

To: Amy Keenan
Senior Planner
Whatcom County Planning & Development Services
5280 Northwest Drive
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Transmitted Via Email to: akeenan@whatcomcounty.us

February 27, 2019

RE: Governor's Point Notice of Application, LSS2018-00003, SHR2018-00018, SEP2018-00124 and PLN2018-00016

Dear Ms. Keenan,

Thank you for taking the time to consider our comment on the Notice of Application for the Governor's Point Long Subdivision, file numbers LSS2018-00003, SHR2018-00018, SEP2018-00124 and PLN2018-00016. We respectfully request to be added to any correspondence and updates as this project moves through the permitting and environmental review process.

RE Sources for Sustainable Communities is a local organization in northwest Washington, founded in 1982. RE Sources works to build sustainable communities and protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy, and action. Our North Sound Baykeeper program is dedicated to protecting and enhancing the marine and nearshore habitats of northern Puget Sound and the Georgia Strait. Our chief focus is on preventing pollution from entering the North Sound and Strait, while helping our local citizenry better understand the complex connections between prosperity, society, environmental health, and individual wellbeing. Our North Sound Baykeeper is the 43rd member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has over 20,000 members in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

We want to recognize the intent of the project proponent for pursuing a development proposal that maintains 94 acres of open space as a Nature Reserve and scales the development potential down to 16 single-family residential homes. However, we have concerns regarding the high likelihood of water quality impacts from the use of septic and stormwater runoff from the homes and impacts to terrestrial and aquatic habitat within the Chuckanut Wildlife Corridor. Our concerns are below.

- **Septic:** The Chuckanut Pollution Identification and Control (PIC) program has identified septic systems as the primary cause of fecal coliform pollution. How will this program prevent further

degradation and fecal coliform loading into Chuckanut Bay? We propose requiring the development to connect to the City of Bellingham sewer line as a condition for approval.

- **Chuckanut Wildlife Corridor:** How will the project proponent mitigate impacts resulting from development to the Chuckanut Wildlife Corridor (WCC 16.16 Appendix E) as set forth in WCC 16.16.700-760?
- **Overwater structures:**
 - What mitigation or alternatives are available for the proposed float, gangway and pier on Pleasant Bay?
 - How will this overwater structure impact forage fish, juvenile salmon, and other aquatic life? Pocket beaches and the nearshore environment is critical habitat for these dwindling aquatic species that are linked to our endangered Southern Resident Orcas.
 - Will overwater structures be proposed for the residential developments on Chuckanut Bay?
- **Stormwater:** We are concerned about the stormwater impacts that will result from increased impervious surfaces from the homes. We are less concerned about the stormwater impacts from roads as they will drain into forests; however, it is inevitable that roof runoff from homes will wash into Chuckanut Bay given their likely orientations resulting from the topography of the area. Each property should require Low Impact Development (LID) Best Management Practices (BMPs) as a condition for approval. This includes minimized impervious surface foot prints, tree retention, and rainwater catchment in addition to the proposed filter strips.
- **SEPA environmental checklist error:** On p. 10 for question 5c the answer incorrectly states that the site is not part of a migration route. This site is in the Pacific Flyway as denoted in many SEPA checklists. We ask for this correction to be made.

Governor's Point is the last large piece of intact undeveloped property along the shoreline within the Chuckanut Wildlife Corridor. We urge you and your colleagues to consider the unavoidable and adverse impacts to our water, shorelines, and habitat if there are no mitigation measures available that will prevent no-net-loss to our water, habitat, and natural resource lands.

We thank you for your attention to this matter.

Sincerely,

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