

# *North Cascades Audubon Society*

P.O. Box 5805 Bellingham, WA 98227

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Vice-President, Conservation Chair  
North Cascades Audubon Society  
Whatcom County, Washington

Patricia Decker, Director  
Waterfront Futures Group  
1801 Roeder Ave.  
Bellingham, WA 98225

Dear Ms. Decker,

The North Cascades chapter of the National Audubon Society (NCAS) is comprised of 650 members in Whatcom County with interests and concerns related to wildlife, habitat, and natural systems conservation and protection. North Cascades Audubon has represented the values of the National Audubon Society for over 30 years in Whatcom County and during that time marine resource and shorelines have been a consistent priority of the chapter. Thank you for the opportunity to contribute to the scoping element of the Waterfront Futures Project.

## 1

Our first concern relates to the process, approach, orientation, and mechanism by which the Waterfront Futures Group (WFG), in concert with all other involved interests, will engage to create a vision, and subsequently a plan(s), for our city's waterfront. The shoreline environment itself, in its present state, both developed and undeveloped, must be recognized as the first and fundamental element from which visioning and all subsequent planning and development springs forth.

North Cascades Audubon is concerned that as the visioning and planning process proceeds, there will be a tendency to conceptually and practically overlay the various and diverse interests *onto* the environment, as opposed to integrating these interests with the environment. By "environment" in this sense, I refer to the whole of the multitude of collective aspects of the existing shoreline environment in its full range - from natural and unaltered areas, to built upon and highly altered areas. Subsequently, we have a concern that when development possibilities begin to come to fruition, they will tend to have been *overlaid* on the existing environment as opposed to integrated with it. We recommend that in the visioning and plan creation process, The WFG understand and carefully consider this distinction.

North Cascades Audubon encourages the WFG to begin their work with an approach for visioning and creation of a plan that is *founded* on environmental considerations and opportunities rather than viewed as simply another interest to be considered. We also encourage

the WFG to seek expertise outside its members who would facilitate greater understanding of this concept and provide information about practical applications throughout the visioning process and subsequent tasks.

North Cascades Audubon maintains that in an endeavor such as this, establishing the protection, restoration and enhancement of highly functioning natural systems as a fundamental priority will result in an end vision and plan that will meet the most needs and interests effectively - whether environmental, economic or social. By "highly functioning natural systems," we refer to such characteristics as a) excellent water quality (in streams, wetlands, and estuarine and marine environments, b) extensive native vegetative cover, and, 3) shorelines, riparian corridors, nearshore environments, and estuarine environments in their natural condition.

This is not to say that there is not an abundance and diversity of waterfront areas where development is appropriate. Moreover, there is not necessarily even a restrictive or limiting factor within this approach. Land use and economic development of our shorelines must embrace the notion that prioritizing highly functioning natural systems will meet the most needs of the most interests. Historically, this value has often been oriented in opposition or conflict with the visioning and development of what will actually occur on the landscape.

The traditional place for consideration and application of these principles has been within the codes and laws governing land use development, e.g., zoning, building codes and existing environmental regulations. The results of failing to recognize the value of natural elements early in the visioning and planning process for development is in evidence all across the country, as communities pay for the loss of their natural amenities, both in quality of life and in dollars. Without this recognition early on, economic, ecological and public benefit possibilities are constrained and opportunities are lost, or not even considered, and the end product is an imbalance between economic values and environmental and social values. NCAS recommends that the WFG acknowledge these principles and begin their work with an approach that recognizes the value of natural systems and prioritizes that value in all of the work that you do.

## II

North Cascades Audubon recommends that prior to consideration of plans related to the waterfront, the WFG attain a thorough understanding of the current environmental characteristics of the waterfront. We encourage the utilization of existing information and acquiring additional information where necessary to meet this goal. Fundamental elements of a baseline understanding would include identification and classification of the current waterfront characteristics into categories from natural and highly functioning - through the entire range of altered landscapes and shorelines - to entirely built and/or altered. For those areas identified as currently natural and highly functioning, NCAS recommends that these be prioritized for preservation as natural areas, with consideration and delineation of necessary buffers in order to retain their values.

North Cascades Audubon recommends that areas that approach, but fall short of natural and highly functioning, be prioritized for environmental restoration and enhancement. Further, that for all classifications of waterfront referred to above, consider environmental restoration and enhancement opportunities. Additionally, prioritize higher impact development for those areas that are low in natural values and less amenable to restoration. Finally, within the built

environment, consider and establish goals and strategies to re-establish natural elements and amenities.

North Cascades Audubon has identified the natural areas within the scope of this project that are of the highest priority to our organization for protection, restoration and enhancement. They are: 1) Little Squalicum Creek and its terminus at Bellingham Bay, 2) The shoreline running west from the terminus of little Squalicum Creek, 3) Whatcom Creek and its terminus with Bellingham Bay, 4) The beach area and offshore area at the foot of Cornwall Avenue, 5) The shoreline running north from Boulevard Park to the warehouses at the foot of Cornwall Ave., 6) The shoreline running south from the southern end of Boulevard Park to the former Uniflute property, 7) Padden Creek corridor and Padden Lagoon, 8) The Post Point Treatment Facility property, and in particular the saltwater lagoon, and, 9) Chuckanut Bay in its entirety. NCAS recommends that these sites remain as natural in character as they are presently and that restoration and enhancement be prioritized where natural character has been altered and/or degraded.

North Cascades Audubon recommends that the WFG review and incorporate the myriad and multitude of work which has been done by various natural resource agencies and non-governmental agencies related to environmental protection, repair and enhancement of the waterfront, and in particular, work that has been done related to fish and wildlife habitat. We are aware of work done by (this is not an exhaustive list) the Department of Ecology, the Bellingham Bay Pilot Project, the Marine Resources Committee, The Dept. of Fish and Wildlife, and the Habitat Action Team. NCAS encourages the WFG to review this information and recommends entering any and all such documents, sites identified, recommendations made, specific plans and strategies explored, as well as predicted outcomes and benefits into the public record for this process.

NCAS recommends that the WFG prioritize consideration of the following specific individual elements of the natural environment for protection, restoration and enhancement opportunities: 1) juvenile salmon habitat and migration corridors, 2) wetlands (upland and estuarine), 3) avian habitat and habitat corridors, 4) mammal habitat and habitat corridors, 5) forage fish habitat, 6) eelgrass habitat, 7) adult salmon and other salmon habitat and, 8) shellfish habitat. An additional issue for consideration here is the notion of functional connection of these specific environmental elements with existing conditions and existing upland and adjacent areas.

### III

NCAS visions a waterfront in which economic development is in large part determined by the priorities established in sections I and II above. We support a process and plan whereby the character of economic development of the waterfront capitalizes on the natural environment. Wildlife viewing and appreciation of nature is the fastest growing form of recreational activity in America today. From passive participation to highly active, our waterfront offers not only tremendous opportunities itself, but additionally, the city's location and surrounding regional environment make it ideal as a center for such activity.

North Cascades Audubon recommends that the WFG fully explore the idea of having waterfront development oriented toward becoming a regional center for outdoor and nature related experiences. We encourage you to seek information on the economics of wildlife viewing and outdoor oriented activities. Considerations to address include identifying and exploring how Bellingham could be linked to surrounding regional locations which currently provide outdoor

and nature related experiences. Types of activities to consider include: whale watching, recreational fishing, cycling, hiking, walking, climbing, kayaking, canoeing, wildlife viewing, sailing, cruising, etc..

A specific example of an existing program which ties in with this endeavor is the Great Washington Birding Trail, a joint effort of the Washington State Department of Transportation, the National Audubon Society, and other state natural resource agencies. There are numerous other existing programs which NCAS wishes the WFG to identify and explore the opportunities provided by them in the context of these recommendations.

North Cascades Audubon encourages the WFG to identify and explore opportunities associated with education and educational facilities related to outdoor activities and the natural world. This would include exploring the idea of museums, nature centers, birding trails, and wildlife rehabilitation centers, for example. In particular, NCAS would like the WFG to consider the development of a regional educational facility that would provide opportunities for residents, visitors, and research, as a central component of waterfront development.

North Cascades Audubon requests that during visioning and creation of a plan, that the WFG prioritize benefits to the public over benefits to the private sector. NCAS recommends a plan that would create as much public space as possible, maximum waterfront access, and a prioritization in the built environment for public facilities, e.g., museums, learning centers, and other educational facilities.

With regard to the areas planned for development and/or to be built upon, NCAS recommends establishing an approach-wide goal for the creation of as little impervious surfaces as possible. We encourage the WFG to explore the opportunities of combining treatment of stormwater with meeting natural areas and habitat values. We also ask that the WFG explore the idea of creating a stormwater management system(s) which would serve as a model of multi-value strategies for development.

With regard to development techniques in the built environment, NCAS recommends an exhaustive exploration and application of those techniques and applications which are wildlife and natural system friendly. This prioritization is particularly relevant to architectural designs. There is a multitude of often unexplored and thereby unconsidered techniques and opportunities to meet this goal that are neither more expensive or limiting in any way to the functions of the built environment.

The North Cascades Audubon Society looks forward to submitting more comments during this process. Because of the particular focus of the scoping element of this process, NCAS looks forward to offering more specific suggestions, strategies and other input later in this process. Thank you for your consideration.

Respectfully,

David M. Schmalz  
Vice President, Conservation Chair  
North Cascades Audubon Society