



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Region 4 Office: 16018 Mill Creek Boulevard - Mill Creek, Washington 98012 - (425) 775-1311

September 7, 2004

Patricia Decker
Waterfront Futures Project Director
114 West Magnolia Street, Suite 501
Bellingham, Washington 98225

SUBJECT: Washington Department of Fish and Wildlife Comments - Draft Waterfront Framework Plan

Dear Mrs. Decker,

The Washington Department of Fish and Wildlife (WDFW) has reviewed the Draft Waterfront Framework Plan (Plan) dated June 8, 2004 and provides the following comments for your consideration.

General:

WDFW would first like to acknowledge the hard work that was required to create the Plan. In general, WDFW has found the Plan to be both interesting and thought provoking. However, it is important to note that despite a herculean effort to solicit input from the community, the Plan is still the vision of a committee representing the interests of Bellingham's business community and not the diverse interests and priorities of the community at large. Though it is unclear how the Port and City intend to use the Plan, our comments are based on the assumption that the Plan is intended to be used as a source of ideas and inspiration and not as a blue print for implementation. As such, WDFW has relatively few concerns and comments. However, if our assumption is incorrect and the Port and City intend to use the Plan as something more than a guidance document, WDFW requests the opportunity to provide more detailed comments than those presented here.

Linkages:

The relationship of the Plan to existing planning efforts and regulatory processes is unclear. The Plan would be enhanced if the linkages and relationships to other planning processes and regulatory authorities were identified and discussed more fully.

Upland and In-water Contamination:

The Plan does not adequately identify or address the contaminated upland and in-water areas within the planning area. Though the Plan's guiding principles address the existing contaminated upland areas, they do not acknowledge the existing contaminated in-water areas. The Plan needs to include a guiding principle that recommends the remediation of contaminated in-water areas. The Plan also needs to map the contaminated upland and in-water areas that have

been identified through the Bellingham Bay Pilot. The Plan also needs to clearly state that remediation of the contaminated upland and in-water areas will be required before habitat restoration and/or commercial/residential development can occur in those areas.

The Plan needs to acknowledge that the remediation of contaminated upland and in-water areas along Bellingham's waterfront is determined through a public process under a regulatory context. The Plan also needs to create a linkage to the Bellingham Bay Pilot and defer to the Bellingham Bay Pilot for the cleanup strategies and regulatory processes necessary to clean up the contaminated upland and in-water areas

Habitat Protection and Restoration:

Habitat protection, restoration and creation within the Waterfront Futures planning area is critical to and necessary for the future health and survival of the marine natural resources in Bellingham Bay. From WDFW's perspective, a healthy and viable marine ecosystem, natural resources and shoreline has as much, if not more, future value to the community than commercial and residential shoreline re-development. Consequently, the future of Bellingham's waterfront would be better served if the Plan offered a stronger advocacy for marine habitat protection, restoration and creation. From WDFW's perspective, the guiding principle that states "Create and restore habitat wherever possible" falls short of the mark. It has been our experience that "wherever possible" almost always means that the interests of commercial/residential development will prevail over the interests of habitat protection, restoration and creation when the two interests conflict for the same shoreline area. It is WDFW's contention that habitat protection, restoration and creation needs be given the same consideration and value as commercial/residential redevelopment within the planning area.

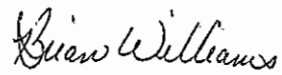
The Plans guiding principles need to advocate for the protection of existing critical habitats within the planning area such as existing eelgrass habitats, estuary habitat, smelt spawning habitats and sand lance spawning habitats.

The Plan needs to acknowledge that the habitat restoration ideas highlighted in the Plan do not represent all of the potential habitat protection and restoration ideas that have been identified through the Bellingham Bay Pilot or the Waterfront Futures Habitat Workshop. The Plan also needs to acknowledge that a rigorous prioritization process was not used to select the habitat restoration ideas that have been highlighted.

The Plan needs to create a linkage to the Bellingham Bay Pilot Habitat Plan and the Waterfront Futures Habitat Workshop Report.

If you have any questions, please contact me at (360) 466-4345, extension 250.

Sincerely,

A handwritten signature in cursive script that reads "Brian Williams".

Brian Williams
Area Habitat Biologist