

## 3.11 HISTORIC AND CULTURAL RESOURCES

This section characterizes existing historic and cultural resource conditions on the New Whatcom site and in the site vicinity, and identifies the potential for impacts to these resources under the EIS Alternatives. This section is based on the December, 2007 Historic Property Resources Technical Report prepared by Artifacts Consulting, Inc (see **Appendix L**) and the December, 2007 Cultural Resource Assessment prepared by Northwest Archaeological Associates (see **Appendix M**).

### 3.11.1 Affected Environment

#### Background Information

##### Regulatory Overview

Federal, State and City of Bellingham regulations and processes govern the designation of historic and cultural resources in the City of Bellingham. The National Register of Historic Places (NRHP) is the official federal list of districts, sites, buildings, structures and objects significant in American history, architecture, archaeology, engineering and culture. Eligible properties must be at least 50 years old, possess integrity of physical characteristics, and meet at least one of four criteria of significance. These criteria include: 1) the property is associated with events that have made a significant contribution to the broad patterns of our history; or 2) the property is associated with the lives of persons significant in our past; or 3) the property embodies the distinctive characteristics of a type, period or method of construction or represents the work of a master, or possesses high artistic values, or presents a significant and distinguishable entity whose components lack individual distinction; or 4) the property has yielded, or is likely to yield, information important in prehistory or history. See **Appendix L** for detail on the NRHP as it relates to historic buildings/structures and **Appendix M** for detail on the NRHP as it relates to cultural (archaeological) resources.

Within the State of Washington, the Department of Archaeology and Historic Preservation (DAHP) is responsible for conservation, preservation and protection of Washington's historic and archaeological resources and prohibits disturbance or excavation of historic or prehistoric archaeological resources on state or private land without a permit. In addition, state laws and regulations prohibit knowingly disturbing a Native American or historic grave sites (RCW 27.44) and states that records, maps, or other information identifying the location of archaeological sites are exempt from disclosure in order to prevent looting or depredation of such sites (RCW 42.56.300). The DAHP is also responsible for issuing formal opinions on the significance, eligibility and impacts to sites of historic significance. The DAHP maintains the official state list of historic places, termed the Washington State Heritage Register (WHR). See **Appendix L** for detail on the DAHP as it relates to historic buildings/structures and **Appendix M** for detail on the DAHP as it relates to cultural (archaeological) resources.

Within the City of Bellingham, Chapter 17.90 of the Bellingham Municipal Code provides legislation to establish and regulate landmarks, landmark sites, historic special review districts, and conservation districts and identifies criteria for description of sites, objects, buildings and districts for preservation. Sites meeting any or all of the designation criteria would be considered by the Bellingham Historic Preservation Commission (BHPC). The BHPC reviews and recommends to the City Council that a site be registered, which is then achieved by resolution;

these historic sites are listed on the Bellingham Local Landmark Registry (BLLR), the official historic registry of the City of Bellingham.

### Site History

The New Whatcom site is located on Bellingham's waterfront, along Bellingham Bay; the area comprising the site historically consisted of tideflats, with the shoreline generally corresponding with the bottom of the bluff area. Dating back from pre-history to the 19<sup>th</sup> century, the Bellingham waterfront was traditionally occupied by ancestors of the present-day Lummi Nation and Nooksack Indian Tribe. The settlement and subsistence of communities throughout this region were similar in many ways, primarily in their seasonal cycle of congregation at winter villages. Winter villages at marine-oriented communities, such as the Lummi, were usually located along protected coastlines, where activities such as shellfish gathering and fishing could be pursued.

Winter villages recorded along Bellingham Bay were near Portage Bay and the present-day mouth of the main Nooksack River channel, both west of the site, and near the mouth of Squalicum Creek, approximately four miles northwest of the site. Several traditional Lummi and Nooksack village and camp sites have been recorded in the site vicinity, including: on the northwest side of the mouth of Whatcom Creek; near the mouth of Squalicum Creek; near the town of Marietta; and, along the present-day main channel of the Nooksack River at Fish Point (refer to **Appendix M** for more detail on pre-history and Tribal communities in the area).

From the time European settlement took hold on Bellingham Bay during the 1850s, the Bellingham waterfront has been used as a shipping and industrial area. The first industrial uses were centered on the Whatcom Waterway where the falling water from Whatcom Creek provided gravity power for early saw mills and the channel enabled sailing vessels to traverse the shallow mud flats. In 1853, Henry Roeder and Russel Peabody established the small community of Whatcom (at the mouth of the Whatcom Creek) as the site for their saw mill operations. The establishment of this mill was quickly followed by other development including small mills, buildings and piers. Additional development of the Colony Mill in 1881 resulted in a long wharf being constructed to bring lumber carrying vessels closer to the estuary below the falls. The Old Colony Wharf eventually became the Whatcom Wharf, and served as the primary water gateway into the City of Bellingham. By 1891, the Great Northern Railroad completed an over-water trestle that carried tracks on an arc over the tidelands. The Whatcom wharfs and additional wharfs were constructed to extend to the trestle, creating the linear grid that currently exists in the harbor area.

During the early 1900s, the Army Corps of Engineers undertook a project to widen and deepen the Whatcom Waterway to accommodate new types and sizes of vessels and allow ships to dock closer to the city's waterfront. The waterway dredge trailings were used to create new industrial real estate along the south shore and north bank of the waterway (generally representing the current location of Redevelopment Areas 1-9). By 1906, the Bellingham Bay Improvement Company (BBIC) had constructed a sprawling lumber mill, wharfs and piers that all faced the Whatcom Waterway. In 1913, the BBIC sold the mill to the Bloedel Donovan Company and the mill became a flagship operation for an international lumber empire.

In 1918, the City of Bellingham constructed a Municipal Dock on the south side of the entrance to the Whatcom Waterway. By 1924, this dock was transferred to the newly established Port of Bellingham. The Municipal Dock was later renamed the Bellingham Shipping Terminal.

In 1938, the Puget Sound Pulp and Timber Company began its operations on the platted mud flats of the south bank of the Whatcom Waterway. In an effort to accommodate large freight vessels and increased traffic associated with the Puget Sound Pulp and Timber Company, the Port significantly invested in the area around Municipal Dock. In 1947, the Port acquired the Bloedel Donovan mill site (generally representing the current Redevelopment Area 10), which was later filled and graded for industrial leases. By 1949, the Puget Sound Pulp and Timber Company was perhaps one of the most productive, efficient and visually elegant wood pulp production facilities in the world (Artifacts, 2007).

The capacity of the Whatcom Waterway was expanded significantly in 1962 with the lengthening of the Port dock, dredging on the west front and filling on the south to create additional storage yards. In 1963, the Puget Sound Pulp and Timber Mill was sold to the Georgia-Pacific Corporation a growing wood products conglomerate that already controlled plywood mills in Bellingham. Georgia-Pacific expanded the operation to include paper and tissue manufacturing onsite. They also physically changed the complex over the next 25 years to absorb virtually the entire south Whatcom Creek landfill area, as well as to develop massive warehouse facilities.

In the early 1980s, due to the growth of Georgia-Pacific's paper operation and increased concerns about environmental quality in the harbor, a large water treatment lagoon (the Aerated Sedimentation Basin (ASB)) was constructed at the mouth of the waterway. The lagoon, along with a major fill project at Squalicum Waterway during the same era, completed the basic topography and navigational courses that make up Bellingham's harbor today (refer to **Appendix L** for more information on 19<sup>th</sup> and 20<sup>th</sup> Century history of the site and vicinity).

## Methodology

Historic and cultural resource investigations were conducted by Artifacts Consulting, Inc. and Northwest Archaeological Associates, Inc from May 2007 through August 2007 to evaluate the potential for historical and archaeological resources within the New Whatcom site and in the site vicinity. These investigations build upon previous historic and cultural resource studies of the site (previously conducted as part of the Port's due diligence process prior to its acquisition of the Georgia-Pacific properties) and other studies conducted in the site area. The investigation of historic resources (i.e. buildings and structures) included a field survey of structures located on the site. The study also included review of historic documents from the Bellingham Public Library; Whatcom Museum of History and Art; State Archives Northwest Regional Branch; Center for Pacific Northwest Studies; Washington State Historical Society; Whatcom County Assessor's records; the City of Bellingham; Washington State Department of Archaeology and Historic Preservation; Washington State Library; and, the US Army Corps of Engineers.

The cultural resources (i.e. archaeology) assessment relied primarily on previous studies, historic records, photographs, and maps from the Washington State Department of Archaeology and Historic Preservation, the Center for Pacific Northwest Studies, the Whatcom Museum of History and Art, the Whatcom County Historical Society, the University of Washington Library, the Western Washington University Library and the Seattle Public Library. Geotechnical information was also used from studies done in connection with the *Whatcom Waterway Cleanup Supplemental EIS*. Coordination with the Lummi Nation and Nooksack Tribe was also conducted to identify potential issues and availability of existing information.

# Historic Resource and Archaeological Investigation Results

## Historic Resources

Of the 36 existing buildings remaining on the New Whatcom site<sup>1</sup>, the historic property survey identified 20 buildings that are at least 40 years of age or older (the period of 40 years or older is utilized to include buildings close to being 50 years old that could reach the 50-year threshold within the redevelopment period). The existing buildings on the site that are at least 40 years of age include buildings 3, 4, 9B and 10 in Area 1; buildings 7, 14, 15, 37, 49 and 51 in Area 2; buildings 13 and 17 in Area 3; buildings 8, 9 and 12 in Area 4; building 50 in Area 5; and buildings E1, E3, E4 and E5 in Area 10 (refer to Figure 2-4 and Figure 3.11-1 for maps indicating existing buildings on the site and those identified as at least 40 years of age, respectively). Two additional structures on the site (one pier in Area 8 and one bulkhead/wharf along Areas 2, 3 and 4) are at least 40 years of age. Thus, the site contains 20 existing buildings and two pier or wharf structures over 40 years of age (for a total of 22 buildings/structures). None of these buildings or structures is currently listed on the National Register of Historic Places (NRHP), the Washington Heritage Register (WHR), or the Bellingham Local Landmark Registry (BLLR); however, it was concluded that 13 of these 22 buildings/structures are potentially eligible for at least one or all of the above mentioned historical registers. These potentially eligible resources include the bulkhead/wharf defining the Whatcom Waterway which is reflective of historic maritime use, and the primarily brick-clad buildings in Areas 2, 3 and 4 which are reflective of previous mill operations. See **Appendix L** for further details on the potentially eligible buildings and structures (see Figure 3.11-1 for a map of potentially eligible historic resources on the New Whatcom site). The State DAHP would provide the formal opinion as to the potential eligibility and listing status of onsite resources.

In addition to onsite historic resources, 43 listed historic buildings, structures or districts are located within the vicinity of the New Whatcom site (within approximately 2 miles of the site). These historic resources are all listed on the NRHP, WHR and/or the BLLR and a majority of them are located within the Central Business District (CBD) or the Old Town area of the Lettered Streets Neighborhood. For a map and table of existing historic resources in the vicinity of the New Whatcom site please refer to **Appendix L**.

## Archaeological Resources

Over the past 30 years, numerous cultural resource and archaeological investigations have been conducted on the New Whatcom site and in the site vicinity (within two miles of the site). Recent archaeological monitoring of construction at the Holly Street Landfill, 200 feet to the northeast of the site, recovered historic-period artifacts from the north shore of Whatcom Creek. Approximately 600 feet northeast of the site, a cultural resource assessment documented an unpaved portion of the historic Whatcom Trail and a disturbed prehistoric shell deposit. Approximately one mile northwest of the site, two buried isolated Native American lithic artifacts and the remains of a historic plant nursery were identified. No archaeological resources have been recorded on the New Whatcom site; however, shell that may have been from an

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<sup>1</sup> Includes only those buildings assumed to remain on the site subsequent to completion of the Georgia-Pacific Demolition Plan.



Note that building numbers in (#) reference the numbering system used by the Port of Bellingham and on Figure 2-4; numbers outside (#) reference the numbering system used by Artifacts Consulting.

Source: Artifacts

archaeological deposit was recently observed in geotechnical borings conducted on Laurel Street, adjacent to the site (see **Appendix M** for a full list of cultural resource and archaeological investigations conducted on the New Whatcom site and site vicinity).

Although no known archaeologically significant cultural resources are located on the New Whatcom site, the site is located in a potentially archaeologically-sensitive landscape that includes tideflats, beaches and bluff areas. Former tideflats comprise a majority of the New Whatcom site. In particular, tideflat areas at the mouth of Whatcom Creek could harbor significant archaeological materials due to the fact that villages were often located near estuaries because of the availability of abundant resources. These tideflat areas have some potential for archaeological materials; however, such materials would likely be encountered as isolated finds beneath the fill.

The bluffs are the oldest landforms in the area and could contain remnants of camps associated with early hunter-gathers who first colonized the area. Undeveloped portions of the bluffs, adjacent to the eastern edge of Areas 2 and 5 and the southern edge of Area 7, are considered sensitive for artifacts and features such as fire-modified rock concentrations, structural remains, occupation surfaces and shell midden deposits, and contain a high probability of containing such archaeological materials. Bluff area is also located along the southeast edge of Area 10, and though grading may have reduced the height of the bluffs, this area may still retain a high potential for pre-contact archaeological resources along the shoreline below the bluffs. Similar resources, including artifacts, shell midden deposits, occupation surfaces, structural remnants and the remains of canoes may be located near the contact between natural beach deposits and the historic fill along the southeast edge of Area 1 and the Whatcom Waterway; the east edge of Areas 2, 5 and 7; the southwest edge of Area 7; and, the southern edge of Area 9 (see **Figure 3.11-2** for a map of potential archaeological areas on the New Whatcom site).

On an overall basis, the majority of the New Whatcom site is considered to have a moderate potential to contain significant Native American archaeological materials; this includes the majority of the site which is comprised of fill material over the historic tideflat area. The portions of the site that are adjacent to the historic shoreline (i.e. the base of the bluffs) have the highest potential to contain significant Native American archaeological materials.

### 3.11.2 Impacts

This section discusses potential impacts to any existing historic and cultural resources in the site area or potential resources on the site, related to construction and operation of future land uses identified under the EIS Alternatives.

#### Redevelopment Alternatives 1 through 3

Alternative 1 (Higher Density Alternative) assumes the most extensive level of development (roadways, utilities, structures and relocation of the railroad corridor) and, therefore, presents the greatest potential to impact Native American and historic resources. Alternatives 2/2A and 3 assume similar types of redevelopment at lower intensity levels and would result in a slightly lower potential to impact Native American resources; the potential to impact historic resources would be similar to Alternative 1, given the assumptions noted below.



## Construction

### *Onsite Historic Resources*

For the purposes of a worst-case analysis in this Draft EIS, Alternatives 1 through 3 assume that up to 17 of the 22 existing buildings and structures over 40 years of age could be removed as part of the redevelopment process; of the five buildings/structures over 40 years of age to be retained, one is considered a potentially eligible resource. Twelve of the 17 buildings/structures that could be removed have been identified as a potentially eligible resource. Removal of these buildings and structures would represent a direct impact to potentially eligible resources.

However, it is possible that some of these buildings could be retained, resulting in adaptive reuse and rehabilitation of some buildings and structures (the Port intends to explore opportunities for adaptive reuse of such existing buildings with consideration of structural, economic, market and land use factors). Retention of the 12 potentially eligible resources would result in avoidance of the direct impact. Final decisions on the removal or retention of buildings and structures would be made in the future by the Port and City in conjunction with site developers.

Based on the studies conducted for the Draft EIS, the following 12 buildings and structures (11 buildings and the bulkhead/wharf associated with the Whatcom Waterway) are potentially eligible for listing on the National Register of Historic Places (NRHP), Washington Heritage Register (WHR) and/or City of Bellingham Local Landmarks Register (BLLR), and are assumed to be removed or affected as part of the Redevelopment Alternatives (refer to **Figure 3.11-1** for a map of buildings on the site and **Appendix L** for a description of all buildings):

- Redevelopment Area 1 – No potentially eligible buildings are assumed to be removed from Area 1.
- Redevelopment Areas 2, 3 and 4 – All of the existing buildings within Areas 2 through 4 are assumed to be removed, including buildings associated with the Georgia Pacific mill operations. Buildings assumed to be removed that are potentially eligible include; building 7 (Granary), building 13 (Digester Building), building 14 (Pulp Screen Room), building 15 (Beach Plant), building 17 (Alcohol Plant), building 8 (Barking and Chipping Plant), building 9 (Chip Bin Building), building 12A (Boardmill), building 37 (Pulp Warehouse) and building 49 (High Density Storage).

The planned restoration of a natural shoreline along the southern waterfront of the Whatcom Waterway under Alternatives 1 through 3 would modify its character-defining features (such as bulkheads and wharfs) and dismantle sections of its delineating edges. A continuous, natural shoreline would replace the industrial wharf along the southern edge of the Whatcom Waterway in the northern portions of Areas 2 through 4. The assumed reformation of the shoreline on the southern edge of the waterway would require the removal of pilings, wharf structure, and stone and concrete rip rap. The visual perception of the historic configuration of the waterway would be diminished by this activity. The northern bank of the Whatcom Waterway and wharf edge (Area 1) and the structured edge along Area 9 (Bellingham Shipping Terminal) would not be substantially altered, and would continue to reflect the historic character of the Whatcom Waterway.

- Redevelopment Areas 5 through 9 – No potentially eligible buildings are located in these areas.
- Redevelopment Area 10 – All existing buildings in Redevelopment Area 10 are assumed to be removed. The only eligible building in this area that is potentially eligible is building E1 (Douglas Management/Bloedel Donovan).

Building 3 (Ebanol/Bellingham Builders Supply in Redevelopment Area 1) is potentially eligible for listing and is assumed to be retained under the Redevelopment Alternatives.

### *Offsite Historic Resources*

Listed historic resources in the New Whatcom site vicinity could potentially experience indirect impacts from construction activities during redevelopment of the site. These construction-related impacts could include dust from construction equipment and vehicles; vibration from vehicle movement and construction activity; and, increased traffic associated with construction vehicles and construction workers. Construction activity would occur incrementally over the 20-year buildout period and could result in temporary impacts when construction occurs in direct proximity of offsite historic resources. With adherence to construction-related mitigation measures, significant impacts to these resources would not be anticipated (refer to Sections 3.1, **Earth**, 3.2, **Air Quality**, and 3.12, **Transportation**, for identification of mitigation measures to be employed during construction).

### *Archaeological Resources*

Under the preliminary grading concept for other redevelopment, roadways on the site would be raised 3 to 6 feet above existing grades via imported fill material. However, to the extent that building or roadway construction would require below grade excavation, such excavation could adversely affect pre-contact or ethnohistoric Native American archaeological materials potentially located below the bluff portions of Areas 2, 5 and 7 (construction below the bluff would likely be very limited, however). Below-grade construction and utility installation, if any, could also disturb natural sediments along the former beach and shoreline in Areas 1, 2, 5, 7, 9 and 10, resulting in potential impacts to pre-contact or ethnohistoric Native American resources that were created by shoreline-focused cultural activities. In addition, removal of existing waterfront features along the south side of the Whatcom Waterway and the relocation of the BNSF railroad corridor (under Alternatives 1, 2 and 2A) could create the potential to expose or disturb buried Native American and historic archaeological resources in these areas. See **Mitigation Measures** below for a list of measures to mitigate potential impacts to possible buried archaeological resources.

### Operation

#### *Historic Resources*

Assumed redevelopment under Alternatives 1 through 3 would not be expected to directly impact any listed historic properties in the vicinity of the site (i.e. those listed on the NRHP, WHR and/or BLLR). Increased vehicular and pedestrian traffic in the vicinity of these offsite historic properties could result in increased levels of air pollution, noise and vibration; however,

such levels are not anticipated to be significant. Therefore significant impacts to historic resources would not be expected.

New buildings associated with redevelopment on the New Whatcom site could alter existing views from certain offsite historic resources in the surrounding area; however a majority of the views from these historic resources towards the New Whatcom site, and beyond to Bellingham Bay, are currently affected by existing buildings and structures. All of these resources are located in highly-developed areas (most are located in the Central Business District) that feature an urban character and level of activity. The historic value of these resources is not dependent upon views to and beyond the New Whatcom site. Therefore, alteration of existing views, if any, would not be anticipated to reduce the historic value of these resources, and significant impacts resulting to existing views would not be anticipated (refer to Section 3.10, **Aesthetics/Light and Glare**, for detail on view conditions under the Alternatives).

### *Archaeological Resources*

There would be no identified operational impacts to archaeological resources from the Redevelopment Alternatives.

### No Action Alternative

Under the No Action Alternative, it is assumed that approximately one million square feet of new industrial use would be constructed on the site in accordance with the site's existing industrial zoning. In addition, approximately 1.1 million square feet of existing building space would be retained and reused.

## Construction

### *Historic Resources*

The No Action Alternative assumes the retention of all existing buildings (subsequent to completion of the Georgia-Pacific Demolition Plan) on the New Whatcom site, as well as retention of the bulkhead/wharf along the southern edge of the Whatcom Waterway. Therefore, no direct impacts to potential historically-eligible buildings or structures would occur as part of redevelopment under this alternative. During construction activities, listed historic resources in the site vicinity could experience indirect impacts such as dust, vibration and traffic; with implementation of construction-related mitigation measures, significant impacts would not be anticipated.

### *Archaeological Resources*

To the extent that infrastructure improvements and building redevelopment under the No Action Alternative result in excavation into existing soils, archaeological resources could be adversely affected.

## Operation

### *Historic Resources*

Similar to the Redevelopment Alternatives, redevelopment under the No Action Alternative could result in increased levels of noise, air pollution and traffic in the vicinity of offsite historic properties, but these levels are not anticipated to be significant. Redevelopment could also affect views from offsite historic resources; however, a majority of these resources are currently affected by existing buildings and structures. In addition, the historic value of these resources is not dependent on views toward the New Whatcom site and beyond. As a result, no significant impacts are anticipated.

### *Archaeological Resources*

No identified operational impacts to archaeological resources would occur from redevelopment under the No Action Alternative

## Indirect/Cumulative Impacts

Most of the potentially-eligible historic resources on the site are associated with the site's and the City's industrial history. If such resources are fully removed, the historical character of the working waterfront would be diminished over the long term. Adaptive reuse of existing buildings within the mix of commercial, residential, retail and marine-related uses could be a tool to retain the site and area's link to the past.

Separate projects known to be planned or proposed in the area include: improvements to the Bellingham Shipping Terminal; improvements along the south side of the I&J Waterway and north side of the Whatcom Waterway; Bellwether on the Bay Phase II; 1010 Morse Square; the Bayview Towers; and, the over-water trail to Boulevard Park (refer to **Chapter 2 – Section 2.9** for further details on these known projects). Planned and proposed projects within and near the site area could result in impacts to historic and archaeological resources depending on the specific nature of the project and the depths of excavation. Those projects that would occur along or adjacent to the historic shoreline areas would have the greatest potential to encounter archaeological resources during construction. The City's planned over-water trail to Boulevard Park and the high-speed bicycle trail along the bluff would have the highest potential to encounter such resources during construction. No direct impacts to offsite listed historic resources would result from these projects. The Morse Square, Bayview Towers and Bellwether on the Bay projects, as well as other future development in the area, have the potential to cumulatively affect historic structures in the area as a result of construction activity (vibration, dust and traffic) and the potential to alter views. However, such impacts are not expected to be significant.

### 3.11.3 Mitigation Measures

#### Historic Resources

The following measures have been identified to mitigate potential impacts to potentially eligible historic resources within the site and listed resources in the immediate vicinity of the New Whatcom site:

- The Port would explore opportunities for adaptive reuse of existing onsite industrial buildings with consideration of structural, economic, market, and land use factors.
- Historic American Building Survey (HABS) and Historic American Engineering Record (HAER) documentation for potentially eligible buildings and structures onsite that are scheduled for demolition could be prepared during the future permit process.
- An interpretation plan for the Whatcom Waterway area and potentially eligible buildings and structures onsite that are scheduled for demolition or major modifications could be formulated during the future permit process.
- Building materials salvage and reuse strategies could be developed for potentially eligible buildings and structures onsite that are scheduled for removal and demolition. Salvaged materials could include heavy timbers, brick, steel, and stone from onsite buildings.
- The terra cotta clad high pressure tanks, located on the site and associated with the former mill operation could be retained (either onsite or at another location). In addition, the high pressure globe and steel log remover could also be retained as a representation of the historically industrial use of the site.
- Any planned onsite construction in the immediate vicinity of NRHP, WHR and BLLR listed buildings and structures could be monitored so that such listed resources would not be adversely affected by ground settlement, vibration or other geotechnical factors.

## Archaeological Resources

Potential mitigation measures that could be considered during the construction permit process include:

- A management plan could be developed by the Port for the construction life of the New Whatcom redevelopment, drafted in consultation with and agreed upon by applicable state, tribal and local agencies. The management plan could:
  - Establish procedures and appropriate responses for addressing potential effects to archaeological resources, including review by a qualified archaeologist of specific construction components (review could be limited to construction components located in or adjacent to high probability areas identified in **Figure 3.11-2**);
  - Consider levels of contractor awareness training and specific areas where onsite archaeological monitoring during construction could be conducted;
  - List onsite chains of authorities and contacts for decision-making regarding inadvertent archaeological discoveries during construction activities;
  - Describe prescriptive actions that would result in minimal additional disturbances to potentially significant resources if any are discovered, including specific treatment plans for inadvertent discovery of human remains; and,

- Identify expectations of participating groups involved in addressing the site's potential for discovery of archaeological resources.

#### 3.11.4 Significant Unavoidable Adverse Impacts

The reformation of the Whatcom Waterway's man-made shoreline to a natural shoreline (south side of the waterway) would be likely to diminish the perceptible characteristics of the navigational marine structure and would replace the historical industrial features of the waterway. The cluster of masonry buildings that started as the Puget Sound Pulp and Timber Mill and became the Georgia-Pacific Pulp and Tissue Mill could potentially be fully replaced by redevelopment; up to 11 buildings, potentially eligible for listing on the National Register of Historic Places, Washington Heritage Register and/or the City of Bellingham Local Landmarks Register, could be removed. However, actual decisions regarding demolition or adaptive reuse of such buildings would be determined in the future by the Port, the City and site developers. With implementation of mitigation measures, no significant unavoidable adverse impacts to historic resources would be expected.

Implementation of the identified mitigation measures would address any potential for significant impacts to archaeological resources; therefore, no significant unavoidable adverse impacts to archaeological resources would be anticipated.