

January 9, 2006

Regional Environmental Program Manager  
GSA Public Buildings Service  
Northwest/Arctic Region  
U.S. General Services Administration  
400 15<sup>th</sup> Street, S.W.  
Auburn, WA 98001-6599

**Re: Comments on Draft Environmental Impact Statement (EIS) - Peace Arch Port of Entry**

To Whom It May Concern:

The City of Blaine submits these comments on the Draft EIS for the Redevelopment of the Peace Arch Port of Entry. The concerns expressed herein are consistent with those that were raised during the initial scoping effort and these issues need to be resolved before finishing the design and moving into construction.

**EXIT 276 AND ACCESS TO BLAINE**

Adequate access from Interstate 5 into our Central Business District is critical. Despite the efforts of GSA to keep the facility as far north as possible, our discussions with both the Federal Highway and State Department of Transportation representatives indicate that the current concepts still do not meet standards for both the northbound or southbound ramps at exit 276. Much of this has to do with adequate ramp lengths and weaving. The vitality of Blaine's Central Business District is highly dependent upon the consumers, business people and tourists who enter the community at this location. The City and the Port of Bellingham have made millions of dollars of investments in the redevelopment of the downtown and harbor areas and even more improvements are planned in the near future. Degraded access to Blaine is unacceptable.

The location of egress from the secondary inspection area continues to be an issue in the configuration of the adjacent roadway and appears to still be a problem with each of the concepts presented. It is critical that motorists who are directed into secondary inspection still have opportunity to visit Blaine without putting themselves at risk due to an unsafe merge or inadequate decision times.

Our original concern with northbound traffic related to enhanced outbound inspections appear to no longer be an issue. The remaining northbound ramp issues are more related to adequate merge lengths and standard highway design factors. These elements should be addressed cooperatively with the Federal Highway Administration.

Any changes to the Port of Entry should include provisions for adequate signage to inform southbound motorists of upcoming exits and services that are available. Because the response time following the booths is very limited, this signage should be placed ahead of the southbound

inspection booths so that motorists can make their decisions about exiting prior to going through the booths.

Both northbound and southbound ramps terminate in what are essentially five-legged signalized intersections, which we believe will become increasingly challenged as our community grows. Introducing roundabouts may be one way to help improve this condition.

The timing of this project and potential that the schedule will not accommodate the integration of road improvements on the same timeline as the construction of the facilities is a serious concern to the City of Blaine. We want to avoid a situation where “interim” road improvements, implemented to accommodate the GSA schedule, become permanent once the GSA project is completed.

## **WATER QUALITY – STORMWATER**

The Port of Entry relocation and expansion will increase the impervious area and hence stormwater runoff. The City of Blaine has adopted the Department of Ecology Stormwater Management Manual for Western Washington and the design should comply with that guidance. Adequate treatment of this runoff, much of which comes from surfaces contaminated by motor vehicle byproducts, must be thoroughly addressed in the design of the facility. The adjacent receiving waters of Semiahmoo Bay are a major habitat and feeding area for migrating bird populations and other marine life. Elevated amounts of toxic runoff or related pollutants will adversely affect already stressed marine wildlife.

For this reason we would argue that enhanced treatment is required, contrary to what is proposed on page 3-9 of the DEIS. The high volume of vehicles using the POE, many of which are idling for extended periods of time, present an unusual risk for stormwater pollution that should be addressed with specific stormwater treatment best management practices targeted at removing those pollutants. Considering the nature of the vehicle staging area, not including oil control treatment, seems totally inconsistent with stormwater best management practices. The ability to contain oil spills before they are discharged into Semiahmoo Bay seem to be a critical component of the stormwater system.

GSA should interact closely with the City of Blaine and WSDOT in the design and review of storm water improvements in the area.

## **LOCAL TRAFFIC**

It appears that planned revisions for employee access and parking will increase traffic volumes on local streets, particularly along Second Street. Second Street is part of a five-legged intersection that should be analyzed as part of the design process. Improvements to Second Street, including on-street parking, should be included as mitigation for the impact of the additional trips that will be created by the proposed concepts.

## **PUBLIC ACCESS (BICYCLE AND PEDESTRIAN)**

The proposed project does not appear to do anything to increase public access to the unique shoreline views afforded by this property. The transportation section of the DEIS does not adequately address this topic. While the Port is principally a vehicle-oriented facility, it is also very important that adequate and safe access be provided for pedestrian and non-motorized (e.g. bicycle) traffic to and from the facilities. The Coast Millennium Trail begins just south of the

Port and runs along Marine Drive. There are also city pedestrian and bicycle features that should be linked to the new facility. Provision should be made for people using these paths to continue their travel northward into Canada via the existing trail network that extends into and beyond White Rock. Pedestrian and non-motorized access should be integrated with access to and within Peace Arch State Park. Lacking these linkages, pedestrians and cyclists will still arrive within the area of the Port, but their movements will lack direction or control. Also no mention is made of facilities designed to accommodate transit use in conjunction with the POE.

## **RESIDENTIAL RELOCATION AND LAND SUPPLY**

The approximate 5.3 acres and existing 13 housing units that GSA proposes to acquire for employee parking and access to the new facility are on property currently zoned High Density Residential. This results in a potential reduction in housing stock greater than the immediate loss. At 24 units per acre this area at full build-out would represent over 100 residential units and therefore will reduce the land supply available for residential development in Blaine by that amount.

The information in the Draft EIS regarding housing supply relies on information that should be updated. The housing supply and values have changed significantly since the year 2000.

## **AIR QUALITY**

The negative impacts on air quality associated with exhaust emissions from the large number of idling vehicles waiting to be inspected is another issue that should be considered during the planning and design process. Increased northbound inspection activities would increase emissions adjacent to Blaine residential and commercial properties.

## **NOISE & GLARE**

Consideration should be given to minimizing the glare from facility lighting and noise associated with vehicles waiting in line to be inspected. We are particularly concerned about the impacts on adjacent residential properties. These impacts would be exacerbated with the installation and use of northbound booths. Any negative impacts to adjacent residential neighborhoods should be evaluated and mitigated. This should include exploring the use of lighting and landscaping designs that minimize the impact of glare and noise on the surrounding residential areas. Such plans should be developed in close cooperation with the State Park and the City of Blaine.

## **PARK INTEGRATION, VIEWS, AND APPEARANCE**

It is clear from the EIS that a significant and commendable effort has been made to integrate the new facility into its location abutting the Peace Arch State Park, one of the gems of our community and this region. Blaine is known as the "Peace Arch City". It is critical that GSA not lose this focus on compatible architecture and landscaping which complements both the adjacent Park as well as our community. The Peace Arch is the northwestern gateway to our community, the region and the nation. We are very concerned about the impact of this facility and the reconstructed roadway through it on existing views from adjacent properties. The final design should carefully consider the unique aesthetic issues and pedestrian activities associated with this particular location.

The City is particularly concerned with landscaping plans for the Second Street entrance into Peace Arch Park and stormwater plans for the parking lot area. The development of landscaping and stormwater designs should be developed in close cooperation with the City of Blaine and the State Parks staff. Landscaping in general should be developed in cooperation with the State Park staff.

## **RESTROOMS**

The post-September 11, 2001 closure of public restrooms for motorists passing through the border has resulted in a significant increase in incidents involving passengers relieving themselves on I-5 immediately south of the border crossing or, at various levels of desperation, inquiring about restroom facilities in Blaine. These incidences, cumulatively, contribute to elevated pollutant levels that find their way into the mudflats in Semiahmoo Bay. New plans should address this human condition either with restroom facilities on location or with off-site facilities immediately before or after the crossing.

Sincerely,

Gary R. Tomsic  
City Manager  
for Blaine City Council