



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

September 26, 2011

Tyler R. Schroeder, Current Planning Supervisor  
Whatcom County Planning and Development Services  
5280 Northwest Drive  
Bellingham, Washington 98226

Dear Mr. Schroeder:

**RE: Mitigated Determination of Nonsignificance (MDNS) for unpermitted clearing and geotechnical investigation at the Gateway Pacific Terminal site**

Thank you for the opportunity to comment on the MDNS for the above mentioned project. We have reviewed the Environmental Checklist and the Critical Areas Study and Mitigation Plan (Mitigation Plan) for the unpermitted vegetation clearing and geotechnical investigation and have the following comments:

Approximately 2.9 acres of forested and shrub wetlands were cleared of vegetation for access roads to geotechnical boring sites. Another 1.0 acre of forested and shrub wetlands were covered with side-cast soil and woody debris, for a total of 3.9 acres of wetland impacts. Some of the trees cut were large cottonwoods and at least one large cedar, although most of the cleared forested wetlands were comprised of second growth alder trees with a dense shrub understory. The Mitigation Plan specifies that these wetlands will be restored by pulling back side-cast material, scarifying road beds, and replanting with woody vegetation.

The Department of Ecology (Ecology) generally requires additional mitigation for the temporal loss of wetland functions. In this case, it will take decades for the habitat functions of the cleared wetlands to be fully replaced. Ecology will require a minimum of 2.9 acres of additional wetland enhancement to offset the temporal loss of wetland functions.

On September 23, 2011, we sent a letter to the applicant stating the temporal loss mitigation requirement with additional recommendations. This letter is attached.

Ecology would like to have the geotechnical investigations completed as soon as possible so that the site can be restored and full mitigation can be completed within a year. Once again, thank you for giving us the opportunity to comment. If you have any questions, please contact me at 425-649-7168 or [susan.meyer@ecy.wa.gov](mailto:susan.meyer@ecy.wa.gov).

Sincerely,

Susan Meyer, Wetland Specialist  
Shorelands and Environmental Assistance Program

ecc: GPT MAP Team Members  
Katie Skipper, PIO ECY

