



March 4, 2021

Ms. Kathy Bell
Planning and Community Development Department
City of Bellingham
210 Lottie Street
Bellingham, WA 98225

Subject: CityView
Response to July 6, 2020 Request for Information

Dear Kathy:

This letter provides a response to your comments relating to civil design and stormwater management in your July 6, 2020 *Request for Information* regarding the subject project.

Following is a point-by-point response to the Request for Information:

Critical Areas Comment No. 3

BMC 16.55.460.A.4 prohibits removal of vegetation from an erosion or landslide hazard area or buffer unless otherwise approved. The city anticipates that some of the development footprint clearing will be in an erosion hazard; no clearing is planned for the landslide hazard. The seasonal restrictions limit clearing between May 1st and September 30th. Much of the public comment, as well as statements in the geohazard report, is about surface and groundwater drainage once the development site is cleared of vegetation.

Action Item: *The project geologist and engineer should provide specific BMPs for timing of the site clearing and grading. In addition, they should recommend measures to mitigate onsite and offsite drainage problems and make recommendations for the management of large volumes of excavated materials (stockpiling, transport, erosion control, etc.).*

Comment Response

The Preliminary Stormwater Site Plan (SSP), specifically Section 5.2 *Minimum Requirement #2: Construction Stormwater Pollution Prevention*, has been revised to address this comment. A preliminary Temporary Erosion and Sediment Control (TESC) plan is provided in the SSP's Figure 4, with accompanying site cross sections and TESC information provided in Figure 5. These figures show the type and location of typical BMPs that can be used during project construction. These BMPs provide recommended measures that will mitigate potential onsite and offsite drainage problems.

Critical Areas Comment No. 4

Preliminary Stormwater Site Plan (SSP). The SSP includes past studies and development proposals. Though some of the geologic information is the same, the SSP should include the geohazard report done for this proposal. Similarly, the project referenced (Figure 2) should be for the current proposal, not an earlier version.

According to the geohazard report, the primary erosion hazard at the site is from temporary conditions created during construction. The SSP report recommends that temporary erosion control measures should be used during construction depending on the weather, location, soil/rock type, and other factors. Public comments based on local observations express concerns about an increase in drainage problems on downslope properties.

Action Item: *The project geologist and project engineer should collaborate to devise site specific BMPs to control surface and groundwater runoff during and after construction. Provide a section in both the geohazard report and the SSP that address BMC 16.55.440.A.2.i. "An analysis of proposed surface and subsurface drainage, and the vulnerability of the site to erosion." [Note: This section of the BMC is part of the request under the second action item under "Critical Area" above.]*

Comment Response

The SSP, specifically Section 5.2 Minimum Requirement #2: Construction Stormwater Pollution Prevention and Section 5.4 Minimum Requirement #4: Preservation of Natural Drainage Systems and Outfalls, have been revised to address this comment. A preliminary Temporary Erosion and Sediment Control (TESC) plan is provided in the SSP's Figure 4, with accompanying site cross sections and TESC information provided in Figure 5. These figures show the type and location of typical BMPs that can be used during project construction. These BMPs provide recommended measures that will mitigate potential onsite and offsite drainage problems. As discussed in the SSP, these measures are also anticipated to reduce the amount of surface and subsurface flow that travels down the hillside.

Planned Development Comment No. 3

BMC 20.38.050 (B)(12) Comprehensive Plan Elements. The Parks, Recreation & Open Space (PRO) Plan chapter of the comprehensive plan identifies a trail corridor in the Consolidation Avenue right of way. The application proposes to fulfill this provision by constructing a trail from the Nevada/Consolidation intersection east to Puget Street. The PRO Plan identifies this trail segment terminating at the Puget/Consolidation intersection. The entire length of Puget Street abutting the site lacks pedestrian and bicycle facilities and is not a suitable location for the terminus of a multimodal trail.

The trail's termination on Puget Street does not fulfill the intent of the PRO Plan to provide a continuous trail network or a safe connection to the Samish Crest Trail neighborhood connectors at the Byron/47th Street intersection. If stairs are proposed as part of this trail, the stairs should include a bike ramp (stramp) so that bicyclists coming from the Nevada St. bike boulevard and many of the other recreational opportunities in the area may utilize the trail connection.

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SEPA Checklist Comment No. 1

In response to public comment and reports submitted with the application materials, the responses to the following SEPA checklist questions requires additional information that may also require revisions and/or additional mitigating conditions to adequately determine the proposal does not have a significant environmental impact:

Water-3. C. 3) and 4) -Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site?

Action item: *Please have a qualified professional respond to how the drainage courses of the surface flow, underground flow and onsite springs will be affected as a result of this development. Then address proposed measures to reduce or control the impacts. This is also further discussed above under the critical areas section of this document.*

Comment Response

The SSP, specifically Section 5.4 *Minimum Requirement #4: Preservation of Natural Drainage Systems and Outfalls*, has been revised to address this comment. Section 5.4 discusses how the permanent stormwater system is anticipated to result in a reduction in the amount of surface and subsurface flow down the hillside and into the backyards of the homes fronting Nevada Street.

We trust this response answers your questions. Please contact our office with any additional questions you may have.

Sincerely,
CASCADE ENGINEERING GROUP, P.S., INC.

Craig R. Parkinson, P.E.
Principal Engineer

Cc: Mr. Morgan Bartlett