

Cornwall Park Neighborhood Area 7 Updated Institutional Master Plan

Adopted September 25, 2023



TABLE OF CONTENTS

I.	INTRODUCTION.....	5
A	2022 IMP Amendment Background and Review Process	6
II.	OVERVIEW OF AREA 7 INSTITUTIONAL MASTER PLAN.....	8
A	Scope of the Institutional Master Plan.....	8
B	Relationship of the IMP to Existing Regulatory Processes.....	8
III.	ELEMENTS.....	9
A	Land Use	11
B	Vehicular Circulation.....	14
C	Pedestrian/Bicycle Connectivity.....	16
D	Helicopter Circulation	20
E	Utilities.....	20
F	Phased Development Schedule.....	24
G	Open Space.....	27
IV.	STANDARDS.....	29
A	Permitted Uses.....	29
B	Building Height Limitations.....	30
C	Site Coverage Limitation.....	30
D	Open Space Requirements	30
E	Setback Requirements	30
F	Landscape Requirements	31
G	Parking & Loading Requirements	32
H	Street Standards	33
I	Signage Standards	33
J	Lighting Standards.....	33
K	Accessible Access.....	34
L	Modifications.....	34
M	Cultural Resources.....	34
V.	APPENDICES.....	35
A	Appendix A	
B	Appendix B	
C	Appendix C	

List of Figures

Figure 1. Institutional Master Plan Existing Property Map.....	10
Figure 2. Land Use Zones within the IMP Area.....	12
Figure 3. Land Use Zones Adjacent to IMP Area	13
Figure 4. Conceptual Cross-Sections east of the East Parking Garage (top) and west of proposed West Pavilion (bottom).....	15
Figure 5 . Internal vehicular circulation.....	17
Figure 6. Pedestrian/Bicycle Connectivity	18
Figure 7. Utility Plan	23
Figure 8. St. Joseph Medical Center Proposed Major Development Projects	26
Figure 9. Open Space Plan	28

I. INTRODUCTION

Founded in 1891, St. Joseph Medical Center (SJMC) is owned and operated by PeaceHealth as a non-profit, voluntary, private institution and is the second largest employer in Whatcom County. SJMC operates 300 beds, with 255 licensed as in-patient beds, on its Main Campus on Squalicum Parkway with a level II trauma center. The Squalicum Parkway facility and campus are devoted to acute care and supporting medical services and is classified as Area 7 in the Cornwall Park Neighborhood Plan. This document focuses exclusively on the Squalicum Parkway facility and campus.

The City of Bellingham requires that large campus type public or quasi-public uses on sites of 50 acres or more be developed under an approved Institutional Master Plan (IMP). The first IMP for the SJMC Main Medical Campus was approved in 1983. The comprehensive plan described the buildings and other facilities required to meet projections for long-term health care needs of the SJMC service area. The updated 2006 IMP was prepared in order to anticipate and serve future needs.

In preparation for submitting the updated 2006 Area 7 IMP, PeaceHealth initiated a Regional Institutional Master Planning process in 2003 to determine how the Medical Center could best serve future needs of the region through 2025. The comprehensive planning process included a refinement of the Medical Center's vision and goals, analysis of existing facility and site

conditions, assessment of demographic and health care trends, workload and space needs projections and financial feasibility.

This planning process included several opportunities for public input, including three open houses held in late 2005/early 2006.

The process concluded that PeaceHealth's primary focus in Whatcom County should be the provision of acute level services at the medical center on Squalicum Parkway, supported by multiple outpatient facilities that focus on primary care, diagnostic imaging, Same Day/Urgent Care services, and other healthcare services not requiring a hospital stay.

Since adoption of the 2006 IMP, PeaceHealth has adjusted its future planned development to reflect changes in the region's projected healthcare needs. New data suggest that Whatcom County is experiencing continued population growth with an expected population increase of approximately 48 percent between 2000 and 2025. Much of that growth will be due to the increasing percentage of the senior population. This 2022 IMP Amendment has been prepared to describe updated existing conditions and refinements in the Hospital's future development plans to meet future needs through 2042.

A 2022 IMP Amendment Background and Review Process

Since the 2006 IMP update, population growth in the PeaceHealth St. Joseph service area and an increase in demand for medical procedures, particularly during the COVID-19 pandemic, have resulted in a higher community demand for acute hospital services. A shift toward single-patient rooms rather than the shared, multiple-bed per room model of the past, requires additional or remodeled floor space to accommodate current patient needs.

PeaceHealth has determined that a combination of expansion and interior remodel of existing hospital buildings would be the most beneficial path forward to meet community needs. As the growing utilization of the hospital is reviewed, trends show that a higher number of routine procedures that used to require stays in the hospital are now performed in clinic and outpatient surgical facilities. This trend shows that patients in hospitals typically have more complex, emergency, or critical-care needs. PeaceHealth is responding to these trends by focusing future development areas of the campus to improve patient services, expand the emergency department, and upgrade and expand the neonatal, pediatrics, and women health services, as outlined in Section III.F of this IMP Amendment.

The 2022 IMP Amendment is occurring under the City of Bellingham's Type V-A process, which governs City Council quasi-judicial decisions regarding institutional master plans and

amendments, as described in Bellingham Municipal Code (BMC) 21.10.140.

Prior to the initiation of the 2022 IMP Amendment process, two meetings were held with the Cornwall Park Neighborhood Association to apprise them of the upcoming plans: an in-person presentation to the Cornwall Park Neighborhood Association Board in July 2021 and a virtual presentation to the full association at its regular fall meeting in October 2021.

A preapplication conference with the City of Bellingham and the PeaceHealth design team was held on November 23, 2021, and a preapplication neighborhood meeting was held virtually via the Zoom platform on April 20, 2022. Property owners and residents within 500 feet of the IMP boundary, as well as an additional 500 feet north of Birchwood Avenue near the IMP boundary, were invited to the neighborhood meeting via postal mail and email. Another virtual meeting was held in June 2022 to answer specific questions raised in April.

PeaceHealth submitted an application for the IMP Amendment proposal to the City of Bellingham on June 9, 2022. The City published a Notice of Complete Application on August 3, 2022, and held a 30-day public comment period. Another virtual presentation was held in October 2022 to address additional neighborhood questions and concerns.

Next steps for review and approval of the IMP Amendment proposal include the following:

- The Bellingham Planning Commission will hold at least one open record public hearing on the IMP Amendment. Notice of the hearing will be published in a newspaper of general circulation, via mailed notice, and via notices posted on or adjacent to the IMP Amendment site at least 15 days prior to the hearing. Based on the outcome of this process, the Planning Commission will provide a written recommendation to the City Council regarding the IMP Amendment proposal.
- The City Council will consider the IMP Amendment proposal and Planning Commission recommendations at a closed record hearing with the same notification requirements as the Planning Commission hearing. The Council will mail a notice of decision to the applicant within 10 days of the decision, including a statement of any threshold determination made under SEPA.

II. OVERVIEW OF AREA 7 INSTITUTIONAL MASTER PLAN

Area 7 of the Cornwall Park Neighborhood plan is an approximately 87-acre institutional zone (exclusive of public rights-of-way) owned by multiple landowners, including PeaceHealth, which owns approximately eighty percent of the designated area. Area 7 has been defined as an Institutional Zone by the City. An Institutional Master Plan is required to guide future site, building and infrastructure development.

A Scope of the Institutional Master Plan

In accordance with the requirements listed in the City of Bellingham Municipal Code (BMC) 20.40.050, the IMP defines the appropriate land uses; identifies planned circulation and utility improvements; and sets development standards for building heights, setbacks, landscape, parking and signage for Area 7. The Phased Development Projects identified in this IMP are expected to be achieved in a number of phases over an approximate twenty year time period.

The purpose of the IMP is to outline a planned development process for the Institutional Zone that will guide the review and approval of specific building project permit applications over the next

twenty years (through 2042). It lays out the intent of the property owners to develop the Institutional Zone in a coordinated and phased approach anticipating infrastructure needs such as traffic access and circulation, utilities, open space requirements and environmental implications. Once approved it provides a general framework for future development, but each proposed project will require its own permitting process which will address the specific requirements and mitigations for the building project being proposed at the time.

B Relationship of the IMP to Existing Regulatory Processes

Individual projects or improvements described in this IMP will be developed in compliance with all applicable BMC regulations and/or this IMP. Individual projects will go through the City's land use review process, which may include additional procedures such as preapplication meeting with staff, a preapplication neighborhood meeting, land use approvals, State Environmental Policy Act (SEPA) review, and building permit submittals.

III. ELEMENTS

Figure 1 illustrates the 24 facilities that exist within the Institutional Zone as of 2022. The Existing Facilities are here defined in terms of their land area (acres), building gross square footage (GSF) and number of off-street parking stalls.

Existing Facilities	Land Acreage	Building GSF	Parking Stalls
1. St. Joseph Main Medical Center Building	42.4	453,400	1,136
2. St. Luke's Health Education Center	6.4	19,400	186
3. Grabow Therapy & Wellness Center	0.7	12,800	46
4. Medical Arts Building (Bunker Building)	2.7	14,600	47
5. Community Cancer Center	0.7	37,000	46
6. Medical Office Plaza	3.4	39,900	281
7. Northwest Medical Center	1.0	39,900	203
8. St. Francis of Bellingham Extended Health Care	4.5	42,000	82
9. Parkway Medical Center	1.0	12,500	42
10. Wynne Building	1.4	10,900	37
11. Bellingham Day Surgery (Marble Building)	1.0	25,700	72
12. Mt. Baker Imaging	1.3	12,100	50
13. 3130 Ellis Outpatient Clinic	0.8	10,800	55
14. Bellingham Foot & Ankle, Back & Neck Clinics	0.5	3,900	23
15. Bellingham Dental Health Center, Northwest Surgical Association, Vascular Lab & Vein Center	0.9	7,900	35
16. 3120 Squalicum Parkway Medical Clinic	0.3	3,000	17
17. 3130 Squalicum Parkway Medical Office Building	0.4	4,400	22
18. 3136 Squalicum Parkway Medical Clinic	0.4	3,600	18
19. 3200 Squalicum Parkway Medical Office Building	0.7	7,300	37
20. 3232 Squalicum Parkway (Northwest Urologic Tech Services)	0.7	9,800	35
21. 3300 Squalicum Parkway Dental Clinic	0.8	6,600	45
22. Parkway Dental Clinic	2.3	17,600	74
23. Bellingham Childcare & Learning Center	2.0	7,200	13
24. The Willows Retirement Apartments	2.9	129,800	88
Total:	79.29	932,000	2,690

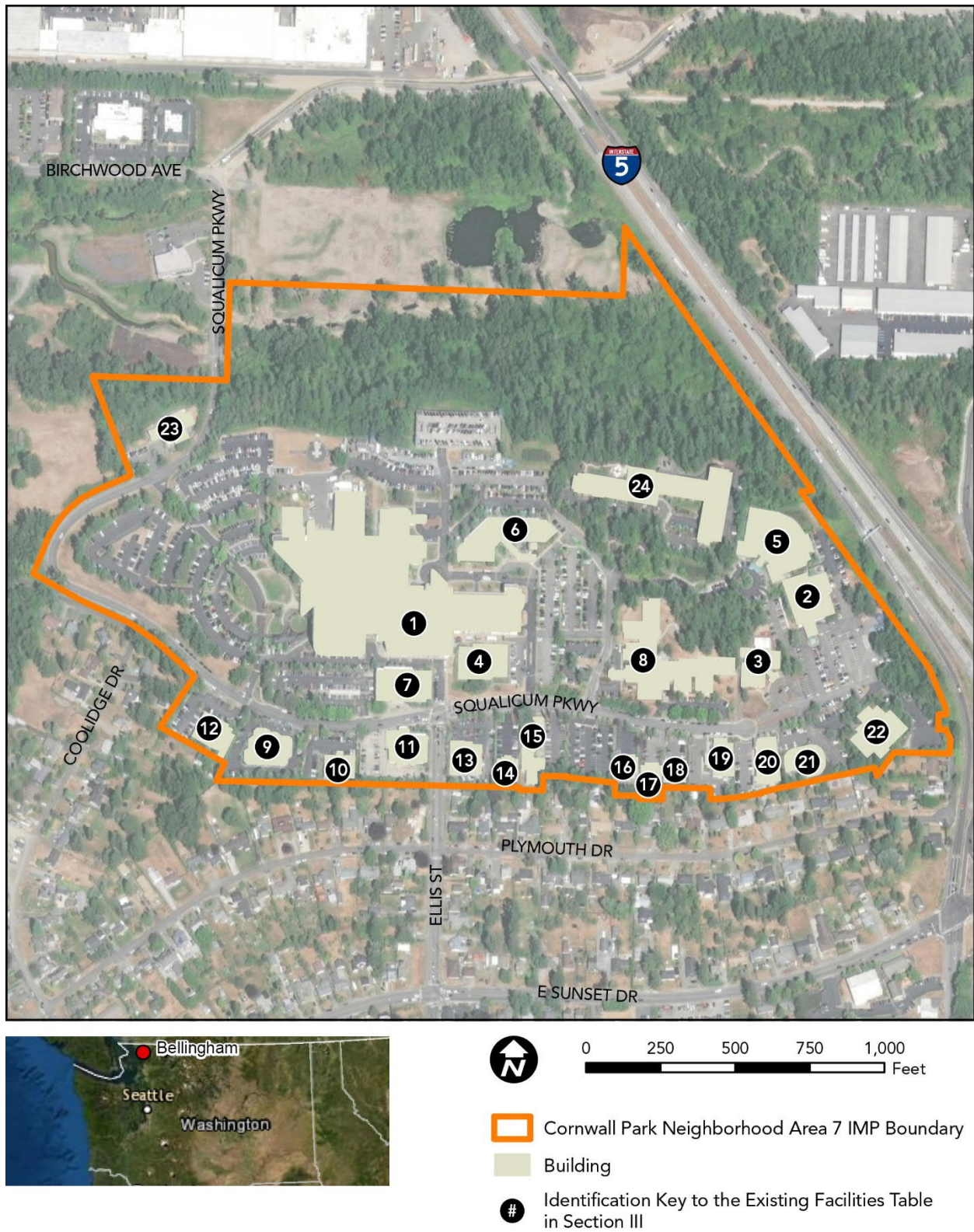


Figure 1. Institutional Master Plan Existing Property Map

A Land Use

The Institutional Zone is subdivided into three primary zones as illustrated in Figure 2. The general purpose of each zone is outlined below and further detailed in the Standards Section.

1. Zone 1: Medical Support – Purpose

Zone 1 consists of Medical Support uses south of Squalicum Parkway. This zone benefits from immediate proximity to the Medical Center while minimizing impact on the adjacent residential neighbors.

2. Zone 2: Hospital/Medical – Purpose

The developed area of the St. Joseph Medical Center campus comprises Zone 2, most of which lies more than 200 feet from adjacent residential areas to the south. The primary health care services associated with the Medical Center are located in this zone, including acute care, in-patient and long-term care clinics, outpatient diagnostic and treatment services as well as medical support uses.

3. Zone 3: Open Space – Purpose

The Open Space Zone is to be reserved for a natural area between the Medical Center campus and the Squalicum Creek restoration area (formerly Bug Lake). A perpetual easement was granted by St. Joseph Medical Center to the City of Bellingham in 2002 to permit conservation, public access and enhancement of the open space. The easement grants the City the rights to preserve, enhance and manage vegetation, water and fishery resources.

Land uses surrounding the Institutional Master Plan area are primarily residential, public or industrial as shown in Figure 3. “Sunset Square” and other commercial activities are located east of the site and Interstate-5. A separate and distinct “institutional” zone has been designated to the northwest of Area 7 for the purposes of multi-family residential development. This zone, Area 4 of the Cornwall Park Neighborhood Plan, is not included within the scope of this Institutional Master Plan.



Figure 2. Land Use Zones within the IMP Area

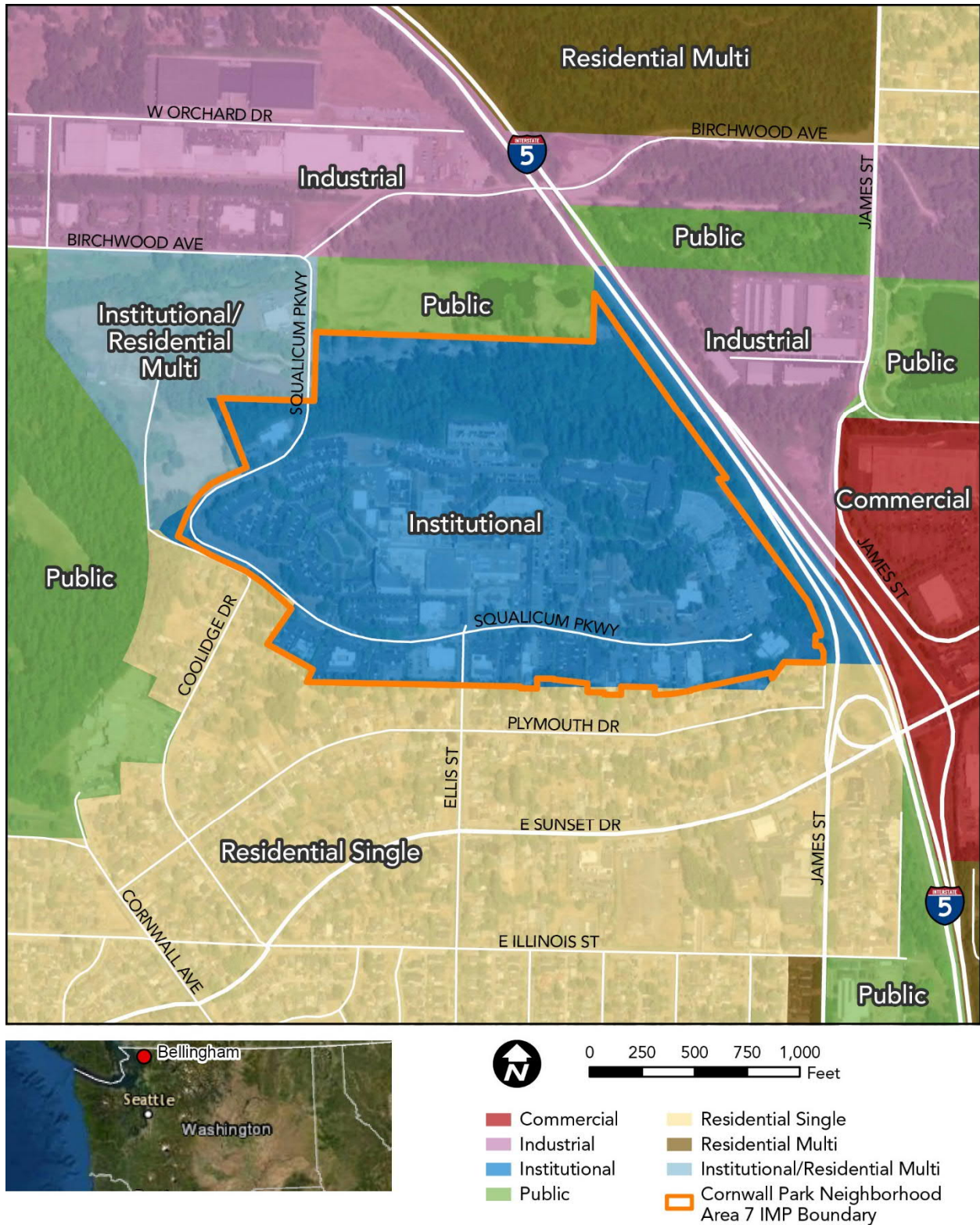


Figure 3. Land Use Zones Adjacent to IMP Area

B Vehicular Circulation

Results of an analysis of the projected traffic from the projects described herein determined that the existing circulation system was sufficient to handle increased traffic generated by the development of St. Joseph Medical Center through 2042. (See Section F for description of Phased Development projects.) Each project in the phased development schedule will require a transportation concurrency evaluation to determine if arterial street capacity is available to accommodate traffic impacts associated with the specific project at the time. Transportation impact fees (if any) will be assessed by the City on a per-project basis.

Vehicular circulation and access improvements to be installed with the West Pavilion and Phase 1 projects include the following:

- Reconfigured vehicular access in the west surface parking lot
- New covered drop-off lane with increased capacity and bypass lane
- New/enhanced bus stop location in coordination with Whatcom Transit

Possible future vehicular circulation and access improvements include the following:

- Squalicum Parkway Access Management: To improve safety with the potential increases in westbound vehicle queues at the Squalicum/Ellis traffic signal, upon completion of future phase development, conduct monitoring studies in coordination with City staff to evaluate the need for potential left-turn access restrictions on

Squalicum Parkway between Ellis Street and Levin Lane

PeaceHealth will make a pro rata contribution to Phase 1 of the Meridian/Birchwood Transportation Improvements, as listed on the City's 2024-2029 Transportation Improvement Program, consistent with the Transportation Impact Analysis in Appendix B.

The Campus internal circulation element of the IMP includes improved facilities for general vehicular traffic, emergency vehicles and transit, as well as pedestrians and bicycles, as described below.

1. General

Access to the SJMC Campus currently occurs from Squalicum Parkway at four points: (1) at the existing northwest driveway across from the Bellingham Childcare & Learning Center, (2) at the existing southwest driveway across from the Mt. Baker Imaging building, (3) at an existing driveway on the east side of the hospital adjacent to the Medical Arts Building (Bunker Building) and (4) at the existing southeast driveway adjacent to the St. Francis Convalescent Home. The existing internal drive aisles will be retained, with minor modifications to driveways and parking areas, and additional active transportation connections to accommodate future development needs. Figure 4 shows conceptual cross-sections. Any proposed modifications involving public rights-of-way would be included in development plans and subject to approval by the City's Public Works Department.

The existing West entry and drop-off area will be maintained with access from Squalicum

Parkway via the existing driveway (which also provides secondary ambulance access). The north drive aisle between the existing ground helipad and loading dock will be restricted to delivery, emergency, and medical staff vehicles for safety reasons, as shown in Figures 5 and 6.

The internal circulation improvements will be located to provide maximum flexibility for

Medical Center development. In addition, planning of the internal circulation improvements (for vehicles and bikes) and planning of pedestrian routes will be coordinated to minimize the number of vehicle and pedestrian intersections and maximize safety where roadways and pedestrian routes do cross.

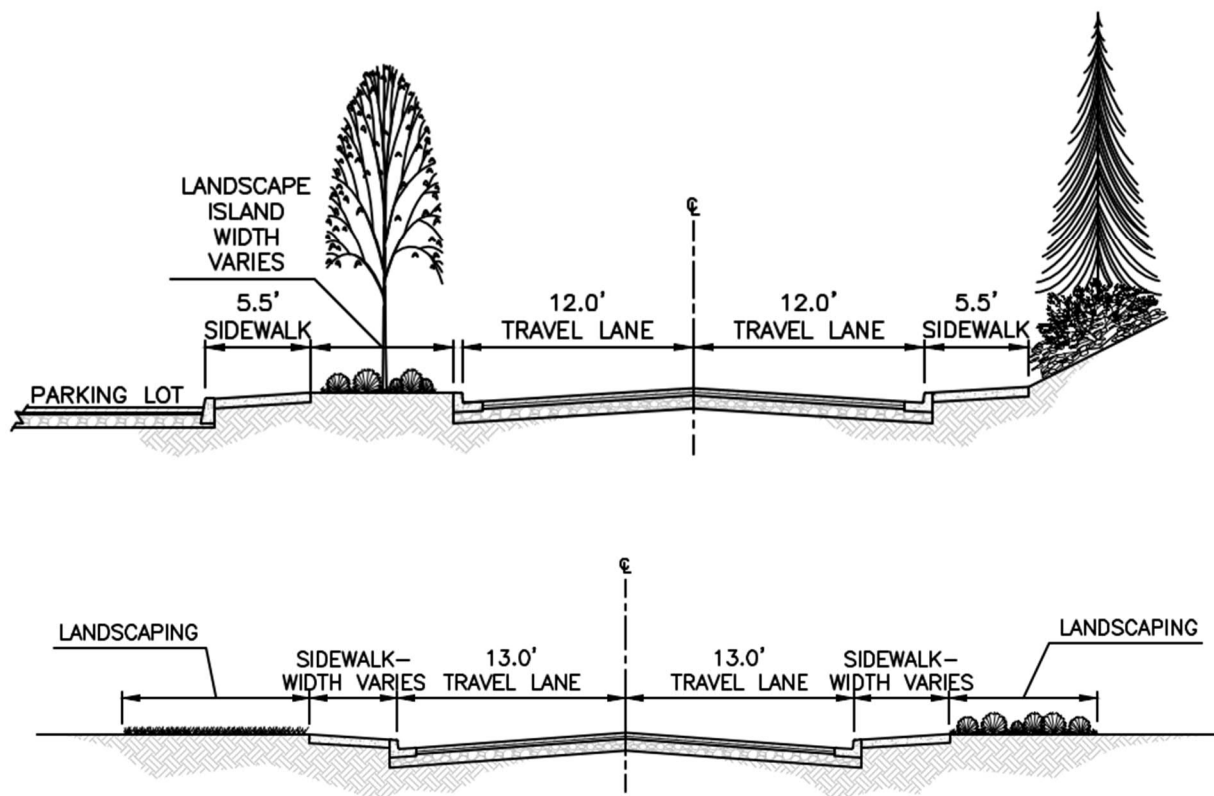


Figure 4. Conceptual Cross-Sections east of the East Parking Garage (top) and west of proposed West Pavilion (bottom)

2. Ambulance

Current emergency vehicle access to the Medical Center will be retained. The primary ambulance entry is located at Ellis Street and Squalicum Parkway with secondary ambulance

access at the existing driveway to the west. Short-term surface parking stalls for direct patient access to the Emergency Department will be available.

3. Transit

Transit service to the Institutional Master Plan area is provided by Whatcom Transit Authority (WTA). WTA provides fixed-route and demand-responsive service, with stops on Squalicum Parkway and on-Campus at the main Medical Center building, St. Francis and the Willows. Design of the internal circulation improvements and other planned development described in Subsection F will be coordinated with WTA staff to identify and incorporate transit-supportive features and facilities (bus stops, layover space, etc.).

4. Parking

St. Joseph Medical Center will continue to provide parking in a combination of surface lots and parking structures/decks, both stand alone and incorporated into the Medical Center building. A new parking garage providing a net increase of 404 parking stalls is currently under construction east of the Medical Center building and will be in use starting in 2023. Potential locations for new parking structures are illustrated in Figure 5. One new structure and a potential expansion of an existing parking structures are anticipated in order to meet the parking demand for the Medical Center campus through 2042. (See Subsection F for further description of planned parking structures.)

Existing surface parking areas will be reconfigured as necessary to accommodate new buildings.

Structured parking will be provided in new structures or through expansion of existing stand-alone structures and incorporated into the Medical Center building complex. Garages will be accessed from the internal circulation system. Pedestrian connections from the stand-alone garages to the Medical Center will be provided via sidewalks and raised crosswalks across the internal circulation network. Electric vehicle charging stations will be evaluated at existing and future parking areas in compliance with applicable City codes.

C Pedestrian/Bicycle Connectivity

Pedestrian and bicycle amenities will be built as part of the future short-term and longer-term development plans. In addition, sidewalks on Squalicum Parkway are not continuous and some improvements are necessary in order to create a safe walking environment within the IMP area. Figure 6 illustrates the conceptual plans for pedestrian and bicycle improvements. The north drive aisle between the existing ground helipad and loading dock will be restricted to delivery, emergency, and medical staff vehicles only for safety reasons, with pedestrian and bicycle access discouraged, as shown in Figures 5 and 6.

The following overview describes the pedestrian and bicycle amenities planned for Campus development.

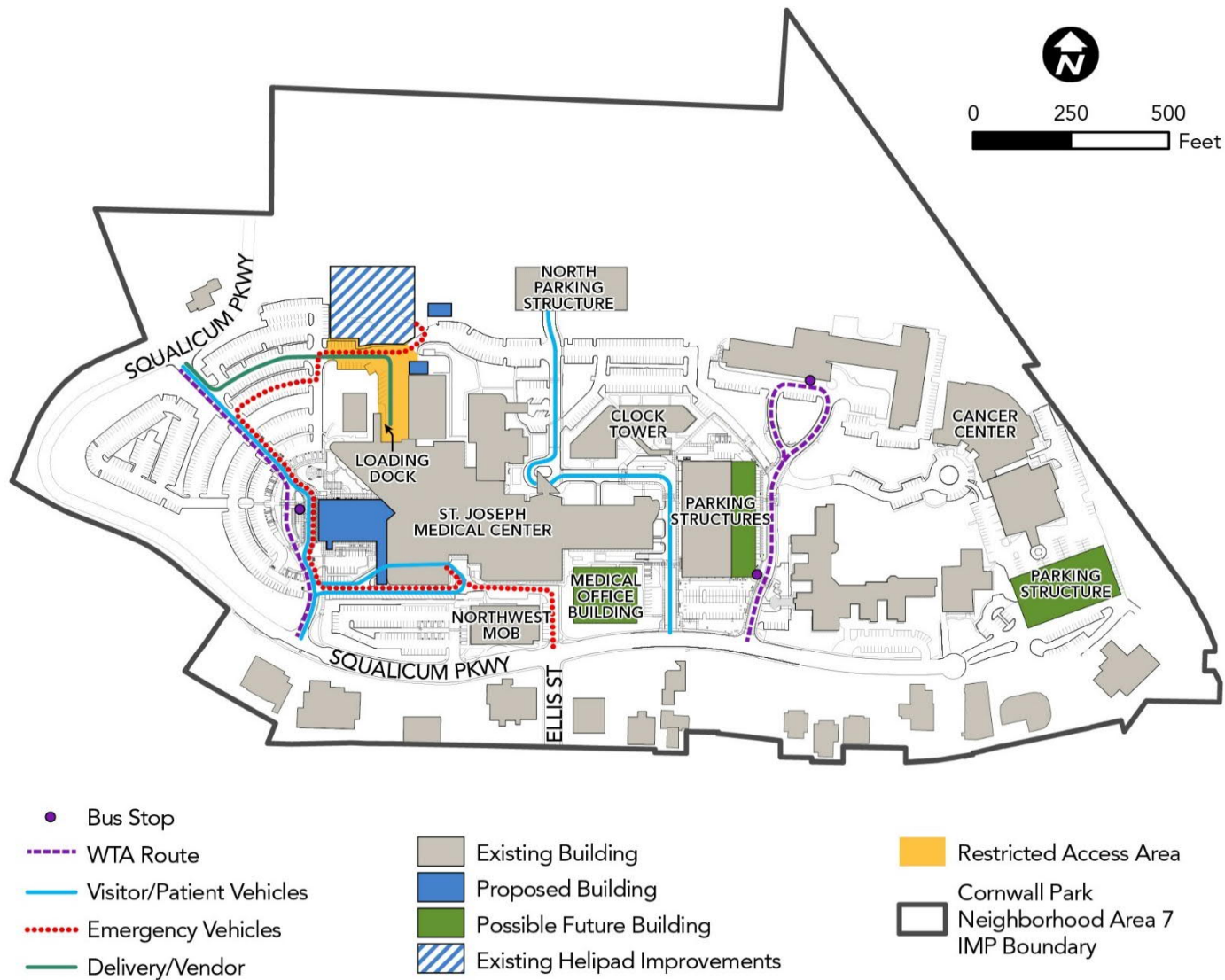


Figure 5 . Internal vehicular circulation

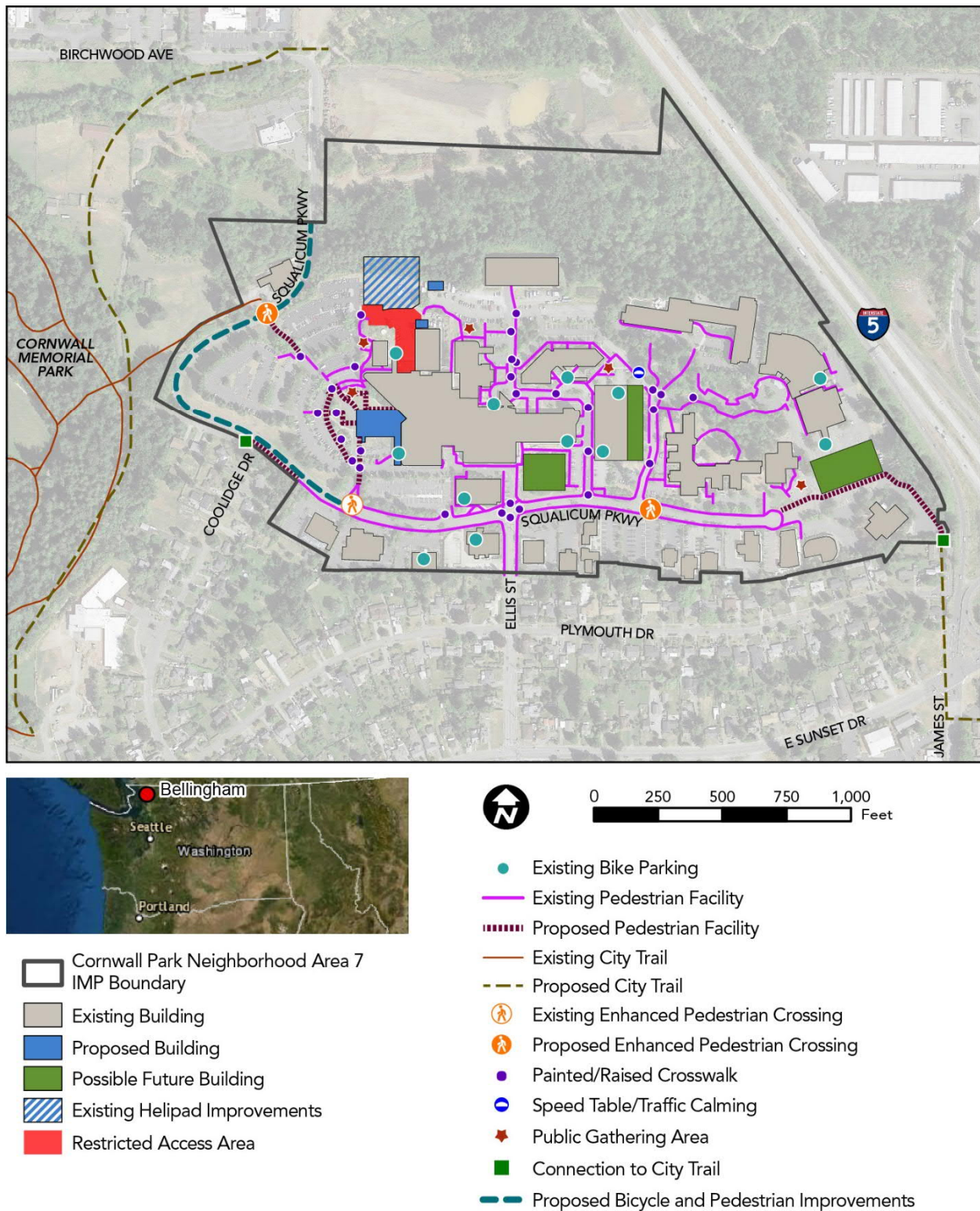


Figure 6. Pedestrian/Bicycle Connectivity

1. Pedestrian Amenities

Design and construction of planned development projects described in Subsection F will include sidewalks and lighting to promote easy and safe pedestrian movement around the Campus, particularly to/from the Medical Center and parking areas. Crossing opportunities will be carefully located and designed to concentrate crosswalk locations in key locations to promote safe walking and vehicular conditions throughout the Campus. Design features such as raised crosswalks, reflectors and/or signage will be considered to maximize the safety and visibility of pedestrians. New/enhanced pedestrian facilities (i.e., new sidewalks, raised crossings, new ADA curb ramps) will be constructed during Phase 1 as part of the site civil improvements for the West Pavilion (see Subsection F.1).

Landscaped areas around Campus buildings, entry points and transit stops will provide passive recreation opportunities. Benches and street furniture will be included to foster a comfortable walking environment.

Off-campus pedestrian connectivity will be promoted by adding limited amenities on or along Squalicum Parkway.

PeaceHealth and the City shall continue good faith discussions of PeaceHealth's proposal to construct an alternative bike and pedestrian route or routes through the hospital campus in lieu of constructing the $\frac{3}{4}$ street improvements to Squalicum Parkway. A similar alternative bike and pedestrian route may be constructed along the east side of Squalicum Parkway from the hospital's

northerly driveway access point to the southwest corner of the Open Space tract (zone three). The alternative may be approved by the City administratively, provided it achieves the same or similar level of bike and pedestrian connectivity, functionality and safety, and is located within a dedicated public access easement. PeaceHealth shall construct the approved alternative, if any, prior to completion of the West Pavilion during the First Phase of hospital development.

Extend curb, gutter, and sidewalk along the west side of Squalicum Parkway to provide a continuous sidewalk between Ellis Street and the Park trailhead at Coolidge Drive. Said improvements shall be completed prior to completion of any permitted project under the First Phase of hospital development.

Install an enhanced crossing to, and pedestrian landing at, the Daycare on the west side of Squalicum Parkway across from the northern entrance to the hospital and extend sidewalk within the hospital campus to connect with the new crossing. Such improvements shall be completed prior to completion of any permitted project specified under the First Phase of hospital development.

There shall be no vehicular access between Coolidge Drive and Squalicum Parkway.

In addition, a new marked crosswalk with flashing beacons is also proposed on Squalicum Parkway east of Ellis Street in the vicinity of the hospital east access driveway. The exact location will be determined at the time of permitting for a future development phase.

2. Bicycle Amenities

Design and construction of the internal circulation improvements will include bicycle wayfinding and shared lane markings as appropriate.

PeaceHealth and the City shall continue good faith discussions of PeaceHealth's proposal to construct an alternative bike and pedestrian route or routes through the hospital campus in lieu of constructing the $\frac{3}{4}$ street improvements to Squalicum Parkway. A similar alternative bike and pedestrian route may be constructed along the east side of Squalicum Parkway from the hospital's northerly driveway access point to the southwest corner of the Open Space tract (zone three). The alternative may be approved by the City administratively, provided it achieves the same or similar level of bike and pedestrian connectivity, functionality and safety, and is located within a dedicated public access easement. PeaceHealth shall construct the approved alternative, if any, prior to completion of the West Pavilion during the First Phase of hospital development.

Bicycle storage areas are currently located throughout the Campus near multiple building entries. As the Medical Center expands, new or relocated bicycle storage areas will be provided to promote easy access for cyclists. Installation of electric bicycle charging stations will be evaluated. A central bicycle storage area in the stand-alone parking structures will also be considered to provide staff covered and secure bicycle parking options.

D Helicopter Circulation

Emergency access to/from the Medical Center via helicopter will continue according to existing approvals. A new rooftop helipad is planned as part of the West Pavilion development for patient pick-ups and drop-offs, as described in Subsection F, and will be subject to environmental analysis and approval from the City of Bellingham. The City may apply appropriate mitigation measures after the environmental analysis takes place. The existing ground helipad on the north side of campus will remain in use for parking, refueling, maintenance, and training for medical, military, and U.S. Coast Guard helicopters.

Future operating procedures for medical helicopters will include start-up from the existing ground-level helipad, flight to patient, return flight to the new rooftop helipad on the West Pavilion for patient offload, liftoff from the rooftop, and landing at existing ground-level helipad. Helicopters traveling to and from the Campus will be subject to the Helipad Operating Guidelines outlined in Appendix C. Should relocation of the existing or proposed helipads prove necessary and/or desirable to improve Medical Center operations, the proposed site would be within the Hospital/Medical Zone 2. Any change of the existing or proposed locations may require environmental analysis and planned development approval from the City of Bellingham.

E Utilities

Presently, the IMP site is adequately served by public and private utilities. The planned development outlined in Subsection F, Phased

Development Schedule, will require campus expansion of the existing utilities to service the proposed buildings. The following is a brief description of the impacts that IMP projects proposed for St. Joseph Medical Center have on major utility systems (see Figure 7. Each project will require City of Bellingham planned development approval which includes a "Certificate of Concurrency for Transportation Facilities."

1. Water

The existing Medical Center campus has an extensive water system that combines both potable water and fire protection water supply in a looped system throughout the site. The looped water mains enable both potable and fire protection water delivery to the buildings through alternate routes, adding redundancy and increased flow efficiency to the system. Proposed facilities outlined in the IMP will utilize the existing infrastructure with minimal additions of new water mains to the existing Campus system.

Area 7, the IMP Area, is at a higher elevation with respect to the City's water pressure zone that supplies the Medical Center and other IMP buildings. Water pressure to the Campus is at the low end of the acceptable range. Buildings over two to three stories in height typically require booster pumps to meet the water pressure demands of the upper floors. The larger, existing Medical Center buildings include sprinkler systems with booster pumps due to this circumstance. Future buildings and/or expansion of existing structures should continue this practice.

2. Sanitary Sewer

Sanitary sewer discharges from the Campus are routed south to the City-owned sewer main that runs along Squalicum Parkway. The main size varies from eight-inch diameter at the east end and increases in diameter to 12 inches at the west end of the zone. The present main appears to be adequately sized to convey the existing discharges and the additional flows associated with IMP improvements.

3. Stormwater

The City of Bellingham and the Washington State Department of Ecology regulate stormwater runoff associated with new development. These regulations address both water quality and quantity stormwater discharges from the developed areas with the main focus on impervious area. Stormwater treatment and detention issues on Campus will continue to be addressed individually for each new project.

The regulatory agencies have different requirements for re-development and new projects. Building expansions over existing impervious areas, such as asphalt parking areas or buildings to be demolished, will need to be reviewed on a case by case basis based on the agency regulations in place at the time the improvements will be made.

New structures to be constructed over existing vegetated or pervious areas will require more extensive stormwater improvements. The proposed parking structures will require their own water quality and detention facilities, to be sized

according to the specifics of the final building design and locational topographic conditions.

4. Natural Gas

Natural gas service is provided to the site by Cascade Natural Gas. Main lines, at 60 psi pressure, are located in Squalicum Parkway and Ellis Street. The campus buildings to the east of Ellis Street are serviced by a two-inch diameter line that crosses under I-5 and continues west along Squalicum Parkway to the Medical Arts Building. The Medical Center complex is serviced from the north and the south. A two inch diameter main enters the site from the south on Ellis Street. The main crosses Squalicum Parkway, continues north about 150', and stops just east of Building #21 Northwest Medical Center. (The main used to continue north but that portion was retired with the last Medical Center expansion.)

A four inch diameter main enters the site from the north on Squalicum Parkway, across from the Bellingham Childcare & Learning Center. The four inch main continues east approximately 250 feet where it is reduced to two inch diameter. The two inch line continues east along the service road north of the main buildings and turns south along the east side of the Medical Center.

Based on discussions with Cascade personnel, there is sufficient capacity in the existing system to handle the anticipated future growth. Meter sizes and their location on future buildings will need to be addressed during each building's final design and permit review. The Cascade system, which ends at each meter, does not have an automatic shut off valve that will close in the event of a

catastrophic failure (such as an earthquake). The Medical Center can get an earthquake valve, located behind the Cascade meter, if this is a concern.

5. Electrical

The proposed development is consistent with Puget Sound Energy's system. Puget Sound Energy has plans to continually expand its substation system and the IMP proposed plan fits with its proposed improvements. The Medical Center is primarily fed through the Plymouth substation, located south of the Medical Center, which also supplies Bellingham Cold Storage. Squalicum Parkway is fed through underground power lines.

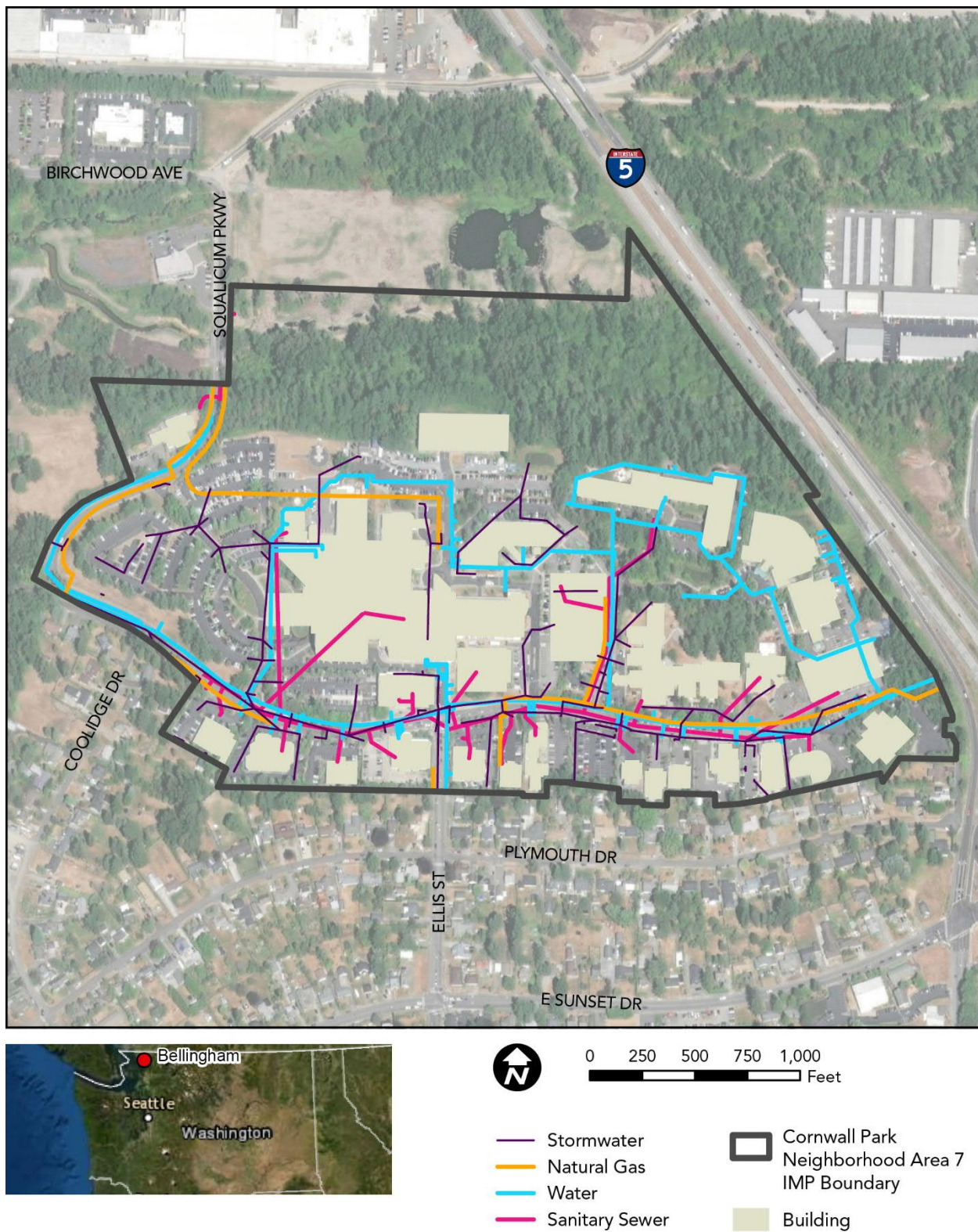


Figure 7. Utility Plan

F Phased Development Schedule

Several development projects are anticipated to be needed to meet the regional healthcare needs. The following project descriptions provide an approximate chronological overview of the significant major development (building and/or circulation) projects conceptually identified for St. Joseph Medical Center. In addition, smaller, unforeseen renovation projects may prove necessary to respond to Medical Center needs. Figure 8 illustrates the anticipated expansion of the Medical Center Campus.

Phase 1

See Section III.C and IV.H for a description of street improvements to be implemented in this phase.

1. West Pavilion

A new six-level, 120,000-square-feet (SF) addition to the west side of the Medical Center building features a rooftop helipad; a new main entrance and lobby; and expansion and upgrade to the emergency department, critical care, and birth and delivery services. Site civil improvements include a new patient drop-off area, reconfigured parking areas, new/enhanced pedestrian facilities, and a new bus stop location. Construction is expected to begin in 2024.

2. Remodel of North and South Patient Pavilions

As Medical Center operations are transitioned into the new West Pavilion, the existing facilities would be remodeled to expand the emergency

room capacity and to add new, updated bed space and nurse station areas. Construction is anticipated to occur concurrently with and after completion of the West Pavilion project.

3. Central Utility Plant Addition

The Central Utility Plant (CUP) is the hub of the mechanical, electrical, and plumbing systems for the campus. To accommodate the new West Pavilion operations, an approximately 1,000-SF expansion of the existing CUP is anticipated. Construction is expected to occur in 2023.

4. Airlift Northwest Bellingham Base and Ground Helipad Improvements

A new approximately 1,800 SF modular building just east of the existing ground helipad is proposed to provide office, training and rest space for Airlift Northwest flight crews. This building would replace the existing trailer used for office and rest space. The existing ground helipad would receive improvements to comply with current Federal Aviation Administration regulations.

Future Potential Projects

5. Internal Remodel of Existing Unit

The vacated Childbirth Center would potentially be remodeled into additional medical-surgical units.

6. New Medical Office Building

A new three-story Medical Office Building could be built to replace the building at 3001 Squaticum Parkway (known as the Bunker Building). Medical offices from the Bunker

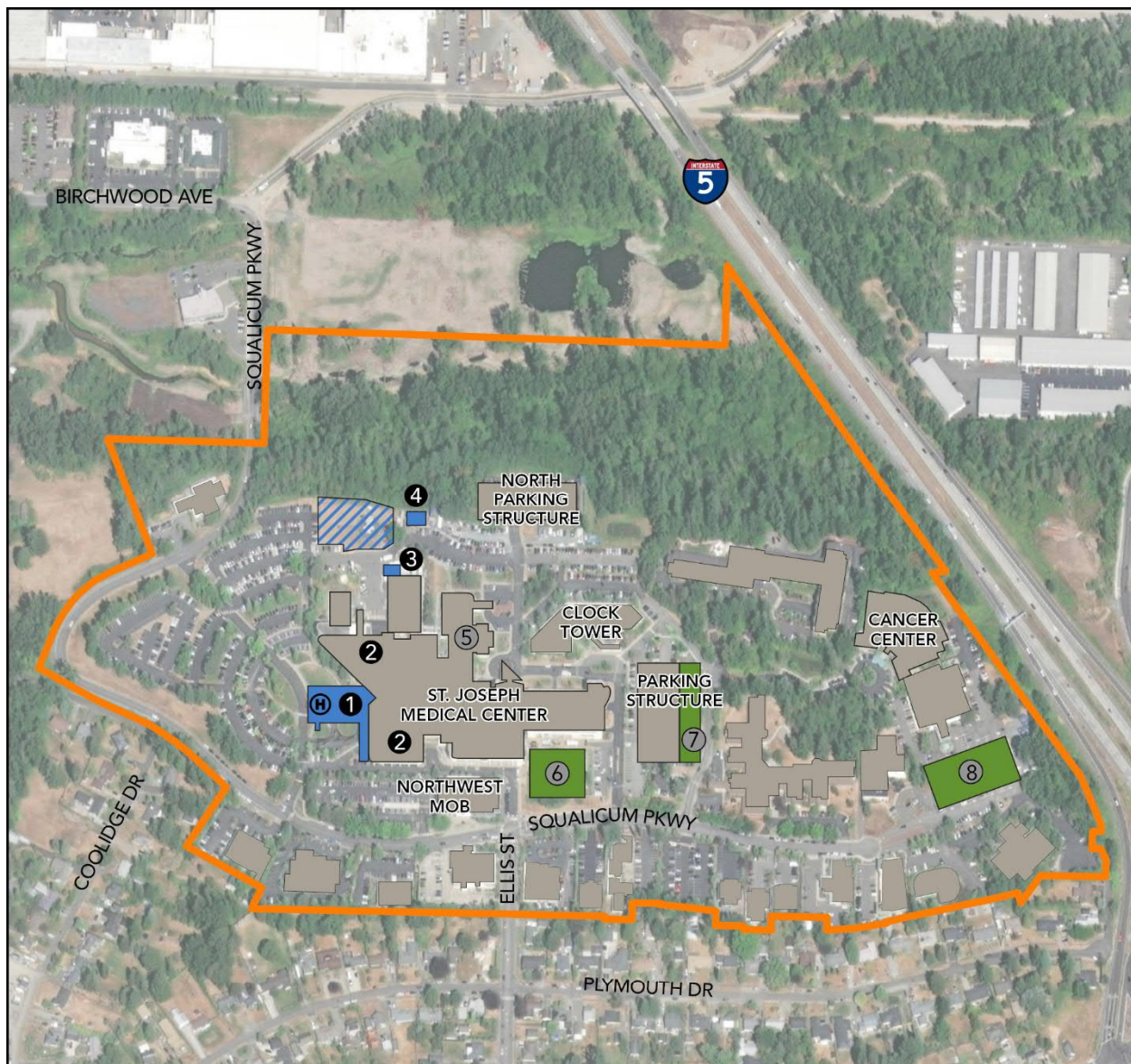
Building would be relocated to the New Medical Office Building upon completion. Once vacated, the Bunker Building would be demolished. The building is anticipated as an approximately 45,000 SF addition to the Medical Center, adjacent to the east side of the existing East Tower and would provide internal connections to the main Medical Center building. Additional parking is anticipated to be required, which may be accommodated through an expansion of an existing parking garage or construction of a new parking garage. At this time, the number of stalls to be added has not been clearly identified. A preliminary conservative (low) estimate of net new stalls added would be approximately 200 new parking stalls.

7 & 8. New and/or Expanded Parking Structures

An expansion to the Main Parking Garage and/or a new parking structure on the east side of campus may be constructed to accommodate future growth in medical buildings and would be ADA accessible.

Additions/Modifications of Existing Buildings

The interior remodel of existing buildings or the addition of up to ten percent (10%) of overall existing square footage to an existing building do not require planned development approval but said construction shall be required to comply with all other applicable building and fire code requirements.



0 250 500 750 1,000 Feet

- Cornwall Park Neighborhood Area 7 IMP Boundary
- Existing Building
- Proposed Building
- Possible Future Building
- Existing Helipad Improvements

- ① West Pavilion: 6-floor Addition with Rooftop Helipad
- ② Remodel of North and South Patient Pavilions including Emergency Department and Nursing Units
- ③ Central Utility Plant Addition
- ④ ALNW Building
- ⑤ Internal Remodel of Existing Unit
- ⑥ New Medical Office Building
- ⑦ Parking Structure Extension
- ⑧ Parking Structure

Figure 8. St. Joseph Medical Center Proposed Major Development Projects

G Open Space

The majority of the Institutional Zone is currently developed in built facilities and/or associated parking. Open space for active or passive use is provided immediately around most existing facilities, in the eastern portions of Zone 2 and to the north, in Zone 3. St. Joseph Medical Center granted a perpetual easement (AF#2020400010) to the City of Bellingham allowing for conservation, enhancement and public access to Zone 3. Figure 9 illustrates the open space areas within the IMP area.

1. Open Space Requirements

At least 20% of the Institutional Master Plan area must be maintained as open space. The open space areas shall include, but not be limited to, land left in the natural state, landscaping,

landscaping associated with streets and sidewalks, gardens, parks and outdoor exercise facilities. All non- Medical Center applicants shall be required to set aside 20% on-site as part of the required development plans unless the City administratively approves a lesser amount in accordance with their adopted policies. St. Joseph Medical Center's open space requirements for further development are satisfied by the open space preserved in Area 3.

2. Opportunities in Landscaped Areas

PeaceHealth will evaluate opportunities for growing fruits and vegetables in viable landscaped areas on the Medical Center campus. These efforts will be undertaken in partnership with organizations that can provide assistance and/or resources to implement these opportunities.

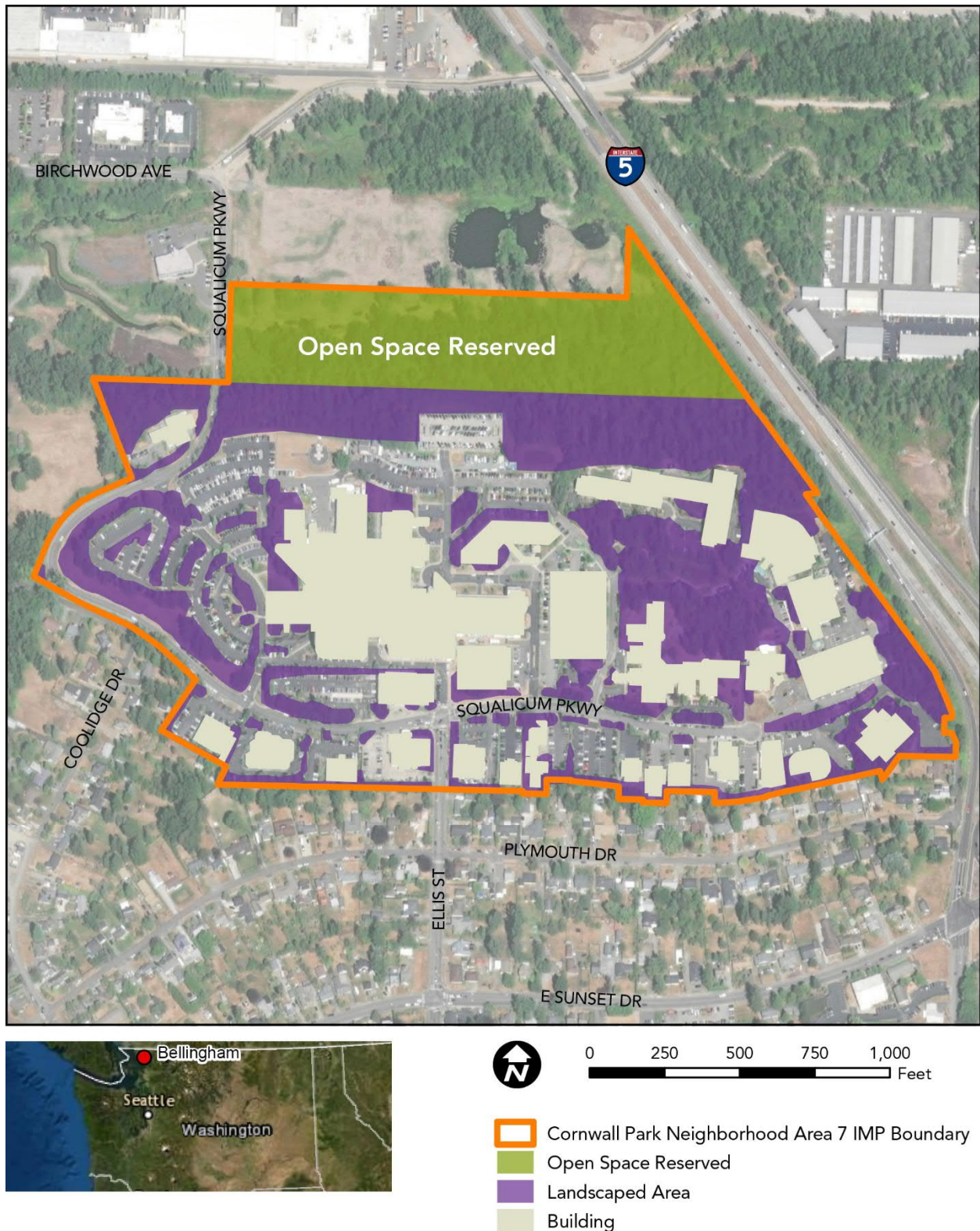


Figure 9. Open Space Plan

IV. STANDARDS

A Permitted Uses

Area 7 is subdivided into three primary zones of (existing) land use and intent, as illustrated previously in Figure 2. Zone 1 consists of Medical Support uses that benefit from immediate proximity to the Medical Center while having minimal impact on the adjacent residential neighbors. The Medical Center campus and related medical uses comprise Zone 2, most of which lies more than 200' from adjacent residential areas. Zone 3 consists of natural open space area between the Campus and the Squalicum Creek restoration area (formerly Bug Lake) that was made open to the public via a perpetual easement granted to the City of Bellingham in 2002.

The uses specified are intended to encompass health care needs within the Bellingham and greater Whatcom County communities and be regarded as flexible in their interpretation to adapt to new medical/dental technologies and practices as they are developed. Ancillary uses such as health care related retail, educational facilities and associated parking are intended to support the primary, medical/dental uses of the Institutional Zone. Permitted Uses within each zone are defined in the following text.

1. Zone 1: Medical Support – Principal Uses
 - a. Medical clinics, offices
 - b. Dental clinics, offices

- c. Health care related retail, including food and beverage service as an ancillary use
 - d. Any permitted and/or conditional uses allowed in a Residential Single Zone.
2. Zone 2: Hospital/Medical – Principal Uses
 - a. Medical Center and all primary health care (acute in-patient, long-term clients, outpatient diagnostic and treatment services)
 - b. Medical and dental clinics, offices
 - c. Health care related retail
 - d. Day care facilities
 - e. Health care related residential uses
 - f. Service care, day treatment and child placing agencies
 - g. Public utilities, exclusive of storage yards
 - h. Public buildings and uses
 - i. Food and beverage service as an ancillary use
 - j. Private clubs and lodges
 - k. Neighborhood clubs and activity centers
 - l. Branch post office and banking facilities (excluding drive through service) within medical care facilities
 - m. Personal service facilities within medical care facilities
 - n. Laundry and dry cleaning establishments within medical care facilities
 - o. Florist shops within medical care facilities

- p. Health, fitness and recreational clubs
- q. Educational/Seminar facilities
- r. Parking facilities
- s. Helicopter pad and accessory uses
- t. Wireless communication facilities
- u. All other uses allowed in the Residential Single Zone.

3. Zone 3: Open Space – Principal

- a. Natural and/or landscaped open space.

Similar uses as listed in Zones 1 through Zones 3 may be permitted upon Planning Director approval.

B Building Height Limitations

- 1. No structure shall exceed 35' under definition (1) when within 200' of the site plan boundary, which lies adjacent to a Residential Single general use type.
- 2. Except for the limitation above, there is no expressed general height standard in the Institutional Zone.

C Site Coverage Limitation

- 1. There is an 80% coverage limitation for planned projects within the Institutional Zone.

D Open Space Requirements

At least 20% of the Institutional Master Plan area must be maintained as open space. The open space areas shall include, but not be limited to, land left in the natural state, landscaping, landscaping associated with streets and sidewalks, gardens, parks and outdoor exercise facilities. All applicants shall be required to set aside 20% on-

site as part of the required development plans unless the City administratively approves a lesser amount in accordance with their adopted policies.

E Setback Requirements

1. Front Yard Setback

- a. None required unless vision clearance is necessary for traffic safety.

2. Side Yard Setback

- a. A side yard setback of 10' is required for sites abutting a flanking street. The setback is to be measured from the adjacent right-of-way to the structure's foundation.
- b. Except for the condition above, a side yard setback of 5' from the property line to the foundation of the structure is required.

3. Rear Yard Setback

- a. A rear yard setback of 25' is required for properties within Zone 1. The setback is to be measured from the structure's foundation to the adjacent property line. Eaves may penetrate over the yard area; however no projection may extend more than 5' into the yard.
- b. Except for the condition above, a rear yard setback of 10' is required.

4. Internal Setback

- a. The internal setback between buildings located within Zone 2 may be less than 5' upon administrative approval where the two properties are in common ownership. A setback less than 5' may require structural modifications in order to achieve compliance with Uniform Fire and Building Code requirements.

5. Critical Area Buffers

- a. Critical area buffers and building setbacks will be in accordance with City of Bellingham regulations and determined for each new project.

F Landscape Requirements

1. General Provisions

- a. This section provides the landscaping requirements for all uses permitted within the Institutional zone district.
- b. Prior to issuance of a building permit, a scaled landscape site plan shall be submitted and approved by the Planning Department consistent with the provisions herein. Said plan shall specify species name, size and location.
- c. Landscaping pursuant to the approved site plan shall either be installed or bonded for (in an amount no less than 150% of cost of material and installation) prior to issuance of a certificate of occupancy or, if no certificate is required, prior to final inspection approval.
- d. A maintenance contract with a reputable landscape firm shall be required. The contract shall also be for 2 years and be filed with the City Clerk.
- e. Those existing trees that will be saved, if they meet the minimum specification herein specified, shall count toward meeting the requirements herein, provided they are of an acceptable species.

2. Requirements

a. Street Trees

One street tree shall be required for every 25 feet of street frontage abutting the property. Said trees shall be installed adjacent to the right-of-way within the property lines or within the right-of-

way subject to the approval of the Public Works and Parks Department.

b. Freeway Trees

One tree for every 25 feet of freeway frontage shall be installed along that frontage. This provision applies only where trees do not already exist on property adjacent to the freeway. It also applies only adjacent to new development which is occurring adjacent to the freeway.

c. Parking

- (i) For every 5 surface parking spaces, 1 tree shall be planted around the facility perimeter. These trees may be grouped or spread linearly.
- (ii) Parking space separation areas as required shall be landscaped.
- (iii) Areas between the parking facility and adjacent property shall be landscaped if the adjacent property is of the same general use type. If the adjacent property is of a Residential General use type, said area shall be screened.

d. Yards

- (i) Yards adjacent to Residential Single use areas shall be landscaped with a screen and a 6 foot high landscaped berm or fence, wall of trees, or a similarly effective buffer as approved by the Planning Director.

3. Standards

a. Street/Freeway Frontage Trees

- (i) Species: Street or freeway frontage trees shall be of a species recommended in the
- (ii) Bellingham Street Tree Plan and approved by the Parks Department.

(iii) Size: Street or freeway frontage trees shall be no less than 10' in height at time of installation with a minimum caliper size of 2½" measured 1' above grade.

(iv) Spacing and Location: Street or freeway frontage trees shall be spaced and installed as recommended in the Bellingham Street Tree Plan subject to approval of Public Works and Parks Department.

b. Other Required Trees

(i) Species: Other required trees shall be native to the area or recognized as being easily adaptable to the climate.

(ii) Size: Other required trees shall be no less than 6' in height at time of installation with a minimum caliper size of 1" measured 1' above grade.

(iii) Spacing and Location: Other required trees may be installed where desired by applicant within the general constraints of this section.

G Parking & Loading Requirements

1. General Provisions

a. General Provisions, Design Provisions and Improvement Standards for off-street parking shall conform to those described in City of Bellingham Municipal Code 20.12.010. Loading Design Standards shall conform to those described in City of Bellingham Municipal Code 20.12.020.

b. Joint use parking may be permitted on a case-by-case basis by the Planning Director.

c. A minimum of one parking space and not less than one additional parking space for every 30 required spaces shall be sized and marked as

accessible. (Subject to all City of Bellingham standards.)

2. Minimum Number of Parking Spaces Required

The following parking space requirements are minimum standards and apply to all future development projects subsequent to the adoption of the IMP and do not apply to previously approved projects. Current City parking space requirements shall be followed for any land uses not listed below.

a. Hospitals: 1 per every 2 patient beds

b. Medical Care Centers: 1 for every 4 beds

c. Medical/Dental Offices, Associated Labs: 5 per 1,000 gross floor area

d. Boarding House, Hotel: 1 for every 2 bedrooms

e. General Business, Personal Service: 1 for every 250 assignable square feet of building area (ASF) open to the public

f. Private Clubs: 1 for every 150 ASF of assembly area; 1 space for each 125 ASF of eating/drinking facilities

g. Neighborhood Club, Activity Center: 1 for every 150 ASF

3. Number of Loading Berths Required

Any building intended to be used for retail, warehouse, freight or hospital uses shall be provided with off-street loading berths according to the following schedule:

a. 1 berth for each building containing 10,000 to 25,000 ASF

b. 2 berths for each building containing 25,000+ ASF

Buildings containing 20,000 to 50,000 ASF of other uses shall be provided with 1 off-street loading berth.

H Street Standards

There shall be no vehicular access between Coolidge Drive and Squalicum Parkway. See Section III.B, III.C, and III.F for a description of street improvements to be implemented with phased development.

Install $\frac{3}{4}$ street improvements (bike lane, curb, gutter, and sidewalk) along the east side of Squalicum Parkway from the hospital's south entrance to the southwest corner of the Open Space tract (Zone Three). Said improvements shall be completed prior to completion of the West Pavilion during the First Phase of hospital development.

PeaceHealth and the City shall continue good faith discussions of PeaceHealth's proposal to construct an alternative bike and pedestrian route or routes through the hospital campus in lieu of constructing the $\frac{3}{4}$ street improvements to Squalicum Parkway. A similar alternative bike and pedestrian route may be constructed along the east side of Squalicum Parkway from the hospital's northerly driveway access point to the southwest corner of the Open Space tract (zone three). The alternative may be approved by the City administratively, provided it achieves the same or similar level of bike and pedestrian connectivity, functionality and safety, and is located within a dedicated public access easement. PeaceHealth shall construct the approved alternative, if any,

prior to completion of the West Pavilion during the First Phase of hospital development.

I Signage Standards

1. All signage must be an integral coordinated part of a sign design plan for the entire complex.
2. Roof signs are prohibited.
3. No signs shall be visible from Interstate 5.
4. No lighted signs shall be directly visible from Residential Use areas.
5. No signs shall be located in vision clearance triangles.

J Lighting Standards

Lighting plans must be included in all development applications involving major building and/or circulation improvements and will be approved on a project by project basis. Plans must include the following elements for consideration:

1. A photometric site plan, drawn to scale, showing proposed buildings and/or parking, mounting and pole height and including all proposed exterior lighting fixtures and footcandle spread.
2. Design specifications for all proposed lighting fixtures to include photometric data, cutoff fixtures, bulb wattage/type, and other descriptive information.
3. Outside parking lot lighting shall not be less than 0.5 footcandles per IES minimum lighting standards at the property line and shall be designed to minimize glare and spillover into adjacent properties.

4. Wall packs on buildings may be used at entrances to a building to light unsafe areas. Wall packs are not intended to draw attention to the building or provide general building or site lighting. Wall packs must be fully shielded to direct the light downward with maximum bulb wattage limited to 100 watts.
5. Building and aesthetic lighting must be shielded to prevent direct glare and/or light trespass in excess of 0.5 footcandles. The lighting must also be, as much as physically possible, contained to the site area.

K Accessible Access

In addition to requirements in the Building Code and parking standards for accessible access, development within the Institutional zone district shall meet the following standards:

1. There shall be paved ramps from parking areas to walkways, easily accessible to accessible parking spots and constructed to accommodate wheelchairs.
2. Paths and walkways shall be constructed to widths and with materials which will accommodate accessibility.

L Modifications

Building requirements set forth in this plan, except for the 25 foot rear yard setback in Zone 1 (abutting the single family zone) and the 35 foot height limit when within 200 feet of a residential single zone, may be reduced by approval of the Planning Director upon a finding that there are valid reasons to reduce the standard and there is minimal harm to the public.

M Cultural Resources

There are no known buildings, structures, or sites located on or near the IMP site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers. There are no known landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or within 0.25 miles of the IMP site. However, the Washington Department of Archaeology and Historic Preservation's (DAHP) Statewide Predictive Model identifies the eastern portion of the SJMC campus, including the existing main hospital building, as a "moderate risk" probability for discovery of archaeological resources

If archaeological materials are encountered during construction, an archaeologist would immediately be notified, and work halted in the vicinity of the find until the materials can be inspected and assessed in regard to using the National Register of Historic Places criteria. In the event of inadvertently discovered human remains or indeterminate bones, work must stop immediately. Any remains should be covered and secured against further disturbance and communication established with proper law enforcement with jurisdiction, the State Archaeologist or State Historic Preservation Officer (SHPO), and any consulting Tribes. Inadvertent discovery plans shall be prepared and kept on individual project sites for all future projects that include ground disturbance.

V. APPENDICES

A Appendix A

Public Meeting Notices

B Appendix B

Environmental Checklist, 2022

Attachments to Appendix B

- A. Geotechnical Engineering Report, PeaceHealth St. Joseph Medical Center West Tower, Aspect Consulting, LLC, 2021
- B. Transportation Impact Analysis, TENW, 2022
- C. Community Noise Study Report, WSP, 2022
- D. Cultural Resource Desktop Review of the PeaceHealth St. Joseph Medical Center Institutional Master Plan Amendment, Bellingham Washington; Drayton Archaeology, 2022
- E. Preliminary Third-Party Review of Community Noise Report, AECOM, 2023
- F. St. Joseph Medical Center Noise Control Considerations, AECOM, 2023
- G. Revised Community Noise Study Report, WSP, 2023

C Appendix C

Helipad Operating Guidelines

YOU'RE INVITED TO JOIN

St. Joseph Medical Center leadership for a virtual neighborhood meeting to learn more about a planned amendment to the Institutional Master Plan for the hospital campus.



Scan QR code to join
the Zoom meeting



Wednesday, April 20th, 2022



5:30pm – 6:30pm



Join Zoom Meeting

<https://peacehealth.zoom.us/j/89861071869?pwd=UmJYOGF4RnQ1eENFdHhMNXNWSHNndz09>



Or you may join by phone

1-888-788-0099
Meeting ID: 898 6107 1869
Passcode: 49503962

ABOUT THE INSTITUTIONAL MASTER PLAN AMENDMENT

St. Joseph Medical Center is working with the City of Bellingham to amend elements related to the hospital campus in the Institutional Master Plan (IMP) for the Cornwall Park area. The IMP, a long-term plan for future development, was first approved in 1983 and last updated in 2006.

The proposed scope of the 2022 IMP amendment includes:

- The same general vision, goals, boundaries, land uses, and standards as the 2006 IMP.
- Refinements to the 2006 phased development plans, with a mix of new construction and remodeling of existing St. Joseph Medical Center spaces to meet current and future community needs.
- Near-term projects such as the six-level West Pavilion addition, remodel of North and South Patient Pavilions, Central Utility Plant addition, and transportation improvements.
- Potential long-term projects such as a new three-level medical office building, and new and expanded parking facilities.



Design visualization of proposed West Pavilion addition

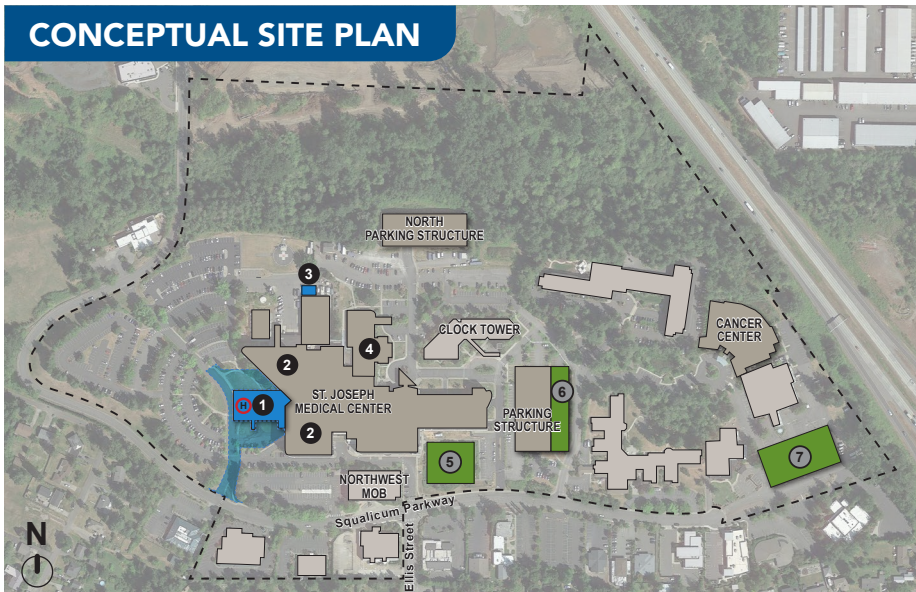
Questions? Contact

Karin Johnson at

KJohnson8@peacehealth.org



CONCEPTUAL SITE PLAN



LEGEND

EXISTING BUILDING

PROPOSED BUILDING

POSSIBLE FUTURE BUILDING

1 WEST PAVILION: 6-FLOOR ADDITION WITH ROOFTOP HELIPAD

2 REMODEL OF NORTH AND SOUTH PATIENT PAVILIONS INCLUDING EMERGENCY DEPARTMENT AND NURSING UNITS

3 CENTRAL UTILITY PLANT ADDITION

4 REMODEL OF CHILD BIRTH CENTER TO MEDICAL-SURGICAL UNIT

5 NEW MEDICAL OFFICE BUILDING

6 PARKING STRUCTURE EXTENSION

7 PARKING STRUCTURE

-- PEACEHEALTH OWNED/OCCUPIED PROPERTY

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

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

Instructions for applicants:

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

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

Instructions for Lead Agencies:

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

Use of checklist for nonproject proposals:

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

A. Background [\[HELP\]](#)

1. Name of proposed project, if applicable:

Cornwall Park Neighborhood Area 7 Updated Institutional Master Plan (IMP) Amendment and St. Joseph Medical Center (SJMC) West Pavilion

2. Name of applicant:

Dan Liggett

3. Address and phone number of applicant and contact person:

2901 Squalicum Parkway
Bellingham, WA 98225
949-610-4620

4. Date checklist prepared:

June 2022 (revised December 2022)

5. Agency requesting checklist:

City of Bellingham

6. Proposed timing or schedule (including phasing, if applicable):

The IMP Amendment proposal is anticipated to be considered by the Bellingham Planning Commission and City Council in the second half of 2022. The IMP Amendment proposal outlines a phased approach to development within the SJMC portion of the IMP area (see response to Question 11 below for a description of the phases). Construction of the West Pavilion is anticipated to occur during Phase 1, starting as early as 2023. Phase 1 of the projects proposed under the IMP Amendment is anticipated to be complete by 2032. The exact timing for future development beyond Phase 1 is currently unknown but anticipated to be complete by 2042.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

No additions, expansions or further activities are anticipated beyond those included in the IMP Amendment proposal.

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

The following reports were prepared in support of the IMP Amendment and West Pavilion proposal:

- Geotechnical Engineering Report, PeaceHealth St. Joseph Medical Center West Tower, Aspect Consulting, LLC, 2021
- Transportation Impact Analysis, TENW, 2022
- Community Noise Study Report, WSP, 2022
- Cultural Resource Desktop Review of the PeaceHealth St. Joseph Medical Center Institutional Master Plan Amendment, Bellingham Washington; Drayton Archaeology, 2022
- The stormwater report for the West Pavilion is in process and will be available for upcoming permit review.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

Land use and building permits for the proposed SJMC Central Garage, located within the IMP Amendment area, are currently in review by the City of Bellingham.

10. List any government approvals or permits that will be needed for your proposal, if known.

IMP Amendment

City of Bellingham: Institutional Master Plan amendment approval
Miscellaneous City construction permits such as Public Works,
Stormwater, Street Obstruction, Fire and other permits

West Pavilion

City of Bellingham: Planned Development approval
Building Permit
Utilities – Public Facilities Contract
Utilities – Public Works Permit

Washington State Department of Ecology: Construction Stormwater General Permit

Federal Aviation Administration Notice of Proposed Construction or Alteration

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

PeaceHealth, a not-for-profit health care system, operates facilities in Alaska, Oregon, and Washington. St. Joseph Medical Center (SJMC), located in Bellingham, WA, is one of 10 full-service medical centers in the PeaceHealth network. SJMC specifically serves the North Sound and Whatcom County. As the area's primary community hospital, SJMC features a Level 2 trauma center and provides comprehensive specialty care and a full range of specialty healthcare services. Established in 1891 by the Sisters of St. Joseph of Peace, SJMC has provided care for the greater Whatcom County community for more than 130 years.

SJMC currently operates under the 2006 Institutional Master Plan (IMP) for Area 7, Cornwall Park Neighborhood. SJMC owns roughly 80 percent of the approximately 79-acre institutional zone covered by the IMP. There are two zones with hospital and medical facilities, designated in this Environmental Checklist as the IMP Amendment area, which consist of medical support, health care services, and associated uses as described in Section IV, Standards, of the IMP Amendment. The existing hospital (inpatient) use includes about 473,000 square feet of building space and up to 306 beds. The existing medical office (MOB)/clinic (outpatient) uses consist of about 186,000 square feet of building space on the SJMC campus and 136,000 square feet of off-campus building space. The Bellingham Childcare and Learning Center daycare and The Willows Retirement Apartments also operate within the IMP boundary.

Since adoption of the 2006 IMP, PeaceHealth has made adjustments to its future planned development to reflect the region's projected healthcare needs. Population growth in the SJMC service area and an increase in demand for medical procedures, particularly during the COVID-19 pandemic, have resulted in a higher community demand for acute hospital services. A shift toward single-patient rooms rather than the shared, multiple-bed per room model of the past, requires additional or remodeled floor space to accommodate current patient desires. PeaceHealth has determined that a combination of expansion and interior remodel of existing hospital buildings would be the most beneficial path forward to meet community needs. As the growing utilization of the hospital is reviewed, trends show that a higher number of routine procedures that used to require stays in the hospital are now performed in outpatient surgical facilities. This trend shows that patients in hospitals typically have more complex, emergency, or critical-care needs. PeaceHealth is responding to these trends by focusing future development areas of the campus to improve patient services, expand the emergency department, and upgrade and expand neonatal, pediatrics, and women's services.

The IMP Amendment proposal would amend the 2006 IMP to describe the latest existing conditions (reflecting development by PeaceHealth since the 2006 IMP was adopted) and document refinements to the development phasing plans for the SJMC campus through 2042. The boundaries, land use zones, and standards under which SJMC operates, would remain unchanged under the 2022 IMP Amendment proposal. The IMP Amendment proposes the following modified phases of SJMC development:

Phase 1 (Near-Term Projects):

- West Pavilion six-floor addition (about 120,000 square feet) with rooftop helipad, including relocation of the Childbirth Center (see further description below).
- Remodel of the North and South Patient Pavilions: As hospital operations are transitioned into the new West Pavilion, the existing spaces would be remodeled to expand the emergency room facility and add new, updated bed space and nurse station areas.
- The Phase 1 projects would add up to 112 additional beds, increasing the total number on campus from up to 306 beds to up to 418 beds (including both licensed and non-licensed beds).
- Central utility plant addition: A central utility plant (CUP) is the hub of the mechanical, electrical, and plumbing systems for the campus. To accommodate the new West Pavilion operations, an approximately 1,000-square-foot expansion of the CUP is anticipated.
- Airlift Northwest Bellingham Base and Ground Helipad Improvements: A new approximately 1,800 SF modular building just east of the existing ground helipad is proposed to provide office, training and rest space for Airlift Northwest flight crews. This building would replace the existing trailer used for office and rest space. The existing ground helipad would receive improvements to comply with current Federal Aviation Administration regulations.
- Circulation and access improvements including the following:
 - West Pavilion access and drop off improvements
 - Reconfigured vehicular access in the west surface parking lot
 - New covered drop-off lane with increased capacity and bypass lane
 - New/enhanced pedestrian facilities (i.e. new sidewalks, raised crossings, new ADA curb ramps)
 - New/enhanced bus stop location in coordination with Whatcom Transit

Possible Future Projects:

- Internal remodel of vacated Childbirth Center into medical-surgical units.
- New three-level medical office building (MOB) to replace the existing Bunker Building. This project would result in the expansion of the MOB/clinic (outpatient) uses on the campus by approximately 30,400 square feet (future total of up to approximately 216,500 square feet on the hospital campus).
- Addition to main (central campus) parking garage and/or new parking garage on the east side of campus.
- Circulation and access improvements including the following:
 - Squalicum Parkway Bicycle and Pedestrian Improvements
 - Between Coolidge Drive and the northern entry for St. Joseph Hospital (within the IMP boundaries), bicycle and pedestrian facilities on Squalicum Parkway will be determined and implemented in partnership with the City of Bellingham and in accordance with the latest applicable City of Bellingham Pedestrian and Bicycle Master Plans.
 - Squalicum Parkway East Pedestrian Crossing
 - Construct a new marked crosswalk with flashing beacons east of Ellis Street in the vicinity of the hospital east access driveway and Levin Lane. Exact location to be determined at the time of permitting for a future development phase.
 - Squalicum Parkway Access Management
 - To improve safety with the potential increases in westbound vehicle queues at the Squalicum/Ellis Street traffic signal, upon completion of future phase development, conduct monitoring studies in coordination with City staff to evaluate the need for

potential left-turn access restrictions on Squalicum Parkway between Ellis Street and Levin Lane.

West Pavilion

This proposal includes constructing a new medical building, the West Pavilion, as the first phase of development under the IMP Amendment. This proposed six-level structure (about 120,000 square feet) would be an addition to the west side of the existing main hospital building. It would include a new main entrance and lobby for the hospital; expansion and upgrade to the emergency department; critical care, and delivery services, and a rooftop helipad.

The departments within the West Pavilion are envisioned as follows:

- Ground floor: Main lobby, reception, waiting area, chapel
- First floor: Emergency department expansion, progressive care unit, clinical decision unit
- Second floor: Medical-surgical unit expansion
- Third floor: Critical care unit expansion
- Fourth floor: Childbirth Center: Post-Partum, Skilled Care Nursery, Pediatric Beds
- Fifth Floor: Childbirth Center; Labor, Delivery, Recovery, and Postpartum unit; Obstetrics Emergency Department; and Caesarean Delivery
- Roof: Helipad

The rooftop helipad is critical to ensure that patients who come into the hospital for emergency or life-threatening events, or need to be quickly transferred elsewhere, are received or transferred by emergency medical technicians (EMTs) as quickly as possible. Currently, critical care patients arriving or departing the SJMC by helicopter require multiple transfers and handling from the emergency department, including a short trip by private company ambulance. This inefficient patient transfer process also introduces the inherent risk involved in moving a patient from the helicopter, to a gurney, onto an ambulance, then into the emergency room. This update would eliminate the need for the ambulance, as the patient would move directly from the helicopter onto a gurney, and straight down the elevator to the emergency department. A rooftop helipad also would reduce other potential delays and free up EMT crews to respond to calls in the community.

The benefits of this helipad would be substantial, as the hospital is a Level 2 Trauma Center and is the trauma center for four counties in the area, in addition to Ketchikan Alaska. Should patients need to be transferred to Harborview Medical Center in Seattle, a Level 1 Trauma Center, or Children's Hospital, the rooftop helipad allows for quicker and safer transfers in situations where every minute counts. The helipad is anticipated to have a maximum gross weight of 9,000 lbs. The current helipad will continue to be used for helicopter parking, fueling, maintenance, and occasional training for both the medical helicopters, as well as the larger military and coast guard helicopters.

Access and circulation improvements would include:

- Reconfigured vehicular access in the west surface parking lot
- New covered drop-off lane with increased capacity and bypass lane
- New/enhanced pedestrian facilities (i.e. new sidewalks, raised crossings, new ADA curb ramps)
- New/enhanced bus stop location in coordination with Whatcom Transit

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The IMP Amendment area is bounded by Interstate 5 (I-5) on the east, the Squalicum Creek restoration area (former Bug Lake) on the north, Squalicum Parkway and Cornwall Park on the west, and Squalicum Parkway and single-family residential lots along Plymouth Drive to the south. Vehicular access to the IMP Amendment area is provided by Sunset Drive via Ellis Street to the south and by Birchwood Drive/Squalicum Parkway to the west and north (see Figure 1).

Figure 1. IMP Amendment Proposal Site Plan



0 250 500 750 1,000 Feet

- Cornwall Park Neighborhood Area 7 IMP Boundary
- Existing Building
- Proposed Building
- Possible Future Building
- Existing Helipad Improvements

- ① West Pavilion: 6-floor Addition with Rooftop Helipad
- ② Remodel of North and South Patient Pavilions including Emergency Department and Nursing Units
- ③ Central Utility Plant Addition
- ④ Internal Remodel of Existing Unit
- ⑤ ALNW Building
- ⑥ New Medical Office Building
- ⑦ Parking Structure Extension
- ⑧ Parking Structure

The below abbreviated legal description for the PeaceHealth main campus is taken from a recent title report. Legal descriptions for adjacent parcels and properties owned by PeaceHealth are from the Whatcom County Assessor.

**PTN OF LOT 4 & LOTS 21 THRU 32, BLK 9, SQUALICUM PARK PLAT;
BELLINGHAM RETIREMENT APTS BSP; LOTS A & B, ELK'S SHORT PLAT;
LOT A & PTN OF LOT B, EAST CAMPUS SHORT PLAT; PTNS OF LOT 2 &
ALL OF LOTS 1, 3 & 4, ST. JOSEPH MEDICAL OFFICE PLAZA BSP; PTNS OF
TRACT 3, ST. JOSEPH'S HOSPITAL REPLAT; PTN OF LOT A, ST. JOSEPH'S
SHORT PLAT; & LOT B, BELLINGHAM DAY CARE SHORT PLAT;
PARCEL NOS. 380319 435550 0000 PID 63552, 380319 445533 0000 PID 63582,
380319 445533 0001 PID 63583, 380319 445474 0000 PID 63580, 380319 445474 0001
PID 63581, 380319 447507 0000 PID 63584, 380319 418514 0000 PID 63451, 380319
407536 0000 PID 63395, 380319 392510 0000 PID 63289, 380319 380485 0000 PID
63201, 380319 406472 0000 PID 63389, 380319 344526 0001 PID 63054, 380319
498487 0000 PID 63815, 380319 482468 0000 PID 63731, 380319 393536 0000 PID
63310, 380319 378525 0000 PID 63190, 380319 392510 0001 PID 63290, 380319
344526 0000 PID 63053, 380319 245510 0000 PID 62804**

Vacant parcel north of campus owned by PeaceHealth

Property ID: 61607

Abbreviated Legal: SLY 329.9 FT of S ½ SW SE

3 Parcels on south side of Squalicum, west of Ellis Street owned by PeaceHealth

Property ID: 62927

2940 Squalicum Pkwy

Abbreviated Legal: LOT B ST JOSEPH'S HOSPITAL SHORT PLAT No 4 AS REC

Property ID: 63036

2950 Squalicum Pkwy

Abbreviated Legal: I M A CONDOMINIUM LOT A ST JOSEPH'S HOSPITAL SHORT

Property ID: 63127

2980 Squalicum Pkwy #305

Abbreviated Legal: BELLINGHAM DAY SURGERY CONDOMINIUM UNIT 305-TOG WI

West Pavilion

The proposed West Pavilion would be an extension of the existing SJMC Hospital building located at 2901 Squalicum Parkway, Bellingham, WA 98225. Figure 1 shows the location of the proposed West Pavilion (labeled as #1 and shaded in blue on the figure). The abbreviated legal description for the West Pavilion is the same as that provided for the SJMC main campus above.

B. Environmental Elements [\[HELP\]](#)

1. Earth [\[help\]](#)

a. General description of the site:

(circle one): **Flat**, rolling, hilly, steep slopes, mountainous, other _____

The IMP Amendment area is generally flat except along the north edge, which slopes down to Squalicum Creek. An undeveloped forested slope of approximately 50 vertical feet with grades as steep as 40 percent exists between the SJMC Open Space and the developed campus areas. Landscaped areas adjacent to Squalicum Parkway at the western limits of the campus also have slopes as steep as 40 percent. The existing grade across the footprint of the proposed West Pavilion varies between 143 and 145 feet.

b. What is the steepest slope on the site (approximate percent slope)?

The steepest slopes within the IMP Amendment area are located along the north and northwestern boundaries with slopes to approximately 40 percent.

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

Soils within the IMP Amendment area include LaBounty silt loam complex, McKenna silty clay, and Whatcom silt loam. Soils within the West Pavilion site include layers of fill (dense silty sand with gravel), glaciomarine drift (medium stiff to hard clay with varying amount of sand and gravel), and glacially consolidated soil (very dense silty sand).

The IMP Amendment area, including the proposed West Pavilion site, does not contain any prime farmlands or agricultural soils.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

There are no known unstable soils in the IMP Amendment area, including the West Pavilion site.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

For the proposed West Pavilion, which has a total site area of about 150,000 square feet, fill activities would include the following:

- Cut to fill – 0 CY/0 SF (assumed no reuse of material)
- Structural subgrade – 3700 CY/30,000 SF
- Capillary break - 350 CY /17,200 SF
- Site utility bedding material - 8000 CY/ 40,000 SF (includes bed/backfill for pipe/structures and vaults)
- Gravel below HMA - 475 CY/59,000 SF (includes road patch)
- Gravel Borrow Working Pad in Demolition Areas – 3200 CY/86,400 SF

It is anticipated that the West Pavilion project will use pit fill or structural fill from Singer Pit in Everson, WA. There would be about 30,000 square feet of structural foundation excavation and about 40,000 square feet of site utility excavation. There would also be about 25,300 square feet of grading for landscape subgrade.

For future phases of the IMP Amendment proposal, more detailed information about filling, excavation and grading will be provided during project-specific environmental review.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. Minor erosion could occur because of ground disturbance associated with construction activities associated with the West Pavilion and other future development planned under the IMP Amendment. The potential for erosion during construction or use will be minimized with adherence to best management practices (BMPs) approved by the Washington State Department of Ecology and the appropriate provisions of Bellingham Municipal Code. The proposal will comply with applicable temporary erosion and sedimentation control measures required by the City and the National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit's Surface Water Pollution Prevention Plan (SWPPP), where required.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

Because future proposed buildings, parking and circulation improvements under the IMP Amendment would occur primarily in areas that are currently covered with impervious surfaces, the amount of future impervious surface area under the proposed IMP Amendment would remain similar to existing conditions. The IMP requires that a minimum of 20 percent of the IMP area be maintained as open space. The northern undeveloped portion of the IMP Amendment area, referred to in the IMP as Area 3, will remain as open space and satisfies SJMC's requirement for maintaining open space per the 2006 IMP.

The proposed West Pavilion would result in approximately 2 acres of new and replaced hard surface areas including roof, sidewalk, and road/parking lot surfacing.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

All earthwork and site preparation will be conducted in compliance with relevant grading criteria of the Bellingham Municipal Code Section 16.70. Temporary Erosion and Sedimentation Control (TESC) measures to be implemented would include, but not be limited to, the following:

- The ground surface in the construction area would be sloped and sealed to reduce water infiltration, to promote rapid runoff, and to prevent water ponding.
- To prevent soil disturbance, the size or type of construction equipment may have to be limited.
- No soil would be left uncompacted and exposed to moisture. A smooth-drum vibratory roller, or equivalent, would be used to seal the ground surface.
- Work areas and soil stockpiles would be covered with plastic. Bales of straw and/or geotextile silt fences would be used as appropriate to control soil erosion.
- Excavation and fill placement would be observed on a fulltime basis by a geotechnical engineer (or engineer's representative) experienced in wet weather earthwork to determine that unsuitable materials are removed and that suitable compaction and site drainage is achieved.
- Excavation slopes would be protected from infiltration and erosion by directing water away from excavations and covering slopes with impermeable membranes, such as plastic sheeting.
- Excavated materials, stockpiles, and equipment would be placed away from the top edge of excavations a distance equal to at least the depth of the excavation.

Dewatering of soils would be performed during construction, as required.

2. Air [\[help\]](#)

- a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

Construction-related activities would result in direct, short-term impacts, such as increases in particulate matter in the form of fugitive dust (from ground clearing and preparation, grading, stockpiling of materials, on-site movement of equipment, and transportation of construction materials), and exhaust emissions from material delivery trucks, construction equipment, and workers' private vehicles. Dust emissions typically occur during dry weather, periods of demolition, construction activities, or high wind conditions. Construction of the West Pavilion and Phase 1 improvements is expected to last about 2 years. The construction timeline for future phases under the IMP Amendment would be determined and evaluated in project-specific environmental review.

Disruption of traffic during construction (such as a temporary reduction in roadway capacity and increased queue lengths) could result in short-term, elevated concentrations of pollutants from slowed or idling vehicles. Common air pollutants from vehicle exhaust are carbon monoxide, nitrogen oxides, volatile organic carbon, particulate matter, and a set of pollutants referred to as Mobile Source Air Toxics.

Development under Phase 1 of the IMP Amendment, including the West Pavilion, would generate an increase of approximately 2,500 net new weekday daily trips, including 200 net new weekday AM peak hour trips (144 inbound and 56 outbound) and 189 net new weekday PM peak hour trips (62 inbound and 127 outbound) by 2032. Full buildout of the IMP Amendment, including Phase 1 and future potential projects, is estimated to generate a total of 3,582 net new weekday daily trips with 282 net new trips occurring during the weekday AM peak hour (210 in, 72 out), and 282 net new trips occurring during the weekday PM peak hour (85 in, 197 out), by 2042. These vehicle trips would generate a relatively minor amount of additional pollutant emissions when compared to the contribution of existing vehicles. Furthermore, vehicle emissions typically decrease over time due to implementation of vehicle standards and improved technology. Traffic associated with new development under the proposed IMP Amendment would not be expected to cause significant increases in pollutant levels and significant air quality impacts are not anticipated.

The proposed project has been designed to conform to the applicable regulations and standards of agencies regulating air quality. These include the U.S. Environmental Protection Agency (EPA), Washington State Department of Ecology, and the Northwest Clean Air Agency.

- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

Vehicle traffic from I-5, Ellis Street, and Squalicum Parkway are other local roads and the primary source of air emissions in the area. Off-site emissions are not expected to affect the proposed IMP Amendment area, including the West Pavilion.

- c. Proposed measures to reduce or control emissions or other impacts to air, if any:

Air quality in the City of Bellingham is regulated by the U.S. Environmental Protection Agency, the Washington State Department of Ecology, and the Northwest Air Pollution Authority. Each agency has regulations that govern the concentration of pollutants and contaminant emissions. SJMC provides commuting options to reduce single vehicle occupancy and vehicle emissions.

To reduce air emissions during construction of the proposed West Pavilion and other future development under the IMP Amendment, a suite of best available control measures would be implemented, which likely will include some of the following:

- Spray exposed soil with water or other dust palliatives to reduce emissions and deposition of particulates.
- Cover all trucks transporting materials, wet materials in trucks, or provide adequate freeboard (space from the top of the material to the top of the truck) to reduce emissions and deposition of particulates during transportation.
- Remove particulate matter deposited on paved, public roads to reduce mud and resultant windblown dust on area roadways.
- Route and schedule construction trucks to reduce delays to traffic during peak travel times to reduce secondary air quality impacts caused by a reduction in traffic speeds while waiting for construction trucks.
- Use relatively new, well-maintained equipment to reduce carbon monoxide and nitrogen oxide emissions.
- Route construction trucks away from residential areas to minimize annoyance from dust.

3. **Water** [\[help\]](#)

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

- 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

The undeveloped portion of the IMP Amendment area north of the SJMC campus contains a portion of Squalicum Creek. The former Bug Lake area just north of the IMP boundary contains additional rerouted segments of Squalicum Creek and a forested wetland restoration area. There are no other surface water bodies within the IMP Amendment area.

- 2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

No work in, over or within 200 feet of any water features would be required under the IMP Amendment proposal, including the West Pavilion.

- 3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

No temporary or permanent placement or removal of fill and dredge material from surface water or wetlands would occur under the IMP Amendment proposal, including the West Pavilion.

- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

No temporary or permanent surface water withdrawals or diversions would be required under the IMP Amendment proposal, including the West Pavilion.

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

The IMP Amendment proposal, including the West Pavilion site, does not contain any mapped

floodplains.

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

The IMP Amendment proposal, including the West Pavilion, does not involve discharges of waste materials to surface waters. All new impervious surfaces would include stormwater treatment per City standards.

b. Ground Water: [\[help\]](#)

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

No groundwater would be withdrawn from a well for drinking water or other purposes. Dewatering could be required for building foundation and floor slab installation; however, buildings constructed under the proposed IMP Amendment would be designed to minimize the need for dewatering. Any dewatering would be routed to the overall stormwater system. The proposal does not include plans to discharge water to groundwater due to relatively impermeable soils.

Stormwater control and treatment facilities would be designed and built consistent with applicable Washington State Department of Ecology and City of Bellingham regulations.

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

No waste material would be discharged into the ground or groundwater as the result of the proposed development under the proposed IMP Amendment, including the West Pavilion.

c. Water runoff (including stormwater):

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

Stormwater runoff from roofs and paved areas is the only source of water runoff expected from the development under the IMP Amendment. Because new development under the IMP Amendment would primarily occur within currently developed areas, the overall amount of impervious surfaces would be similar to current conditions.

Runoff from the IMP Amendment area, including the West Pavilion project area, currently flows to two separate locations (separate threshold discharge areas, or TDAs). Stormwater management codes will apply separately to each drainage basin. Approximately half the area drains to the north into the undeveloped conservation area, and about half is conveyed south into the municipal system.

The north basin is developed and relatively flat. Stormwater runoff sheet flows into existing catch basins on the site. The runoff is then conveyed via pipes to the east between the main building and the existing portable buildings to the loading dock area. The runoff is then conveyed north under the existing helipad and outfalls into the existing wetlands north of the property. Any runoff that does not infiltrate will sheet flow to the north into Squalicum Creek and eventually into Bellingham Bay.

The south basin is flat with slopes increasing as the property approaches the south at Squalicum Parkway right of way. The runoff sheet flows into existing catch basins and is conveyed south via pipes where it enters the City of Bellingham storm sewer system. The surface water runoff is conveyed to the west into a tributary of Squalicum Creek that flows to the north through Cornwall Park until it enters Squalicum Creek and eventually into Bellingham Bay. See the response to question B.3.d below for a discussion of flow control and runoff treatment for stormwater from the West Pavilion.

The proposed West Pavilion would result in approximately 2 acres of new and replaced hard surface areas including roof, sidewalk, and road/parking lot surfacing. The project would also reroute the existing storm sewer conveyance pipe in the north basin around the existing buildings and connect to an existing storm sewer south of the existing helipad.

2) Could waste materials enter ground or surface waters? If so, generally describe.

There is an unlikely possibility that minimal amounts of petroleum products, sediments, or concrete materials could occur from construction and operation of the West Pavilion and other proposed development under the IMP Amendment. Spill prevention BMPs would be followed during construction to avoid such spills. The contractor would be required to prepare a Spill Prevention Control and Countermeasures (SPCC) Plan for the project prior to beginning construction. Waste material could include stormwater runoff from vehicular traffic, such as tire dust and oil. The waste would be mitigated as required by local current adopted codes for water quality treatment. Water quality control measures will be implemented per City of Bellingham standards. The amount of waste material entering surface or ground waters would not impact the quality of surface or groundwater.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

Development under the proposed IMP Amendment and West Pavilion would not affect drainage patterns in the vicinity of the site.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

Construction:

- Construction impacts would be confined to the minimum area necessary to complete the project.
- Exposed soils would be stabilized or covered with an erosion control BMP during periods of inactivity or anticipated heavy rain events.
- Use of erosion control BMPs would be employed, such as mulch, silt barriers, containment systems, or interim stormwater controls.
- Oil, fuels, or chemicals would not be discharged to the stormwater system or land where there is the potential for reentry into surface waters.
- BMPs such as a SWPPP that includes a TESC Plan and a SPCC Plan would be developed and implemented.

Operation: For all development in the IMP Amendment area, stormwater treatment facilities would be constructed to treat and detain stormwater runoff from new and existing impervious surfaces. The facilities would comply with City of Bellingham and Washington State Department of Ecology requirements.

The West Pavilion project will include construction of stormwater management facilities that provide the required flow control and runoff treatment. The project will provide enhanced treatment sized to treat a minimum of 91 percent of all predicted stormwater runoff volumes. The current design proposes a

Modular Wetland System to meet enhanced treatment requirements. Flow control facilities will be constructed to serve all new surface areas and are anticipated to be constructed underground due to the site development footprint. The West Pavilion project intends to use an underground vault in each TDA to maintain the existing discharge locations. In addition, the north basin will use an equivalent area within the north basin that is not currently receiving flow control to meet the flow control requirements for the basin.

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

a. Check the types of vegetation found on the site:

- ☒ deciduous tree: western hemlock, red alder, bigleaf maple, northern red oak.
- ☒ evergreen tree: douglas fir, western red cedar.
- ☒ shrubs: osmanthus, viburnums, rhododendron, creeping junipers, barberries, and Otto Luyken laurel.
- ☒ grass
- ☐ pasture
- ☐ crop or grain
- ☐ Orchards, vineyards or other permanent crops.
- ☒ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- ☐ water plants: water lily, eelgrass, milfoil, other
- ☒ other types of vegetation: red huckleberry, western swordfern, Oregon grape, western Bracken fern, salal.

b. What kind and amount of vegetation will be removed or altered?

The proposed development under the IMP Amendment is located in a highly developed environment with institutional and residential buildings and roads. Vegetation near the West Pavilion and other proposed development under the IMP Amendment is limited to street trees and campus landscaping. New development under the IMP Amendment would include new planted areas designed in accordance with existing City of Bellingham and IMP landscape standards, IMP Section IV.F. The native vegetation at the north end of the IMP Amendment area would be retained.

At the West Pavilion site, about 44,000 square feet of ornamental campus-type vegetation, lawn, and vegetation in the parking lot planting islands will be removed during construction of the building.

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

According to the Washington State Department of Natural Resources Natural Heritage Program mapping, no listed threatened or endangered plant species are mapped as occurring in the IMP Amendment area, including the West Pavilion site.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

Development of sites under the IMP Amendment would incorporate landscaping as required by the Bellingham Municipal Code and discussed in IMP Section IV.D, Open Space Requirements, and IMP Section IV.F, Landscape Requirements.

At the West Pavilion site, the total area of proposed planting is about 18,000 square feet. Some of the existing red maple trees on the site will be preserved. Proposed landscaping will reestablish the campus landscape, parking lot islands and garden areas with new plants and new lawn areas. Plant selection for the West Pavilion site has not been finalized. It will include plants suited to the microclimate conditions

prevailing on the site, including the paved parking lot and building configurations that will alter the sun-shade profile. Other plant selection considerations for the West Pavilion will include seasonal variety, the ability to thrive under maintenance practices, potential benefits for native invertebrates/insects, and what plants are currently thriving on the existing campus. The specification for imported soil and plant material will include requirements that the plant material and the soil be weed, disease, and pest free.

e. List all noxious weeds and invasive species known to be on or near the site.

Introduction of noxious weeds or invasive species would be avoided to the extent practicable in developed and landscaped areas as part of developments proposed under the IMP Amendment.

The proposed West Pavilion is located within the larger SJMC campus that features maintained landscaped areas and parking lot landscaping. No invasive or noxious species were observed in the immediate vicinity of the proposed project.

5. **Animals** [\[help\]](#)

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

Examples include:

birds: **hawk, heron, eagle, songbirds**, other: **Osprey, ducks, geese, woodpeckers**

mammals: **deer**, bear, elk, **beaver**, other: **squirrels**

fish: bass, **salmon, trout**, herring, shellfish, other _____

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

The Squalicum Creek wetland area, which crosses into the northern portion of the IMP Amendment area (area immediately south of the former Bug Lake), is identified as a state Priority Habitat by the Washington Department of Fish and Wildlife. No threatened or endangered species are known to be on or near the proposed IMP Amendment area or West Pavilion. Occasional bald eagle sightings were recorded in the vicinity; however, no eagle nests are known to exist in the IMP Amendment area or the West Pavilion vicinity. Squalicum Creek currently supports pink, chum, and coho salmon, as well as resident and sea-run cutthroat trout, but none of these species is threatened or endangered. No development is proposed in the immediate vicinity of Squalicum Creek and no direct or indirect impacts to aquatic species are anticipated.

c. Is the site part of a migration route? If so, explain.

The greater area is within the Pacific Flyway, which is a flight corridor for migrating waterfowl and other avian fauna. The Pacific Flyway extends south from Alaska to South America. Other than the Pacific Flyway and potentially Squalicum Creek for fisheries, the site is not a part of any known migration route. Little to no connectivity exists between the IMP Amendment area and any larger patches of offsite habitat, and no definable migration corridors exist within the IMP Amendment area for land animals.

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

Use of wildlife habitat is limited throughout the area by the presence of the built environment and the lack of habitat features in the immediate vicinity of the project. Therefore, impacts to wildlife as a result of the IMP Amendment proposal, including the West Pavilion, are not anticipated. No in-stream work within Squalicum Creek would occur under the proposed IMP

Amendment, including the West Pavilion, and the wetland buffer will be maintained.

IMP Section IV.D, Open Space Requirements, requires that at least 20% of the IMP area be maintained as open space. Zone 3 of the IMP is an open space natural area between the SJMC and the Squalicum Creek restoration area. St. Joseph Hospital granted the City of Bellingham a perpetual easement in 2002 to permit conservation, public access and enhancement of the open space. The natural vegetation in Zone 3 will be retained and would continue to provide wildlife habitat. The IMP includes standards for new landscaped areas and would provide limited habitat for birds and small animals. Stormwater runoff during construction and operation of new development would be controlled consistent with applicable standards to minimize erosion impacts to Squalicum Creek and the wetland in the northern portion of the IMP Amendment area.

e. List any invasive animal species known to be on or near the site.

No invasive animal species are known to be present near the proposed IMP Amendment area, including the West Pavilion.

6. Energy and Natural Resources [\[help\]](#)

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Proposed development under the IMP Amendment, including the West Pavilion, would require energy consumption for lighting, heating, air conditioning, security systems, computing, and medical equipment. Energy sources would be electricity and natural gas.

b. Would your project affect the potential use of solar energy by adjacent properties?

If so, generally describe.

The proposed development under the IMP Amendment, including the West Pavilion, would not have a measurable effect on the use of solar energy by adjacent properties.

c. What kinds of energy conservation features are included in the plans of this proposal?

List other proposed measures to reduce or control energy impacts, if any:

The proposed development under the IMP Amendment would conform to applicable provisions of the State of Washington Energy Code and would comply with the City of Bellingham Public Works' Development Guidelines and Improvement Standards Manual.

The Central Utility Plant expansion will include a heat recovery chiller to serve the new West Pavilion. The chiller will extract heat from the West Pavilion general exhaust and use it to preheat domestic hot water and heating hot water. Both the West Pavilion and the Central Utility Plant will include reduced lighting power compared to the base energy code requirements.

Specific features of additional IMP proposed improvements will be determined during final design. Energy-efficient products and design will be considered at that time.

7. Environmental Health [\[help\]](#)

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur because of this proposal?

If so, describe.

During construction of the development under the IMP Amendment, including the West Pavilion, relatively small quantities of fuel for various pieces of small equipment would likely be stored on-site. This could include diesel, gasoline, and propane. Heavy equipment fueling would likely occur using an on-site fuel delivery provider. Other construction-related materials likely would include solvents and adhesives used in relatively small quantities. Utility relocations and connections (electrical power, sanitary sewer, water) would occur during construction. As the design progresses, additional permitting and appropriate measures would be accommodated to comply with the applicable requirements for each utility.

After construction of the proposed development in the IMP Amendment, including the West Pavilion, no hazardous materials would be stored, used, or generated, aside from chemicals and other materials typical of a medical center. Use, storage and handling of medical materials would occur in accordance with established procedures consistent with state and federal regulations. Accidental spills, or drips, from vehicles parked at elevated parking facilities could occur. For these instances, emergency spill cleanup kits could be staged at these locations. Wastes generated from cleanup activities would be removed and disposed of in accordance with state and federal regulations for the removal, treatment, or disposal of contaminated material. Pollutants deposited on the roadway would be managed by the stormwater treatment facilities and additional landscaping buffers that would collect and retain pollutants.

- 1) Describe any known or possible contamination at the site from present or past uses.

According to the Washington State Department of Ecology mapping tool, there are no documented leaking underground storage tank sites and/or hazardous material release sites in the IMP Amendment area, including the West Pavilion site.

- 2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

While not anticipated, historical urban land use, roadway, and parking operation raise the potential of encountering contaminated materials during construction. Procedures to identify, characterize, manage, handle, store, and dispose of contaminated soil and groundwater encountered during construction activities would be incorporated into project specifications.

In compliance with the Model Toxics Control Act Cleanup Regulation (Washington Administrative Code 173-340), during the construction of the proposed West Pavilion and other development projects under the IMP Amendment proposal, hazardous materials from disturbed soils, groundwater, and the portions of sites that are acquired would be removed. This elimination of hazardous materials would reduce future potential adverse effects to human health and the environment from exposure at those locations or from potential migration.

- 3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

No toxic or hazardous chemicals are expected to be stored, used, or produced during the construction or operation of development projects in the IMP Amendment area, including the West Pavilion.

- 4) Describe special emergency services that might be required.

No special emergency services are expected to be required because of construction or operation of the proposed West Pavilion and other development under the IMP Amendment. Service for fire and hazardous materials (chemical spills) would be provided by the City of

Bellingham Fire Department. Security services would be provided by the City of Bellingham Police Department and SJMC security personnel.

The potential of long-term recurring releases of hazardous materials from operations is low. Accidental spills or drips from vehicles parked on elevated parking facilities could occur. For these instances, emergency spill cleanup kits could be staged at these locations. Wastes generated from cleanup activities would be removed and disposed of in accordance with state and federal regulations for the removal, treatment, or disposal of contaminated material.

5) Proposed measures to reduce or control environmental health hazards, if any:

BMPs, including commitments to adhere to applicable regulations, include measures for controlling hazardous materials planned for use within the context of constructing, operating, and maintaining the elements of the proposed IMP Amendment, including the West Pavilion. No additional mitigation measures are needed.

All potentially hazardous materials used during construction would be handled and stored in accordance with state and federal hazardous materials handling requirements. If unanticipated residual soil contamination is encountered during construction activities, the remediation of any contaminated soil and groundwater would occur as needed. A formal plan would be developed consistent with state and federal regulations for their removal and treatment or disposal of contaminated soil and groundwater, and measures would be implemented to minimize exposure to people in accordance with applicable regulations.

b. Noise

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

Noise sources in the area include traffic on I-5, Ellis Street, Birchwood Drive/Squalicum Parkway, and other local streets, noise associated with HVAC systems on SJMC building rooftops, and helicopter sounds associated with emergency medical operations and the existing helipad on the SJMC campus.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

The state of Washington has a noise control ordinance that applies to general construction activities. The proposed new development would create typical construction noise from heavy equipment that generates relatively high noise levels. The most constant noise source at construction sites is usually engine noise. Mobile equipment generally operates intermittently or in cycles of operation, while stationary equipment, such as generators and compressors, generally operates at constant sound levels. Trucks would be present during most phases of construction and would not be confined to the proposed construction locations, so noise from trucks may affect more receivers than other construction noise. Pile driving would not occur during construction.

Construction would increase noise levels that would be temporary and intermittent and would cease once construction is complete. The maximum noise levels of construction equipment are expected to range from 76 dBA to 88 dBA at a distance of 50 feet. Noise-sensitive receivers located within about 500 feet could be exposed to construction noise levels but are not predicted to exceed noise criteria at the closest receivers. Working hours of construction would vary to meet the type of work being performed, and construction activities would adhere to local regulations to control construction noise. Construction outside of specified daytime hours would

require an approved variance from regulated local nighttime noise limits, which would prompt further coordination with the City of Bellingham.

The rooftop helipad on the proposed West Pavilion would result in changes to future short-term noise levels during medical helicopter operations. Future medical helicopter flights to and from the proposed future helipad location on the West Pavilion building rooftop would result in short-term increases in maximum community noise levels ranging from 0 to 6 A-weighted decibels (dBA) as compared with noise levels associated with the existing ground helipad location on the north end of campus. Increases in maximum helicopter noise levels would be highest at areas closest to the future rooftop helipad located atop the West Pavilion and would be clearly perceptible in the southwest quadrant of the SJMC campus. No changes in existing helicopter flight paths are anticipated during future operations. In addition, the IMP Amendment would result in no changes to mechanical equipment on SJMC buildings or military helicopter operations; thus, no change in community noise levels is expected from these noise sources.

3) Proposed measures to reduce or control noise impacts, if any:

PeaceHealth's contractor would obtain noise variances, if needed, from the City of Bellingham if construction activities occurred outside of specified daytime hours. Noise-reducing construction methods that may be implemented could include, but would not be limited to, the following:

- Use low-noise emission equipment
- Use broadband backup warning devices on all vehicles
- Monitor and maintain equipment to meet noise limits
- Use acoustic enclosures, shields, or shrouds for equipment and facilities
- Minimize the use of generators

All medical helicopter pilots and operators using the existing and proposed helipads on the SJMC campus will continue to receive training that includes noise abatement procedures and situational awareness tools designed to minimize the effects of helicopter noise emissions on communities.

Noise during operation of the proposed development under the IMP Amendment is not expected to exceed federal or local thresholds. Therefore, mitigation measures would not be required.

8. Land and Shoreline Use [\[help\]](#)

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

The IMP Amendment proposal site currently includes three primary land use zones: a medical support zone south of Squalicum Parkway (known as Zone 1 in the IMP); the developed area of the SJMC campus featuring acute care, in-patient and long-term care clinics, outpatient diagnostic and treatment services, an assisted living facility, and medical support uses (Zone 2 in the IMP); and an open space natural area between the SJMC and the Squalicum Creek restoration area (Zone 3 in the IMP). A perpetual easement was granted by St. Joseph Hospital to the City of Bellingham in 2002 to permit conservation, public access and enhancement of the open space.

In addition to the Squalicum Creek restoration area to the north, land uses adjacent to the IMP

Amendment area include I-5, industrial and commercial land uses to the east; Squalicum Parkway, institutional and residential land uses, and Cornwall Park to the west; and the Cornwall Park residential neighborhood to the south.

The IMP Amendment proposal, including the West Pavilion, includes land uses that are consistent with existing uses of the SJMC property and would not affect current land uses on nearby or adjacent properties. The proposed West Pavilion site is an addition to an existing hospital building and thus consistent with existing land uses.

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

Land near the IMP Amendment area may have been used as farmland in the past; however, development has existed since the early 1900s. There are currently no farms operating at the IMP Amendment site. Additionally, no agricultural or forest land of commercial significance would be converted as a result of the IMP Amendment development, including the West Pavilion.

- 1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

No nearby working farms or forest land businesses that would be affected by the proposal.

- c. Describe any structures on the site.

The IMP Amendment area currently contains approximately 24 structures, which are primarily medical facilities of various sizes. The largest structure is the St. Joseph Main Hospital Building (453,000 square feet), followed by The Willows Retirement Apartments (129,800 square feet), St. Francis of Bellingham Extended Health Care (42,000 square feet), Medical Office Plaza (39,900 square feet), Northwest Medical Center (39,900 square feet), and Bellingham Day Surgery (25,700 square feet).

- d. Will any structures be demolished? If so, what?

The IMP Amendment proposal includes demolishing the existing Bunker Building and replacing it with a new structure. The proposed West Pavilion would not require removal of existing structures.

- e. What is the current zoning classification of the site?

The City of Bellingham zoning classification of the IMP Amendment area, including the West Pavilion site, is Institutional.

- f. What is the current comprehensive plan designation of the site?

The IMP Amendment area, including the West Pavilion site, is currently designated for Institutional Use in the Cornwall Park neighborhood Comprehensive Plan.

- g. If applicable, what is the current shoreline master program designation of the site?

Squalicum Creek is designated as Urban Conservancy under the 2013 Bellingham Shoreline Master Program. This designation relates to area within 200 feet of the ordinary high-water mark of the creek. Thus, a portion of the northern section of the IMP Amendment area is within the Shoreline Master Plan jurisdiction. However, the northern undeveloped portion of the IMP Amendment area is proposed to remain as open space, and no development within the shoreline zone would occur under the IMP Amendment proposal. The proposed West Pavilion is

not located within the City of Bellingham Shoreline jurisdiction.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify. The Squalicum Creek wetland area, which crosses into the northern portion of the IMP Amendment area (the Zone 3 area immediately south of the former Bug Lake), is identified as a state Priority Habitat by the Washington Department of Fish and Wildlife. The developed portion of the IMP Amendment area, including the West Pavilion site, does not contain any environmentally sensitive or critical areas.

i. Approximately how many people would reside or work in the completed project? The IMP Amendment area currently contains an employee population of approximately 1,790 full time PeaceHealth employees. The additional licensed beds that would be added under Phase 1, including the West Pavilion, would require the addition of approximately 220 full time employees for a total employee population of approximately 2,010 full time employees. Employment needs for future phases of the IMP Amendment would be determined as those projects move forward with design and environmental review.

j. Approximately how many people would the completed project displace? No displacement impacts would result from the proposed project.

k. Proposed measures to avoid or reduce displacement impacts, if any: Impacts related to displacement are not anticipated. Therefore, no mitigation measures are proposed.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: The IMP Amendment, including the West Pavilion, is being developed in accordance with the City's Comprehensive Plan and Municipal Code.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any: The proposed IMP Amendment and West Pavilion would not affect agricultural or forest lands of long-term commercial significance. Therefore, no mitigation measures are proposed.

9. Housing [\[help\]](#)

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. No new housing would be provided as part of future development under the proposed IMP Amendment, including the West Pavilion.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing. No housing units would be eliminated by the proposed IMP Amendment, including the West Pavilion.

c. Proposed measures to reduce or control housing impacts, if any: Because there would be no housing impacts, no measures are proposed.

10. Aesthetics [\[help\]](#)

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

The tallest height of the proposed structures in the IMP Amendment is the six-story West Pavilion, which is anticipated to be approximately 110 feet in height. Other proposed structure heights for developments under the IMP Amendment proposal would be determined as design progresses.

It is anticipated that the principal exterior building material for the West Pavilion and other future development would be glass and metal. The architectural materials for other proposed structures under the IMP Amendment would be determined during final design.

- b. What views in the immediate vicinity would be altered or obstructed?

The immediate vicinity is the hospital campus. The visual character of the proposed structures would be consistent and compatible with other medical office buildings typically found in a hospital campus setting. No adverse impacts are anticipated.

- c. Proposed measures to reduce or control aesthetic impacts, if any:

The West Pavilion will utilize reflective glazing to enhance the surrounding aesthetics and complementary colors of proposed finishes to align with the existing building. The building aesthetic is intended as a modern extension of the campus.

The existing IMP includes standards that would relate to aesthetics for all new development within the IMP Amendment area, including standards for permitted uses, setbacks, landscaping, parking/loading, and streets. New development under the IMP Amendment would adhere to these standards and applicable City code.

11. Light and Glare [\[help\]](#)

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

Development under the IMP Amendment proposal would generate light and glare typical of medical center inpatient and related outpatient use, including street lights, exterior and interior building lighting, and light associated with motor vehicles. The overall level of light and glare within the IMP Amendment area would increase with proposed new development, including the West Pavilion. The new sources of light and glare would be a continuation of the existing levels and pattern of light and glare within the IMP Amendment area and would not degrade the overall visual quality as existing lighting is already pervasive from the street and adjacent development.

Light and glare associated with vehicles would generally be greatest during the AM and PM peak traffic hours. The proposed development could also generate light in the form of light spillage through transparent surfaces during evening, nighttime and early morning hours. This would not degrade the overall visual quality as existing lighting is already pervasive from the street and adjacent development.

During construction, lights may be used to safely illuminate workspaces, which could cause spillover light onto adjacent parcels. Construction lighting at sites under the IMP Amendment, including the West Pavilion, would be directed away from adjacent streets to the extent practicable to avoid creating a glare impact to nighttime drivers and nearby residents or commercial areas.

- b. Could light or glare from the finished project be a safety hazard or interfere with views?

Light or glare from the proposed development under the IMP Amendment, including the West Pavilion, is not anticipated to be a safety hazard or interfere with views.

c. What existing off-site sources of light or glare may affect your proposal?

No existing off-site sources of light or glare (including nearby residences, commercial areas, traffic on local roads, and street lighting) would affect the proposal.

d. Proposed measures to reduce or control light and glare impacts, if any:

All new lighting would adhere to the lighting standards established by the original IMP. Exterior lighting would be designed according to applicable City of Bellingham regulations related to lighting, and would be shielded and/or directed downward to minimize light and glare on adjacent properties.

Most lighting will be noticeable in the evening. The West Pavilion will utilize spandrel panels, as feasible, to control light passage from the interior while maintaining daylighting opportunities. Specific measures related to other proposed development under the IMP Amendment will be determined as appropriate as design progresses.

During construction, activity would be limited to daytime hours whenever possible. Lights would be directed away from residential areas when nighttime construction is necessary.

12. Recreation [\[help\]](#)

a. What designated and informal recreational opportunities are in the immediate vicinity?

Cornwall Park, a City of Bellingham park located west of the IMP Amendment area, provides recreational opportunities. The hospital area also includes nature trails and pedestrian sidewalks. There are no other designated or informal recreational opportunities in the immediate vicinity of the IMP Amendment area, including the West Pavilion.

b. Would the proposed project displace any existing recreational uses? If so, describe.

Development under the IMP Amendment, including the West Pavilion, would not displace any existing recreational uses or directly affect the recreational areas in the immediate vicinity.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

There are no anticipated impacts to recreational resources or opportunities resulting from the IMP Amendment proposal and West Pavilion; therefore, no measures to reduce or control impacts are proposed.

13. Historic and cultural preservation [\[help\]](#)

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.

There are no known buildings, structures, or sites located on or near the IMP Amendment site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

There are no known landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or within 0.25 miles of the IMP Amendment site, including the West

Pavilion location. However, the Washington Department of Archaeology and Historic Preservation's (DAHP) Statewide Predictive Model identifies the eastern portion of the SJMC campus, including the existing main hospital building, as a "moderate risk" probability for discovery of archaeological resources.

The 2022 *Cultural Resource Desktop Review of the PeaceHealth St. Joseph Medical Center Institutional Master Plan Amendment, Bellingham Washington*, confirmed that the probability of encountering precontact or historic resources is moderate. The project is situated in an inland partially forested/(re-forested) environment within an area of historic marsh/swamp/wetlands. Due to the limitation of resources available and inhospitality of the environment for camping or settling, the restriction of the natural context would have precluded all but temporary or ephemeral precontact resource collection activities. As such, significant archaeological deposits or accumulations would be unlikely. If cultural resources were to be present in the project, they could be expected to be located near the present ground surface, as review of the environmental context indicates little soil development has occurred in the local area since the last glaciation. Types of cultural resources that may be encountered in the project could include trails or similar features representing a range of hunting, fishing, plant gathering, and/or ceremonial activities or historic homesteads with trash scatters or artifacts associated with logging activities and/or transportation.

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

GIS data from the Washington DAHP Statewide Predictive Model and the Washington Information System for Architectural and Archaeological Records Data were used to assess potential impacts to cultural and historic resources on or near the project site. Drayton Archaeology was also retained to conduct a desktop review of the IMP Amendment area, as documented in the 2022 *Cultural Resource Desktop Review of the PeaceHealth St. Joseph Medical Center Institutional Master Plan Amendment, Bellingham Washington*.

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

The DAHP Statewide Predictive Model recommends an archaeological survey of the area. If archaeological materials are encountered during construction, an archaeologist would immediately be notified, and work halted in the vicinity of the find until the materials can be inspected and assessed in regard to using the National Register of Historic Places criteria. In the event of inadvertently discovered human remains or indeterminate bones, work must stop immediately. Any remains should be covered and secured against further disturbance and communication established with proper law enforcement with jurisdiction, the State Archaeologist or State Historic Preservation Officer (SHPO), and any consulting Tribes. An inadvertent discovery plan will be included in contract documents or work plans.

14. Transportation [\[help\]](#)

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

Vehicular access to the IMP Amendment area, including the West Pavilion, is provided primarily by Birchwood Drive and Squalicum Parkway to/from the northwest and Ellis Street to/from the south. Ellis Street links the IMP Amendment area to Sunset Drive, which in turn connects the area to I-5 at the Mt. Baker Highway Interchange. Figure 1 shows the location of primary streets and highways in the area.

Vehicular access to the public street system is expected to remain the same under the IMP

Amendment proposal as under current conditions.

- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

Transit service to and from the SJMC is provided by Whatcom Transportation Authority (WTA). The nearest public transit stops are in the west SJMC parking lot, along Levin Lane on the east side of the hospital campus, at the Willows Retirement Apartments, and on Squalicum Parkway near Ellis Street. These transit stops all provide access to WTA route 4, offering transit service between the Cordata Station/Park and Ride and the Downtown Bellingham Station.

- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

Current plans show that approximately 20 parking spaces could be eliminated as part of the West Pavilion project. With full buildout of the IMP Amendment proposal, additional parking is anticipated to be required, which may be accommodated through an expansion of an existing parking garage and/or construction of a new parking garage. At this time, the number of stalls to be added has not been clearly identified. A preliminary conservative (low) estimate of net new stalls added would be approximately 200 new parking stalls by 2042.

- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

Under the IMP Amendment proposal, PeaceHealth proposes to make internal circulation improvements on private property to support vehicle, pedestrian, and bicycle mobility between key destinations on the SJMC campus. Circulation and access improvements during the West Pavilion and Phase 1 projects include the following:

- West Pavilion access and drop off improvements
 - Reconfigured vehicular access in the west surface parking lot
 - New covered drop-off lane with increased capacity and bypass lane
 - New/enhanced pedestrian facilities (i.e. new sidewalks, raised crossings, new ADA curb ramps)
 - New/enhanced bus stop location in coordination with Whatcom Transit

Possible future circulation and access improvements include the following:

- Squalicum Parkway Bicycle and Pedestrian Improvements
 - Between Coolidge Drive and the northern entry for St. Joseph Hospital (within the IMP boundaries), bicycle and pedestrian facilities on Squalicum Parkway will be determined and implemented in partnership with the City of Bellingham and in accordance with the latest applicable City of Bellingham Pedestrian and Bicycle Master Plans.
- Squalicum Parkway East Pedestrian Crossing
 - Construct a new marked crosswalk with flashing beacons east of Ellis Street in the vicinity of the hospital east access driveway and Levin Lane. Exact location to be determined at the time of permitting for a future development phase.
- Squalicum Parkway Access Management
 - To improve safety with the potential increases in westbound vehicle queues at the Squalicum/Ellis traffic signal, upon completion of future phase development, conduct monitoring studies in coordination with City staff to evaluate the need for potential left-turn access restrictions on Squalicum Parkway between Ellis Street and Levin Lane.

- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

Development proposed under the IMP Amendment, including the West Pavilion, would not use or occur within 0.25 mile of water or commuter rail. The West Pavilion would include a new

rooftop helipad for use by medical transport helicopters transferring patients to and from the hospital building. An existing helipad on the north side of the SJMC campus would remain in use by medical transport and military helicopters under the IMP Amendment proposal.

- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

With the Phase 1 buildout, including the West Pavilion, approximately 2,500 net new weekday daily trips would be generated.

- Approximately 200 new trips would be generated during the weekday AM peak hour, including 144 inbound trips and 56 outbound trips.
- Approximately 189 new trips would be generated during the weekday PM peak hour, including 62 inbound trips and 127 outbound trips.

With full buildout under the IMP Amendment proposal (including Phase 1 and other potential future projects assuming up to 30,398 additional square feet of medical office space), approximately 3,582 net new weekday daily trips would be generated.

- Approximately 282 new trips would be generated during the weekday AM peak hour, including 210 inbound trips and 72 outbound trips.
- Approximately 282 new trips would be generated during the weekday PM peak hour, including 85 inbound trips and 197 outbound trips.

The AM peak hour is defined as the highest hour between 7 and 9 a.m. The PM peak hour is defined as the highest hour between 4 and 6 p.m. Approximately 1 percent of the traffic is estimated to be trucks on a daily basis.

Trip generation estimates were determined using methodology and trip rates in the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 11th Edition (2021), for Land Use Code (LUC) 610 (Hospital) and LUC 720 (Medical-Dental Office Building). Please see the Transportation Impact Analysis attached to this Environmental Checklist for more information.

- g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

No. The proposal is not expected to affect or be affected by the movement of agricultural and forest products on roads or streets in the area.

- h. Proposed measures to reduce or control transportation impacts, if any:

The City will assess a multimodal Transportation Impact Fee (TIF) at the time that development permits are issued for projects constructed under the IMP (such as the West Pavilion). The City will use TIFs collected from these projects to help fund multimodal transportation system improvements throughout the City.

PeaceHealth will contribute a proportionate share funding contribution (1.8% = \$126,000) toward the \$7.0 million Meridian-Squalicum Pkwy-Birchwood Roundabout Phase 1 Improvement project (City Transportation Improvement Program Project #15).

15. Public Services [\[help\]](#)

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

The IMP Amendment proposal, including the West Pavilion, is not expected to increase the need for public services (e.g., fire, police, public transit, health care, or schools). The projects associated with the IMP Amendment proposal would provide additional health care services for the community. The proposed West Pavilion rooftop helipad would benefit emergency service providers by eliminating the need for an ambulance, as the patient would move directly from the helicopter onto a gurney, and down the elevator to the emergency department. The rooftop helipad also would reduce other potential delays and free up EMT crews to respond to calls in the community.

Traffic rerouting, lane closures, and construction traffic may affect emergency response times and the travel times or routes for public service vehicles during construction periods. However, as part of construction planning and permitting, PeaceHealth and the City of Bellingham would work to minimize the duration and impact of lane closures and reductions by (a) maintaining through traffic, where practical, (b) establishing detour routes on nearby arterials for temporary lane closures; and (c) maintaining traffic management systems.

- b. Proposed measures to reduce or control direct impacts on public services, if any.
Construction activities could temporarily disrupt access and existing transportation circulation patterns on the SJMC campus. Response times for fire, police, and emergency responders are expected to experience minimal, if any, delays. No measures to reduce or control impacts are required.

16. Utilities [\[help\]](#)

- a. Circle utilities currently available at the site:
electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other _____.
- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

The proposed new development under the IMP Amendment, including the West Pavilion would include utility demands typical of inpatient hospital, outpatient clinic and medical office use. The proposal will construct various utility connections including sanitary sewer (City), fire water (City), domestic water (City), natural gas (Cascade Natural Gas Corporation), electricity (Puget Sound Energy), stormwater drainage (Private), and telecommunications (may include Verizon, Comcast, CenturyLink, and others). The construction activities necessary to install the utility services will include trenching throughout the SJMC Campus and within City of Bellingham public right of ways.

C. Signature [\[HELP\]](#)

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



Signature:

Name of signee Karissa Kawamoto

Position and Agency/Organization Senior Environmental Planner, WSP

Date Submitted: 1/17/2023

D. Supplemental sheet for nonproject actions [\[HELP\]](#)

(IT IS NOT NECESSARY to use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

The IMP Amendment proposal would not increase long-term discharges to water; emissions to air; and production, storage, or release of toxic or hazardous substances; and production of noise. There would be temporary increases in dust, exhaust emissions, and noise during construction activities.

Proposed measures to avoid or reduce such increases are:

The proposal will conform to the applicable federal, state, and local regulations and standards for water quality and stormwater management, air quality, hazardous materials management, and noise during construction and operations.

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

The IMP Amendment proposal would be unlikely to affect plants, animals, fish, or marine life. The proposal is primarily located in developed areas and would result in a similar amount of overall vegetation to existing conditions. Use of wildlife habitat is limited throughout the IMP Amendment area by the presence of the built environment and the lack of habitat features in the immediate vicinity. No development is proposed in the immediate vicinity of Squalicum Creek and no direct or indirect impacts are anticipated to fish.

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

No in-stream work within Squalicum Creek would occur under the proposed IMP Amendment, and the wetland buffer will be maintained. The natural vegetation in the northern portion of the IMP Amendment area (the Zone 3 area immediately south of the former Bug Lake) will be retained and would continue to provide wildlife habitat. IMP Section IV.F includes standards for new landscaped areas.

3. How would the proposal be likely to deplete energy or natural resources?

The IMP Amendment proposal is not anticipated to deplete energy or natural resources.

Proposed measures to protect or conserve energy and natural resources are:

The IMP Amendment proposal would adhere to applicable provisions of the State of Washington Energy Code and would comply with the City of Bellingham Public Works' Development Guidelines and Improvement Standards Manual.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

The IMP Amendment proposal would have no use of or effects on parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands.

Proposed measures to protect such resources or to avoid or reduce impacts are:

No mitigation measures are proposed because no impacts to the above listed resources would occur.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

The IMP Amendment proposal would not change land uses under the existing IMP and would not allow or encourage land uses incompatible with existing plans. A portion of the northern section of the IMP Amendment area is within the Shoreline Master Plan jurisdiction because it is within 200 feet of Squalicum Creek. However, no development within this shoreline jurisdiction is proposed.

Proposed measures to avoid or reduce shoreline and land use impacts are:

The IMP Amendment proposal is being developed in accordance with the City's Comprehensive Plan and Municipal Code; therefore, no additional measures are proposed to avoid or reduce land use impacts. No shoreline impacts would occur under the proposal; therefore, no additional measures are proposed.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

The transportation analysis prepared for the IMP Amendment proposal indicates that the existing roadway system is sufficient to handle the increased traffic demands generated by IMP Amendment development for the AM and PM peak hours during the analysis study years of 2032 and 2042. Response times for emergency responders are expected to experience minimal, if any, delays during construction. The proposed new development under the IMP Amendment would include utility demands typical of inpatient hospital, outpatient clinic and medical office use, and buildings would include energy conservation measures as appropriate.

Proposed measures to reduce or respond to such demand(s) are:

See transportation analysis (Section #14) for details on improvements and monetary contributions toward planned City projects that will respond to increased demands on transportation.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

The IMP Amendment proposal will not conflict with any local, state, and federal laws or requirements for the protection of the environment.

Purpose

1. PeaceHealth, in partnership with the City of Bellingham, is amending the Cornwall Park Neighborhood Area 7 Updated IMP to meet the growing health care needs of the regional community.
2. Patient health and safety is of the utmost importance to PeaceHealth and to the City of Bellingham.
3. Federal Aviation Administration (“FAA”) regulations require improvements to the existing helipad.
4. Additional changes to the helipad are necessary to ensure the best patient outcomes possible.
5. A supplemental helipad located on top of the planned West Pavilion will better serve patients because it will reduce the amount of time needed to transfer patients from the helipad to the Emergency Department, enhancing safety and improving patient outcomes.

New Guidelines

In recognition of the foregoing, the Parties agree to the following Guidelines:

- A. Preferred Flight Path: Helicopter operators will attempt to use the “cone” flight path delineated in **Exhibit A**, except when at the reasonable discretion of the helicopter operator, an alternative path is necessary due to weather, safety, condition of patient, or other operational concerns.
- B. Helicopter Operators shall use safe operating procedures as required by the FAA and governed by federal law.
- C. PeaceHealth-related use of the helipads shall only be used for emergency and required patient transfer purposes.
- D. Follow and adhere to all additional mitigation measures as may be appropriately established by the City during the specific environmental review process for the West Pavilion and rooftop heli-pad.

Enforcement

Enforcement of these Guidelines shall be in the same manner as Code Enforcement in Bellingham Municipal Code 20.50.010.

