City of Bellingham - Permit Center
210 Lottie Street - Bellingham, WA 98225
Phone: (360) 778-8300
E-MAIL: permits@cob.org

Pre-Application Letter

Project Number: PRE2023-0072

Scope of Work: **NEW MULTI-FAMILY BUILDING**

Site Address: **1221 LINCOLN ST**

City, State Zip Code: **Bellingham, WA 98229-5715**

Applicant: **DEREK STEBNER**

Owner: **LANGSTAN MANAGEMENT LLC**

Meeting Date: 07/25/2023
Meeting Time: 8:30 AM

LIST OF REVIEWS			
TYPE	**CONTACT**	**PHONE**	**EMAIL**
BUILDING	Darin MacGillivray	(360)-778-8330	drmacgillivray@cob.org
Notes: No questions asked of Building Services and not enough information on plans to warrant meaningful commentary. Building Services will not attend meeting unless requested otherwise.			
FIRE - ADDRESSING	Lisa Brogan	(360)-778-8429	lbrogan@cob.org
Notes: Based on the information provided, 1221 Lincoln St is an acceptable address for the project. A postal and parcel location is required to be included in the design of the building, please contact the Post Office to determine the required size. The address is required to be posted in multiple locations, large enough and high enough on the building to be clearly visible. Provide floor plans to lbrogan@cob.org for unit number assignment. The unit numbers are assigned by the Address Team, so advance floor plans are helpful, so they don't have to be updated at time of building permit submission.			
FIRE - LAND USE	Darren Wood	(360)-778-8421	dwood@cob.org
Notes: FIRE - LAND USE FIRE APPARATUS / AMBULANCE ACCESS: 1. Fire apparatus access roads must have an unobstructed width of 20 feet, an unobstructed vertical clearance of 13' 6", and either be engineered to handle imposed loads of 75,000 lbs,			

be constructed to HS-20 standards, or meet or exceed City of Bellingham Public Works residential street standards. Lincoln St. and proposed internal access appear to meet these requirements.

2. In your proposed option, the internal private access and parking lots will also serve as fire apparatus access roads. The private portions of the fire apparatus access road must also meet the requirements detailed in paragraph (1) above, but they will be approved and installed under an FIR-Fire Apparatus Access Road permit. Application for the FIR permit shall be made concurrent with associated Public Facilities Contract (PFC) permits and prior to the building permit for the first structure.

3. Fire apparatus access roads must allow staging within 150 feet of all points of the first-floor exterior of the building (the “hose pull” requirement). The proposed design achieves this when incorporating the internal private access and parking lots.

4. Any dead-end fire apparatus access road greater than 150 feet must be provided with one of the four approved turnaround designs in BMC 17.20 Section 503.2.5. Your site plan appears to show through access. If thorough access is not provided then you will need to amend your plan to show options incorporates a turnaround that meets an approved design. This will be confirmed and approved with the FIR-Fire Apparatus Access Road permit mentioned above.

5. Powered garage gates/doors and security gates must be equipped with a Knox-brand key switch (model #3502) keyed to the Bellingham jurisdiction located on the adjacent exterior wall or at the exterior keypad console used by residents.

6. If planning to have a stormwater detention vault or other underground structure beneath or near a drivable road surface, you must comply with BMC 503.2.10. This states that underground structures under or within 10 feet of a road must be designed to accommodate the point load design criteria for aerial apparatus access roads found in BMC 503.7 (see AERIAL APPARATUS ACCESS section).

AERIAL APPARATUS ACCESS:

1. This design will trigger the aerial apparatus access requirements. Per BMC 503.7, an aerial apparatus access road of 26 feet minimum width must be provided in the immediate vicinity of any building or portion of a building measuring greater than 30 feet in height (measured from the lowest level of fire department access to the eave or top of the roof parapet). This aerial access must be positioned parallel to one side of the building no closer than 15 feet and no more than 30 feet from the building and must be engineered to meet surface point load requirements of 44,298 pounds over an area of 24" x 24" square. No utility lines, trees greater than 20 feet in height, or other obstructions may be located in the aerial apparatus access road or between the aerial access and the building (IFC D105.4, BMC 503.7.4). In addition, an aerial apparatus access road must be designed with a longitudinal slope less than 10% and a

lateral slope less than 13% (BMC 503.7.5). Lincoln St. meets this requirement.

FIRE FLOW / WATER SUPPLY / HYDRANTS:

1. Total building area provided is 123,000 sq ft for each constructed of Type V-A/Type I construction (per application) After applying sprinkler system credit, the fire flow requirement is 1,625 gpm at 20 psi. Public Works fireflow modeling shows that 5000 gpm is available at the site.

2. Additional hydrants are required for this project to meet the commercial hydrant spacing standards (average spacing of 300 feet and a hydrant located within 150 feet of any point on the fire apparatus access road) and arterial standards.

SYSTEMS REQUIREMENTS:

1. The proposed building requires a sprinkler system. Per IFC 903.2.8, structures with Group R fire areas are required to be sprinklered throughout. The proposed number of stories and height (more than 60 feet above grade plane) require each building to be sprinklered to NFPA 13 standards.

2. Each sprinklered building requires a monitored fire alarm system, which is activated by waterflow within the sprinkler system (IFC 903.4.2). A fire alarm annunciator panel must be located in the main entry lobby.

3. For multi-story buildings, the sprinkler system shall be equipped to provide a separate alarm zone for each floor (BMC 903.4.4).

4. The sprinkler riser and fire alarm control panel shall be co-located in a dedicated room with exterior access, lighting, temperature monitoring, and heat for the room (BMC 903.3.9, 907.6.7). Signage on the door must state “Fire Sprinkler & Fire Alarm Control Room.”

5. Per BMC 17.20 Section 901.4.6.1, the sprinkler riser room shall be sized so that minimum of 10 square feet of floor area is provided per building story. If taking advantage of the State’s allowance for a 5th story above the concrete podium, shaft pressurization panels will also be required inside the sprinkler riser room. As such, you may have to increase the size of the sprinkler riser room above the minimum to accommodate this additional equipment.

6. A Class I standpipe must be installed in any building where the floor level of the highest occupied floor is 4 or more stories or more than 30 feet above the lowest level of fire department access (IFC 905.3.1). This building will require a standpipe system.

7. The sprinkler/standpipe fire department connections (FDCs) shall be in approved locations

and within 100 feet of a hydrant, but in a location that does not obstruct access of other fire apparatus (IFC 912.2).

FIRE - LAND USE

Depending on the location of your sprinkler riser rooms, wall-mounted FDCs may be acceptable. FDCs shall be located in a manner in which landscaping will not obscure or block access to them in the future. In addition, an “FDC” sign is required to be mounted 60 inches above a wall-mounted FDC.

8. To take advantage of the State’s allowance for a 5th story above the concrete podium, the buildings must be equipped with an emergency generator and stairwell pressurization. An emergency generator is the only option for standby power with building requiring stairwell pressurization. Since these systems are an integral part of the building’s design, plans for these systems must be received concurrently with the building plans.

9. The building will require an emergency responder radio analysis to be conducted. Any deficiencies found must be corrected prior certificate of occupancy issuance. Testing is performed by Public Works-Communications staff. You are encouraged to pre-plan for the installation of an in-building radio enhancement system by installing conduit between floors during construction in the event a system is required.

10. A portable fire extinguisher plan will be required with building permit applications to include type, size and mounting details. Portable fire extinguishers must have a minimum size/rating of 2A10BC. Extinguishers shall be provided on each floor with one for every 3,000 square feet and no more than 75 feet of travel distance. They must be in conspicuous locations and mounted no more than 5 feet off the floor (IFC 906).

11. Buildings requiring a sprinkler system and/or a fire alarm system require an approved, recessed Knox Box key box mounted at the main entry. Approved key box m

odels can be found at www.knoxbox.com by searching under the "Bellingham Fire Department" jurisdiction (IFC 506.1). Due to each building's size and potential configuration, a second Knox key box may be required.

12. Each building must have an elevator sized to accommodate a gurney.

ADDITIONAL PERMITS REQUIRED:

The following additional, separate permits will be required for each building:
a. Fire Service Main permit
b. Fire Sprinkler/Standpipe permit
c. Fire Alarm System permit
d. Fire Apparatus Access Road permit.
e. Emergency Responder Radio System permit (if testing reveals that an in-building radio enhancement system is required)

PARKS - RECREATION	Peter Gill		pjgill@cob.org

Notes:

Street trees are also required along Lincoln Street. Park Impact Fees are required.

Completed by KMB.

PLANNING	Kathy Bell	(360)-778-8347	kbell@cob.org

Notes:

1221 Lincoln Street
Preapplication Comments
July 25, 2023

General
The proposal will be required to meet residential design requirements. Staff anticipates continued discussion with you to achieve these requirements.

The proposal is subject to both commercial and residential design requirements, BMC 20.25.020(B) and 20.25.090.

All development regulations will be subject to the planned contract for commercial regulations pursuant to Chapter 20.33. The proposal relies on the assumption the entire planned area will have a scalable balance of commercial and residential uses and therefore, assumed the vacant parcel to the south must be a permitted commercial use.

Parking is not met. Please not parking maneuvering is 22 feet unless angled parking is provided or the stall width is increased. This is an ideal location for a reduction given proximity to transit (WWU and general public), recreation and services. But there is no on street parking available. Shared parking with the commercial properties to the north and south, if available, would be required. Considerations for mitigation to all shared parking include amenities for bike parking that includes repair and wash station, e-bike charging stations, unassigned and unbundled parking.

An addendum to SEPA is required and likely will include additional analysis of the traffic generated by this portion of the site as it relates to that of the planned contract site. Please refer to the planned contract's 3rd SEPA addendum for additional information.

Please work with Building Services and Planning to ensure the unit layout is consistent with the City's definition of studio units.

More information specific to the information above is provided in the attached email chain from March 1, 2023.

Please contact SSC for requirements associated with garbage collection:
Rodd Pemble
Recycling/Safety Manager
Sanitary Service Company Inc.
21 Bellwether Way Suite 404 • Bellingham, WA 98225
Cell 360-815-1098 • Fax 360-671-0239 • Direct 360-527-9785

March email and 3rd SEPA addendum attached.

PW - ENGINEERING	Jeremy Thompson	(360)-778-7925	jdthompson@cob.org

Notes:

PRE2023-0072 1221Lincoln Street
5-story multifamily

RESPONSE TO QUESTIONS FROM PRE-APP
1) Regarding extinguishing easement/dedicating easements: This is part of the PFC process. Applications/forms are available at https://cob.org/services/permits/forms-public-works under the projects/property section.
2) After speaking with operations, 35’ from FG to bottom of lowest member above the easement will be sufficient for access. No encroachment on the easement at FG will be permitted.
3) Incorporation of the stormwater pond into site improvements is permissible. SSP shall document existing function and demonstrate matching function in new facility. The off-site contributing area currently draining to the existing pond shall be documented in its own section of the report.

EXISTING CONDITIONS
This project abuts a water stub extending NE from Viking Circle and a stub extended SW from the property to the NE. A sewer main runs through the south end of the property between Viking and Lincoln. A stormwater pond is located on the SE corner of the site adjacent to the intersection of Lincoln and Viking and discharges to Lincoln Creek. Stormwater discharges to Lincoln Creek by sheet flow. A public storm main discharges to Lincoln Creek after crossing the property. A public utility easement runs the length of the property through the middle of the site. A conservation easement exists along Lincoln Creek on the west side of the property. The PCI of Lincoln is 72. Viking Circle is not a publicly maintained street.
REQUIRED IMPROVEMENTS

Access/Street
1) ADA route to building is required from Lincoln is required.
2) Vehicular access to be taken from Viking Circle.
3) Overlay of Lincoln is required based on PCI, however the condition of the concrete does not appear to warrant it.

Water
4) Extend 8” water main through site. 15’ easement is not sufficient. 10’ required on either side of pipe per DGIS 2-6.

Sewer
5) Reroute is proposed. Manholes required at changes in horizontal geometry. 20’ wide easement required. Separation to meet WA DOE Orange Book requirements.

Storm
6) No public improvements anticipated. Project appears to trigger MRs 1-9.

Transportation
7) See attached transportation impact fee sheet. This is an estimate only.
8) Peak hour trips exceeds 50. TIA required per DGIS 11-1.

Questions:
1. It will need to be demonstrated that the City will be able to access/maintain/replace the pipe in perpetuity. The impacts of having such a design and the consequences of potential pipe failure must also be acknowledged and accepted by the developer.
2. Sanitary reroute is feasible.
3. Easement is not sufficient.
4. Fire to respond.

REQUIRED PERMITS

A public facilities construction agreement (PFC) is required for any public infrastructure improvements. Application is available online. Civil engineer will be required to prepare plans and the City will review and approve consistency with standards and requirements. Agreement will require a performance bond for 150% of the engineered cost estimate of public improvements in the R/W or 25% for improvements on-property. The PFC is required before or concurrently with plat or building permit. Utilities must be installed and stubbed to property line, prior to plat acceptance or building final. A maintenance bond for 1 year is required.

A new water and sewer service, with associated development charges, will be a part of the building permit. Stormwater management for on-site will be reviewed with the building permit. The frontage improvements and site development is one project so please provide the Stormwater Site Plan with both applications.

FEES
1) Permit fees and System Development Charge rates are available in the Permit Center at City Hall or can be downloaded at: https://cob.org/wp-content/uploads/public-works-fees.pdf.*

Preliminary stormwater report NOT provided. No private storm mains in the R/W. Complete off-site analysis before going further with design.

STORMWATER MANAGEMENT REQUIRED
1) Stormwater regulations and design standards must be done in accordance with Bellingham Municipal Code 15.42 and the current edition of the Stormwater Management Manual for Western Washington respectively. The stormwater manual is intended to provide a supplement to this BMC to control the quantity and quality of stormwater runoff from new

development and redevelopment. The stormwater manual shall be used for the guidance of designs, reports and construction for all development and redevelopment within the city of Bellingham except where this chapter provides for more specific direction regarding stormwater management.

2) Per BMC 15.42.060(F)1. Project facilities that are required by state law to be designed by a professional engineer must also be certified by the engineer of record that facilities have been constructed to design specifications. This shall be accomplished by providing certified as-built drawings of the stormwater facilities.

3) All known, available and reasonable source control BMPs shall be applied to all projects. Source control BMPs shall be selected, designed, and maintained according to the Stormwater Management Manual for Western Washington. Source Controls that are applicable to a project shall be indicated on the Stormwater Site Plan and contained within the stormwater engineering report.

4) Required frontage improvements are considered part of the project and count towards stormwater mitigation thresholds. If stormwater thresholds are met or exceeded by the project then there are three options for mitigating stormwater for off-site improvements. One option would be to provide stormwater mitigation off-site in a separate stormwater facility and dedicate the facility to the City. Another option would be to route the off-site stormwater on-site, and provide mitigation in a combined on-site, off-site stormwater system. This single facility is owned and maintained by the property owner. If a combined stormwater facility is desired, then a drainage release for the City is required. The drainage release is to waive the operation and maintenance requirements of the City on a privately owned stormwater facility, even though it mitigates stormwater from City right-of-way. The development section of public works can provide the instructions necessary to complete the drainage release. The third option is to over-detain the private property generated stormwater, in accordance with the current edition of the Stormwater Management Manual for Western Washington, in order to meet the flow duration standards for the project. Water quality treatment must be for the pollution generating impervious surfaces that are being created/replaced.

5) On-site soils information is required for assessing feasibility for required on-site stormwater management methods. Investigations ideally should be completed during the wet season. A soils report is required that covers the proposed development with enough field information to assess feasibility.

6) Development projects that discharge stormwater off-site shall submit an off-site analysis report that assesses the potential off-site water quality, erosion, slope stability, and drainage impacts associated with the project and that proposes appropriate mitigation of those impacts. An initial qualitative analysis shall extend downstream for the entire flow path from the project site to the receiving water or up to one mile, whichever is less. If a receiving water is within

one-quarter mile, the analysis shall extend within the receiving water to one-quarter mile from the project site. The analysis shall extend one-quarter mile beyond any improvements proposed as mitigation. The analysis must extend upstream to a point where any backwater effects created by the project cease. Upon review of the qualitative analysis, a quantitative analysis may be required. (See Manual for more guidance and see recently updated Stormwater Comprehensive Plan (2020)).

PW - STORMWATER	Jeremy Thompson	(360)-778-7925	jdthompson@cob.org

Notes:

See PW-Engineering comments.

City of Bellingham Public Works

104 W. Magnolia St., Suite 109, Bellingham, WA 98225

FIREFLOW INQUIRY / RESPONSE FORM

To:	Project # / Building Permit #:	Today's Date:
PRE2023-0072	1221 Lincoln St.	July 18, 2023

With respect to your:	Dated:	Regarding:
X Letter/fax/email Telephone call Office walk-in	07-17-23 **Received:** 07-18-23	Pressure at site

Please note the following:		
X acknowledge receipt of subject inquiry/correspondence	X Final reply ☐ Fire flow from Hydrant Test ☐ Interim reply **X** Fire flow from Hydrant modeling	Estimated date for final reply is:

****This data was generated by computer modeling and is provided for preliminary design work only. If the flows provided below only meet your required flow by a small margin it is recommended that you hire a professional and have a field flow test conducted under the supervision of the Public Works Department. The City of Bellingham will not be held responsible for any sprinkler system and/or Fire Flow that does not pass Fire Department inspection. Please contact the Public Works Department for more information.

J1

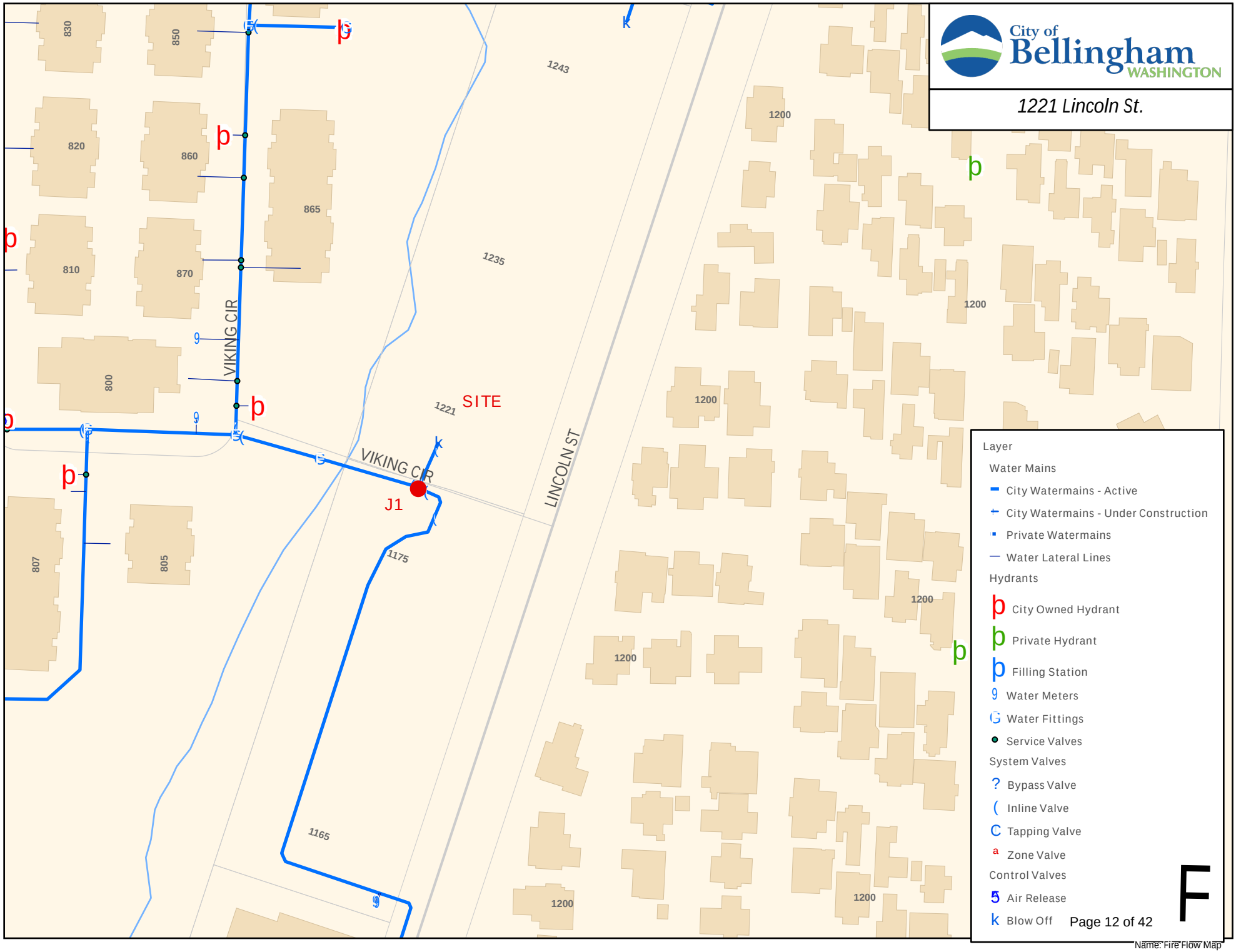
Static Pressure = 129psi

Residual Pressure @ 1000gpm = 123psi
Residual Pressure @ 2000gpm = 109psi
Residual Pressure @ 3000gpm = 89psi

Flow exceeds 5000gpm @ 20psi

From the desk of….

Jim Bergner
Utility Operations Engineer
P: 360.778.7731
Email: jbergner@cob.org



Name: Fire Flow Map
7/18/2023 7:47 AM
User: jbergner

Bell, Kathy M.

From: Anthony Houtz <AnthonyHoutz@cushingterrell.com>
Sent: Wednesday, March 1, 2023 12:11 PM
To: Bell, Kathy M.
Cc: derekrstebner@gmail.com
Subject: RE: 1155(ish) Lincoln Street MultiFamily

Thank you Kathy for the conversation today. Below are my notes from our discussion. Please let me know if I've misinterpreted anything or if you have more to add.

Thanks again!

Cushing Terrell.

Anthony Houtz AIA, LEED AP
Project Manager | Architect | Associate Principal
406.452.3321 cushingterrell.com
#DesignMeetsYou

Zweig | 2022 Best Firms to Work For

From: Anthony Houtz <AnthonyHoutz@cushingterrell.com>
Sent: Tuesday, February 14, 2023 10:24 AM
To: Bell, Kathy M. <kbell@cob.org>
Cc: derekrstebner@gmail.com
Subject: 1155(ish) Lincoln Street MultiFamily

Good morning Kathy –

Per our last discussion, we have begun to add more conceptual detail to the proposed layout of the multifamily building on Lincoln Street, and would like to request your input and approval of the conceptual direction for the building massing and relationship with the street in light of the priorities of the municipal code.

We are not yet asking for full approval of all the conditions of the code, but definitely would like your approval on the massing/height, and on our general approach to the following code-delineated criteria so that we can confidently move forward with design of the project.

Our assumptions and calculations are as follows :

1. Targeting up to 200 units, all studios, in 3 or 4 different configurations, but all studios.
    i. **Definition of Studio is critical – IF beds are away from the open living area, need to be minimum 50% open to each other.**
2. We are targeting at least 174 stalls on site. We have potential to get a few more, but are targeting 174 minimum.

a. We are planning to incorporate a fair amount (30- ish or more) of bicycle parking stalls, final number yet to be negotiated/determined based on a traffic engineer's input.
    i. **Bicycle parking is great – most multifamilies have lack of supply, so more is better and good.**
        1. **Lack of space and depth for ebikes. Advise providing space and charging stations for them.**
    ii. **Shopping in walking distance, transportation a few hundred feet away is all, and local commercial all allow for potential parking leniency, but there isn't any extra parking onstreet nearby, so there's a balance. Some neighboring properties have received parking variances, but are losing tenants due to lack of parking.**
    iii. **No assigned parking – can't bundle parking with rent (can't guarantee any specific stalls in the rent agreement).**

3. Open space, at 25% of the total site area will be approximately 27,000 sq ft. The landscape buffer area on the property is just below 33,000 sq ft and should satisfy the open space requirement on site.
    i. **City is okay with this approach.**
4. Usable Space, at 250 sf per unit, will need to satisfy one of the following :
    a. Unactivated total usable space of 50,000 sq ft. As our floor plates are approximately 26,000 sq ft, that would equal two floors of space and push the total building higher than we want it. BUT some of this square footage would be accommodated by individual decks at the units.
    b. Active usable space of 25,000 sq ft. This would be one entire floor.
    c. Active usable space with views would need to be 17,000 sf.
    d. Proposed : providing almost the entire roof area to be active usable space with views for the building occupants to utilize. Some community rooms, open deck area, and roofed deck spaces, with combinations of vegetated and hardscaped use areas.
        i. **City is doing code updates in spring. Kurt and Kathy think that the 250 sf/unit is excessive**
        ii. **Project does need to be solar-ready and may need to provide solar due to its size**
            1. **This question will come up in pre-app**
        iii. **No firm square footage for how much usable space. Provide sufficient space for this activity, and make an argument for that sufficiency. Parks are nearby as well as other recreational amenities, and public transit for access to recreational amenities.**
        iv. **Program the community usable spaces – quality is more critical than quantity.**
5. Setbacks :
    a. Front yard minimum 40' from CL of Lincoln
    b. Sideyard 40' from CL of Viking
    c. Sideyards to property lines : 10' at main floor, staggered back to 17.5' at 4th floor.
    d. Rear yards to property line : 20' at main floor, staggered back to 35' at 4th floor.
        i. **Per City : commercial setbacks will apply – so no real setbacks on this project.**
6. Storm is proposed to all be subsurface collection/treatment.
    i. **No real comment – TBD based on City Engineering and preapplication**
7. No commercial uses integrated into the building, as commercial uses are provided in the area directly next door and have much better access there.
    i. **City states that due to the requirements for commercial and residential in this zone, we can flex into more residential at this property as currently modeled, but the other property would then need to be primarily commercial in nature. Hotel is commercial, but housing won't be allowed at the other property if this one is residential.**
    ii. **IF we want to incorporate more commercial at this property, it could open up more options for the other property.**
8. Parking on the edges of the property will be screened, and the building is set along the street to comply with the municipal code, with all parking behind and under it.
    i. **City would prefer to shift the building to be on the sidewalk at Viking Circle, and let the parking be more open on the other end.**
9. Building massing is set up utilizing modular materials to drive personality and human scale. The building is also articulated to create and take advantage of shadow lines and interest along the sidewalk and roadway. As the

project gains refinement and more detail, I'd like to incorporate the landscaping, because we have some space between the building and sidewalk to augment public use of the streetscape (especially with the trees that are currently in the sidewalk).

a. We are showing this building as 4 levels of living over 1 level of parking. The roof would have occupied interior space, occupiable deck spaces, multiple stairs and elevator access to the roof, and mechanical/support space. Per building code definition, this would be 5 over 1.
    i. **City is amenable to the aesthetic and proportion of the proposed building massing and the way it works into the context. Feel that it is responsible to the manufactured home properties across Lincoln.**
    ii. **Likes the color – look at extending some of that color into other areas. Accent the entry a bit more.**
    iii. **Likes the stepback at the 4th floor and what it does to the scale.**
    iv. **Possibly look at materially changing the two modules of the building to provide some distinction in the length of the build.**
    v. **Possibly look at trying to alter 3rd floor materiality to see if that helps scale further.**
    vi. **Definitely want the main floor entry on Lincoln like shown in the rendering**
    vii. **Talk to the Post Office soon. Mail and Package delivery. Need to probably have a room/hub for packages**
    viii. **Central pod space on each floor would allow for daylight to come in and create community spaces worked into each floor. Take advantage of the views and the wetlands buffer to the west if possible.**
    ix. **City has requested for interpretation as to whether or not living space can cantilever over right-of-way lines. Likely doesn't apply here, but they did inquire just to be sure we have that info early.**

Thanks again for your time and review. Please let me know if there is more information you'll need, or if you have any concerns about what I've outlined above. Looking forward to your thoughts –

Tony

Cushing Terrell

Anthony Houtz AIA, LEED AP
Project Manager | Architect | Associate Principal
406.452.3321 cushingterrell.com
#DesignMeetsYou

Planning and Community Development Department
210 Lottie Street, Bellingham, WA 98225
Phone: (360) 778-8300 Fax: (360) 778-8301 TTY: (360) 778-8382
Email: planning@cob.org Web: www.cob.org

3rd Addendum to Mitigated Determination of Non-significance (MDNS)

Originally issued by the City of Bellingham Planning & Community Development Department for the Lincoln Street Mixed-Use Development on August 28, 2009; 1st Addendum on October 4, 2013; 2nd Addendum August 7, 2015

Date of Notice of 3nd Addendum: July 27, 2018

Case Number: SEP2018-0021

Proponent: Langstan Management, c/o Belcher Swanson Law Firm, 900 Dupont Street, Bellingham, WA 98225, 360-734-6390.

Location: 1199 Lincoln St., east of I-5, west of Lincoln St., south of Lakeway, north of Maple St. in Area 9 of the Puget Neighborhood. Parcel numbers 380331 529392, 524328, 528225 and 380332 015405 and 007385.

Lead Agency: City of Bellingham, Planning & Community Development Department.

This document is the third Addendum to the Mitigated Determination of Non-significance (MDNS), issued on August 28, 2009 (SEP2005-00067), and the environmental checklist for the Lincoln Street Mixed-Use Development. The first Addendum to the MDNS was issued on October 4, 2013 (SEP2013-00033). The second Addendum to the MDNS was issued on August 7, 2015 (SEP2015-00034).

This 3rd Addendum is being provided pursuant to RCW Chapter 43.21C and the authority provided in WAC 197-11-600(4)(c) and the procedures in WAC 197-11-625. It has been determined that the new information considered in this 3rd Addendum does not substantially change the analysis of impacts in the existing environmental checklist for this project (WAC 197-11-706).

Background

On August 28, 2009, the SEPA Official for the Bellingham Planning and Community Development Department (PCDD) issued a MDNS for the Lincoln Street Mixed Use Development (SEP2005-00067). On September 17, 2009, the Director of the PCDD issued for the same project a Consolidated Planned Development and Wetland/Stream Permit (PDC2005-00018 and WET2005-00016, respectively) valid for five years after the issuance date.

In 2013, the Director/SEPA Official issued an addendum to the mitigated threshold determination after determining that the revised proposal, which proposed a phased, mixed-use development including residential units, a student-lifestyle housing project, commercial and associated infrastructure, was consistent with the original approvals if additional mitigation was provided.

In 2015, the Director/SEPA Official issued a second addendum to the mitigated threshold determination after determining that the revised proposal, which includes a 248-unit student-lifestyle housing project in 13 buildings, a commercial building pad, a bridge over Lincoln Creek and improvements to Maple St. for pedestrian and emergency access was consistent with the original approvals if additional mitigation was provided.

The 248-unit student-lifestyle housing project was completed in 2016. Of the 55,000 square feet of allowed general retail floor area, only 6,656 square feet have been provided through the construction of a single retail building in 2013.

The environmental information considered with the addendum includes a modified Environmental Checklist, dated April 11, 2018, all previously identified environmental information considered with the original SEPA document and all subsequent addendums.

Revised Project Proposal
The revised project proposal includes:

1. A 3-story, 90,000 square foot mini-storage facility along the Lincoln Street frontage with associated onsite parking as shown on Exhibit A. The building will include both a mini-storage use and an associated retail component with an overall design that will include street orientation, predominant glazing at street level and on upper levels of the building, a masonry façade and other durable materials, exterior lighting and other improvements to enhance the appearance of the building to the pedestrian generally as shown on Exhibit B.
2. A 248-unit student life style housing proposal in a location shown on Exhibit A. (Completed)
3. 48,880 square feet of general retail in a location shown on Exhibit A. (Partially Completed; 6,656 square feet of general retail has been constructed at 1251 Lincoln Street).

Summary of Revisions
The proposal has changed slightly from the project description included in the 2013 SEPA addendum. The requested revisions include:

- The Traffic Impact Analysis (September 2013) prepared for this proposal identified that a maximum of 55,000 square feet of general retail floor area, in addition to the 248-unit student-lifestyle center, would not generate a traffic volume requiring transportation mitigation or infrastructure improvements beyond normal code requirements.
- The 90,000 sf of ministorage use will generate an equivalent number of vehicle trips as 6,120 sf of general retail use. The overall allowed square footage of commercial/retail floor area should accordingly be reduced to ensure traffic from the development will not generate more than the intended levels identified in TIA.

- Accordingly, this leaves a balance of 48,880 square feet of general retail floor area that can be constructed within the development site area boundaries.
- As detailed in the amended SEPA Checklist, dated April 11, 2018, and as necessary to fulfill the aesthetics section of the checklist, the mini-storage building design will include predominant glazing at street level and on upper levels of the building, a masonry façade, exterior lighting and other improvements to enhance the appearance of the building to the pedestrian and surrounding area.
- Landscaping will be provided around the building, along the street frontage and the parking lot.
- These site and building design elements described in the amended checklist are necessary to bring the proposal into compliance with the overall intent of the associated land use approvals and to create walkable, mixed-use neighborhoods with a variety of businesses and services designed to enhance the pedestrian experience.

As a result of the proposed revision, no additional mitigating conditions are required. All mitigating conditions in the original SEPA determination (SEP2005-00067) and both Addendums (SEP2013-00033 and SEP2015-00034), attached hereto, are still applicable and considered conditions of the Lincoln Street Mixed-use development.

Public and Agency Comment: An addendum contains minor new information that was not included in the original SEPA document. An addendum is appropriate when a proposal is modified but is unlikely to have significant adverse environmental impact. A new environmental checklist for the Lincoln Street Mixed-Use Development was created specifically for this addendum. The proposal contains no new significant changes to the original proposal and is unlikely to have a significant adverse environmental impact.

As encouraged by the state SEPA rules, this addendum is being circulated to property owners within 500 feet of the proposal. Pursuant to WAC 197-11-625, there is not an additional comment period for this addendum. The City will distribute the addendum documents to the agencies with jurisdiction and will post the original SEPA determination and checklist and the SEPA addendums and revised checklists on the City's website at http://www.cob.org. In the search bar, type in 'public notices'. Click on the link at the top of the page. Scroll down to the Mitigated Determination of Non-Significance heading and open the Lincoln St. Mixed-Use Development documents.

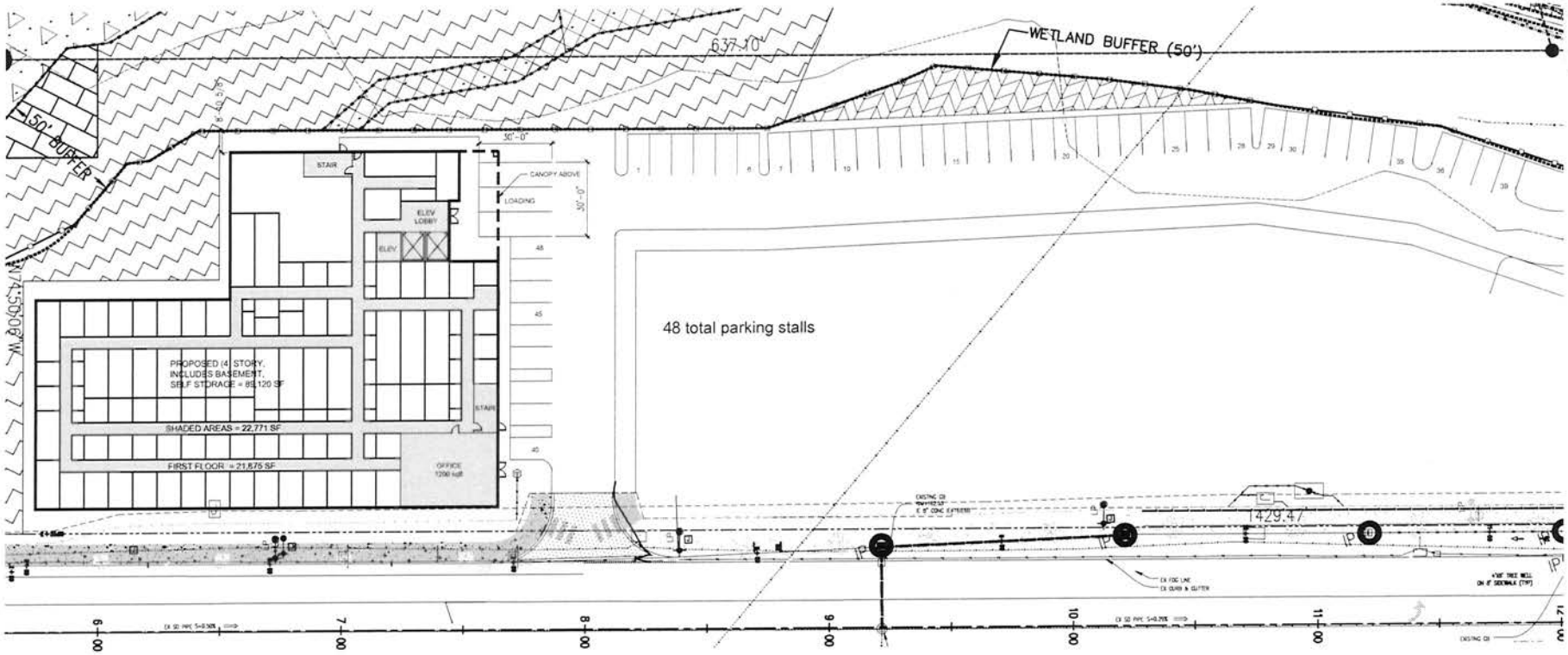
SEPA Responsible Official: Kurt Nabbefeld, Development Services Manager, Planning & Community Development Department, 210 Lottie Street, Bellingham, WA 98225.

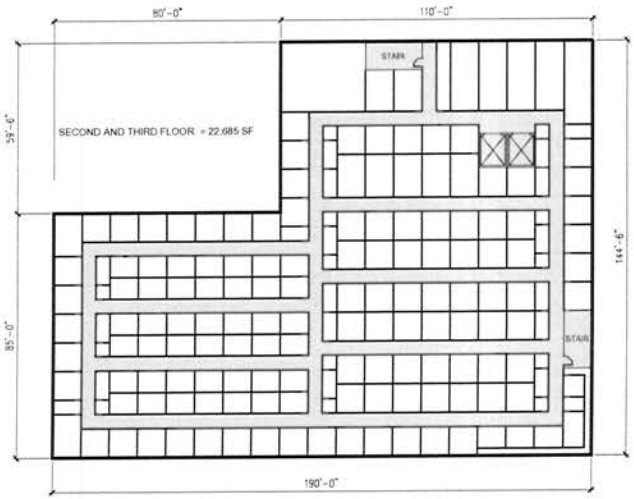
Signature K. Nabbefeld **Date** July 27, 2018

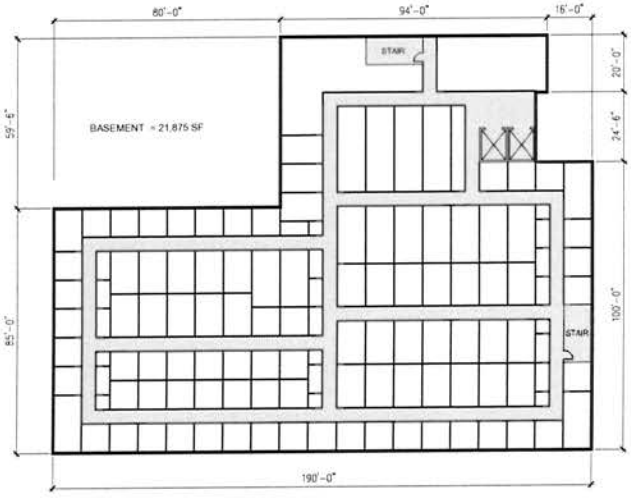
Staff Contact: Kathy Bell, Sr. Planner
Planning & Community Development Department
210 Lottie Street, Bellingham, WA 98225
(360) 778-8347 or kbell@cob.org

EXHIBIT A


FRANKLIN ST
GRANT ST
HUMBOLDT ST
DWARDS ST
OTIS ST
PASCO ST
N SAMISH WAY
5
STUDENT HOUSING
RETAIL
STORAGE
LINCOLN ST
855
845
835
820
865
810
807
1200
1723
1727
1709
1713
1715
1719
1731
1703
1705
1701
839
845
835
827
825
1735
1739
4115
4109







ZERVAS

ARCHITECTURE | INTERIOR DESIGN

zervasgroup.com

9587 REGISTERED ARCHITECT

ANDREW J. KRZYSIK STATE OF WASHINGTON

NOT FOR CONSTRUCTION

PLAN NORTH | TRUE NORTH

SCALE: 1"=20'-0"

LINCOLN STREET SELF- STORAGE

LANGSTAN MANAGEMENT LLC

SITE PLAN CONCEPT

PROJECT No:	201711.01
DRAWN BY:	AK
CHECKED BY:	SA
DATE ISSUED:	04/04/2018

A1.01

SEPA ENVIRONMENTAL CHECKLIST

City staff edits provided in red text
Date: May 4, 2018 by Kathy Bell, Sr. Planner

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

***Instructions for applicants*:** [help]

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:
Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals: [help]

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. BACKGROUND [help]

1. Name of proposed project, if applicable: [help] **Lincoln Street Planned Development – Mini Storage Facility Addendum**

2. Name of applicant: [help] **Langstan Management, c/o Belcher Swanson Law Firm, 900 Dupont Street, Bellingham, WA 98225. 360 734 6390.**

3. Address and phone number of applicant and contact person: [help]
Ali Taysi/AVT Consulting LLC 1708 F Street, Bellingham, WA 98225 360 527 9445

4. Date checklist prepared: [help] **04.11.18**

5. Agency requesting checklist: [help] **City of Bellingham**

6. Proposed timing or schedule (including phasing, if applicable): [help]
Construction Summer/Fall 2018
7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. [help]
Additional commercial development will occur within the approved Lincoln Street Planned Development site. The exact nature of this development is not determined at this time, but it is anticipated that this development will be consistent with the approved site permits and plans and within the scope of the prior SEPA review.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal. [help]
This project contemplates development activity within the boundaries of an approved Planned Development. At the time of Planned Development permitting environmental review occurred and the boundaries of the upland developable areas within the project were defined. These materials are still valid and the proposed project is located within the defined project area. No new environmental information is included at this time.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain. [help]
None

10. List any government approvals or permits that will be needed for your proposal, if known. [help]
City of Bellingham Commercial Building Permit, Public Works Permit, Storm Water Permit and possibly Critical Areas Permit if storm water outfall improvements generate new buffer impacts.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.) [help]
The proposed project is the development of a mini-storage facility at the southern end of the Lincoln Planned Development, along Lincoln Street, in Bellingham WA. The mini storage facility will be 3 stories above grade, with one below grade basement level. The project will include approximately 90,000 square feet of commercial footprint, with 48 new parking stalls and a drive lane, which will connect from the existing curb cut adjacent to the storage facility to the north to the existing primary entrance to the North by Northwest Student Housing complex. The building will include a commercial lobby, with a retail component on the corner (part of the storage use), as well as loading docks, elevators and other improvements. The building will include predominant glazing at street level and on upper levels, masonry façade, lighting and other exterior improvements to enhance the appearance of the building. Landscaping will be provided around the building, along the street front, and within the parking lot. Connection to existing sewer mains, extension of water mains to serve the project, a new fire hydrant and other utility improvements are proposed. The building will be offset from the edge of the existing established critical areas buffers by between 5' and 10'. These buffers are currently demarcated by a split rail fence. The full 15' setback from this buffer edge is not necessary as there are no trees or critical root zones within proximity to the buffer edge in these areas, and the building will be located north of the buffers eliminating shading risk. The proposed project is within the scope of the prior approved permits, but the prior SEPA review completed for the Lincoln Planned Permit did not contemplate the specific use and site development that is proposed, and therefore this SEPA is being completed as an Addendum to the already issued SEPA determinations (SEP2005-67 & SEP2013-33) to analyze the proposed project impacts. The comments in this SEPA are specific to the proposed project action, not the entire Lincoln Street Planned Development.

With the proposed mini-storage use, the remainder of the development site has been or has the opportunity to be developed with:

1. **A 248-unit student life style housing development.**
2. **48,880 square feet of commercial/retail, inclusive of the existing 6,656 square foot commercial building at 1251 Lincoln Street.**

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist. [help]
380331 551329 0000, Lot 2D of the Amended Lincoln Street Retail Condominium, generally located on the northwest side of Lincoln Street south of Fred Meyer and north of the WWU park n' ride facility.

B. ENVIRONMENTAL ELEMENTS [help]

1. Earth

a. General description of the site [help]
☒ Flat ☐ Rolling ☐ Hilly ☐ Steep Slopes ☐ Mountainous
☐ Other Click here to enter text.

b. What is the steepest slope on the site (approximate percent slope)? [help]
3%

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils. [help]
The predominant soils in this area of the site is silt loam and clay.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. [help]
No

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill. [help]
Grading an excavation will occur for the building foundation, internal drive lanes and parking areas. The building will generate approximately 7,000 cubic yards of excavation for the basement and foundation. This material will be removed off site to an approved disposal location. The driveways and parking areas will generate approximately 750 cubic yards of excavation and an equivalent amount of import. Excavated material will be removed off site to an approved disposal location. Road base material will be imported from an approved pit.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. [help]

Limited erosion could occur due to construction activity and exposed soils. After construction activity it is unlikely any erosion could occur.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? [help]
~ 50% of parcel 2D will be covered in impervious surfaces after project construction.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any: [help]
Implementation of a storm water management design, including TESC and SWPPP elements prepared by a qualified professional civil engineer.

2. Air

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known. [help]
During construction emissions to air could occur from construction equipment and vehicles, and from dust. After completion of the project the only emissions to air will be from the buildings HVAC system and from customer vehicles.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. [help]
No.

c. Proposed measures to reduce or control emissions or other impacts to air, if any: [help]
Monitoring of idling construction equipment and vehicles. Installation of a modern HVAC system.

3. Water

a. Surface Water: [help]

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type
and provide names. If appropriate, state what stream or river it flows into. [help]
Yes, Lincoln Creek and associated wetlands are located adjacent to the development area, to the south and east.

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans. [help]
No work is proposed within critical areas or their established buffers, except for a storm water outfall structure. Work will occur within 200' of these critical areas.

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material. [help]
None

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known. [help]
No

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan. [help]
No

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge. [help]
No

b. Ground Water:

1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known. [help]
No

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve. [help]
None, all domestic sewage will be captured in the public sewer system and all storm water will be captured, detained and treated prior to discharge.

c. Water runoff (including stormwater):

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe. [help]
Runoff will be generated from the new building roof and the new vehicle drive lanes and parking areas. Exact quantities of runoff are not known. All runoff will be captured in an engineered storm water system, conveyed to detention and treatment facilities, and then discharged from outfall structures to Lincoln Creek. This water eventually flows to Whatcom Creek, and then Bellingham Bay.

2) Could waste materials enter ground or surface waters? If so, generally describe. [help]
No, all discharge from the site will be controlled, detained and treated.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.
No.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:
Design and implementation of an engineered storm water management system that is consistent with the adopted Department of Ecology storm water management manual.

4. Plants [help]

a. Check the types of vegetation found on the site: [help]

☒ deciduous tree: alder, maple, aspen, other

☒ evergreen tree: fir, cedar, pine, other
☒ shrubs
☒ grass
☒ pasture
☐ crop or grain
☐ orchards, vineyards or other permanent crops.
☒ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
☐ water plants: water lily, eelgrass, milfoil, other
☐ other types of vegetation

b. What kind and amount of vegetation will be removed or altered? [help]
The only vegetation within the development area is scrub pasture grasses and shrubs. All of this vegetation will be removed.

c. List threatened and endangered species known to be on or near the site. [help]
None known.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: [help]
Landscaping will be provided around the building, along the street front, and around and within the parking areas. All buffer areas, which have previously been enhanced with plantings, will be protected and maintained .

e. List all noxious weeds and invasive species known to be on or near the site.
None

5. Animals

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. Examples include: [help]
birds: **hawk**, heron, eagle, **songbirds**, other:
mammals: **deer**, bear, elk, beaver, other:
fish: bass, salmon, trout, herring, shellfish, other _____
Click here to enter text.

b. List any threatened and endangered species known to be on or near the site. [help]
None known

c. Is the site part of a migration route? If so, explain. [help]
The entire area is part of the Pacific Flyway

d. Proposed measures to preserve or enhance wildlife, if any: [help]
Continued preservation and protection of the existing critical areas, buffers and enhanced mitigation areas developed with the Lincoln Street Planned Development.

e. List any invasive animal species known to be on or near the site.
None known

6. Energy and natural resources

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc. [help]
The project will utilize gas and/or electricity for heat and electricity for lighting.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe. [help]
No

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any: [help]
The project will meet State energy code requirements and will utilize modern construction techniques and materials.

7. Environmental health

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe. [help]
No

1) Describe any known or possible contamination at the site from present or past uses.
None

2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.
None

3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.
None, although it is possible that individuals storing things in the storage units could store a toxic or hazardous chemical unbeknownst to the owners. Efforts will be made to monitor this.

4) Describe special emergency services that might be required.
None

5) Proposed measures to reduce or control environmental health hazards, if any:
None

b. Noise

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? [help]
Traffic

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site. [help]
During construction noise from equipment. During occupancy traffic noise.

3) Proposed measures to reduce or control noise impacts, if any: [help]

None

8. Land and shoreline use

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe. [help]
The site is currently vacant but other parcels within the Lincoln Street Planned Development have been developed with residential and commercial/retail uses. The proposal will not impact adjacent uses.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use? [help]
No

1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:
No

c. Describe any structures on the site. [help]
None

d. Will any structures be demolished? If so, what? [help]
No

e. What is the current zoning classification of the site? [help]
Planned Commercial

f. What is the current comprehensive plan designation of the site? [help]
Commercial

g. If applicable, what is the current shoreline master program designation of the site? [help]
N/A

h. Has any part of the site been classified as a critical area by the city or county? If so, specify. [help]
Yes, there are portions of the property that are encumbered with critical areas (stream and wetlands), and their buffers.

i. Approximately how many people would reside or work in the completed project? [help]
The project would employ between 5-10 people.

j. Approximately how many people would the completed project displace? [help]
None

k. Proposed measures to avoid or reduce displacement impacts, if any: [help]
None

L. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: [help]
The project is the development of a mini storage facility within an approved commercial development. The use is an allowed use, and has been designed to meet all applicable development regulations and to be consistent with the prior approved land use permits for the overall site.

m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any:
N/A

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. [help]
None

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing. [help]
None

c. Proposed measures to reduce or control housing impacts, if any: [help]
N/A

10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed? [help]
~ 35'

b. What views in the immediate vicinity would be altered or obstructed? [help]
No views will be obstructed. Views from the mobile home park across Lincoln Street will be altered in the immediate vicinity of the project.

c. Proposed measures to reduce or control aesthetic impacts, if any: [help]
The building has been tastefully designed and will include exterior building materials, lighting and landscaping that will insure it is compatible with the surrounding development. The proposed parking will be located along the back edge of the development area, insuring that future development pads will front Lincoln Street, improving the street façade and pedestrian experience in the area.

11. Light and glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur? [help]
Light from building windows and vehicle headlights.

b. Could light or glare from the finished project be a safety hazard or interfere with views? [help]
No

c. What existing off-site sources of light or glare may affect your proposal? [help]
None

d. Proposed measures to reduce or control light and glare impacts, if any:
Downlighting on all building lights.

12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity? [help]
There are various trails and parks in the general vicinity, including the Civic Field complex to the north, with swimming, hiking, indoor and outdoor sports fields and other recreational improvements.

b. Would the proposed project displace any existing recreational uses? If so, describe. [help]
No

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: [help]
None

13. Historic and cultural preservation

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers located on or near the site? If so, specifically describe. [help]
No

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources. [help]
No

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc. [help]
A cultural resource assessment was completed for the entire Lincoln Street Planned Development during initial permitting. This assessment found no significant historic resources.

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.
None

14. Transportation

a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any. [help]
The site is served by Lincoln Street, Lakeway to the north, and Samish Way to the south. An interchange for I5 is located just to the south.

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop? [help]
Yes. There is a WTA bus line on Lincoln Street, and immediately south is a bus stop and the WWU park n' ride facility.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? [help]
48 new stalls. None eliminated.

d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private). [help]
No, only internal drive lanes.

e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe. [help]
No

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates? [help]
It is unknown the exact vehicular trips per day that will be generated from the mini storage facility. Generally, trip generation from this type of facility is very low at all hours, including during pm peak.

- The referenced TIA prepared for this proposal identified that a maximum of 55,000 square feet of commercial floor area, in addition to the 248-unit student-lifestyle center, would generate a traffic volume that would not require transportation mitigation.
- The 90,000 sf of ministorage use will generate an equivalent number of vehicle trips as 6,120 sf of commercial/retail use.
- This leaves a balance of 48,880 sf of commercial/retail floor area that can be constructed with the developments boundaries.

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.
No

h. Proposed measures to reduce or control transportation impacts, if any: [help]
Payment of traffic impact fees. Significant road frontage improvements were already made with the Lincoln Street Planned Development. These improvements were based on a professional Traffic Impact Analysis and a second follow up Traffic Impact Analysis, which contemplated significant residential and retail commercial development within the overall project boundary. The proposed mini storage traffic impacts are within the scope studies in the prior TIA's.

15. Public services

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe. [help]
No

b. Proposed measures to reduce or control direct impacts on public services, if any. [help]
None

16. Utilities

a. Check utilities currently available at the site: [help]
☒ electricity ☒ natural gas ☒ water ☒ refuse service ☒ telephone ☒ sanitary sewer

☐ septic system ☐ other Click here to enter text.

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed. [help]

The project will require connection to electricity, gas, water, sewer and other dry utilities (phone, cable, fiber optic, etc...). All these utilities are in the abutting street, requiring limited extension.

C. SIGNATURE [HELP]

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: _____Ali Taysi_____

Name of signee Ali Taysi

Position and Agency/Organization Principal/AVT Consulting LLC

Date Submitted: 04.11.18

PLANNING AND COMMUNITY DEVELOPMENT DEPARTMENT
210 Lottie St., Bellingham, WA 98225
Telephone: (360) 778-8300 Fax: (360) 778-8302

Addendum to Mitigated Determination of Non-significance (MDNS)

Originally issued by the City of Bellingham Planning & Community Development Department

On August 28, 2009 for the

Lincoln Street Mixed-Use Development

Date of Notice of Addendum: October 4, 2013

Case Number: SEP2013-00033

Proponent: Langstan Management c/o Belcher Swanson Law Firm, 900 Dupont St., Bellingham, WA 98225, (360)734-6390.

Location: 1199 Lincoln Street, east of I-5, west of Lincoln Street, south of Lakeway Drive, north of Maple Street, in Area 9 of the Puget Neighborhood. Parcel numbers 380331 524218, 380331 538220, and 380332 006373.

Lead Agency: City of Bellingham, Planning & Community Development Department.

This document is an Addendum to the Mitigated Determination of Non-significance (MDNS), issued on August 28, 2009 (SEP2005-00067), and the environmental checklist for the Lincoln Street Mixed-Use Development. This Addendum is being provided pursuant to RCW Chapter 43.21C and the authority provided in WAC 197-11-600(4)(c) and the procedures in WAC 197-11-625. It has been determined that the new information in this Addendum does not substantially change the analysis of impacts in the existing environmental checklist for this project (WAC 197-11-706).

Public and Agency Comment: An addendum contains minor new information that was not included in the original SEPA document. An addendum is appropriate when a proposal is modified but is unlikely to have significant adverse environmental impact. An environmental checklist was created for the Lincoln Street Mixed-Use Development and is attached to this document. The proposal contains no new significant changes to the original proposal and is unlikely to have a significant adverse environmental impact.

Addendums do not require a public comment period; public comments may be made on future permits for this project. The City will distribute the Addendum documents to the agencies with jurisdiction and will post the original SEPA determination and checklist and the SEPA addendum and revised checklist on the City's website. Go to http://www.cob.org. In the search bar, type in 'public notices'. Click on the link at the top of the page. Scroll down to the Mitigated Determination of Non-Significance heading and open the Lincoln St. Mixed-Use Development documents.

Background
On August 28, 2009, the Director/SEPA Official for the Bellingham Planning and Community Development Department (PCDD) issued a Mitigated Determination of Non-Significance (MDNS) for the Lincoln Street Mixed Use Development (SEP2005-00067). On September 17, 2009, the Director issued for the same project a Consolidated Planned Development and Wetland/Stream Permit (PDC2009-00018 and WET2005-00016, respectively) valid for five years after the issuance date. In 2013, the applicant made minor revisions to the proposal that the Director determined to be consistent with the original approvals.

Project Proposal
The project proposal is a phased, mixed-use development on a 24.3-acre property as shown on Exhibit A. Phase 1 includes 175 residential units in 4 buildings, a single or multi-tenant one-story commercial building, constructing a bridge over Lincoln Creek and widening Maple St. for site access, removing a 220-foot culvert in Lincoln Creek and restoring this reach of Lincoln Creek, and relocating 360 feet of Lincoln Creek for the construction of Maple St. (the applicant is seeking a variance from street width requirements). Phase 2 includes a 216-unit student-lifestyle housing project in 10 buildings and a commercial building pad. Phase 3 includes additional commercial development along Lincoln St. The tallest buildings will be up to 5 stories; design review is required. Total commercial space proposed is 55,000 square feet. Public infrastructure, including streets, sidewalks, water, sewer and stormwater management, will be installed according to city development standards and processes. Water lines up to 12" in diameter will also be extended onto the site.

Lincoln Creek and the two wetlands onsite are subject to BMC 16.50; stream and wetland buffers are 50 feet. Other project components include 0.35 acres of wetland impacts and 0.31 acres of wetland "paperfill", 0.39 acres of wetland buffer impacts, 1.2 acres of buffer enhancement and 1.8 acres of wetland mitigation including grading for wetland creation all to be accomplished on site in a preliminary phase; approximately 4 acres of site vegetation removal also to be done in the preliminary phase. The preliminary phase is intended to complete all the wetland and wetland buffer mitigation for the entire project. The applicant received a final Nationwide Permit (NWS-2007-1706) dated 9/30/2013 from the Army Corps of Engineers. If other wetland buffer impacts occur in future phases, they will be reviewed in each phase and additional mitigation will be required per phase where/if necessary. Fencing, signage, and a conservation easement are required for the remaining wetland, stream, and buffers. The applicant is seeking additional approvals from state agencies for regulated activities.

Summary of Revisions
The proposal has changed slightly from a "lifestyle center" that included commercial space, residential condos, parking structures, and a 6-story hotel to a plan with "student-lifestyle housing" units, commercial space, and standalone residential units. The overall footprint of the development, including wetland/stream buffers, will be substantially similar. Other revisions from the original proposal include phasing the development, removing the culvert in Lincoln Creek, relocating Lincoln Creek along Maple Street, seeking a street width variance for Maple Street, and providing for possible future wetland buffer impacts to be mitigated by phase. A new traffic impact analysis was also conducted and the report shows an overall reduction in trips.

As a result of the revisions, **additional mitigation conditions** are required. In addition to the mitigating conditions in the original SEPA determination (SEP2005-00067), the new mitigating conditions include:

1. Prior to any land disturbance in each development phase, a grading, clearing, and stormwater plan shall be submitted to the City for review and approval. Grading, infrastructure, and new construction shall be designed to avoid new impacts to the wetland and stream buffer. Land disturbance shall not occur until the grading, clearing, stormwater plan is approved through

a Clearing Permit and Stormwater Permit issued together or approved as part of a Building Permit.

2. Prior to the commencement of each phase, a pre-construction site visit shall be held with City staff, the applicant, and contractors to review surveyed and staked clearing and grading limits. Clearing and grading limits shall remain in place and functioning through full construction of the phase or until the PCDD issues written authorization to remove them.

3. Prior to any land disturbance in each development phase, if direct or indirect impacts are proposed from construction or construction-related activities, an Addendum to the Final Wetland and Stream Mitigation Plan shall be submitted to the PCDD for review and approval. The focus of the mitigation plan shall be to protect wetland and stream functions. Prior to any land disturbance, an additional surety shall be provided for the additional mitigation if the PCDD deems it necessary.

4. Mitigation for any proposed future impacts shall be provided within six months of the impact and in accordance with the Addendum to the Final Wetland and Stream Mitigation Plan as approved by the PCDD.

5. Prior to any land disturbance in each phase, a post-development stream and wetland function analysis shall be done to ensure that there is no further loss of function. This analysis shall consider all temporary and permanent wetland, steam, and buffer impacts and the effect on the functions of each feature. If functional loss is anticipated, it shall be addressed in the Addendum to the Final Wetland and Stream Mitigation Plan in for each phase.

6. Prior to any land disturbance for Phase 1, a conservation easement for the wetland, stream, and buffers being preserved and/or mitigated, shall be reviewed and approved by the City and shall subsequently be recorded at the Whatcom County Auditor's office.

7. The mitigation monitoring period shall commence after all the mitigation grading and plantings are installed for the preliminary-phase mitigation work, for the relocation of Lincoln Creek, and the removal of the culvert from Lincoln Creek.

8. Mitigation measures from the Traffic Impact Analysis (TranspoGroup, September 2013) shall be implemented as detailed on page 21 of the report included with the cover page as Exhibit B (the full TIA can be found on the City's website referenced above). The timing of the implementation of the mitigation measures shall be determined by the City Public Works Dept. The measures include installation of ADA-compliant sidewalks along Lincoln and Maple Streets property frontages; installation of ADA compliant ramps and crosswalks at the Maple Street/Lincoln Street intersection to provide a continuous ADA compliant walking route to and from the WWU Park-and-Ride. Construction of this intersection should be coordinated with the City Public Works Dept. such that the wiring for a future traffic signal can be installed; transportation impact fees will be assessed for development based on rates in effect on the date of building permit application.

SEPA Responsible Official: Jeff Thomas, Director, Planning & Community Development Department, 210 Lottie Street, Bellingham, WA 98225.

Signature _____ **Date** 10-4-2013

Staff Contact: Kim Weil, Environmental Planner
Planning & Community Development Department
210 Lottie Street, Bellingham, WA 98225
(360) 778-8356, or kweil@cob.org

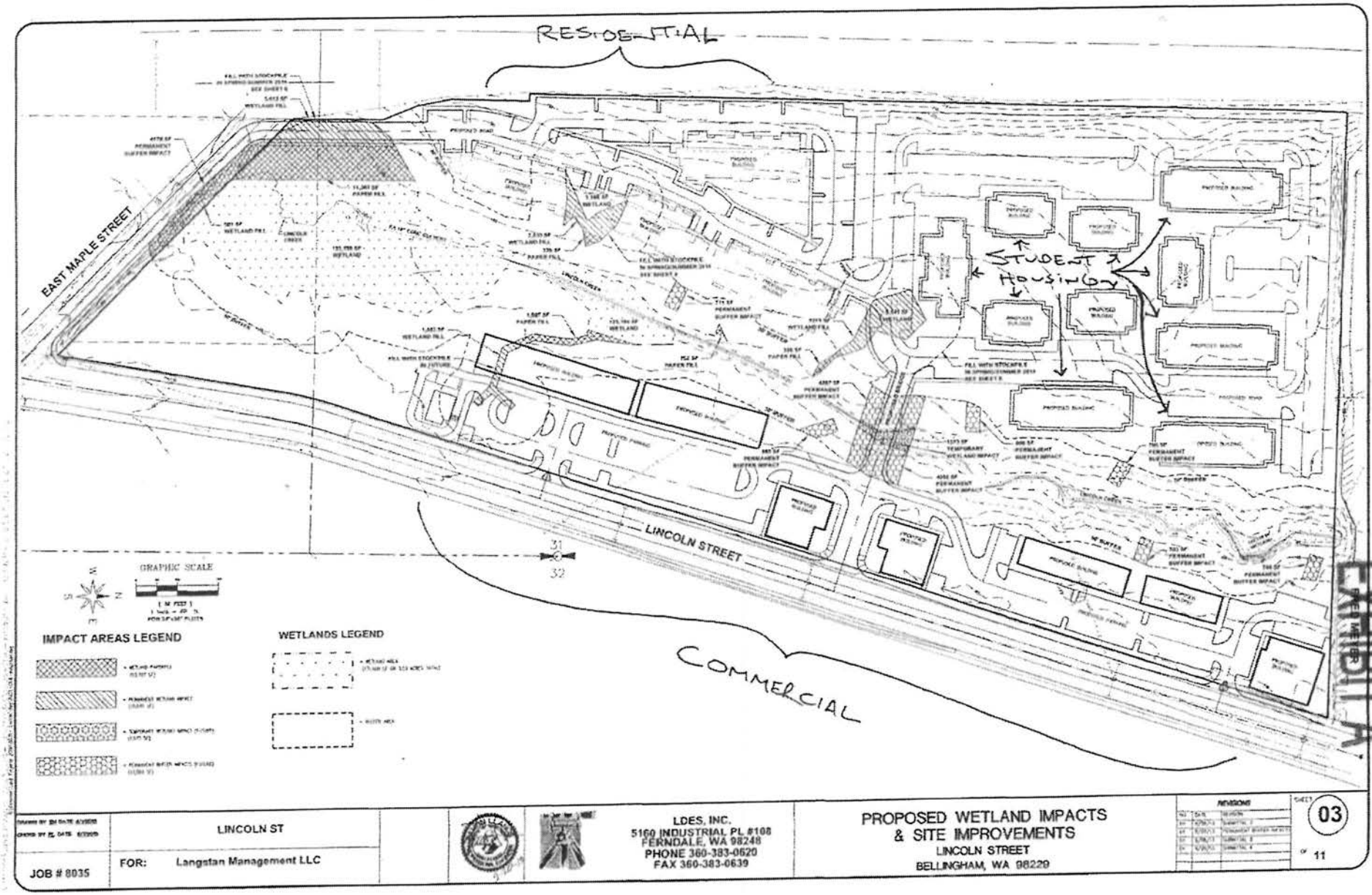


EXHIBIT A

JOB # 8035	FOR: Langstan Management LLC	LINCOLN ST	LDES, INC. 5160 INDUSTRIAL PL #108 FERNDALE, WA 98248 PHONE 360-383-0620 FAX 360-383-0639	PROPOSED WETLAND IMPACTS & SITE IMPROVEMENTS LINCOLN STREET BELLINGHAM, WA 98229

REVISIONS

SHEET 03 OF 11

EXHIBIT B

Transportation Impact Analysis

LINCOLN STREET DEVELOPMENT
BELLINGHAM, WA

Prepared for:
Stebner Real Estate, Inc.

September 2013

Prepared by:

transpoGROUP

11730 118th Avenue NE, Suite 600
Kirkland, WA 98034-7120
Phone: 425-821-3665
Fax: 425-825-8434
www.transpogroup.com

08135.01

Chapter 4. Summary and Mitigation

The following summarizes the analysis presented in this report.

- The proposed project would include 393 multi-family residential units, and 55,000 square feet of general retail. The project would be completed and occupied by 2017. The proposed project would generate approximately 241 net new trips during the weekday PM peak hour.
- The I-5 ramps at King Street and Fielding Avenue would operate at LOS F in the 2017 and 2023 horizon year during the weekday PM peak hour with or without project traffic. WSDOT's long-term master plan would improve these interchanges.
- The north and south site access driveways would operate at LOS B during the weekday PM peak hour 2017 and 2023 conditions and would meet the City's requirements for access spacing.
- The primary access driveway would operate at LOS C during the PM peak hour and would experience a 95th percentile queue for vehicles exiting the site of less than one vehicles, with minimal queues along Lincoln Street for both 2017 and 2023 conditions.
- The westbound movement of the intersection of Maple Street/Lincoln Street would operate at LOS F for 2017 with-project conditions and 2023 without- and with-project conditions. The analysis indicates that with or without the project improvements would be needed at this intersection as traffic volumes increase. The City will monitor growth at this location to determine when improvements may be necessary.
- The eastbound movement of the intersection of Maple Street/Lincoln Street would operate at LOS D in 2017 with the project traffic and LOS E in 2023 with the project. No safety issues are present at the intersection.
- The development would provide an environment to encourage use of alternative modes including pedestrian and bicycle facilities and the ability to accommodate transit on-site. In addition, the development is located an approximately 10-minute walk from the Lincoln Creek Transportation Center.

The following mitigation measures are recommended:

- Installation of ADA compliant sidewalks along the Lincoln and Maple Streets property frontages.
- Installation of ADA compliant ramps and crosswalks at the Maple Street/Lincoln Street intersection to provide a continuous ADA compliant walking route to and from the WWU Park-and-Ride. Construction at this intersection should be coordinated with the City of Bellingham Public Works such that the wiring for a future traffic signal can be installed.
- Transportation Impact Fees will be assessed for development based on rates in effect on the date of building permit application. The current fee is $1,925 per PM peak hour trip. Based on the anticipated trip generation, the preliminary traffic impact fee estimate is $463,925.

PLANNING AND COMMUNITY DEVELOPMENT DEPARTMENT
210 Lottie St., Bellingham, WA 98225
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2nd Addendum to Mitigated Determination of Non-significance (MDNS)

Originally issued by the City of Bellingham Planning & Community Development Department

On August 28, 2009 and Addendum on October 4, 2013

for the Lincoln Street Mixed-Use Development

Date of Notice of 2nd Addendum: 8/7/15

Case Number: SEP2015-00034

Proponent: Craig Parkinson, Cascade Engineering Group, 19 Grand Avenue, Ste. D, Bellingham, WA 98225, (360) 306-8161.

Location: 1199 Lincoln St., east of I-5, west of Lincoln St., south of Lakeway, north of Maple St. in Area 9 of the Puget Neighborhood. Parcel numbers 380331 529392, 524328, 528225 and 380332 015405 and 007385.

Lead Agency: City of Bellingham, Planning & Community Development Department.

This document is the second Addendum to the Mitigated Determination of Non-significance (MDNS), issued on August 28, 2009 (SEP2005-00067), and the environmental checklist for the Lincoln Street Mixed-Use Development. The first Addendum to the Mitigated Determination of Non-significance (MDNS) was issued on October 4, 2013 (SEP2013-00033). This 2nd Addendum is being provided pursuant to RCW Chapter 43.21C and the authority provided in WAC 197-11-600(4)(c) and the procedures in WAC 197-11-625. It has been determined that the new information in this 2nd Addendum does not substantially change the analysis of impacts in the existing environmental checklist for this project (WAC 197-11-706).

Public and Agency Comment: An addendum contains minor new information that was not included in the original SEPA document. An addendum is appropriate when a proposal is modified but is unlikely to have significant adverse environmental impact. An environmental checklist was created for the Lincoln Street Mixed-Use Development and is attached to this document. The proposal contains no new significant changes to the original proposal and is unlikely to have a significant adverse environmental impact.

Addendums do not require a public comment period. The City will distribute the Addendum documents to the agencies with jurisdiction and will post the original SEPA determination and checklist and the SEPA addendum and revised checklist on the City's

website. Go to http://www.cob.org. In the search bar, type in 'public notices'. Click on the link at the top of the page. Scroll down to the Mitigated Determination of Non-Significance heading and open the Lincoln St. Mixed-Use Development documents.

Background

On August 28, 2009, the Director/SEPA Official for the Bellingham Planning and Community Development Department (PCDD) issued a Mitigated Determination of Non-Significance (MDNS) for the Lincoln Street Mixed Use Development (SEP2005-00067). On September 17, 2009, the Director issued for the same project a Consolidated Planned Development and Wetland/Stream Permit (PDC2005-00018 and WET2005-00016, respectively) valid for five years after the issuance date. In 2013, the Director/SEPA Official issued an addendum to the mitigated threshold determination after determining that the revised proposal, which proposed a phased, mixed-use development including residential units, a student-lifestyle housing project, commercial and associated infrastructure, was consistent with the original approvals if additional mitigation was provided.

Revised Project Proposal

The project proposal is a phased, mixed-use development on a 24.3-acre property. Phase 1 includes 248-unit student-lifestyle housing project in 13 buildings, a commercial building pad, constructing a bridge over Lincoln Creek and improving Maple St. for pedestrian and emergency access. The remaining development will be phased and include commercial development along Lincoln St. The tallest residential building will be up to 4 stories; design review is required. Total commercial space proposed is 55,000 square feet. Water lines up to 12" in diameter will be extended onto the site.

Summary of Revisions

The proposal has changed slightly from the project description included in the 2013 SEPA addendum. The requested revisions include:

- Overall unit reduction of 145 residential units from the previously approved combined total of 393 residential units. The residential component of the development has been consolidated and now consists only of student-lifestyle housing units. The student-lifestyle housing component will contain 248 units in 13 buildings with a mix of 2 and 3-bedroom units.
- Elimination of the vehicular access from Maple Street. All vehicular access to the student-lifestyle housing component will be taken from Lincoln Street, over a proposed box culvert in Lincoln Creek.
- Overall reduction in vehicle trips as a result of the decreased residential unit count. A new traffic impact analysis was not required since the previous traffic report prepared by TRANSPO (September 2013) showed an overall reduction in vehicular trips for the previous revisions.
- Removal of an additional culvert in Lincoln Creek.
- Reduced development footprint of the residential portion of the proposal resulting in less critical area impact.
- The proposal no longer includes the relocation of any portion of Lincoln Creek that resulted from the proposed design of the Maple Street improvements.

As a result of the revisions, no additional mitigating conditions are required. All mitigating conditions in the original SEPA determination (SEP2005-00067) and the Addendum (SEP2013-00033) are still applicable and considered conditions of the Lincoln Street Mixed-use development.

SEPA Responsible Official: Kurt Nabbefeld, Senior Planner, Planning & Community Development Department, 210 Lottie Street, Bellingham, WA 98225.

Signature _____ **Date** 8/7/15

Staff Contact: Kathy Bell, Planner
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