

**PDS\_Planning\_Commission - attn: Becky Boxx**

**From:** "Lin McJunkin" <mcjunkin@wavecable.com>  
**To:** <PDS\_Planning\_Commission@co.whatcom.wa.us>  
**Date:** 12/7/2011 9:07 AM  
**Subject:** attn: Becky Boxx

please forward my previous comments to the nine county planning commissioners immediately. thank you

When the Whatcom County Planners meet to discuss the Birch Bay Watershed Action Plan, please convey to them my request to amend the proposed new code section 16.16.92OE of the Birch Bay Watershed Action Plan to expressly **disallow new reduced buffer widths** for the **Cherry Point Industrial District and UGA**. The County should **not adopt** amendments that would allow reduced buffer widths for the proposed Gateway Pacific coal terminal, particularly even before the environmental review process is completed. The proposed amendments to the Birch Bay Watershed Action Plan should expressly state they do not apply to the Cherry Point Industrial District and UGA, and that they only apply to residential construction, not to industrial construction.

I am very concerned about sending coal trains through our neighborhoods that will carry new coal to China, increasing the world's air pollution and adding to global warming CO2 at a time when we should be phasing out coal and concentrating our resources on alternative energy sources. Thank you.

Lin McJunkin  
18529 Main St.  
Conway, WA 98238

**PDS\_Planning\_Commission - Attn: Becky Boxx re: Birch Bay Watershed Plan**

**From:** "Lin McJunkin" <mcjunkin@wavecable.com>  
**To:** <PDS\_Planning\_Commission@co.whatcom.wa.us>  
**Date:** 12/7/2011 9:06 AM  
**Subject:** Attn: Becky Boxx re: Birch Bay Watershed Plan

Becky:

When the Whatcom County Planners meet to discuss the Birch Bay Watershed Action Plan, please convey to them my request to amend the proposed new code section 16.16.92OE of the Birch Bay Watershed Action Plan to expressly **disallow new reduced buffer widths** for the **Cherry Point** Industrial District and UGA. The County should **not adopt** amendments that would allow reduced buffer widths for the proposed Gateway Pacific coal terminal, particularly even before the environmental review process is completed. The proposed amendments to the Birch Bay Watershed Action Plan should expressly state they do not apply to the Cherry Point Industrial District and UGA, and that they only apply to residential construction, not to industrial construction.

I am very concerned about sending coal trains through our neighborhoods that will carry new coal to China, increasing the world's air pollution and adding to global warming CO2 at a time when we should be phasing out coal and concentrating our resources on alternative energy sources. Thank you.

Lin McJunkin  
18529 Main St.  
Conway, WA 98238

**PDS\_Planning\_Commission - Attn: Becky Boxx...Re: Birch Bay Watershed Action Plan, Dec. 8, 2011agenda item**

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**From:** michael cook <mike@heartofengagement.com>  
**To:** <PDS\_Planning\_Commission@co.whatcom.wa.us>  
**Date:** 12/7/2011 6:53 AM  
**Subject:** Attn: Becky Boxx...Re: Birch Bay Watershed Action Plan, Dec. 8, 2011agenda item

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Becky: I am writing you on behalf of my personal interest as a citizen in the area with the following request for the planning commissioners. Please pass this request along before the meeting on December 9th.

Please amend proposed new code section 16.16.92OE of the Birch Bay Watershed Action Plan to expressly disallow new reduced buffer widths for the Cherry Point Industrial District and UGA. Whatever changes are made, if any, by the County should not adopt amendments that would allow reduced buffer widths for the proposed Gateway Pacific coal terminal. Any action along these lines seems premature particularly even before the environmental review process is completed.

If the Commissioners should chose to move forward with amendments to the Birch Bay Watershed Action Plan it should be expressly stated that they do not apply to the Cherry Point Industrial District and UGA, and that they only apply to residential construction, not to industrial construction.

Thank you and thanks for the work you do on our behalf.

Best regards,

--

Mike Cook

AMJ Group, Mid-Level Management Coaching and Development

4117 Kingsway, Anacortes, WA 98221

Phone: 360-588-4304

blog: [www.heartofengagement.com](http://www.heartofengagement.com)

"We are more successful together than we are alone."

Peggy Holman, *'Engaging Emergence'*

**PDS\_Planning\_Commission - Business Rules - Sections 7 and 10b**

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**From:** "john lesow" <jlesow@whidbey.net>  
**To:** "Whatcom Planning Commission" <pds\_planning\_commission@co.whatcom.wa.us>, "Michelle Luke" <michelle@luke-inc.com>  
**Date:** 12/7/2011 6:26 AM  
**Subject:** Business Rules - Sections 7 and 10b  
**CC:** <rmichael@co.whatcom.wa.us>, "Royce Buckingham" <RBucking@co.whatcom.wa.us>

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We have been playing it fast and loose with the Business Rules and I suggest we tighten things up, starting with tomorrow's hearing

particularly with regard to the referenced

Thank you

John Lesow

**From:** Eric Hirst <EricHirst@comcast.net>  
**To:** <pgill@co.whatcom.wa.us>  
**Date:** 12/7/2011 7:45 AM  
**Subject:** Fwd: Revise 16.16.920E to exclude Cherry Point

>Date: Tue, 06 Dec 2011 08:30:10 -0800  
>To: PDS\_Planning\_Commission@co.whatcom.wa.us  
>From: Eric Hirst <EricHirst@comcast.net>  
>Subject: Revise 16.16.920E to exclude Cherry Point  
>Cc: council@co.whatcom.wa.us

>Dear members of the Whatcom County Planning Commission,

>I urge you to explicitly exclude the Cherry Point industrial area  
>(the site of the proposed GPT coal-handling facility) from the BIRCH  
>BAY WATERSHED-BASED MANAGEMENT PLAN (16.16.920E). Recent emails and  
>blog postings note considerable confusion over whether this proposed  
>change in the size of buffers applies only to Birch Bay (as it  
>should) or also includes Cherry Point.

>Just to be clear, I strongly oppose any reduction in wetland buffers  
>on the Cherry Point site. I urge you to make this clear in the final rule.

>Thank you.

>Eric

>-----  
>Eric Hirst  
>1932 Rhododendron Way  
>Bellingham, WA 98229  
>(360-656-6690 :EricHirst@comcast.net

**From:** michael cook <mike@heartofengagement.com>  
**To:** <pgill@co.whatcom.wa.us>  
**Date:** 12/7/2011 6:49 AM  
**Subject:** Re: Birch Bay Watershed Action Plan, Dec. 8, 2011 agenda item

Peter: I am writing you on behalf of my personal interest as a citizen in the area with the following request for the planning commissioners

Please amend proposed new code section 16.16.92OE of the Birch Bay Watershed Action Plan to expressly disallow new reduced buffer widths for the Cherry Point Industrial District and UGA. Whatever changes are made, if any, by the County should not adopt amendments that would allow reduced buffer widths for the proposed Gateway Pacific coal terminal. Any action along these lines seems premature particularly even before the environmental review process is completed.

If the Commissioners should chose to move forward with amendments to the Birch Bay Watershed Action Plan it should be expressly stated that they do not apply to the Cherry Point Industrial District and UGA, and that they only apply to residential construction, not to industrial construction.

Thank you and thanks for the work you do on behalf of all of us.

--  
Mike Cook

AMJ Group, Mid-Level Management Coaching and Development  
4117 Kingsway, Anacortes, WA 98221  
Phone:360-588-4304  
blog: [www.heartofengagement.com](http://www.heartofengagement.com)

"We are more successful together than we are alone."

Peggy Holman, \*Engaging

Emergence!\*

**PDS\_Planning\_Commission - RE: Cherry Point Industrial District and UGA.**

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**From:** Helga Aldrich <snow\_flakes4@hotmail.com>  
**To:** <pds\_planning\_commission@co.whatcom.wa.us>, <kmann@co.whatcom.wa.us>  
**Date:** 12/7/2011 9:11 PM  
**Subject:** RE: Cherry Point Industrial District and UGA.

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Dear Whatcom County Council,

My friend, Shery Russell, sent the letter below to you. She very eloquently stated exactly how I feel. Please add my very adamant voice of opposition to the proposed Cherry Point Coal terminal.

As a retired registered nurse, I also stand with the many physicians of this area who are warning of the many adverse, irreversible health effects we would be facing.

Please vote to preserve the quality of this beautiful area. The alternative is unforgivable when I think of my grand-children's future here.

Thank you,

Helga Aldrich

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Dear Whatcom County Council,

I am writing because I am opposed to the mining and exporting of coal, and in particular, the development of the proposed Gateway Pacific terminal at Cherry Point and the exporting of coal from that proposed terminal.

Regarding the meeting this Thursday, I want to encourage you to vote in favor of maximum preservation of the water quality in the Cherry Point Industrial District and UGA.

Please do not consider regulation changes that would allow an additional 10% reduction in buffers on wetlands and creeks in the Cherry Point Industrial Zone (compared to what is currently allowed).

**Do not include industrial projects in this program.** It is my understanding this program was created for residential and commercial use where onsite mitigation cannot be easily employed because of space constraints. Industrial projects should not qualify because they are not hampered by the same constraints and because on-site mitigation is preferred whenever it can be used successfully.

To guard against the ability to use this program for industrial lands, please make the following code changes:

- a) Strike the sentence in 16.16.920E: "Projects within the Cherry Point Industrial District that impacts stream and/or wetland buffers may utilize the HMF for off-site buffer habitat mitigation with the approval of the Director of Planning and Development Services," as recommended by Perter Gill in a memo to the Planning Commission on December 2 2011.
- b) Amend the sentence in section 20.50.030 (3) from "The benefits are available to residential and commercial development, as well as short subdivisions and long subdivisions, and binding site plans." to: The benefits are available to residential and commercial development, as well as short subdivisions and long subdivisions, and binding site plans for residential and commercial development.

Thank you.

Sincerely,

*Sheryl Russell*

**PDS\_Planning\_Commission - NO to Coal Trains and Coal Exports**

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**From:** Catalina Hope <c.hope.us@gmail.com>  
**To:** <PDS\_Planning\_Commission@co.whatcom.wa.us>, <kmann@co.whatcom.wa.us>  
**Date:** 12/7/2011 7:43 PM  
**Subject:** NO to Coal Trains and Coal Exports

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Dear Whatcom County Council,

I am **opposed** to the mining and exporting of coal, and in particular, the development of the proposed Gateway Pacific terminal at Cherry Point and the exporting of coal from that proposed terminal.

Regarding the meeting this Thursday; please vote in favor of maximum preservation of the water quality in the Cherry Point Industrial District and UGA.

Please do not consider regulation changes that would allow an additional 10% reduction in buffers on wetlands and creeks in the Cherry Point Industrial Zone (compared to what is currently allowed).

**Do not include industrial projects in this program.** It is my understanding this program was created for residential and commercial use where onsite mitigation cannot be easily employed because of space constraints. Industrial projects should not qualify because they are not hampered by the same constraints and because on-site mitigation is preferred whenever it can be used successfully.

To guard against the ability to use this program for industrial lands, please make the following code changes:

a) Strike the sentence in 16.16.920E: "Projects within the Cherry Point Industrial District that impacts stream and/or wetland buffers may utilize the HMF for off-site buffer habitat mitigation with the approval of the Director of Planning and Development Services," as recommended by Peter Gill in a memo to the Planning Commission on December 2 2011.

b) Amend the sentence in section 20.50.030 (3) from" "The benefits are available to residential and commercial development, as well as short subdivisions and long subdivisions, and binding site plans." to: The benefits are available to residential and commercial development, as well as short subdivisions and long subdivisions, and binding site plans for residential and commercial development."

Thank you for recognizing that this is a critical issue for Whatcom County and that I, as well friends and family, do NOT want the greater development of the Cherry Point terminal.

Sincerely and respectfully,  
Catalina Hope  
Bellingham, WA

**PDS\_Planning\_Commission - Attn: Ms. Becky Boxx -- Planning Commissioners:  
PLEASE CLARIFY the Birch Bay Watershed Action Plan amendments!**

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**From:** Ken Kaliher <kenkaliher@hotmail.com>  
**To:** <pds\_planning\_commission@co.whatcom.wa.us>  
**Date:** 12/7/2011 5:46 PM  
**Subject:** Attn: Ms. Becky Boxx -- Planning Commissioners: PLEASE CLARIFY the Birch Bay Watershed Action Plan amendments!

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Dear Ms. Boxx,

If possible, please forward my following comments to the nine Whatcom County Planning Commissioners before Thursday evening's meeting, which I am unable to attend in person. Thank you!

Dear Whatcom County Planning Commissioners,

As you are no doubt all too well aware, issues related to SSA's proposal to build North America's largest coal export terminal in our county have become very controversial. This is due in no small part to the widespread perception that proponents or supporters of the SSA proposal are acting in the shadows to move the proposal forward. Whether accurate or not, this perception is of critical importance, and many suspect that county officials are collaborating with SSA/Goldman Sachs, Peabody Energy, and BNSF to push this project through without a thorough, TRANSPARENT review not only of its merits but also of the economic/social/ecological/health/quality-of-life costs this project might entail.

To minimize public confusion about the county's role in the SSA project, and to ensure public trust that the entire affair is being conducted in accordance with the law, and with full consideration of the PUBLIC INTEREST (and not just the megacorporations' profits), **PLEASE CLARIFY THE PROPOSED AMENDMENTS TO THE BIRCH BAY WATERSHED ACTION PLAN to state explicitly that the Action Plan applies only to residential construction, and not to industrial construction.**

With appreciation,

Kenneth L. Kaliher

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1207 Chuckanut Drive, Bellingham, WA 98229-8980  
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**PDS\_Planning\_Commission - Receiving Site/Birch Bay Mitigation Program**

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**From:** "Wendy Harris" <w.harris2007@comcast.net>  
**To:** <PDS\_Planning\_Commission@co.whatcom.wa.us>  
**Date:** 12/7/2011 2:27 PM  
**Subject:** Receiving Site/Birch Bay Mitigation Program  
**CC:** <pds@co.whatcom.wa.us>

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**Public Comment on the Birch Bay In Lieu of Fee Mitigation Program****Receiving Sites**

The Birch Bay alternative mitigation program does not identify specific potential receiving sites. WCC 16.16.940. Yet off-site habitat selection is the most important measure of the ability to achieve environmental enhancement.

The receiving site must have, or be restorable to, greater conservation value than the development site, and must be large enough to mitigate consolidated development projects. To meet these goals, it is best to secure and protect the receiving site before the mitigation program begins. (Guidelines provided by the federal government in the context of in lieu of fee mitigation projects for Sec. 404 of the Clean Water Act, which have been criticized as being too lax, suggest that information on potential sites be provided to the government in advance. <http://www.epa.gov/owow/wetlands/pdf/inlieufee.pdf>.)

Ground work has been done to develop a roster of available sites in the Birch Bay watershed. (Exhibit F of CAO, Sec. 3.5; 8.2). Appendix F of the CAO references a site specific study that identified and prioritized restoration sites in the Birch Bay watershed. (Merrill, 2010). It also references the Birch Bay Watershed Characterization and Pilot Study and a later inventory and assessment of the existing buffer conditions and potential for site restoration. (Anchor QEA, 2010).

However, there has been no attempt to determine if the property is still undeveloped, or available for purchase or easement. While it could be argued that this might affect the property value, these sites are discussed in the referenced studies and are a matter of public record. The Planning Department should evaluate a receiving site's availability, current potential in achieving environmental enhancement, and obtain an updated estimate of purchase prices before this plan is approved.

The procedures for selecting a receiving site are unclear. WCC 16.16.940 states that a list of potential sites will be maintained based on the mitigation fund "co-sponsors" (an undefined term that refers to the Planning Department and Whatcom County Conservation District, although sometimes just the term "sponsors" is used), while Appendix F of the CAO, page 17, discusses factors for the Conservation District to use in determining receiving sites. For clarity, the interlocal agreement that will be executed between the County and the Conservation District should be incorporated as part of the mitigation plan and be included in the public review. (Appendix F, Sec. 5.)

The list of potential sites will be prepared based on "best available information", (WCC 16.16.940). This is a term without meaning, and it appears in several places. I am concerned that this term will be confused with "best available science". The term should be replaced with

specific information establishing objective standards.

This program does not apply to Birch Bay watershed property under the jurisdiction of the Shoreline Management Act. WCC 16.16.920.G. Because the SMA has complicated rules for determining shoreline jurisdiction with regard to wetlands and streams, ineligible areas should be determined and identified as soon as possible. This will help avoid accidental acceptance of an ineligible property or a property owner learning of ineligibility only after he has spent time, money and effort on an application. At a minimum, review of SMA jurisdiction should be included as part of the application process. The objective standards that will be used for determining eligibility should be included as part of this review process.

There are no time constraints listed for the site selection process, and if any exist, this should be clarified. Is this included within the 3 year window for establishing the off-site habitat, or is it in addition to?

Under the in lieu of fee program, the "WCD" is responsible for enrolling receiving sites in the mitigation fund and acquiring rights to property, (Appendix F, Sec.5). What oversight does the Planning Department have in the negotiation process? Must the purchase or easement price be approved by the Planning Department? Is title held by the County and the Conservation District jointly?

Mitigation site plan policies are unclear. Appendix F, Sec. 6, page 13 states that the Whatcom Conservation District will solicit third party technical review of mitigation plans. The next paragraph states that "the third party technical review will be utilized on an as-needed basis by WCD. In Sec. 8.2 on page 18, we are advised that the general procedure is to "present a mitigation plan for selected site(s), and submit to third party technical review for comments." Is technical review a requirement for every mitigation plan?

Appendix F, Sec. 6 on page 13 states that third party reviewers will be chosen by RFQ or similar procurement procedure. The term RFQ is not defined and "similar procurement procedure" is not specific enough to allow for meaningful public review. It is not clear whether the Conservation District is required to revise its mitigation plans based on the third party technical review. This should be clarified.

The number of receiving sites that can be established under the program is not limited. It is an important program goal to consolidate the number of individual on-site mitigation programs in the Birch Bay watershed, but there is no assurance that this will occur without limiting the number of receiving sites. Moreover, studies have concluded that a better outcome normally results from consolidating offsite mitigation into one large piece of habitat. This allows for more diversity of habitat and species and a better ability to protect the site.

Failure to identify receiving sites has public process implications. The Planning Commission and the public can not evaluate and comment on environmental enhancement without reviewing the potential receiving sites and applicable management plans. For example, is the receiving site accessible to fish and wildlife, safe from predators, including pets, protected against human impacts resulting from growth (noise, lights, human presence) and is hunting prohibited? With regard to easements, how will the County ensure that it is large enough to offset numerous development projects and provide habitat for a variety of species?

The Planning Department offers Mount Vernon and King County as examples of jurisdictions considering similar alternative mitigation plans. However, Mount Vernon created a mitigation

banking program where a 400 acre receiving site was obtained prior to implementation of the alternative mitigation program.

<http://www.ecy.wa.gov/programs/sea/wetlands/mitigation/banking/sites/skagit.html>. King County has a mitigation credit program involving a predefined roster of receiving sites. An interagency review team selects sites and oversees mitigation plan development. <http://www.kingcounty.gov/environment/waterandland/wetlands/mitigation-credit-program.aspx>. The Puget Sound Partnership is working on an in lieu of fee program with a four million dollar pre-capitalization fund to establish mitigation projects and purchase receiving sites before fees are collected. Sites are selected by an interagency team based on quantifiable criteria. [http://www.ecy.wa.gov/mitigation/docs/InLieuFee\\_DecisionDoc.pdf](http://www.ecy.wa.gov/mitigation/docs/InLieuFee_DecisionDoc.pdf).

### **Birch Bay Pilot Project Reconciliation**

The program frequently cites to the Birch Bay Watershed Characterization Pilot Project as reference for assumptions and program provisions. The Pilot Project, which was an impressive interagency study utilizing best available science, based its conclusions and recommendation on Birch Bay's existing land use zoning and density. The Pilot Project is 5 years old. Since that time, Whatcom County has updated the rural element of its Comprehensive Plan and adjusted its UGA boundaries. Subsequent to this, the County Council has made at least one, possibly more changes in residential density. Plans for the Gateway Pacific Terminal are moving forward. All of these facts might significantly changes the conclusions and recommendations of the Pilot Project. The Planning Department has not attempted to reconcile the fundament assumptions used in the Pilot Project with new zoning and development.

### **Mitigation Terms**

It would be helpful if the Planning Department could provide an explanation of compensatory mitigation, alternative mitigation, off-site mitigation, and creation, restoration, enhancement and preservation. I remain unclear on distinctions and interconnections and am likely failing to include additional relevant terms. This is a complex issue, and the Planning Commission and the public should understand these concepts before a recommendation is made.

### **Insufficient Clarity**

As reflected in the examples above, the proposed alternative mitigation program, as a whole, requires better identification of watershed boundaries, affected properties and program scope. Terms used loosely without definition which will cause future implementation problems. Parts of the program lack objective standards and do not permit public oversight and government accountability. As drafted, the program relies too heavily on Planning Department discretion and will be difficult to enforce.

I understand and appreciate the amount of time and energy that has been put into this project. I can understand the frustration of the Planning Department. But the fact remains that this is an inherently complex matter. In order for the program to be successful, it requires scientific analysis, detailed and specific procedures and tightly drafted code provisions.

Thank you for considering my comments.

Sincerely,

Wendy Harris

**PDS\_Planning\_Commission - Attn: Becky Boxx**

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**From:** Brianna Fairbanks <brianna.fairbanks@sierraclub.org>  
**To:** <PDS\_Planning\_Commission@co.whatcom.wa.us>  
**Date:** 12/7/2011 12:55 PM  
**Subject:** Attn: Becky Boxx  
**Attachments:** WCC Amendment Comment Letter FINAL.pdf

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Hello Ms. Boxx -

I am writing to submit comments on the proposed amendments to the Whatcom County Code that will be discussed at the Planning Commission meeting tomorrow evening. Please distribute the attached letter to the members of the Planning Commission prior to tomorrow's meeting.

Thank you,

--

Brianna Fairbanks  
Associate Attorney  
Sierra Club Environmental Law Program  
85 Second Street  
San Francisco, CA 94105  
Tel: (415) 977-5706  
Fax: (415) 977-5793

**PDS\_Planning\_Commission - ATTN: Becky Boxx**

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**From:** Carolyn and Ed Gastellum <ecgastel@wavecable.com>  
**To:** <PDS\_Planning\_Commission@co.whatcom.wa.us>  
**Date:** 12/7/2011 12:32 PM  
**Subject:** ATTN: Becky Boxx

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To Ms. Becky Boxx, Coordinator  
Whatcom County PDS

Becky: Would you kindly pass along my comments to the nine Whatcom planning commissioners immediately, prior to the Dec. 8 meeting?

Please amend proposed new code section 16.16.92OE of the Birch Bay Watershed Action Plan to expressly disallow new reduced buffer widths for the Cherry Point Industrial District and UGA. The County should not adopt amendments that would allow reduced buffer widths for the proposed Gateway Pacific coal terminal, particularly even before the environmental review process is completed. The proposed amendments to the Birch Bay Watershed Action Plan should expressly state they do not apply to the Cherry Point Industrial District and UGA, and that they only apply to residential construction, not to industrial construction.

Your decision on the amendments to code section 16.16.92OE is critical at this time when the proposed coal terminal for the Cherry Point Industrial District and UGA is under scrutiny throughout our state. It is vital that your decision does not set precedent in a way that would allow detrimental impacts to waterways and wetlands due to potential toxic runoff and/or infrastructure development.

Ultimately, it is my hope that the Cherry Pt. coal terminal permit will be denied because of the serious negative impacts to waterways, wetlands, and the Aquatic Reserve that is designated in that area. These are among the many concerns about the large coal terminal proposed by SSA Marine.

Thank you for your dedicated work.

Carolyn Gastellum  
14451 Ashley Place  
Anacortes, WA 98221

**From:** luther schutz <mlschutz@earthlink.net>  
**To:** <PDS\_Planning\_Commission@co.whatcom.wa.us>  
**CC:** <pgill@co.whatcom.wa.us>  
**Date:** 12/7/2011 10:32 AM  
**Subject:** coal terminal

Please amend proposed new code section 16.16 92OE of the Birch Bay Watershed Action Plan to expressly disallow new reduced buffer widths for the Cherry Point Industrial District and UGA

Sincerely, Luther Schutz MD

**From:** Peter Gill  
**To:** Pamela Brown  
**CC:** Roxanne Michael  
**Date:** 12/7/2011 10:01 AM  
**Subject:** Comments to forward to PC  
**Attachments:** Binder-dec-comments-pg-inbox.pdf

Pam,

Attached are the comments submitted to my inbox through end of day Tuesday. There are likely duplicates with what PC has already gotten, but better duplicate than miss one.

Please forward to PLanning Commission.

Thank you.  
Peter