

To: Diane Hennessey
Department of Ecology-SEA Program
Federal Project Coordinator
P.O. Box 47600
Olympia, WA 98504

Transmitted via email: ecyrefedpermits@ecy.wa.gov

13 June 2019

RE: Mercey, LLC - Pacific Place

Dear Diane Hennessey,

Thank you for taking the time to consider our comments on the permit application submitted by Mercy, LLC to fill 1.28 acres of category 3 wetlands and to impact an additional 0.83 category 2 wetlands in the Silver Creek Watershed.

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 appreciate the efforts made to mitigate for the loss of wetlands that will be permanently destroyed and impacted by this project. The mitigation plans state that 0.5 acres of wetland will be created, 1.25 acres will be enhanced, and another 14.7 acres will be protected from development. However, we feel these measures do not result in a no-net-loss of wetlands in the Silver Creek Watershed as required in the Bellingham Municipal Code (BMC) 16.55.190. This plan would result in a net loss of a minimum 0.78 acres of wetlands (1.28 filled - 0.5 created = 0.78 loss) but in reality the loss would be far greater. Just west of the planned development lies a category 2 wetland and a Native Growth Protection Area. With a reduced buffer planned on site, development currently occurring north of the property, and development



likely to occur west of the property we will be left with an unprotected, isolated wetland surrounded by impervious surfaces. These sensitive areas will be cut off from their historic hydrologic connectivity and their functions will be severely diminished.

Currently, the site is covered in native plants and trees such as cottonwood, aspen, western red cedar, salmonberry, snowberry, thimbleberry, indian plum, sword fern, and Oregon grape and is home to many native birds, amphibians, and small mammals who find refuge in these native woodlands. When we visited this site we were struck by the beauty and the cacophony of native birds calling to each other.

When this area is covered with over an acre of impervious surfaces these habitat components will be destroyed and the nearby sensitive areas will be compromised. There is an overwhelming amount of research¹ that illustrates the importance of wetlands. In addition to crucial habitat they filter our rainwater and act as sponges and reservoirs for water when rain is plentiful and for when it is scarce. With our changing weather patterns leading to more times of intense rainfall and longer, drier periods we need fully functioning wetlands more than ever. Despite their critical ecological functions, wetlands are still being lost in Whatcom County, Washington state, and across the United States² to make room for more and more development.

We are requesting that the U.S. Army Corps of Engineers and the Department of Ecology use their authority to prevent a net loss of wetland from occurring in Whatcom County and to deny this permit. We recognize that growth is happening at a very fast rate in Whatcom county but we do not feel that this gives a green light to destroy irreplaceable ecosystem services. If we are to grow, we need to grow thoughtfully and sustainably.

If this project is permitted we request that some changes be made to the plan. First and foremost we would like to see a decrease in the amount of impervious surfaces. This can be done by decreasing the square footage of the buildings, incorporating vegetation within the vast number of parking spaces, installing rain gardens, building green roofs, minimizing rooftops, and by using permeable pavement.

We would also encourage the builders to incorporate other low impact development (LID) techniques such as installing solar panels on site, efficient heating and cooling systems in the building, and smart light technology among others. This will help offset some of the carbon footprint accrued from clearing native forest and paving wetland.

In sum, we feel that the mitigation for this project does not result in an "equivalent or greater function" that is required in the Bellingham Municipal Code and that it is adding to cumulative, adverse environmental impacts to water quality, wetland function, and habitat. We are requesting that you use your authority to prevent more wetlands from being permanently destroyed in Whatcom County.

Thank-you. We appreciate your time and consideration.

Sincerely,

Kirsten McDade
Pollution Prevention Specialist

Ander Russell
Clean Water Program Manager

CCed:

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Resources

¹U.S. EPA. Connectivity of Streams and Wetlands to Downstream Waters: A Review and Synthesis of the Scientific Evidence (Final Report). U.S. Environmental Protection Agency, Washington, DC, EPA/600/R-14/475F, 2015.

²National Wetlands Inventory. Retrieved from: <https://www.fws.gov/wetlands/index.html>