

From the Desk of Janet Burcham

September 10, 2004

To: The Waterfront Futures Group and City Council of Bellingham,

I appreciate the long hours and dedication the volunteer Waterfront Futures Group has put into the process of the waterfront development. I especially thank John Blethen for his persistence in keeping the natural environment a key element of the discussions and designs and for bringing in the qualified technical experts to speak on those topics. I have some area specific comments and a couple of procedural comments. I'll start with the procedural comments.

If a select group is picked to carry the volunteer WFG plans from this point forward and is responsible for carrying out its goals and holding public meetings, then it must include citizen(s) and agency staff that represent environmental advocacy and environmental technical/regulatory expertise. I am leery of a group selected of only business interests and no environmental expertise to commit to carrying out the habitat restoration/ protection objectives that are only vaguely defined in the WFG Plan. I am also concerned that the outcomes of future public hearings on the same natural areas that were discussed at length in the WFG process might result in complete turnarounds from the current position of protection/restoration. What assurances do we the public receive that our comments made over and over at public hearings to date won't be set aside and all options become open and 'on the table again' for development?

I question what the objective is to 'inventory natural areas for prioritizing restoration/protection' as stated in the Plan. The Bellingham Bay Pilot Project, the Habitat Action Team, and the technical environmental working group composed of state, city, county, and consulting experts convened by the WFG have all specifically identified the important sites. These efforts have also specifically detailed what natural resources these sites have and specifically what should be done to protect and restore them. Why does the WFG see a need to inventory the area again? The schedule for such an inventory appears to lag behind a schedule for commitments to block out areas for development. If the specific information provided by the three technical working groups mentioned above is not used to constrain development early on, then those natural resources will be irretrievably compromised if not lost. I strongly recommend revising the strategy here to utilize the expert information that exists and not defer to some vaguely designed 'inventory' to identify priority natural sites for protection/restoration.

I will now provide area-specific comments.

#### Cornwall Pocket Beach, end of Cornwall St.

The removal of buildings south of Pine St. in the latest drawing of the Cornwall beach area and any future designs is commendable and critical. This pocket beach is the last, largest natural sandy beach along the waterfront and should be protected for the forage fish habitat it provides and the most natural contact people can have along this filled and hardened waterfront.

#### Little Squalicum Area

- The Mt. Baker Plywood operation is not a water-dependent activity. It should be considered in a long-term redevelopment plan that this site be restored to its natural beach

condition by removing the structures and fill to restore the extent of the Squalicum Creek estuary and the intertidal area between it and Little Squalicum Creek.

- Clarify that the “woody debris” or “carbon material” from Little Squalicum beach means the bark and wood chip debris accumulated from years of log raft and milling activity—not the driftwood which is present on the beach and is a desirable habitat feature.

#### Squalicum Cr. Area

- Do not site jitney stop or kayak launch in newly restored habitat. This can conflict with the goal of habitat restoration or protection and enhancement. This is a general comment for all the proposed jitney/kayak launches. There are too many in a confined distance, and several of them are proposed for areas that are a priority for natural resources protection/restoration if not already existing eelgrass beds. The new launches/docks concept needs to be carefully investigated for: 1) no impacts to existing/created/enhanced/restored natural areas, and 2) need (commercial viability, accessibility from other nearby sites)

#### Cornwall beach Area

- Constructing a dock or float for kayak launch or jitney stop conflicts with the intention of restoring beach habitat and nearshore intertidal habitat for forage fish spawning and juvenile salmon foraging.

#### I and J St. Waterway

- The pocket beach at the end of this narrow channel was identified by the Environmental Work Group as a natural sand beach with potential for direct access by foot to the water and for a hand-carried boat launch. This needs to be specified in the WFG Plan as well.

#### City Center Area

- The item “Develop a linear park along the waterfront with a trail component” deleted in the updated version of the June 24 Plan. Why was this concept dropped? This feature is exactly what we who have been participating in the planning discussions have desired and repeatedly voiced. Why can’t Bellingham have a linear walkable greenway along the waterfront? This is our vision.
- The Environmental Work Group identified areas adjacent to the marina breakwater walls as locations for placement of shallow intertidal habitat benches. These features should be specified in the Plan.
- The Environmental Work Group identified replacement of the large rip-rap facing south of Pine St. and along the Cornwall landfill with smaller material to provide a softened edge and improve intertidal habitat. This element should be specified in the Plan.

#### Boulevard Park Area

- Any additional overwater structures, whether they are docks, floats, or boardwalk/trail extensions, should not be sited over eelgrass beds or other sensitive intertidal habitat that presently exists.
- Creation of a beach at Boulevard Park similar to the one planned for Marine Park was identified as an option by the Environmental Work Group. This is a valuable addition to a popular park.

#### Padden Creek estuary/lagoon

- The Environmental Work Group described restoration of the mouth of Padden Creek to a more natural configuration. This included removal of fill and building structure on the north side of the channel at the mouth that is currently used for industrial purposes. Enhanced tidal flow through modification of the railroad crossing of the lagoon would aid restoration as well. **The recommendations of the Environmental Work Group for this area should be included in full in the Plan.**

#### Post Point Lagoon and Heronry

- The Environmental Work Group identified specific measures to improve, restore, and protect the resources of this area. These included increasing the buffer between dog/human activity and the heron rookery and removing off-leash dog access to the lagoon and planting a native vegetation buffer around the lagoon. **The recommendations of the Environmental Work Group for this area should be included in full in the Plan.**

#### All areas

- Apply the same surface and groundwater contamination collection and treatment plan concept proposed for Squalicum Cr. to all other areas
- Define “Tailor environmental cleanup strategies and remediation to planned use.” If this does not mean comprehensive cleanup necessary to “restore the health of land and water”, then amend this statement to be consistent with that goal.
- Specify that managing stormwater to enhance estuarine habitats means treatment of stormwater to remove toxic and deleterious contaminants and regulating discharge to prevent pollution of marine habitats and erosion.