



September 10, 2004

Patricia Decker
 Waterfront Futures Director
 Harbor Center Building
 1801 Roeder Avenue
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 pdecker@cob.org

RE: Waterfront Futures Visions, Framework Plan and Action Plan

Dear Ms. Decker and the Waterfront Futures Group,

Thank you for the opportunity to comment on the Waterfront Futures Visions, Framework Plan and Action Plan. These documents represent a thoughtful and forward-looking process.

People for Puget Sound is a citizens' organization whose mission is to protect and restore Puget Sound and the Northwest Straits. We focus on water quality and habitat, advocating that the State of Washington devote more resources to the prevention of further degradation of the Sound.

The redevelopment of Bellingham's waterfront is a once-in-a-100 year opportunity to redefine the water's edge both for humans and for wildlife – for the economy and the environment. People For Puget Sound feels that it is critical that habitat restoration and water and sediment cleanup be incorporated into the plan at an equal level as economic and transportation elements. Specifically:

- We support the creation of a “Waterfront Renewal Authority.” This entity will be able to ensure accountability for implementation of the Action Plan as the redevelopment occurs and into the future.
- We are concerned that the Action Plan and technical reports not become a catalog of problems, policies and opportunities but instead will list specific environmental actions with implementation schedules and sources of funding.
- A vertical seawall, adjacent to marine areas, will not support juvenile salmon and other marine species that need shallow water areas for refuge from predators. Juvenile salmon need shallow nearshore habitat in order to survive and thrive in the critical shoreline area. We recommend that the Waterfront Futures Group investigate innovative seawalls in order to provide habitat (terracing, hanging structures on the wall, etc.).

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- Much of the redevelopment tied to the visioning requires cleanup and remediation. This cleanup can be done under short-term low cost approach or with longer-term ecological values in mind. The current Port due diligence to acquire the Georgia-Pacific property in exchange for cleaning it up is a good example. We strongly advocate that the redevelopment and property acquisitions and transfers be tied to environmental needs.

Land use decisions such as those made under the Waterfront Future directly impact Puget Sound. Reductions in vegetation, increased urban runoff from streets and parking lots, and improper development near the shoreline negatively impact the fragile Puget Sound nearshore ecosystem.

The sandy beaches, rocky shores, eelgrass beds and kelp forests, salt marshes, and intertidal mudflats that make up Whatcom County's marine shorelines provide critical habitat for important species, including sea and shorebirds, herring, salmon, and shellfish. These species form the basis of the food web that supports the abundance of life found in the Sound, including harbor seals and orca whales.

Unfortunately, critical marine habitats are quickly disappearing. For example, more than one-third of Puget Sound shoreline habitat has been destroyed due to bulkheads, piers, docks, and other structures. Throughout Puget Sound, 75% of salt marsh habitat is gone and polluted runoff sends millions of gallons of toxic chemicals, like mercury and petroleum compounds, into the Sound. Puget Sound's salmon and orca whale populations are listed as endangered by the state, and in the case of salmon, also by the federal government.

The Waterfront Futures Project can serve as a model for Washington State in how to do it right.

If you have any questions, please feel free to call me at (206) 382-7007 or Mike Sato at (360) 336-1931. Again, thank you for the opportunity to comment, and we look forward to working with you on this important project.

Sincerely,

Heather Trim
Urban Bays Project Coordinator

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