

memorandum

date August 19, 2008

to Frances Eustis, Ronald T. Jepson and Associates, P.S.

from Steve Winter

subject Additional information request to support Water Resources portion of the Fairhaven DEIS **DRAFT**

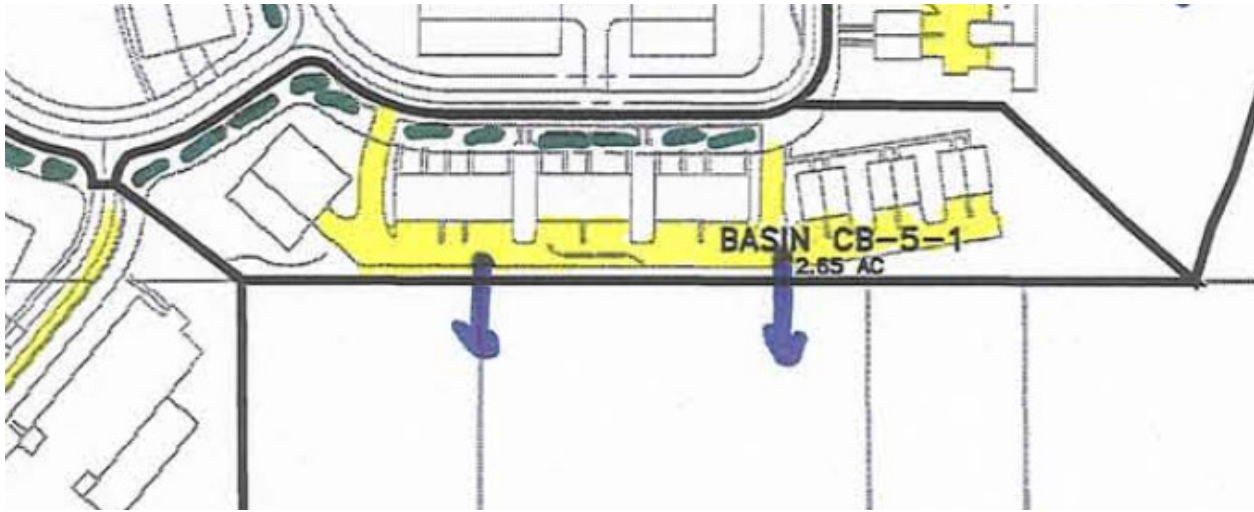
It appears that additional information from the project proponent will be necessary to fully respond to comments from the City of Bellingham based on the review copy of the DEIS for Fairhaven. Many of the comments were provided by Bill Reilly and the general issue is that more detail on some aspects of proposed stormwater management measures is necessary to increase our confidence that the conceptual stormwater management plan is feasible.

The issues where we are requesting additional comment from you are listed here:

1. Topography/Subbasins. Please provide:
 - a. the source of the topography used for the slope analysis and subbasin delineation,
 - b. a more detailed discussion on the methods used for subbasin delineations with focus on the Chuckanut/Padden basin boundary, and
 - c. additional detail regarding how decisions were made to change basin boundaries, including methods included in the stormwater management plan to address the impacts of such changes for each alternative.

2. Use of Dispersion and Infiltration. Dispersion and infiltration trenches are a key element of the conceptual stormwater design. However, there are several areas on the site where these management techniques may not function as intended. These areas include locations with slopes greater than 15%, and some areas where the geotechnical report suggests either having no or limited infiltration. Please comment on the feasibility of relying on infiltration and dispersion where it is proposed, with focus on these areas identified in the geotechnical report:
 - a. Above Wetland FF (Basin PC-1-FF).
 - b. East facing slopes on the southern side of the site.
 - c. The north side of the site (basin PC-2BB).

3. Basin CB-5-1: Please comment on the use of dispersion to adjacent private property, as shown in the portion of figure EX-8 from the Stormwater Site Plan, below.



4. Non Pollutant Generating Surfaces. A key assumption about the site is that landscaped areas within the development will be non-pollutant generating. Please provide additional detail on the CCRs or other mechanism and enforcement that will be implemented to prevent water quality impacts from landscaped areas and other areas categorized as non-pollutant generating.

Also, I believe that two figures from the stormwater site plan will need to be revised for consistency with other parts of the DEIS:

1. Existing drainage basins – this needs the new wetland layer, and please revise the areas to show the entire area, inclusive of the wetlands.
2. Conceptual Drainage Design – this needs the new wetland layer.