

GOVERNORS POINT LAND LP

862 Peace Portal Way, Suite 101
Blaine, Washington 98230

July 8, 2018

Amy Keenan
Senior Planner
Whatcom County Planning and Development Services
Northwest Annex, Suite B
5280 Northwest Drive
Bellingham, Washington 98226

Received
JUL 10 2019
Whatcom County PDS

RE: Additional Information Submitted in Response to:
Whatcom County Governors Point Long Subdivision, Shoreline Substantial Permit and Development Agreement, LSS2018-0003, SHR2018-00018, SEP2018-00124 and PLN2018-00016 Notice of Additional Requirements (NOAR)

Dear Amy:

Please accept this transmittal letter as an annotated index to the additional requirements noted in your letter of March 14, 2019. Response are provided below in blue and in attachments.

Current Planning

1. Submit an updated SEPA checklist consistent with the studies requested in this NOAR.

See Attachment 1. *Updated 12-31-18 Governors Point Long Subdivision Application SEPA Checklist*

Shorelines/Critical Areas – Wetlands and Habitat Conservation Areas

2. An updated and current Wetland Delineation authored by a qualified wetland biologist from our approved list.

See Attachment 2. *Wetland & Habitat Conservation Area Assessment*

3. Site plan(s) that show the location of all proposed overwater structures, community recreation facilities (restrooms, trails, kayak racks or similar upland storage etc.) roads, driveways, utilities, ordinary high water mark and critical areas.

See Attachment 3. *Dock Plan Set 5.20.19*

4. Proposed design of overwater structures. At the time of submittal fees for review of technical reports will be applied in accordance with the UFS in effect at the time.

See Attachment 3. *Dock Plan Set 5.20.19*

5. Archaeology Assessment for the entire project area. The report will be provided to DHAP and affected tribes for a 15 day comment period.

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See Attachment 4. *Governors_Pt_Iss_2018-00003_Drayton_Report_0519C_June_3*

6. Eel grass and Macro Algae delineation that follows the WDFW Eelgrass/Macroalgae Habitat Interim Survey Guidelines (<http://wdfw.wa.gov/publications/00714/wdfw00714.pdf>)

See Attachment 2. *Wetland & Habitat Conservation Area Assessment*

7. Critical Areas Assessment authored by a qualified biologist from our approved list for the impacts of the proposed upland development and in water working including piers and docks to all in water and nearshore resources listed above. All elements in WCC 16.16.255(A) which includes the alternatives analysis in WCC 16.16.255(H).

See Attachment 5. *Habitat Conservation Areas No Net Loss Assessment*

8. Forest Ecosystem study to show impacts to the contiguous forest area from the development proposal shall discuss ecosystem function and ecosystem wide process including and not limited to loss of canopy, temperature regulation, nutrient exchange with the marine environment, and species diversity and abundance.

See Attachment 5. *Habitat Conservation Areas No Net Loss Assessment*

9. If there are community recreation areas and/or community trails or public trails proposed as part of the long plat application then a study will be completed using the uses best available methodology to understand that amount of public use, noise and disruption to any critical areas will occur. Recreation study should include user surveys and sampling from similar public facilities in the area and determine peak times and numbers of users. Should explore potential impacts from public access based on the amount of hours per day and days per week facilities are easily accessible to the public. General maintenance of the facilities and security measures should be assessed and discussed as mitigating factors for any environmental impact public recreational facilities and access may create.

During discussions with Ryan Erickson, PDS Supervisor - Natural Resources, it was determined that issues relating to development and management of Tract A would be evaluated as proposed by Whatcom Land Trust under a future permit.

10. Provide a bird survey that focuses on the presence of Heron rookeries, Bald Eagle or Golden Eagle Nests, Pileated Woodpecker, migratory birds, waterfowl and shoreline birds.

See Attachment 2. *Wetland & Habitat Conservation Area Assessment*

Critical Areas – Geologic Hazards

11. Supplemental geotechnical analysis is required for all proposed stormwater disposal and septic drainfield systems located in or adjacent to regulated landslide or erosion hazard areas.

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Geotechnical information is contained in the report entitled "*Geotechnical Assessment Report*" dated October 29, 2018 as Exhibit 11 to Attachment A of the Governors Point Project Narrative in the Preliminary Long Subdivision and Shoreline Substantial Development Permit Application. In the General Summary, the author states: "*It is our opinion that, with respect to steep slope, landslide, and erosion hazard potential, the currently planned lots at the Governors Point site are likely buildable according to their current configuration, and that these hazards can be mitigated with a combination of shoreline and building setbacks, and geotechnical engineering and site development BMPs related to grading, erosion control, and drainage.*"

Site plans locating homesites, drainfields, and stormwater infiltration or disbursement facilities for the sixteen individual residential lots (numbers 1-7 and 9-17) and one non-residential lot (number 18) have not been prepared at this time.

12. Please note: alterations to the proposed lot configuration or a reduced shoreline setback may require supplemental geotechnical analysis.

Noted.

Health

13. An on-site sewage system (OSS) subdivision application demonstrating adequate soils for all lots must be submitted and approved by WCHD prior to preliminary approval. All soils approvals for the plat must be located outside of critical areas and their associated buffers.

See Attachment 6. *Lot Drainfield Layouts with field notes*

Public Works

14. Provide a station breakdown with cross-sections of roadway in proposed areas where, due to topography, you cannot meet required road width. Make changes to road turnaround as necessary to meet standards. Additional road redesign may be required to accommodate widened road width where fire hydrants are required, and additional parking if the parking areas shown are to be primary parking for the lots.

See Attachment 7. *Governors Point Long Plat Road and Utilities Schematic*

See Attachment 8. *Private Road Request & Support Letter 2019-07-08*

15. Show adequate sight distance on Pleasant Bay Road for number of proposed users.

See Attachment 7. *Governors Point Long Plat Road and Utilities Schematic*

See Attachment 10. *Governor's Point TIA - Final (004)*

16. Revise Stormwater Site Plan as necessary. A more detailed site plan for each lot, in consultation with a geotechnical engineer, may be required to show that roadway, roof, and lawn dispersion have an adequate slope and flowpath through each lot. The report shall demonstrate that each buildable lot

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can accommodate the stormwater from up to 4,000 square feet of hard surface, consistent with the current DOE stormwater manual.

See response under # 11 above for a discussion of site planning for individual residential lots' stormwater management.

See Attachment 9. *NOAR Revised Governors Point Stormwater Report and Cover Memo*

Traffic Impact Analysis

See Attachment 10. *Governor's Point TIA - Final (004)*

Please contact me if there are any questions.

Sincerely,



Wayne Schwandt

Agent for Governors Point Land LP

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Bellingham, Washington 98229

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- Attachment 1: Updated 12-31-18 Governors Point Long Subdivision Application SEPA Checklist
- Attachment 2: Wetland & Habitat Conservation Area Assessment
- Attachment 3: Dock Plan Set 5.20.19
- Attachment 4: *Governors_Pt_Iss_2018-00003_Drayton_Report_0519C_June_3*
- Attachment 5: Habitat Conservation Areas No Net Loss Assessment
- Attachment 6: Lot Drainfield Layouts with field notes
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