

## 3.8 RELATIONSHIP TO PLANS AND POLICIES

This section compares the Preferred Alternative and Straight Street Grid Option and evaluates their consistency with the relevant plans, policies and regulations identified in the *2008 New Whatcom Redevelopment Project Draft EIS (DEIS)*.

### 3.8.1 Draft EIS (Alternatives 1 – 4)

The DEIS evaluates the consistency of the DEIS Alternatives (Alternatives 1 - 3 and the No Action Alternative) with several relevant plans, policies and regulations, including state, county and local documents. Key plans that are evaluated in the DEIS include the following:

- Washington State Growth Management Act (GMA)
- Washington State Shoreline Management Act (SMA)
- Whatcom County County-Wide Planning Policies
- Port of Bellingham Comprehensive Scheme of Harbor Improvements for Squalicum Harbor
- Waterfront Futures Group Vision
- Port and City Interlocal Agreements
- Waterfront Advisory Group Strategic Guidelines
- Port and City Draft Framework Plan
- City of Bellingham Comprehensive Plan
- City of Bellingham Shoreline Master Program (SMP)
- City of Bellingham Land Use Code
- City of Bellingham Critical Areas Ordinance
- Bellingham Bay Demonstration Pilot.

In general, DEIS Alternatives 1 - 3 would be consistent with applicable state and local plans, policies and regulations. The No Action Alternative, given its assumption of redevelopment with industrial uses, would be less consistent with many of the policies identified through the City/Port Joint Planning Efforts and the City's Comprehensive Plan, which call for redevelopment of the New Whatcom site with a mix of uses and public access features. Refer to DEIS Section 3.8 for further details on the DEIS Alternatives and their consistency with relevant plans, policies, and regulations.

### 3.8.2 Preferred Alternative

The Preferred Alternative is intended to be a medium density, sustainable development that features: a diversity of uses that are complimentary to the downtown Bellingham Central Business District (CBD) and surrounding neighborhoods; an infrastructure network that integrates with and connects the waterfront to surrounding areas; and a system of parks, trails, and open space that provides substantial waterfront access opportunities to the community. Levels of redevelopment under the Preferred Alternative would be within the range of redevelopment assumed for the DEIS Alternatives and would mix and match elements of DEIS Alternatives 1 and 2. For example, the redevelopment density under the Preferred Alternative would be comparable to DEIS Alternatives 2/2A (up to 6 million square feet of office, institutional, marine industrial, residential, and retail uses) and the amount of parks, trails, and open space would be similar to DEIS Alternative 1 (approximately 33 acres).

The Preferred Alternative is based on a modified street grid for long-term redevelopment of the Waterfront District. The new grid would be rotated at the top of the bluff that currently divides the Waterfront District from the existing downtown in order to provide efficient connections to downtown, opportunities for formal view corridors and other surrounding areas and cost-effective engineering solutions for bridging the bluff and BNSF railroad corridor.

The Preferred Alternative represents a further refinement of the DEIS Alternatives in the following key areas. These refinements are applicable to the Preferred Alternative's relationship to certain relevant plans, policies, and regulations:

- Redevelopment density and mix of uses
- Infrastructure network and road system
- Parks and shoreline habitat plan
- Sustainable "green" design strategies
- Historic structures
- View corridors
- Development regulations.

The following section provides a summary of each of these refinements under the Preferred Alternative and discusses their relationship to the analysis of the DEIS Alternatives and consistency with the key plans, policies, and regulations identified in the DEIS. The discussion focuses on the specific features of the Preferred Alternative that represent additional information related to consistency. Certain plans, policies and regulations evaluated in the DEIS are not directly referenced below. The relationship of the Preferred Alternative to these plans, policies and regulations would be the same as that addressed under the DEIS Alternatives. Refer to **Chapter 2** of the SDEIS for further details of each of the refinements listed above and DEIS Section 3.8 for further discussion of specific plans, policies and regulations.

## Redevelopment Density

Levels of redevelopment under the Preferred Alternative would be within the range of redevelopment assumed for DEIS Alternatives 1 - 3 and would mix and match elements from Alternatives 1 and 2. The Preferred Alternative would include a total of 6.0 million square feet of new uses in 2026. Overall redevelopment density would be similar to DEIS Alternative 2. The Preferred Alternative would include less area in residential uses and increased amounts of office, institutional, and light/marine industrial uses. The Preferred Alternative would also include 33 acres of parks, trails, and open space, which would be similar to DEIS Alternative 1.

The proposed redevelopment density and mix of land uses under the Preferred Alternative would be consistent with the City of Bellingham Comprehensive Plan Framework Goals and Policies identified in the DEIS, as well as the following Comprehensive Plan goals and policies of the Land Use, Community Design, Capital Facilities and Housing Elements: FLU-2, FLU-15, LU-84, LU-149, LU-126, LU-74, LU-79, CDG-4, CDG-15, CDG-17, CDP-6, HP-6, HP-20, and HP-23 (see Section 3.8 of the DEIS for details on these goals and policies). In general, these policies call for infill development, providing new waterfront parks and community gathering places, a range of job and housing opportunities, and an infrastructure system that supports redevelopment. The policies also call for development that promotes the efficient use of land, reduces sprawl, encourages alternative modes of transportation, promotes healthy neighborhoods and maintains Bellingham's sense of community. Mixed use development

should be integrated into urban villages and provide a focal point for commercial, civic and recreational activities within the neighborhood.

## Roadway System

The roadway system under the Preferred Alternative is based on a modified street grid for long-term redevelopment of the Waterfront District. Extensive infrastructure improvements are proposed to provide capacity to accommodate redevelopment. The onsite roadway system north of the Whatcom Waterway under the Preferred Alternative would be similar to DEIS Alternatives 1 - 3. The key new offsite roadway connections to the existing street network under the Preferred Alternative would be similar to those identified under DEIS Alternative 2 except that there would be no new bridge connection at Laurel St., a new bridge connection would be constructed at Cornwall Ave./Log Pond Dr., and a roundabout is proposed at Wharf St./N State St. Street types onsite would include industrial, retail, residential, arterial, green, park, residential park streets that are intended to both functionally serve vehicle traffic and provide efficient pedestrian and bicycle opportunities. Commercial St. is identified as a “Green St.” under the Preferred Alternative and would include a park and pedestrian facilities within a 220-foot wide right of way; Ivy St. is identified as a “Park St.” and would include a park and pedestrian facilities within a 200-foot right of way.

The roadway system under the Preferred Alternative would be consistent with the City of Bellingham Comprehensive Plan goals and policies of the Transportation, Capital Facilities and Community Design Elements, including TV-2, TG-32, TV-7, TG-9, TG-10, TG-13, TG-19, TG-50, TP-58, TG-61, TP-63, TP-64, TP-73, TP-75, TP-78, CDG-19, CDG-21, CDG-23, CDP-59, CDP-64, and CDP-65 (see Section 3.8 of the DEIS for details on these goals and policies). In general, these policies call for a system of streets that can functionally accommodate growth, emphasize multiple transportation modes and linkages, and also encourage safe pedestrian and bicycle activity, thereby reducing dependency on automobiles.

## Parks and Shoreline Habitat Plan

The Preferred Alternative would include approximately 33 acres of parks, trails, and habitat areas by 2026. The proposed parks, trails and habitat areas would be similar to those assumed under DEIS Alternative 1. However, some refinements to the parks and trails layout under the Preferred Alternative would include changes to the trail system in the Marine Trades Area, the configuration of parks and trails in the Downtown Waterfront Area, and the inclusion of “community green” areas as public gathering places.

The overall approach to redevelopment of the shoreline environment under the Preferred Alternative would be similar to DEIS Alternatives 1 - 3. The Preferred Alternative includes a more specific definition of the shoreline habitat plan for the Waterfront District. Two major types of shoreline habitat areas are incorporated in the Preferred Alternative including, nearshore habitat and fringe habitat. See **Section 2.3.4** of Chapter 2 and **Figures 2-7** through **2-13** for further details on these habitat areas.

Under the Preferred Alternative, the proposed parks, trails and habitat areas would be consistent with the City of Bellingham Park, Recreation and Open Space Plan policies identified in the DEIS, as well as Comprehensive Plan goals and policies of the Land Use, Community Design and Capital Facilities Elements, including CFV-9, CDG-2, CDG-9, FLU-6, LU-84, LU-127, and LU-146. In general, these policies call for the development of an integrated network of

parks, trails and open spaces as part of new development, while also encouraging public access to the waterfront and protecting shoreline areas. In addition, the proposed shoreline environment and habitat areas under the Preferred Alternative would be consistent with the staff-recommended update to the City of Bellingham 2008 Shoreline Master Program (currently in process), including provisions related to building height, buffers and access (see Section 3.8 of the DEIS for details on these goals and policies and **Section 2.3.4** of Chapter 2 of this SDEIS for information on the Shoreline and Habitat Plan of the Preferred Alternative).

## Sustainable “Green” Design

As part of the Preferred Alternative, the Port has further defined the potential sustainable design features that could be incorporated into redevelopment of the site. These could include: water conservation (i.e. reclaiming/reusing water for non-potable uses), energy generation (i.e. solar power, ocean power, wind power, micro hydro power, biomass energy, and/or mining waste heat), greenhouse gas emission reduction (i.e. implementing compact development and efficient transportation systems), wastewater treatment (i.e. via membrane bio reactors), and stormwater management strategies. The proposed stormwater management concept is also intended to introduce specific LEED certified elements into the project. See **Section 2.3.6** of Chapter 2 of this SDEIS for further details.

Sustainable design features that could be incorporated as part of the Preferred Alternative would be consistent with the following City of Bellingham Comprehensive Plan goals and policies of the Land Use, Capital Facilities, and Utilities and Services Elements: LU-33, LU-106, CFG-6, CFG-7, CFG-11, CFP-40, CFP-41, CFP-44, CFP-50, CDP-58, PUP-18, PUP-19, PUP-20, and PUP-21 (see Section 3.8 of the DEIS for details on these goals and policies). In general, these policies encourage energy efficient site and building designs and LEED principles in new developments, and encourage the development of stormwater systems that improve water quality, minimize runoff and protect fisheries and habitat.

## Historic Structures

Under the Preferred Alternative, the same five buildings noted in the DEIS could potentially be retained or reused in some capacity as part of redevelopment of the site. The Preferred Alternative also identifies five additional buildings that could potentially be retained, reused or relocated/preserved in some manner, including: the Old Granary Building, the Barking and Chipping Plant, the Boardmill Building, the Digester Buildings, and the High Density Tanks. Additional analysis would determine the viability of reuse/relocation, with consideration of structural, economic, environmental and locational factors.

The potential retention, reuse, or relocation/preservation of historic structures under the Preferred Alternative would be consistent with policies FLU-2 and LU-69 from the Land Use Element of the City of Bellingham Comprehensive Plan (see Section 3.8 of the DEIS for details on these goals and policies). These policies encourage the development of a unique, attractive and economically viable city center that reflects Bellingham’s history and natural setting, and maintains Bellingham’s sense of community.

## View Corridors

No view corridors were specifically identified in the DEIS; however, under the Preferred Alternative, the Port has identified formal view corridors through the site. The Preferred

Alternative is intended to preserve and enhance visual connections to Bellingham Bay, the Whatcom Waterway, and the waterfront from the New Whatcom site, the CBD, Old Town and the Lettered Streets areas. Two types of view corridors have been identified for the Preferred Alternative, including: view corridors defined by rights-of-way and open space; and view corridors defined by a combination of rights-of-way and building height limitations. See **Section 2.3.8** of Chapter 2 of this SDEIS for further details.

The proposed view corridors identified for the site under the Preferred Alternative would be consistent with the following goals and policies from the City of Bellingham Comprehensive Plan Land Use and Community Design Elements: CDP-16, LU-53, and LU-55 (see Section 3.8 of the DEIS for details on these goals and policies). These policies generally call for new development to optimize scenic views of Bellingham Bay, the San Juan Islands and other important natural features.

## Development Regulations

As part of the Preferred Alternative, the Port has developed a preliminary set of Development Regulations for the New Whatcom site (see **Appendix D** of this SDEIS). These preliminary regulations describe more specific requirements for the types of permitted uses, project density, building heights, and other general standards (i.e. parking, shoreline setbacks, view corridors, landscaping, and street level uses) for each redevelopment area of the site. The regulations will continue to be refined by the Port and City through the master planning process, and will be reviewed by the Bellingham City Council. These regulations would ultimately be adopted as part of the overall regulatory framework for the project and would guide long-term development of the site, along with the Master Development Plan (Subarea Plan), Development Agreement and Planned Action Ordinance.

### 3.8.3 Straight Street Grid Option

The Straight Street Grid Option is assumed to have a similar mix of land uses, density, parks, trails and open space to those described under the Preferred Alternative, and would therefore, also be consistent with the applicable plans, policies, and regulations noted above. The key differences between the Straight Street Grid Option and the Preferred Alternative would include: the orientation of the street grid and its connection to downtown and adjacent areas; the assumed retention of certain historic structures; the assumed building heights; and, the assumption of view corridors along road right-of-way.

## Roadway System

The Straight Street Grid Option would feature a rectilinear roadway system that would be similar to DEIS Alternatives 1 - 3. However, there would be no 5-legged intersection at Laurel St./Commercial St./Log Pond Dr., the Commercial St. bridge would not be provided, a reconstructed bridge would be provided at Cornwall Ave. and a roundabout would be constructed at the Wharf St./State St. intersection. This roadway system is intended to serve as an extension of the downtown road grid. It is assumed that the Straight Street Grid Option would not include "Green Streets" or "Park Streets" as part of the roadway system.

Similar to DEIS Alternatives 1 - 3, the roadway system under the Straight Street Grid Option would be consistent with the specific goals and policies of the Transportation Element identified in the DEIS, as well as other applicable goals and policies from the Comprehensive Plan Capital

Facilities and Community Design Elements. It should be noted that the results of the Transportation Analysis (refer to **Appendix M** of this SDEIS) indicate that the road network and set of access improvements assumed under this Option would not have capacity to accommodate full redevelopment of the site up to 6 million square feet; additional access improvements/connections or other measures would be required. Under the Preferred Alternative adequate capacity of the assumed road network is available to accommodate full redevelopment. Therefore, this Option could be perceived as providing a less than comprehensive road network to accommodate growth.

## Historic Structures

The Straight Street Grid Option assumes the retention/reuse of the same ten structures identified under the Preferred Alternative and also includes the retention/reuse of an additional three structures. These structures include: the Steam Plant, the Alcohol Plant, and the Pulp Storage Building.

Similar to the Preferred Alternative, the Straight Street Grid Option would be consistent with the applicable policies in the City of Bellingham Comprehensive Plan Land Use Element, including FLU-2 and LU-69. The potential retention or reuse of additional historic structures under the Straight Street Grid Option would provide further emphasis on consistency with these policies.

## Building Heights

For the purposes of the SDEIS, it is assumed that all buildings on the New Whatcom site would be subject to a 75 foot height limit under this Option. While it is assumed that the 6 million square feet of overall density could be achievable, a 75-foot height limit could result in a pattern of building development that is more uniform in character, with less variety in height and building design and less opportunity for additional open space areas between buildings (beyond the 33 acres) as part of future development (see **Section 3.10** Aesthetics for more information on building character). Building modulation and/or upper level building setbacks could be included as part of development regulations, as was assumed for the Preferred Alternative, however.

The uniformity of building character that could result under the Straight Street Grid Option would differ from both the DEIS Redevelopment Alternatives and the Preferred Alternative and could be perceived as being less consistent with certain Comprehensive Plan Community Design Element goals and policies, including CDG-8 and CDP-19. In general, these policies emphasize that the bulk and mass of downtown buildings should be recognized as a positive aspect of urban design and that creative proposals that are consistent with design guidelines should be encouraged.

## View Corridors

The Straight Street Grid Option includes opportunities for views towards Bellingham Bay and the waterfront from the site, the CBD and surrounding areas, similar to those included under DEIS Alternatives 1 - 3. Primary views towards the Bay and the Whatcom Waterway would occur along the onsite road rights-of-way, intended to serve as a continuation of the existing rectilinear grid in the downtown area. Less view opportunities from onsite buildings to the Bay and other distant viewpoints could potentially result due to the uniformity of heights to achieve the overall density. This could result due to the need to retain more developable land on site for buildings than under the Preferred Alternative (which would feature higher maximum height

limits and a range of building heights to achieve 6 million square feet); to achieve the same total density more land would be needed.

The view corridors included under the Straight Street Grid Option would be similar to DEIS Alternatives 1 - 3 and would also be consistent with the applicable plans and policies identified in the DEIS. However, potentially decreased opportunities for views from the site to the water could be perceived as resulting in less consistency with certain Comprehensive Plan policies of the Land Use and Community Design Elements when compared to the Preferred Alternative.