

To: Steve Sundin, Senior Planner  
Kathy Bell, Senior Planner  
Planning and Community Development Dept.  
City Hall, 210 Lottie St.  
Bellingham, WA 98225

Transmitted Via Email to: [woodsvc@cob.org](mailto:woodsvc@cob.org)]

22 April 2024

**RE: Notice of Application for The Woods at Viewcrest**

Dear Mr Sundin and Ms. Bell,

Thank you for taking the time to consider our comments on the proposal to develop the 38-acres on the Mud Bay Cliffs overlooking Chuckanut Bay. Due to the unique and sensitive habitat along with the steep terrain and problematic soils, ***we request that the City of Bellingham issue a SEPA threshold Determination for Significance and require a full Environmental Impact Statement.*** This will allow a full analysis of the environmental impacts and ensure that any development that occurs here does not have negative impacts.

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We mobilize people in Northwest Washington to build just and thriving communities and to protect the land, water and climate on which we all depend. Our priority programs include Protecting the Salish Sea, Freshwater Restoration, Climate Action, and Fighting Pollution—all critical issues affecting our region. Our North Sound Waterkeeper is also a member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has thousands of supporters in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

Upon reviewing the planning documents, we are concerned that the proposed project may lead to adverse environmental impacts to on-site wetlands, forested land, and the Mud Bay estuary. Due to the steep terrain of the site, there may be a considerable amount of erosion and sediment created during initial land disturbance as well as during and after construction. The plan as written does not adequately address how this sediment will be contained particularly as rain events get more intense. Sediment clogs the gills of aquatic organisms, clogs the interstitial spaces in substrate that is critical habitat and oxygen reserves for aquatic species, and are conduits for toxic pollutants.

The current plan also does not adequately treat the increase in contaminated stormwater coming from the newly created hard surfaces such as streets, roofs, and lawns that will contribute fossil fuels, tire wear particles (6PPD-Q), metals, nutrients, pesticides, and fecal bacteria. Mud bay estuary, the receiving water body of this stormwater, is a Category I estuarine wetland that is critical habitat for a myriad of aquatic organisms including the keystone species salmon. These unique, and now rare wetlands, need to be protected at all costs because of the enormous ecological functions that they perform. One of the main threats to salmon and orca whales are toxic contaminants from stormwater runoff. This development may exacerbate the amount of contaminants entering the Salish Sea.

Additionally, building several dozen homes on these steep slopes may elevate the risk of landslides and rockfall hazards. Preliminary geologic review has indicated numerous areas that should be avoided entirely, and other areas that will require setbacks to mitigate geologic risks. These risks should be fully evaluated.

This development project as planned will likely contribute to the continual degradation of the Salish Sea through the loss of tree cover and increase of impervious surfaces compounded by the steep terrain and hard soils. All aspects and levels of the marine ecosystem are suffering because of the continual alterations that we make to our landscape, especially those in sensitive places like this one. ***For this reason we request that a complete Environmental Impact Statement be performed to adequately evaluate all the potential impacts to this area.***

Sincerely,

Kirsten McDade  
RE Sources  
North Sound Waterkeeper