

Chapter 4. Clarifications or Corrections to Draft EIS Information

This chapter includes Draft Environmental Impact Statement (EIS) clarifications or corrections based on responses to comments presented in Chapter 5 of this Final EIS or based on Whatcom County (County) or consultant review of the Draft EIS information. The clarifications or corrections are organized in the same order as the Draft EIS sections and by page numbers. The sources of the clarifications or corrections are noted where they respond to comments in Chapter 5. The clarifications or corrections do not change the relative impacts of the EIS alternatives or the overall EIS conclusions.

4.1. Draft EIS Chapter 1 Summary

Where appropriate, changes made to other chapters or subsections identified below are shown in track changes in Chapter 1, *Summary*, Table 1-1 *Summary Matrix of Impacts and Mitigation Measures*.

4.2. Draft EIS Chapter 2 Alternatives

No changes.

4.3. Draft EIS Chapter 3 Suitability Analysis

4.3.1. Bellingham

The Bellingham Suitability Analysis is clarified regarding service areas, comments, second paragraph (page 3-5 of the Draft EIS) as follows:

The City of Bellingham has adequate water rights and water plant capacity to provide water service to its retail service area under all future growth scenarios listed. The City's 2009 Water System Plan has a horizon year 2028 population greater than any of the alternatives being considered. The city's Water System Plan identifies future service lines extending into the city's UGA.

The Bellingham Suitability Analysis is clarified regarding service areas, options, second bullet (page 3-5 of the Draft EIS) as follows:

The city's Sewer Plan horizon year of 2026 and Water Plan horizon year of 2028 may require adjustment in the future, but the population planned in city functional plans generally exceeds that of the alternatives under review. No significant impacts are anticipated given city plans.

4.3.2. Birch Bay

The Birch Bay Suitability Analysis is updated regarding service areas, comments (page 3-9 of the Draft EIS), as follows:

Majority of UGA is in the Short-Term Planning Area, with some areas to the east in the Long-Term Planning Area.

The district's 2009 Comprehensive Water Plan indicates that water supply is only sufficient through 2011~~2008~~. The Birch Bay Water and Sewer District's 2009~~97~~ Comprehensive Water Plan includes several new supply and distribution projects expected to address supply deficiencies. The district plan's 203~~52~~ population projection of 12,913~~13,237~~ is greater than the population projections considered for the district's water service area under all 2031 EIS alternatives. Birch Bay's Comprehensive Water Plan indicates that it will extend future service areas to areas within the district boundaries and provides future connection policies. However, it does not provide a map identifying future major service lines.

The district's 2009~~4999~~ Sewer Plan had higher~~lower~~ population estimates for the district's 2029 horizon year than anticipated in any of the alternatives being considered to 2031. The 2009 Sewer Plan indicates that the district will exceed existing capacity by 2019. However, with the wastewater treatment plant upgrade projects noted in the 2009 Comprehensive Sewer

~~Plan, the district will be able to accommodate the growth anticipated to 2029. However, the district's sewage treatment plant, with a capacity to treat over 1 mgd is able to accommodate the additional population growth anticipated in all of the alternatives.~~ The district's plan indicates where current sewer service exists and establishes a future service area that consists of areas of portions of the Birch Bay, Blaine, and Cherry Point UGAs. The plan does not appear to identify future service lines.

More analysis of public services and facilities is provided in Section 4.10.

The Birch Bay Suitability Analysis is clarified regarding service areas, options, third bullet (page 3-9 of the Draft EIS) as follows:

The district's Sewer Plan horizon year of ~~2029~~2020 may require adjustment in the future, but the plan's capacity appears sufficient for all alternatives.

4.3.3. Blaine

The Blaine Suitability Analysis is updated regarding service areas, comments (page 3-13 of the Draft EIS), as follows:

Western and eastern UGAs in Short-Term Planning Area with south-central area in Long-Term Planning Area. Outside of UGA in the study area, most land is included in a water district.

The City of Blaine's Comprehensive Water System Plan provides a city population projection of 11,587 by 2027, larger than anticipated for the city water service area under any of the 2031 planning alternatives. The plan notes that the city has adequate supply to meet projected demand. The plan shows a series of capital improvements needed to maintain capacity and provide adequate distribution. The plan does not appear to show water service extensions to areas within the UGA but service policies indicate that the city is planning to serve those areas.

The 2004 City of Blaine General Sewer Plan and its 2005 update shows major existing sewer service lines and some future sewer trunk lines. The City of Blaine Comprehensive Plan shows future sewer service area as portions of the Blaine and Birch Bay UGAs not served by Birch Bay Water and Sewer District though existing or future sewer service lines are not depicted. The city is at capacity under the No Action Current Comprehensive Plan Alternative, and has a deficit under remaining alternatives. The largest deficit occurs under Action Alternative Y. However, the City of Blaine 2005 General Sewer Plan and 2006 Comprehensive Plan both indicate that the city has plans to upgrade and expand sewage treatment plant capacity to meet future demands for service, Washington State Department of Ecology (Ecology) National Pollutant

~~Discharge Elimination System (NPDES) requirements, and to replace aging infrastructure. The city plans to complete construction on its new wastewater treatment plant and begin operation in 2010 (City of Blaine 2009). However, the city has plans to upgrade and expand sewage treatment plant capacity to meet future demands for service and to replace aging infrastructure.~~ The new wastewater treatment plant's design capacity of 1.5 mgd would accommodate projected wastewater flows to the end of the 2031 planning period.

More analysis of public services and facilities is provided in Section 4.10.

The Blaine Suitability Analysis is updated regarding service areas, options, second bullet (page 3-13 of the Draft EIS) as follows:

The city's Water Plan and Sewer Plan horizon years of 2027 and ~~2025~~2025+5 respectively may require adjustment in the future; however, water supply and wastewater treatment with the scheduled capital plan improvements appears sufficient for all alternatives.

4.3.4. Everson

The Everson Suitability Analysis is clarified regarding service areas, options, third bullet (page 3-9 of the Draft EIS) as follows:

When the sewer plan is developed, the horizon year should match the growth allocation horizon year.

4.4. Draft EIS Chapter 4 Affected Environment, Significant Impacts, and Mitigation Measures

4.4.1. Section 4.1 Earth

No changes.

4.4.2. Section 4.2 Air Quality

No changes.

4.4.3. Section 4.3 Water Resources

Amend Table 4.3-1 (page 4.3-5 of the Draft EIS) as follows (Response to Ecology-2):

Table 4.3-1. Mapped Streams within or adjacent to Cities/UGAs in Whatcom County

City/Urban Growth Area (UGA)	Streams
Bellingham	Squalicum Creek
	Whatcom Creek
	Padden-Padden Creek
	Chuckanut Creek
Ferndale	Nooksack River
	Terrell Creek
	Fourmile Creek
	Deer Creek
	Tenmile Creek
Birch Bay	Terrell Creek
Blaine	Dakota Creek
	California Creek
Lynden	Fishtrap Creek
	Nooksack River
	Pepin Creek/Double Ditch
Everson/Nooksack	Nooksack River
	Sumas River
	Johnson Creek
Sumas	Sumas River
	Johnson Creek
Columbia Valley	Kendall Creek

Source: USGS Topographic Quadrangle Maps

Page 4.3-5 of the Draft EIS, bottom of page, paragraph regarding drinking water supply, is modified as follows (Response to Ecology-3):

As mentioned previously, the majority of the County’s drinking water supply capacity is provided by surface water from Lake Whatcom or the Nooksack River ~~and serves a majority of the County’s population, providing approximately 65,000 people (39% of County) with drinking water~~ (Parametrix 2005; Ecology pers. comm.), thus Lake Whatcom, and the Nooksack River are significant water resources in the County, ~~thus~~

and the quality and quantity of the water of both systems is important to maintain. The water quality of both water bodies is discussed below under 303(d) Listings.

Page 4.3-6 of the Draft EIS, second bullet is modified as follows (Response to Ecology-4):

- **Drayton Harbor.** Drayton Harbor is a shallow bay that nearly empties at low tide. Its exposure to offshore marine habitat is limited by Semiahmoo Spit and the pier and marina owned by the Port of Bellingham. Dakota Creek and California Creek estuaries shoreline type is about one-third each of estuarine wetland and mud flat, with 10% man-made shoreline. Drayton Harbor estuarine habitat includes the Dakota Creek and California Creek estuaries (Whatcom County et al. 2005).

Page 4.3-17 of the Draft EIS, first paragraph is modified as follows (Response to Futurewise-12).

If all lands identified as vacant and partially developed within existing UGAs were all fully developed, the amount of impervious surface area in the UGAs would increase by approximately 8,550 acres. If vacant lots in rural residential areas were to develop, the amount of impervious surface in rural areas would increase by about 4,218 acres¹. This represents a worst-case analysis since each alternative does not require the same number of developable acres. Based on the lands available for development, several watersheds within the coverage area that are currently less than 10% impervious surface area (by area) could potentially exceed 10% under full buildout in five discrete watersheds, including: Birch Bay; Campbell River; Lummi Bay; Point Roberts; Silver-Nooksack. In general, when impervious surface area exceeds 10% of the subbasin area the potential for impacts from flooding, reduced groundwater recharge and contamination from urban run-off is increased. However, this is a general rule of thumb. The effects of impervious surfaces typically manifest themselves before the 10% threshold is reached; impacts become more acute and difficult to mitigate when the 10% threshold is exceeded. To maintain the health of water bodies, total impervious surface areas should not exceed 10% in Puget Sound lowland streams. The amount of impervious surface area and the potential impact that impervious surface area could have to both

¹ The analysis is based on urban and rural lands reviewed by County staff as part of the land capacity analysis and excludes resource lands of long-term significance. The alternative-specific impervious surface analysis addresses impervious surface based on demand for land inside the UGA and in rural areas which may include resource lands. Both the analysis in Table 4.3-3 and 4.3-4 are considered order of magnitude to allow comparison appropriate to this non-project analysis.

groundwater and surface water resources should be considered in association with a multitude of other factors, such as the extent of forest cover within the subbasin, connectivity and condition of riparian habitat, stormwater facilities (i.e., treatment and detention) and channel modifications (i.e., channelization, bank armoring, and diking). The potential impact that could occur from increased impervious surface area would be dependent on the condition of these other factors.

Page 4.3-24 of the Draft EIS, last sentence in second paragraph from bottom of page is deleted (Response to Ecology-5).

Potential impacts associated with all alternatives include increasing sedimentation from tributaries and adjacent land. Sediment reduces the storage volume of lakes and other wetlands, which limits opportunities for flood moderation, groundwater exchange, and sediment stabilization. Lake chemistry can be modified because of dissolved nutrients, and nutrients and other contaminants associated with stormwater-borne sediments. Many of these nutrients are a direct result of land management activities, such as increased hard surfaces and lawns, failing septic systems and excessive lawn fertilization. Excessive nutrients can accelerate the natural process of eutrophication, fostering algal blooms and encouraging other nuisance vegetation, while, at the same time, reducing or eliminating the dissolved oxygen supply upon which native plants and aquatic life depend. ~~It is possible that a reduction in fecal contamination of lakes and streams in urbanizing areas may be an indirect result under any alternative, if areas with failing septic systems are repaired and brought into compliance or are serviced by conventional sewage treatment facilities instead and pet waste is managed properly.~~

Page 4.3-30 of the Draft EIS, last sentence of first paragraph under wetlands is deleted as follows (Response to Ecology-6):

Similar to the No Action Current Comprehensive Plan Alternative, the No Action Trends Alternative could likewise impact wetlands through increased rate and quantity of surface runoff into wetlands. ~~Additionally, changes in land use, from agricultural to residential could impact areas that have hydric soils and would be considered wetlands if those lands weren't drained to accommodate agriculture, thus causing a loss of potential wetlands.~~

Page 4.3-32 of the Draft EIS, modify the word distributary, as follows (Response to Ecology-7):

Streams

Impacts on streams under Action Alternative X would be similar to those described above for the No Action Current Comprehensive Plan Alternative, although population growth would be greater, with Bellingham continuing to be the primary employment and population center. Development would be shifted away from rural areas to Bellingham and small urban areas. This alternative would have a greater potential to impact the independent coastal ~~dis~~tributaries located within Bellingham (Squalicum, Whatcom, Padden, and Chuckanut Creeks) from an increase in impervious surface area and density associated with infilling within the existing UGA boundary.

Page 4.3-38 of the Draft EIS, first bullet, clarify the status of the County's stormwater manual (Response to Ecology-8)

- Federal National Pollutant Discharge Elimination System (NPDES) regulations as well as County stormwater regulations require stormwater quantity and quality controls. The County has not yet adopted the Washington Department of Ecology Stormwater Manual for Western Washington. The County may soon adopt the manual or an equivalent, as it is a requirement of NPDES Phase II.~~The County has adopted the Washington Department of Ecology Stormwater Manual for western Washington.~~

Page 4.3-41 of the Draft EIS, last paragraph is amended to clarify the timing of reasonable and prudent alternatives (RPAs) (Response to Futurewise-13).

The County is one of the communities identified in the Biological Opinion, as are Blaine, Everson, Ferndale, Lummi Nation, Lynden, Nooksack and Sumas. However, the timing of implementation of RPAs outlined in the Biological Opinion is uncertain at this time, based on on-going legal action.

Add a mitigation measure to page 4.3-42 of the Draft EIS after bullet five, as follows (Response to Futurewise-14):

- Reduce impervious surface area by adopting new low-impact development requirements that set maximum limits on the percentage of impervious area allowed and increase the infiltration of surface water.
- Reduce the potential for additional impervious surfaces by increasing urban densities and promoting infill development in urban areas.

4.4.4. Section 4.4 Plants and Animals

No changes.

4.4.5. Section 4.5 Land and Shoreline Use

Modify page 4.5-2 of the Draft EIS, second paragraph under “Rural Residential” section to read as follows (Response to Futurewise-16):

While residential uses form the third largest land use category in the unincorporated county, housing densities remain low, ~~rarely-although densities sometimes are high for a rural area,~~ rising above 1 to 2 houses per acre.

Page 4.5-4 of the Draft EIS, Rural section is modified as follows (Response to Futurewise-17):

Rural

Lands designated as Rural are intended to allow county residents to enjoy a rural style of living, characterized by low density development, ~~limited-urban-style~~ rural governmental services, and greater self-determination of property use. Approximately 23.4% of land within the County Planning Area boundary falls into this category.

The first sentence under the Shoreline heading on page 4.5-11 of the Draft EIS is clarified to read as follows (Response to Tull-10):

Under the No Action Current Comprehensive Plan Alternative, shoreline impacts are anticipated to be similar to those associated with the current development pattern; development is assumed to continue on developable shoreline properties consistent with No Action Current Comprehensive Plan growth allocations ~~at the previously forecast rate,~~ with a focus on urban areas.

4.4.6. Section 4.6 Plans and Policies

No changes.

4.4.7. Section 4.7 Population and Employment

Page 4.7-3 of the Draft EIS, second paragraph below Figure 4.7-3, correct spelling as follows:

Hispanic females in the child-bearing years have higher birth rates than whites (Burdge pers. comm.).

Page 4.7-4 of the Draft EIS, source under Table 4.7-1, correct spelling as follows:

Source: Burdge pers. comm. March 31, 2009

Page 4.7-18 of the Draft EIS, Recent Trends, third, fourth, and fifth bullets, correct spelling as follows:

- relatively high vacant and seasonal housing rate; (see Housing Occupancy information in Table. 4.7-5 also Burdge pers. comm.);
- a reduction in school enrollment as the Baby Boomer echo effect produces a lower birth rate (Burdge pers. comm.);
- Western Washington University enrollment at a maximum of 13,000 (current enrollment) instead of 15,000 (Burdge pers. comm.); and

Page 4.7-22 of the Draft EIS, Table 4.7-19, correct column heading as follows:

Table 4.7-19. No Action Current Comprehensive Plan–Jobs/Population Balance by UGA and Rural Study Area

Study Area	Jobs/ <u>Housing</u> <u>Population</u> Ratio:	Additional Growth Ratio	Total Allocation Ratio
UGA and Rural Area	2008 ¹		

Page 4.7-30 of the Draft EIS, continuation of Table 4.7-25, Tools to reduce impacts on agricultural and rural lands but not reduce overall density, (Response to Futurewise-20), amend the list of disadvantages as follows:

<p>Tools to reduce impacts on agricultural and rural lands but not reduce overall density</p> <p>Tools to reduce impacts to agricultural and rural lands include clustering, lot reconfiguration, and other development regulations. Clustering places allowed development on a limited portion of the land and reserves a large remainder for agricultural or other conservation uses.</p> <p>Lot reconfiguration is an option that would allow for clustering of development potential from one or more lots into a specified area of less agricultural value on another parcel or parcels.</p> <p>Development regulations could specify things such as maximum setbacks, maximum footprints, land and water conservation requirements, and other options that would lessen impacts on resource lands.</p>	<p>These options may reduce impact at a site, but are not designed to remove development potential from resource (Ag) and rural lands.</p> <p>The County currently requires clustering in the Agricultural Protection Overlay zone, but this tool needs much improvement.</p> <p>Other development regulations could be effective in some degree in protecting resource lands from conversion or conflict with residential uses.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> ▪ Builds on current regulatory strategies. ▪ Does not include rezoning of land. ▪ Leaves landowners with development potential and value. <p>Disadvantages:</p> <ul style="list-style-type: none"> ▪ Does not decrease development potential in rural and Ag zones. ▪ Clustering and lot reconfiguration strategies would need development and implementation support. ▪ Feasibility of some of these strategies is unknown. ▪ <u>Clustering alone does not effectively protect agricultural land.</u>
---	--	---

Page 4.7-34 of the Draft EIS, Table 4.7-28, correct column heading as follows:

Table 4.7-28. Action Alternative X–Jobs/Population Balance by Urban Growth Area and Rural Study Area

Study Area	Jobs/ Housing <u>Population</u> Ratio:	Additional	Total Allocation
UGA and Rural Area	2008 ¹ (%)	Growth Ratio (%)	Ratio (%)

Page 4.7-35 of the Draft EIS, Table 4.7-29, correct table title as follows:

Table 4.7-29. Action Alternative ~~XY~~–Residential Land Capacity Review

Study Area: UGA	2008 Population	Population Growth Forecast	Growth Share ¹ (%)	Residential Land Needed (Acres)	Surplus or (Deficit) Capacity (Acres)
-----------------	--------------------	----------------------------------	----------------------------------	--	--

Page 4.7-38 of the Draft EIS, Table 4.7-32, correct column heading as follows:

Table 4.7-32. Action Alternative Y–Jobs/Population Balance by Urban Growth Area and Rural Study Area

Study Area	Jobs/ Housing <u>Population</u> Ratio:	Additional	Total Allocation
UGA and Rural Area	2008 ¹	Growth Ratio	Ratio

4.4.8. Section 4.8 Cultural Resources

Text regarding the city’s Historic Preservation Ordinance is added to Draft EIS Section 4.8.1, page 4.8-6, under the heading Preservation Framework and Existing Programs, Local Level, as follows (Response to Bellingham-20):

Local Level

The County does not currently have a local historical society dedicated to recording significant structures in County history; however, the current comprehensive plan does call for the establishment of a historic preservation ordinance (Chapter 10 Design, Policy 10E-5).

The City of Bellingham has a local historic preservation ordinance (Bellingham Municipal Code Chapter 17.90), which includes incentives to preserve historic buildings such as eligibility for special tax valuation. Buildings on the city’s register are listed in Table 4.8-2b.

Page 4.8-1 of the Draft EIS, add a new table as 4.8-2b identifying City of Bellingham Historic Register properties (Response to Bellingham-15):

Table 4.8-2b. City of Bellingham Local Historic Register Buildings

<u>Name</u>	<u>Location</u>
<u>B&B Furniture Building (VECO)</u>	<u>1313 Bay</u>
<u>Barlow Building (Film is Truth)</u>	<u>211 W Holly</u>
<u>BPOE (Elks) Building</u>	<u>1414 Cornwall</u>
<u>County Courthouse (Old)/T.G. Richardson Bldg</u>	<u>1308 E Street</u>
<u>Daylight Building</u>	<u>1201-13 N State Street</u>
<u>Fairhaven Fire Station #2 (Fairhaven P.A.C.)</u>	<u>1314 Harris</u>
<u>First Church of Christ Scientists (The Majestic)</u>	<u>1027 N Forest</u>
<u>Immanuel School of Industries (Akers Taxidermy)</u>	<u>1303 Astor Street</u>
<u>C.X. Larrabee House (Lairmont Manor)</u>	<u>405 Fieldstone Road</u>
<u>Leopold Hotel</u>	<u>1224 Cornwall Avenue</u>
<u>Montague & McHugh Building (Crown Plaza)</u>	<u>114 W Magnolia</u>
<u>Morse Hardware Company</u>	<u>1023-25 N State Street</u>
<u>Mount Baker Theater</u>	<u>106 North Commercial</u>
<u>Roeder Home</u>	<u>2600 Sunset Drive</u>
<u>Roth Block</u>	<u>1106 W Holly, Holly & "G"</u>
<u>Sanitary Meat Market</u>	<u>1015-19 N State Street</u>
<u>Sweet and Company</u>	<u>1021 N State Street</u>
<u>Waldron Building</u>	<u>1312 12th</u>
<u>Washington Grocery Building</u>	<u>1133-35 Railroad Avenue</u>
<u>Whatcom Museum</u>	<u>121 Prospect Street</u>
<u>Wolter/Tweit Home (Ennen Brothers)</u>	<u>1305 Old Fairhaven Pkwy</u>
<u>Young Women's Christian Association</u>	<u>1026 North Forest</u>

Add two new mitigation measures to “Other Potential Mitigation Measures” on page 4.8-29 of the Draft EIS as follows (Response to Bellingham-22):

The County could consider adopting the existing building section of the International Building Code. This section allows historic buildings to be reviewed with more flexibility, increasing the odds of their preservation.

The County could establish an educational program to promote the preservation of historic buildings and archaeological sites.

4.4.9. Section 4.9 Transportation

Amend page 4.9-14 of the Draft EIS under heading Existing Roadway Level of Service to clarify that there are three bullets not two as follows:

The Transpo map shows three locations “approaching current LOS V/C standards” based on current LOS standards and all would be subject to the new lower threshold V/C ratio of 0.90 for Rural Primary Routes:

- Hannegan Road between Van Wyck Road and Smith Road E (just north of Bellingham city limits)
- Birch Bay-Lynden Road: between SR 548 (Blaine Road) and Kickerville Road
- Birch Bay-Lynden Road: near Portal Way and I-5

Amend the title of Table 4.9-5 on page 4.9-28 of the Draft EIS as follows:

Table 4.9-5. County Roadways with Projected Deficient Segment Deficiencies by 2031

4.4.10. Section 4.10 Public Services and Utilities

Due to updated information from service providers several sections of Draft EIS Section 4.10 has been updated. Public Services and Utilities conclusions are similar or, in some instances, are lower impact than found in the DEIS analysis.

Amend Table 4.10-1, *Sheriff’s Office Facilities* found on pages 4.10-2 through 4.10-3 of the Draft EIS (Section 4.10.1, *Police Services*) as follows based on input provided by Sheriff’s Office staff.

Table 4.10-1 Sheriff’s Office Facilities

Facility Name	Location	Office <u>Space</u> Size (Sq. Ft.)	Other (Sq. Ft.)	Total Size (Sq. Ft.)
Public Safety Building - Sheriff’s Facility	311 <u>Grand Ave</u> <u>Prospect Street</u>	15,102	58,183	73,285
Minimum Security Correction Facility	2030 Division Street	6,000	18,000	24,000
Inspector’s Office, Civic Center Building	322 N. Commercial	500	0	500
Cascade Satellite Office (leased space in business park northwest of Smith Rd/Guide Intersection	5373 Guide Meridian	730	0	730
Kendall Satellite Office (space utilized at no charge in the Fire District 14 fire		121	0	121

Facility Name	Location	Office Space Size (Sq. Ft.)	Other (Sq. Ft.)	Total Size (Sq. Ft.)
station)				
Birch Bay Fire Hall		192	0	192
Nugent's Corner Fire Hall		88	0	88
Total		22,733	76,183	98,916

Source: Whatcom County Six Year Capital Improvement Program (CIP) 2009-2014

- 1 The Sheriff's Office also has storage and evidence facilities at various locations in the County.
- 2 The County has two mobile homes and an old detention facility in Point Roberts but the County does not provide formal office space for the resident deputies stationed there. The resident deputies operate out of their homes or utilize space at the U.S. Customs office at the border.
- 3 The Sheriff's Office will vacate the office space at the Public Safety Building, Minimum Security Correction Facility, Inspector's Office at the Civic Center Building, and Cascade Satellite Office by 2015. Additionally, the Sheriff's Office will occupy the 4,500-square-foot space at the Laurel Fire Station by 2010 (space that was formerly occupied by Emergency Management).

Amend Table 4.10-2 and associated Emergency Operations inventory text found on page 4.10-3 of the Draft EIS (Section 4.10.1, *Police Services*) based on input provided by Sheriff's Office staff.

The Emergency Management/Emergency Operations Center (EOC), which serves the entire population of the County, presently occupies 2,250 or has access to 4,500 square feet in the Olympic Coordination Centera fire station. This inventory is shown in the Table 4.10-2 below.

Table 4.10-2. Emergency Operations Office Space

Facility Name	Location	Size (Sq. Ft.)
<u>Olympic Coordination Center</u> 6028 Guide Meridian	<u>3888 Sound Way</u> 6028 Guide Meridian	<u>2,250</u> 4,500
Total		<u>2,250</u> 4,500

Source: Dahl Pers. comm.~~Whatcom County Six Year CIP 2009-2014~~

Amend Table 4.10-3 found on page 4.10-3 of the Draft EIS (Section 4.10.1, *Police Services*) based on input provided by Sheriff's Office staff.

Table 4.10-3. Jail Facility Inventory

Facility Name	Location	Beds
Public Safety Building Jail	311 <u>Grand Ave.</u> Prospect Street	283
Minimum Security Correction Facility	2030 Division Street	150
Total		433

Note: Correction facilities are considered to be "full" when they have reached 95% of their maximum number of beds. Therefore, the Public Safety Building Jail is effectively out of beds once the inmate count has reached 268 beds and the Work Center has reached~~at~~ 143 beds (Note source: email communication from Wendy Jones, Chief of Whatcom County Sheriff's Office, Corrections Bureau (March 4, 2009).

Source: Whatcom County Six Year CIP 2009-2014 and email communication with Wendy Jones, Chief of Whatcom County Sheriff's Office, Corrections Bureau, (March 4 and March 10, 2009).

Page 4.10-5 of the Draft EIS, amend Sheriff's Office LOS analysis based on Sheriff's Office staff input (Section 4.10.1, *Police Services*).

~~The~~In addition, the County has plans to add 25,000 square feet of office space serving unincorporated Whatcom County by 2015. However, the Sheriff's Office would also switch other office space by 2015. With the new office and other space changes, there would be a total of 29,900 square feet of office space available by 2015. This would increase the amount of space available to 47,433 square feet for this facility type. Applying the established LOS standard to County population projections shows that with the additional space, there will be no deficiencies in office space for the Sheriff's Office serving unincorporated areas under any of the alternatives.

Table 4.10-6. Sheriff's Office (Unincorporated County) Level of Service Requirements Analysis

Time Period	County Population (Unincorporated)	Square Feet Needed to Meet LOS standard	Square Feet Available	Net Reserve or (Deficiency)
Current Sheriff's Office (Unincorporated County) LOS standard = 0.26 sq. ft. per capita				
2008	87,044	22,631	22,733	102
<u>Capacity Projects to 2015</u>				
<u>Sheriff's Office at Law and Justice Center Campus</u>		<u>+25,000</u>		
2015 No Action Current Comprehensive Plan Alternative	69,872	18,167	<u>29,900¹</u> 22,733	<u>11,733</u> 4,566
2015 No Action Trends Alternative	74,308	19,320	<u>29,900¹</u> 22,733	<u>10,580</u> 3,413
2015 Action Alternative X	70,104	18,227	<u>29,900¹</u> 22,733	<u>11,673</u> 4,506
2015 Action Alternative Y	73,237	19,042	<u>29,900¹</u> 22,733	<u>10,858</u> 3,691
<u>Capacity Projects to 2015</u>				
<u>Sheriff's Office at Law and Justice Center Campus</u>		<u>+25,000</u>		
2031 No Action Current Comprehensive Plan Alternative	75,253	19,566	<u>29,900¹</u> 47,733	<u>10,334</u> 28,167

Time Period	County Population (Unincorporated)	Square Feet Needed to Meet LOS standard	Square Feet Available	Net Reserve or (Deficiency)
2031 No Action Trends Alternative	89,829	23,356	29,900 ¹ 147,733	6,544 24,377
2031 Action Alternative X	76,015	19,764	29,900 ¹ 147,733	10,136 27,969
2031 Action Alternative Y	86,309	22,440	29,900 ¹ 147,733	7,460 25,293

1 Although the Sheriff's Office will add a new 25,000-square-foot law and justice center campus, the Sheriff's Office will also switch other office space by 2015. With the new office and other space changes, there would be a total of 29,900 square feet of office space available by 2015.

Pages 4.10-5 and 4.10-6 of the Draft EIS amend Emergency Management LOS analysis based on Sheriff's Office staff input (Section 4.10.1, *Police Services*).

Emergency Management Level of Service Analysis

The Whatcom County Comprehensive Plan establishes a LOS standard of 0.011 square foot of emergency management space per capita on a countywide basis. The County has an existing surplus of 149 square feet of emergency management space when using 2008 population estimates. ~~With growth to 2015, the County will show a slight deficiency over the 6-year period.~~

The County has one capacity project that will ~~provide~~^{add} 3,250 square feet of emergency management space, ~~increasing available space to 5,400 square feet.~~ This would ~~provide~~^{result in} a surplus of emergency management space through both 2015 and 2031 planning horizons for any of the alternatives.

Table. 4.10-7 Emergency Management Level of Service Requirements Analysis

Time Period	County Population	Square Feet Needed to Meet LOS standard	Square Feet Available	Net Reserve or (Deficiency)
Current Emergency Management LOS Standards = - 0.011 sq. ft. per capita				
2008	191,000	2,101	2,250 2,150	149 49
2015 No Action Current Comp Plan Alternative	204,366	2,248	2,250 2,150	(98) 2
2015 Other Alternatives	211,528	2,327	2,250 2,150	(477)
Capacity Projects to 2015				

Time Period	County Population	Square Feet Needed to Meet LOS standard	Square Feet Available	Net Reserve or (Deficiency)
Sheriff's Office Emergency Management space at Law and Justice Center Campus			+3,250 ¹	
2015 No Action Current Comp Plan Alternative	204,366	2,248	<u>3,2505,400</u>	<u>1,1023,452</u>
2015 Other Alternatives	211,528	2,327	<u>3,2505,400</u>	<u>9233,073</u>
2031 No Action Current Comp Plan Alternative	234,917	2,584	<u>3,2505,400</u>	<u>6662,816</u>
2031 Other Alternatives	258,448	2,843	<u>3,2505,400</u>	<u>4072,557</u>

1 There would be a total of 3,250 square feet available, because Emergency Management would move from the existing 2,250-square-foot space to a new 3,250 square-foot-space at the new Law and Justice Center Campus.

Amend second paragraph from the bottom of page 4.10-12 of the Draft EIS to clarify that North Whatcom Fire and Rescue is also known as Fire District 21 based on provider input (Section 4.10.2, *Fire and Emergency Medical Services*).

The cities of Bellingham and Lynden have their own fire departments. Fire District 7 serves the City of Ferndale and the Cherry Point UGA. North Whatcom Fire and Rescue (~~formerly~~ Fire District 21) serves the City of Blaine and the Birch Bay UGA. Fire District 14 serves the City of Sumas and the Columbia Valley UGA. Fire District 1 serves the cities of Everson and Nooksack.

Amend Table 4.10-10 on pages 4.10-13 and 4.10-14 of the Draft EIS to update fire facilities inventory based on updated plans and further provider input including responses to FPD14-2 and FPD21-2 (Section 4.10.2, *Fire and Emergency Medical Services*).

Table 4.10-10. Fire Facilities Inventory

Fire Protection Provider	Number of Stations	Fire Rating (1)	Fire Units (2)	EMS Services (Y/N)	Service Area Population (2008)	Serves UGA (Y/N)
City of Bellingham	8 (5)	3	22	Y	78,500	Y
City of Lynden	1	5	6	Y	11,350	Y
North Whatcom Fire & Rescue (District 21)	10 (9)	N/A	<u>3242</u> (3)	Y	<u>28,246</u> 29,823 (4)	Y

Fire Protection Provider	Number of Stations	Fire Rating ⁽¹⁾	Fire Units ⁽²⁾	EMS Services (Y/N)	Service Area Population (2008)	Serves UGA (Y/N)
Fire District 1	2	8T (10) N/A	10 (11) N/A	Y	8,460	Y
Fire District 4	3	6	13	Y	8,600 ⁽⁸⁾	Y
Fire District 5	2	6	6	Y	1,370	N
Fire District 7	6	6/5 (12) N/A	24 N/A	Y	19,530	Y
Fire District 8	4	N/A	N/A	Y	6,240	Y
Fire District 11	1	8	5	Y	1,610	N
Fire District 14	3	8	15 4	Y	7,262 ⁽⁸⁾	Y
Fire District 16	3	N/A	N/A	Y	1,160	N
Fire District 17	2	6	8	Y	1,520	N
Fire District 18	2	N/A	N/A	Y	2,460	N
Glacier Fire District 19	1	7	4	Y	1,630	N ⁽⁷⁾
South Whatcom Fire Authority	6	N/A See ⁽⁶⁾	26	Y	13,000 ⁽⁸⁾	Y

N/A = Not Available; Y/N = Yes or No

- 1 Fire rating is based upon the Washington Surveying and Ratings Bureau. Insurance companies use the Bureau's ratings to help determine insurance rates on all fire insurance policies.
- 2 Fire units include fire and/or emergency response units such as fire engines, water tenders, and medic units.
- 3 Apparatus Includes 11 ambulances, 10 engines/pumpers, 6 tenders, 1 aerial apparatus, and 4 brush trucks. Source: North Whatcom Fire and Rescue Draft Capital Facilities Plan, August 2009, Exhibit 2.18 primary apparatus
- 4 Population estimate is developed based on 2000 U.S. Census calculation of district population plus the City of Blaine, which annexed to the district in 2004 (2000 U.S. Census estimate found in District Plan, p. 3). Population estimates prepared for the CFP analysis indicates a lower population including Blaine of 23,570. See note 8 below for information about how the CFP population estimate was calculated. Source: North Whatcom Fire and Rescue Draft Capital Facilities Plan, August 2009.
- 5 2 of the 8 stations are medic stations that serve unincorporated areas of the County, one serving northwest and the other north and east of the Bellingham city limits. Station 1 also houses the countywide fire/EMS dispatch center. (Boyd, Bill, Fire Chief, Bellingham Fire Department, personal communication, April 14, 2009 email.)
- 6 At time of inventory, the South Whatcom Fire Authority has not received a rating for the whole agency. Agency was formed in January 2009. Currently, Geneva and Sudden Valley communities are rated Class 5; Yew Street Road and Chuckanut Drive areas are rated a Class 6; and the Lake Samish Area is rated Class 8.
- 7 Although Glacier Fire District 19 does not specifically serve the UGA, it is part of a mutual aid agreement that would provide back-up to Fire District 14 which does include UGA within its service area.
- 8 Population estimates prepared for the CFP analysis indicates the population in 2008 is approximately: Fire District 4 – 9,910; Fire District 14 – 9,830; and South Whatcom Fire Authority – 13,630. The difference in population is likely due to a different method or data source. The 2008 CFP estimate was developed using OFM estimates for incorporated cities and countywide building permit data between 2000 and 2008 for unincorporated areas and applying occupancy rates and household sizes based on US Census or American Community Survey information (Berk & Associates February 3, 2009).
- 9 Includes 3 career fire stations and 7 volunteer fire stations. Source: North Whatcom Fire and Rescue Draft Capital Facilities Plan, August 2009, Exhibit 1.
- 10 This indicates a tanker rating, which means that the rating is achieved through additional water for fire flow provided from tanker trucks (Personal email communication between Erin Osborn and Matt Aamot, July 14, 2009).

11 Per email communication between Erin Osborn and Matt Aamot (July 14, 2009), this figure includes 3 fire engines with 1,000 gallon water tanks, 2 tanker trucks with 3,000 gallon capacity (water delivery at 1,000 gallons per minute), 3 aid cars, and 2 rescue boats.

12 Fire rating for Cherry Point is 6 and fire rating for Ferndale is 5 (Russell and Cleanthous pers. comm.)

Source: Individual district plans and district communications with County staff.

Amend Table 4.10-11 on pages 4.10-15 and 4.10-16 of the Draft EIS to update fire district LOS analysis based on updated capital facility plans and further provider input (Section 4.10.2, *Fire and Emergency Medical Services*).

Table 4.10-11. Fire District Level of Service Analysis¹

Fire District	Average Calls For Fire and Aid Service (2006-2008)	Incidents per capita (2008)	Total Facility Size (2008) (Square Feet)	Level of Service Square Feet Per Incident	Projected Facility Reserve/(Deficit) Expressed in Square Feet of Facilities			
					2031 No Action Current Comp Plan Alternative	2031 No Action Trends Alternative	2031 Action Alternative X	2031 Action Alternative Y
Districts serving a portion of UGAs and Rural Areas								
Fire District 1	682.3	0.08	17,008	24.93	(3,291)	(4,483)	(5,558)	(6,964)
Fire District 4 (4)	531.3	0.05	25,314	47.64	(4,821)	(15,371)	(17,594)	(8,680)
Fire District 7	1,761	0.09	39,007	22.15	(11,412)	(16,378)	(19,035)	(22,264)
Fire District 8	1,025.3	0.17	28,460	27.76	(5,475)	(19,518)	(11,645)	(11,368)
Fire District 14 (4)	747.0	0.07	18,400	24.63	(2,929)	(9,798)	(3,556)	(8,450)
North Whatcom Fire and Rescue	2,362.3	0.10 (2)	72,422	30.66 35.64 (3)	(26,129) 42,136	(30,791) 47,556	(33,186) 59,340	(48,228) 67,824
South Whatcom Fire Authority (4)	734	0.05	35,418	48.25	(4,092)	(8,750)	(7,155)	(5,788)
Districts serving only Rural Areas								
Fire District 5	134.0	0.07	8,250	61.57	686	(230)	1,236	274
Fire District 11	60.67	0.04	4,200	69.23	(625)	(1,760)	(738)	(1,079)
Fire District 16	121.3	0.12	9,100	75.0	(1,672)	(3,120)	(1,672)	(2,577)
Fire District	89.7	0.06	6,892	76.86	(1,166)	(4,661)	(1,360)	(3,787)

Fire District	Average Calls For Fire and Aid Service (2006-2008)	Incidents per capita (2008)	Total Facility Size (2008) (Square Feet)	Level of Service Square Feet Per Incident	Projected Facility Reserve/(Deficit) Expressed in Square Feet of Facilities			
					2031 No Action Current Comp Plan Alternative	2031 No Action Trends Alternative	2031 Action Alternative X	2031 Action Alternative Y
17								
Fire District 18	118.7	0.05	5,400	45.51	149	1	128	(20)
Fire District 19	84.0	0.05	3,600	42.86	(175)	(403)	(175)	(380)

- 1 The steps used to calculate the results are as follows:
 - a) Determine incidents per capita: Average calls for service 2006-2008 supplied by Whatcom County Fire Marshal / 2008 estimated population (Appendix D)
 - b) Determine square feet per incident: Current square footage of fire stations supplied by Whatcom County Fire Marshal / Average calls for service 2006-2008
 - c) Calculate 2031 incidents: Future population of each alternative (Appendix D) x incidents per capita
 - d) Calculate square footage required: 2031 estimated incidents x Square feet per incident
 - e) Compare to square footage available: 2008 inventory of fire station square footage supplied by Whatcom County Fire Marshal
 - f) Calculate Reserve (Deficit): Square footage available – square footage required
- 2 The district's own population estimate of 2008 population (~~28,24629,823~~) is higher and was developed based on 2000 U.S. Census calculation of district population plus the City of Blaine, which annexed to the district in 2004 (District Plan, p. 3). Population estimates prepared for the CFP analysis indicate a lower population including Blaine of 23,570. If assuming the higher population, the incident per capita would be 0.08. For a conservative analysis the higher 0.10 rate was applied to the future growth numbers associated with each alternative. If using the Districts 2008 population as a base and the net increase of each alternative, the results would be 15% lower than the square footage estimates above.
- 3 North Whatcom Fire and Rescue prepared a draft Capital Facilities Plan (undated) that was reviewed and evaluated as part of the preparation of the Capital Facilities Plan. This undated version of the district's draft CFP included a square-foot-per-incident measurement as one of many factors reviewed in evaluating the district's ability to respond to emergency incidents, whether fire or medical (square feet per incident for North Whatcom Fire and Rescue was listed as 35.64 in the undated draft plan). Since that time, North Whatcom Fire and Rescue has prepared an updated Capital Facilities Plan (August 2009) which does not use a square-footage-per-incident analysis. The updated methodology relies on response time and fire station geographic coverage to arrive at a number of stations and apparatus needed to maintain recent ratios to existing development. Most fire districts in the County do not currently have the ability to derive this information. For this reason, and to ensure consistency of analysis, the North Whatcom Fire and Rescue square feet per incident in Table 4.10-11 has been changed to use the information obtained from the Whatcom County Fire Marshal's Office. The calculation using information obtained from the Whatcom County Fire Marshal's Office would indicate a LOS standard of 30.66 square feet/incident. However, since the North Whatcom Fire and Rescue District has prepared its own square feet per incident LOS standard which it proposes to use in the Draft North Whatcom Fire and Rescue Capital Facilities Plan (no date), the standard developed by the district is used in this table.
- 4 If using these district's own 2008 population estimates, the incidents per capita would be higher (incidents per capita divided by smaller population). The facility deficits would be approximately 16% higher for Fire District 4, 28% higher for Fire District 14, and 6% higher for the South Whatcom Fire Authority.

Source: ICF Jones & Stokes, Berk & Associates, and Whatcom County Fire Marshal's Office (2008).

Amend paragraph at the bottom of page 4.10-16 and top of page 4.10-17 of the Draft EIS in response to Bellingham-4 comment. (Section 4.10.2, *Fire and Emergency Medical Services*).

The character of UGA development is equally important in determining the efficiency of fire protection. Infilling in peripheral city areas may require new or relocated fire stations to quickly serve these areas. The nature of the infill development (adult versus family housing) can also have a major impact. Greater infill development in core urban areas will allow for greater efficiency of fire protection service as compared to UGA expansion or rural growth, which could increase driving distance and response time to the larger population. See Impacts by alternative below for how the location of future development and anticipated infill affects fire and EMS service provision.

Amend second full paragraph of page 4.10-17 of the Draft EIS in response to PUD-2 comment. (Section 4.10.2, *Fire and Emergency Medical Services*).

Fire flow is an aspect of fire protection related to the flow capacity of water systems. The purpose of fire flow requirements is to ensure adequate water is available for firefighting during structure fires. Under all alternatives, upgrades to water systems providing fire flows would be needed to achieve adequate fire flow in urban areas throughout the County. Fire flow would be addressed at the time of development applications and through water system planning (see Section 4.10.5, Water Systems, for further discussion).

Amend developed parks inventory found on pages 4.10-24 and 4.10-25 of the Draft EIS based on updated capital facilities information provided by Whatcom County Parks and Recreation Department. (Section 4.10.3, *Parks and Recreation*).

Inventory of Current Facilities

Parks

The County’s 2009 inventory of developed park facilities ~~is are~~ shown in Table 4.10-12 below. This inventory shows approximately ~~1,8471,511~~ acres of developed and/or usable parks at various locations throughout the County. The County owns a large amount of undeveloped park properties that serve a variety of passive park needs, such as hiking and wildlife viewing. In some cases, a portion of undeveloped park property may be converted to developed parks, reducing the overall cost of park development since the land is already owned by the County. This inventory does not include undeveloped parks that are not readily useable by the general public.

Table 4.10-12. Current Developed Park Inventory

Park Name	Capacity (Acres)
Monument Park	6.90

Park Name	Capacity (Acres)
Lighthouse Marine Park	20.50
Semiahmoo Park	17.90
Birch Bay Properties (includes several properties)	0.27
Sunset Farm Equestrian Center	69.50
Bay Horizon Park	48.00
Hovander Homestead Park/Tennant Lake Interpretive Center	333.40
Northwest Soccer Park & Northwest Baseball Complex	35.00
Alderwood Property	0.20
Bayview Marine	1.40
Teddy Bear Cove	11.19
Chuckanut Mountain Park	140.00
Nugent's Corner River Access	14.00
Lummi Island Stairway (Beach Access)	0.01
Samish Park	30.60
Squires Lake Park	84.20
Ted Edwards Park	3.90
Lake Whatcom Property North	218.00
Park Headquarters	4.50
Silver Lake Park	412.10
Maple Beach Park	0.50
Deming Homestead Eagle Park	33.00
Josh VanderYacht Memorial Park	3.00
Jensen Family Forest Park	22.70
<u>Point Whitehorn Marine Reserve Park</u>	<u>54.00</u>
<u>Lily Point Marine Reserve Park</u>	<u>276.00</u>
<u>Sunset Beach (Lummi Island)</u>	<u>6.00</u>
Total	<u>1,846.774,510.77</u>

Source: Whatcom County Six Year CIP 2009-2014 and Comprehensive Parks, Recreation and Open Space Plan (April 2008).

Amend second paragraph from the bottom of page 4.10-27 of the Draft EIS based on PUD #1 input related to Capital Facilities Plan. (Section 4.10.3, *Parks and Recreation*).

The Lynden Regional Parks and Recreation Department lists the following parks as included in the district: Bender Fields, Berthusen Park, Centennial Park, and Lynden City Park (Lynden Regional Parks

and Recreation Department May 2009), and all but Berthusen Park lie in the city limits. The Lynden Regional Parks and Recreation Department owns a portion (about 21 acres) of the Bender Fields Recreation Complex. The City of Lynden owns and maintains ~~The LRPRD only owns one park outside of Lynden's city limits: Berthusen Park~~ within the district boundaries and outside of the city limits. This park facility is approximately 300 acres and is located about 3 miles northwest of Lynden's city limits. Besides providing picnic areas and interpretive trails, Berthusen Park is also the home of the antique tractor showing grounds, the Lynden Shotgun Club, and the Lynden Model Airplane Club.

Amend the Developed Parks Level of Service analysis contained on page 4.10-28 of the Draft EIS and Table 4.10-16 found on page 4.10-29 of the Draft EIS based on Whatcom County Parks and Recreation Department input. (Section 4.10.3, *Parks and Recreation*).

Developed Parks Level of Service Analysis

The Whatcom County Comprehensive Plan outlines an LOS standard of 9.6 acres per 1,000 population for developed parks. Compared to the current inventory of 1,846 ~~1,510~~ acres of developed park, there is a 2008 ~~surplus~~ deficit of 12324 acres of developed park land. This would turn into a deficit of between 116 and 185 acres of park land, if no new projects were added ~~deficiency is expected to increase to between 452 and 521 acres of developed park land by 2015.~~

Accounting for the County's capacity projects in the 2010-2015 timeframe, the County expects to add approximately 730 acres of developed park to the park system by 2015. With this additional capacity, the County is expected to have a net reserve ~~of 209 to 278 acres~~ of developed park by 2015 and 2031.

~~Growth in the 2016-2031 timeframe is expected to result in another developed parks deficit of between 15 and 241 acres of developed park land by the 2031 planning horizon. The County can either add additional developed park capacity in that time frame or reduce its LOS standard by 0.933 acres of developed park per 1,000 population to a standard of 8.667 acres per 1,000 population. With this potential LOS standard, the County would be able to meet its developed parks needs to the year 2031.~~

Table 4.10-16. Developed Parks Level of Service Requirements Analysis

Time Period	County Population	Acres needed to meet LOS standard	Acres Available	Net Reserve or (Deficiency)
Existing Developed Parks LOS Standard = 9.6 acres per 1,000 population				
2008	191,000	1,834	<u>1,8461,510</u>	<u>12(324)</u>
2015 No Action Current Comp Plan Alternative	204,366	1,962	<u>1,8461,510</u>	<u>(116452)</u>
2015 Other Alternatives	211,528	2,031	<u>1,8461,510</u>	<u>(185521)</u>
Capacity Projects to 2015				
South Fork County Park			+582	
Sunnyside Landing Park			+6	
Dittrich Park Lake Samish			+24	
Cherry Point/ Point Whitehorn Industrial Area			+35	
Lake Whatcom County Park (south unit)			+83	
2015 No Action Current Comp Plan Alternative	204,366	1,962	<u>2,5762,240</u>	<u>614278</u>
2015 Other Alternatives	211,528	2,031	<u>2,5762,240</u>	<u>545209</u>
2031 No Action Current Comp Plan Alternative	234,917	2,255	<u>2,5762,240</u>	<u>321(15)</u>
2031 Other Alternatives	258,448	2,481	<u>2,5762,240</u>	<u>95(241)</u>
Potential Developed Parks LOS Standard = 8.667 acres per 1,000 population				
2031 No Action Current Comp Plan Alternative	234,917	2,036	2,240	204
2031 Other Alternatives	258,448	2,240	2,240	0

Amend first paragraph of Other Parks and Recreation District Level of Service Analysis found on pages 4.10-32 and 4.10-33 of the Draft EIS based on new parks master plan adopted for Northwest Parks and Recreation District. (Section 4.10.3, *Parks and Recreation*).

Other Parks and Recreation District Level of Service Analysis

~~Neither the Lynden Regional Parks and Recreational District, does nor the Northwest Parks and Recreation District~~ have established LOS standards. The City of Lynden has an established parks and recreation standard for parks and recreation facilities located within the city limits. The city's CFP specifically excludes Berthusen Park from its LOS analysis since the park is located outside city limits and serves as a regional park (page 229, City of Lynden Capital Facilities Element). As mentioned above, the Northwest Parks and Recreation District has only recently reactivated itself. The Northwest Parks and Recreation District adopted its Parks Master Plan on May 12, 2009. The district's new Master Plan contains LOS standards for neighborhood, community, and regional parks and trails. These LOS standards are as follows:

- Neighborhood Parks: 1.0 acre per 1,000 population
- Community Park: 5.2 acres per 1,000 population
- Regional/Facility: 7.0 acres per 1,000 population
- Trail: 0.5 acres per 1,000 population

It should be noted that Northwest Parks and Recreation District LOS standards do not represent County LOS standards for parks and trails.

Amend second paragraph under No Action Comprehensive Plan Alternative heading on page 4.10-34 of the Draft EIS based on Parks Department input. (Section 4.10.3, *Parks and Recreation*).

Based on established County LOS standard, the County experiences a current ~~deficit~~ reserve of developed parkland of approximately ~~324~~ 12 acres in 2008. ~~This deficit is expected to increase to 745 acres of developed park land by the year 2031 under the No Action Current Comprehensive Plan Alternative.~~ Thise reserve increases to 321 acres in 2031 ~~deficits are reduced to a 15-acre deficit~~ under the No Action Current Comprehensive Plan Alternative when accounting for the County 6-year plans for developed parks.

Amend second paragraph under No Action Trends Alternative heading on page 4.10-35 of the Draft EIS based on Parks Department input. (Section 4.10.3, *Parks and Recreation*).

Under the No Action Trends Alternative, the County's ~~surplus~~ deficit of developed park increases from ~~12324~~ acres in 2008 to ~~97195~~ acres in 2031. ~~This deficit is reduced to 241 acres by the year 2031 under the No Action Trends Alternative~~ when accounting for the County 6-year plans for developed parks.

Amend fourth bullet under Other Potential Mitigation Measures heading on page 4.10-37 of the Draft EIS based on Parks Department input. (Section 4.10.3, *Parks and Recreation*).

- The County could change its LOS standards for ~~parks, trails,~~ and activity centers to accommodate growth envisioned by 2031.

Amend Table 4.10-19, Bellingham School District Current Enrollment Capacity found on page 4.10-38 of the Draft EIS based on updated information received from the Bellingham School District. (Section 4.10.4, *Schools*).

Table 4.10-19. Bellingham School District Current Enrollment Capacity

<u>School</u>	<u>Current Enrollment Capacity</u>	<u>Portable Enrollment Capacity</u>	<u>Total Enrollment Capacity</u>
<u>Elementary</u>	-		
<u>Alderwood</u>	<u>338</u>	<u>45</u>	<u>383</u>
<u>Birchwood</u>	<u>203</u>	<u>113</u>	<u>315</u>
<u>Carl Cozier</u>	<u>360</u>	<u>0</u>	<u>360</u>
<u>Columbia</u>	<u>225</u>	<u>0</u>	<u>225</u>
<u>Geneva</u>	<u>450</u>	<u>45</u>	<u>495</u>
<u>Happy Valley</u>	<u>338</u>	<u>90</u>	<u>428</u>
<u>Larrabee</u>	<u>158</u>	<u>68</u>	<u>225</u>
<u>Lowell (temporarily closed)</u>	<u>293</u>	<u>0</u>	<u>293</u>
<u>Northern Heights</u>	<u>405</u>	<u>0</u>	<u>405</u>
<u>Parkview</u>	<u>338</u>	<u>23</u>	<u>360</u>
<u>Roosevelt</u>	<u>405</u>	<u>0</u>	<u>405</u>
<u>Silver Beach</u>	<u>405</u>	<u>0</u>	<u>405</u>
<u>Sunnyland</u>	<u>270</u>	<u>90</u>	<u>360</u>
<u>Wade King</u>	<u>450</u>	<u>0</u>	<u>450</u>
<u>Subtotal</u>	<u>4,635</u>	<u>473</u>	<u>5,108</u>
<u>Middle</u>	-		
<u>Fairhaven</u>	<u>650</u>	<u>0</u>	<u>650</u>
<u>Kulshan</u>	<u>650</u>	<u>25</u>	<u>675</u>
<u>Shuksan</u>	<u>525</u>	<u>0</u>	<u>525</u>
<u>Whatcom</u>	<u>450</u>	<u>100</u>	<u>550</u>
<u>Subtotal</u>	<u>2,275</u>	<u>125</u>	<u>2,400</u>

<u>School</u>	<u>Current Enrollment Capacity</u>	<u>Portable Enrollment Capacity</u>	<u>Total Enrollment Capacity</u>
High	-		
<u>Bellingham</u>	<u>1,050</u>	<u>0</u>	<u>1,050</u>
<u>Sehome</u>	<u>1,000</u>	<u>25</u>	<u>1,025</u>
<u>Squalicum</u>	<u>1,200</u>	<u>25</u>	<u>1,225</u>
<u>Subtotal</u>	<u>3,250</u>	<u>50</u>	<u>3,300</u>
Total K-12	10,160	648	10,808

Source: Bellingham School District No. 501 Capital Facilities Plan 2009-2015 (July 2009).

<u>School</u>	<u>Current Enrollment Capacity</u>
Elementary	-
<u>—Alderwood</u>	<u>357</u>
<u>—Birchwood</u>	<u>379</u>
<u>—Carl Cozier</u>	<u>513</u>
<u>—Columbia</u>	<u>223</u>
<u>—Geneva</u>	<u>469</u>
<u>—Happy Valley</u>	<u>446</u>
<u>—Larrabee</u>	<u>201</u>
<u>—Lowell</u>	<u>290</u>
<u>—Northern Heights</u>	<u>379</u>
<u>—Parkview</u>	<u>334</u>
<u>—Roosevelt</u>	<u>468</u>
<u>—Silver Beach</u>	<u>446</u>
<u>—Sunnyland</u>	<u>312</u>
<u>Subtotal</u>	<u>4,817</u>
Middle	-
<u>—Fairhaven</u>	<u>550</u>
<u>—Kulshan</u>	<u>675</u>
<u>—Shuksan</u>	<u>675</u>
<u>—Whatcom</u>	<u>625</u>
<u>Subtotal</u>	<u>2,525</u>
High	-
<u>—Bellingham</u>	<u>1,050</u>
<u>—Sehome</u>	<u>1,025</u>

School	Current Enrollment Capacity
—Squalicum	1,225
Subtotal	3,300
Total K-12	10,642

Source: Bellingham School District No. 501 Capital Facilities Plan 2004-2009 (March 2004).

Amend Table 4.10-22, Lynden School District Current Enrollment Capacity found on page 4.10-41 of the Draft EIS based on updated information received from the Lynden School District. (Section 4.10.4, *Schools*).

Table 4.10-22. Lynden School District Current Enrollment Capacity

School	Current Enrollment Capacity
Elementary/Intermediate	
Bernice Vossbeck Elementary (Grades K-5)	369
Fisher Elementary (Grades K-2) (1)	360
Isom Intermediate (Grades 3-5) (1)	390
Subtotal	1,119
Middle	
Lynden (2)	550
Subtotal	550
High	
Lynden (3)	550
Subtotal	550
Total K-12	2,219

Note: Lynden School District also provides instruction through the Parent Partnership Program (grades K-12) and at Timber Ridge Alternative School (grades 6-12). These programs are housed in leased facilities and are, therefore, not included in the district's inventory of permanent facilities.

- Capacity figure includes 1 portable classroom at both Fisher and Isom elementary schools.
- Enrollment capacity includes 4 portable classrooms.
- Enrollment capacity includes 6 portable classrooms.

Source: Lynden School District No. 504 Six Year Capital Facilities Plan (June 2006)

Amend Table 4.10-23, Meridian School District Current Enrollment Capacity found on page 4.10-42 of the Draft EIS based on updated information received from Meridian School District. (Section 4.10.4 *Schools*).

Table 4.10-23. Meridian School District Current Enrollment Capacity

School	Permanent Enrollment Capacity	Portable Enrollment Capacity	Total Enrollment Capacity
Elementary			

<u>Irene Reither Primary (grades K-3)</u>	<u>380</u>	<u>100</u>	<u>480</u>
<u>Ten Mile Creek (Grades 4-5)</u>	<u>164</u>	<u>100</u>	<u>264</u>
<u>Subtotal</u>	<u>544</u>	<u>200</u>	<u>744</u>
Middle			
<u>Meridian Middle School</u>	<u>494</u>	<u>0</u>	<u>494</u>
<u>Subtotal</u>	<u>494</u>	<u>0</u>	<u>494</u>
High			
<u>Meridian High School</u>	<u>460</u>	<u>50</u>	<u>510</u>
<u>Subtotal</u>	<u>460</u>	<u>50</u>	<u>510</u>
Total K-12	<u>1,498</u>	<u>250</u>	<u>1,748</u>

Source: Meridian School District No. 505 Capital Facilities Plan 2009-2015, Adopted June, 2009, and personal communication Timothy Yeomans, Meridian School District (July 30, 2009).

School	Current Enrollment Capacity
Elementary	
<u>Irene Reither Primary (grades K-3)</u>	<u>480</u>
<u>Ten Mile Creek (Grades 4-5)</u>	<u>264</u>
<u>Subtotal</u>	<u>744</u>
Middle	
<u>Meridian Middle School</u>	<u>494</u>
<u>Subtotal</u>	<u>494</u>
High	
<u>Meridian High School</u>	<u>510</u>
<u>Subtotal</u>	<u>510</u>
Total K-12	<u>1,748</u>

Note: Current enrollment capacity is expressed in permanent capacity only.

Source: Draft Meridian School District No. 505 Capital Facilities Plan 2009-2015, 2009.

Amend text under Mount Baker School District and Table 4.10-24, Mount Baker School District Current Enrollment Capacity found on page 4.10-42 of the Draft EIS based on updated information received from Mount Baker School District. (Section 4.10.4, *Schools*).

Mount Baker School District

The Mount Baker School District ~~includes~~ serves the Columbia Valley UGA and rural areas in eastern Whatcom County as the only urban area within the school district's boundaries. The current enrollment capacity and inventory of facilities is shown in Table 4.10-24 below.

Table 4.10-24. Mount Baker School District Current Enrollment Capacity

<u>School</u>	<u>Permanent Enrollment Capacity</u>	<u>Portable Enrollment Capacity</u>	<u>Total Enrollment Capacity</u>
<u>Elementary</u>	-		
— Acme	206	66	272
— Harmony	300	44	344
— Kendall	412	176	588
<u>Subtotal</u>	<u>918</u>	<u>286</u>	<u>1,204</u>
<u>Junior High</u>			
— Mount Baker	275	0	275
<u>Subtotal</u>	<u>275</u>	<u>0</u>	<u>275</u>
<u>Senior High</u>			
— Mount Baker	1,175	0	1,175
<u>Subtotal</u>	<u>1,175</u>	<u>0</u>	<u>1,175</u>
<u>Total K-12</u>	<u>2,368</u>	<u>286</u>	<u>2,654</u>

Source: Mount Baker School District Six-Year Capital Facilities Plan (February 2006) and Frey pers. comm.

<u>School</u>	<u>Current Enrollment Capacity</u>
<u>Elementary</u>	-
— Acme	274
— Harmony	407
— Kendall	574
<u>Subtotal</u>	<u>1,255</u>
<u>Junior High</u>	
— Mount Baker	428
<u>Subtotal</u>	<u>428</u>
<u>Senior High</u>	
— Mount Baker	944
<u>Subtotal</u>	<u>944</u>
<u>Total K-12</u>	<u>2,627</u>

Source: Mount Baker School District No. 507 Study & Survey (2006)

Amend Table 4.10-25, Nooksack Valley School District Current Enrollment Capacity found on page 4.10-43 of the Draft EIS to correct a subtotal and the subsequent total numbers on the table. (Section 4.10.4, *Schools*).

Table 4.10-25. Nooksack Valley District School District Current Enrollment Capacity

School	Current Enrollment Capacity
Elementary	
Sumas	320
Nooksack	360
Everson	300
Subtotal	<u>980660</u>
Middle	
Nooksack Valley Middle School	762
Subtotal	762
Senior	
Nooksack Valley High	960
Subtotal	960
Total K-12	<u>2,702,382</u>

Note: Capacity figures based on ratio of 20 students per room (K-3), 25 students per room (4-6), 30 students per room (7-12), and 12 handicapped students per room (K-12).

Source: Cities of Everson, Nooksack, and Sumas Comprehensive Plan Capital Facilities Element

Amend LOS capacity analysis text for school districts found on pages 4.10-44 through 4.10-45 of the Draft EIS, including tables 4.10-26 and 4.10-27, based on revised inventory numbers and planned facilities input provided by school districts. (Section 4.10.4, *Schools*).

The 2015 LOS analysis shows that only Bellingham and Lynden~~Mount Baker and Nooksack~~ school districts experience net capacity ~~deficits~~reserve throughout all alternatives in the 2015 timeframe. Although Bellingham School District shows a net student capacity deficit in 2015, it should be noted that the Office of Superintendent of Public Instruction (OSPI) projects Bellingham’s student enrollment to actually decline between 2009 and 2014, rather than increase (OSPI 2009). The Blaine School District only shows a projected deficit in Action Alternative Y in 2015. Ferndale is the only other school district to experience a net capacity reserve in this LOS analysis, and that occurs only during the 2015 No Action Current Comprehensive Plan Alternative.

Table 4.10-26. Whatcom County School District 2015 Level of Service Analysis: Student Capacity¹

School District	Student/ Household Ratio	2015 No Action Current Comprehensive Plan Alternative (students)	2015 No Action Trends Alternative (students)	2015 Action Alternative X (students)	2015 Action Alternative Y (students)
Bellingham ²	0.263	(92.79708.79)	(420.714,036.74)	(620.664,236.66)	(128.78744.78)
Blaine ³	0.372	104.57(75.43)	64.93(115.07)	53.61(126.39)	(99.26279.26)
Ferndale	0.528	491.2871.28	177.76(242.24)	306.38(113.62)	81.29(338.74)
Lynden ⁴	0.466	(477873.14)	(505904.51)	(6404,036.26)	(6824,078.81)
Meridian ⁵	0.565	542.49(653.51)	499.53(696.47)	533.9(662.10)	473.75(722.25)
Mount Baker	0.312	473.99446.99	312.46285.46	469.24442.24	369.47342.47
Nooksack Valley	0.567	956.57636.57	930.69640.69	870.29550.29	827.14507.14

¹ LOS analysis compares the student enrollment capacity of school districts. Where information is available, it includes portable facilities.

² The LOS analysis for Bellingham School District accounts for the additional 450 student capacity over existing inventory that are included in the district's 6-year capital facilities plan (Bellingham School District 2009).

³ The LOS analysis for Blaine School District accounts for the addition of 180 student capacity resulting from upgrades to the high school building (Kenoyer pers. comm.).

⁴ The LOS analysis for Lynden School District accounts for the additional 396 student capacity over existing inventory that are included in the district's 6-year capital facilities plan (Lynden School District).

⁵ The LOS analysis for the Meridian School District accounts for the additional 324 permanent student capacity over existing inventory that are included in the district's 6-year capital facilities plan (Meridian School District, 2009), as well as 400 student capacity in the form of portables (Yeoman pers. comm.).

Table 4.10-27 below shows school district LOS capacity in 2031. As can be seen by this analysis, deficits are experienced in many school most districts under most alternatives by 2031. The Bellingham and Lynden school districts experience deficits under all alternatives in 2031. The Blaine School District experiences a net capacity reserve only under the No Action Current Comprehensive Plan scenario, while the Mount Baker School District only experiences a capacity deficit under the No Action Trends Alternative. The Ferndale, Meridian, and Nooksack Valley school districts experience net capacity reserves under all alternatives in 2031. The Mount Baker school district experiences net capacity reserves under the No Action Current Comprehensive Plan Alternative and Action Alternative X scenarios, while Nooksack Valley School District experiences net capacity reserves under all alternatives except Action Alternative Y. School districts can address deficiencies through additional capacity projects during the planning period, by adding temporary classroom spaces (e.g. portable classrooms), or by increasing

the number of students accommodated in a classroom (adjusting LOS standards).

Table 4.10-27. Whatcom County School District 2031 Level of Service Analysis: Student Capacity¹

School District	Student/ Household Ratio	2031 No Action Current Comprehensive Plan Alternative	2031 No Action Trends Alternative	2031 Action Alternative X	2031 Action Alternative Y
Bellingham ²	0.263	(1,920.92,536.90)	(2,998.333,614.33)	(3,655.314,274.34)	(2,039.152,655.15)
Blaine ³	0.372	70.43(709.57)	(59.79839.79)	(97.00877.00)	(599.291,379.29)
Ferndale ⁴	0.528	1,432.78(737.22)	402.63(1,767.37)	825.25(1,344.75)	85.66(2,084.34)
Lynden ⁵	0.466	(806.614,602.64)	(899.824,695.82)	(1,342.572,438.57)	(1,482.392,278.39)
Meridian ⁶	0.565	326.46(869.54)	185.31(1,040.69)	298.23(897.77)	100.62(1,095.38)
Mount Baker	0.312	343.68346.68	(187.07214.07)	328.07301.07	0.25(26.75)
Nooksack Valley	0.567	660.74340.74	575.68255.68	377.2357.23	235.47(84.53)

- ¹ LOS analysis compares the student enrollment capacity of school districts. Where information is available, it includes portable facilities.
- ² The LOS analysis for Bellingham School District accounts for the additional 450 student capacity over existing inventory that are included in the district's 6-year capital facilities plan (Bellingham School District, 2009).
- ³ The LOS analysis for Blaine School District accounts for the addition of 180 student capacity resulting from upgrades to the high school building occurring in the six-year planning period, as well as the addition of 600 more student capacity arising from a new elementary school planned for late in the 2031 planning period (Kenoyer pers. comm.).
- ⁴ The LOS analysis for Ferndale School District accounts for the additional 1,750 student capacity over existing inventory that are included in the 7-20 year period in the district's 2005 Capital Facilities Plan (Ferndale School District, 2005). There are no capacity projects identified in the 6-year planning period.
- ⁵ The LOS analysis for Lynden School District accounts for the additional 396 student capacity over existing inventory that are included in the district's 6-year capital facilities plan (Lynden School District).
- ⁶ The LOS analysis for the Meridian School District accounts for the additional 324 permanent student capacity over existing inventory that are included in the district's 6-year capital facilities plan (Meridian School District, 2009), as well as 400 student capacity in the form of portables (Yeomans pers. comm.).

Amend text relating to impact analysis under each alternative for school districts found starting with first paragraph on page 4.10-46 and ending with last paragraph on page 4.10-47 of the Draft EIS based on updated inventory and planned capacity projects provided by various school districts. (Section 4.10.4, *Schools*).

Generally, each school district has adopted its own CFP to outline what capital facility improvements will be made to serve the anticipated school enrollment. ~~However, based on the age of existing CFPs, this analysis only accounts for existing capacity.~~ Funding for each district is generated from a variety of sources including impact fees, city and

county property taxes, and state and federal funding based on student enrollment.

Table 4.10-27 summarizes projected capacity surpluses and deficits in 2031 based on current capacity, and where available, projected capacity and future enrollment under the alternatives. Estimated enrollment in 2031 is district-wide, including both unincorporated and incorporated areas. ~~The facility need, or surplus capacity where applicable, is calculated based on the existing capacity, and assumes no improvements that would increase capacity.~~ It should be noted that the student generation rates and calculated enrollment ratios vary considerably among the seven districts; therefore, projected enrollment increases are not in proportion with the projected population growth as distributed among the districts.

No Action Current Comprehensive Plan Alternative

The No Action Current Comprehensive Plan Alternative both provides the least population growth as a whole and the least growth in student population in each of the seven school districts considered.

As reflected in the 2031 LOS analysis in Table 4.10-27 above, the No Action Current Comprehensive Plan Alternative produces student enrollment deficits only in the Bellingham and Lynden in almost all of the school districts being reviewed. ~~This is also the only alternative in which the Blaine School District~~ Exceptions include the Nooksack Valley School District and Mount Baker School District, which shows a small net reserve of student enrollment capacity in 2031.

No Action Trends Alternative

The No Action Trends Alternative provides the same overall population growth as both Action Alternative X and Action Alternative Y below. However, the expected locations of growth are different under each alternative, resulting in varying levels of projected student population growth for each district. The No Action Trends Alternative produces the largest projected student generation for the Mount Baker School District of all alternatives, reflecting the nature of this school district located in unincorporated rural Whatcom County.

As reflected in the 2031 LOS analysis in Table 4.10-27 above, the No Action Trends Alternative produces student enrollment deficits in almost all of the school districts being reviewed. The exceptions is are that the Ferndale and Nooksack Valley S school D districts show has a small net reserves of student enrollment under this alternative. The Mount Baker School District experiences its only largest student enrollment deficit

under the No Action Trends Alternative, reflecting the greater level of population growth in unincorporated rural areas under that alternative.

Action Alternative X

Action Alternative X focuses growth in the County's traditional large-city UGA of Bellingham, with a lesser amount of growth going to other County UGAs. As would be expected, this alternative produces the largest student generation rate for the Bellingham School District of all alternatives. Other school districts serving the smaller County UGAs are expected to increase student enrollment compared to the No Action Current Comprehensive Plan Alternative, but not as much as under Action Alternative Y.

As found in the 2031 LOS analysis above, Action Alternative X produces student enrollment deficits in the Bellingham, Blaine, and Lynden all-school districts, ~~except Nooksack Valley and Mount Baker school districts~~. Action Alternative X produces the largest student capacity deficit in the Bellingham School District compared to other alternatives.

Action Alternative Y

Action Alternative Y focuses growth in the County's smaller UGAs and towns, with growth also going to Bellingham and its UGA, though not in as large a concentration as under Action Alternative X. Action Alternative Y produces the largest student enrollments in 2031 for all school districts except Bellingham and Mount Baker noted in other alternatives above.

The results of the 2031 LOS analysis listed in Table 4.10-27 indicate that the Bellingham, Blaine, and Lynden ~~most~~ school districts' student enrollments exceed ~~existing~~ facility capacity. ~~Action Alternative Y is the only alternative where the Nooksack Valley School District, serving the Everson, Nooksack, and Sumas UGAs shows a deficit.~~ This alternative ~~also~~ shows the largest student enrollment facility deficit for the Blaine, ~~Ferndale, and Lynden, and Meridian~~ school districts. The Ferndale, Meridian, and Nooksack Valley school districts also show their lowest capacity reserves under this alternative.

Amend text relating to Applicable Regulations and Commitments under Mitigation Measures for school districts except for the Nooksack Valley School District found on page 4.10-48 of the Draft EIS based on updated inventory and planned capacity projects provided by various school districts. (Section 4.10.4, *Schools*).

Applicable Regulations and Commitments

- School Districts' 6-Year Capital Improvement Program should be regularly updated to plan for growth over time.
 - **Bellingham School District.** According to the Bellingham School District No. 501 2009-2015 Capital Facilities Plan, new growth over the next 6 years will create the need to complete one new elementary school which is expected to add to student enrollment capacity by 450 students. An extensive review of existing facilities will be conducted as part of future bond issues during which, the district will reevaluate enrollment projections and identify additional capacity enhancement projects (Bellingham School District 2009). The Bellingham School District's Capital Facilities Task Force identified several projects as first and second priorities over the 2005–2015 time period. Among these priorities include the possible construction of two additional elementary schools, possible purchase of a future school site, and possible renovation and seismic upgrades at several existing school sites. These projects are expected to add capacity and reduce enrollment deficits identified above.
 - **Blaine School District.** The Blaine School District's December 2007 Study and Survey indicate s that the city has plans to purchase a school site in the Birch Bay area that will allow for future expansion of K–12 education facilities beyond the single 38-acre campus that the district owns in Blaine (Kenoyer pers. comm.). The December 2007 study and survey also includes projects related to the modernization and expansion of the existing high school (expected to add 23 general classrooms), conversion of primary school play sheds to classrooms, elementary school additions, and gym conversion and modernization for the middle school. The district expects that improvements to the high school will provide additional capacity of up to 720 students in the 6-year planning period (Kenoyer pers. comm.). In addition, the District also has longer-term plans for the construction of a new elementary school in the latter part of the district's 20-year planning horizon (Kenoyer pers. comm.). The study and survey identifies projects and costs in the 6-year planning period.
 - **Ferndale School District.** The Ferndale School District has plans to construct one elementary school and one high school beyond the six year planning period. These projects are expected to add approximately 1,750 classroom capacity spaces. ~~The Ferndale School District has plans to construct one elementary and one high school during the planning period. These projects are expected add capacity and reduce enrollment deficits identified above.~~
 - **Lynden School District.** The Lynden School District has plans to construct one middle school during the planning period. This project, which occurs in the 6-year planning period, will add space for approximately 300 students to the district's enrollment capacity. In addition, the district's Six-Year Capital Facilities Plan (June 2006)

identifies an additional capacity of 60 students resulting from the Fisher Elementary modernization project, and an additional 36 students resulting from the Isom Elementary expansion project. Additional capacity for projects outside the 6-year planning period are not identified in the district's adopted Six-Year Capital Facilities Plan. However, the district indicates that construction of a middle school to replace the current middle school, and construction of an additional elementary school that could accommodate up to 400 additional students are projects that the district is considering in the long term (Thompson pers. comm.). These projects, which occurs in the 6-year planning period, will add enrollment capacity that is expected to reduce enrollment deficits identified above.

- **Meridian School District.** The Meridian School District plans to construct additions to two of its schools during the planning period. Planned additions in the district's 6-year planning period include constructing an instruction space at Meridian High School and acquiring land for a new elementary school. Near-term improvements also include upgrades and modernizations to Meridian High School, Irene Reither Primary School, and Ten-Mile Creek. Six-year plan improvements are expected to provide additional capacity for 144 elementary students and 180 additional high school students (Meridian School District No. 505 Capital Facilities Plan 2009-2015, Adopted June 2009, page 7). The district also plans to address additional student capacity needs in the 6-year period through acquiring portables that could accommodate up to 400 additional students (Yeomans pers. comm.). Planned additions include construction of instruction space at Meridian High School, a remodel that includes additional classroom space at Meridian Middle School, as well as acquisition of land and construction of an elementary school. Phase 2 improvements, beyond the 6-year planning period include a remodel that consists of additional classroom space at Meridian Middle School, as well as construction of a new elementary school. Phase 2 also includes upgrade and modernization projects. However, the district's 2009-2015 Capital Facilities Plan does not identify the amount of capacity expected to be provided by these longer term projects. The district will continue to actively monitor enrollment projections and respond by programming additional projects as needed. These projects are expected to maintain ~~reduce~~ enrollment ~~reserves~~ ~~deficits~~ identified above.
- **Mount Baker School District.** The Mount Baker School District Six-Year Capital Facility Plan (February 2006) indicates that due to growth potential over the 6-year planning period the district may need to construct an additional elementary school. A 2006 study and survey prepared for the district indicates that the district also plans to construct an addition to one of its schools during the planning period. The district is not projected to have an enrollment deficit in 2015. However, the capacity projects noted above are ~~this upgrade to the~~

~~district's junior high school is~~ expected to reduce enrollment deficits that are identified under ~~someone~~ alternatives in 2031 and to maintain a capacity reserve in the other alternatives.

Amend Table 4.10-29 Water System Inventory to incorporate updated information provided by water service providers and to update water rights information as provided in Ecology-10 comments. This table is found on pages 4.10-51 of the Draft EIS. (Section 4.10.5, *Water Systems*).

Table 4.4-1. Water System Inventory (Serving UGAs)

System Name	Connections		Water Rights ¹			Capacity		Service Area		System Owner or Operator
	Existing	Approved	Qa (afy)	Qi (gpm)	Qi (cfs)	Source Capacity (gpm)	Storage Capacity (MG)	2008 Population Served ²⁽¹⁾	Existing Connections (ERU)	
City of Bellingham	26,259	unspecified	Not determined 80,000	412,208	125 250	25,000	25.4	85,538 81,454	51,845 ³	City of Bellingham
Water District 2	564	821	See ⁴ N/A	See ⁴ N/A	See ⁴ N/A	1,100	26.3	1,472 1,348	N/A	Water District 2
Water District 7	634 660	1,145	See ⁴ N/A	See ⁴ 500	See ⁴	500	0.33	1,991 1,405	634 N/A	Water District 7
Lake Whatcom Water & Sewer	3,719 ⁵ 2,845	unspecified	1,758.32 108	1,946 860	5	4,074 ⁵ 750	2.5 ⁵	10,881 6,884 (+)	2,845 3,719 ⁵	Lake Whatcom Water System
City of Blaine	8,695 ⁶ 2,421	unspecified	2,560 4,250	2,170 6,150		3,044	4.6	4,676 4,855	8,695 ⁶ —	City of Blaine
Birch Bay Water and Sewer District System	4,583	unspecified	See ⁷ N/A	See ⁷ 500	See ⁷	800	3.1	6,168 7,050 (+)	5,877	Birch Bay Water and Sewer District System
Evergreen Water and Sewer District	1,243 ⁸ 4,367 (-)	1,423	427 N/A	500 2,475		400	0.8	3,074 2,170 (+)	1,243 ⁸ 4,367 (-)	Evergreen Water and Sewer District
Water District 13	347	1,338	454 166	450 000		900	0.3	953 795 (-)	347	Water District 13
City of Everson	789	unspecified	601 N/A	800 820		1,700	0.48	2,300 2,170	801	City of Everson
City of Ferndale	4,696	unspecified	2,055 7,702	2,870 5,993		5,800	2.7	10,902 10,280	N/A	City of Ferndale
PUD #1	N/A	N/A	49,923 8 ⁹ 50,066	4,666	83	24,684 ¹⁰ (4)	0.03	32 ¹¹ 0 (+)	N/A	PUD 1
City of Nooksack	448	unspecified	See ¹² 540	See ¹² 316	See ¹²	316	0.7	1,103 1,075	315 N/A	City of Nooksack

City of Sumas	496	unspecified	<u>3,744</u> ¹³ 3,322.5	<u>3,910</u> ¹³ 3,110		5,100	0.5	<u>1,300</u> 1,264	400	City of Sumas
City of Lynden	4,400	unspecified	<u>1,792</u> ¹⁴ 6,623.5 ⁽²⁾	<u>44,734</u> ⁽²⁾	<u>11.7</u> ¹⁴	2,917	4.2	<u>11,445</u> 11,150	<u>3,820</u> ¹⁵ 7,495	City of Lynden

Qa = Annual Quantity; Qi = Instantaneous Quantity; afy = acre feet per year; gpm = gallons per minute; cfs = cubic feet per second.

1 Water rights are as provided by Ecology comment letter from Doug Allen to David Stalheim, June 22, 2009.

2 Population source: Berk & Associates, 2009.

3 Source: City of Bellingham Water System Plan, June 2009, page 2-9.

4 Purchases water from City of Bellingham (Ecology June 22, 2009).

5 Lake Whatcom Water and Sewer District Water System Comprehensive Plan (August 2009). Note: Source and storage capacity consists of compilation of the component systems found on District's Water Facilities Inventory forms located in Section 10 of Plan.

6 Source: Blaine Water System Plan (July 2008), Table 2.7 ERU estimate for the year 2006.

7 Purchase water from City of Blaine (Ecology June 22, 2009).

8 Source is from Washington Department of Health website: <http://www4.doh.wa.gov/sentryinternet/Intro.aspx>, Accessed July 29, 2009).

9 Of this amount, 6,264 afy is for irrigation supply only (Ecology July 22, 2009).

10 Source is from Whatcom County Coordinated Water System Plan's System Assessment and Inventory (March 1999).

11 Population for PUD 1 is only 32 because the majority of the PUD service area consists of commercial and industrial customers.

12 Purchases water from City of Sumas (Ecology June 22, 2009)

13 Of these amounts, 422.2 afy/ 299 gpm is to be used for streamflow mitigation only (Department of Ecology, June 22, 2009)

14 Lynden also holds a surface water right for 70 afy/ 0.57 cfs to serve (only) the EDB and 1, 2 DCP contaminated area west of the City (Ecology June 22, 2009). Note: per Ecology comment letter of June 22, 2009, City of Lynden asserts that they have 6,623.5 afy for Qa and 14,734 gpm for Qi. Ecology believes, supported by state Attorney General review, that Lynden has 1,792 afy and 11.7 cfs (5,251 gpm). Ecology is currently entered into a Memorandum of Understanding with Lynden that precludes enforcement on their continued exceedence of their water right, until such time as Ecology and Lynden resolve the dispute over their rights, the city acquires more rights, or city work within their existing rights in city planning and development (Ecology June 22, 2009).

15 City of Lynden Water System Plan, August 2008, p. 1-4, Table 1-1.

1—Where noted, population derived from system plan rather than 2008 source.

2—These figures include three pending water right applications totaling 4,624 gpm and 3.5 acre-ft/year noted in Lynden System Plan.

3—Source is from Foothill Subarea Plan Final Supplemental Environmental Impact Statement (December 2008).

4—Source is from the CWSP's System Assessment and Inventory (March 1999).

Amend the last paragraph on page 4.10-52 of the Draft EIS to correct the City of Sumas Water System Plan’s projected population. (Section 4.10.5, *Water Systems*).

Table 4.10-31 provides an overview of the planning horizon year and population for the latest urban water system plans (WSP) in comparison to Whatcom 2031 population projections. As can be seen by a review of the table, most urban water systems plan conservatively for drinking water needs, particularly given the time it takes to seek new water supplies to serve growth. Evergreen Water District’s WSP projected population of 3,000 is lower than that found under all four 2031 alternatives being considered. The City of Everson’s WSP projected population of 3,114 is lower than those projected for the city’s water service area under the No Action Current Comprehensive Plan Alternative, Action Alternative X, and Action Alternative Y. Nooksack’s WSP projected population is lower than the Whatcom 2031 projections for both Action Alternative X and Action Alternative Y. Sumas’ WSP projected population of ~~1,6251,825~~ is lower than that found in the No Action Trends Alternative, Action Alternative X, and Action Alternative Y. Although Lake Whatcom Water District’s 2020 horizon year population is lower than all four Whatcom 2031 population projections for the district, the district’s plan also includes a build-out population which is more conservative than the populations considered in the Whatcom 2031 plan.

Amend Table 4.10-31 found on page 4.10-53 of the Draft EIS to incorporate updated information provided by various water service providers. (Section 4.10.5, *Water Systems*).

Table 4.10-31. Population Comparison: Water Plans and Regional Growth Alternatives

Service Provider	Horizon Year of Capital Plan	Capital Plan Population	Horizon Year ADD (mgd)	No Action Current Comp Plan Alternative	No Action Trends Alternative	Action Alternative X	Action Alternative Y
Birch Bay Water/ Sewer	2035	12,913 12,913,326	1.712 1.712-39	9,775	9,307	9,534	11,855
City of Bellingham	2028	122,672	18.3	106,928	114,679	121,444	108,855
City of Blaine	2027	11,587	3.45	6,392	6,873	7,599	7,962
City of Everson	2022	3,114	0.46 (5)	3,307	2,978	3,968	4,157
City of Ferndale	2026	19,334	1.84	14,969	15,006	16,713	17,446
City of Lynden	2027	20,120	4.0	14,993	16,025	17,347	16,935
City of Nooksack	2022	1,881	N/A (7)	1,689	1,658	2,129	2,250

Service Provider	Horizon Year of Capital Plan	Capital Plan Population	Horizon Year ADD (mgd)	No Action Current Comp Plan Alternative	No Action Trends Alternative	Action Alternative X	Action Alternative Y
City of Sumas	2018	1,625	N/A (7)	1,670	1,788	2,009	2,032
Evergreen Water and Sewer District	2023	3,000	N/A (7)	3,789	4,777	3,673	4,634
PUD 1	N/A (3)	N/A (3)	N/A (3)	32	32	32	32
Lake Whatcom Water and Sewer (W.C. Water Dist. 10)	2027 2029	10,855 9,596 (4)	0.87 N/A (7)(9)	11,239	11,566	11,323	11,400
W.C. Water Dist. 2	2029 2023	N/A 3,500 (8)	0.250 0.28 (6)	1,602	1,789	1,714	1,645
W.C. Water Dist. 13	2024	N/A (2)	0.39 (6)	1,332	3,082	1,411	2,433
W.C. Water District 7	2027	2,100 N/A (1)	0.20 (6)	2,410	3,263	2,569	2,765

Notes:

N/A = Not Available

All figures in this table, unless noted below, are population figures. Employment or residential equivalents are not considered in this table unless specifically noted.

- Water District 7 only identifies connections rather than population. The district plans to serve 880 connections. The district plans to serve 888 connections by 2027. Applying the Bellingham average household size of 2.5 people and occupancy rate of 94.4% results in approximately 2,100 people served by the 888 connections in 2027. However, Water District 7 is approved to serve up to 1,145 residential service connections (State Department of Health letter from Richard Rodriguez and John Thielmann to James Trowbridge dated January 5, 2009). Therefore the district could serve a population of about 2,700.
- Water District 13 does not identify population. It plans to serve a total of 1,338 connections. Applying the Peaceful Valley Census Designated Place average household size of 2.79 and an occupancy rate of 79.8% results in approximately 2,979 people that could be served by the 1,338 connections in 2024.
- Since PUD1 provides retail water service only to areas characterized by and designated for industrial and commercial uses, the district's 2004 Water System Plan (WSP) does not provide population projections or a horizon year. PUD 1 also owns and operates the Grandview potable water supply system – retail (Jilk, Stephan, PUD 1, memorandum to Matt Aamot commenting on Whatcom County 10-Year Urban Growth Area review documents, April 20, 2009).
- Population is expressed in terms of ERUs in the WSP. Although Lake Whatcom Water and Sewer District's 2027 horizon year anticipates a population of 10,855, 9,596 ERUs, the plan indicates a "build-out" population of 15,192/17,941 ERUs.
- Based on system design standard of an ADD of 300 gpd/ERUs, and a horizon year estimate of 1,540 ERUs.
- Based on analysis of system design in terms of ADD/ERU compared to projected number of ERUs in WSP.
- Latest WSP does not identify a horizon year ADD.
- Water District 2 August 2009 Draft Water System Plan does not identify population. The plan indicates that the district plans to serve a total of 1,175 ERUs, or 797 service connections (Whatcom County Water District 2 Draft Water System Plan, August 4, 2009, Tables 2-9 and 2-10). Applying the City of Bellingham average household size of 2.5 and occupancy rate of 94.4% to the 797 projected water connections results in a future population of 1,881 in 2029.
- Lake Whatcom Water and Sewer District, Water System Comprehensive Plan (August 2009). See Appendix B for forecast to 2027. Also, there is a build-out forecast of 1.2 MGD.

Amend Table 4.10-32 found on page 4.10-54 of the Draft EIS to incorporate updated information provided by various water service providers. (Section 4.10.5, *Water Systems*).

Table 4.10-32. Level of Service Standards

Service Provider	LOS Standard (Average Daily Demand)
City of Bellingham	199 gallons/ day /ERU/ day (2)
Water District 2	210 246 gallons/day/ERU (4)
Water District 7	221 gallons/day/ERU
Lake Whatcom Water & Sewer (formerly Water District 10)	219 449 gallons/ capita /day/ERU (5)(4)
City of Blaine	300 gallons/household/day
Birch Bay Water and Sewer District	140 gallons/capita/day (1)
Evergreen Water and Sewer	270 gallons/household/day
Whatcom County Water District 13	270 gallons/household/day
City of Everson	300 gallons/ERU/day
City of Ferndale	140 gallons/capita/day (1)
PUD 1	140 gallons/capita/day (1)
City of Lynden	235 gallons/day/ERU
City of Nooksack	250 gallons/day/ERU 440 gallons/capita/day (34)
City of Sumas	225 gallons/day/residential connection

- 1 Where an LOS standard was not specifically identified in a water system plan, the average daily water consumption figure for urban water systems was taken from the CWSP, Table 3-4, page 3-5 (February 2000).
- 2 Draft City of Bellingham WSP, Table 2-11 (November 2008).
- 3 [Personal communication \(Email\) from Erin Osborn to Matt Aamot, July 14, 2009.](#)
- 4 [Whatcom County Water District #2, Draft Water System Plan, August 4, 2009, page 2-5.](#)
- 5 [Lake Whatcom Water and Sewer District Water System Comprehensive Plan \(August 2009\). Based on water demand forecast for the combined Geneva/Sudden Valley portion of the district \(Appendix B of Water System Plan\).](#)

Amend Table 4.10-32 found on page 4.10-55 of the Draft EIS to incorporate updated information provided by various water service providers. (Section 4.10.5, *Water Systems*).

Table 4.10-32. Urban Water Level of Service Requirements Analysis for 2031

Service Provider	2008 ADD (mgd)	2031 No Action Current Comp Plan Alternative	2031 No Action Trends Alternative	2031 Action Alternative X	2031 Action Alternative Y
		mgd (based on per capita LOS gpd)			
Birch Bay Water/ Sewer	0.98	1.37	1.3	1.33	1.66
City of Bellingham	11.5	15.61	16.74	17.73	15.89
City of Blaine	1.87	1.92	2.06	2.28	2.39
City of Everson	0.37	0.99	0.89	1.19	1.25

Service Provider	2008 ADD (mgd)	2031 No Action Current Comp Plan Alternative	2031 No Action Trends Alternative	2031 Action Alternative X	2031 Action Alternative Y
		mgd (based on per capita LOS gpd)			
City of Ferndale	1.13	2.1	2.1	2.34	2.44
City of Lynden (1)	1.99	3.5	3.77	4.08	3.98
City of Nooksack	0.0844 ⁽⁴⁾	0.24	0.23	0.3	0.32
City of Sumas	0.29 ⁽²⁾	0.38	0.4	0.45	0.46
Evergreen Water and Sewer	0.83 ⁽²⁾	1.02	1.29	0.99	1.25
PUD 1	N/A	N/A	N/A	N/A	N/A
Lake Whatcom Water And Sewer (W.C. Water Dist. 10)	1.520.81 ⁽⁵⁾	1.57	1.62	1.59	1.60
Water District 2	0.12 ⁽³⁾	0.13 ⁽³⁾	0.15 ⁽³⁾	0.14 ⁽³⁾	0.13 ⁽³⁾
Water District 13	0.11	0.36	0.83	0.38	0.66
Water District 7	0.14 ⁽³⁾	0.2 ⁽³⁾	0.26 ⁽³⁾	0.21 ⁽³⁾	0.22 ⁽³⁾

N/A = not available; gpm = gallons per minute

- 1 The City of Lynden and the Department of Ecology have a 2004 Memorandum of Agreement in which the two parties officially “agree to disagree” on the number of water rights held by City of Lynden while they work towards a long-term solution on the city’s water needs. Where the City of Lynden indicates that it has 5.91 million gallons per day (mgd) in water rights, Ecology indicates that it believes that the city only has approximately 1.599 (mgd) in water rights (Personal correspondence, March 17, 2009 letter from Paul Fabiniak, Ecology to Richard Rodriguez, DOH).
- 2 Where data is shown, it is estimated using 2008 population multiplied by the LOS rate noted above.
- 3 Estimates are based on a calculation using households rather than population based upon information contained in WSP.
- 4 Estimate based on calculation provided in personal email communication, Erin Osborn to Matt Aamot, July 14, 2009.
- 5 Estimate based on 2008 ERU’s found in Table 4.10-29 multiplied by the LOS rate noted above.

Amend text under the Birch Bay Water and Sewer Plan subheading on pages 4.10-55 through 4.10-56 of the Draft EIS to incorporate updated information provided by the district. (Section 4.10.5, *Water Systems*).

Birch Bay Water and Sewer

The district’s Comprehensive Water Plan (2009⁷) indicates that existing water supply is only sufficient through 2011.2008 The district’s plan states that additional water supply, including use of surplus storage and/or conservation will be necessary to meet the demand beyond that time. The district’s 2009⁷ Comprehensive Water Plan includes several new supply and distribution projects expected to address supply deficiencies. The district plan’s 2035² population projection of 12,91313,237 is greater than the population projections considered for the district’s water service area under all 2031 planning alternatives. Birch Bay’s Comprehensive Water Plan

indicates that it will extend future service areas to areas within the district boundaries and provides future connection policies. However, it does not provide a map identifying future major service lines.

Amend text in first paragraph found on page 4.10-58 of the Draft EIS describing City of Lynden Water System Plan to provide clarification. (Section 4.10.5, *Water Systems*).

City of Lynden

The City of Lynden WSP (Gray & Osborne 2008) indicates that the city has adequate water supply to meet the needs of population growth over the 20-year period. However, the City of Lynden and Ecology have an existing dispute over the city's water rights. Where the City of Lynden indicates that it has 5.91 million gallons per day (mgd) in water rights, Ecology indicates that it believes that the city only has approximately 1.599 mgd in water rights (Fabiniak and Rodriguez pers. comm.). The city has entered into a memorandum of agreement (MOA) Ecology to address long-standing water right issues between the city and Ecology. Resolution of water supply issues for City of Lynden is important for future planning in the city's water service area. Using water rights amounts that Ecology believes the city has it is expected that the city will experience water supply deficits based on the Whatcom 2031 future population projections under all alternatives calculations.

Amend text in second paragraph found on page 4.10-60 of the Draft EIS to incorporate recent update of Lake Whatcom Water and Sewer District's water system plan. (Section 4.10.5, *Water Systems*).

Lake Whatcom Water and Sewer District (Water District 10)

The Lake Whatcom County Water and Sewer District 10-Water System Comprehensive Plan (2009) ~~indicates that the district has adequate supply to meet its 20-year planning needs does not identify any water supply capacity issues within the planning period.~~ The district takes water supply and provides service to four separate areas: Sudden Valley, Geneva, North Shore/City, and North Shore/Wells. A review of population projections found in Table 4.10-31 indicates that the district is planning for less growth by ~~2020~~ 2027 than indicated under all alternatives being considered to 2031 under the Whatcom 2031 Comprehensive Plan update. However, the district's build-out plans are for a population of 15,192, which is larger than any of the 2031 population projections for the district provide a more comparable number when compared to 2031 projections.

Amend text in the fourth paragraph found on page 4.10-60 of the Draft EIS to incorporate a recent update of district's water system plan. (Section 4.10.5, *Water Systems*).

Water District 2

Water District 2's ~~Draft~~ WSP (~~2009~~2003) includes plans to serve ~~approximately 797 connections by 2029. When translating this to population, the district is planning for a population that is slightly larger a larger district population by the plan's horizon year than any of the four~~ Whatcom 2031 alternatives. The district's plan identifies capital improvements needed by the district over the 20-year period ending in ~~2029~~2023. These improvements include the ~~systematic replacement of the district's water distribution system over the 20-year period which in many cases will address fire flow issues~~ ~~construction of an additional intertie with the City of Bellingham, installation of new fire hydrants, water mains, and construction of a new district office.~~ ~~Additional projects necessary to provide fire flow in the Bellingham UGA have also been identified and are likely to be paid for by developers.~~ The plan indicates that the district has enough water supply for its planning period. The district's plan does not ~~specifically~~ identify future ~~water service lines within the district~~ ~~service connections~~. Water District 2 and City of Bellingham have an overlap in service areas south of the Bellingham Airport according to the County's CWSP.

Amend text in the last full paragraph found under Impacts Common to All Alternatives on page 4.10-61 of the Draft EIS to incorporate PUD-3 comment. (Section 4.10.5, *Water Systems*).

A number of the water systems in the County have a range of deficiencies ~~that may compromise the ability of a developer to meet when meeting~~ the requirements of the County Fire Code. See Section 4.10.2 regarding fire services and the purpose of fire flow. Under any of the alternatives, these deficiencies could increase if mitigation is not implemented.

Amend text in second full paragraph under No Action Current Comprehensive Plan found on page 4.10-62 of the Draft EIS to incorporate PUD-4 comment. (Section 4.10.5, *Water Systems*).

Water distribution and fire flow requirements must also be met by water providers ~~contractually or otherwise legally obligated to provide them~~ under the No Action Current Comprehensive Plan Alternative. Each water service provider includes a listing of planned capital improvements for their water distribution, storage, and fire flow requirements. Most plans detail these upgrades to a 6-year planning period.

Amend text in second paragraph under No Action Trends Alternative found on page 4.10-63 of the Draft EIS to incorporate PUD-4 comment. (Section 4.10.5, *Water Systems*).

Water distribution and fire flow requirements must also be met by water providers contractually or otherwise legally obligated to provide them under the No Action alternatives. Under the No Action Trends Alternative, new development would be more spread out over a larger area than under any of the other alternatives, making extension of water service lines less cost effective as lines are extended to serve fewer people per water line mile than in other alternatives. Each water service provider includes a listing of planned capital improvements for their water distribution, storage, and fire flow requirements. Most plans detail these upgrades to a 6-year planning period.

Amend second bullet under Applicable Regulations and Commitments portion of Mitigation Measures on page 4.10-65 of the Draft EIS to incorporate PUD-5 comment. (Section 4.10.5, *Water Systems*).

- Water supply facilities, to the extent they are contractually or otherwise obligated to provide fire flows for new development and public water system expansions, must be designed to meet, at a minimum, the fire flow levels specified in WAC 246-293-640, the International Fire Code, and WCC Title 15. In addition, utilities must develop their capital improvement program for meeting these fire flow objectives in consultation with the appropriate local fire authorities.

Amend fist bullet under Other Potential Mitigation Measures portion of Mitigation Measures on page 4.10-65 of the Draft EIS to provide clarification and incorporate PUD-6 comment. (Section 4.10.5, *Water Systems*).

- Water systems providing fire flows should increase the size of piping, install additional looping to increase water pressure for fire flow, and/or increase frequency of hydrant placement to meet fire flow requirements.

Amend Table 4.10-34, Sanitary Sewer Inventory, on pages 4.10-68 through 4.10-70 of the Draft EIS to incorporate updates to sewer system plans. (Section 4.10.6, *Wastewater*).

Table 4.10-34. Sanitary Sewer Inventory

System Name	Collection System		Treatment Plant			Service Area		Notes
	Miles of Pipe	Collection System Existing Conditions	Existing Flow (mgd)	Design Flow (mgd) ⁽¹⁾	Surplus / Deficit (mgd)	2008 Population Served ⁽²⁾	Existing Connections (ERU)	
City of Bellingham	324	The city operates and maintains approximately 324 miles of mains and force mains. The system includes 27 pump stations and associated force mains, and one Combined Sewer Overflow (CSO) structure. Modeling indicates that portions of the interceptor downstream from Oak Street are close to capacity at 60 mgd . The system needs improvements to collection system to limit CSO events to the allowable frequency and volume. Long Term Simulation modeling shows needs for additional 10 mgd conveyance and treatment capacity, or 1.7 MG of storage to limit CSOs to 1 event per year in 2026. Additional collection system improvements are required to maintain CSO volumes at current "baseline" levels.	12.5	20	7.5	83,000 ⁽²⁾ 86,990	26,100	
Lake Whatcom Water & Sewer District	82.18	District has completed several improvement projects including Lake Louise Rd Interceptor and Sudden Valley Sewage Detention Basin. District also has an ongoing program to upgrade aging sewer lift stations. District is also working to decrease potential build-out density within the district boundaries which allowed district to decommission Clematis Pump Station.	0.75	4.6	3.85	10,690 ⁽²⁾ 97	3,729	Relies on City of Bellingham WWTP. Flow is restricted by contract with city to 3,200 gpm (4.6 mgd).

System Name	Collection System		Treatment Plant			Service Area		Notes
	Miles of Pipe	Collection System Existing Conditions	Existing Flow (mgd)	Design Flow (mgd) ⁽¹⁾	Surplus / Deficit (mgd)	2008 Population Served ⁽²⁾	Existing Connections (ERU)	
City of Blaine	40	The existing service area for the Blaine sewage treatment system is the Blaine city Limits. The City of Blaine wastewater collection system consists of gravity sewers, force mains and eight pumping stations. The collection system is divided into two primary areas which are separated by Drayton Harbor. The Semiahmoo portion of the service consists of the Resort Semiahmoo. Effluent from Central Blaine is collected at Pump Station 1 on Marine Drive, where it is pumped through a submerged pipeline under the entrance to Drayton Harbor to the sewage treatment plant. The city invests in reducing I&I in the collection system as well as investing in additional off-line storage for peak rain events.	0.496	0.8	0.304	4,780 0	2,391	
Birch Bay Sewer System Plan	52	District operates 11 pumps, 7 of which follow the beach line. The district monitors its I/I in the collection system.	0.901	1.28	0.379	5,970 0	6,658 ⁽⁴⁾ N/A	
City of Everson	8.52 A	Consists of 9 pump stations in City of Everson (in addition, 4 pump stations are located in Nooksack to serve that population). Rehabilitation of manholes occurred in mid-1990s and study of I&I finds that it does not exceed EPA standards.	0.270	0.44	0.170	2,380 0	716 A	

System Name	Collection System		Treatment Plant			Service Area		Notes
	Miles of Pipe	Collection System Existing Conditions	Existing Flow (mgd)	Design Flow (mgd) ⁽¹⁾	Surplus / Deficit (mgd)	2008 Population Served ⁽²⁾	Existing Connections (ERU)	
City of Ferndale	42.6	The sewer collection system uses 16 pump stations. All gravity mains entering Downtown Ferndale could exceed capacity during peak periods by sewer plan horizon of 2015. Two pumps are also considered inadequate to meet peak flow demand. Sewer service must be extended to areas currently not served.	1.5	3.23	1.73	13,130,400 800	N/A	
City of Lynden	37	Collection system includes 14 operating pump stations. Three existing pump stations and some associated force mains and piping were identified as having inadequate capacity for projections to 2024. In addition sewer extensions will be needed to service new development.	1.31	2.18	0.87	11,610,413 350	4,440 ⁽⁵⁾ N/A	
City of Nooksack	6.89	Wastewater collection system has sufficient capacity for future flows. The city anticipates extension of existing collection system to serve new development. Areas within the city limits. The city requires annexation of unincorporated areas of the UGA prior to service.	<u>0.075</u>	See Notes	N/A	1,140,400 0	250 A	Relies on City of Everson WWTP. Flow restricted to 154,000 gpd (0.154 mgd).
City of Sumas	10	Collection system will be extended to serve new development within city jurisdiction. New extensions to portions of the city that require crossing natural barriers of Bone Creek and Sumas River are anticipated to be more expensive capital projects. The city requires annexation of unincorporated areas of the UGA prior to service.	0.2325	See Notes	N/A	1,280,426 4	900 A	Relies on WWTP in Abbotsford, BC. Contract limits to 339,500 gpd in 2008, increasing to maximum 400,000 gpd by 2019.

System Name	Collection System		Treatment Plant			Service Area		Notes
	Miles of Pipe	Collection System Existing Conditions	Existing Flow (mgd)	Design Flow (mgd) ⁽¹⁾	Surplus / Deficit (mgd)	2008 Population Served ⁽²⁾	Existing Connections (ERU)	
W.C. Water District 13 Sewer	4.1	Collection system consists of 8- to 12-inch interceptor pipe, and 8-inch collector pipe. All pipes are constructed of PVC. Interceptor and collector pipe gravity drains to one pump station which is then pumped through 1,800 feet of 4-inch force main pipe to treatment systems comminutor and the treatment plant.	0.05 ⁶ A	0.125	0.075 A	900-1,000 A	379 ⁽³⁾	

mgd = million gallons per day, gpd = gallons per day, I/I = inflow and infiltration, CSO = combined sewer overflow, WWTP = wastewater treatment plant

1 Based on the average day flow during peak flow month as reported on National Pollutant Discharge Elimination System (NPDES) permit.

2 ~~2008 Population provided by Berk & Associates estimates. Population taken from System Plan rather than OFM 2008 data or other 2008 source.~~

3 Source is from Foothills Subarea Plan Final Supplemental Environmental Impact Statement (December 2008)

4 Birch Bay uses "Equivalent Living Units". Information is from May 2009 Birch Bay Comprehensive Sewer Plan (see page 5-2). Information is from December 2008.

5 2007 data. Assuming 2.5 persons per ERU (Personal communication, Tammy Adams, Wastewater Plant Manager and Dean Martin, July 10, 2009).

6 Personal communication: Rodney Langer email to Matt Aamot on 6/24/09 forwarding Kelly Wynn email.

Source: Unless otherwise noted source comes from Department of Ecology NPDES Permit data (accessed via Internet February 5, 2009); review of latest sewer system plan; and Berk & Associates, State OFM for 2008 population.

Amend Table 4.10-35 Level of Service Standards on page 4.10-71 of the Draft EIS to incorporate updated information on the City of Nooksack’s sewer LOS provided by Sehome Planning. (Section 4.10.6, *Wastewater*).

Table 4.10-35. Level of Service Standards

Service Provider	LOS Standard
City of Bellingham	102 gallons/capita/day ⁽¹⁾
Birch Bay Water and Sewer District	85 gallons/capita/day
City of Blaine	300 gallons/household/day
City of Everson	300 gallons/household/day
City of Ferndale	164 gallons/capita/day ⁽²⁾
Lake Whatcom Water & Sewer (formerly Water District 10)	198 gallons/day/connection ⁽³⁾
City of Lynden	100.7 gallons/capita/day ⁽⁴⁾
City of Nooksack	250-275 300 gallons/household/day ⁽⁵⁾
City of Sumas	300 gallons/household/day ⁽⁵⁾
Whatcom County Water District 13	217 gallons/household/day ⁽⁶⁾

1 Section 4.3.2 Per capita flows, page 4-6, City of Bellingham Comprehensive Sewer Plan, August 2008.

2 Ferndale Comprehensive Wastewater Facility Plan, Section 4.2.1, page 4-1, February 1996.

3 Lake Whatcom Water and Sewer District Comprehensive Sewer Plan, page 8, September 2007.

4 City of Lynden General Sewer Plan, page 4-1, December 2007.

5 ~~Personal communication from Erin Osborn to Matt Aamot, Email July 14, 2009, citing communication with Rollin Harper of Sehome Planning. Cities of Nooksack and Sumas did not identify a LOS standard in their capital facility plans. Therefore, the LOS standard of a nearby community, City of Everson was utilized for analysis purposes.~~

6 Source of this LOS is the Whatcom County Foothills Subarea Plan Final Environmental Impact Statement, December 19, 2008, page 89.

Source = Unless otherwise noted, source of information is city comprehensive plan or individual sewer system plan LOS statement.

Amend Table 4.10-36 Sewer Level of Service Analysis for 2015 on page 4.10-72 of the Draft EIS to incorporate updated information on the City of Nooksack’s sewer LOS provided by Sehome Planning. (Section 4.10.6, *Wastewater*).

Table 4.10-36. Sewer Level of Service Requirements Analysis for 2015

Service Provider	Treatment Capacity (mgd)	2015 No Action Current Comp Plan Alternative	2015 No Action Trends Alternative	2015 Action Alternative X	2015 Action Alternative Y
	Treatment Capacity Surplus (Deficit)				
Bellingham	20.00	10.43	10.20	10.00	10.40
Birch Bay Water & Sewer	1.28	0.68	0.70	0.69	0.63
Blaine	0.80	0.15	0.13	0.11	0.09

Service Provider	Treatment Capacity (mgd)	2015 No Action Current Comp Plan Alternative	2015 No Action Trends Alternative	2015 Action Alternative X	2015 Action Alternative Y
Treatment Capacity Surplus (Deficit)					
Everson ⁽²⁾	0.29	0.00	0.01	(0.02)	(0.03)
Ferndale	3.23	0.84	0.81	0.69	0.64
Lynden	2.18	0.87	0.84	0.78	0.75
Nooksack ⁽¹⁾	0.15	0.040-02	0.040-03	0.020-04	0.020-04
Sumas ⁽⁴⁾	0.39	0.23	0.23	0.22	0.22
WC Water District 10	4.60	3.82	3.81	3.82	3.82
WC Water District 13	0.13	See ⁽³⁾	See ⁽³⁾	See ⁽³⁾	See ⁽³⁾

- [This analysis uses 275 gallons/household/day as an LOS measure, the upper end of the range provided by the City of Nooksack in communication with Erin Osborn, as communicated in email to Matt Aamot, July 14, 2009. Calculations for cities of Nooksack and Sumas are based upon assumed LOS standards as noted in LOS standard table above.](#)
- Everson's Treatment Plan has a total capacity of 0.44 mgd. However, 2/3 of capacity, or 0.29 mgd are owned by Everson, while 1/3 of capacity or approximately 0.15 mgd is owned by neighboring Nooksack.
- A more detailed analysis of wastewater utility service to the Columbia Valley UGA was provided in the Foothills Subarea Plan Final Supplemental Environmental Impact Statement (SEIS) (December 2008, pages 83-89). Please see discussion related to Water District 13 below for more detail on ability to serve the Columbia UGA with sewer service in 2031.

Amend Table 4.10-37 Level of Services Standards on pages 4.10-73 and 4.10-74 of the Draft EIS to incorporate updated information on the City of Nooksack's sewer LOS provided by Sehome Planning. (Section 4.10.6, *Wastewater*).

Table 4.10-37. Sewer Level of Service Requirements Analysis for 2031

Service Provider	Treatment Capacity (mgd)	2031 No Action Comprehensive Plan Alternative	2031 No Action Trends Alternative	2031 Action Alternative X	2031 Action Alternative Y
Treatment Capacity Surplus (Deficit)					
Bellingham	20.00	8.85	8.09	7.41	8.73
Birch Bay Water & Sewer	1.28	0.47	0.53	0.49	0.30
Blaine ⁽³⁾	0.80	0.00	(0.06)	(0.13)	(0.20)
Everson ⁽²⁾	0.29	(0.08)	(0.04)	(0.14)	(0.16)
Ferndale	3.23	0.29	0.19	(0.20)	(0.35)
Lynden	2.18	0.54	0.46	0.24	0.15
Nooksack ⁽¹⁾	0.15	(0.003)(0-02)	0.00(0-04)	(0.04)(0-06)	(0.05)(0-07)

Service Provider	Treatment Capacity (mgd)	2031 No Action Comprehensive Plan Alternative	2031 No Action Trends Alternative	2031 Action Alternative X	2031 Action Alternative Y
Treatment Capacity Surplus (Deficit)					
Sumas (4)	0.39	0.20	0.19	0.17	0.16
Lake Whatcom Water & Sewer District (formerly WC Water District 10)	4.60	3.80	3.78	3.79	3.79
WC Water District 13	0.13	See (4)	See (4)	See (4)	See (4)

- 1 [This analysis uses 275 gallons/household/day as a LOS measure, the upper end of the range provided by the City of Nooksack in communication with Erin Osborn, as communicated in email to Matt Aamot, July 14, 2009. Calculations for cities of Nooksack and Sumas are based upon assumed LOS standards as noted in LOS standard table above.](#)
- 2 Everson's Treatment Plan has a total capacity of 0.44 mgd. However, 2/3 of capacity, or 0.29 mgd, are owned by Everson, while 1/3 of capacity or approximately 0.15 mgd is owned by neighboring Nooksack.
- 3 City of Blaine anticipates opening a new wastewater treatment plant in 2010 which will increase treatment capacity to 1.5 mgd.
- 4 A more detailed analysis of wastewater utility service to the Columbia Valley UGA was provided in the Foothills Subarea Plan Final Supplemental Environmental Impact Statement (SEIS) (December 2008, pages 83-89). Please see discussion related to Water District 13 above and below for more detail on ability to serve the Columbia UGA with sewer service in 2031.

Amend first paragraph on page 4.10-74 of the Draft EIS to provide clarification related to Bellingham sewer system. (Section 4.10.6, *Wastewater*).

City of Bellingham

The City of Bellingham maintains and operates a wastewater collection and treatment system that provides existing service to the city limits as well as sewer service zones within the Bellingham UGA. The existing sewer network is most dense in the central city, and there appear to be portions of the city, particularly in the south that are not yet served by sewer. There are also less extensive sewer networks extending into the city's UGA. The city has established a potential future sewer service area that extends beyond the city limits and encompasses the entire city's UGA not currently served by Lake Whatcom Water and Sewer District (formerly Water District 10). The city's current Comprehensive Sewer Plan (Carollo Engineers 2008) indicates that the city's long-range sewer system plans [accounts for sewage treatment capacity forextend to](#) approximately 122,007 people by 2026 ([Carollo Engineers 2008](#)). This is a larger population than [projectedestimated](#) under three of the four [2031](#) alternatives' [2031 population](#) (Action Alternative X provides approximately 123,430 people in the sewer service area by 2031). The city's sewer service area and population forecast excludes Lake Whatcom Water and Sewer District.

Amend the last paragraph on page 4.10-74 (extending to top of page 4.10-75) of the Draft EIS to incorporate the Birch Bay Water and Sewer District's updated comprehensive sewer plan. (Section 4.10.6, *Wastewater*).

Birch Bay Water and Sewer

Birch Bay Water and Sewer District adopted a Comprehensive Sewer Plan in ~~2009~~1999 and updated the plan several time over the years, with the most recent update in 2005. The district's plan indicates where current sewer service exists and establishes a future service area that consists of areas of portions of the Birch Bay, Blaine, and Cherry Point UGAs. The plan does not appear to identify future service lines. A review of a GIS layer of existing sewer lines indicates that sewer is concentrated along the coast of the Birch Bay UGA, though there are less extensive networks of sewer lines inland in the Birch Bay UGA and the southeast corner of the Blaine UGA. The sewer district's ~~1999~~2009 plan had ~~higher~~lower population ~~projections in the 2029 horizon years~~estimates for the district than anticipated in ~~all but one~~any of the alternatives being considered to 2031 (*Alternative Y*). ~~The 2009 Sewer Plan indicates that the district will exceed existing capacity by 2019. However, with the wastewater treatment plant upgrade projects noted in the 2009 Comprehensive Sewer Plan, the district will be able to accommodate the growth anticipated to 2029. However, the district's sewage treatment plant, with a capacity to treat over 1 million gpd is able to accommodate the additional population growth anticipated in the plan period. In addition, the district's plan includes improvements to the treatment plant that are anticipated to increase capacity to 1.94 mgd by 2020~~ (Birch Bay Water and Sewer District and CHS Engineers ~~2009~~1999).

Amend first full paragraph on page 4.10-75 of the Draft EIS to incorporate information provided by the City of Blaine on its sewer system. (Section 4.10.6, *Wastewater*).

City of Blaine

~~The 2004~~ The City of Blaine General Sewer Plan and its 2005 update Comprehensive Plan shows major ~~does not detail~~ existing ~~or future~~ sewer service lines and some future sewer trunk lines. The City of Blaine Comprehensive Plan ~~However, it does~~ includes a map showing future sewer service area as portions of the Blaine and Birch Bay UGAs not served by Birch Bay Water and Sewer District. A GIS layer showing existing sewer lines indicates that large areas of the city east of I-5 are not served by sewer or close to sewer trunk lines. Table 4.10-37 above indicates that the City of Blaine reaches a sewage treatment deficit by 2031 using existing treatment capacity. The city is at capacity under the No Action Current Comprehensive Plan Alternative, and has a deficit under the No Action Trends Alternative, Action Alternative X, and Action Alternative Y. The

largest deficit occurs under Action Alternative Y. However, the 2005 General Sewer Plan and City of Blaine 2006 Comprehensive Plan both indicates that the city has plans to upgrade and expand sewage treatment plant capacity to meet future demands for service, Ecology National Pollutant Discharge Elimination System (NPDES) requirements, and to replace aging infrastructure. The city plans to complete construction on its new wastewater treatment plant and begin operation in 2010 (City of Blaine 2009). The new wastewater treatment plant's design capacity of 1.5 mgd would accommodate projected wastewater flows to the end of the 2031 planning period. Another major component of the city's capital improvement plan is a program for reduction of inflow and infiltration (I&I).

Amend the first full paragraph on page 4.10-76 of the Draft EIS to incorporate updated information provided on the City of Everson sewer system. (Section 4.10.6, *Wastewater*).

~~As described above,~~ The city may participate in constructing a new east-west connector to serve the city's industrial zone and would need to access Community Economic Revitalization Board (CERB) and Economic Development Initiative (EDI) funding at that time. The city also has planned to extend the sewer system to serve the residential area along Mission Road as part of the Mission Road Phase 3 project. The Everson Comprehensive Plan shows the locations of some but not all of the system extensions necessary to serve new development in the Everson UGA. The city has identified the creation of a comprehensive sewer plan as a key project in the city's future plans for sewers (Osborn pers. comm.)

Amend the first full paragraph on page 4.10-77 of the Draft EIS to incorporate updated information provided on the City of Nooksack sewer system. (Section 4.10.6, *Wastewater*).

City of Nooksack

The City of Nooksack does not have a sewer comprehensive plan. The Nooksack sewer system was addressed in the 2004 update of the Nooksack comprehensive plan in the Capital Facilities Element. The city has identified creation of a comprehensive sewer plan in conjunction with the City of Everson comprehensive sewer plan project as a key project in the city's future plans for sewers (Osborn pers. comm.)

Amend text in the second full paragraph from the bottom of page 4.10-77 of the Draft EIS to incorporate updated information provided on the City of Sumas sewer system. (Section 4.10.6, *Wastewater*).

The city has an ongoing contract with the City of Abbotsford to receive and treat sewage collected in Sumas. ~~This recently extended~~ contract provides

for the receipt and treatment of a maximum volume of 400,000 gpd through December 31, 2028. Discharges from the Sumas system are metered on a daily basis. A review of city records from February 2009 indicates that typical maximum effluent levels are approximately 270,000 gpd. The city estimates that the total contract amount equates to 1,333 ERUs. Action Alternative Y (the highest growth alternative), which includes a population increase from 1,279 to 2,072 along with a comparable level of employment, represents a 62% increase through 2031. On this basis it appears that Sumas has sufficient sewer service capacity to meet its needs through 2031.

Amend first text in third paragraph on page 4.10-78 of the Draft EIS to provide clarification on source of information for Water District 13 sewer information. (Section 4.10.6, *Wastewater*).

Water District 13

Water District 13, serving the Columbia Valley UGA, is expected to experience a sewage treatment deficit in 2031 under all alternatives based upon information provided in the Foothills Subarea Plan Final SEIS, December 2008 (pages 83-89). Water District 13 has the existing capacity for an additional 197 sewer service connections. Based upon projected increases in the number of households by 2031, Water District 13 will experience a sewer capacity deficit. The water district is currently updating its Comprehensive Sewer Plan. It is expected that Water District 13 will need to address expected sewage capacity issues in 2031 Action Alternative Y under all alternatives. Evergreen Water and Sewer District, which provides water service to a portion of the Columbia Valley UGA currently does not provide sewer service. As noted in the ~~Whateom County Draft~~ Foothills Subarea Plan (October 2007, page 116), in the future Water District 13 may contract with its neighboring water district to provide sewer service to the portion of the Columbia Valley UGA served by Evergreen Water and Sewer District 19.

Amend text in last paragraph on page 4.10-80 of the Draft EIS related to No Action Trends Alternative to incorporate updated information on various sewer systems. (Section 4.10.6, *Wastewater*).

As described in the 2031 LOS analysis above, the ~~City~~ities of Everson ~~and Nooksack are~~is expected to experience treatment capacity deficits under both No Action alternatives in 2031, while the City of Nooksack is at capacity under the No Action Trends Alternative. The cities' analysis of sewage impacts focused on the highest growth scenario (Action Alternative Y), but as Table 4.10-37 indicates, ~~they~~the City of Everson is ~~are~~ likely to experience a deficit and the City of Nooksack will be at capacity under the No Action Trends Alternative as well. These cities share a sewage treatment plant

located within the City of Everson. The City of Blaine is at sewage treatment capacity under the 2031 No Action Current Comprehensive Plan Alternative and experiences a deficit under the No Action Trends Alternative. However, these capacity numbers do not account for the City of Blaine’s near-term plans to upgrade its sewage treatment plant. The Birch Bay Water and Sewer District experiences its largest net reserve of sewage treatment capacity under the No Action Trends Alternative. The Columbia Valley UGA will experience a sewer service deficit under the 2031 No Action Trends Alternative based upon existing capacity.

Amend text in last paragraph on page 4.10-89 (extending onto top of page 4.10-90) and Table 4.10-40 found on pages 4.10-90 through 4.10-91 of the Draft EIS to provide updated solid waste system inventory information provided by the County’s Solid Waste program. (Section 4.10.7, *Solid Waste*).

The County relies upon privately operated disposal facilities for solid waste disposal service. Because of the absence of any County landfill, privately owned disposal facilities will continue to find it necessary to export waste. These facilities include two transfer stations and five drop-off sites, which are shown in Table 4.10-40 below. Certified solid waste haulers in the County are Sanitary Service Company (SSC), Blaine Bay Refuse, ~~and Nooksack Valley Disposal (NVD)~~, ~~and Point Recycling and Refuse (Lemperes pers. comm.)~~. There are numerous recycling collection sites located throughout the County. See Table 4.10-40 below for a current inventory of solid waste facilities in the County.

Table 4.10-40. Solid Waste Facility Inventory

Name	Owner	Operator	Location
Hazardous Waste Disposal			
Disposal of Toxics	Whatcom County	Whatcom County	3505 Airport Drive
Transfer Stations			
Regional Disposal Company/Recomp	Regional Disposal Company-Sanitary Service Company	Regional Disposal Company/Sanitary Service Company	1524 Slater Rd, Ferndale N/A
Recycling & Disposal Svcs (RDS)	RDS/Sanitary Service Company	RDS/Sanitary Service Company	4916 LaBounty Place, Ferndale N/A
Solid Waste Drop-Sites			
Birch Bay	Whatcom County (lease to Sanitary Service Company)	Sanitary Service Company	4297 Birch Bay-Lynden Rd, Blaine N/A

Name	Owner	Operator	Location
Cedarville	Whatcom County (lease to Sanitary Service Company) Sanitary Service Company	Sanitary Service Company	Cedarville Rd off of Mt Baker Highway, Everson N/A
Sanitary Service Company (SSC)	Sanitary Service Company	Sanitary Service Company	1001 Roeder Ave., Bellingham N/A
Nooksack Valley Disposal	Nooksack Valley Disposal	Nooksack Valley Disposal	250 Birch Bay- Lynden Rd, Lynden N/A
Point Recycling and Refuse (PRR)	Whatcom County (lease to Point Recycling and Refuse)	Point Recycling and Refuse	Off Johnson Road, Pt Roberts N/A
Recycling Drop-Off Locations			
Alrite Recycling Center	N/A	N/A	1900 Racine
Birch Bay Recycling	N/A	N/A	4297 Birch Bay- Lynden Rd.
Cedarville Recycling	N/A	N/A	Cedarville Road (off Mt. Baker Highway)
City Organics	N/A	N/A	Bellingham
"Clean Green" Facility	N/A	N/A	North of Lakeway Dr. on Woburn
Disposal of Toxics Facility	N/A	N/A	3505 Airport Drive
Green Earth Technology	N/A	N/A	774 Meadowlark Rd, Lynden
Jiffy Lube	N/A	N/A	Multiple locations
Jim's Automotive Experts	N/A	N/A	102 E. Main, Everson
Lynden Christian Paper Depot	N/A	N/A	503 Drayton, Lynden
Master Lube	N/A	N/A	111 E. Maple
Nooksack Valley Disposal	N/A	N/A	250 Birch Bay- Lynden Rd.
Northwest Recycling	N/A	N/A	1419 C. Street
Northwest Recycling Warehouse	N/A	N/A	1515 Kentucky Street
Point Recycling and Refuse	N/A	N/A	Off Johnson Rd., Point Roberts
Recycling and Disposal Services	N/A	N/A	4916 LaBounty Place
Regional Disposal Co.	N/A	N/A	1524 Slater Road
Relectronics	N/A	N/A	1000 C Street

Name	Owner	Operator	Location
Safe and Easy Recycling	N/A	N/A	2001 Iowa Street, Ste. F
Sanitary Service Company	N/A	N/A	1001 Roeder Avenue
Schuck's Automotive	N/A	N/A	Multiple locations
Z Recyclers	N/A	N/A	6129 Guide Meridian

N/A = not available

Sources: Whatcom County Solid Waste Plan (2007), ~~and~~ Internet review of Whatcom County Public Works Solid Waste Division website information on location of disposal and recycling sites (accessed February 6, 2009) [and personal communication from Penni Lemperes to Matt Aamot, July 28, 2009 and August 12, 2009.](#)

4.5. Draft EIS Chapter 5 References

Page 5-3 of the Draft EIS, third reference on page, correct spelling as follows:

Burdge, Rabel J. 2009. Update on Population Estimates for Whatcom County, 2000-2008, Projections for 2007-2022; 2008-2030. Presented to Planning Commission at meeting. February 19.

Page 5-16 of the Draft EIS, third reference under section 5.2, correct spelling as follows:

Burdge, Rabel. Professor. Western Washington University and Whatcom County Planning Commissioner. March 31, 2009—Email to David Stalheim, Director of Whatcom County Planning and Development Services.