



Whatcom Chapter

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

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Mr. Dennis Rhodes
Planning Department
City of Ferndale
P. O. Box 936
Ferndale, WA 98248

Re: Environmental Impact Statement (EIS) Pioneer Plaza

Dear Mr. Rhodes:

I understand that your department has been working on the EIS for Pioneer Plaza. Futurewise Whatcom shares your desire that the EIS be as thorough as possible; comprehensive in its treatment of a broad range of possible economic, environmental, and social impacts; and cover both short- and long-term impacts of this proposed development. To that end, I want to share a few of our initial concerns about traffic, stormwater management, and other issues related to this proposal:

Traffic:

- The analysis of potential traffic patterns should consider Pioneer Plaza's impact on the entire road system, especially Smith Road, Axton Road, and Main Street. The level of service (LOS) for these roads should not fall below acceptable standards. That is, traffic flows associated with the proposed development should not be permitted to increase congestion beyond current levels.
- Many accidents have occurred at the intersection of SR-539 (Guide Meridian) and Smith Road. The EIS should analyze mitigation options to ensure that more accidents do not occur here as Pioneer Plaza's occupancy increases over time.
- The traffic study should consider how the accident rates on Smith Road, Axton Road, and Main Street will change as a result of this proposed development.
- Ferndale, Whatcom County, and the State of Washington need flexibility in assessing alternative ways to mitigate the increased traffic associated with Pioneer Plaza. In particular, if traffic increases after the development is in place and additional mitigation is needed, the developer should pay a proportionate share of the expense for such mitigation.
- If during peak hours of operation the LOS drops below the city's acceptable standard of LOS D, the occupancy level of Pioneer Plaza should be reduced.

Futurewise Whatcom Steering Committee
Rick Dubrow, Lynnea Flarry, Nick Hartrich, Eric Hirst, Greg Kirsch,
Charlie Maliszewski, Tris Shirley, Dan Warner

Stormwater Management:

- The final stormwater plan should include a silt fence that is inspected and maintained in an on-going manner to prevent silt and other pollutants from entering the wetlands, especially those which are the highest rated and right next to the development.
- The final management plan should include measures to control oil and other contaminants from motor vehicles from entering wetlands and streams.
- Provisions need to be made to properly treat any herbicide, pesticide, or fertilizer used on the site because the stormwater that might contain them will be released into Barrett Lake, Silver Creek, Deer Creek, as well as adjacent wetlands.
- An on-going monitoring program should be required to ensure that released treated stormwater does not negatively impact the wetlands and should also monitor siltation, water level and flow, and wildlife.

Other Concerns:

- Landscaping and lighting plans should comply with the Leadership in Energy and Environmental Design (LEED) standards for new commercial development to promote energy efficiency and prevent light from negatively affecting adjacent properties.
- Ferndale has committed to reduce emissions of greenhouse gases. Because the proposal is estimated to induce 29,578 trips per day, the EIS should analyze ways to reduce motor-fuel consumption and the associated release of carbon dioxide (as well as other air pollutants). The EIS should also consider the fuel and electricity used by the buildings in the development for heating, air conditioning, hot water, and so on.
- Because this project is at a low elevation, the EIS should analyze the potential for flooding.
- The site has been classified as having moderate aquifer susceptibility with some areas of high susceptibility. The EIS should address the potential impacts of Pioneer Plaza on groundwater quality and flows.
- The SEPA checklist (Section V-a) notes that eagles and salmon have been observed on or near the property. Since both are considered to be threatened species, the potential effects of the new development on habitat should be addressed.
- Noise levels are of concern, especially with almost 30,000 cars per day anticipated. This could well exceed the noise generated by I-5, and should be addressed. Also, the issue of noise impacting neighbors to the east, west, and north should also be studied in greater depth, along with various mitigation methods.
- Since Category II wetlands are very difficult to replace, Wetland A (Category II) should not be even partially displaced by this development. Most certainly it should not abut a pet area.
- The EIS should include a detailed analysis of the costs for public services (e.g., fire, emergency medical, police, health care, schools, parks, and libraries) as a result of this development, and the extent to which the tax revenue this development generates offsets these costs. More generally, the EIS should include a comprehensive benefit/cost analysis that compares the public costs of this new development (particularly for infrastructure) with the likely tax revenues from the development.
- Landscaping should be limited to plants native to Western Washington to minimize the need for additional chemicals, as well as providing a greater survival rate of the plants. Currently, many of the species planned for roadway and intersection plantings are nonnative.

- WAC 197-11-060(4)(d) provides that in the EIS, a proposal like Pioneer Plaza include direct and indirect, (including future) impacts caused by the proposal. Such impacts include, but are not limited to resulting growth, traffic, environmental impacts, etc. caused by Pioneer Plaza, as well as the probability that this development will set a precedent for future actions. The EIS must consider the effects that will be generated by secondary growth spawned by this development, too. For such a project, it requires analysis beyond the year the project opens and further requires analysis of the impacts of the additional growth created by this project.

On behalf of the Whatcom County chapter of Futurewise, I thank you for considering our concerns about the proposed Pioneer Plaza development. Like you, we want to be sure that this—and all new developments—meet the needs of and benefit today’s citizens.

Please let me know if you have any questions or comments about the issues raised in this letter. Please also let me know when the EIS will be available for public review.

Thank you.