



May 20, 2024

Ryan Nelson  
City of Bellingham Planning and Development  
210 Lottie Street  
Bellingham, WA 98225

**SUBJECT: OFFSITE CONCEPTUAL MITIGATION FOR 2825 LINDSHIER AVENUE PROPERTY (PARCEL 380316-159249), BELLINGHAM, WASHINGTON**

Mr. Nelson;

The applicant for the project at the 2825 Lindshier Avenue property is proposing to create three additional lots on the property – for a total of four lots. These lots will front Lindshier Avenue along the south side of the property. The creation of the lots will facilitate the eventual construction of access and residences on the proposed lots. This will necessitate limited direct and indirect wetland fill to small low category wetlands on the property. Potential direct and indirect impacts will likely total between 2,000 and 4,500 square feet – depending on site design and layout. The property consists of a level bench along the south portion, with scattered wetlands, and a steep slope across the center and north portions of the property. Given the only potential for development is along the south portion of the property, and the steeply sloped nature of remaining areas of the property, onsite wetland mitigation is not a feasible option. Accordingly, the applicant has located a potential property to complete wetland mitigation to offset the potential impacts. The potential mitigation property is located at 1972 Hemmi Road. The proposed mitigation site is within the Ten Mile Creek subwatershed, a component of the Barret Lake watershed within the lower Nooksack Basin. This watershed is adjacent to the Squalicum watershed, where the project site is located. Both watersheds eventually drain to Bellingham Bay. Site figures of the offsite property are attached.

The offsite mitigation area was visited by Miller Environmental Services on May 3, 2024. The site consists of herbaceous wetland area that is annually hayed/mowed. The mitigation would be adjacent to a large pond that is the headwaters of an unnamed fish stream that drains southward to 10-mile Creek.

The wetlands on the Lindshier Avenue property that would be proposed for fill are Category III and IV wetlands; these wetlands provide low to moderate water quality, hydrologic and habitat functions. The area proposed for mitigation is adjacent to a headwater pond that is within the 10-mile Creek basin. This basin has several sections of Category 5 - 303d waters. Additionally, the basin is within the Nooksack River Watershed Bacteria TMDL. Mitigation within this wetland will greatly increase water quality, hydrologic and habitat function, with the enhancement of a hayfield wetland to a forested wetland adjacent to a headwater pond.

The proposed mitigation on East Hemmi Road, within the 10-mile Creek/Nooksack River Watershed will increase water quality, hydrologic and habitat wetland functions in the upper portion of an impaired basin that drains to Bellingham Bay. This will provide a greater ecological benefit and greatest likelihood of success.

Lindshier Avenue Property Offsite Conceptual Mitigation  
Page 2

Please contact me at (360) 255-5799 or [ed@millerenvironmental.org](mailto:ed@millerenvironmental.org) if you have any questions or need additional information.

Sincerely,

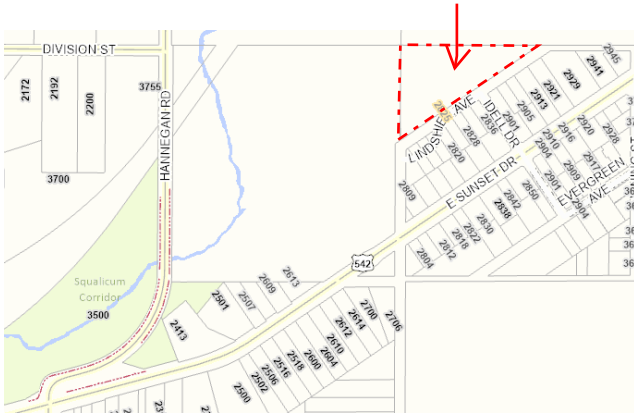
A handwritten signature in blue ink, appearing to read "Ed Miller". The signature is fluid and cursive, with the first name "Ed" and the last name "Miller" clearly distinguishable.

Ed Miller, PWS  
Senior Biologist

Attachments: Offsite Mitigation Location Figure

PREFERRED MITIGATION SITE FOR 2825 LINDSHIER AVE SHORT PLAT (05.15.2024)

2825 Lindshier Ave



1972 E Hemmi Rd

