

**Aven, Heather M.**

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Friday, May 8, 2020 6:08 AM  
**To:** G.Proj.City View  
**Subject:** CityView

To Whom it May Concern:

CityView, the proposed development, would be built directly behind our house.

We are very concerned about this and sincerely hope the proposed development does not happen. We understand that it is important for Bellingham to have affordable housing, but we believe that it should be done in a respectful and honest way that does not harm the community.

My husband and I saved for several years to purchase a house to raise a family in. We looked for a neighborhood that was child and family friendly, and our neighborhood has not failed to deliver. We live across the street from a family with three young children, whom we share weekly dinners with. Next to them is another family with two young children, and they have also become our trusted friends. On their other side lives a retired woman, who has lived in her house since the time it was built--she dedicates her time to volunteer work, and when I was struggling as a new mother, took weekly walks with me and offered much appreciated support. Our next door neighbors are a lovely retired couple, and on our other side lives a young couple who just purchased their house and are dismayed at the possibility of CityView being built. This is a small, but accurate snapshot of our neighborhood. It is not an exaggeration to say that this is a community of people who have worked so hard to live in a neighborhood where they feel safe and where we share a sense of camaraderie. It is the reason we are united in speaking up and defending our community.

I believe CityView will harm our neighborhoods. I don't believe CityView is being honest by portraying itself as affordable multi-family housing--I believe CityView will be used as a college dormitory for students of means, as each unit will consist of 3 bedrooms, each with an attached bathroom. I don't believe CityView is being honest in its effort to protect the property of surrounding homeowners--a new geohazard study was requested by the city, and this requirement was not met. Instead, an old study was submitted, one conducted in 2013 that does not address neighborhood concerns. Lastly, I don't believe CityView is being honest in fairly taking into account the context of the area it will be built in--CityView will not result in an improvement to the surrounding neighborhoods. The increased noise, which will not be sufficiently mitigated, increased traffic, which our streets are not equipped for, and additional run-off, which will harm our properties, are all real and important concerns that pose a danger and hazard to our residents, our children, and our homes.

Bellingham is a wonderful city that I am proud to belong to. This neighborhood is not just a collection of houses, it is my home and the home of my friends and family. We have worked hard to live here and value the safety of our families above all else. We sincerely hope the city will hear our concerns and reconsider the proposed development.

Thank you for your time,  
[REDACTED]

## **CITY VIEW COMPLEX**

May 7, 2020

From John Parish, home owner, Nevada Street

Dear Ms. Bell:

I am sure we all know the multitude of reasons why this complex should not proceed. I will bypass all of the rational reasons sent in by other home owners and go to one extremely important issue.

### **COMMON SENSE**

This property is like an island surrounding and impacting one and two story homes. These are the residents that rely upon you and the city council to safeguard their properties.

### **ENTRANCE**

The developer wants to drop a huge property complex in the middle of this island. A one way in – one way out onto Consolidation Avenue which is unequipped to handle the construction traffic, let alone the current residential traffic.

### **WHY**

The developer of this complex will generate \$250,000 to \$275,000 cash revenue each month. This developer is totally disregarding the disruption of lives and devaluation of homes and property of all neighborhood residents, which it will assuredly do.

### **THE BIG FACTOR**

Please get in your cars and drive to the end of Consolidation Avenue, where the entrance to the complex is proposed. Picture attached. I point this out because it is the **ONLY** entrance for this project.

**One way in – one way out.** NO other entrance is available in the 360 degree circle. This developer will need to remove a huge part of the mountain between Puget Street on the top, and Nevada Street on the bottom of Consolidation Avenue. The developer has most certainly played this aspect down.

Cutting the base out of this mountain will cause severe problems in the future. Let's all remember last February and the hills sliding, shifting and roads cracking.

Retired seniors, families with children, everyone that so worked hard for their homes and do not want it all to go up in construction dust.

What are all of the home owners on Puget and Nevada streets expected to do when this starts?

The construction activity alone will drive many home owners out. This is of course, assuming that anyone will want to buy their home once they are aware of the the possibility of this mass construction.

Finally, I hope the City of Bellingham and the developer are ready for the multitude of law suits that will certainly follow by approving this complex caused by the property changes.

John Parish  
360-733-3674  
852 Nevada Street  
Bellingham, WA 98229

## WHAT DO THE HOME OWNERS DO?

**X** marks the one entrance to this monster project

One side road is the total entrance for this complex

Out of this one entrance for at least eighteen months neighbors will have Tree cutters  
Tree Hauler trucks - Flat Beds transporting Caterpillars. Earth movers, earth dump trucks  
Supply trailers, dry wall deliveries, pipe deliveries, Cement Trucks

\* Not including no parking so delivery flat beds & trucks park on side streets.

We have not even covered the construction workers & their parking.

**What will the home owners do all this time. Leave town!**

This project on this property makes no sense - Like strip mining a property

Not much left when finished.

From 7:00 AM to 6:00 PM **SEVEN DAYS A WEEK** all Neighborhood residents will  
not get sleep in or have peace and enjoy their homes and back yards.

**This is 100% family residences - why drop this 5 1/2 story building  
Right in the middle of one & two story houses.**



**Aven, Heather M.**

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**From:** Alan Hui <alanhui@yahoo.com>  
**Sent:** Friday, May 8, 2020 8:40 AM  
**To:** G.Proj.City View  
**Subject:** On CityView applicant's response  
**Attachments:** DJI\_0003-21.jpg

On the attached photo, it shows the tall mature trees covering the platt proposed for the CityView dormitory complex development.

Two key points to observe from this photo:

1. The homes on Puget (way up on the top left) is on Puget Street at an elevation of about 450 feet while the homes on Nevada is at around 150 to 180 feet. This strip of forest covers a terrain that spans at least 270 feet. Some areas has been reported to be over 45% grade. 51% clearing of the mature vegetation requested by the developer on this strip of land introduces a risk to the soil stability, resulting in instability to Puget Street above and uncontrolled groundwater or even mudslide, damaging yards and homes on Nevada.
2. The proposed development designed an emergency fire lane, exiting from the site onto Nevada. Note the narrow strip of blackberry patch next to the first white house on the lower left foreground. Also note the narrow residential street--Nevada. Can a full size fire engine make this turn? What if there are couple of cars parking on the east side of Nevada?

The scale of this proposal is unfit for this neighborhood. These are just two examples of the numerous environmental, safety issues that results from a development proposal that is too big, unfit for this area of our neighborhood.

Alan Hui & Angela Chen  
851 Nevada Street



**PACIFIC WOODS CONDOMINIUM**  
Windermere Property Management  
541 W. Bakerview Road, Bellingham, WA 98226

May 7, 2020

Kathy Bell, Senior Planner  
City of Bellingham, Planning and Community Development Department  
210 Lottie Street, Bellingham, WA 98225  
kbell@cob.org

Rick Sepler, Director  
City of Bellingham, Planning and Community Development Department, Planning Division  
210 Lottie Street, Bellingham, WA 98225  
planning@cob.org

Dear Ms Bell and Mr. Sepler,

As residents of the Puget Neighborhood, we write to register serious concerns regarding the City of Bellingham approving the massive CityView dormitory-style complex which is undergoing review by the City of Bellingham Planning Department at this time.

You will see from our comments that we believe the project is ill-conceived, ill-placed and ill-timed; and that it will result in negative impacts to our quality of life and the character of our Puget Neighborhood. We therefore urge denial of the CityView, and request a written response to our underlined questions.

### **TRAFFIC AND SAFETY ISSUES**

**Vehicle Traffic:** CityView is designed to be a 318 dormitory style unit complex. In large measure, each resident will routinely drive up and down Nevada or Consolidation. In addition, there will be significant additional traffic from deliveries, utility services, emergency vehicles and guests. There are only two roads in and out, and they will be severely impacted. Consolidation and Nevada Streets are not built to be major thoroughfares. They are not wide enough. They lack traffic lights, and they have little and sometimes no shoulder. The upshot to the City of Bellingham is increased risk due to accidents and potential law suits.

**Bicycle and Foot Traffic:** We understand the number of parking spaces proposed for CityView falls short of the number of rental rooms by about 70 presuming residents will use bicycles or walk. This does not seem like a good bet. The location is at the top of a steep hill. Bellingham has

a long dark, wet, cold season, and higher elevation roads become treacherous as temperatures drop. As such, it is hard to understand how cyclers and walkers will be able to safely navigate the roads in question during those times. So while it is true that some stalwart residents may continue walking and bicycling in bad weather, it is folly to allow the reduction in the number of parking spots under the presumption that bipeds will take up the slack.

## **HILLSIDE RUN-OFF IMPACTS**

Pacific Woods Condominium Owners' Association has a private storm water drainage system which we maintain. Toxic run-off from the impervious parking areas at CityView and increased run-off from the unintended consequences of building in the wetlands has potential to add significant debris and mud into our private system. We are also quite concerned about soil instability which will likely result from cutting into the hillside during grading, and the addition of fill material. Will the City of Bellingham take over the maintenance of our storm water system? Only then will we be at ease on this issue.

## **DEGRADATION OF WETLANDS**

The proposed building site is largely on precious Bellingham wetlands. As a city, we say we care about preserving our wetlands, preserving natural habitat, and making sure our wild creatures continue having a home in the name of bio-diversity. It therefore makes little sense that the City of Bellingham will cavalierly allow wetlands to be significantly impacted with, again, unknown consequences. We also understand that a number of natural springs may be disrupted causing redirection or stoppage of the springs resulting in water-starvation to vegetation downslope which may well add to the risk of forest fires in the area.

## **OUT OF PROPORTION**

While the CityView project is not visible from Pacific Woods Condominium, it is clear from the diagrams that the project is hugely out of proportion to the adjacent neighborhood. The near-by single-family homes should NOT have a huge multi-family project right next to them. It will degrade their property values and the trickle down impacts to our property values is unknown. The project is more suited to an Urban Village where there is an expectation of higher density. CityView definitely does not belong "nestled" among 160 single-family homes in what is presently a quiet, peaceful neighborhood. We were under the impression that the City of Bellingham does not allow massive jumps in housing types, that it prides itself in gradually going from single-family, to duplex, to multi-family. How can this project then be allowed given the goal of essentially protecting the character of our neighborhoods?

## **POOR TIMING**

Due to Covid-19, our entire society is in a huge retrenchment, and it is unclear how long it will take to recover. Many economists think it will be years before any return to pre-Covid “normal”. We do not know, for instance, if our local university may be able to hold in-person classes next year or even the year after. We also do not know if the developer will have the funds to complete this massive project should filling the units become a challenge at market rate or any other rate. The potential for the project to be partially built and abandoned seems entirely probable given the impacts from the pandemic. This is just one final reason why this project should be shelved. Perhaps the City of Bellingham has a full-proof mechanism to make sure there will be no major cost to our taxpayers, perhaps a huge bond which the developer will post and maintain? Or better/safer yet, deny the project all together! It is just too risky!

Thank you for taking our concerns seriously. This project should NOT be approved. We have underlined questions which require a specific response from the City of Bellingham Planning Department.

Sincerely,

Roni Lenore, President  
The Unit Owners Association of Pacific Woods  
Aka: Pacific Woods Condominium Owners’ Association

Cc: Seth Fleetwood, Mayor, City of Bellingham  
Marcy McKay, Windermere Management  
PWCOA May 16, 2020 Minutes (attachment))

**Roni Lenore – Puget Neighborhood Resident**

**1342 Whatcom Street, Bellingham, WA 98229**

**510-435-4747**

**roni.lenore@gmail.com**

May 7, 2020

Kathy Bell, Senior Planner  
City of Bellingham, Planning and Community Development Department  
210 Lottie Street, Bellingham, WA 98225  
[kbell@cob.org](mailto:kbell@cob.org)

Rick Sepler, Director  
[planning@cob.org](mailto:planning@cob.org)

Bellingham City Council  
[cc@cob.org](mailto:cc@cob.org)

Dear Ms Bell, Mr. Sepler, and esteemed City Council Members,

As a resident of the Puget Neighborhood, I am aghast at the idea of the huge 308 bed, multi-story housing project which is being considered near the top of Nevada Street, east at Consolidation.

The project as depicted in the planning documents is way out-of-scale to the neighborhood. It will seriously dwarf the adjacent single-family homes. It appears designed for dormitory-style living (three bedrooms/bathrooms per “unit” with a single kitchen and presumably a bit of communal area). It is therefore way-out-of character for the neighborhood. The neighborhood is currently quiet and peaceful, and comprised of single-family homes. Adding 300+ students in a tower-like structure will add significant noise and congestion. And the parking situation will be a nightmare with way too few parking spots for the number of beds. All of this will negatively affect property values in the area which is not fair to the homeowners who live nearby. Bottom line, the project is not in keeping with the neighborhood character.

Disturbance of Wetlands: I understand that building this project will require major disturbance of, and building in, some of Bellingham’s Wetlands. The disturbance of underground springs, and the disruption of flora and fauna gives me pause given that I live in an Association just down the street where we are required to take care of our wetlands. If we remove anything, it is under supervision of an arborist, and we must replace any removed vegetation with an approved native species. We, in fact, undergo an annual review of our wetlands by that certified arborist. Has anyone asked what a certified arborist would say about the intrusion of a giant multi-story concrete monstrosity and adjacent impervious parking on pristine wetlands? The amount of toxic runoff from the parking lot is NOT in the City’s interest. If this is allowed to proceed, will CityView be required to go through annual review of its wetlands management?

Traffic: The added traffic up and down Nevada Street is also a major concern. Nevada is very narrow and hard to navigate even under the best of circumstances. Adding hundreds of additional

[Type here]

resident vehicles plus related service, delivery, and guest vehicles to this poorly conceived skinny arterial is a bad idea.

Disruption of the wetlands: I am also concerned about disruption of the hillside and how it will impact flooding and the flow of muddy debris onto the streets and into the storm water systems of down-hill residents. If allowed to go through, will CityView be required to undergo annual evaluation and cleaning of its storm water systems?

Bad bet financially: Finally, in this time of Covid, allowing this project to go through puts the City at considerable financial risk as the project may well fail. The need for housing has plummeted, and may stay lower for years with more on-line and fewer in-class learners. And, the project is not suitable for families due to the layout and the expense of renting by the room. Truly, CityView is essentially nothing more than a glorified rooming house which could be of great valuable in our downtown core where public transportation, restaurants and other services are readily available.

In summary, this project is not in the best interest of the city, the neighborhood, or the environment. There is NO win-win here unless someone is getting a kick-back which I like to think does not happen in our fair city.

Please do not allow this project! Preserve Puget Neighborhood's character, and find a more suitable place to students to live!

Thank you for carefully considering my concerns, and for sending this project to the dust-bin of history.

Sincerely,

Roni Lenore  
Resident, Puget Neighborhood

Cc: Seth Fleetwood, Mayor

**Aven, Heather M.**

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**From:** Susan <salishsue@gmail.com>  
**Sent:** Friday, May 8, 2020 11:10 AM  
**To:** G.Proj.City View  
**Subject:** public comment

To whom this may concern,

I'd like to register my concern that the current plans for the City View apartment complexes do not meet the building criteria for the project and they appear to clearly be another student housing project that does not fit with the established surrounding neighborhood.

Susan Silva  
1708 E. Lopez Court  
Bellingham, WA 98229

Sent from [Mail](#) for Windows 10

**Aven, Heather M.**

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**From:** Maggie Carrigan <nenac100@gmail.com>  
**Sent:** Friday, May 8, 2020 11:11 AM  
**To:** G.Proj.City View  
**Subject:** CityView

What a slap in the face to the residents of Bellingham. How disrespectful to ruin the property values of the surrounding areas where that monstrosity of a so called building is going to be built. Not to mention the demolition of a wetland that is supposed to be so precious to our way of life here. We have a wetland in the community I live in and we can't even remove or plant a tree without permission. Now I find someone can come in and totally destroy a large wetland with the permission of our officials.

Shame on the people who will be responsible for letting this happen. You should be following the plan for neighborhood housing, which will be bad enough, but not nearly as bad as what's going to happen.

Why can't the city buy this property and let it stay as it is supposed be. So your job and protect this neighborhood.

Maggie Carrigan

## Aven, Heather M.

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**From:** Tresa Mariotto <mariocart85@gmail.com>  
**Sent:** Friday, May 8, 2020 11:55 AM  
**To:** G.Proj.City View  
**Cc:** Bell, Kathy M.  
**Subject:** City view

We live on 44th street. Every morning I walk our dogs and count the "For Rent" signs in the two mile range we walk. There are 12. In a ten mile radius around our home there are apartments on Lincoln, Maple, Samish, James, Nevada, Ashley, Consolidation, Lakeway. The list is endless and does not include the homes the home that have turned into rentals. If one considers the intense building occurring at Cordata Bellingham must have thousands of units.

The traffic on Consolidation is horrible. Does anyone planning this understand that there are always cars parked along the side of the street and it makes it really unsafe for two cars to pass. 40-44th streets have no sidewalks or street lights. I counted 12 cars fail to stop in an hour span working from home.

Let's talk about Garbage I have attached the garbage from the complex on Ashley street. Which by the way is not full. I have seen the garbage piles blow all over on windy days! But it's not in your neighborhoods so you don't care. But the plan is to build hundreds of more units at the City view and on Elwood. What's wrong with you people is this planning or PURE GREED! You





are destroying Bellingham.





Who exactly is going to occupy these apartments after the pandemic ? It will take at least 2 years to fill. I hope they never fill serve you right. You are destroying the family home. Your not kidding anyone, no families can afford \$3000 apartments.

You should be ashamed of yourselves. #Noplanjustgreed!

Sent from my iPhone

## **Aven, Heather M.**

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**From:** Kevin Jenkins <kjenkins24@gmail.com>  
**Sent:** Friday, May 8, 2020 12:40 PM  
**To:** G.Proj.City View  
**Subject:** City View Proposal

May 7, 2020

### **Puget Neighborhood Association Board**

Kathy Bell  
City Hall, 210 Lottie Street  
Bellingham, WA 98225

RE: City View Proposal

**Dear Ms. Bell,**

The development of the Hawley property at 4413 Consolidation Avenue has been a troubling issue in the Puget neighborhood for years and the new City View development proposal is no exception. There are residents who are strongly opposed to the development and others who are supportive. The Board wants to be consistent and fair to all Puget Neighborhood property owners. We acknowledge the rights of property owners to develop their property in any way that is legal and within the City's Comprehensive Plan guidelines. The Board also supports the City of Bellingham's infill philosophy to help prevent urban sprawl and protect precious natural resources in Whatcom County.

As the City View development moved through the permit system, Puget citizens have been participating in that process. No proposal submitted to the City has automatic approval, and certainly one as complex as the City View proposal requires thoughtful consideration. The Board has been encouraging neighbors to participate in the process, and the Board shares in that obligation, both as individual citizens and as Board members who bring differing backgrounds and expertise to our positions. Therefore, we have prepared this response and included actions we believe are necessary before the proposal can be considered for approval.

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### **Process**

Adequate opportunity for public participation needs to be provided.

Perhaps 20 or more complex, technical documents have been revised by City View developer and submitted to the City, many as recently as the end of February, and perhaps some even into March. Changes seem to include significant Site Plan revisions, among other significant changes. The Date of Notice of Application that the Planning and Community Development Department (PCDD) had received the application was April 24. At that time, Planning and Community Development staff set the deadline (May 8) for public comments to the absolute minimum amount of time for a public comment period, 14 days. Notices were mailed to interested parties, but receipt and opening of mail is being delayed in our current pandemic.

Setting the public comment period to the absolute minimum fails to recognize the unique circumstances the public is facing. The public is distracted, and is dealing with life and death, and livelihood concerns, dating back to even when the developer submitted their latest revisions.

We are told that once the public comment period has been set, it cannot be changed for any reason, and regardless of any changes to the plan to process the application. But, PCDD's plan to proceed has been altered.

We are told the City will “accept” comments after May 8, but apparently these comments can’t be packaged into the materials presented to the Planning Commission and City Council for their consideration of the proposed development. City staff has advised, “The city recommends all parties wishing to comment on the proposal to do so by this (May 8) deadline.”

We understand the next step is a public meeting before the Planning Commission, at a future unknown date, sometime after May 31. Given issues of social distancing and restrictions for public gatherings, the form, format, and method of this meeting is unknown. It seems clear, whatever the method for the “meeting”, some members of the public will be excluded due to issues of technology, access, or just fear of exposure to a deadly virus. Some members of the public wanting to participate or show support for others, may not be able to do so.

It’s incumbent upon the City to reasonably provide for public participation. Given the modifications, extensions and exceptions already made by the City regarding this project, it seems process issues can be mitigated by the PCDD

**Action Items:**

- Require PCDD staff to accept, and present (or package) all public submissions with the materials provided to the Commission and Council for their consideration of this proposal. Submissions received up to 1 (one) week before the Planning Commission’s public meeting should be presented or packaged, and later submission accepted and included in the record as usual.
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## **Character**

Land Use Policies (LU-26 and LU-100) encourage developments that are in character with nearby surroundings. This large, high-density development is bordered on three sides by single-family residences. The developer is making efforts to mitigate the effects of inserting large multi-story buildings into these established neighborhoods, and we appreciate those efforts. However, the fact remains that the proposed development and use is out of character with its surroundings and will result in a loss of treasured green space identified by our Neighborhood Plan.

- Because the single-family residences west of the site were built on land zoned multi-family, there are no legal requirements for the developer to provide a buffer between the residences and the high-density apartment buildings. Despite their best efforts, the developer admits impact to near neighbors. For example, the SEPA Checklist states that the rear yard uphill views of approximately 11 homes on Nevada and Marionberry will be altered because of tree removal.

**Action Items:**

- Require the developer to install privacy fencing and plant mature trees to mitigate lost privacy for ALL residences abutting the development.
  - Consider a scaling down of the project to more closely align with the current character and appearance of the neighborhood.
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## **Traffic**

A primary assumption in the application and associated documents is that this will be housing mostly for students, one student per bedroom. However, if that assumption cannot be enforced, it calls into question the conclusions drawn in the Traffic Impact Assessment (TIA).

Traffic impacts are among our greatest concerns. We disagree with the estimates on amount and types of traffic generated in the Traffic Impact Assessment (TIA). We raise the following questions:

- There are 3 buildings totaling 106 units totaling 318 separate bedrooms with baths.

- Typical apartment traffic generation percentages were used as a basis for the study. We maintain that because of the proposed nature of the development, those percentages are inappropriate and should be revisited. The typical apartment standard assumes that not every occupant is an adult and therefore only a percentage of occupants will impact traffic. This development is planned to house one traffic-generating adult per bedroom. That is the standard which should be applied to any Traffic Study for this project.
- The TIA is based on the assumption that most of the residents will opt for using public transportation, primarily because they will be mostly WWU students who receive bus passes and live near bus access.
  - Is the assumption that the residents will be mostly WWU students valid? There are other colleges and learning institutions in Bellingham.
  - WWU authorities acknowledge that a significant percentage of WWU Students drive to campus and park on surrounding streets to avoid paying parking fees. Why would these students be any different?
  - Students do other things besides go to class. They seek recreation, they shop for groceries and supplies, and they frequently have jobs. They socialize and have guests. Those types of activities are less often done using public transportation.
  - Access to the bus facilities are 4-5 blocks away, over steep grades.
  - These bedrooms will be marketed to students with a greater-than-average ability to pay for housing. It follows that a greater-than-average number of them will have vehicles and choose to use them rather than use public transportation.
  - Residents are less likely to choose to use bicycles for transportation because
    - There are steep grades to traverse,
    - Automobile traffic along Lincoln and Samish Way is heavy, and dedicated bike lanes are not continuous along the expected route to WWU,
    - Intersections on Samish Way at 36<sup>th</sup> Street, and Bill MacDonald Parkway are not bicycle-friendly, and
    - WWU is in session during the rainier, colder months.
- Is this developer asking for a reduction in traffic fees based on the idea that the facility will be located in close proximity to “high frequency” (aka Go Line) transportation and be marketed primarily to students as was done in previous proposals? We do not feel that this is an accurate or valid argument to reduce fees.
- We believe that the TIA does not adequately address:
  - Traffic from the residence to Lakeway shopping, going down Nevada to the alley access to The Market plaza.
  - Impact on Byron Street, a more direct route to WWU than the one studied, not adequately addressed
  - 249 parking spaces does not appear to be adequate for 319 residents plus guests and employees. This is especially true if this project is to be marketed to “high end” students”. There is no overflow parking plan.
  - Impact of traffic islands that were installed on Nevada Street to slow traffic. Will this impede emergency and large vehicle access?
- We have concerns regarding the single entrance/exit onto Consolidation. While it may be designed to meet statute requirements, we are concerned that in times of emergency, it could quickly become blocked. Imagine 576 residents trying to escape a fire or landslide. No doubt they would use both sides of the access, blocking emergency vehicles from entering.

**Action Items:**

- Determine what guarantees can be extracted that all residents will be single students.
- Clarify the impacts based on the total number of residents proposed.
- Redo traffic study assuming one traffic-generating resident per bedroom.
- Include reasonable activities (shopping, recreation, etc.) in the number of trips generated per resident.
- Require builder to install a signed crosswalk at the cut-through from East Maple Street into the Park-and-Ride lot.
- Don’t reduce traffic impact fees significantly because residents will be near high frequency public transportation because it is presumed that they will be primarily using transportation to WWU. This does not cover all of the potential traffic impacts for this site.

- Require the developer to provide shuttle bus service to and from the Lincoln Street Park and Ride and local shopping. This would have the effect of increasing the number of residents who use public transportation.
  - Redo traffic study acknowledging residents will travel down Nevada and through the alley to The Market Plaza.
  - Require the developer to install improvements (sidewalks, gutters, lighting) to the unimproved sections of Nevada Street and the unimproved block on S 44th Street.
  - Include Byron Street intersections in the TIA.
  - Require a parking overflow plan.
  - Identify alternatives for a second entrance/exit from the development.
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## Geology

We are concerned that the geology of the site makes it potentially not safe for construction.

- The eastern slope of this property is identified as a landslide hazard on the City of Bellingham Geologic hazards map ([http://www.cob.org/documents/gis/maps/COB\\_Geohazards.pdf](http://www.cob.org/documents/gis/maps/COB_Geohazards.pdf)) Natural springs are also mapped for this site.
- According to the Geological Hazardous Site Assessment prepared by GeoEngineers for the previous proposed development, they indicate that they have only dug test pits to a depth of 10 to 12 feet
- The comments for TP-3, the test pit closest to the eastern boundary of the development indicates that rapid groundwater seepage was observed at 8 and 11 feet, moderate caving was observed from 7 to 11 feet and that disturbed soils were obtained from many levels of this pit. We would like to see more test pits performed, especially at the eastern boundary, and believe that those test pits should extend beyond the depths at which construction is to occur.
- We are concerned about the stability of the hillside, especially during construction. The GeoEngineers report indicates that the primary hazard will be from temporary conditions during construction and stormwater runoff prevention methods should be employed. They do not directly address the issue of disruption of perched groundwater aquifers, and possible contribution of these aquifers to soil stability and landslide potential, although these aquifers are mentioned elsewhere. We believe these issues should be addressed.
- Puget Street is an arterial, and access must be maintained. If stability of the hillside is compromised, we could lose the use of Puget Street for some time while repairs are made.

### **Action Items:**

- Dig more test pits, especially at the eastern boundary. Those test pits should be at least as deep as expected construction is to occur, and designed to establish secure footings.
  - Describe stormwater runoff prevention methods that will be implemented during construction.
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## Drainage

We believe that a full basin study of the Lincoln creek watershed needs to be conducted that appropriately determines the impact of this large development on that watershed. Downstream from this site, there is an existing stormwater management facility that directly impacts the homes of some Puget Neighborhood residents. Additionally, there is an area behind a commercial zone where the storm water apparently flows through a private system. We believe that the capacity of the entire system to handle potential impacts from increasing flows need to be evaluated. We believe that hydrological impacts on the adjacent wetlands deserve analysis. The underground detention vault is designed based on surface flow from new impermeable materials. Is it sufficient to also account for the seasonal springs that drain out onto the hillside?

- The stormwater site plan was prepared by a different firm than the one that did the geohazards work. This storm water plan appears to only address surface waters and apparently does not recognize any potential for

additional water collected as drainage from groundwater aquifers. We are concerned that the stormwater vault and rain garden will not have the capacity to handle this additional flow.

- In the process of applying future good engineering practices in the construction of this facility we believe it may be necessary to drain any perched groundwater aquifers encountered, in order to provide a stable platform for building. In doing so, it may be possible that construction disrupts the groundwater source that feeds the wetlands of the open space.

**Action Items:**

- Conduct a full basin study of how this development will affect the Lincoln Creek watershed.
  - Include the seasonal spring flows and groundwater aquifers that may be disrupted in specifications for the underground detention and rain garden.
  - Determine whether perched groundwater aquifers should be drained, and if draining them will disrupt the groundwater sources feeding the abutting wetlands.
- 

## **Puget Street**

It isn't clear in the documents submitted how the plans might affect Puget Street.

- Usually, developers are responsible to complete all abutting streets with curbs, gutters, and sidewalks. Because there will be no access to Puget Street, the developer seems to claim no responsibility for this road. However, Puget neighbors have talked about runoff and icy winter driving for years. There are no sidewalks, and pedestrians have to walk in the street, which is classified as an arterial. This might be a good opportunity for improvements to at least part of Puget Street.
- Residents are likely to lose pullouts they currently use for parking.

**Action Items:**

- Require developer to include improvements (sidewalks, gutters, lighting) for at least the part of Puget Street abutted by the development.
  - Detail changes resulting to Puget Street (including current pullouts).
- 

## **Consolidation Street and the Trail ROW**

We think the proposed trail to be built in the Consolidation Street ROW is very important, and it has been called out in our Neighborhood Plan.

- We've encountered a gap in understanding of responsibility between Public Works and the Parks Department relative to trails developed along rights-of-way. Construction and maintenance of the proposed trail should be clarified.
- Where will the trail end? If it ends on Puget Street, there is no pedestrian access, and it would terminate on an arterial that is without improvements.
- The proposed trail should provide for access to the recently-improved Samish Crest Trail.
- The trail should be designed for year-round access and maintenance.

**Action Items:**

- Identify funding for maintenance of the proposed trail.
  - Determine best trail design to minimize maintenance needs and guarantee full-year access.
  - The proposed trail should connect to facilities at Puget/Consolidation.
- 

## **Variations**

- No variance has been submitted for possible encroachment on the wetlands.
- No variance submitted for Puget Street and Consolidation Street build outs.

**Action Items:**

- Require the developer to submit missing variances before the proposal is considered for approval.

It is our desire to continue to have open dialog with our members, the City, and others concerned. We feel that we are in a unique position to ensure that people in the neighborhood have access to factual information regarding this project and other issues. We also strive to be a place where people can have a voice on any issue concerning their neighborhood. Please feel free to contact us if we may be of any assistance or if you have any questions.

Sincerely,

Kevin Jenkins, President

Puget Neighborhood Association Board

Douglas Gustafson, Steve James, Tammy Jones, Greg McKinney, Terri Marshall, and David Sparman; members

## Aven, Heather M.

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**From:** Alex McLean <dirthippie@gmail.com>  
**Sent:** Friday, May 8, 2020 12:37 PM  
**To:** G.Proj.City View  
**Subject:** Cityview apartments -- public comment

Public Comment regarding Cityview Apartments proposed development.

Submitted by:

Alex McLean, Bellingham resident

Please don't approve this proposal for the following reasons;

**1) The Geology:** The developed section under consideration, from reading the elevation demarcations on the site plan, has a drop of over 100 vertical feet from top-to-bottom. This is onerous stratigraphy for a development of this scale, under any conditions, and suggests to me that massive amounts of hydrostatic pressure from underground water will be constantly working to subvert the foundation and whatever fanatically engineered retaining wall is proposed to support the uphill slope.

Site disturbance will be significant, obviously, and even with outfalls and detention reservoirs designed into the build there seems an unruly amount of physics involved, to say nothing of wishful thinking, if the prospect of landslide subsidence is not considered for the very, very long term.

In the nearer term, the logistics of violently carving out a steep hillside in a region that gets 35-40 inches of rain per-year seems freakishly dangerous: I'm not sure how insurance premiums for the houses below will account for a D-90 front-end loader cartwheeling through their rafters.

**2) Wetland Hydrology:** While it is great that the developer is not using the full acreage, please do not assign this benevolence to generosity or some spasm of eco-consciousness.

The site is a nightmare for development at this scale: Aside from the cliff-like plunge from Puget to Nevada streets, the North end of the lot is an un-buildable swamp. Aside from the swamp and cliff, please note that access from Puget was considered and then rejected due to the engineering logistics involved in attempting to build a road into the site and the additional prohibitive costs of attempting to widen Puget with a required sidewalk dangling in outer space.

The corse of trees the developer proposes to "save," between Puget and the proposed apartments below, are only being retained because all the laws of physics and Keynesian economics cannot validate the cost of doing anything else there: It would be absurdly expensive to build anything abutting Puget; The City of Bellingham, for over a decade, has wrestled with the same mathematics in sporadic schemes to extend San Juan Boulevard (just South of the proposed site) due to the same gnarly geography -- aka, that damn cliff.

Whatever water is naturally migrating to the abutting wetlands and Critical Areas has, by now, been established and has metabolized the impacts of the existing development around it. That system of wetlands, however, will be altered by this development no matter what nifty pipes and engineered basins are installed under the buildings: You cannot snuggle five-story towers next to wetland habitats without long-term impacts. The EPA notes this in their analysis of water storage in forests and how downhill aquatic systems are impacted. Replacing an abutting mature forest with towers and retaining walls and parking lots will raise Hell with the subterranean water dynamics on this site even if the presumption is that every drop of water flows majestically straight downhill, which it doesn't.

<https://cfpub.epa.gov/ncea/risk/recordisplay.cfm?deid=296414&fbclid=IwAR1IHQu9255AQL7YhYMI49->

The hydrology will change.

"Saving" the uphill strip of trees is certifiably a good thing, yes, but development on this scale will alter the swamp to the North and will likely result in trophic unraveling of whatever free ecosystem functions and stormwater control it has been providing. (Note: This heading should also entail the obliteration of the existing stream, on Consolidation Ave, which I mention below in "Stormwater Impacts.")

**3) Greenways Trail Impacts:** It might not be terribly obvious to those who are not fluent in the long-term goals of the Greenways program, but for decades the City has been methodically purchasing tracts along Samish Crest with the long-term goal of stitching together a trail that goes all the way to Lake Padden and the recreational mecca of Galbraith Mountain.

I worry, since this project proposal clearly mashes as tightly as possible to the wetlands, that there will be an impossible pinch-point created if ever this vision of a connected trail is considered through this tract: The Critical Areas Ordinance, to say nothing of having to dogleg violently uphill, seems like it could be highly problematic if ever the swamp below and forest above are going to be available as an uphill connection to the trail on Samish Crest -- a portion of that trail is not far from where Puget smacks into Consolidation, at the top corner of this proposed development.

It might not even be viable as a North/South connector. But it would be a bummer if the prospect isn't at least considered for the long-term.

Also, just as a footnote to the larger design problems with this proposal; if a proper trail were to be installed, it might someday validate any of the currently non-existent arguments that suggest parking should be reduced since other transportation modalities are an option. They aren't an option if there is no trail. You cannot take people's cars away and just expect them to "figure it out."

**4) Stormwater Impacts:** There is, right now, a creek that follows the trajectory where a mythical Consolidation Ave might want to go up the cliff. On a rainy day the outfall spreads gravel and flotsam onto the street where it ends.

While Stormwater Impact Fees are surely accounted for in this development, it is worth pondering what happens when previously forested acreage, on more than a 100' drop, suddenly becomes an impermeable mass of asphalt and concrete.

I will predict that whatever downhill infrastructure COB and Public Works currently has in place will prove to be inadequate for the additional volume of water. Furthermore, as anyone who tracks climate science might know, the data strongly suggests that we are going to see an increase in anomalous rain events coupled with our inevitable slow incineration from temperature increases: We are going to get more big-ass storms. Has the City considered that a detention pond, likely down in the basin by Lincoln Street, may need to be installed if the natural permeability and ability to absorb rainwater is removed? Will taxpayers, years hence, be footing the bill if all the spiffy underground vaults and pipes on-site at this proposal become angry geysers and the houses and streets below the hillside are impacted?

(I know the current narrative among Public Works engineers is that vaults and other underground infrastructure have ZERO impact on downstream ecosystems and species. I'd like to see the science on that. I'd like to know, for example, what the enforcement regimen looks like for cleaning and maintaining those vaults -- which fill with road sludge and whatever vape pens and boogers wash off the street -- and if, in the decades that these large-scale projects exist, there has ever been cases where a storm surge scours out all that toxic snot and blows it into Bellingham Bay. Surely it happens often. The ecological decimation of Puget Sound, in and of itself, suggests that it does.)

**5) Housing and affordability impacts:** Whatever dark corner of Satan's rectum fermented long enough to birth the trend of "Dormitory Housing" here in Bellingham, it is sorely due for analysis and review -- it is time to pluck the bollus up and

hold it close for a good sniff.

These apartments will be rented and assigned rates for each bedroom, not for the square footage of the units themselves. Out-of-town investors, including sprawling realty consortiums that are traded on Wall Street, adore this model: Aside from being packaged with idiotic waivers that void parking and density codes, the scheme ensures maximum profit siphoned out of a local economy and the flexibility for developers to pin their rates to the most usurious possible benchmark -- the "market rate" per-bedroom.

In what world does that benefit the housing crisis here in Bellingham? How is this model improving home ownership, savings spent in local restaurants and shops, or expanding the range of housing options throughout the city? Any casual perusal of Craigslist can observe that, already, there are baked-in resources for people to split rent in a multitude of ways that are more than flexible enough to suit our population: "Roomates wanted" is one sub-heading: "Rooms for rent" is another.

By transferring the zoning gimmicks onto the public's shoulders (in the form of parking impacts and skewed density and heinously ugly buildings) the benefits only accrue to the private developers who, owning the buildings outright, can merrily tweak and bend the "market rate" of per-bedroom housing to suite the whimsy of their greed and lack of concern for a community they have, perhaps aside from filling out permits over a long weekend a few years ago, never given a single damn about otherwise. These are large-scale projects. They are spangling our landscapes now at alarming rates. But I've never once heard anyone from Planning or City Council explore what the impacts are to affordability when these absentee landlords decide, from an office somewhere in Houston or Hong Kong, to dial the most accessible entry-level costs of getting shelter up or down for no other reason than they can or they want to.

I think the entire scheme of "University" housing was concocted by quants in the realty kingdom who saw a town like ours as ripe for plunder and abuse as we writhed around with zero housing stock: We got sold the dream, but they aren't sharing the pipe.

As it pertains to this particular project, the City should be asking the simpler question of why a whole neighborhood should be required to suffer -- including in lost property values (also known as tax revenues, btw) -- just because Western Washington University has chosen to be utterly derelict in providing *ACTUAL* dormitory housing on their own gumption. If the spiffy idea was to simply metastasize the impacts of 12,000 students throughout neighborhoods, then mission accomplished.

**6) Parking and traffic impacts:** I've been on the site multiple times now and, whenever I go there, I envision what it will be like to have hundreds of added vehicle trips noodling through the roundabouts and odd street vectors of the neighborhood below. These are, for the most part, single-family homes. There is nothing whatsoever that informs of an architecturally logical place, anywhere nearby, for a series of five-story towers.

There is, for that same reason, nothing whatsoever that implies this is the sort of dense urban hub where apartment dwellers can just saunter to the store or local restaurants: It is surrounded by goddamn single-family houses on all sides, after all, and it isn't as though there's magically going to be room for bike lanes and bus connections at the site, nor any prospect that the houses will magically become retail outlets. They'll drive. All of them will drive.

I studied urban design and planning at WWU, eventually acquiring a Sustainable Design minor through Huxley. I was deeply involved in mayor Pike's "MyDowntown" design conferences. I've been a construction project manager on multiple sites throughout the city, including at least three projects that were five stories. I served a spell on the Transportation Committee a few years back and, as it pertains to non-motorized options, two terms on the Greenways Advisory Committee thinking about trails. I've occasionally volunteered with Sustainable Connections on various urban design meditations and campaigns, from stormwater mitigation to, more recently, the successful adoption of the ADU ordinance.

Throughout all of these endeavors there has been a recurring thematic syntax that invokes basic design vocabularies:

words like 'scale,' 'massing,' or 'infrastructure' are often woven into layers that consider access, public amenities, sustainability, and the other goals of so-called New Urbanism. The City, too, often prattles about these things through phrases like "The Triple Bottom-line" and "Place-making" and "Legacies and Strategic Commitments" that each, in their specific way, are supposed to define the thought and purpose for why we build stuff where we do.

I cannot name any metrics whereby siting these five-story towers in this location makes any goddamn sense. Cityview just fails on every level described by the City of Bellingham's own criteria -- it is so flagrantly out of context with the parameters and language broadcast by electeds and staff that, unless we knew any better, we'd have to assume nobody at all among these institutions has listened to themselves talk for the past decade.

Traffic, obviously, is going to be an issue on the roads weaving through these single-family neighborhoods. And, as much as I favor the ideal of making cars extinct through forced attrition, the parking models here are laughably delusional as well.

Just accounting for the massive excavation and foundation work that this jobsite will demand -- the hundreds of trips ferrying the dirt out and the concrete in -- should be sufficient to lobotomize resale values for any home within the orbit of dust and flatulent diesel trucks that will be rumbling by for months on end.

**7) Impacts to COB Long-term Density Objectives:** The City has been struggling, oftentimes mightily, to find inroads for density. With equal amounts of struggle and mightiness, they often are facing alarm and opposition to their schemes in the form of pissed-off neighborhoods.

There is an administrative campaign right now, for example, that aims to boost the proper application of density in areas zoned residential multi-family -- an effort to thwart builders from installing single-family homes on these tracts and, instead, build more units and more diverse housing types. Another example might be the on-going effort to introduce the Infill Toolkit into less dense areas, a goal that seems like it has been trundling along for years with limited success.

But, almost as if to undercut these sensible and progressive shifts in density, we also have malignant mutations like Cityview Apartments erupting in bizarre locations. Whenever depraved levels of density somehow make it on the zoning ledger -- such as Padden Heights or Chuckanut Ridge -- it effectively scuttles whatever trust and communication the public might have bothered to harbor with local government. The fissures last. They last in the form of roiling resentment and angst after a long and tedious fight pitting the public against remote millionaire developers and their paid lobbyists who waft around City Hall like bad cologne. They last far longer, of course, if the ass-ugly behemoths are built and allowed to mangle the community with blight and idiocy for time immemorial.

I'd caution against any ill-advised instinct to ram this turd through approval right now. There are other, better, ways to nudge density objectives forward. And, considering that the main thought pressing hard against anyone's mind nowadays has something to do with a global pandemic of a lethal virus, it might behoove leadership to not agitate citizens further with yet another outbreak of the Dormitory Housing strain that has already plagued us.

The smart move here would be to social distance this proposal back to Seattle, back to where these particular prospectors are from -- scrap it and tell them to bring something workable to the table in a few years.

Thanks, in advance, for denying this proposal before it goes any further.

-- Alex

## **Aven, Heather M.**

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**From:** Rebecca Belford <pcsrwba@yahoo.com>  
**Sent:** Friday, May 8, 2020 1:44 PM  
**To:** G.Proj.City View  
**Subject:** City View comments

To the Planning Dept.

I have the following questions concerning the City View development proposal on Consolidation St.

Each bedroom is a separate rental contract, there the number of rental units is 318. This type of housing targets the late teen to early twenties.

There are three steep hills between Lincoln and the City View complex. I don't think it is probable that these folks will walk up 3 steep hills carrying book and beer, laundry and food, especially during rainy and snowy days.

**Parking:** There is a short fall of 69 parking spaces. While I understand that it meets planning requirements it raises concerns for me, a home owner directly affected by this project. Our neighborhood streets are already clogged with parking. On occasion my driveway is blocked or partially blocked by cars. The garbage truck lifting arm cannot reach around these cars. This development has the potential of putting up to 80 more cars parking on our neighborhood streets. 9 included guests in this number.

1. What rights do I as a home owner have to preserve the parking space directly adjacent to my driveway for my use?

**Speeding:** This neighborhood has complained for years about the speeding. As the density has increased, so has the number of persons exceeding the 25 mph that our streets were designed for. The mail boxes are situated at the corner on Consolidation and 43rd st with no side walks.

1. will this project include speed limit signs and possibility a stop sign for the east going traffic at Consolidation and Nevada St

**Density:** This entire area is zoned medium density. We including me on several occasions have asked that the city justify putting a high density complex in side this zoning.

There are rumors of density borrowing because Nevada has single family homes on it, Nevada St St was developed under the Briarwood parcel and meets the medium density requirements. Therefore there is no density to borrow. City View falls into the Cedar wood parcel which has met the medium density development. The entire Hawley Farm property is zoned with a total medium density and has met this requirement. There is no density to borrow.

1. Please provide the justification in both soft language backed up by documentation that allows violating the comprehensive plan and medium density zoning.

Thank you Rebecca Belford  
813 Nevada St  
Bellingham WA 98229

## **Aven, Heather M.**

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**From:** Dr. Nabil Kamel <dr.nabil.kamel@gmail.com>  
**Sent:** Friday, May 8, 2020 2:43 PM  
**To:** G.Proj.City View  
**Subject:** CityView Comment

Dear City of Bellingham Planning and Community Development Director,

I am a professional urban planner and I have been teaching and practicing urban planning for over 25 years. I always advocate for residential and commercial infill whenever beneficial. I was greatly disappointed to learn that the City of Bellingham (CoB) Planning and Community Development Department is considering the CityView infill project in the heart of the Puget Neighborhood. I have great respect for the work the Planning and Community Development Department does for the city, and it is in this spirit and capacity that I offer the following insights. Given the shortcoming listed below, approval of this project exposes CoB to court challenges on several fronts. I urge you to take these considerations seriously.

### **The wrong project:**

Infill should NOT cannibalize urban green and open spaces. Good Infill does not take away precious little green space within a city and replace it with generic multi-family development. Rather, good infill consists of upgrading and increasing the density of *previously developed but under-utilized land* such as low-density commercial, strip malls, car dealerships, and the like. Good residential infill with multi-family development has to be accompanied by a mix of uses to include amenities needed by the added residents. This is why mixed-use development is the best infill practice. To accommodate the increased population density associated with infill development, these projects need to be accompanied by infrastructure and service upgrades. This project is slated for 106 3-bedroom units and parking for 249 cars on site. This means that when fully occupied there will be a minimum of 300 people moving in and out on the local residential streets, 249 cars driving in and out, and at a minimum an additional 30 to 50 cars trying to find street parking. I don't understand how anyone thinks this is a good project for the neighborhood.

### **The wrong place:**

The location for this project presents serious problems in terms of traffic. It is proposed on a narrow local streets over 3,000 feet (1 km) from Lakeway Dr., which already suffers from congestion as it is the primary connection to I-5. The added traffic on Puget St. and Consolidation Ave. will dramatically affect the quality of the neighborhood and the safety of pedestrians, especially children and elderly. I have yet to see a successful infill in the heart of a single-family residential neighborhood. Infill takes place first on the edges of low-density neighborhood where there is direct access to arterials and services. It does not "bomb" the heart of an established neighborhood with such a massive and incongruent project.

### **The wrong time:**

This may be one the biggest factors for rejecting this project. In the major economic downturn that we are experiencing, the worst in US history since the Second World War, and one that is expected to last for years, investments in real estate development face high uncertainty. There is a very high probability, almost certainty, that the proposed project will face difficulties in financing and marketing. This means a typical case of "arrested development" whereby the city and the neighborhood will see its open space destroyed and replaced by the dirt of an unfinished construction site for years to come. Ultimately, the city will end-up "making a deal" with the developer to finish the project by removing mitigation measures, downgrading amenities, waiving fees, providing subsidies, allowing higher

density, etc. The end result will be low-quality development and complete deterioration of the Puget neighborhood with no meaningful gains.

#### **Attack on protected an environmentally sensitive area:**

The proposed project presents serious environmental risks. The development is proposed on land within the Whatcom Creek watershed, which drains to Bellingham Bay. It directly impacts wetlands. It is unclear how the report by Miller Environmental Services finds no impact on wetlands. As you must know, wetlands have a protected buffer of 100 feet within which new construction, ground disturbance, and soil removal or fill should not be allowed without a conditional use permit and mitigation measures. This urban natural jewel is home to a rich bio-diversity of plants and animals. Moreover, the report callously suggests that because the developed area takes away “only” 50% of the forested area, it does not present any significant impacts on wildlife. Finally, and while the CoB notice and the report suggest that “approximately” 50% of the site will be cleared, the proposal shows the development affecting about 75% of the site. Given this precedent, there is no guarantee that the remainder will remain forested.

#### **Attack on social diversity:**

The Puget neighborhood is one of the most diverse neighborhoods in Bellingham, by every indicator – from ethnicity and race to age, income, and educational attainment. It is unfortunate that CoB would consider a project that undermines a neighborhood that has evolved harmoniously. While it is not unusual for developers to try to place controversial projects in areas with high levels of diversity because they think that such areas are less capable of resisting their plans and that elected officials are less likely to pay attention. I hope this is not the case in CoB. I know that my neighbors and myself stand united to oppose bad development that destroys the environment and the community.

#### **Death by a thousand cuts:**

We are all aware of the housing shortage, the high cost of living, and the overpriced housing in Bellingham. Expanding the housing stock is needed. However, what this project considers as infill is adding multi-family projects in a checker-board pattern in the heart of middle-class neighborhoods. As mentioned above this is not how it is done. What we are witnessing in Bellingham is the puncturing middle-class neighborhoods with projects that lower property values of adjacent homes. This, in turn makes new development more profitable and allows developers to prey on these properties. Eventually the entire neighborhood is gutted. This process falls under the labels of “creative destruction” (i.e. destroying existing investments to create new profits) or “accumulation by dispossession” (i.e. theft of the wealth accumulated in home equity).

#### **High geological risk from incomplete and inaccurate project documentation:**

The Geologically Hazardous Area Site Assessment provided for the project does not match the project current requirements. It was conducted in 2012 for a different project layout. Even as such, the report recognizes that extensive portions of the project take place in slopes of up to 50% but downplays the effects of erosion, and subsequent flooding and mudslide potential, especially with the loss of vegetation and increased impervious surface. Moreover, current test pit depths do not meet the minimum standard of 1.5 times the height of retaining walls. If approved, the CoB would be liable for subjecting Puget neighborhood residents to flooding and mudslide hazards.

#### **Failure to comply with due process:**

Due to the nature of this highly controversial project along with the combined need for meaningful public engagement on the project, addressing mitigation measures, and the social distancing and sheltering at home requirements related to the COVID-19 health crisis, I cannot see how the CoB can proceed. Local elections around the nation have been suspended or postponed to respect the true spirit of democracy. The CoB needs to have the same respect for democracy and citizen participation in this process.



**Aven, Heather M.**

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**From:** Kathleen Lee <kleekamel@gmail.com>  
**Sent:** Friday, May 8, 2020 2:44 PM  
**To:** G.Proj.City View  
**Subject:** Comments on CityView Proposal

Dear PCDD Director,

I am writing in opposition to the proposed CityView project. This project on 4413 Consolidation Ave is not good for the Puget Neighborhood. While I applaud the City for addressing affordable housing issue in Bellingham, the CityView project is not the right solution.

The large scale of this project in a primarily single family neighborhood will bring significant and unintentional challenges. Many residents in the neighborhood share my concerns regarding environmental, erosion of open space, traffic congestion, public safety, and other concerns.

I strongly encourage the City to reevaluate the project in the context of uncertain economic and social environment we are currently facing. Affordable housing problem should be addressed in a comprehensive approach. I urge the City and its leaders to reject this project at this time and reengage the broader community in a productive and transparent process to develop solutions that benefit all residents.

Sincerely,  
Kathleen Lee  
4429 Marionberry Ct  
Bellingham, WA

**Aven, Heather M.**

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**From:** Jean Lee <moleskinandcoffee@gmail.com>  
**Sent:** Friday, May 8, 2020 2:48 PM  
**To:** G.Proj.City View  
**Subject:** Strongly Disapprove Plans for City View Proposal

To Whom It May Concern,

My name is Jean Lee, and I'm a resident at 237 S 42nd St. in Bellingham. I walk my dogs everyday on Nevada Street, where I saw your land use permit public notice on Nevada St. and Consolidation Ave.

I am writing about the proposed residential multi-family project north of Consolidation Ave. between Puget and Nevada Streets in the Puget neighborhood. I strongly disapprove of the proposal because the proposed development would profoundly change the neighborhood's quiet environment for the worse. This is a neighborhood with predominantly single-family homes, and this ensures traffic is kept to a minimum, which keeps the neighborhood quiet and safe for pedestrians and residents. I cannot see how increasing the traffic and number of people in this area would preserve this atmosphere. Also, I am strongly concerned about the deforestation that would attend this development, especially as it is so close to the trail above it. I would prefer the city to conserve the wooded areas around the trail as a public service.

I am disappointed by this proposal for it doesn't take into consideration the quiet and safe neighborhood environment that is currently appreciated by the Puget neighborhood. Do not go forward with the proposal.

If you would like to contact me with follow-up questions or concerns, please contact me at this email address.

Sincerely,  
Jean Lee  
Samish Hill Neighborhood resident

May 8, 2020

Jill Jacobsen

852 Nevada Street

RE: CITY VIEW COMPLEX COMMENTS

### Parking and residential home values

I am the owner of a home on Nevada Street close to the top of Consolidation Avenue. This is a family neighborhood with many little children. Many neighbors walking their dogs, jogging, cycling and pushing baby carriages.

There has been a very extensive problem with lack of parking in our neighborhood for years.

This is a major issue which includes:

- Cars parked on the road, there is no sidewalk, so they just park with the car jutting out into the street. This is a major hazard because this narrows the actual street you can drive on.
- Cars parked for weeks on end, illegal after 72 hours! and often abandoned and must be towed off.
- Cars are parked right at the corner, so the visibility is extremely low and dangerous when you are trying to drive around the corner.
- The roundabout at Marionberry and the other cement blocks that were put in last year have not been the least bit effective slowing the traffic down. In fact, once they drive around or over the roundabout, they speed up even faster than previously. Luckily, they have not hit any of the many illegal skateboarders coming down the middle of the road.
- The stop sign at Consolidation and Nevada is pretty much ignored. So many of our neighbors have nearly been broadsided at this corner, including myself.

- This student dormitory complex has 318 bedrooms. Since most students have one or two roommates, rules or no rules, there could possibly be up to 500 students living there, most with cars. The parking on-site is not sufficient to handle all these cars, so they will be on the street.
- The City cycling path recently put up Nevada Street and down Ashley will also be a dangerous cycling situation.

This construction project could take up to a year. All the construction vehicles will be driving on Nevada Street, Consolidation Avenue or South 44th Street. This is going to be an extremely busy bottlenecked street situation. The garbage trucks, delivery trucks and school buses can barely navigate the street. Also, add the people who park on an angle right on the corner to pick up their mail.

The situation with noise, littered beer cans, car break-ins, discarded mattresses, sofas, and other furniture is extremely atrocious now. It will be a lot worse if this complex proceeds.

I am also genuinely concerned about the value of the homeowner's property. Any potential buyers will know about the complex being built and of course that will deter them from purchasing a home here. The values of all our homes will plummet.

Would you like to buy a house in our neighborhood? Does anyone on the city council or the Planning Commission live in this neighborhood. Would anyone want to buy a house here while this is all going on? I think not.



ROAD  
WORK  
AHEAD

**Aven, Heather M.**

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**From:** Kathy Taylor <kataylor.alaska@gmail.com>  
**Sent:** Friday, May 8, 2020 3:17 PM  
**To:** G.Proj.City View  
**Subject:** CityView/GEOHAZARD testing  
**Attachments:** Video.MOV; Video\_1.MOV

I am attaching videos of the standing and running water in my back yard @814 Nevada St this last winter 2019-2020. The hillside behind me has changed over the past 4 or 5 years and I now get much more flooding in my yard as shown in the attached videos.

Also, please note THERE ARE TREES ON THE HAWLEY PROPERTY THAT SRE NOW LEANING OVER MY BACK FENCE.

A new GEOHAZARD Study NEEDS to be done - NOT during the current dry season but during the rainy fall, winter or early spring.

Kathy Taylor

814 Nevada Street

Sent from my iPhone

## **Aven, Heather M.**

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**From:** Terri Marshall <termites1@gmail.com>  
**Sent:** Friday, May 8, 2020 3:36 PM  
**To:** G.Proj.City View  
**Subject:** Objection to Cityview

I am writing to give my strong objections to the Cityview development. The development is way out of character to the rest of the neighborhood. For those home owners in the Puget Neighborhood who spent their hard earned money to purchase a home in a nice neighborhood with expectations that eventually more homes would be built around them, were taken by surprise when a purposed college dormitory would be built looming over their backyards. I know that the City Council members nor the developer would want this type of development in their back yards.

The traffic study did not take into consideration the traffic that would be added to the lower part of Nevada Street. We already have a college house with up to 13 boys living in it with lots of cars and a construction company with construction trucks coming all day long seven days a week in our neighborhood zoned Single Family. The added traffic on our narrow poorly lit street as residents from the new development drive down to Lakeway to go to sports activities, the lake, Whatcom Falls Park, Whole Foods restaurants, down town and other such destinations needs to be taken in to consideration.

Thank you,  
Terri Marshall