



## Planning and Community Development Department

210 Lottie Street, Bellingham, WA 98225

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### **Determination of Non-Significance (DNS) Use of Phased SEPA Determination (WAC197-11-060(5))**

**SUB2022-0021/VAR2022-0007/CAP2022-0018/SEP2022-0024**

**Date of Issuance of Threshold Determination:** 6/20/2023

**Project Name:** Plat of Queen Mountain

**Project Description:** The phased development of approximately 36 acres located in Area 12 of the King Mountain Neighborhood through the land division process for a proposal commonly referred to as Queen Mountain. The preliminary plat proposes 11 single-family cluster lots and 5 tracts for future development of multifamily and infill housing. Development of the multifamily and infill housing tracts are not proposed at this time and will require additional land use decisions requiring public comment and SEPA review.

Public infrastructure necessary to serve the preliminary plat will be reviewed for consistency with the comprehensive plan and the municipal code. The Proposal includes the dedication of land for and/or construction of public infrastructure, including streets, sidewalks, stormwater management facilities and trails. Phased construction of the required infrastructure is anticipated.

The site contains critical areas regulated by the Bellingham Municipal Code. Impacts to critical areas are proposed with 1,102 square feet of direct wetland impact, 49,775 square feet of indirect wetland impact and 66,575 square feet of buffer impact. Mitigation for these impacts is proposed to occur within the boundaries of the preliminary plat.

Approximately 60-percent of the site's forest cover is proposed to be retained. Additional analysis will be necessary to determine appropriate tree retention and replacement requirements for the remaining portion of the site pursuant to BMC 16.60.080.

A variance application requesting to reduce the residential street standards serving the proposed residential development and the abutting rights of way has been submitted and will be considered by the hearing examiner concurrently with the preliminary plat.

**Project Location:** 4175 Iron Gate Road / Area 12, King Mountain Neighborhood; Residential Single, Detached/Cluster, mixed with a 7,200 square foot overall density. **PIN** 380308 336210.

**Proponent:** Nick Palewicz, PE, Freeland and Associates, 220 W Champion Street, Ste. 200, Bellingham, WA 98225 for Queen Mountain Homes, 4638 Celia Way, Unit 202, Bellingham, WA 98226.

**Lead Agency:** City of Bellingham, Planning and Community Development Department (PCDD)

## Environmental Information Considered:

- SEPA Checklist, prepared by Nick Palewicz, dated March 30, 2022 and revised February 16, 2023
- Critical Areas Report (MES, January 29, 2021)
- Mitigation Plan (MES, March 28, 2022; revised February 24, 2023)
- Wetland Hydroperiod Analysis (MES, April 13, 2022)
- Tree Risk Assessment (TGI Arboriculture Services, February 10, 2022)
- Geotechnical Report (GEOTEST, September 3, 2020; revised March 15, 2023)
- Analytical Sampling Results (GEOTEST, September 3, 2020)
- Stormwater Dispersion Addendum (GEOTEST, April 8, 2022)
- Preliminary Stormwater Site Plan (Freeland, March 2022; revised February 2023)
- Traffic Impact analysis (GTC, December 2021)

This threshold determination is a phased SEPA determination pursuant to WAC 197-11-060 (5) and contemplates only those impacts associated with Phase II. Additional studies and subsequent environmental review may be necessary for future phases. Phased review assists agencies and the public to focus on issues that are ready for decision and excludes from consideration issues already decided or not yet ready for a SEPA determination.

The lead agency has determined that the requirements for environmental analysis, protection, and mitigation measures have been adequately addressed in the development regulations and comprehensive plan adopted under chapter [36.70A](#) RCW, and in other applicable local, state, or federal laws or rules, as provided by RCW [43.21C.240](#) and WAC 197-11-158. Our agency will not require any additional mitigation measures under SEPA. This decision was made after reviewing a completed environmental checklist on file with the lead agency. This information is available to the public upon request.

- This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this Proposal for 14 days from the date of issuance. Anyone wishing to comment on this threshold determination is invited to submit written comments to the PCDD by **5:00pm on 7/5/2023**.

**Appeal Rights:** Pursuant to BMC 16.20.210(D), there is no administrative appeal of this environmental determination.

### Staff Contact:

Kathy Bell, Senior Planner  
kbell@cob.org or 360-778-8347  
Planning and Community Development Department  
210 Lottie Street - Bellingham, WA 98225

**Responsible Official:**

Kurt Nabbefeld, Development Services Manager  
Planning and Community Development Department  
210 Lottie Street, Bellingham, WA 98225

A handwritten signature in blue ink, appearing to read "K. Nabbefeld". The signature is written in a cursive style with a large initial "K" and "N".

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Signature

## **ENVIRONMENTAL RECORD SUPPLEMENTAL REPORT**

This report contains supplemental information to the environmental review of the Proposal known as the Queen Mountain preliminary plat. This report is an analysis of the application materials, including all environmental documents referenced in this report, and public comment received in response to the issuance of the Notice of Application (dated April 12, 2023).

### **BACKGROUND**

In March 2009, the subject site was annexed into the City by Ordinance No. 2008-12-106 as part of the King Mountain Neighborhood with a residential-single land use and zoning designations, with allowance for multifamily housing.

Land use applications for the Proposal, consisting of a preliminary plat, subdivision variance, critical areas and design review, were submitted on May 11, 2022. The applications were deemed complete on June 8, 2022. In response to a notice requesting additional information, issued on September 14, 2022, the overall plat design was revised to reduce impacts to critical areas, provide a more efficient road layout and respond to neighborhood concerns.

### **PUBLIC COMMENT**

The City received public comment letters in response to the Notice of Application that was issued on April 12, 2023. In summary, the public comments received that are specific to the environmental elements of the SEPA checklist include retention of upland forested areas of the site, preservation of large, mature trees, proposed housing forms, wildlife, stormwater runoff, soil contamination, and recreation opportunities.

### **PERMITS/APPROVALS REQUIRED**

The Proposal is required to obtain approval of a preliminary plat, critical areas and Type II applications for future infill housing and multifamily development. Prior to the City hearing examiner's approval of the preliminary plat application for the Proposal, an environmental threshold determination is required by the responsible SEPA Official to ensure that the Proposal will not likely have significant adverse environmental impacts.

Based on staff's analysis of the environmental record herein and public comments received, the Director or designee under the authority of BMC 16.20.190 may condition proposals to mitigate direct impacts to ensure compatibility with goals and policies and to protect neighboring properties and to preserve natural resources or sensitive environments.

The SEPA Official has determined that the environmental impacts for this project, as disclosed in the application materials and this addendum to the SEPA review, does not have a significant adverse impact on the environment.

### **RESPONSIBLE OFFICIAL'S AMENDMENTS TO CHECKLIST**

#### **Environmental Information Considered:**

- SEPA Checklist, prepared by Nick Palewicz, dated March 30, 2022 and revised February 16, 2023
- Critical Areas Report (MES, January 29, 2021)

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- Mitigation Plan (MES, March 28, 2022; revised February 24, 2023)
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- Traffic Impact analysis (GTC, December 2021)
- Bellingham Habitat Restoration Technical Assessment (November 2015)

The Applicant's environmental checklist and environmental information referenced above and incorporated herein by reference have been determined to be adequate for a SEPA review.

In response to the public comment received by the City and as discussed above, the following provides an analysis of the public comment as it relates to each applicable element of the environment defined under SEPA.

Specific sections of the checklist applicable to the Proposal are identified below.

## **B. ENVIRONMENTAL ELEMENTS**

Public concerns were raised that removal of the mature forest will have detrimental impacts on air quality and stormwater runoff.

### **2. Air; a-c**

This section of the checklist is intended to address emissions to air and the potential impacts to air quality associated with such emissions. The applicant adequately addresses this section by specifying that temporary impacts to air quality will occur during construction and that ongoing emissions from activities typically associated with single-family residential development will occur as it does in most other areas of the City.

### **3. Water**

- c. **Water runoff:** Public concerns were raised regarding impacts to the adjacent, downhill properties from the additional stormwater runoff resulting from the Proposal.

The preliminary drainage report and engineered drawings prepared for the Proposal demonstrate that stormwater runoff from the streets will be directed away from the abutting downhill properties to the west via enclosed stormwater mains with direct discharge to a detention facility. Stormwater runoff from lot development is proposed using full dispersion compliant with Washington State Department of Ecology's guidance. Dispersion associated with development south of Montgomery Road will be direct to the adjacent wetland. Dispersion associated with development north of Montgomery Road will provide dispersion with flow direction consistent with the topography.

The Proposal will require the preparation of a final engineered stormwater site plan in compliance with the City's stormwater regulations pursuant to Chapter 15.42 BMC. These code provisions require the engineer to demonstrate the Proposal will not increase post-development runoff to adjacent properties.

### **4. Plants**

The environmental checklist description of plants is adequate to conduct SEPA review.

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In addition to the plants listed in the checklist, public comment indicated the site contains Phantom Orchid.

Public concerns were raised about the amount of clearing and the symbiotic relationship with the loss of forested lands and increased potential loss of habitat for the referenced orchid. Concerns were also raised regarding potential impacts to air quality resulting from the loss of trees. Comments specify that trees remove carbon dioxide from the air and store carbon in their structure as well as the soil, while also releasing oxygen into the atmosphere.

Based on the application materials and the information provided in the SEPA checklist, approximately 24.8 acres or just under 62% of the site are shown as Open Space Reserve Tracts on the preliminary plat map. These Open Space Reserve Tracts are proposed to retain the forested natural state with the exception of the minimal disturbance anticipated to construct the public trail along the western edge of the parcel.

The City owns 50 acres of forested land adjacent to and northwest of the Proposal. The City does not have an approved master plan for the development of these acres but anticipates use primarily for trail purposes with trail-head parking, which should result in minimal impact to its forested condition. Combined, the city-owned parcels and the preserved 24.8 acres of the Proposal creates an area of approximately 75 acres that is proposed to be left mostly in its natural forested condition and/or enhanced through code required mitigation.

The application materials did not include a project-level specific tree retention analysis for the development tracts or single-family lots shown on the preliminary plat. The Tree Risk Assessment by TGI, dated 2/10/2022 includes information on the general composition of retained open space areas. The Assessment also includes specific recommendations for trees where infrastructure is proposed and within proximity to existing residences along the western plat boundary.

The overall plat design partially addresses the performance standards in BMC 23.08.030 through retention of the forested areas within the Open Space Reserve Tracts. Further compliance of these performance standards and those in BMC 16.60.080(B) concerning tree retention, tree replacement species and ratios is more appropriately evaluated at the project-level phase of development and specifically at the time that public infrastructure plans are submitted to the City.

Replacement tree species and ratios will be applied in order to restore and augment forest canopy, habitat structure and diversity. Implementation of these objectives through plat conditioning is anticipated to maintain a certain level of air quality within the project area, while also balancing the intended purpose for development.

A conservation easement granted to the public for the 24.8-acre forested and wetland areas should be recorded to protect these lands in perpetuity and to allow the city to require restoration from potential damages.

## **5. Animals**

The environmental checklist description regarding animals is adequate to conduct SEPA review. Public comment raised concerns over the loss of wildlife habitat resulting from the Proposal. In addition to the animals listed on the checklist, public comments indicate hawks, eagles, owls, bobcats and cougars have been observed in the general vicinity of the Proposal.

Some habitat loss will occur due to site development. However, a wildlife corridor will

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remain. The corridor is comprised of the city-owned forested property to the north and the area of the retained forest on the project site.

The site does not contain any wildlife species on the State's Priority Species and Habitats List, but it does contain habitat that is on the list. Forested areas with snags (dead standing trees) and downed wood are present, and this habitat is known to be used by pileated woodpeckers and the big brown bat. These habitat features will remain within the retained forested area on the site and protected in perpetuity through a conservation easement or deed restrictions.

Tree retention and replacement requirements will provide habitat structure and diversity. Approximately one-acre of wetland will be created and connected to wetland A on the subject site which will provide additional habitat for a variety of aquatic and terrestrial species. Species using the site are likely to continue to be those that tolerate urban development.

No additional mitigation beyond city code requirements is necessary for this Proposal.

## **7. Environmental health**

Public concerns were raised that the subject site was previously used as a fill site that may have contained unwarranted construction debris.

The SEPA checklist identifies that an environmental assessment of the fill piles was performed and found materials containing petroleum contaminants and semi-volatile organic compounds. The process for removing these materials is appropriately identified in the checklist with the Department of Ecology overseeing the removal.

Required mitigation to address this issue has been identified and no further action is necessary to mitigate the issue.

## **8. Land and Shoreline Use**

The maximum allowable density under the zoning's 4,300 square foot density requirement yields a maximum of 405 units through the cluster bonus provisions. The zoning special regulation limits the number of duplex and multifamily units to 25% of the allowable units, which is 102 units.

The Proposal includes utilizing the cluster bonus option requiring at least 50% of the total units be developed under the infill housing provisions.

The final determination of the total number of units and housing types will be determined at the project-level review associated with the proposed development tracts for compliance with the above stated zoning restrictions.

## **12. Recreation**

The Proposal includes formalizing an existing trail consistent with the City's Parks Recreation and Open Space Plan. The trail construction is anticipated to result in minimal removal of vegetation. The trail location is limited in part by the site topography and critical areas, which limits the trail's location to the western portion of the site. Impacts from the trail's location on abutting properties will be evaluated through the land use compliance review of the preliminary plat application.

No additional mitigation beyond city code requirements is necessary for this Proposal.

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## **Bell, Kathy M.**

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**From:** RICHARD CAMPBELL <2camp@comcast.net>  
**Sent:** Tuesday, April 18, 2023 12:53 PM  
**To:** Bell, Kathy M.; RICHARD CAMPBELL  
**Subject:** Queen Mountain Preliminary Plat

Hi Kathy,

My wife and I live at 4309 Blackstone Way, in the King Mountain development. Our kids and grand kids live at 660 Montgomery. The posted announcement of the Queen Mt. preliminary Plat said I could ask you questions, here are a few.

The announcement said that "approximately 60% of the forest cover is proposed to be retained."

1. Does that 60% include or not include the forest on top of Queen Mt. set aside to be parkland?
2. What percentage of forest cover was proposed to be retained in the King Mountain development, aka Ralph Black's development?
3. Given that large portions of the King Mountain Development were clear cut and left undeveloped for five years and counting, probably longer, what force of law does the city have to make sure the Queen Mountain developer doesn't do the same thing?
4. What assurances can the city give to the neighborhood that the 60% retained forest cover will be enforced?

Thanks, Kathy  
Sincerely Rick Campbell



## **Bell, Kathy M.**

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**From:** tletae@aol.com  
**Sent:** Tuesday, April 25, 2023 1:02 PM  
**To:** Bell, Kathy M.  
**Subject:** Queen Mountain developement

Hi Kathy,

I live at 667 Montgomery Rd., Bellingham, WA 98226. I would like to submit and express my concerns regarding the Queen Mountain development property directly adjacent to our property. It is my understanding that the trail will come up against our property line. I would like to request that when doing any forest removal to lay the trail that any old growth trees be preserved. I have lived on this property for 75 plus years and some of these trees have been here before my birth. They not only deserve to remain and live but also would provide beauty to the travelers on the trail. As well, also preserve any old growth trees that are on the development area for the same reasons. They not only provide beauty but history to this area. Also, I would like to request that the only clear cutting be for only the area where the proposed dwellings will be located. Don't clear cut areas that might only be a possibility. People who purchase a home in the Queen Mountain development are choosing to live on a mountain, a mountain already populated by a long living forest that will provide a peaceful beautiful scene.

I appreciate you listening and taking into consideration these requests.

Thank you,

Teresa Eiden 360-734-6545

**Bell, Kathy M.**

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**From:** tara adrian-stavik <tdadrian77@gmail.com>  
**Sent:** Tuesday, April 25, 2023 10:27 AM  
**To:** Bell, Kathy M.  
**Subject:** public comment re: SUB2022-0021/VAR2022-0007/CAP2022-0018/SEP2022-0024

hello,

I am a resident of the King Mountain neighborhood and I write to submit my comments on the permit applications referenced above. I'm specifically commenting on the tree removal that this development will require, and asking that, in the interest of congruence with the myriad of plans, assessments and goals this City has surrounding the urban forests within our boundaries, approval be delayed pending adoption of the Urban Forestry Management Plan that is currently in process. The applicant proposes to maintain 60% of the current forest cover and I shudder to think of where we would be if every new development that takes place on the forested, unbuilt land that is prevalent in this neighborhood were to only maintain approximately 60% of the forest canopy present.

The desire to maintain forest health is mentioned as a goal and objective in countless City plans, assessments, ordinances and technical documents that apply to development within City limits. Most of them state in various places that natural resource preservation, including forests, is a long standing goal and even an expectation of the City's residents. (P. 1 and 2, City of B'ham Comp Plan Environment Chapter, 2016). The 2015 Habitat Restoration Technical Assessment determined this particular block of forest (block no. 134) has the highest levels of habitat functionality and therefore "would be a primary focus for investigating protection actions to maintain function." (figure 4A, P. 16 and 23, Bellingham Habitat Restoration Technical Assessment, 2015).

We ask that staff take into consideration the need to preserve existing healthy forest canopy and require that the applicant increase the percentage of forest maintained on the parcel from 60% to 70% or more, specifically focusing on maintaining all healthy forest canopy in the trail/open space area located on the western side of the parcel.

Thank you for your consideration,

Tara D. Adrian-Stavik

## Bell, Kathy M.

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**From:** Melissa Gille <melissagille@gmail.com>  
**Sent:** Wednesday, April 26, 2023 11:43 AM  
**To:** Bell, Kathy M.  
**Subject:** Comments Regarding development located at 4175 Iron Gate Road (a.k.a. Queen Mountain Subdivision)

Hello Kathy,

As a Queen Mountain neighborhood homeowner (4373 Frances Ave), I am writing to submit my comments regarding the proposed development located at 4175 Iron Gate Road.

The proposal states that 60% of tree cover will be retained; however, much of what will be preserved is the scrappy, younger tree cover down in the wetlands and not the 70+-year-old trees on the ridge and slope.

These mature forests are not only a priceless resource for those living on King and Queen Mountain but also for the greater Bellingham community as they protect nearby water systems, promote the survival of various local plants and wildlife, and break down ambient air pollution--a large concern for the community as we continue to see the rise in air pollution from summer forest fires (see [Unity College's paper on protecting old growth forests](#); NIH's paper on [Old growth forests as critical organisms connecting ecosystems and human health](#); and U.S. Fish and Wildlife Service's paper on [Four Elements of a Healthy Forest](#)).

I am writing to express my support for more tree retention, especially of the oldest trees, which are [vital to the survival and continued health of the forest](#). Also, I'd like to ask that the development be phased and that clearing of trees corresponds to the phasing of tract development. We don't want clear-cutting to occur across the whole parcel and then sit bare for over a decade as has happened elsewhere in Bellingham and Whatcom County. This practice has been shown to [degrade soil, endanger local wildlife, and put communities at risk of landslides and flooding](#). I'd also like to suggest that the approval of future tract development be subject to the soon-to-be-complete Urban Forestry Management Plan.

Thank you for your consideration. Please don't hesitate to reach out if further clarification is needed.

Kind regards,  
Melissa Gille

**Bell, Kathy M.**

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**From:** Starr, Fiona E.  
**Sent:** Thursday, June 22, 2023 10:12 AM  
**To:** clue461@ecy.wa.gov; Printz, Jacalen M CIV USARMY CENWS (USA); Department of Natural Resources (sepacenter@dnr.wa.gov); sepa (sepa@dahp.wa.gov); Hagin, Emily (EmilyE.Hagin@pse.com); Mcconnell, Brian; Dunphy, Gregg; Vincent J. Feliciano Jr.; Lawyer, Curtis; Denton, Julie; Jessica Sankey; Ritchey, Angie; DFW R4Nplanning; Newsroom, BLH  
**Cc:** Bell, Kathy M.  
**Subject:** Notice DNS Queen Mountain Plat  
**Attachments:** Notice-DNS-SEP2022-0024-with-Report.pdf; SEP2022-0024-Env-Checklist.pdf

**Determination of Non-Significance (DNS)  
Use of Phased SEPA Determination (WAC197-11-060(5))  
SUB2022-0021/VAR2022-0007/CAP2022-0018/SEP2022-0024**

**Date of Issuance of Threshold Determination:** 6/20/2023

**Project Name:** Plat of Queen Mountain

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**Lead Agency:** City of Bellingham, Planning and Community Development Department (PCDD)

**Fiona Starr, Office Assistant**

Planning & Community Development, City of Bellingham

210 Lottie Street, Bellingham WA 98225

360-778-8300 (main) 360-778-8357 (direct) 711 (Washington State Relay)

[fstarr@cob.org](mailto:fstarr@cob.org)

My incoming and outgoing e-mail messages are subject to public disclosure Requirements per RCW 42.56

## Bell, Kathy M.

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**From:** Starr, Fiona E.  
**Sent:** Thursday, June 22, 2023 10:30 AM  
**To:** Bell, Kathy M.  
**Subject:** Fw: SEPA record published

### **Fiona Starr, Office Assistant**

Planning & Community Development, City of Bellingham  
210 Lottie Street, Bellingham WA 98225  
360-778-8300 (main) 360-778-8357 (direct) 711 (Washington State Relay)  
[fstarr@cob.org](mailto:fstarr@cob.org)

My incoming and outgoing e-mail messages are subject to public disclosure Requirements per RCW 42.56

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**From:** NoReply@ecy.wa.gov <NoReply@ecy.wa.gov>  
**Sent:** Thursday, June 22, 2023 10:18 AM  
**To:** Starr, Fiona E. <fstarr@cob.org>  
**Subject:** SEPA record published

The SEPA admin reviewed and published [SEPA record number 202303025, "Plat of Queen Mountain"](#).  
Lead Agency File Number: SEP2022-0024.  
It will now be available to the public.

From: Marjorie Jordan-Sabo  
Email: [separegister@ecy.wa.gov](mailto:separegister@ecy.wa.gov)  
Phone number: (564) 669-3418