

## **CHAPTER 1. INTRODUCTION**

### **1.1 Introduction**

Greenbriar Northwest Associates is proposing to develop a property located in the South Bellingham neighborhood of the City of Bellingham at the 1600 block of Chuckanut Drive. This area is referred to by some as “Chuckanut Ridge” or the “One-Hundred Acre Wood.” The proposal, which is called Fairhaven Highlands, includes construction of 739 residential units and a 4,000-square-foot clubhouse on approximately 82 acres of land. The proposed residential units would be a mix of single-family and multi-family. The proposal would also include installation of infrastructure including roads, stormwater facilities, and water, sewer, and natural gas lines. This Environmental Impact Statement (EIS) evaluates seven development alternatives and one alternative in which the site would not be developed.

#### **1.1.1 Purpose of the EIS**

The purpose of this EIS is to identify and evaluate probable significant and adverse environmental impacts that could result from development of the project site under various alternatives. The EIS also identifies measures that could mitigate those impacts. This document is intended to ensure that environmental impacts and mitigation measures for the proposed development alternatives are disclosed to the public, agencies, decision makers, and other interested parties. It evaluates the long-term direct and indirect impacts of the development alternatives, as well as short-term construction-related impacts.

This EIS has been prepared in compliance with the State Environmental Policy Act (SEPA), Chapter 43.21C of the Revised Code of Washington (RCW); the state SEPA rules in Chapter 197-11 of the Washington Administrative Code (WAC); and Bellingham’s Environmental Procedures Ordinance in Chapter 16.20 of the Bellingham Municipal Code (BMC). The SEPA process enables the City of Bellingham, other interested agencies, and citizens to review and comment on the proposed alternatives. The EIS consolidates information on environmental impacts that will be considered in the decision-making process for permits related to Fairhaven Highlands.

The first step in the EIS process is to prepare a Draft EIS. In accord with WAC 197-11-455, comments on a Draft EIS may be received for 30 days, but an extension of 15 days may be granted if requested in writing. Requests to allow such an extension were received prior to issuance of the Draft EIS, therefore the Director has determined that the public will have 45 days to comment on the Draft EIS. The second step is to prepare a Final EIS. The Final EIS will consist of a fact sheet, summary, description of alternatives, and responses to Draft EIS comments. If appropriate, the Final EIS will also include a section addressing additions, corrections, and clarifications. The third step is for the SEPA Responsible Official to take action on the permits the applicant applied for in 2005. Action may not occur sooner than seven days after the Final EIS has been issued.

### **1.1.2 Fairhaven Highlands**

The property proposed for development is composed of six to seven parcels, depending on the development alternative. The majority of the development, including all residential structures, is located on five parcels owned by Greenbriar Northwest Associates, LLC. Connecting roadways are located on one or two parcels owned by the City of Bellingham. The site is currently an undeveloped, forested property. Historically, it was logged and mined for gravel. An abandoned gravel pit is located in the northwestern portion of the property. The old roadbeds developed during logging and mining are currently used as trails by pedestrians, cyclists, and horse riders without the explicit permission of the property owner. Land uses surrounding the project site consist of Fairhaven Park to the north (City of Bellingham Parks and Recreation Department, 2005) and single-family homes to the west and south. To the east is a mix of single-family homes and undeveloped property owned by the City and private owners (City of Bellingham Planning Department, 2006b).

The property has a zoning designation of Planned Residential Multi (City of Bellingham Planning Department, 2006d) (which allows development of both single and multi-family residential uses) and a Comprehensive Plan designation of Residential Multi (City of Bellingham Planning Department, 2006c). It is located in the South Bellingham neighborhood. The surrounding zoning is Residential Single to the south and west, Planned Residential Multi to the north, and Public, Residential Single, and Planned Residential Multi to the east (City of Bellingham Planning Department, 2006a; 2006d).

## **1.2 Summary of Alternatives**

Chapter 197-11-440(5) WAC requires that an EIS discuss the proposal and reasonable alternatives including the “No Action” alternative. The reasonable alternatives must include actions that could feasibly attain or approximate a proposal’s objectives, but at a lower environmental cost or decreased level of environmental degradation.

This EIS evaluates seven development alternatives and a No Action Alternative. All alternatives except the No Action Alternative have the same total number of residential units. The mixture of housing types (single-family, townhouse, condominium/apartment building) differs among the alternatives. All alternatives except the No Action Alternative would include a 4,000-square-foot clubhouse serving residents of the development. The major differences among the alternatives are the internal roadway layout, vehicular access to and from the site, size of wetland buffers, and amount of development coverage.

Table 1-1 provides a summary of the development alternatives evaluated in this EIS.

Table 1-1. Summary of Development Alternatives, Fairhaven Highlands

	<i>Single-family units</i>	<i>Townhouse/ condominium units</i>	<i>Maximum height of apartment buildings (stories)</i>	<i>Fill in wetlands (square feet)<sup>1</sup></i>	<i>Development in city regulated wetland buffers (square feet)<sup>1,2</sup></i>	<i>Emergency-only access roadways</i>	<i>Access roadways</i>	<i>Other</i>
<b>Alternative 1A</b>	181	558	10	33,000	191,000	Two (one on Chuckanut Drive opposite 16th Street and one on 22nd Street)	One via Chuckanut Dr.	Based on 2005 application
<b>Alternative 1B</b>	Same as Alternative 1A	Same as Alternative 1A	10	Same as Alternative 1A except that there are additional wetland impacts associated with bridge replacement that have not been quantified	Same as Alternative 1A except that there are additional wetland impacts associated with bridge replacement that have not been quantified	Same as Alternative 1A	Same as Alternative 1A	This is the only alternative that includes widening Fairhaven Bridge by two lanes.
<b>Alternative 1C</b>	181	558	10	34,000	263,000	One via Chuckanut Dr opposite 16th Street	Two (one via Chuckanut Dr and one via 24th St)	This alternative would disturb or develop the largest amount of native vegetation of all the development alternatives.
<b>Alternative 2A</b>	17	722	5	24,000	65,000	Two (one via Chuckanut Dr opposite 16th Street and one internal road connecting the southeast portion of the site with the northeast portion of the site)	One via Chuckanut Dr.	This alternative would disturb or develop the least amount of native vegetation and wetland area of all the development alternatives.
<b>Alternative 2F</b>	17	722	5	25,000	67,000	None	Two via Chuckanut Dr. (opposite Viewcrest Road and 16th St.)	
<b>Alternative 3D</b>	17	722	5	26,000	115,000	None	Three access roadways to the site; two via Chuckanut Dr. (opposite Viewcrest Rd. and 16th St) and one via 24th St.	This alternative would retain the largest contiguous undisturbed area on site.
<b>Alternative 4F</b>	51	688	5	26,000	108,000	None	Two via Chuckanut Dr (opposite Viewcrest Rd. and 16th St.)	

<sup>1</sup> All numbers are rounded.

<sup>2</sup> City Regulated wetland buffers refers to minimum buffers associated with wetlands considered regulated by the Bellingham Municipal Code Chapter 16.50. See Section 3.4.3 Plant and Animals for more information.



### **1.3 Summary of Major Conclusions**

This section provides an overview of the major conclusions that can be drawn from the EIS.

One major outcome of the EIS process has been a significant change in the applicant's preferred site plans, as well as a better understanding of the impacts of various alternatives that the City chose to explore. These conclusions are discussed in the Section 1.3.1, Range of Alternatives.

This Fairhaven Highlands proposal would convert a forested site to a residential development at a density well above the average density for the neighborhood and also above the density of the city as a whole. The EIS shows that there could be significant impacts associated with this conversion of land use, but also highlights that there are significant policy tradeoffs in environmental impacts. One of the major findings of the Fairhaven Highlands EIS is that the reduction of one type of impact can increase impacts of another sort. The most significant of these tradeoffs are discussed below in section 1.3.2, Major Tradeoffs. At the end of this section, impacts from all alternatives are summarized in a table.

#### **1.3.1 Range of Alternatives**

The site plan alternatives for this EIS were developed primarily by the applicant and the City has not indicated a preferred alternative in the EIS. Alternative 1A was the original application submitted in 2005. It did not include either of the transportation "prerequisite considerations" required by the Code and these were added to the scope of the EIS as Alternatives 1B and 1C. Prerequisite considerations are recommendations that must be addressed by the SEPA Responsible Official in conjunction with any proposal not exempt from SEPA.

Alternative 1B is the only alternative that considers the widening of Fairhaven Bridge, a prerequisite consideration. Widening of the bridge would have modest benefits from a transportation standpoint, but would likely be extremely expensive, have significant displacement impacts on properties adjacent to the existing roadway, and would require replacement or significant modification of a structure that has historic and aesthetic value.

Alternatives 1C and 3D include the 24<sup>th</sup> Street Connector, a prerequisite consideration. This transportation improvement would change the circulation pattern of the neighborhood and has several other significant tradeoffs that are discussed below.

After the City had determined that an EIS would be required, but before the public scoping meeting was held, the applicant created a new alternative designed to reduce environmental impacts, Alternative 2A. Alternative 2A has also been called the Enhanced Buffer Alternative because it provides larger wetland buffers on average than does Alternative 1A. The applicant has indicated a preference for Alternative 2A, or one of the variations on it, either 2F or 4F, having recognized that the enhanced buffer alternatives accomplish the same overall density on the site with fewer environmental costs and risks. As such, although Alternative 1A stands as the original proposal, decision-making can reasonably be focused on the other alternatives than 1A, which is among the alternatives with the greatest impacts.

Alternative 3D was developed at the City's request in response to a suggestion during scoping to include an alternative that maintains the forested buffer between two of the largest wetlands,

wetlands CC1 and KK, which are hydrologically connected as well. The applicant expressed concern that this alternative would split the development into two separate developments, isolating the southern portion from the northern portion where most of the shared community facilities are proposed. However, the two parts of the development would still be connected by a road and pedestrian walkways and would be no further apart than under the other alternatives, so the City included it as being generally consistent with the applicant's objectives.

Also as a request of the public scoping process, the City was asked to seriously consider the No Action Alternative as more than a baseline for comparing different levels of impacts. The No Action Alternative would be the result if the City denied the application for development of this property. This, too, involves significant tradeoffs that should be considered, and that are discussed below.

### **1.3.2 Major Tradeoffs**

There are several policy tradeoffs presented by the application to develop the Fairhaven Highlands project. At the regional scale, there is a tradeoff between preserving open space and preventing sprawl. At the neighborhood scale, there are tradeoffs between preserving neighborhood character and addressing transportation needs. And at the site level, tradeoffs involve avoiding sensitive areas and providing adequate and appropriate transportation infrastructure to serve the project.

#### ***1.3.2.1 Preserving Open Space and Preventing Sprawl***

The Fairhaven Highlands project site is 82 acres, which constitutes approximately 48 city blocks on Bellingham's street grid. If developed as proposed with 739 units of housing, it could house approximately 1.3 percent of the city's 2022 population, and 5 percent of the growth projected for Bellingham through that year. It is also a large, forested open space (over twice the size of the adjacent Fairhaven Park, an active recreational park) that contains sensitive natural resources, and that provides a scenic natural edge within the fabric of the city.

All of the development alternatives would avoid development of most of the wetlands and steep slopes on the site, resulting in 31 to 42 acres (33 to 51 percent) of the site remaining in largely undisturbed open space depending on the development alternative. Each alternative would also provide a small amount of developed area for passive and active recreation for residents of the development. Thus, the loss of open space is partly quantitative and partly qualitative. The remaining open space would not be as extensive or contiguous, would be primarily wetlands and wetland buffers, and would have a larger human population living in close proximity to it than the existing open space. With the removal of vegetation and development outside of the wetland buffers, there would be significant impacts on terrestrial wildlife habitat that are unavoidable.

If the project was not approved and the site was not developed, the visual character of the area would remain intact, as would the habitat functions and other ecological values of the site, so long as the forest on the site remains. Because of the limited residential land supply within Bellingham, the environmental tradeoff is that population growth projected to be accommodated in Bellingham could occur instead in nearby towns or in unincorporated areas of the county. This unplanned growth would carry its own environmental costs, most of which are not

characterized in the EIS because they are speculative and largely unpredictable. One of the effects of potential sprawl is discussed in the section on Air and Climate (Section 3.2). The discussion of greenhouse gas emissions in that section suggests that the impact of having people driving to jobs in Bellingham from nearby towns instead of from Fairhaven Highlands could be greater than the greenhouse gas benefit of preserving the forest on the site. Greenhouse gas sequestration is not the only ecological value of a forest, and is just one dimension of the issue of suburban sprawl. The costs of providing transportation and other infrastructure and the use of resource lands in other locations are some of the other less predictable costs that need to be considered. Adding to the complexity of the issue and outside the scope of this EIS, the City may choose to examine alternative ways of accommodating growth within its boundaries should the No Action Alternative be selected.

### ***1.3.2.2 Local Transportation Needs and Neighborhood Character***

The alternatives include two (Alternative 1C and 3D) that have a new collector arterial passing through the project site; although, Alternative 3D is not designed to City arterial standards. The 24th Street Connector is a long-considered route that would bypass congested intersections on Old Fairhaven Parkway, 12th Street, and Chuckanut Drive. This road would carry both project and non-project traffic to and from the freeway interchange on Old Fairhaven Parkway, with a total of approximately 400 more cars using the portion of 24th Street south of Old Fairhaven Parkway during the PM peak hour than would use that road segment under the No Action Alternative.

The addition of this roadway would reduce the impacts of the development on some intersections and broaden the city street network providing more options for vehicular and non-motorized travel. It would also change the quiet residential character of 24th Street, which currently does not have continuous sidewalks. Most of the additional traffic would cross the Interurban Trail, which would pose conflicts with trail users, if the intersection is on the same grade level as the trail.

### ***1.3.2.3 Critical Areas and Infrastructure***

Environmentally critical areas cover almost the entire site. The flattest areas on the site are either wetlands or would need to be set aside as wetland buffers. Most of the remainder of the site contains erosion-prone soils that have slopes of 15 percent slope or more, steep enough to heighten concerns about erosion potential, and some limited areas are considered landslide-prone.

The evaluation of various road and lot configurations in the EIS show that additional roads provide a traffic benefit at the site entrances, as well as at some more distant intersections in the study area discussed above. Alternatives with two entrances provide better level of service than those with only one, and Alternative 3D, with three entrances, provides the best overall traffic level of service in the study area of all development alternatives.

However, alternatives with two entrances generally would have more wetland and wetland buffer impacts than Alternative 2A, which has just one entrance. The difference in impacts on wetlands of developing emergency access roads versus fully developed roads is relatively small, but fully

developed roads would generally require more disturbance. Alternative 2F would have the least overall impact on wetlands and wetland buffers.

Sensitive areas could also be significantly affected by the stormwater infrastructure proposed. Historically, urbanization has significantly altered hydrology and often resulted in unintended downstream effects. The stormwater management system proposed for the site is intended to adhere to the best available guidance for maintaining wetland hydrology and avoiding adverse impacts to slopes. However, there is one significant difference between the existing hydrology and the system proposed. The existing hydrology operates with virtually no human management or monitoring and maintains wetlands in the upper portion of two drainages while producing very little, if any, surface runoff. In order to ensure that the proposed system would operate as well as the existing hydrology would require significant and sustained commitment to managing and monitoring.

Failure of the stormwater system on this site could result in erosion, sedimentation of wetlands, and off-site flooding. Adding to the uncertainty is that climate change experts consider it likely that this region will experience an increase in rainstorm intensity over the next few decades. The shift to reliance on human-managed stormwater hydrology is a risk that is typical with urbanization, although some of the risk has been reduced by advances in science and technology. In any case, these uncertainties serve to underscore the importance of adaptive management methods and a design that can be adapted to changing climate conditions and unanticipated effects of the managed system. Alternatives that leave more open space may be more adaptable than those that encumber more land with buildings, roads, and other features that would be difficult or impossible to modify in the future, should the need arise.

### **1.3.3 Impacts Summary Table**

Table 1-2 summarizes impacts of all alternatives. This table is not intended to quantify or list all impacts, but provides an overview of the general impacts relative to each alternative. Quantities and acreage have been rounded in Table 1-2.

**Table 1-2. Comparison of Impacts for Alternatives, Fairhaven Highlands**

	<i>No Action Alternative</i>	<i>Alternative 1A</i>	<i>Alternative 1B</i>	<i>Alternative 1C</i>	<i>Alternative 2A</i>	<i>Alternative 2F</i>	<i>Alternative 3D</i>	<i>Alternative 4F</i>
<b>Earth, Soils, Geology</b>	Some shallow sloughing of oversteepened slopes would continue to occur in the north central portion of the site.	Site contains steep slopes, landslide hazard areas, erodible soils, wetlands fed by subsurface flow, and is in a region that is seismically active.  Some construction is proposed in areas that would be hazardous.  Standard erosion control measures should be required during construction.  Blasting required for removal of bedrock would not harm adjacent properties or slope stability.  Around 230,000 cubic yards of soil would be excavated and 110,000 cubic yards of soil would be used for fill, with a net off-site export of 120,000 cubic yards.  Stormwater management methods would avoid impacts to erodible soils and slope stability.  No significant impacts are expected if mitigated with best management practices.	Impacts on the site would be the same as Alternative 1A.  Construction of the widened Fairhaven Bridge would occur over steep slopes and Padden Creek.  It is unlikely that the additional lanes could be supported by the existing bridge so a new structure would likely be required.  No significant impacts are expected if mitigated with best management practices.	Impacts on the site would be the same as Alternative 1A, except that construction of the 24th Street Connector would involve additional grading in wetland buffers and steep slope areas. During design, provision would be needed to ensure that groundwater and surface water feeding Wetland JJ2 can move under the roadway.  No significant impacts are expected if mitigated with best management practices.	Impacts on the site would be similar to Alternative 1A except that less of the site would be disturbed, fewer buildings and roads and no stormwater ponds would be constructed in steep slopes.  Around 200,000-210,000 cubic yards of soil would be excavated and around 60,000-70,000 cubic yards of soil would be used for fill, with a net off-site export of 140,000 cubic yards.  No significant impacts are expected if mitigated with best management practices.	Impacts would be the same as Alternative 2A, except that slightly more grading may be needed for the expanded roadway at the 16th Street entrance.  No significant impacts are expected if mitigated with best management practices.	Impacts would be the same as Alternative 2A, except that more grading may be needed for the 24th Street Connector (see Alternative 1C) and expanded roadway at the 16th Street entrance.  No significant impacts are expected if mitigated with best management practices.	Impacts would be the same as Alternative 2F, except that more clearing and grading may be needed for single family development in the southern portion of the site.  No significant impacts are expected if mitigated with best management practices.
<b>Air and Climate</b>	No air quality impacts.  No greenhouse gas emissions.  Property would continue to sequester carbon.	Temporary air quality impacts related to construction would be more than Alternatives 2A, 2F, 3D, and 4F.  At project build-out, air emissions would result primarily from 5000 daily vehicle trips from the project. Air emissions would not cause the region to exceed National Ambient Air Quality Standards.  Greenhouse gas emissions would also be produced by the project as a result of embodied emissions from construction materials (extracting, processing, transporting, constructing and disposing building materials); energy use associated with building operation; and vehicle use by residents.  Greenhouse gas emissions would be more than Alternatives 2A, 2F, 3D, and 4F.  There would be a greater loss of sequestered carbon from forest removal than Alternative 2A, 2F, 3D, and 4F.	Temporary air quality impacts would be similar to Alternative 1A. After construction, congestion would be reduced slightly by the addition of lanes at Fairhaven Bridge, which would proportionally reduce air emissions from idling or slow moving vehicles compared to Alternative 1A.  Greenhouse gas emissions would be slightly more than Alternative 1A due to bridge construction.  Loss of sequestered carbon would be the same as Alternative 1A.	Temporary air quality impacts would be more than the other development alternatives since a larger area would need to be cleared and graded to accommodate the project.  At total project build-out, air quality impacts would be similar to Alternative 1A.  Highest amount of greenhouse gas emissions.  Largest loss of sequestered carbon from forest removal.	Temporary air quality impacts would be considerably less than Alternatives 1A-1C due to less clearing and grading.  Approximately 4,390 daily vehicle trips would be generated with commensurate emissions.  Greenhouse gas emissions would be much less than under Alternatives 1A-1C.  After the No Action Alternative, Alternative 2A would sequester the largest amount of carbon.	Air quality impacts relating to construction would be similar to Alternative 2A.  At build-out, air quality impacts from traffic would be slightly less than Alternative 2A because traffic volumes would be lower with a second access along Chuckanut Dr.  Greenhouse gas emissions would be slightly more than under Alternative 2A.  Slightly more carbon sequestration would be lost from forest removal than under Alternative 2A.	Temporary air quality impacts would be somewhat more than Alternatives 2A and 2F as a result of more clearing and grading for the 24th Street Connector.  Air emissions from project related traffic would be similar to Alternative 2A.  Greenhouse gas emissions would be slightly more than under Alternative 2F.  Slightly more carbon sequestration would be lost from forest removal than under Alternative 2A.	Temporary air quality impacts would be somewhat less than Alternative 1A but more than Alternatives 2A, 2F, and 3D.  Similar to other development alternatives, air emissions are expected to be highest during high volume periods and in locations where traffic is congested, with vehicles idling or moving slowly. Approximately 4,520 daily vehicle trips would be generated with commensurate emissions.  Lowest amount of greenhouse gas emissions.  Greater loss in carbon sequestration than Alternatives 2A, 2F, and 3D but still less than Alternative 1 (A-C).

	<i>No Action Alternative</i>	<i>Alternative 1A</i>	<i>Alternative 1B</i>	<i>Alternative 1C</i>	<i>Alternative 2A</i>	<i>Alternative 2F</i>	<i>Alternative 3D</i>	<i>Alternative 4F</i>
<b>Water Resources</b>	There would be no impacts as long as the forest remains intact.	<p>Alternative 1A would reduce forest cover from existing 92% to 26% of the site. Alternative 1A will result in approximately 29 acres of impervious surface, covering 35 percent of the site. These changes will increase the volume of water that will run off as surface flow during storms. The amount of forest reduction and impervious surface are well into ranges that, if unmitigated, are known to degrade downstream ecosystems.</p> <p>Alternative 1A would include the installation of pollutant generating impervious surfaces and landscaping. Both land cover types can increase pollutant loading to downstream aquatic resources. Without mitigation, the increase in pollutant loading could exacerbate existing temperature, dissolved oxygen, and fecal coliform issues in Padden and Chuckanut Creeks.</p> <p>Alternative 1A would also result in a reduction of wetland area from 8 to 7% of the site.</p>	<p>Impacts resulting from Alternative 1B are expected to be very similar to Alternative 1A.</p> <p>There will be increased impervious surfaces associated with the bridge widening, which would also modify runoff and drainage at the bridge location.</p>	<p>Impacts are expected to be similar to Alternative 1A.</p> <p>There will be increased impervious surfaces and greater forest loss (approximately 2.7 acres) associated with the 24th Street Connector, which also has the potential to impact an off-site wetland.</p>	<p>Reduction in forest cover from 92% to 42% and installing approximately 20.5 acres of impervious surface would result in impacts similar to, but less severe than, those described for Alternative 1A.</p> <p>Alternative 2A would result in less direct wetland impact than Alternative 1A.</p>	<p>Impacts are expected to be very similar to those described for Alternative 2A.</p>	<p>Alternative 3D results in the greatest percentage of remaining forest cover of the development alternatives, but overall is similar to Alternative 2A (43 versus 42 percent, respectively.)</p>	<p>Impacts are expected to be greater than those described for Alternative 2A and less than those described for Alternative 1A.</p> <p>Alternative 4F would result in a reduction of forest cover from 92% to 30%, with approximately 21 acres of installed impervious surface.</p> <p>Alternative 4F would also result in less direct wetland impact than Alternative 1A</p>

	<i>No Action Alternative</i>	<i>Alternative 1A</i>	<i>Alternative 1B</i>	<i>Alternative 1C</i>	<i>Alternative 2A</i>	<i>Alternative 2F</i>	<i>Alternative 3D</i>	<i>Alternative 4F</i>
<b>Plants and Animals</b>	<p>No wetland or wetland buffer impacts would occur and project area wetlands would continue to perform current functions. Wildlife habitat and connectivity would remain as is. Noise, light and human activity levels would not change from current levels.</p>	<p>Alternative 1A would result in 33,000 square feet of impact to wetlands and 191,000 square feet of impact to wetland buffers that would affect the current level of water quality improvement, hydrologic and wildlife habitat functions performed by wetlands in the project area.</p> <p>Alternative 1A would remove 56 acres of existing mixed coniferous and deciduous forest in the project area (includes both on-site and off-site impacts). Wildlife species using the forest would be directly impacted, displaced and/or disturbed.</p> <p>Roads and buildings would result in the fragmentation of existing well-connected upland and wetland habitats. Fragmentation is likely to increase edge specialist wildlife species and decrease species associated with interior forest or specialist species.</p> <p>The native vegetation remaining on site would cover 27 acres. Alternative 1A may not provide sufficient habitat to maintain most bird populations and some mammal species. Amphibian populations and diversity are anticipated to be altered under this alternative.</p> <p>Alternative 1A would have the greatest impacts to pileated woodpecker, the only special status species documented on site, and would affect other priority wildlife species (great blue heron, Townsend's big eared bat, merlin).</p> <p>Alternative 1A would not meet the buffer recommendations of 75 feet or greater to reduce windthrow adjacent to retained wetlands on site. Wetlands would be exposed to greater risk, which may alter their current ecology, particularly Wetland CC1.</p> <p>Impacts to wildlife from light, noise and human activity would be the greatest under Alternative 1A where buffers are 50 feet.</p>	<p>Impacts would be the same as Alternative 1A.</p> <p>Expansion of Fairhaven Bridge may affect potential wetlands associated with Padden Creek.</p>	<p>Impacts would be greater than Alternative 1A.</p> <p>Impacts to wetlands would be 34,000 square feet and impacts to wetland buffers would be 263,000 square feet.</p> <p>Construction of the 24th Street Connector immediately off-site would involve an additional 71,000 square feet of fill in the buffer of Wetland JJ2.</p> <p>Alternative 1C would remove 59 acres of forest in the project area (includes both on-site and off-site impacts).The amount of remaining vegetation on-site would be the same as Alternative 1A.</p> <p>The 24th Street Connector would limit wildlife movement north of Wetland JJ1 and JJ2.</p>	<p>Alternative 2A impacts are similar to, but less severe than Alternative 1A.</p> <p>Impacts to wetlands would be 24,000 square feet and impacts to wetland buffers would be 65,000 square feet.</p> <p>Alternative 2A would remove the least amount (42 acres) of forest habitat of all the alternatives, resulting in the least impacts to pileated woodpecker and other priority wildlife species. The amount of remaining vegetation on-site would be 41 acres.</p> <p>Larger buffers would reduce windthrow adjacent to retained wetlands for better protection.</p> <p>Impacts to wildlife from light, noise and human activity would be reduced compared to Alternative 1A.</p>	<p>Impacts would be similar to Alternative 2A</p> <p>Additional wetland impact would be necessary for the 16th Street Connector (25,000 square feet total).</p> <p>Buffer impacts to Wetlands KK and JJ1 would be approximately 2,000 square feet higher than Alternative 2A (67,000 square feet total buffer impacts.).</p> <p>Removal of forest would be slightly higher than Alternative 2A (42 acres). The amount of remaining vegetation on-site would be 41 acres.</p> <p>The presence of a standard road versus a less-traveled emergency access road would result in increased risk of mortality to species attempting to migrate through this area of the site.</p>	<p>Impacts would be similar to Alternative 2A but with greater buffer impacts.</p> <p>Additional impacts (1,247 square feet) to Wetland JJ2 would be required for the 24<sup>th</sup> Street Connector. Impacts to the buffer of Wetland JJ2 would be 71,000 square feet.</p> <p>Impacts to the buffer of Wetland CC1 would be the least under Alternative 3D.</p> <p>Alternative 3D would result in the least impacts to habitat connectivity because it would maintain an undisturbed connection between Wetlands CC1 and KK.</p> <p>Removal of mixed coniferous and deciduous forest would be slightly higher than Alternative 2F (43 acres on-site and off-site). The amount of remaining vegetation on-site would be 42 acres.</p>	<p>Impacts would be greater than those described for Alternative 2A and less than those described for Alternative 1A.</p> <p>Alternative 4F would result in 26,000 square feet of wetland impact and 108,000 square feet of buffer impact.</p> <p>Impacts to wildlife habitat and habitat connectivity would include the removal of 52 acres of forest on-site and off-site. The amount of remaining vegetation on-site would be 31 acres..</p>
<b>Transportation</b>	<p>No new trips would be generated.</p> <p>Two study area intersections would function at LOS F.</p>	<p><b>Traffic Volume:</b> Project would generate 5,000 weekday daily trips.</p> <p>Chuckanut Dr/16th St would have the greatest traffic volume increase.</p> <p><b>Traffic Operation:</b> Three study area intersections would operate at LOS F. Chuckanut Dr/Hawthorn Rd intersection would be the most impacted of all development alternatives.</p> <p><b>Site Access Operations:</b> Site access would be</p>	<p><b>Traffic Volume:</b> 5,000 weekday daily trips</p> <p><b>Traffic Operation:</b> Chuckanut Dr/Hawthorn Rd intersection would be the least impacted of all development alternatives.</p> <p><b>Site Access Operations:</b> Same as Alternative 1A.</p> <p><b>Traffic Safety:</b> Widening</p>	<p><b>Traffic Volume:</b> 5,000 weekday daily trips. Reduced volumes at four intersections and increased traffic volume at 24th St/Old Fairhaven Parkway.</p> <p><b>Traffic Operation:</b> The Chuckanut Dr/Hawthorn Rd intersection would have less traffic because of the shift of traffic to 24th St which would provide a</p>	<p><b>Traffic Volume:</b> 4,390 weekday daily trips. Impacts similar but slightly lower than those identified for Alternatives 1A and 1B.</p> <p><b>Traffic Operation:</b> Chuckanut Dr/Hawthorn Rd intersection would operate at a better LOS than Alternative 1A. All study intersections would operate at the same</p>	<p><b>Traffic Volume:</b> 4,390 weekday daily trips. Impacts less than Alternative 2A.</p> <p><b>Traffic Operation:</b> Traffic operation LOS would be the same as Alternative 2A. Improved intersection operations at the Chuckanut Dr/Viewcrest Rd intersection.</p> <p><b>Traffic Safety:</b> Safety impacts would be generally</p>	<p><b>Traffic Volume:</b> 4,390 weekday daily trips. Impacts similar to but slightly lower than those identified for Alternative 1C.</p> <p><b>Traffic Operation:</b> All study intersections would operate at the same LOS as Alternative 1C but with slightly better</p>	<p><b>Traffic Volume:</b> 4,520 weekday daily trips. Impacts would be generally consistent with those for Alternatives 2A and 2F.</p> <p><b>Traffic Operation:</b> All study intersections would operate at the same LOS as with Alternatives 2A and 2F but with slightly higher vehicle delays at Chuckanut Dr/Hawthorn</p>

	<i>No Action Alternative</i>	<i>Alternative 1A</i>	<i>Alternative 1B</i>	<i>Alternative 1C</i>	<i>Alternative 2A</i>	<i>Alternative 2F</i>	<i>Alternative 3D</i>	<i>Alternative 4F</i>
<b>Transportation (cont.)</b>		<p>via a fourth leg on the Chuckanut Dr/Viewcrest Rd intersection. No signal would be warranted.</p> <p><b>Traffic Safety:</b> There would be potential for increased occurrences of traffic collisions and increased emergency response times. This could result in making Fairhaven Bridge impassable.</p> <p><b>Non-motorized Travel:</b> The project would enhance non-motorized facilities along the Chuckanut Dr project frontage.</p>	<p>Fairhaven Bridge could improve emergency access and response times.</p> <p><b>Non-motorized Travel:</b> Similar to Alternative 1A with increased access across Fairhaven Bridge.</p>	<p>regional transportation circulation benefit.</p> <p><b>Site Access Operations:</b> The 24th Street/Old Fairhaven Parkway intersection would meet warrants for a traffic signal.</p> <p><b>Traffic Safety:</b> There is potential for higher occurrences of collisions, including 24th Street south of Old Fairhaven Parkway. Also, a new crossing of the Interurban Trail could pose additional risks to trail users unless crosswalk warning applications are used (e.g., signage, crosswalk markings ).</p> <p>Improved traffic safety on 30th St and Chuckanut Dr to the north of the project site resulting in a reduction of traffic collisions.</p> <p>Improved emergency vehicle access and response times as a result of lower traffic volumes on Chuckanut Dr and 12th St. The 24th St Connector would provide an alternative route when the Fairhaven Bridge is impassible.</p> <p><b>Transit:</b> 24th Street Connector would provide a more central location for a transit stop if WTA were to change its bus route.</p> <p><b>Non-motorized Travel:</b> Similar to Alternative 1A, except that there would be greater risks for pedestrians and cyclists using 24th St and the Interurban Trail and reduced risks for those using 30th Street and Chuckanut Drive north of the property.</p>	<p>LOS as with Alternative 4F.</p> <p><b>Traffic Safety:</b> Alternative 2A may result in a slightly fewer traffic collisions than Alternatives 1A and 4F.</p> <p><b>Transit:</b> A bus pullout area on Chuckanut Dr could facilitate transit use by residents of the site were WTA to change its bus route.</p> <p><b>Non-motorized Travel:</b> Similar to Alternative 1A.</p>	<p>better than Alternative 2A at the Chuckanut Dr/Viewcrest Rd and slightly worse at Chuckanut Dr/16th St.</p> <p><b>Transit:</b> Same as Alternative 2A.</p> <p><b>Non-motorized Travel:</b> Non-motorized impacts would be similar to Alternative 2A, except that there is the potential for increased pedestrian/bicycle/vehicle collisions.</p>	<p>operations.</p> <p><b>Site Access Operations:</b> Similar to Alternative 1C.</p> <p><b>Traffic Safety:</b> Similar to Alternative 1C.</p> <p><b>Transit:</b> Similar to Alternative 1C.</p> <p><b>Non-motorized Travel:</b> Similar to Alternative 1C.</p>	<p>Rd.</p> <p><b>Traffic Safety:</b> The increase in the occurrence of traffic collisions would likely fall between the increases associated with Alternatives 1A and 1B, and Alternatives 2A and 2F.</p> <p><b>Transit:</b> Similar to Alternative 2A.</p> <p><b>Non-motorized Travel:</b> Similar to Alternative 2A.</p>

	<i>No Action Alternative</i>	<i>Alternative 1A</i>	<i>Alternative 1B</i>	<i>Alternative 1C</i>	<i>Alternative 2A</i>	<i>Alternative 2F</i>	<i>Alternative 3D</i>	<i>Alternative 4F</i>
<b>Land Use</b>	<p><b>Infill/Density:</b> The 2006 land use analysis prepared by the City of Bellingham assumed Fairhaven Highlands would develop with 1,550 people, 5 percent of the total expected population growth by 2022. Due to the limited land capacity within the City, growth could occur in other cities or, although less likely, in unincorporated areas near Bellingham.</p> <p><b>Environmentally Sensitive Design and Environmental Protection:</b> The property would be consistent with policies that suggest avoiding the destruction of significant natural features, retaining open areas that allow habitat for wildlife, providing connections within forested corridors, and protecting sensitive areas.</p> <p><b>Open Space and Natural Areas:</b> The No Action Alternative would be consistent with policies on protecting unique natural features and preserving wooded hillsides in and around the city.</p>	<p><b>Infill/Density:</b> Consistent with policies encouraging development at urban residential densities in areas where employment opportunities are available. The project would not be effectively served by transit.</p> <p><b>Neighborhood Compatibility:</b> Multi-family structures that could be as tall as 10 stories (approximately 100 feet) would be taller than all other buildings in the neighborhood, and would be visible to some parts of the neighboring community.</p> <p><b>Street Standards:</b> One vehicular access point connecting the project to the rest of the neighborhood would be less effective at building a street network than other alternatives.</p> <p>Does not meet transportation improvement policies.</p> <p><b>Environmentally Sensitive Design and Environmental Protection:</b> Wetland buffers are inadequate to protect the wetlands on the site and development is not set back from unstable steep slope areas.</p> <p><b>Open Space and Natural Areas:</b> Clearing and development would disrupt the forested corridor connecting Chuckanut Mountain and Blanchard Mountain to Padden Lagoon.</p> <p><b>Bellingham Municipal Code:</b> Alternative 1A is generally consistent with the code except in the following areas:</p> <ul style="list-style-type: none"> <li>• Subdivision Design Standards.</li> <li>• Zoning conditions for steep slopes and transportation improvements.</li> </ul>	<p><b>Infill/Density:</b> Same as Alternative 1A.</p> <p><b>Neighborhood Compatibility:</b> Land uses could be displaced from widening Fairhaven Bridge:</p> <p><b>Street Standards:</b> Alternative 1B complies with transportation policies.</p> <p><b>Environmentally Sensitive Design and Environmental Protection:</b> Same as Alternative 1A except that widening Fairhaven Bridge would cause additional impacts to Padden Creek and potential wetlands along the creek.</p> <p><b>Open Space and Natural Areas:</b> Same as Alternative 1A.</p> <p><b>Bellingham Municipal Code:</b> The project would be more consistent than Alternative 1A since the condition for transportation improvements would be implemented.</p>	<p><b>Infill/Density:</b> Same as Alternative 1A.</p> <p><b>Neighborhood Compatibility:</b> The development would be more consistent than Alternative 1A since the 24th Street Connector would allow access through the property by everyone in the neighborhood.</p> <p><b>Street Standards:</b> The development would be consistent with the policy to provide a neighborhood connector to 24th Street with pedestrian and bicycle facilities.</p> <p><b>Environmentally Sensitive Design and Environmental Protection:</b> Alternative 1C would be less consistent than Alternative 1A with policies on utilizing innovative development patterns, preserving open spaces and natural features, and avoiding wetlands and steep slopes because the 24th Street Connector would cross through Wetland JJ2 and its buffer.</p> <p><b>Open Space and Natural Areas:</b> Alternative 1C is the least consistent of all alternatives with policies to incorporate existing mature vegetation and additional trees and native vegetation, because it would entail clearing of the largest area of forest cover.</p> <p><b>Bellingham Municipal Code:</b> Same as Alternative 1B.</p>	<p><b>Infill/Density:</b> Same as Alternative 1A.</p> <p><b>Neighborhood Compatibility:</b> Some of the multi-family structures could be as high as 5-stories which would still be taller than all other buildings in the neighborhood.</p> <p><b>Street Standards:</b> Same as Alternative 1A.</p> <p><b>Environmentally Sensitive Design and Environmental Protection:</b> Alternative 2A would be more consistent than Alternative 1A since it would involve clearing substantially less vegetation, providing larger wetland buffers in most locations, and observing setbacks next to unstable steep slopes.</p> <p><b>Open Space and Natural Areas:</b> Alternative 2A is one of the most consistent with policies to incorporate existing mature vegetation and additional trees and native vegetation.</p> <p><b>Bellingham Municipal Code:</b> Same as Alternative 1A.</p>	<p><b>Infill/Density:</b> Same as Alternative 1A.</p> <p><b>Neighborhood Compatibility:</b> Same as Alternative 2A.</p> <p><b>Street Standards:</b> Same as Alternative 1A.</p> <p><b>Environmentally Sensitive Design and Environmental Protection:</b> Alternative 2F would be less consistent than Alternative 2A since a slightly larger area of wetland buffers would be developed.</p> <p><b>Open Space and Natural Areas:</b> Alternative 2F is less consistent than Alternative 2A since it would require slightly more clearing of mature vegetation.</p> <p><b>Bellingham Municipal Code:</b> Same as Alternative 1A.</p>	<p><b>Infill/Density:</b> Same as Alternative 1A.</p> <p><b>Neighborhood Compatibility:</b> Same as Alternative 2A except that it would be more consistent since 24th Street Connector would allow access through the property by everyone in the neighborhood.</p> <p><b>Street Standards:</b> Same as Alternative 1C.</p> <p><b>Environmentally Sensitive Design and Environmental Protection:</b> The project is less consistent than Alternative 2F since the 24th Street Connector would clear a larger area of regulated wetland buffers.</p> <p><b>Open Space and Natural Areas:</b> This alternative preserves the largest contiguous undisturbed area on site making it the most consistent with policies to incorporate existing mature vegetation in new developments.</p> <p><b>Bellingham Municipal Code:</b> The project would be more consistent to the BMC than Alternative 1A since the condition for transportation improvements would be implemented.</p>	<p><b>Infill/Density:</b> Same as Alternative 1A.</p> <p><b>Neighborhood Compatibility:</b> Same as Alternative 2A.</p> <p><b>Street Standards:</b> Same as Alternative 1A.</p> <p><b>Environmentally Sensitive Design and Environmental Protection:</b> The project is less consistent than Alternative 2F since the development would clear more of the property's vegetation, including a greater area of regulated wetland buffers</p> <p><b>Open Space and Natural Areas:</b> The project is less consistent than Alternative 2F since the development would clear more of the property's vegetation.</p> <p><b>Bellingham Municipal Code:</b> Same as Alternative 1A.</p>

	<i>No Action Alternative</i>	<i>Alternative 1A</i>	<i>Alternative 1B</i>	<i>Alternative 1C</i>	<i>Alternative 2A</i>	<i>Alternative 2F</i>	<i>Alternative 3D</i>	<i>Alternative 4F</i>
<b>Aesthetics</b>	<p>Under the No Action Alternative, the subject property would not be developed. Therefore, there would be no impacts to visual quality and light and glare.</p>	<p>More than half of the existing vegetation would be removed. Changes to the topography would be apparent. Asphalt roadways, concrete driveways, and buildings would cover half of the cleared areas with the remaining cleared area landscaped with ornamental vegetation. The tallest structures would be up to 10 stories tall.</p> <p>The resulting visual quality for motorists, pedestrians and cyclists along Chuckanut Dr would be marked by an abrupt shift from the natural landscape along Chuckanut Mountain and Puget Sound to medium-scale urban development.</p> <p>The visual quality of Fairhaven Park would be reduced. The views from the park would change to a thin buffer of trees, residential structures, roadways, driveways, parked cars, a parking lot, and ornamental landscaping.</p> <p>The changes for residential communities located to the west and south would be considerable. A majority of the vegetation on the hillside would be removed. Residential structures, roadways, parked cars, stormwater ponds, and ornamental landscaping would likely be seen from the homes and roadways. The scale of residential structures in Fairhaven Highlands would contrast with the mobile and single family structures in the existing communities.</p> <p>The change from an unlit forested property to a residential neighborhood would be apparent to motorists on the Chuckanut Scenic Route, users of Fairhaven Park and the secondary trail from the Interurban Trail, and surrounding residential communities.</p> <p>Alternative 1A is generally consistent with the Multifamily Residential Design Handbook except in the following areas:</p> <ul style="list-style-type: none"> <li>Alternative 1A has the second least amount of contiguous open space and the second largest amount of tree removal out of all the development alternatives.</li> <li>Many of the proposed buildings are located in sloped areas and roadways crossing through very steep portions of the site, requiring substantial modification of topography.</li> </ul>	<p>Same as Alternative 1A except that the widening or replacement of Fairhaven Bridge would affect the visual quality of Chuckanut Scenic Route (SR-11).</p> <p>Removing some of the vegetation along the bridge may create a change in the amount of visible light and glare from the bridge street lights.</p>	<p>Visual and aesthetic impacts would be similar to Alternative 1A. The construction of 24th Street Connector would be apparent to users of the Interurban Trail and the secondary trail that travels west through City-owned property towards the subject property.</p> <p>Since the alignment of the Connector would follow the approximate alignment of the secondary trail, it is likely that the dirt trail would be eliminated in favor of a road with bike lanes and a sidewalk on at least one side. The dense forest vegetation would still surround the roadway, as it did for the dirt trail, but the canopy cover would be notably less. Vehicles driving along the roadway would also detract from the visual experience of a natural setting.</p> <p>Light and glare impacts would be similar to Alternative 1A except that the 24<sup>th</sup> Street Connector would also be apparent to users of the Interurban Trail.</p> <p>The project would be less consistent to the Multifamily Residential Design Handbook than Alternative 1A since</p> <p>Alternative 1C has the least amount of contiguous open space and the largest amount of tree removal out of all the development alternatives.</p>	<p>Visual impacts would be similar to Alternative 1A, except that less vegetation would be removed and fewer changes to the topography would occur.</p> <p>Impacts to visual quality for recreational users in Fairhaven Park would be less than those described for Alternative 1A. The western hillside of the property would have fewer single-family structures and roadways than 1A. As a result, a thicker buffer of forest would remain, likely screening the majority of the development from the park users' view.</p> <p>Under Alternative 2A, the level of change to the visual quality for residents in communities to the west and south would be somewhat less than under Alternative 1A. The forested hillside seen from the communities west of the subject property would not be as heavily developed. However, in comparison to 1A the scale of the development would contrast more to existing one- and two-story single-family structures and manufactured homes.</p> <p>Light and glare impacts would be less than Alternative 1A. The majority of light would come from lit windows in the low-rise to mid-rise multi-family structures.</p> <p>The project would be more consistent with guidelines in the Multifamily Residential Design Handbook than Alternatives 1A-1C. Of all development alternatives, Alternative 2A requires the least amount of tree removal. It also and provides more contiguous open space.</p>	<p>Visual quality and light and glare impacts would be slightly more than described for Alternative 2A as result of the 16th Street and Wetland JJ Connectors. This increase in impacts to visual quality would be noticed most by residents living on 16th Street.</p>	<p>Almost one-half of the forest and wetland vegetation on-site would be removed to accommodate the project. The volume of grading on the site would be similar to Alternative 2A, but additional clearing and grading would be required for the 24th Street Connector, similar to Alternative 1C.</p> <p>Visual quality impacts associated with the 24th Street Connector are similar to Alternative 1C.</p> <p>Preservation of the large contiguous forested area between 16th Street Connector and Wetland JJ Connector would screen proposed development, and retain views of forested areas from neighborhoods to the south of the project site.</p> <p>The project would be more consistent with guidelines in the Multifamily Residential Design Handbook than Alternatives 1A-1C. Of all development alternatives, Alternative 3D provides the largest amounts of contiguous open space.</p>	<p>More than half of the forest and wetland vegetation would be removed to accommodate the project. The amount of grading would be similar to Alternative 2F.</p> <p>Viewers from Fairhaven Park and the residential communities to the west would see mid-rise multi-family structures instead of single family units as proposed under Alternative 2F. However, the development footprint would be smaller, reducing the amount of forest vegetation that would be cleared.</p> <p>Under Alternative 4F, light and glare impacts would be more than Alternatives 2A, 2F, and 3D. Lights from the mid-rise multi-family structures would be more apparent to Fairhaven Park users and residents to the west and south. Residents to the south and motorists, pedestrians and cyclists on Chuckanut Scenic Route would experience the largest increase in impacts as a result of developing 51 single family homes in the southeastern portion of the site.</p> <p>The project is similar in consistency to the guidelines in the Multifamily Residential Design Handbook as Alternative 2F except that more filling and grading would be required to develop single family homes in the southeastern portion of the site. This would also reduce the project's consistency with tree preservation and open space guidelines.</p>

	<i>No Action Alternative</i>	<i>Alternative 1A</i>	<i>Alternative 1B</i>	<i>Alternative 1C</i>	<i>Alternative 2A</i>	<i>Alternative 2F</i>	<i>Alternative 3D</i>	<i>Alternative 4F</i>
<b>Noise</b>	<p>There would be no noise impacts under the No Action Alternative.</p>	<p>Construction of the project would occur in phases and be complete by 2022. Associated noise impacts would be temporary. The greatest amount of noise would be produced during earth-moving stages when heavy equipment and trucks would be used. Undeveloped areas and the sloping terrain of the site would buffer receiving properties from construction noise impacts. Under Alternative 1A, approximately 67% of the site would be cleared and the rest of the site would remain undeveloped.</p> <p>The “knob” in the north/central area of the site would be lowered by 25 feet through blasting. Air pressure waves and vibration from the blasting would affect nearby structures and be perceived by occupants. These effects could be controlled according to a blasting plan.</p> <p>Post-development noise impacts would primarily be caused by associated vehicular traffic. Traffic would increase at Chuckanut Dr intersections by up to 131% and at 12th Street and Old Fairhaven Parkway intersections by up to 18%. The increase in vehicular noise could exceed Class A (residential) maximum permissible noise levels.</p>	<p>Construction impacts would be the same as described for Alternative 1A except that widening or replacement of Fairhaven Bridge would broaden the area of noise impacts in the Fairhaven, Edgemoor and South neighborhoods. Receiving properties include Fairhaven Middle School, a sensitive receptor, which would be particularly affected by noise intrusions when in session.</p> <p>Post-development impacts would be similar to those described for Alternative 1A.</p>	<p>Construction impacts would be similar to Alternative 1A, except that construction of the 24th Street Connector would cause additional noise impacts to the east of the project site.</p> <p>After development, traffic volumes on 24th Street would increase from 75 vehicles at the PM peak hour to 443 vehicles, a 490 percent increase. Traffic volumes at other Old Fairhaven Parkway intersections would increase by up to 20% and at Chuckanut Dr intersections by up to 82%. However, there would be lower traffic volumes in some areas of Chuckanut Dr and 12th Street to the north of the project site as a result of the proposed 24th Street connection. These lower traffic volumes would lead to less vehicular noise.</p>	<p>Construction impacts would be similar to Alternative 1A</p> <p>Approximately 50% of the site would be cleared and the rest of the site would remain undeveloped. The reduced area of clearing could mean slightly reduced noise impacts compared to 1A-1C and 4F.</p> <p>More of the units developed under Alternative 2A would be multi-family than under 1A which could result in reduced outdoor noise. Undeveloped areas would act to buffer receiving properties.</p> <p>Alternative 2A would generate fewer vehicle trips than under Alternatives 1A-1C and 4F. Traffic would increase at Chuckanut Dr intersections by up to 105% and at Old Fairhaven Parkway intersections by up to 14%.</p>	<p>Construction impacts would be similar to Alternative 2A.</p> <p>More of the units developed under Alternative 2F would be multi-family and there could be reduced outdoor noise as a result. Alternative 2F includes less developed area than Alternatives 1A-1C.</p> <p>Alternative 2F would generate fewer trips than under Alternatives 1A-1C and 4F. With the project, traffic would increase at Chuckanut Dr intersections by up to 98% and at Old Fairhaven Parkway intersections by up to 14%.</p>	<p>Construction impacts would be similar to Alternative 2A.</p> <p>Approximately 49% of the site would be cleared, which could mean slightly reduced noise impacts compared to Alternatives 1A-1C.</p> <p>More of the units developed under Alternative 3D would be multi-family as compared to 1A, and there could be reduced outdoor noise as a result. Alternative 3D would generate fewer trips than under Alternatives 1A-1C and 4F. Traffic would increase at Chuckanut Dr intersections by up to 40% and at Old Fairhaven Pkwy intersections by up to 17%.</p> <p>There would be less vehicular traffic and associated noise along Chuckanut Dr and 12th St than under other alternatives as vehicles would be able to use the new 24th Street connector as a through street. Traffic volumes during the PM peak hour on 24<sup>th</sup> Street would increase from 75 to 403 vehicles, a 437 percent increase.</p>	<p>The types and magnitude of construction impacts would be similar to those described for Alternative 1A. Approximately 62% of the site would be cleared and the rest of the site would remain undeveloped.</p> <p>More of the units developed under Alternative 2F would be multi-family as compared to 1A, and there could be reduced outdoor noise as a result. Alternative 4F includes more undeveloped area than Alternatives 1A-1C.</p> <p>Alternative 4F would generate a total of 4,520 daily trips; this is more than Alternatives 2A, 2F, 3D and less than Alternatives 1A-1C. With the project, traffic would increase at Chuckanut Dr intersections by up to 103% and Old Fairhaven Parkway intersections by up to 15%.</p>

	<i>No Action Alternative</i>	<i>Alternative 1A</i>	<i>Alternative 1B</i>	<i>Alternative 1C</i>	<i>Alternative 2A</i>	<i>Alternative 2F</i>	<i>Alternative 3D</i>	<i>Alternative 4F</i>
<b>Recreation</b>	<p>No impacts to existing recreational uses associated with construction would occur under the No Action Alternative.</p> <p>Under the no-action alternative, the expected parks and recreation demand increases anticipated under the Comprehensive Plan and the 2008 PRO Plan would not occur, or would occur in the South Bellingham Neighborhood via redevelopment or in-fill of other areas.</p> <p>There would not be an opportunity to formally establish trail linkages.</p>	<p>Construction impacts to existing recreation facilities under Alternative 1A would be limited to noise and fugitive dust impacts at the adjacent Fairhaven Park and along the Interurban Trail.</p> <p>Existing informal trails within the project site, utilized without explicit permission of the property owners, would be removed under all development alternatives. These minor trails provide informal recreation opportunities and provide linkages between Fairhaven Park, the Interurban Trail, areas of the Interurban Greenway, and Chuckanut Dr.</p> <p>Development of the site under Alternative 1A will generate a substantial increase in demand for parks and recreation facilities and programs. Impacts would be generated by approximately 1,550 new residents in Fairhaven Highlands.</p>	<p>Potential impacts resulting from Alternative 1B are expected to be very similar to Alternative 1A.</p>	<p>Potential impacts resulting from Alternative 1C are expected to be very similar to Alternative 1A.</p> <p>In addition, however, temporary short term impacts to the Interurban Trail would occur during construction of the 24th Avenue Connector. Rerouting of trail traffic along a surface street detour route may be necessary.</p> <p>Alternative 1C development would require a new Interurban Trail road crossing for the 24th Avenue Connector.</p> <p>The 24th Avenue Connector would permanently impact two City owned Interurban Greenway properties to the east of the project site.</p>	<p>Potential impacts under Alternative 2A are expected to be very similar to Alternative 1A.</p>	<p>Potential impacts under Alternative 2F are expected to be very similar to Alternative 1A.</p>	<p>Potential impacts under Alternative 3D are expected to be very similar to Alternative 1A.</p> <p>In addition, temporary short term impacts to the Interurban Trail would occur during construction of the 24th Avenue Connector. Rerouting of trail traffic along a surface street detour route may be necessary.</p> <p>Alternative 3D would have the same impacts on the adjacent City-owned properties as Alternative 1C due to the development of the 24th Street Connector.</p>	<p>Potential impacts under Alternative 4F are expected to be very similar to Alternative 1A.</p>
<b>Cultural and Historic Resources</b>	<p>No potential for impacts to cultural resources or archeological sites.</p> <p>No impacts to adjacent historic structures.</p>	<p>Excavation during construction has the potential to cause impacts to unknown cultural resources, including unrecorded archaeological sites.</p> <p>It is not anticipated that significant cultural resources would be affected during ongoing use and occupancy of the Fairhaven Highlands project area. No significant additional ground disturbance is anticipated.</p>	<p>Similar to Alternative 1A.</p> <p>In addition, Alternative 1B has the potential to impact Fairhaven Bridge, which is potentially eligible for listing under the federal and/or state historic registries. The expansion of the Fairhaven Bridge by two lanes would affect the character of the bridge. Further assessment of the bridge structure would be required to determine whether or not it meets criteria for protection as an historic resource.</p>	<p>Potential impacts resulting from Alternative 1C are expected to be very similar to Alternative 1A, except that the area of disturbance would be greater with the construction of the 24th Street Connector.</p>	<p>Like Alternatives 2F, 3D, and 4F, Alternative 2A would require less clearing and grading than Alternative 1A.</p> <p>These alternatives retain more of the forest cover than Alternative 1A, but still involve excavation that could result in discovery of unknown resources.</p>	<p>Like Alternatives 2A, 3D, and 4F, Alternative 2F would require less clearing and grading than Alternative 1A.</p> <p>These alternatives retain more of the forest cover than Alternative 1A, but still involve excavation that could result in discovery of unknown resources.</p>	<p>Like Alternatives 2A, 2F, and 4F, Alternative 3D would require less clearing and grading than Alternative 1A.</p> <p>These alternatives retain more of the forest cover than Alternative 1A, but still involve excavation that could result in discovery of unknown resources.</p>	<p>Like Alternatives 2A, 2F, and 3D, Alternative 4F would require less clearing and grading than Alternative 1A.</p> <p>These alternatives retain more of the forest cover than Alternative 1A, but still involve excavation that could result in discovery of unknown resources.</p>

	<i>No Action Alternative</i>	<i>Alternative 1A</i>	<i>Alternative 1B</i>	<i>Alternative 1C</i>	<i>Alternative 2A</i>	<i>Alternative 2F</i>	<i>Alternative 3D</i>	<i>Alternative 4F</i>
<b>Public Services and Utilities</b>	<p>There would be no impacts to public services and utilities under the No Action Alternative.</p>	<p><b>Firefighting and Emergency Medical Aid</b> Multi-family structures located in the northwest portion of the development under Alternative 1A would be inadequately served. The development would need to meet standards for aerial access and sprinkling.</p> <p>Response times for emergency fire and medical services could be affected. Increased traffic on Chuckanut Dr (by up to 131%) and at Old Fairhaven Parkway intersections (by up to 18%) could increase emergency response times and affect public safety. If Fairhaven Bridge is impassable, alternative emergency access to the site would need to be utilized, likely increasing emergency response time.</p> <p>The increase in demand for emergency services associated with the project would reduce the availability of Engine 2, but the Fire Department would not need additional emergency equipment or new facilities to serve the development. Four additional firefighters would be needed to increase staffing on Engine 2 at Station 2.</p> <p><b>Police</b> There would be a need for 2.5 to 4 more patrol officers and 0.5 to 0.8 of an investigative officer to maintain the City’s current level of police service. This need would add to the current deficit in police staffing.</p> <p>Alternative 1A would not cause a need for new facilities, but there may be a need to establish a new substation to meet demand for police services in southern Bellingham over time</p> <p>Traffic on area streets could increase emergency response times and affect public safety, as described for fire services above.</p> <p><b>Schools</b> The Proponent would be required to enter into a Single-family and Multifamily Mitigation Agreement with the Bellingham School District prior to final project approval to accommodate an estimated 158 new students.</p> <p><b>Utilities</b> The proponent would be responsible for funding necessary improvements and working with utility providers to establish system connections. All providers have adequate capacity to meet expected demand from the project.</p>	<p><b>Firefighting and Emergency Medical Aid</b> The type of impacts under Alternative 1B would be the same as those described for Alternative 1A. Traffic would increase at Chuckanut Dr intersections by up to 25% and at Old Fairhaven Parkway intersections by up to 18%. Expansion of the bridge could reduce traffic congestion and impacts on emergency response times. Limitations associated with the 22<sup>nd</sup> Street emergency access road would remain, as described for Alternative 1A.</p> <p><b>Police</b> Police services impacts on and adjacent to the site would be the same as those described for Alternative 1A. Expansion of the Fairhaven Bridge would reduce traffic congestion and impacts on emergency response times.</p> <p><b>Schools</b> Same as Alternative 1A.</p> <p><b>Utilities</b> Same as Alternative 1A.</p>	<p><b>Firefighting and Emergency Medical Aid</b> The type of impacts under Alternative 1C would be the same as those described for Alternative 1A except that potential impacts on emergency response related to access would be reduced in comparison. There would be lower traffic volumes on Chuckanut Dr because of improved site access. The limitations of the Fairhaven Bridge and emergency access via 22<sup>nd</sup> Street would not be a concern under Alternative 1C.</p> <p><b>Police</b> The estimated population increase and associated increase in demand for police services would be the same as described for Alternative 1A. Impacts on emergency response times would be the same as described for fire services above.</p> <p><b>Schools</b> Same as Alternative 1A.</p> <p><b>Utilities</b> Same as Alternative 1A.</p>	<p><b>Firefighting and Emergency Medical Aid</b> The type of impacts under Alternative 2A would be the same as those described for Alternative 1A except in terms of emergency response times. However, Alternative 2A would generate fewer total vehicle trips than under Alternatives 1A-1C and 4F. Traffic volumes would increase at Chuckanut Dr intersections by up to 105% and at Old Fairhaven Parkway intersections by up to 14%. These increases would be slightly lower than under alternative 1A, and impacts would be proportionately lower. If the Fairhaven Bridge is congested, is blocked by a collision, or otherwise fails, alternate routes into the neighborhood would have to be utilized which would likely increase emergency response times.</p> <p><b>Police</b> The estimated population increase and associated increase in demand for police services would be the same as described for Alternative 1A. Impacts on emergency response times would be the same as described for fire services above.</p> <p><b>Schools</b> Agreement required as described for Alternative 1A but for an estimated 123 new students.</p> <p><b>Utilities</b> Same as Alternative 1A.</p>	<p><b>Firefighting and Emergency Medical Aid</b> The type of impacts under Alternative 2F would be the same as those described for Alternative 2A except in terms of emergency response times. Traffic would increase at Chuckanut Dr intersections by up to 98% and at Old Fairhaven Parkway intersections by up to 14%. Traffic increases along these roads would be slightly lower than under Alternative 1A, and impacts would be proportionately lower. If the Fairhaven Bridge is congested, is blocked by collisions, or otherwise fails, alternate routes into the neighborhood would have to be utilized which would likely increase emergency response times.</p> <p><b>Police</b> The estimated population increase and associated increase in demand for police services would be the same as described for Alternative 1A. Impacts on emergency response times would be the same as described for fire services above.</p> <p><b>Schools</b> Same as under Alternative 2A and 3D.</p> <p><b>Utilities</b> Same as Alternative 1A.</p>	<p><b>Firefighting and Emergency Medical Aid</b> The type of impacts under Alternative 3D would be the same as those described for Alternative 1A except that potential impacts on emergency response related to access would be reduced in comparison. Like Alternatives 2A and 2F, Alternative 3D would generate fewer total vehicle trips than under Alternatives 1A-1C and 4F. Traffic would increase at Chuckanut Drive intersections by up to 40% and at Old Fairhaven Parkway intersections by up to 17%. The 24<sup>th</sup> Street connection would likely improve emergency vehicle access and response times to the site and area.</p> <p><b>Police</b> The estimated population increase and associated increase in demand for police services would be the same as described for Alternative 1A. Impacts on emergency response times would be the same as described for fire services above.</p> <p><b>Schools</b> Same as under Alternative 2A and 2F.</p> <p><b>Utilities</b> Same as Alternative 1A.</p>	<p><b>Firefighting and Emergency Medical Aid</b> Same as those described for Alternative 1A except that multifamily residences located on the cul de sac in the northwest quadrant of the site in Alternative 4F could not be adequately served. An additional access roadway would have to be included in the site plan such that these multifamily structures are accessible from two directions. Alternative 4F would generate more vehicle trips than under Alternatives 2A, 2F, 3D and fewer trips than under Alternatives 1A-1C. Traffic would increase at Chuckanut Drive intersections by up to 103% and Old Fairhaven Parkway intersections by up to 15%. If the Fairhaven Bridge is impassable, alternate routes into the neighborhood would have to be utilized which would likely increase emergency response times.</p> <p><b>Police</b> The estimated population increase and associated increase in demand for police services would be the same as described for Alternative 1A. Impacts on emergency response times would be the same as described for fire services above.</p> <p><b>Schools</b> Agreement required as described for Alternative 1A but for an estimated 130 new students.</p> <p><b>Utilities</b> Same as Alternative 1A.</p>



#### **1.4 Terminology Used throughout the Document**

This document refers to the 12th Street bridge as the Fairhaven Bridge.

The term “Director” refers to the Director of the Planning and Community Development Department for the City of Bellingham who is the SEPA Responsible Official for this EIS.

The term “subject property” or “project site” refers to the 82 acre property proposed for development.

The term “project area” refers to both the 82 acre property and the portions of off-site property that are proposed for development.