

September 16, 2004

Patricia Decker
Director, Waterfront Futures Group
114 East Magnolia, Suite 501
Bellingham, WA 98225

RE: Comments on WFG Framework and Action Plans

Ms. Decker:

City Staff assigned to update the Shoreline Master Program (SMP) for the City of Bellingham has reviewed the WFG Framework Plan including the 'Update' and the Action Plan. City Staff has reviewed the WFG Plans in accordance with the Comprehensive Goals and Objectives of the Draft SMP and makes the following observations:

OVERALL

The Framework Plan (FP) is easy to read and understand. The Recommendations are clear and specific although in a few instances are not consistent with overall narratives of a particular sub-area or the Guiding Principles.

The Recommendations and Guiding Principles within a few of the sub-areas overlap. Perhaps the Guiding Principles could just be listed at the front – as has been done – with the specific Recommendations listed for each sub-area. Overall, the specific Recommendations for each sub-area are clear and helpful for eventual implementation – or not – into the updated draft SMP.

The graphics in the FP are also easy to understand.

There should be more language stressing a “net gain” in shoreline habitat function. The Action Plan divides habitats into sections, which is helpful identifying appropriate restoration and economic development opportunities. As a result though, the understanding of an interconnected, functioning shoreline habitat is lost.

Our SMP states that mixed uses are encouraged along the marine waterfront, especially where navigability is not viable.” The FP encourages mixed uses in areas where navigability **is** viable. It is the goal of the SMP to encourage the existence of water-dependent uses where navigability is viable.

Your plan should further stress the requirement of using Low Impact Development techniques.

FRAMEWORK PLAN & UPDATE

LITTLE SQUALICUM

Emphasis seems to be on habitat enhancement – specifically at the outfall of Little Squalicum Creek. Improve (create) the estuary in this location. Consider the notion of a public pier further north or south of a potential estuary in that location. Habitat should take precedence in this area as it is the dominant feature.

Access should be predominantly from the shore/beach or from the bluff above at selected viewpoints/street ends. Access points to the beach below should be located at one end or the other and not traverse along steep banks or interface with RR.

Guiding Principles (Promote Dynamic Economy) don't seem to align with existing uses and zoning in terms of uses and proposed water-dependent activities. Specifically #2.

Recommendations for Little Squalicum and specifically the Cement Plant are very specific and are clear for implementation.

SQUALICUM

On the sub-area map, identify the difference between 'long-term mixed' use and just 'mixed use.'

Mixed use on the west side of the I & J is not consistent with the verbiage in the CITY CENTER sub-area (water-dependent uses on both sides of the I & J)

Recommendations: Future development: 'replace existing boat launch with dry stack storage.' Where would new boat launch be located to provide that service in town where water-related uses are in close proximity?

Is it possible to expand the City Center Design Guidelines to waterfront areas?

Restoration and natural habitat: why is sub-tidal habitat bench specifically called out for at the I & J Waterway where there is no estuarine function.

Good language on removal of surface parking and elimination of old in-water structures.

CITY CENTER

If the WIST is reserved and depth is reserved in the Whatcom Waterway for water-dependent commerce (on the south side especially), the upland supporting areas (storage, transportation access, etc) are not adjacent, or anywhere near.

Guiding Principles: water-dependent uses should be priority

Recommendations: Future uses: 2nd bullet, no water-dependent uses on the west side of the ASB due to significant eel grass beds. This is contrary to Comprehensive Strategy of the BBDPP.

Future development: creating a PRA and then a plan for the city center seems to be duplicative of the WFG effort and the existing COB City Center Master Plan.

Middle of Roeder Avenue landfill peninsula is designated for public activities / parking which would be surrounded by water-dependent industrial. That space may be better reserved for water-related uses given proximity to navigable waterways.

C Street seems to be designated to bisect Maritime Heritage Park / fishery facility from the water up to Dupont Street. D street provides same function presently.

Proposed uses at Cornwall Avenue landfill are compatible with direction of SMP.

SOUTH HILL / BOULEVARD

Emphasis on habitat enhancement and public access provisions – especially out over-water on the west side of RR is excellent.

FAIRHAVEN

Connections and Access: there is an existing trail along 8th Street / Padden Creek.

Area designated for new park – immediately south of Douglas Avenue – is a worthwhile notion but may be best considered as additional land area for mixed uses – live work studios.

ACTION PLAN

Understanding that the Waterfront Renewal Authority (WRA) has been tasked with some possible responsibilities and oversight emphasis should be on bullets 3 - 6 on page 2. Bullet numbers 1 and 2 tend to heap more 'layers' on an already burdened process and staff.

Creation of a City Center Waterfront Renewal Plan: isn't that what the FRAMEWORK PLAN is? Seems duplicative. It seems as though the CCWRP will try to do what the market demands might dictate instead.

Page 4: Reinforce qualities of each place on the waterfront: Consider extending the existing City Center Design Guidelines to waterfront areas. Recreating new design guidelines may be a large work-item.

Page 5: Restore health of land and water: The SMP update will include an inventory of existing conditions on the marine shoreline (habitat areas including nearshore/foreshore/aquatic environs) These inventories will assist the City in assigning development regulations for the marine sub-areas as identified in the WFG Framework Plan.

The WRA should be gathering and consolidating existing and newly developing information about the contamination in the waterfront area. The City and the Port has conducted its fair share via the Pilot Project.

Page 6: Identifying public access sites via development or purchase is helpful.

WRA should be charged with the responsibility of the interaction with the BNSF RR.
(carrying forward the vision and opening the discussions)

I would like to complement you and the Futures Group and the consultants on a well-crafted product. As City Staff assigned to update the City's SMP we intend on drafting a plan that intends to carry many of these visions forward – understanding of course that a public process awaits us in early 2005.

Thank you for your patience and the opportunity to make these comments. If you have any questions please contact me at 676-6982. The SMP project team looks forward to meeting with you very soon.

Sincerely,

Steven Sundin
City of Bellingham
Planning Department