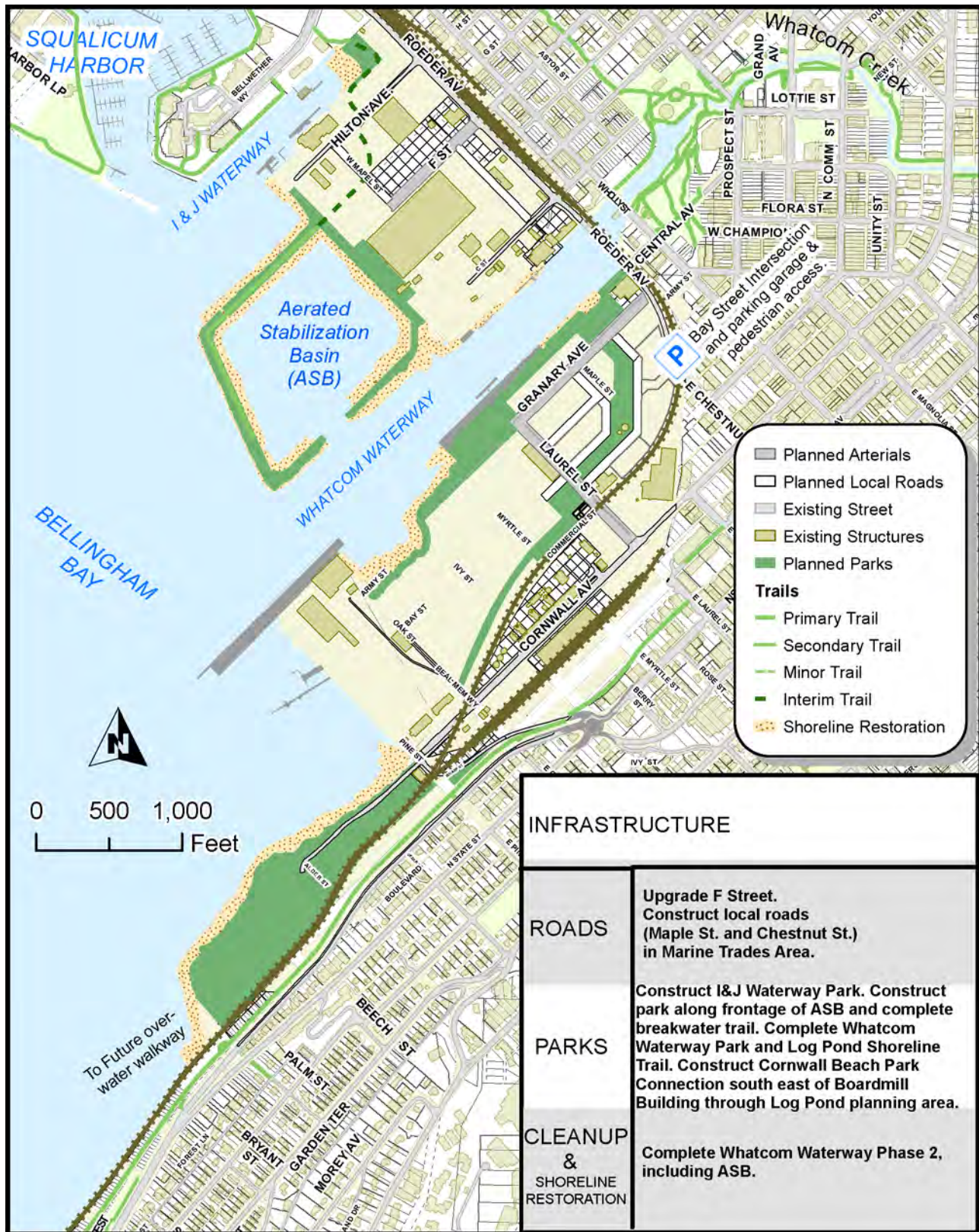
Figure 2-6
2018 Sub-Area Plan— Proposed Roadways: Phase 2

Waterfront District 2018 Sub-Area Plan Project EIS Addendum



Source: Port of Bellingham, 2018.

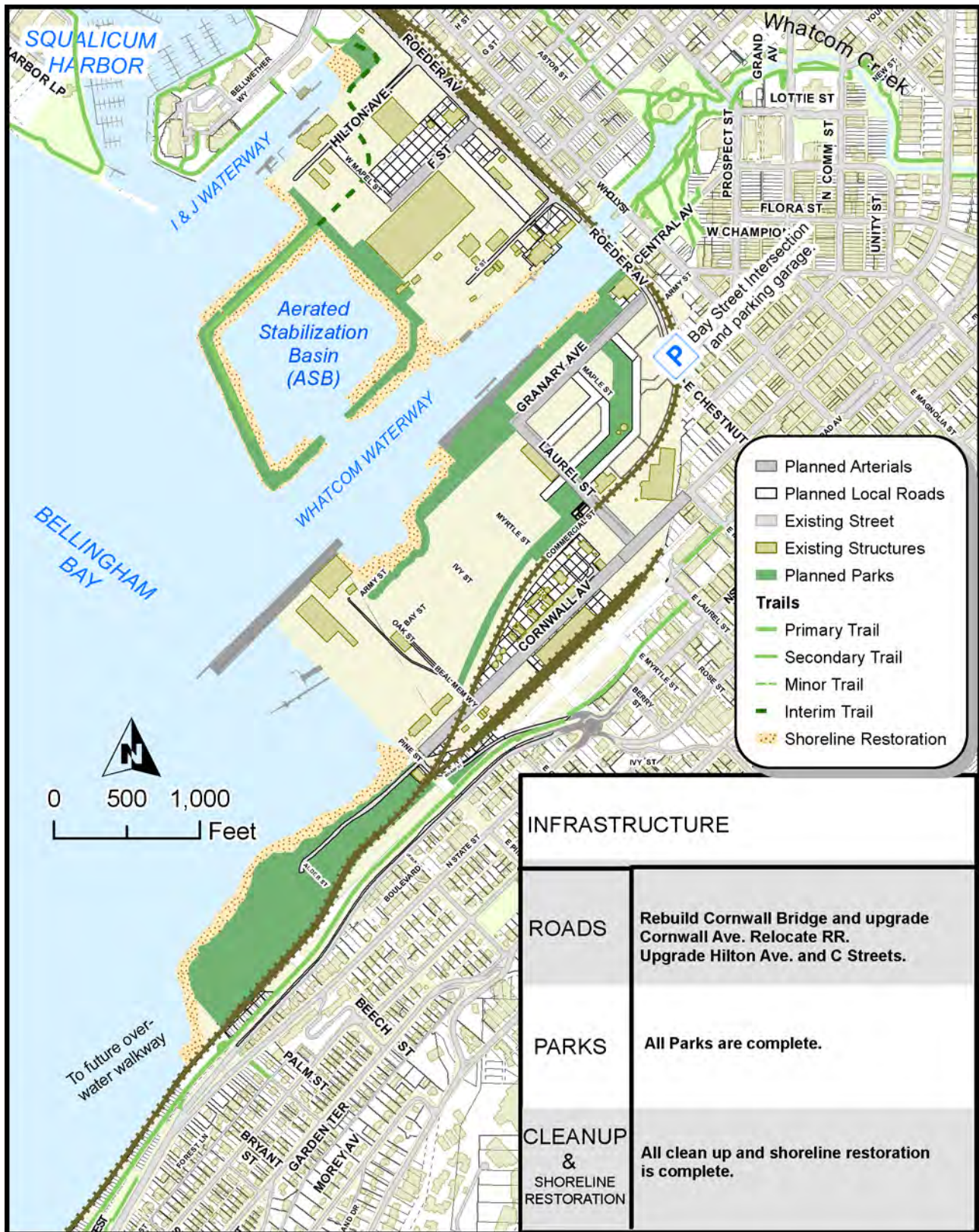
Waterfront District 2018 Sub-Area Plan Project EIS Addendum



Source: Port of Bellingham, 2018.

Figure 2-8
2018 Sub-Area Plan—Proposed Roadways: Phase 4

Waterfront District 2018 Sub-Area Plan Project EIS Addendum



Source: Port of Bellingham, 2018.

Consideration of existing structures under the proposed *2018 Sub-Area Plan* builds upon the previous EIS documentation and, as under the 2012 EIS Addendum and 2013 Sub-Area Plan, identifies three structures to be retained for possible adaptive reuse, including:

- Old Granary Building²
- Board Mill Building
- Alcohol Plant – East Portion

In addition, as identified in the 2012 EIS Addendum, the following iconic structures would be retained for possible adaptive reuse, based on further iconic evaluation and financial considerations of the owner at the time of redevelopment.

- Chipper
- Digester Tanks
- High Density Tanks
- Acid Ball³

See **Figure 2-10** for an illustration of the structures which may be retained and reused on the Waterfront District site (see Appendix C for the Structures to be Retained Map included in the 2013 Sub-Area Plan for comparison with Figure 2-10).

Q3. *What environmental review documents have previously been issued for the Waterfront District Redevelopment Project to date?*

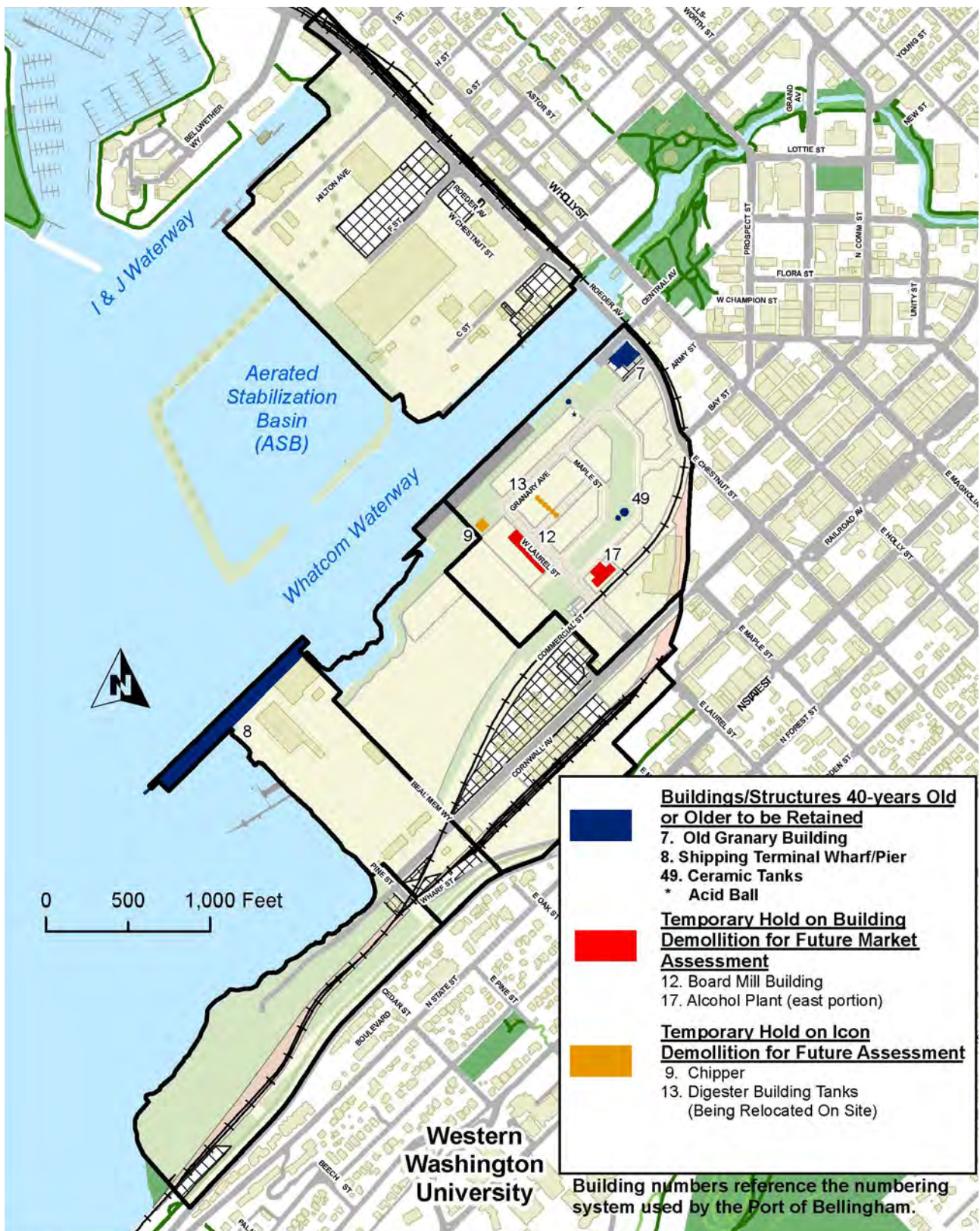
- A3.** To date, five environmental review documents under the State Environmental Policy Act (SEPA) have been issued for public review and comment by the Port of Bellingham in support of the Waterfront District Redevelopment Project, including the previous EIS documents.

2008 Draft EIS – A Draft EIS (2008 DEIS) for the Waterfront District Redevelopment Project was issued by the Port of Bellingham in January 2008. The 2008 DEIS addresses the probable significant adverse impacts that could occur as a result of the approval by the Port of Bellingham of amendments to the Comprehensive Scheme of Harbor Improvements, adoption by the City of Bellingham of the Master Development Plan and implementing regulations, the approval of a Development Agreement between the Port and the City, and potential future redevelopment activities on the Waterfront District (formerly known as New Whatcom) site during a 20-year buildout horizon (20-year horizon was assumed for environmental review purposes).

² The Granary Building is undergoing adaptive reuse renovation and will contain new retail, restaurant and office uses. The Granary Building will be permanently retained on the Waterfront District site.

³ The Acid Ball has been relocated to the Waypoint Park site and will be retained as a feature of the park.

Waterfront District 2018 Sub-Area Plan Project EIS Addendum



Source: Port of Bellingham, 2018.

Figure 2-10

At the time the 2008 DEIS was prepared and issued, a preferred Master Development Plan (MDP) for the site had not been determined. Accordingly, a range of alternatives were addressed in the 2008 DEIS that represented an overall envelope of potential redevelopment that the site could accommodate (Alternatives 1 through 4 in the 2008 DEIS). The 2008 DEIS recognized that features of the alternatives could be mixed and matched to arrive at the final Master Plan Development for the site.

The Alternatives analyzed in the 2008 DEIS included: Alternative 1 (Higher Density Alternative) assuming approximately 7.5 million square feet of total floor space for mixed-use redevelopment; Alternative 2 (Medium Density Alternative) assuming approximately 6.0 million square feet of total mixed-use redevelopment; Alternative 3 (Lower Density Alternative) assuming approximately 4.0 million square feet of total mixed-use redevelopment; and, Alternative 4 (No Action Alternative) assuming continued industrial use under the existing zoning. The 2008 DEIS alternatives also considered a range of roadway and railroad configurations. All four 2008 DEIS alternatives assumed the development of a marina in the aerated stabilization basin (ASB), located in Bellingham Bay in the western portion of the site.

2008 Supplemental Draft EIS – In October 2008, the Port issued a Supplemental Draft EIS (2008 SDEIS) which analyzed project refinements made subsequent to the issuance of the Draft EIS. Port staff, with input from the City, the public, and agencies, prepared a recommended Proposal that served as an updated redevelopment concept for the site; this concept is referred to as the “Preferred Alternative” in the 2008 SDEIS (refer to Chapter 2 of the 2008 SDEIS for a detailed description of the Preferred Alternative). The 2008 Preferred Alternative represented a refinement of the 2008 DEIS Alternatives 1 through 3 in terms of redevelopment density and mix of uses, road system, grading and stormwater management, parks and shoreline habitat, in-water work, historic buildings, view corridors, and development regulations. The Preferred Alternative in the 2008 SDEIS featured approximately 6.0 million square feet of mixed-use redevelopment, similar to 2008 DEIS Alternative 2. However, the 2008 Preferred Alternative differed from the 2008 DEIS Alternatives in that it was based on a modified, rotated street grid that was intended to provide for connections to downtown Bellingham, opportunities for formal view corridors and effective engineering solutions for bridging the bluff and the BNSF railroad corridor. The 2008 Preferred Alternative was the subject of the SDEIS issued in October 2008.

The 2008 SDEIS also addressed a “Straight Street Grid Option” as defined by the City. The key differences between the Straight Street Grid Option and the 2008 Preferred Alternative included: the orientation of the street grid and its connections to adjacent areas; the assumed building heights; the assumed retention of certain historic buildings; and, the assumption of view corridors along road rights-of-ways.

2010 EIS Addendum – In February 2010, the Port issued an EIS Addendum which described project refinements made subsequent to issuance of the 2008 SDEIS. Based on coordination between the City and the Port, the Port prepared a recommended 2010 Preferred Alternative for analysis in the 2010 EIS Addendum. The 2010 Preferred Alternative represented a refinement of the 2008 Preferred Alternative in terms of street network, view corridors, historic buildings/structures, and continued operation of the Puget Sound Energy Encogen Plant.

2010 Final EIS – In July 2010, the Port issued the Final EIS which described the 2010 Preferred Alternative (same 2010 Preferred Alternative described in the 2010 EIS Addendum), provided discussions on key topic areas (Historic Resources, Transportation/Parking, Views, Environmental Health, Stormwater, and Parks and Shorelines) and provided response to comments received on the 2008 DEIS, the 2008 SDEIS, and the 2010 EIS Addendum.

2012 EIS Addendum – The 2012 EIS Addendum reflected updates to the 2010 Preferred Alternative described and analyzed in the 2010 Final EIS. The primary updates identified and analyzed in the EIS Addendum related to an increase in the overall site area, proposed land uses and phasing, building heights and view corridors, parks and open space, roadway improvements, historic buildings and structures, and overwater coverage. The Preferred Alternative described and analyzed in the 2010 EIS Addendum formed the basis of the Master Development Plan, Development Regulations, and 2013 Sub-Area Plan.

Q4. *What elements of the environment were evaluated in the 2008 Draft EIS, 2008 Supplemental Draft EIS, 2010 EIS Addendum and 2012 EIS Addendum?*

A4. The *New Whatcom Redevelopment Project* 2008 DEIS, 2008 SDEIS, 2010 EIS Addendum and 2012 EIS Addendum contain environmental analyses of the elements of the environment listed below; based on the public scoping process conducted in March/April 2007. Elements of the environment analyzed in the 2012 EIS Addendum are indicated with an *.

- Earth*
- Air Quality*
- Water Resources
- Plants and Animals
- Environmental Health
- Noise*
- Historic and Cultural Resources*
- Land Use
- Relationship to Plans & Policies
- Aesthetics
- Population, Employment & Housing
- Transportation*
- Public Services*
- Utilities

Q5. *What are the Proposed Actions analyzed in this 2018 EIS Addendum?*

A5. The Port of Bellingham (Port) and the City of Bellingham (City) identified the following Proposed Actions for the site that are necessary to implement the Waterfront District redevelopment vision:

1. Adopt the 2018 Waterfront District Sub-Area Plan Amendment as an amendment to the City of Bellingham Comprehensive Plan and the Port of Bellingham Comprehensive Scheme of Harbor Improvements.

2. Amend the Waterfront District Planned Action Ordinance with an updated table of required mitigation measures, consistent with those identified in the Final Environmental Impact Statement and 2018 Addendum to the EIS, to assist potential developers and agency regulators in the processing of permit applications for projects within the Waterfront District.
3. Continue to implement the established process which requires mitigation measures identified in the Final Environmental Impact Statement for anticipated impacts associated with specific types of actions to be implemented either before or concurrent with the specific action.
4. Continue the established partnership structure, with representatives from both the Port of Bellingham and City of Bellingham, working together for long-term cooperation in the phased installation of public infrastructure and mitigation implementation.
5. Update the Development Agreement and associated Development Regulations to establish clear, predictable standards and review procedures for development.
6. Amend the Facilities Agreement to clarify the roles and responsibilities of the City and Port to implement the Waterfront District Sub-Area Plan.
7. Prepare more detailed park and infrastructure plans, with additional opportunities for public input, as specific parks and public spaces are designed and funded.
8. Periodically review the Waterfront District Sub-Area Plan and prepare amendments to the plan and development regulations to respond to development trends or changes in technology.

Q6. *What is an EIS Addendum and why is it being prepared?*

- A6.** Pursuant to WAC 197-11-600 and 197-11-706, an Addendum is an environmental document used to provide additional information or analysis that does not substantially change the analysis of significant impacts and alternatives in an existing environmental document. Preparation of an Addendum is appropriate when a proposal has been modified and the changes are not expected to result in any new significant adverse impacts. An Addendum may be used at any time in the SEPA process. The Washington State Environmental Policy Act (SEPA) Rules (WAC 197-11-625) identify the procedures that shall be followed during the preparation of an EIS Addendum, including the following:
- An Addendum shall clearly identify the proposal for which it is written and the environmental document it adds to or modifies.
 - An agency is not required to prepare a draft Addendum.

- An Addendum for a DEIS shall be circulated to recipients of the initial DEIS under WAC 197-11-455.
- If an Addendum to a Final EIS is prepared prior to any agency decision on a proposal, the addendum shall be circulated to the recipients of the Final EIS.
- Agencies are encouraged to circulate an Addendum to interested persons. Unless otherwise provided in these rules, however, agencies are not required to circulate an addendum.

An EIS Addendum is being prepared because the proposed *2018 Sub-Area Plan* Amendment modifications result in a level of development similar to or less than that under alternatives analyzed in the previous SEPA environmental review documentation. These modifications are not anticipated to result in any new significant unavoidable adverse impacts.

Q7. What will occur after the issuance of the EIS Addendum?

- A7.** The previous EIS documents and this 2018 EIS Addendum will be used as tools by the City (along with other considerations and public input) to make a decision regarding the proposed 2018 Subarea Plan.

Subsequent to approval of the proposed *2018 Sub-Area Plan*, permit applications for infrastructure improvements, construction projects and building redevelopment activities within the site will be submitted to the City and/or other agencies over the long-term buildout period. The City will determine whether each project is consistent with the approved Master Development Plan and other applicable regulations, as well as the Planned Action Ordinance, and will assess whether the environmental impacts and mitigation for these projects have been adequately addressed in the EIS. If so, further environmental analysis will not be required under SEPA and the City will make decisions on permits according to the appropriate process. For projects that require other state and federal permits, the appropriate agencies will review such projects and make decisions on the permits according to their applicable processes. These agencies will also determine if the EIS documents adequately covered the impacts/mitigation related to the specific projects. When approvals have been obtained from the City and agencies, multiple/phased construction and redevelopment projects would be implemented on the site.

Comparison of Environmental Impacts

3.1 LAND USE/RELATIONSHIP TO PLANS AND POLICIES

This section of the 2018 EIS Addendum provides a discussion of existing land use conditions, compares the probable significant impacts under the proposed *2018 Sub-Area Plan* on land use conditions to those analyzed under the previous EIS documents, and identifies any new mitigation measures. The proposed *2018 Sub-Area Plan*'s relationship to existing plans and policies is also discussed in this section.

3.1.1 Affected Environment

The 2008 DEIS described the historic and existing land use conditions on the Waterfront District site. The general character of the Waterfront District reflects the industrial maritime uses that have been present on the site for the past approximately 100 years. This industrial character relates to a range of land use activities, including manufacturing, shipping, storage, and transportation. The specific character of the site varies by area, with the highest level of land use associated with industrial uses in the Marine Trades Area, former Georgia Pacific uses in the Downtown Waterfront Area¹, former Georgia Pacific uses and the PSE Encogen Plant in the Log Pond Area, and the Bellingham Shipping Terminal in the Shipping Terminal Area.

The general pattern of land use surrounding the Waterfront District site is also varied and consists of commercial, residential, industrial, marine, and institutional uses. Commercial and mixed-uses associated with Downtown Bellingham are located to the southeast of the site. Industrial and commercial uses are located to the north and east of the Waterfront District, with residential uses located further to the east. Land uses to the south of the site are topographically separated by bluff and generally consist of residential uses and low-level commercial uses; the Western Washington University campus is located further to the south.

3.1.2 Impacts

Prior EIS Documents

Potential impacts to land use conditions were analyzed in the EIS as part of the 2008 Draft EIS, 2008 Supplemental Draft EIS, and 2012 EIS Addendum.

2008 Draft EIS

The 2008 Draft EIS analyzed a range of redevelopment alternatives, including mixed-use redevelopment ranging from 4 million to 7.4 million square feet (2008 Draft EIS Alternative 1-3) and industrial development of approximately 2.2 million square feet (2008 Draft EIS No Action Alternative). Temporary impacts to adjacent land uses could occur during the phased construction in the Waterfront District, including impacts from dust/emissions, increased noise levels and vibration, and increased traffic. Construction activities would adhere to all

¹ Several of the former Georgia Pacific Structures have been removed subsequent to issuance of the 2012 EIS Addendum, including the 2015 removal of the Digester Building and the Chipper Building.

applicable regulations (including noise and air quality) and associated impacts were not anticipated to be significant.

Operation of the assumed redevelopment in the 2008 DEIS would convert the Waterfront District site from its current vacant and underutilized industrial condition to a new urban mixed-use neighborhood. Building density and building heights would increase on the site with maximum building heights ranging from 100 to 200 feet. Land uses on the site would include a mix of office, institutional, industrial, marina, recreation, residential, retail and restaurant. Redevelopment would also include 15 to 33 acres of parks, trails and habitat, as well as a new marina. New parks and trails would allow increased public access to the waterfront area. The overall level of mixed-use development is generally consistent with the existing uses in the vicinity of the site and no significant land use impacts were anticipated.

Activity levels on the site were anticipated to increase from existing levels as a result of new employment and housing on the site. Increased activity levels on the site could result in increased levels of traffic, noise and air pollution; however, given the compatibility of new uses with existing adjacent uses, as well as existing topographic and land use buffers, no significant impacts were anticipated.

New development under the 2008 Draft EIS Preferred Alternative could be located in proximity to existing and ongoing industrial and transportation uses on the site (Bellingham Shipping Terminal, industrial uses in the Marine Trades Area, and BNSF railroad) and could experience impacts related to noise, emissions and vibration; however, with the implementation of identified mitigation measures these impacts are not anticipated to be significant.

2008 Supplemental Draft EIS

The 2008 Supplemental Draft EIS analyzed potential land use impacts from redevelopment of the Waterfront District under the Preferred Alternative and under a Straight Street Grid Option. The level of redevelopment under the 2008 Draft Supplemental Draft EIS Preferred Alternative (approximately 6 million square feet) and proposed building heights would be within the range that was analyzed in the 2008 Draft EIS. Approximately 33 acres of parks, trails and habitat would be provided, which would create increased public access opportunities to the waterfront. The proposed street network would also be developed to provide increased opportunities for vehicle, pedestrian and bicycle connections between the site and surrounding areas. No significant land use-related impacts were anticipated under the Preferred Alternative.

Under the Straight Street Grid Option, it was assumed that the mix of land uses, density and parks, trails and habitat areas on the New Whatcom site would be similar to those assumed under the Preferred Alternative (6 million square feet of building area and 33 acres of parks, trails and habitat area). The roadway network and configuration, and view corridors under the Straight Street Grid Option represented the primary difference from the Preferred Alternative; the street system in the Downtown Waterfront Area followed the existing alignment in the surrounding city of Bellingham street grid. The Straight Street Grid Option allowed for increased connection opportunities to downtown Bellingham and the surrounding neighborhoods compared to the existing condition, and the view corridors preserved views to and from designated viewpoints in Downtown Bellingham.

In terms of potential land use impacts, the assumed mix, density of amenities of the Straight Street Grid Option did not change the overall conclusions reached in the 2008 Draft EIS or those related to the Preferred Alternative in the 2008 Draft EIS or the 2008 Draft Supplemental EIS. Significant adverse land use impacts were not anticipated.

2012 EIS Addendum

Land use impacts related to construction and operations under the 2013 Sub-Area Plan as analyzed under the 2012 Updated Preferred Alternative were similar to or less than those identified in the previous SEPA EIS analyses. In general, the level of redevelopment under the 2012 Updated Preferred Alternative (and 2013 Sub-Area Plan) was less than the level analyzed in the 2008 Draft EIS, 2008 Supplemental Draft EIS (5.3 million sq.ft compared to 7.4 to 6 million sq.ft. analyzed in the 2008 documents). The increase in industrial uses on the site (particularly in the Log Pond Area) under the 2012 EIS Addendum could result in potential impacts to proposed adjacent uses on the site (i.e. office, residential and institutional uses); however, with the implementation of the mitigation measures identified in the previous EIS analyses, no significant land use-related impacts were anticipated.

2018 EIS Addendum

Construction

Construction-related land use impacts under the proposed *2018 Sub-Area Plan* are similar to that anticipated in the 2012 EIS Addendum and less than that analyzed in the 2008 Draft EIS and 2008 Supplemental Draft EIS due to the proposed amount of building development on the site (5.3 million square feet versus 7.4 to 6 million square feet analyzed in the 2008 Draft and Supplemental Draft EIS documents). Potential construction-related impacts would include impacts from dust/emissions, increased noise levels and vibration, and increased traffic. As described in the 2008 Draft EIS, these impacts are temporary in nature and significant impacts are not anticipated.

Operation

Similar to that discussed in the 2012 EIS Addendum, redevelopment of the Waterfront District under the proposed *2018 Sub-Area Plan* is intended to be a medium density, sustainable development that features a diverse mix of land uses that are complimentary to Downtown Bellingham and the surrounding neighborhoods. As described previously, the proposed *2018 Sub-Area Plan* would include the same level of development density (5.3 million square feet) and in general, potential land use impacts is similar to that described in the 2012 EIS Addendum. **Table 3.1-1** provides a comparison of redevelopment under the proposed *2018 Sub-Area Plan*, 2013 Sub-Area Plan (as analyzed in the 2012 EIS Addendum), and the 2010 Final EIS Preferred Alternative.

Table 3.1-1
REDEVELOPMENT BUILDING AREA CONDITIONS – 2010 FINAL EIS PREFERRED
ALTERNATIVE, 2013 SUB-AREA PLAN, PROPOSED 2018 SUB-AREA PLAN

Land Use Category	2010 Draft Master Plan / FEIS Preferred Alternative (Building Sq. Ft./units at build-out)	2013 Sub-Area plan/2012 EIS Addendum (Building Sq. Ft./ units at build-out)	Proposed 2018 Sub-Area Plan/2018 EIS Addendum (Building Sq. Ft./ units at build-out)
Office	2,905,000 Sq. Ft.	1,420,000 Sq. Ft.	1,510,000 Sq. Ft.
Industrial	450,000 Sq. Ft.	1,530,000 Sq. Ft.	1,530,000 Sq. Ft.
Jobs Subtotal (Industrial + Office)	3,355,000 Sq. Ft.	2,950,000 Sq. Ft.	3,040,000
Residential	2,270,000 Sq. Ft. (1,891 housing units)	1,975,000 Sq. Ft. (1,646 housing units)	1,975,000 Sq. Ft. (1,646 housing units)
Retail	375,000 Sq. Ft.	375,000 Sq. Ft.	285,000 Sq. Ft.
Total	6,000,000 Sq. Ft.	5,300,000 Sq. Ft.	5,300,000 Sq. Ft.

Source: Port of Bellingham, 2018.

As shown in **Table 3.1-1**, redevelopment under the proposed *2018 Sub-Area Plan* reflects a similar mix of uses and density as under the 2013 Sub-Area Plan as analyzed in the 2012 EIS Addendum. As indicated in Table 3.1-1, the mix of uses would be adjusted slightly under the proposed *2018 Sub-Area Plan*, with the amount of office use increased by 90,000 sq. ft. and the amount of retail use decreased by a corresponding 90,000 sq. ft.; total building square footage under the proposed *2018 Sub-Area Plan* would be the same as under the 2013 Sub-Area Plan and less than under the Preferred Alternative analyzed in the 2010 Final EIS. The provision of a revised road and park alignment in the Downtown Waterfront Area under the proposed *2018 Sub-Area Plan* is not anticipated to result in additional land use impacts beyond those identified in the 2012 EIS Addendum.

As described in the 2008 Draft EIS and 2012 EIS Addendum, new and existing industrial uses in the Log Pond Area under the proposed *2018 Sub-Area Plan* could be located in proximity to proposed office, institutional and residential uses and these uses could experience impacts related to noise, emissions and vibration from industrial operations. However, the 2008 Draft EIS identified potential mitigation measures that could be implemented as part of the site design, planning and building construction which would mitigate potential impacts associated with proposed industrial uses located in proximity to proposed adjacent land uses. As a result, no additional significant land use impacts are anticipated under the proposed *2018 Sub-Area Plan*.

Cumulative Impacts

As indicated in the previous EIS documents, the mix of uses under the proposed 2018 Sub-Area Plan (including retail/service uses in addition to employment and residential uses) are intended to provide a wide range of services to support site employees and residents: this

could lessen the pressure for new off-site secondary development. However, to the extent that area property owners perceive an opportunity for redevelopment based, in part, on new employees and residents associated with the Waterfront District, some new development in the area could be indirectly generated. Any development in the area generated indirectly by Waterfront District redevelopment would likely occur incrementally over time and would be assumed to be consistent with City of Bellingham land use goals and regulations; therefore, significant cumulative land use impacts are not anticipated.

3.1.3 Conclusions

Land use-related impacts under the proposed *2018 Sub-Area Plan* are similar to or less than those identified in previous Waterfront District EIS documentation². In general, the proposed level of redevelopment under the *2018 Sub-Area Plan* is similar to or less than the level analyzed in the 2008 DEIS, 2008 Supplemental Draft EIS, 2010 Final EIS and 2012 EIS Addendum. The proposed adjustments in the street grid and total amount of office and retail uses on the site would not be anticipated to result in the potential for additional land use impacts. With the implementation of the mitigation measures identified in the EIS, no significant land use-related impacts are anticipated.

3.1.4 Mitigation Measures

Mitigation measures were identified in the EIS as part of the 2008 Draft EIS, 2008 Supplemental Draft EIS and 2010 EIS Addendum, and these measures also apply to the proposed *2018 Sub-Area Plan*. Because no additional significant impacts were identified, no additional mitigation measures are warranted.

3.1.5 Significant Unavoidable Adverse Impacts

With the implementation of mitigation measures identified in the 2008 Draft EIS, 2008 Supplemental Draft EIS and 2010 EIS Addendum, no significant unavoidable adverse land use-related impacts are anticipated.

3.1.6 Relationship to Plans and Policies

The 2008 DEIS, 2008 SDEIS, 2010 EIS Addendum and 2012 EIS Addendum evaluated the consistency of the proposed Waterfront District redevelopment with several relevant plans, policies and regulations, including state, county and local documents. Key plans that were evaluated in those documents included the following:

- Washington State Growth Management Act (GMA)
- Washington State Shoreline Management Act (SMA)
- Whatcom County County-wide Planning Policies
- Port of Bellingham Comprehensive Scheme of Harbor Improvements for Squalicum Harbor

² Including 2008 Draft EIS, 2010 Supplemental Draft EIS, 2010 Final EIS and 2012 EIS Addendum.

- Waterfront Futures Group Vision
- Port and City Interlocal Agreements
- Waterfront Advisory Group Strategic Guidelines
- Port and City Draft Framework Plan
- City of Bellingham Comprehensive Plan
- City of Bellingham Shoreline Master Program (SMP)
- City of Bellingham Land Use Code
- City of Bellingham Critical Areas Ordinance
- Bellingham Bay Demonstration Pilot.

Similar to that described in the 2008 DEIS, 2008 SDEIS, and the 2010 and 2012 EIS Addendums, the proposed *2018 Sub-Area Plan* is generally consistent with applicable local and state policies and regulations. Redevelopment under the proposed *2018 Sub-Area Plan* is similar to that analyzed in the previous SEPA environmental review documents in that it is intended to be a medium density, sustainable development that features a diverse mix of land uses that would be complimentary to Downtown Bellingham and the surrounding neighborhoods. As such, it is anticipated that the proposed *2018 Sub-Area Plan* is consistent with applicable local and state plans, policies and regulations.

3.2 HISTORIC AND CULTURAL RESOURCES

This section of the 2018 EIS Addendum provides a discussion of existing historic and cultural resource conditions, compares the probable significant impacts associated with the proposed *2018 Sub-Area Plan* on historic and cultural resources conditions to those analyzed under the EIS, and identifies any new mitigation measures.

3.2.1 Affected Environment

As described in the 2008 Draft EIS, the general site history of the Waterfront District site and site vicinity dates back to pre-history occupation by the Lummi Nation and Nooksack Indian Tribe. Over the past 30 years, numerous cultural resource and archaeological investigations have been conducted on the Waterfront District site and in the site vicinity. While pre-historic and historic-period artifacts have been discovered in the vicinity of the site, no archaeological resources have been recorded on the Waterfront District site. However, the site is located in a potentially archaeologically-sensitive landscape that includes tideflats, beaches and bluff areas. On an overall basis, the majority of the Waterfront District is considered to have a moderate potential to contain significant archaeological materials.

The Waterfront District contains several buildings/structures that are indicative of past industrial operations on the site, in particular buildings/structures associated with prior timber industry uses as part of the Puget Sound Pulp and Timber Mill and later the Georgia Pacific (GP) Corporation. Historic investigations on the site identified twenty-two buildings/structures that were at least 40 years of age¹ at the time of the publication of the 2008 DEIS, and 13 of the 22 buildings/structures could be potentially eligible for local, state or national historic registers.

3.2.2 Impacts

Prior EIS Documents

The 2008 Draft EIS assumed that 17 of the 22 buildings/structures that were at least 40 years of age could potentially be removed as part of the redevelopment of the Waterfront District. Of those buildings that could be removed, 12 of the 17 buildings/structures were identified as potentially eligible resources and the removal of these buildings/structures represents a direct impact to potentially eligible resources. However, it was indicated that it was possible that some of these buildings could be retained for reuse/rehabilitation which would result in no direct impacts to the resource. Potential impacts to archaeological resources could also occur as part of redevelopment as below-grade construction activities could create the potential to unearth archaeological materials. To the extent that such below-grade work is required, such work could affect potential archeological materials on the site.

The 2008 Supplemental Draft EIS analyzed the Preferred Alternative for redevelopment of the Waterfront District, which was within the range of redevelopment assumed in the 2008 Draft

¹ The period of 40 years or older was used to include buildings close to reaching the 50-year threshold for eligibility as a National Register of Historic Places (NRHP) resource.

EIS. Therefore, in general, it was anticipated that potential impacts to historic and cultural resources would be similar to those analyzed in the 2008 Draft EIS. However, while the overall historic and cultural resource impacts were similar, the Preferred Alternative identified five potentially eligible buildings/structures which could have a potential for reuse/retention in some capacity, thereby reducing or avoiding potential impacts to these buildings. The five buildings/structures identified in the 2008 SDEIS for potential reuse/retention included the following:

- Old Granary Building
- Barking and Chipping Plant
- Ceramic Tanks
- Board Mill Building
- Digester Building

The 2008 Supplemental Draft EIS indicated that additional analysis would determine the level of reuse potential for each of these structures based on structural integrity, necessary seismic upgrades, building footprint sizes, economic considerations, view corridors, potential sea level rise impacts, and proposed street grid locations and grade.

Historic and cultural resources were also analyzed in the 2010 EIS Addendum as they related to the 2010 Preferred Alternative. Under the 2010 Preferred Alternative, further analysis was conducted regarding the potential for preservation and/or adaptive reuse. The 2010 EIS Addendum identified four structures that would be retained for possible adaptive reuse, including:

- Steam Plant
- Granary Building
- Board Mill Building
- Alcohol Plant – East Portion

In addition, the following structures were identified as potential heritage icons that would be temporarily held from demolition for possible retention/reuse in some manner in the future.

- Chip Bins
- Digester Tanks
- High Density Tanks

Subsequent to the publication of the 2010 EIS Addendum, additional information was made available regarding the Steam Plant as part of the 2010 Final EIS. Georgia Pacific had identified significant economic and contractual obligations regarding the salvage value of materials within the Steam Plant which made the financial viability of adaptive reuse even more difficult. As such, the Steam Plant was removed from consideration for possible retention/reuse and was demolished in 2011.

The 2012 EIS Addendum built upon the previous EIS documentation and identified three structures to continue to be held from demolition for further consideration of possible retention/reuse, including:

- Old Granary Building
- Board Mill Building

- Alcohol Plant – East Portion

In addition, the 2012 EIS Addendum indicated that the following iconic structures would be retained for possible adaptive reuse, based on further iconic evaluation and financial considerations of the owner at the time of redevelopment.

- Chip Bins
- Digester Tanks
- High Density Tanks

2018 EIS Addendum

Subsequent to issuance of the 2012 EIS Addendum and adoption of the 2013 Sub-Area Plan, the Digester and Chipper buildings² and the associated Chip Bins were removed in 2015. As an element of the building demolition, several digester tanks and the acid ball industrial features associated with the Digester Building were retained for potential future reuse. In early 2018, the acid ball was relocated to the Waypoint Park site on the Whatcom Waterway. The chipper motor and some associated equipment which was within the Chipper Building was also retained for further evaluation, and remain in place.

Also subsequent to issuance of the 2012 EIS Addendum, adaptive reuse renovation of the Granary Building for retail, restaurant and office use was initiated, with opening of the remodeled building anticipated in summer 2018.

Redevelopment of the Waterfront District under the proposed *2018 Sub-Area Plan* is similar to that analyzed in the 2012 EIS Addendum, and historic and cultural resource impacts associated with the proposed *2018 Sub-Area Plan* would also be similar to those identified in the 2012 EIS Addendum.

Consideration of existing structures under the proposed *2018 Sub-Area Plan* builds upon the previous EIS documentation and, as under the 2012 EIS Addendum and 2013 Sub-Area Plan, identifies two structures to be retained for possible adaptive reuse, including:

- Board Mill Building
- Alcohol Plant – East Portion

In addition, as identified in the 2012 EIS Addendum, the following iconic structures would be temporarily held from demolition for possible retention/reuse in some manner in the future, based on further iconic evaluation and financial considerations of the owner at the time of redevelopment.

- Digester Tanks
- High Density Tanks

² The Digester Building and Chipper Building were identified in the 2008 Supplemental EIS as buildings assumed to be demolished under development of the Waterfront District Redevelopment Project.

- Acid Ball³

Cumulative Impacts

The potentially-eligible historic resources on the site are associated with the site's and the City's industrial history. If such resources are fully removed, the historic character of the working waterfront would be diminished over the long-term. Adaptive reuse of existing buildings within the mix of commercial, residential, retail and marine-related uses is being utilized as a tool to retain the site's and the area's link to the past. Future development projects in the vicinity of the site would be required to follow local, state and federal requirements related to historic structures, and significant cumulative historic impacts are not anticipated.

3.2.3 Conclusions

Historic and cultural resource impacts under the proposed *2018 Sub-Area Plan* are similar to those identified in the previous EIS documentation, due to the similar nature of proposed redevelopment in the Waterfront District and the continued status of buildings/structures that are retained for possible adaptive reuse. No additional historic or cultural resource-related impacts are anticipated.

3.2.4 Mitigation Measures

Mitigation measures were identified in the EIS as part of the 2008 Draft EIS and 2008 Supplemental Draft EIS, and these measures also apply to the proposed *2018 Sub-Area Plan*. Because no additional significant impacts were identified, no additional mitigation measures are warranted.

3.2.5 Significant Unavoidable Adverse Impacts

With the implementation of mitigation measures identified in the 2008 Draft EIS and 2008 Supplemental Draft EIS, no additional significant unavoidable adverse historic or cultural resource-related impacts are anticipated.

³ The Acid Ball has been relocated to the Waypoint Park site and will be retained as a feature of the park.

3.3 AESTHETICS

This section of the 2018 EIS Addendum provides a discussion on existing aesthetic conditions, compares the probable significant impacts under the proposed *2018 Sub-Area Plan* on aesthetic conditions to those analyzed under the previous SEPA environmental review (including 2008 Draft EIS, 2008 Supplemental Draft EIS and the 2010 EIS Addendum¹), and identifies any new mitigation measures

3.3.1 Affected Environment

The 2008 Draft EIS described the existing aesthetic character of the Waterfront District site and vicinity, as well as existing views to and from the site. The general aesthetic character of the Waterfront District site is varied and reflective of large expanses of mostly paved vacant area, interspersed by areas of industrial building development. The Marine Trades Area (north of the Whatcom Waterway) contains the highest concentration of building development on the site, including warehouse and industrial buildings. Former Georgia-Pacific buildings are located in Downtown Waterfront Area² and Log Pond Area. The Bellingham Shipping Terminal is located on the Shipping Terminal Area.

The aesthetic character of areas surrounding the Waterfront District site is varied and reflective of the existing uses in those area. The visual character of the Central Business District (CBD) to the east is reflective of a downtown core with numerous mid-rise buildings (5 to 10 stories tall). The area to the north (across the I and J Waterway) reflects the visual character of mid-rise mixed-use buildings and marina uses. The visual character to the south is defined by residential and commercial buildings of varying heights and vegetated open space. Bellingham Bay defines the area to the west of the Waterfront District site.

Existing views toward the Waterfront District site are largely dependent on location, topography and the presence of existing development. Views from the north of the site are limited to buildings and shoreline features; panoramic views of the site and surrounding area are available from higher elevations further to the north and northeast. Views from the east vary depending on topography and the presence of intervening buildings. Depending on the location, the Waterfront District site comprises a portion of the view (existing buildings and Whatcom Waterway corridor) and views of Bellingham Bay and Lummi Island are also available. Views from the south also vary due to topography, existing vegetation and existing buildings. Views of the site and Bellingham Bay are available from certain locations; areas further south at higher elevation points also can have broad panoramic views of the site, Bellingham Bay and the downtown CBD area.

¹ The 2012 EIS Addendum is not discussed as a comparison document because the 2012 EIS Addendum did not include an analysis of aesthetics conditions.

² Several of the former Georgia Pacific structures have been removed subsequent to adoption of the 2013 Sub-Area Plan, including the 2015 removal of the Digester Building and the Chipper Building.

3.3.2 Impacts

Prior EIS Documents

Potential impacts to aesthetic conditions were analyzed in the EIS as part of the 2008 Draft EIS, 2008 Supplemental Draft EIS, and 2010 EIS Addendum.

2008 Draft EIS

The 2008 Draft EIS analyzed three redevelopment alternatives with a range of densities and maximum building heights. 2008 Draft EIS Alternative 1 assumed the highest level of density (7.5 million square feet) and the tallest maximum building heights (200 feet). Therefore, 2008 Draft EIS Alternative 1 represented the highest potential for aesthetic and visual impacts, while 2008 Draft EIS Alternatives 2 and 3 reflected a lower potential for impacts.

The 2008 Draft EIS indicated that redevelopment would transform the aesthetic character of the site from a vacant and underutilized industrial site to a new urban neighborhood with a mix of uses and open space that would reflect increased density and building heights on the site. Depending on the location and topography of surrounding viewpoints, redevelopment would alter views.

The 2008 Draft EIS included visual simulations from 14 different viewpoint locations surrounding the Waterfront District site. The potential for changes in views were greatest under Alternative 1 due to the amount of density and building heights assumed on the site. Close proximity viewpoints were identified as having the greatest potential for view obstruction, while areas at a higher elevation and/or greater distance from the site were identified as experiencing moderate to limited changes in views.

2008 Supplemental Draft EIS

The 2008 Supplemental Draft EIS analyzed potential aesthetic impacts of redevelopment under a Preferred Alternative and a Straight Street Grid Option. The level of redevelopment and building heights under the Preferred Alternative were similar to those analyzed in the 2008 Draft EIS (approximately 6 million square feet of development and 200-foot maximum building heights). The Straight Street Grid Option included a similar level of building density on the site (6 million square feet) but lower maximum building heights (a uniform 75-foot maximum building height). In addition, the Straight Street Grid Option followed the existing alignment of the surrounding City street grid to allow for increased connection opportunities to the downtown CBD and surrounding neighborhoods.

Two types of formal view corridors through the site were identified in the 2008 Supplemental Draft EIS, including: view corridors defined by rights-of-ways and open space; and, view corridors defined by a combination of building setbacks and rights-of-way.

To illustrate anticipated visual conditions under the 2008 Preferred Alternative and Straight Street Grid Option, the 2008 Supplemental Draft EIS included visual simulations representing

views of site redevelopment from 10 viewpoints representative of views from the surrounding area³.

Under the Preferred Alternative, the 2008 Supplemental Draft EIS indicated that redevelopment would change the aesthetic character of the site similar to the 2008 Draft EIS and could alter views of the Waterfront District from surrounding viewpoints. Under the Straight Street Grid Option, a similar change the aesthetic character of the Waterfront District site was anticipated. The street network would continue the existing City street grid configuration of Downtown Bellingham to the site. The 2008 Supplemental Draft EIS indicated that the straight street grid could reduce the opportunity for views of the water from certain locations, but rights-of-way associated with the Straight Street Grid Option would be anticipated to provide opportunities for views through the site to the water and beyond.

2010 EIS Addendum

The 2010 EIS Addendum analyzed refinements to the Preferred Alternative including a view down a segment of Cornwall Avenue that was not included in the 2008 EIS documents; the other view corridors identified in the 2008 Supplemental Draft EIS were assumed for the 2012 EIS Addendum. The 2010 EIS Addendum indicated that aesthetics impacts under the 2010 Preferred Alternative would be similar to or less than those identified in the 2008 EIS documents.

2018 EIS Addendum

Aesthetic Character

Redevelopment of the Waterfront District under the proposed *2018 Sub-Area Plan* is intended to be a medium density development that features a mix of land uses that are complimentary to Downtown Bellingham and surrounding neighborhoods. Similar to that analyzed in the previous environmental review documents, the proposed *2018 Sub-Area Plan* would change the aesthetic character of the site from a vacant and underutilized industrial site to a new urban neighborhood with a mix of uses and open space that would reflect increased density and building heights on the site. The proposed *2018 Sub-Area Plan* would include approximately 5.3 million square feet of building space and building heights up to a maximum of 200 feet, which would be similar to or lower than the density and maximum building heights that were analyzed in the 2008 Draft EIS, 2008 Supplemental Draft EIS and 2010 EIS Addendum. The provision of a straight street grid in the Downtown Waterfront Area under the proposed *2018 Sub-Area Plan* would not be anticipated to result in additional impacts to aesthetic character beyond those identified in the 2008 Draft EIS, 2008 Supplemental Draft EIS and 2010 EIS Addendum.

Views

View corridors are included as part of the proposed *2018 Sub-Area Plan*, some of which would be similar to those included in the 2013 Sub-Area Plan and those analyzed previously (including in the 2010 EIS Addendum, 2008 Supplemental Draft EIS, and 2008 Draft EIS),

³ The 2008 Supplemental Draft EIS included simulations from five locations analyzed in the 2008 Draft EIS and five new views under both the Preferred Alternative and Straight Street Grid Option.

including view corridors along F Street, Central Avenue, Commercial Street, Cornwall Avenue and Oak Street. The previous view corridors along the angled Commercial Green, Bloedel Avenue and Log Pond Drive are replaced with new view corridors along Granary Avenue, Maple Street, Bay Street and Laurel Street to better align with the proposed roadway system and development areas (see **Figure 2-3** for an illustration of view corridors under the proposed *2018 Sub-Area Plan*). To represent visual conditions under the proposed *2018 Sub-Area Plan*, visual simulations of site redevelopment as viewed from certain viewpoints were prepared, including along Bay Street looking southwest, along Commercial Street looking southwest, along Laurel Street looking northwest, and along Granary Avenue looking southwest.

Viewpoint 1 – Bay Street (Figure 3.3-1): The existing view from Viewpoint 1 includes views of the Waterfront District site Downtown Waterfront Area and existing industrial buildings and storage tanks. Views of Bellingham Bay/Lummi Island are available in the background.

Under the proposed *2018 Sub-Area Plan*, redevelopment on the Waterfront District site would be located in the mid-ground view to the north and south of Bay Street and its associated view corridor. Views to the southwest along the Bay Street view corridor would include proposed open space areas within the Downtown Waterfront Area as well as retained ceramic tanks. Distant views of Bellingham Bay and Lummi Island would also be afforded.

Viewpoint 2 – Commercial Street (Figure 3.3-2): The existing view from Viewpoint 2 includes views of the Waterfront District site Downtown Waterfront area (including existing industrial buildings), and includes background views of Bellingham Bay and Lummi Island.

Under the proposed *2018 Sub-Area Plan*, multi-story buildings would be located in the foreground and mid-ground view, along with new trees/vegetation associated with proposed open space areas. Views to the southwest along the Commercial Street view corridor would provide views of proposed open space areas, as well as background views of Bellingham Bay and Lummi Island.

Viewpoint 3 – Laurel Street (Figure 3.3-3): The existing foreground view from Viewpoint 3 includes views of existing multi-story buildings located off-site to the east and west of Laurel Street. Background views of a portion of the Waterfront District site are available, as well as distant background views of residential areas and hillsides in the Columbia neighborhood. No views of Bellingham Bay are available from this location.

Under the proposed *2018 Sub-Area Plan*, the foreground view would remain unchanged. In the mid-ground view, a portion of building redevelopment would be visible to the east of Laurel Street and would appear as a continuation of existing off-site development in the area. The Laurel Street view corridor would provide views through the Waterfront District site and allow for continued background views of the residential areas and hillsides in the Columbia neighborhood. Trees and vegetation associated with proposed open space areas would also be visible to the east and west of the view corridor.

Viewpoint 4 – Granary Avenue (Figure 3.3-4): The existing view from Viewpoint 4 includes views of the Downtown Waterfront Area, existing industrial buildings, the Granary Building and a portion of Waypoint Park. Views of Bellingham Bay/Lummi Island are available in the background.

Waterfront District 2018 Sub-Area Plan Project
EIS Addendum



Source: Port of Bellingham, 2018.

Figure 3.3-1
Viewpoint 1—Bay Street

**Waterfront District 2018 Sub-Area Plan Project
EIS Addendum**



Source: Port of Bellingham, 2018.

Figure 3.3-2
Viewpoint 2—Commercial Street

**Waterfront District 2018 Sub-Area Plan Project
EIS Addendum**



Source: Port of Bellingham, 2018.

Figure 3.3-3
Viewpoint 3—Laurel Street

Waterfront District 2018 Sub-Area Plan Project
EIS Addendum



Source: Port of Bellingham, 2018.

Figure 3.3-4
Viewpoint 4—Granary Avenue

Under the proposed 2018 Sub-Area Plan, views to the site would include the new Granary Avenue with new building development on both sides of Granary Avenue. Views to portions of the existing Granary Building and Waypoint Park would be available. Partial distant views of Bellingham Bay/Lummi Island would be afforded

On an overall basis, with the establishment of multiple view corridors throughout the Waterfront District site, the provision of a straight street grid in the Downtown Waterfront Area under the proposed *2018 Sub-Area Plan* would not be anticipated to result in additional impacts to views beyond those identified in the 2008 Draft EIS, 2008 Supplemental Draft EIS and 2010 EIS Addendum.

Cumulative Impacts

As indicated in previous EIS documents, redevelopment of the Waterfront District under the 2018 Sub-Area Plan could indirectly spur additional development in the vicinity of the site. Any development in the area generated indirectly by the Waterfront District redevelopment would likely occur incrementally over time and could result in additional aesthetic/visual changes. Any new development is assumed to occur consistent with City of Bellingham standards and regulations, and no significant cumulative aesthetic impacts are anticipated.

3.3.3 Conclusions

Aesthetic impacts under the proposed *2018 Sub-Area Plan* are anticipated to be similar to or less than those identified in previous Waterfront District EIS documentation (2008 Draft EIS, 2008 Supplemental EIS, and 2010 EIS Addendum). In general, the proposed level of redevelopment and building heights under the proposed *2018 Sub-Area Plan* is similar to or less than conditions analyzed in previous Waterfront District EIS documentation. The street grid under the proposed *2018 Sub-Area Plan* would allow for view corridors allowing views of and through the Waterfront District site and providing visual connections to Bellingham Bay and other surrounding areas; additional view impacts would not be anticipated. With the implementation of mitigation measures previously identified in the EIS, no significant aesthetic impacts would be anticipated.

3.3.4 Mitigation Measures

Mitigation measures were identified in the EIS as part of the 2008 Draft EIS and 2008 Supplemental Draft EIS, and these measures also apply to the proposed *2018 Sub-Area Plan*. Because no additional significant impacts were identified, no additional mitigation measures are warranted.

3.3.5 Significant Unavoidable Adverse Impacts

With the implementation of mitigation measures identified in the 2008 Draft EIS and 2008 Supplemental Draft EIS, no significant unavoidable adverse aesthetic impacts are anticipated.

3.4 TRANSPORTATION

This section of the 2018 EIS Addendum provides a discussion of existing transportation conditions, compares the probable significant impacts from the proposed *2018 Sub-Area Plan* on transportation conditions to those analyzed under the previous EIS, and identifies any new mitigation measures.

3.4.1 Affected Environment

The study for the transportation analysis in the 2008 DEIS was developed in conjunction with the City of Bellingham to represent the locations that would most likely be impacted by redevelopment of the Waterfront District site. The analysis focuses on the immediate area of the Waterfront District site and also includes major corridors outside the vicinity of the site that would likely serve as access to and from the site area. The off-site study area primarily includes transportation facilities within six to eight blocks of the site, as well as Interstate-5 (I-5) interchanges serving regional traffic.

Major roadways that provide access to the Waterfront District include Roeder Avenue, Chestnut Street, Cornwall Avenue and Wharf Street. Onsite roadway and intersection operations were analyzed for various access locations to the site and all roadways operated within the City's LOS E threshold and site access intersections operate at LOS E or better during the PM peak hour. There are currently no formal pedestrian or bicycle facilities on the Waterfront District site. Bellingham's first off-street cycle track is under construction along Granary Avenue and Laurel Street. Buffered bike lanes will be installed with the resurfacing of Roeder Avenue in 2018 and marked bike lanes are recommended for Cornwall Avenue between Wharf Street and Chestnut Street.

The Burlington Northern Santa Fe (BNSF) railway runs parallel to Cornwall Avenue along the southern site frontage and passes through the site west of the Ecogen facility. At-grade crossings are located at Laurel Street, Pine/Wharf Street, F Street, C Street, Cornwall Avenue, and Central Avenue. Railroad crossing improvements were made at C Street in 2016, are being constructed on Laurel Street in 2018, and are scheduled for F Street in 2019. Railroad crossing improvements are needed at Central Avenue, Cornwall Avenue, and Pine/Wharf Street.

A total of 32 offsite intersections were included in the offsite study area with the highest existing PM peak hour traffic volumes located along Lakeway Drive, King Street, Iowa Street, Roeder Avenue, Chestnut Street, and Cornwall Avenue. All offsite roadways currently operate within the City's LOS standard (LOS E) for both directions during the PM peak hour. The intersection of North State Street/James Street/Iowa Street is the only intersection that operated at LOS F.

3.4.2 Impacts

Prior EIS Documents

Potential impacts to transportation conditions were analyzed as part of the 2008 DEIS, 2008 SDEIS, 2010 EIS Addendum and 2012 EIS Addendum. The 2008 DEIS evaluated construction and operation impacts associated with redevelopment under three alternatives which included a range of improvements to the transportation network to provide added

capacity for their expected trip generation. The 2008 DEIS indicated that construction of the Waterfront District Project would increase vehicular traffic on the site and site vicinity due to additional truck traffic, transportation of equipment and materials, and construction worker traffic. Construction traffic impacts would be highest during grading operations; however, these impacts would be temporary in nature.

Redevelopment under the 2008 DEIS Alternatives and 2010 and 2012 Updated Preferred Alternatives would contribute to increased travel demands and congestion along the onsite and offsite transportation system. The greatest number of vehicle trips would occur during the PM peak hour and this increase in vehicle trips would add to transportation system delays and affects operations at certain roadways/intersections. In order to accommodate traffic from redevelopment, additional improvements (beyond those assumed for the project) would be required to mitigate potential transportation impacts, including roadway/intersection improvements. Parking demand was accommodated by approximately 2,500 to 15,560 parking stalls onsite. A new sidewalk and pedestrian/bicycle trail system would provide access through the site and connections to surrounding neighborhoods and offsite trail networks.

The 2008 SDEIS and 2010 and 2012 EIS Addendums analyzed the potential transportation-related impacts of a Preferred Alternative for the Waterfront District. The EIS documents indicated that redevelopment is within the range analyzed in the 2008 DEIS and potential construction- and operations-related transportation impacts are similar to or less than those analyzed in the 2008 DEIS. Redevelopment analyzed in the 2008 SDEIS and 2010 and 2012 EIS Addendums would result in increased new trips and impacts to onsite and offsite intersections. As described in the 2008 DEIS, certain roadways and intersections exhibit a decline in LOS and others improve due to assumed transportation improvements. Assumed onsite access improvements create the necessary capacity to support up to six million square feet of redevelopment, and additional offsite improvements would be needed to address congestion and operational deficiencies. Parking demand was accommodated by approximately 12,892 parking spaces throughout the site. An extensive pedestrian and bicycle friendly environment would accommodate the approximately 14,000 daily pedestrian/bicycle trips associated with redevelopment.

Subsequent to the issuance of the 2008 SDEIS, the proposal for the Waterfront District was updated to reflect continued discussion/coordination between the Port of Bellingham and the City of Bellingham. The 2010 and 2012 EIS Addendums were prepared to analyze the 2010 and 2012 Preferred Alternatives, including modifications to the street network analyzed in the 2008 SDEIS. Similar to the 2008 SDEIS, under the 2010 2012 Preferred Alternative, all onsite intersections would operate at LOS E or better with an adequate access point at Wharf Street. Offsite intersections would also have similar LOS operations to the 2008 SDEIS with the potential Wharf Street bridge connection; however, development without the Wharf Street bridge connection would likely increase delay at offsite intersections. Onsite parking and non-motorized facilities conditions were assumed to be similar to the 2008 SDEIS.

2018 EIS Addendum

In support of this 2018 EIS Addendum, additional transportation analysis has been completed to evaluate the changes that have taken place since the completion of the 2012 EIS Addendum and 2012 FEIS. The following analysis builds upon work completed as part of the 2008 DEIS, the 2008 SDEIS, the 2010 EIS Addendum, the 2010 FEIS, 2012 FEIS and 2012 EIS Addendum.

Proposed Roadway Network – Site Access and Circulation

Under the 2018 Updated Preferred Alternative, the proposed roadway network, site access and circulation is similar to the Straight Street Grid evaluated in the 2008 SDEIS. Proposed access to the Marine Trades Area is identical to 2013 Sub-Area Plan analyzed in the 2012 EIS Addendum.

Proposed site access for the areas south of the Whatcom Waterway will include four access points: Granary Avenue, Cornwall Avenue, Wharf Street, and a parking garage entrance at Bay Street. The arterial roads in the Downtown Waterfront will be aligned the same as the Downtown roadways. Access to the Log Pond and Shipping Terminal will be provided by Oak Street. If the BNSF railway is relocated during Phase 5, additional access between the Downtown Waterfront and the Log Pond area could be constructed along the vacated railroad right-of-way. The Commercial Street bridge is not included as part of the proposed *2018 Sub-Area Plan*.

Trip Generation

Redevelopment under the proposed *2018 Sub-Area Plan* provides approximately 5.3 million square feet of mixed-use redevelopment, consistent with the development contemplated in the 2012 EIS Addendum. Trip generation for the proposed *2018 Sub-Area Plan* was calculated for the weekday AM and PM peak hours using the same person trip methodology that was utilized throughout the EIS process for the Waterfront District. The person trip calculations are updated to reflect the most recent trip rates and average vehicle occupancies in the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 10th Edition. **Table 3.4-1** provides a summary and comparison of trip generation under the proposed *2018 Sub-Area Plan* and the 2012 Preferred Alternative (2013 Sub-Area Plan). Detailed trip generation calculations are provided in **Appendix B**.

Table 3.4-1
ESTIMATED OFFSITE VEHICLE TRIP GENERATION SUMMARY

	AM Peak Hour Vehicle Trips ¹			PM Peak Hour Vehicle Trips ¹		
Scenario	In	Out	Total	In	Out	Total
<u>2018 Sub-Area Plane</u>						
Existing Development to Remain	341	51	392	73	382	455
New Development	2,513	961	3,474	977	2,163	3,140
Total Trips Offsite	2,854	1,012	3,866	1,050	2,545	3,595
<u>2012 Preferred Alternative (2013 Sub-Area Plan)</u>						
Existing Development to Remain	341	51	392	73	382	455
New Development	2,347	890	3,238	1,254	2,624	3,878
Total Trips Offsite	2,688	941	3,630	1,327	3,006	4,333
<u>2010 Preferred Alternative & 2008 Preferred Alternative – Straight Street Grid</u>						
Existing Development to Remain	341	51	392	73	382	455
New Development	3,039	1,084	4,123	1,451	3,176	4,627

Total Trips Offsite	3,380	1,135	4,515	1,524	3,558	5,082
Difference (2018 – 2012)	+166	+71	+236	-277	-461	-738
Difference (2018 – 2010)	-526	-123	-649	-474	-1,013	-1,487

Source: Transpo Group, March 2018

1. Vehicle trips were estimated based on person trips for each land use.

As shown in **Table 3.4-1**, the proposed *2018 Sub-Area Plan* generates approximately 650 to 1,490 fewer trips offsite than the 2010 Preferred Alternative. Compared to the 2012 Preferred Alternative, the proposed *2018 Sub-Area Plan* generates approximately 740 fewer trips offsite during the weekday PM peak hour and 240 more trips offsite during the weekday AM peak hour. The traffic generated by the proposed *2018 Sub-Area Plan* is within the bounds of the trip generation evaluated for the Waterfront District Alternatives.

Operation Impacts

Based on the similarities between the proposed *2018 Sub-Area Plan* and 2008 Preferred Alternative Straight Street Grid Option, including site access and onsite circulation, it is anticipated that the transportation impacts to the onsite and offsite intersections and roadways would be similar to those analyzed in the 2008 SEIS. In addition, given the decrease in trip generation and overall redevelopment density in the Waterfront District that would result under the proposed *2018 Sub-Area Plan*, it is possible that transportation impacts could be lower than previously identified for the 2008 SEIS. A biennial monitoring system has been established to keep track of the on- and off-site mode shares including bicyclist and pedestrians as well as infrastructure needs. When WTA transit service becomes available within the Waterfront District in the future, seated capacity and ridership will be added to the biennial monitoring system.

Cumulative Impacts

Cumulative transportation impacts were evaluated as part of the previous EIS documents. The primary analysis of future conditions assumed an increase in traffic volumes as a result of forecasted increases in the number of dwelling units and employment in the study area and throughout the Bellingham area over the next 20 years. Consideration was given to specific planned projects in the study area. The background travel forecasts were estimated based on the expected number of vehicle trips during the weekday PM peak hour generated by future land uses. This information was calculated using the City of Bellingham's travel demand model. The model was used to forecast the number of vehicles trips in the study area. The cumulative transportation impacts of the Waterfront Redevelopment combined with increases in background traffic were accounted for as part of the assumed background growth for the primary analysis. Consistent with the previous EIS documents, no additional cumulative impacts would result with the proposed *2018 Sub-Area Plan*. Background growth could also result in increased non-motorized trips, parking demands in the surrounding area and transit-related trips. Significant cumulative impacts on these other transportation modes would not be anticipated.

3.4.3 Conclusion

Transportation-related impacts under the proposed *2018 Sub-Area Plan* are the same or less than those identified in the EIS for the 2008, 2010, and 2012 Preferred Alternatives. In general,

the proposed level of redevelopment under the proposed *2018 Sub-Area Plan* will generate fewer trips than the level analyzed for the 2013 Sub-Area Plan in the 2012 EIS Addendum. The proposed roadway network, access and circulation are similar to the previous Preferred Alternative Straight Street Grid Option and as such, potential transportation-related impacts are anticipated to be the same as or less than those identified for the previous Preferred Alternatives and no new significant transportation-related impacts are anticipated.

3.4.4 Mitigation Measures

Mitigation measures were identified in the previous EISs and these measures apply to the proposed *2018 Sub-Area Plan*. Because no additional significant transportation impacts were identified, no additional mitigation measures have been identified. Similar to the 2013 Sub-Area Plan, transportation infrastructure improvements would be phased under the proposed *2018 Sub-Area Plan* to keep pace with proposed redevelopment of the Waterfront District.

Tables 3.4-2 and 3.4-3 summarize the on-site and off-site improvements and the level of development that could be accommodated with the improvements for each phase. The phasing examines the Marine Trades area separate from the Downtown Waterfront, Log Pond, Shipping Terminal, and Cornwall Beach redevelopment areas. The capacity of the transportation system is based on the total outbound PM peak hour vehicular capacity (i.e., existing on-site vehicle trips plus net new project-related vehicle trips). The outbound direction generates the highest demand during the PM peak hour for the assumed set of land uses. This capacity represents the maximum number of outbound weekday PM peak hour trips that could be accommodated with the assumed infrastructure improvements. The approximate square-feet of development related to the outbound vehicle trip threshold is presented in the tables. The proposed land use and associated trip generation is also presented in **Tables 3.4-2 and 3.4-3** to provide an understanding of how the 2018 proposal compares to the anticipated infrastructure capacity.

While the specific phasing of transportation infrastructure improvements has been slightly modified to reflect changes to the proposal under the proposed *2018 Sub-Area Plan*, the proposed phasing plan ensures that transportation infrastructure improvements keeps pace with development on the site. The biennial monitoring system would be used to affirm that the transportation improvements are sufficient to accommodate the anticipated trip generation.

Table 3.4-2
PHASING OF TRANSPORTATION INFRASTRUCTURE IMPROVEMENTS AND ASSOCIATED DEVELOPMENT POTENTIAL – NORTH OF WATERWAY¹

			PM Peak Hour Outbound Vehicles				Development in Millions of sf			
Project Sequence	On-Site Improvements	Off-Site Mitigation ²	Existing Development to Remain	2018 Proposal New Development	Proposed Infrastructure Threshold ³	Remaining Trip Capacity	Existing Development to Remain	2018 Proposal New Development	Approximate Infrastructure Capacity ^{4,5}	Remaining Infrastructure Capacity
Existing Street Network (with continued Industrial Usage) ⁶			230	-	400	170	0.35	-	0.6	0.25
Phase 1: Activate Downtown Waterfront Area (See Table 3.7-2)			230	30	400	140	0.35	0.08	0.6	0.17
Phase 2: Activate Cornwall Beach (See Table 3.7-2)			230	75	400	95	0.35	0.15	0.6	0.1
Phase 3: Bay Street Connection to Downtown (See Table 3.7-2)			230	105	400	65	0.35	0.2	0.6	0.05
Phase 4: Activate Marine Trades Area and Marina										
4.1	Upgrade F Street (including signal at Roeder Avenue) to new Maple Street	Designated Truck Routes Plan								
4.2	Construct Maple Street and Chestnut Street within Marine Trades	Develop plan for Holly Street Striping, Access, Channelization, and Parking. Coordinate with Old Town Planning.	230	215	550	105	0.35	0.35	0.8	0.1
Phase 5: Rail Relocation and Full Build-out of Downtown Area										
5.1	Upgrade C Street at Roeder Avenue including signalize and turn lanes along C Street	Signalize C Street intersection with Holly Street and provide turn lanes along C Street.			750		0.35		1.1	
5.2	Upgrade Hilton Avenue at Roeder Avenue including traffic signal and turn lanes along Hilton Avenue	Upgrade Roeder Avenue between Hilton Avenue and C Street with additional drop/turn lanes at major intersections.			1,000		0.35		1.5	
		Improve Holly Street from F Street to Champion Street to provide turn lanes or restrict movements at intersections and enhanced pedestrian facilities (Based on Holly Street Striping, Access, Channelization, and Parking Plan).	230	755	1,150	165	0.35	1.15	1.7	0.2

Source: Transpo Group, March 2018

1. The infrastructure phasing addresses the Marine Trades Area separate from the Downtown Waterfront, Log Pong, Shipping Terminal, and Cornwall Beach Areas.
2. The off-site mitigation represents those improvements needed to support the redevelopment.
3. Outbound vehicle trips represent peak direction of travel during the PM peak hour. This threshold represents the number of weekday PM peak hour trips that could be accommodated without additional infrastructure.
4. Approximate square-footage is provided for reference and is based on the average outbound vehicle trip rate of 660 trips per 1.0 million square-feet related. This is based on an average rate as seen from the 2018 Sub-Area Plan analyzed and assumes mode splits consistent with the 2008 EIS. Depending on the land use mix, the actual square-footage of the development that can be accommodated could be higher or lower than shown. The PM peak hour outbound vehicle trip threshold should be used to evaluate infrastructure needs and not the development square-footage.
5. The capacity assumes that infrastructure is constructed or planned such that 1) the City has completed design of infrastructure; 2) the City has secured financial commitments; and 3) the infrastructure will be constructed within a three (3) year period and/or transit service is actively available to new development within the Waterfront District.
6. The existing street network has 0.5 million square feet of development capacity assuming areas of the site are utilized for industrial development.

Table 3.4-3
PHASING OF TRANSPORTATION INFRASTRUCTURE IMPROVEMENTS AND ASSOCIATED DEVELOPMENT POTENTIAL – SOUTH OF WATERWAY¹

			PM Peak Hour Outbound Vehicles				Development in Millions of sf			
			Existing Development to Remain	2018 Proposal New Development	Threshold ³	Remaining Trip Capacity	Existing Development to Remain	2018 Proposal New Development	Approximate Infrastructure Capacity ^{4,5}	Remaining Infrastructure Capacity
Project Sequence	On-Site Improvements	Off-Site Mitigation ²								
Existing Street Network (with continued Industrial Usage) ⁶			130	-	975 ⁵	845	0.22	-	1.7 ⁵	1.48
Phase 1: Activate Downtown Waterfront Area										
1.1	Rebuild temporary Central Avenue		130	190	475	155	0.22	0.5	1.2	0.48
1.2	Construct Granary Avenue to Laurel Street	Signalize intersection at Granary Avenue and Roeder Avenue	130	190	750	430	0.22	0.5	1.8	1.08
1.3	Build Laurel Street to Cornwall Avenue, including at-grade crossing along Laurel Street and Cornwall Avenue		130	190	750	430	0.22	0.5	1.8	1.08
Phase 2: Activate Cornwall Beach										
2.1	Construct local roads off Granary Avenue and Laurel Street including connection to Cornwall Beach	Transit Strategy and Facilities Plan Traffic signal at Laurel Street/Cornwall Avenue	130	380	1,025	515	0.22	1.0	2.5	1.28
Phase 3: Infill in Downtown Area										
3.1	Bay Street Parking Garage	Signalize Bay Street/Chestnut Street	130	620	1,425	675	0.22	1.6	3.5	1.68
3.2	Complete construction local roads in Downtown Area		130	620	1,500	750	0.22	1.6	3.6	1.78
Phase 4: Activate Marine Trades Area and Marina (see Table 3.7-1)			130	890	1,500	610	0.22	2.25	3.6	1.13
Phase 5: Rail Relocation and Full Build-out of Downtown Area										
5.1	Cornwall Bridge closed to relocate BNSF railroad	Provide a northbound left-turn lane and shared through/right-turn lane, and upgrade traffic signal at Cornwall Avenue/Chestnut Street.	130	1,430	1,100	-330	0.22	3.58	2.7 ⁷	-1.1
5.2	Rebuild Cornwall Bridge with three lanes	Right turn drop lane along Cornwall Avenue at Maple Street. Signalize Maple Street/Cornwall Avenue, Maple Street/State Street, Maple Street/Forest Street and upgrade Maple Street with shared lanes and enhanced pedestrian facilities.	130	1,430	2,050	620	0.22	3.58	5.0	1.2

Source: Transpo Group, March 2018

1. The infrastructure phasing addresses the Marine Trades Area separate from the Downtown Waterfront, Log Pong, Shipping Terminal, and Cornwall Beach Areas.
2. The off-site mitigation represents those improvements needed to support the redevelopment.
3. Outbound vehicle trips represent peak direction of travel during the PM peak hour. This threshold represents the number of weekday PM peak hour trips that could be accommodated without additional infrastructure.
4. Approximate square-footage is provided for reference and is based on the average outbound vehicle trip rate of 410 trips per 1.0 million square-feet related. This is based on an average rate as seen from the 2018 Sub-Area Plan analyzed and assumes mode splits consistent with the 2008 EIS. Depending on the land use mix, the actual square-footage of the development that can be accommodated could be higher or lower than shown. The PM peak hour outbound vehicle trip threshold should be used to evaluate infrastructure needs and not the development square-footage.
5. The capacity assumes that infrastructure is constructed or planned such that 1) the City has completed design of infrastructure; 2) the City has secured financial commitments; and 3) the infrastructure will be constructed within a three (3) year period and/or transit service is actively available to new development within the Waterfront District.
6. The existing street network has 1.7 million square feet of development capacity assuming the southwestern areas of the site are utilized for industrial development, using available capacity on both Cornwall Avenue and Wharf Street.
7. The total on-site capacity would be capped at 1,100 outbound PM peak hour vehicles (approximately 2.7 million square-feet) while the Cornwall Bridge is rebuilt and the railroad is relocated to accommodate anticipated traffic generation within the adopted LOS standards during construction. Alternatively, the City could allow arterials serving the site to temporarily experience higher levels of vehicle traffic congestion. Consideration should be given to traffic safety and impacts on all modes to and from the site if this was to occur. Impacts could be evaluated through the biennial monitoring.

3.4.5 Significant Unavoidable Adverse Impacts

As described in the 2008 DEIS, 2008 SDEIS and the 2010 and 2012 EIS Addendum, the proposed *2018 Sub-Area Plan* accommodates additional amounts of future development within the site which contributes to travel demands and congestion along the onsite and offsite street system. The additional development and associated improvements also increases traffic access and circulation in the area. Without mitigation, this added congestion would contribute to measurably poorer performance of the transportation network, in terms of increased delays along several of the corridors and at some specific intersections. The increase in traffic and higher volumes of pedestrians and bicycles would result in more conflict points and increased hazards to safety. With the implementation of the identified mitigation measures, significant unavoidable adverse impacts would be prevented or substantially lessened so that no new significant unavoidable adverse impacts are anticipated under the proposed *2018 Sub-Area Plan*.

Distribution List

APPENDIX A DISTRIBUTION LIST

Federal Agencies

United States Army Corps of Engineers
United States Environmental Protection Agency*
United States Fish & Wildlife Service
United States National Oceanic and Atmospheric Administration

State Agencies

Washington State Department of Archaeology & Historic Preservation
Washington State Department of Community, Trade and Economic Development*
Washington State Department of Ecology
Washington State Department of Fish and Wildlife
Washington State Department of Natural Resources
Washington State Department of Transportation

Tribes

Lummi Nation
Nooksack Tribe

Regional Agencies

Northwest Clean Air Agency
Puget Sound Partnership

Local Agencies, Commissions/Associations and Other Entities

Bellingham School District*
Cascade Natural Gas*
City of Bellingham

- Mayor
- City Council
- Planning Commission
- Staff
- Mayor's Neighborhood Advisory Commission
- CBD Neighborhood Association*
- Lettered Streets Neighborhood Association*
- Sehome Neighborhood Association*
- South Hill Neighborhood Association*

Port of Bellingham

- Port Commissioners
- SEPA Official
- Staff

Puget Sound Energy*
Western Washington University
Whatcom County Planning and Development Services
Whatcom Transit Authority

Public Libraries

City of Bellingham Library

**Provided Notice of Availability*

Transportation Trip Generation Table

Mode Split and Occupancy									
Mode	2000 Census	2008 EIS Office/							
		Mode Split	Average	Institutional	Light Ind	Residential	Retail	Restaurant	Marina
Auto	84%	75%	79%	80%	80%	75%	75%	75%	90%
Transit	4%	6%	5%	5%	5%	6%	5%	5%	5%
Walk/Bike/									
Other	12%	19%	16%	15%	15%	19%	20%	20%	5%
AVO	1.08		1.46	1.32	1.3	1.7	1.43	1.52	1.5

Calculation of Daily Person Trip Rates			
Land Use	Vehicle	AVO	Person
Office	9.74	1.32	12.86
Institutional	11.26	1.32	14.86
Light Industrial	4.96	1.30	8.43
Low-Rise	7.32	1.70	12.44
Mid-Rise	5.44	1.70	9.25
High-Rise	4.45	1.70	7.57
Retail	37.75	1.43	53.98
Restaurant	112.18	1.52	170.51
Boat Launch	2.41	1.5	3.62

Percent of Daily Trips During Peak Hours		
Land Use	PM	AM
Office	12%	12%
Institutional	4%	4%
Light Industrial	13%	14%
Low-Rise	8%	6%
Mid-Rise	8%	7%
High-Rise	8%	7%
Retail	10%	2%
Restaurant	9%	9%
Marina	9%	3%

Note: Based on ratio of ITE daily trip rate to peak hour trip rate from *Trip Generation Manual* 10th Edition.

ITE Vehicle Trip Rates		
Land Use	PM	AM
Office	1.15	1.16
R&D	0.49	0.42
Light Industrial	0.63	0.70
Low-Rise	0.56	0.46
Mid-Rise	0.44	0.36
High-Rise	0.36	0.31
Retail	3.81	0.94
Restaurant	9.77	9.94
Marina	0.21	0.07

Area	Land Use	Size	Units	Daily Person Trips				PM Peak Hour Person Trips				PM Peak Hour Vehicle Trips			PM Peak Hour Vehicle Trips			AM Peak Hour Person Trips				AM Peak Hour Vehicle Trips			AM Peak Hour Vehicle Trips		
				By Mode				By Mode				Based on Person Trips			Based on ITE			By Mode				Based on Person Trips			Based on ITE		
				Auto	Transit	Walk/ Bike/Other	Total	Auto	Transit	Walk/ Bike/Other	Total	In	Out	Total	In	Out	Total	Auto	Transit	Walk/ Bike/Other	Total	In	Out	Total	In	Out	Total
Marine Trades	Office	450,000 sf		4,630	289	868	5,787	555	35	104	694	71	349	420	88	430	518	555	35	104	694	370	50	420	459	63	522
	Institutional	0 sf		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Light Industrial	1,000,000 sf		6,744	422	1,264	8,430	877	55	164	1,096	81	594	675	76	554	630	944	59	177	1,180	639	87	726	616	84	700
	Low-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Mid-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	High-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Retail	39,000 sf		1,579	105	421	2,105	158	11	42	211	53	57	110	72	77	149	32	2	8	42	13	9	22	23	14	37
	Restaurant	11,000 sf		1,407	94	375	1,876	127	8	34	169	51	33	84	65	42	107	127	8	34	169	44	40	84	57	52	109
	Boat Launch	460 berths		1,499	83	83	1,665	135	8	7	150	54	36	90	58	39	97	45	3	2	50	10	20	30	11	21	32
	Existing Area Trips	353 emp		1,480	0	0	1,480	148	0	0	148	31	117	148	31	117	148	155	0	0	0	129	26	155	129	26	155
	Internal Trips			2,123	139	435	2,697	231	15	47	293	83	83	166	61	61	122	167	11	33	211	61	60	121	41	40	81
Net New Trips Subtotal			12,256	854	2,576	15,686	1,473	102	304	1,879	196	869	1,065	267	964	1,231	1,381	96	292	1,924	886	120	1,006	996	168	1,164	
	Office	567,800 sf		5,842	365	1,095	7,302	701	44	131	876	90	441	531	111	542	653	701	44	131	876	467	64	531	580	79	659
	Institutional	0 sf		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Light Industrial	0 sf		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Low-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Mid-Rise	769 du		5,335	427	1,351	7,113	427	34	108	569	163	88	251	220	118	338	374	30	94	498	44	176	220	55	222	277
	High-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Retail	105,611 sf		4,276	285	1,140	5,701	428	29	113	570	144	155	299	193	209	402	86	6	22	114	37	23	60	60	39	99
	Restaurant	12,492 sf		1,598	107	425	2,130	144	10	38	192	58	37	95	74	48	122	144	10	38	192	49	46	95	64	60	124
	Existing Area Trips	230 emp		970	0	0	970	97	0	0	97	20	77	97	20	77	97	101	0	0	0	84	17	101	84	17	101
	Internal Trips			2,283	166	580	3,029	212	15	52	279	70	71	141	62	61	123	128	9	29	166	43	42	85	34	33	67
	Net New Trips Subtotal			13,798	1,018	3,431	18,247	1,391	102	338	1,831	365	573	938	516	779	1,295	1,076	81	256	1,514	470	250	720	641	350	991
Downtown Waterfront	Office	126,700 sf		1,303	81	245	1,629	156	10	29	195	20	98	118	25	121	146	156	10	29	195	104	14	118	129	18	147
	Institutional	0 sf		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Light Industrial	0 sf		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Low-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Mid-Rise	172 du		1,193	95	303	1,591	95	8	24	127	36	20	56	49	27	76	83	7	21	111	10	39	49	12	50	62
	High-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Retail	23,566 sf		954	64	254	1,272	95	6	26	127	32	34	66	43	47	90	19	1	5	25	8	5	13	13	9	22
	Restaurant	2,787 sf		356	24	95	475	32	2	9	43	13	8	21	16	11	27	32	2	9	43	11	10	21	15	13	28
	Existing Area Trips	0 emp		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Internal Trips			510	37	130	677	47	3	12	62	15	16	31	14	14	28	28	2	7	37	10	10	19	8	7	15
	Net New Trips Subtotal			3,296	227	767	4,290	331	23	76	430	86	144	230	119	192	311	262	18	57	337	123	58	182	161	83	244
	Office	257,000 sf		2,644	165	496	3,305	318	20	59	397	41	200	241	50	246	296	318	20	59	397	212	29	241	262	36	298
	Institutional	0 sf		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Light Industrial	0 sf		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Low-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Mid-Rise	348 du		2,414	193	612	3,219	194	15	49	258	74	40	114	99	54	153	169	14	42	225	20	79	99	25	100	125
	High-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Retail	47,802 sf		1,935	129	516	2,580	194	13	51	258	65	71	136	87	95	182	39	3	10	52	16	11	27	27	18	45
	Restaurant	5,654 sf		723	48	193	964	65	4	18	87	26	17	43	34	21	55	65	4	18	87	22	21	43	29	27	56
	Existing Area Trips	0 emp		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Internal Trips			1,033	75	263	1,371	96	7	24	127	32	32	64	28	28	56	58	4	13	75	20	19	39	15	15	30
	Net New Trips Subtotal			6,683	460	1,554	8,697	675	45	153	873	174	296	470	242	388	630	533	37	116	686	250	121	371	328	166	494

Area	Land Use	Size	Units	Daily Person Trips				PM Peak Hour Person Trips				PM Peak Hour Vehicle Trips			PM Peak Hour Vehicle Trips			AM Peak Hour Person Trips				AM Peak Hour Vehicle Trips			AM Peak Hour Vehicle Trips		
				By Mode				By Mode				Based on Person Trips			Based on ITE			By Mode				Based on Person Trips			Based on ITE		
				Auto	Transit	Walk/ Bike/Other	Total	Auto	Transit	Walk/ Bike/Other	Total	In	Out	Total	In	Out	Total	Auto	Transit	Walk/ Bike/Other	Total	In	Out	Total	In	Out	Total
Downtown Waterfront / Long Pond	Office	53,710 sf		553	35	103	691	66	4	13	83	9	41	50	11	51	62	66	4	13	83	44	6	50	55	7	62
	Institutional	0 sf		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Light Industrial	26,050 sf		176	11	33	220	23	1	5	29	2	16	18	2	14	16	25	2	4	31	17	2	19	16	2	18
	Low-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Mid-Rise	66 du		458	37	116	611	37	3	9	49	14	8	22	19	10	29	32	3	8	43	4	15	19	5	19	24
	High-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Retail	9,021 sf		365	24	98	487	37	2	10	49	12	14	26	16	18	34	8	1	1	10	4	2	6	5	3	8
	Restaurant	1,067 sf		137	9	36	182	12	1	3	16	5	3	8	6	4	10	12	1	3	16	4	4	8	6	5	11
	Existing Area Trips	0 emp		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Internal Trips			226	16	56	298	22	1	5	28	8	7	15	6	6	12	14	1	3	18	5	5	10	4	3	7
Net New Trips Subtotal			1,463	100	330	1,893	153	10	35	198	34	75	109	48	91	139	129	10	26	165	68	24	92	83	33	116	
Log Pond	Office	7,510 sf		78	5	14	97	10	1	1	12	1	7	8	2	7	9	10	1	1	12	7	1	8	8	1	9
	Institutional	0 sf		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Light Industrial	37,550 sf		254	16	47	317	33	2	6	41	3	22	25	3	21	24	35	2	7	44	24	3	27	23	3	26
	Low-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Mid-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	High-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Retail	0 sf		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Restaurant	0 sf		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Existing Area Trips	20 emp		80	0	0	80	8	0	0	8	2	6	8	2	6	8	9	0	0	0	7	2	9	7	2	9
	Internal Trips			44	3	9	56	5	0	1	6	2	2	4	2	1	3	4	0	1	5	1	2	3	1	1	2
Net New Trips Subtotal			208	18	52	278	30	3	6	39	0	21	21	1	21	22	32	3	7	51	23	0	23	23	1	24	
Log Pond / Shipping Terminal	Office	10,390 sf		107	7	20	134	13	1	2	16	2	8	10	2	10	12	13	1	2	16	9	1	10	11	1	12
	Institutional	0 sf		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Light Industrial	73,594 sf		496	31	93	620	65	4	12	81	6	44	50	6	40	46	70	4	13	87	48	6	54	46	6	52
	Low-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Mid-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	High-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Retail	1,160 sf		47	3	13	63	5	0	1	6	1	2	3	2	2	4	1	0	0	1	1	0	1	1	0	1
	Restaurant	387 sf		50	3	13	66	5	0	1	6	2	1	3	2	2	4	5	0	1	6	2	1	3	2	2	4
	Existing Area Trips	0 emp		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Internal Trips			94	6	20	120	11	1	2	14	4	4	8	3	2	5	9	1	2	12	3	3	6	2	2	4
Net New Trips Subtotal			606	38	119	763	77	4	14	95	7	51	58	9	52	61	80	4	14	98	57	5	62	58	7	65	
Log Pond	Office	26,890 sf		277	17	52	346	34	2	6	42	4	22	26	5	26	31	34	2	6	42	23	3	26	27	4	31
	Institutional	0 sf		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Light Industrial	134,450 sf		906	57	170	1,133	118	7	22	147	11	80	91	10	75	85	127	8	24	159	86	12	98	83	11	94
	Low-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Mid-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	High-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Retail	0 sf		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Restaurant	0 sf		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Existing Area Trips	0 emp		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Internal Trips			158	10	32	200	19	1	4	24	7	7	14	5	4	9	16	1	3	20	6	6	12	4	3	7
Net New Trips Subtotal			1,025	64	190	1,279	133	8	24	165	8	95	103	10	97	107	145	9	27	181	103	9	112	106	12	118	
Shipping Terminal	Office	0 sf		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Institutional	0 sf		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Light Industrial	258,356 sf		1,742	109	327	2,178	226	14	43	283	21	153	174	20	143	163	244	15	46	305	165	23	188	159	22	

Area	Land Use	Size	Units	Daily Person Trips				PM Peak Hour Person Trips				PM Peak Hour Vehicle Trips			PM Peak Hour Vehicle Trips			AM Peak Hour Person Trips				AM Peak Hour Vehicle Trips			AM Peak Hour Vehicle Trips		
				By Mode				By Mode				Based on Person Trips			Based on ITE			By Mode				Based on Person Trips			Based on ITE		
				Auto	Transit	Walk/ Bike/Other	Total	Auto	Transit	Walk/ Bike/Other	Total	In	Out	Total	In	Out	Total	Auto	Transit	Bike/Other	Total	In	Out	Total	In	Out	Total
Sub-Total Project Trips																											
	Office	1,510,000 sf		15,537	970	2,913	19,420	1,865	118	347	2,330	240	1,173	1,413	296	1,443	1,739	1,865	118	347	2,330	1,244	169	1,413	1,542	210	1,752
	Institutional	0 sf		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Light Industrial	1,530,000 sf		10,318	646	1,934	12,898	1,342	83	252	1,677	124	909	1,033	117	847	964	1,445	90	271	1,806	979	133	1,112	943	128	1,071
	Low-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Mid-Rise	1,647 du		11,426	914	2,895	15,235	915	73	231	1,219	349	189	538	470	254	724	800	65	201	1,066	95	376	471	118	475	593
	High-Rise	0 du		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Retail	242,000 sf		9,797	652	2,614	13,063	981	66	260	1,307	329	356	685	442	480	922	198	14	49	261	85	53	138	138	89	227
	Restaurant	43,000 sf		5,501	367	1,465	7,333	496	33	132	661	199	128	327	254	165	419	496	33	132	661	170	157	327	223	205	428
	Boat Launch	460 berths		1,499	83	83	1,665	135	8	7	150	54	36	90	58	39	97	45	3	2	50	10	20	30	11	21	32
Total Project Trips				54,078	3,632	11,904	69,614	5,734	381	1,229	7,344	1,295	2,791	4,086	1,637	3,228	4,865	4,849	323	1,002	6,174	2,583	908	3,491	2,975	1,128	4,103
Sub-Total Trip Reductions																											
	Existing Area Trips	645 emp		2,760	0	0	2,760	276	0	0	276	59	217	276	59	217	276	286	0	0	0	236	50	286	236	50	286
	Internal Trips			7,240	510	1,720	9,470	714	50	165	929	245	246	491	200	196	396	475	33	103	611	166	164	329	121	116	237
Net New Project Trips				44,078	3,122	10,184	57,384	4,744	331	1,064	6,139	991	2,328	3,319	1,378	2,815	4,193	4,088	290	899	5,563	2,181	694	2,876	2,618	962	3,580

Selected 2013 Sub-Area Plan Figures

THE waterfront DISTRICT

BELLINGHAM  WASHINGTON



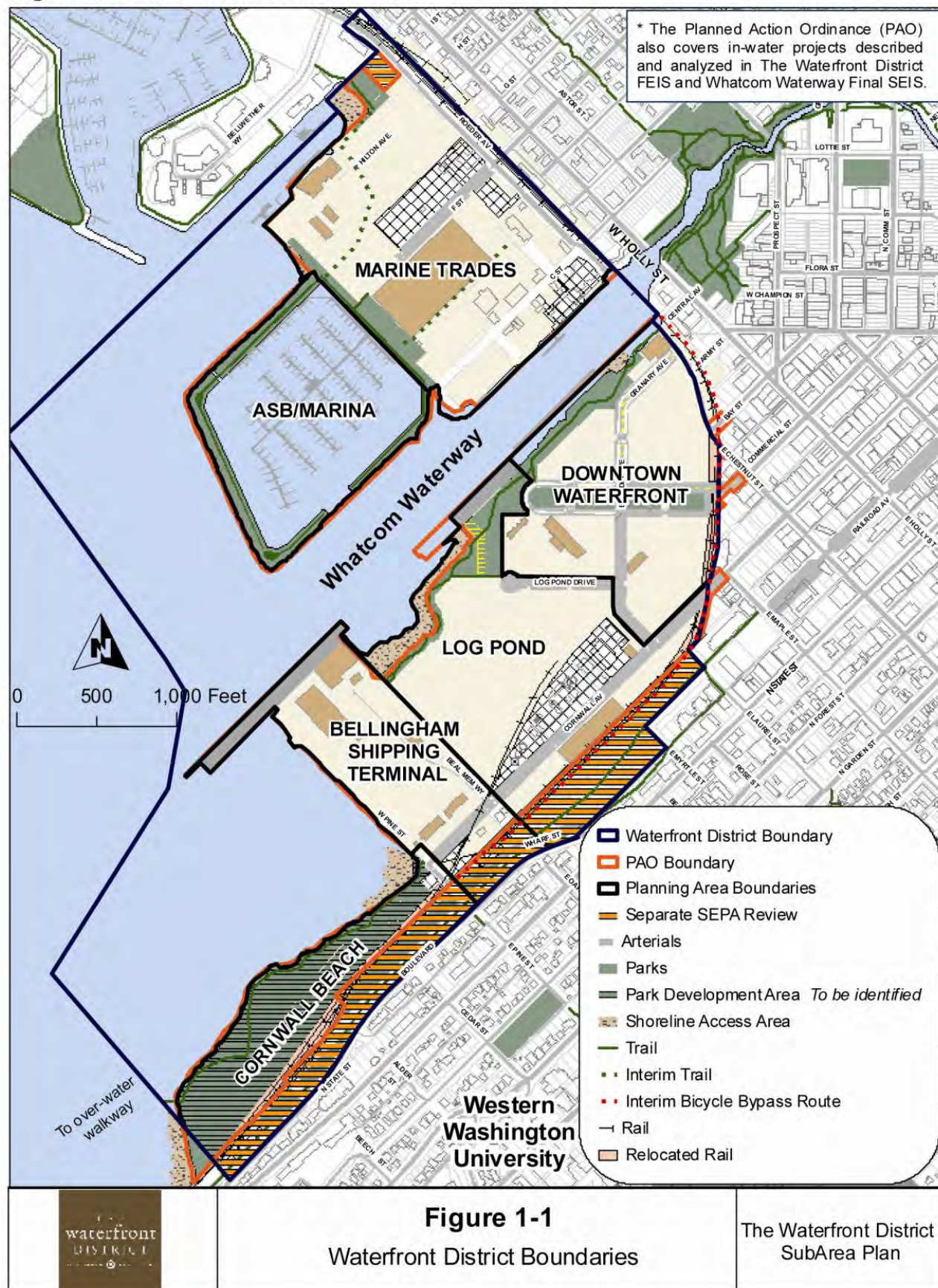
Stephanie Bower, Architectural Illustration

Sub-Area Plan

2013

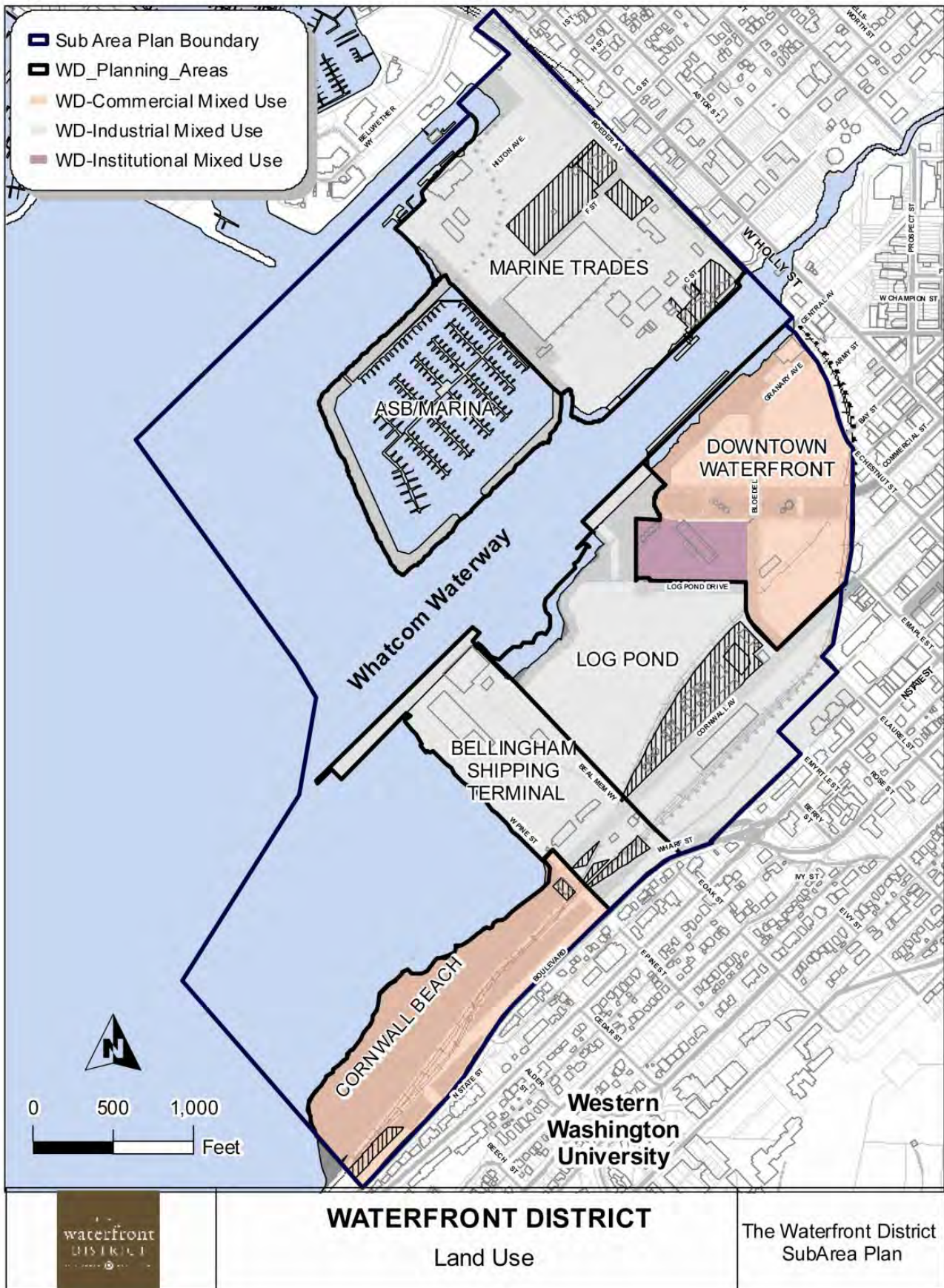
A Port of Bellingham/City of Bellingham
Partnership Project

Figure 1-1: Waterfront District Boundaries



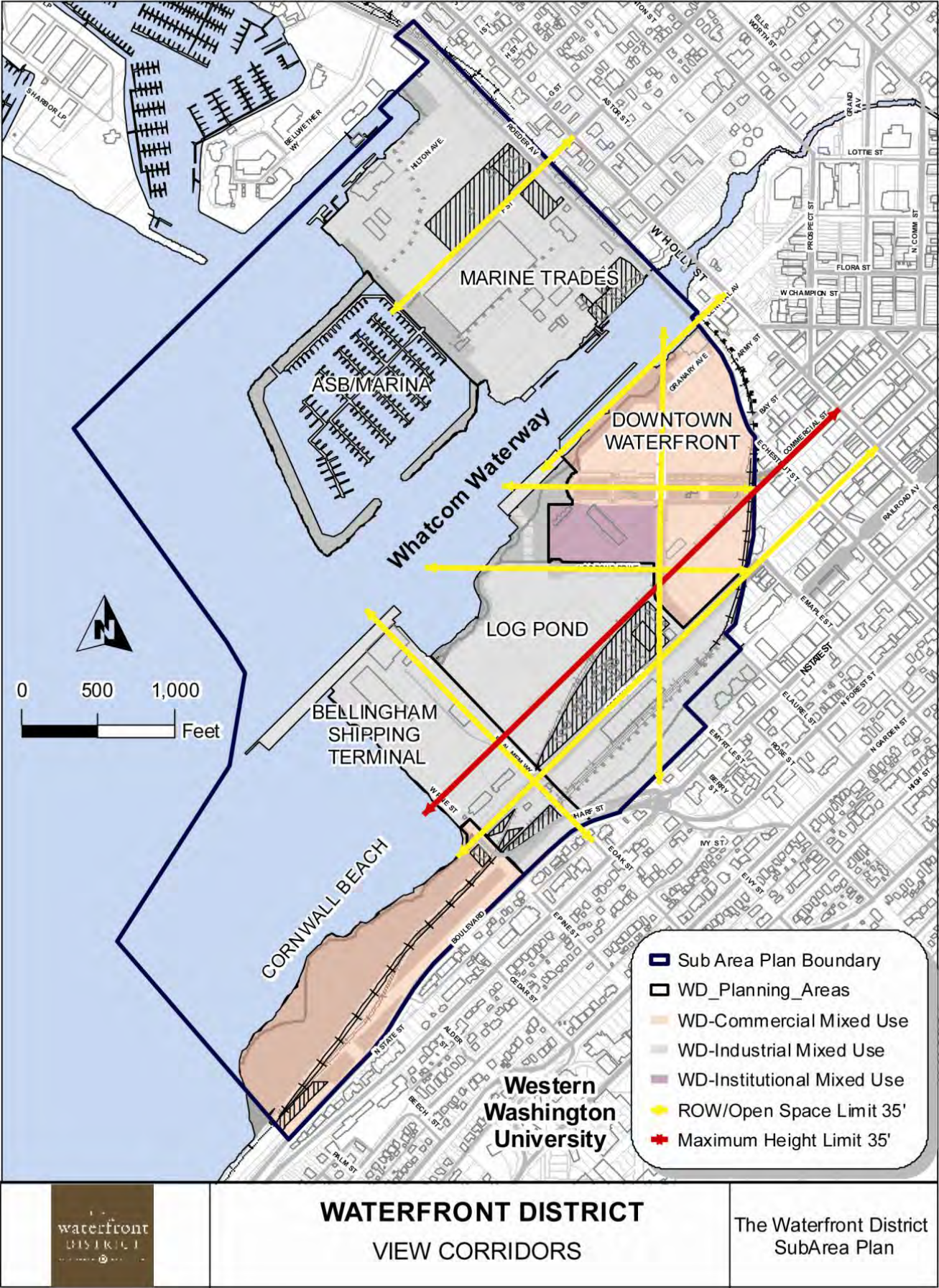
For comparison with **Figure 2-1** of this EIS Addendum

Figure 4-4: Waterfront District Urban Village Boundary & Land Use Areas



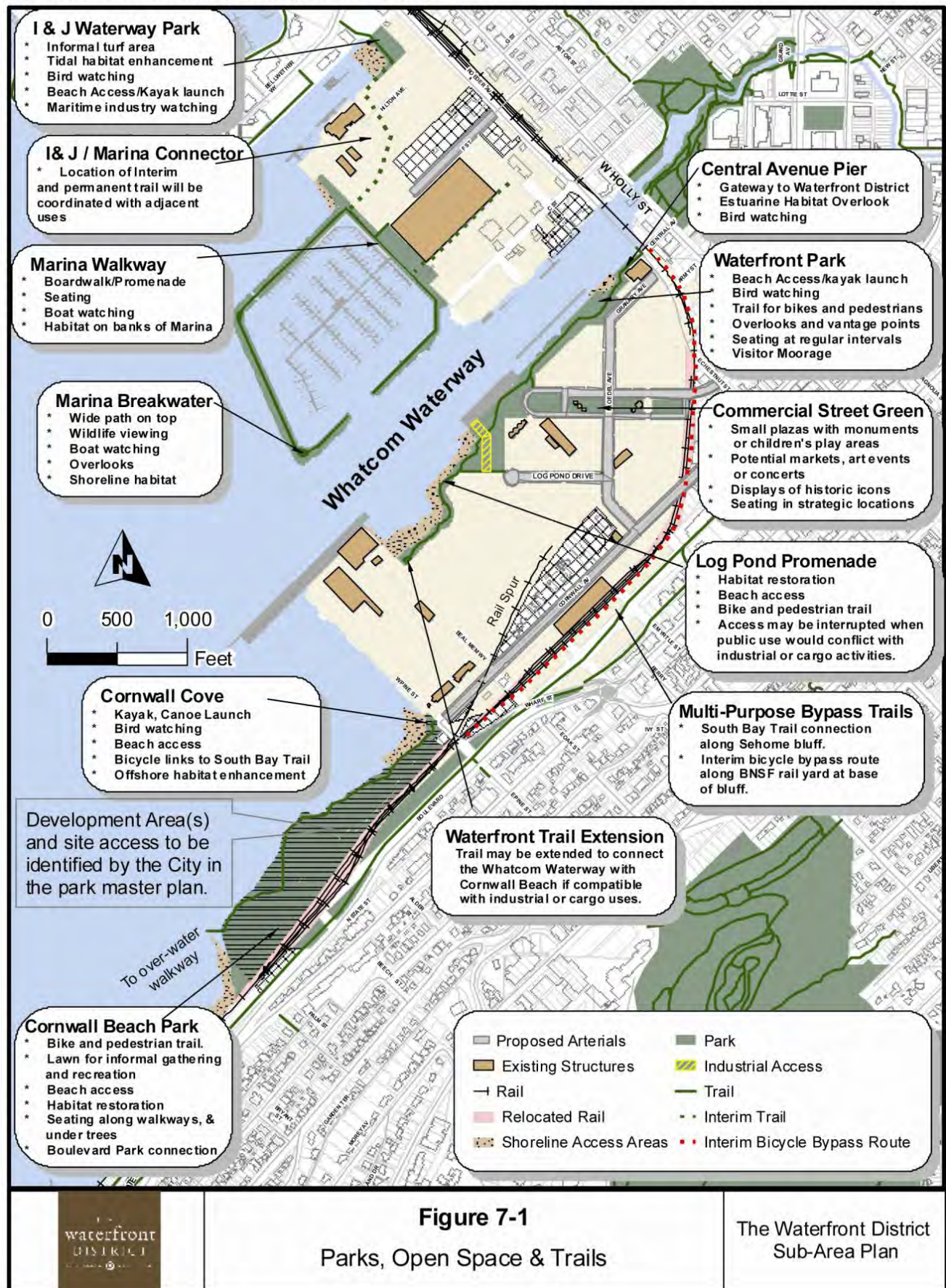
For comparison with *Figure 2-2* of this EIS Addendum

Figure 4-2: Waterfront District Urban Village View Corridors



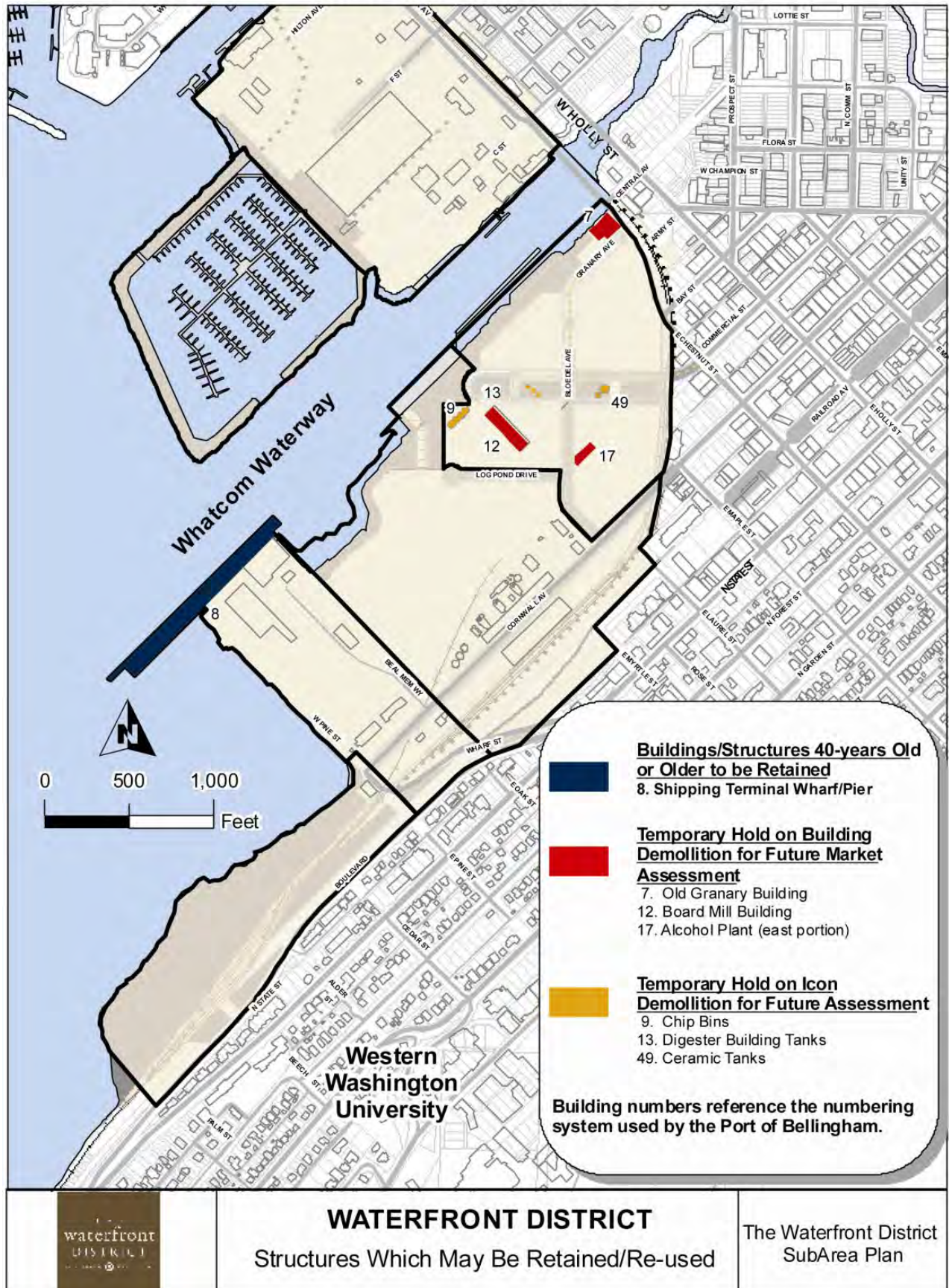
For comparison with *Figure 2-3* of this EIS Addendum

Figure 7-1: Parks, Open Space & Trails



For comparison with **Figure 2-4** of this EIS Addendum

Figure 4-3: Structures Which Maybe Retained/Re-used



For comparison with **Figure 2-10** of this EIS Addendum