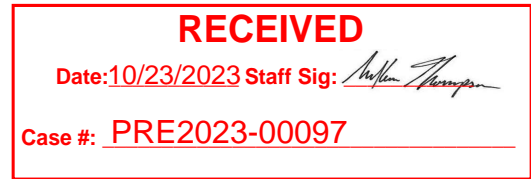




October 23, 2023

Whatcom County Planning and Development Services  
5280 Northwest Drive  
Bellingham, WA 98226  
Phone: 360-778-5900



*Overview*

Thank you for the opportunity to submit a Whatcom County Pre-Application Conference Request Narrative for our project at 741 Marine Drive (TP#: 3802231063740000). This project will construct a metal processing facility. Portions of the project site are currently covered with gravel surfacing and are currently utilized for shipping container storage and staging. Other portions of the project site are currently undeveloped and contain wetlands, vegetation, and trees.

The facility will accept for purchase metal material, subject to an inbound Source Control Program, primarily post-consumer depolluted automobiles and kitchen appliances, with all fluids thereof previously removed, and process the metal material through the proposed metal shredder. Ferrous metal produced from the process would be delivered to the Port of Bellingham by truck or railcar and loaded on to ocean going vessels to its ultimate destination. Non-ferrous metal produced from the process would be delivered to the Port of Seattle by truck and loaded on to ocean going vessels to its ultimate destination. These ferrous and non-ferrous metal products are manufactured for purchase on the secondary metal industries market, which reduces global mining and use of virgin materials. The project includes erection of various pre-manufactured steel buildings. Metal processing equipment of various designs will also be installed onsite, largely located inside buildings. A rail spur will be installed on the south side of the site; in addition, truck scales, concrete and asphalt paved areas for storage and movement of trucks and rolling stock will be installed. Here is a summary of the proposed buildings:



- **BUILDING 1 OFFICE/SHOP**
  - Height: 32'-3-1/4" (1 Story)

- Size: 6,294 SF
- Type of Construction: IIB
- **BUILDING 2 SEPARATION**
  - Height: 37'-4-1/4"
  - Size: 13,058 SF
  - Type of Construction: IIB
- **BUILDING 3 RECLAMATION**
  - Height: 34'-4-1/4"
  - Size: 25,095 SF
  - Type of Construction: IIB
- **BUILDING 5 TWITCH**
  - Height: 32'-3-1/4"
  - Size: 6,294 SF
  - Type of Construction: IIB

Note: There is no Building 4 described in this pre-application request. This is to maintain consistency with internal ABC Recycling naming conventions for the development.

### *Hours of Operation*

The hours of operation will be from 7:00AM to 10:00PM. The metal shredding activity will not occur for this entire timeframe. Other activities on the site instead of the metal shredding could include administrative work, maintenance work, trucking, delivery and other activities.

### *Water Service*

As shown in the attached letter, Water District #2 can provide 20 gallons per minute of domestic flow and fire flow of approximately 500 gallons per minute. A watermain will be installed throughout the site to provide hydrants within 300' of all buildings and parking areas to meet the Whatcom County Fire Code. The connection point will be on Marine Drive to the existing 8" Watermain.

### *Septic Service*

The project will connect to the City of Bellingham Sewer System per the attached late-comers agreement.

### *Stormwater Management*

A complete stormwater management report will be submitted with the Building Permit Application to show compliance with:

- A. *Whatcom County Code (WCC) Title 20.80.630*
- B. *Washington State Department of Ecology 2019 Stormwater Management Manual for Western Washington (WSDOE Manual)*

A stormwater detention pond will be installed to provide flow control for the site. The project will meet the enhanced treatment requirements of the WSDOE 2019 Manual for the industrial use of the site. The project will outfall to the existing Whatcom County stormdrain system in Marine Drive. The discharge rate from the site will be substantially reduced from the current condition to help alleviate downstream conveyance stresses on the existing system.

### *Zoning and Adjacent Land Uses*

The project site is generally bound by Marine Drive to the north, an existing Burlington Northern Santa Fe (BNSF) rail spur line to the south, existing businesses to the east, and a vacant parcel and single-family residences to the west. Adjacent uses to the north, beyond Marine Drive, include commercial uses including a vitamin store, an ice cream shop, a marine supply store, and a car stereo store. Adjacent uses to the east include Marine Drive Auto Service (an automobile repair shop), Life Church (a church), a vacant commercial building located at 749 Marine Drive, and other commercial uses. Adjacent uses to the south, beyond the BNSF rail lines, include the Lehigh Hanson Bellingham Cement Grinding Plant. Beyond the Lehigh Hanson Cement Grinding Plant is the Bellingham Bay. Adjacent uses to the west include an undeveloped, vacant parcel and single-family residences. Nearby and surrounding land uses include single-family residences, industrial uses (lumber yard, a steel company, and storage), commercial uses, and public transportation stops.

The project is located area is zoned for Heavy Impact Industrial. The proposed use of the site is permitted under Whatcom County Code 20.68.054(6):

*Primary metal industries including blast furnaces and steel works; mills for primary smelting, secondary smelting, refining, reducing, finishing, rolling, drawing, extruding, and casting of ferrous and nonferrous metals; and the manufacture of miscellaneous metal products.*

The project equipment is proposed to manufacture separated ferrous and non-ferrous metal products. The metal products produced at the site will ultimately be purchased in the market for use in secondary metal industries, which reduces global mining and use of virgin materials.

### *Building Setbacks*

The lot abuts the border of the HII zone on three sides: north, west, and east. Thus, per WCC 20.68.550 [.551-554], a 100-foot setback is required from the district boundary as long as a 50-foot buffer planting screen is established in accordance with 20.80.345. The proposed site plan includes such a 50-foot buffer. This buffer extends from the north, west and east of the existing property. The setback to the rear yard is 30 feet per WCC 20.80.210(5)(b).

### *Parking*

The project will require 1 stall per employee per shift. The project will require 15 employees per shift and 15 stalls. 18 stalls are including a handicap stall.

*List of additional responsible parties or representatives, including agent, contractor, engineer, design professional, etc.*

- **Noise Study:**

*SSA Acoustics*  
Alan Burt, P.E.  
Managing Partner  
SSA Acoustics, LLP  
Office: 206.839.0819  
Mobile: 206.683.6870  
www.ssaacoustics.com

- **Critical Areas and Wetlands:**

*Anchor QEA*  
Christine Simmons, MS  
Managing Scientist  
ANCHOR QEA, LLC  
csimmons@anchorqea.com  
20 Bellwether Way, Ste 101  
Bellingham, WA 98225  
D 360.715.2737  
M 630.234.8282

- **Air and Environmental Remediation:**

*GeoEngineers, Inc.*  
Rob Ralstin  
Senior Compliance Specialist  
Telephone: 425.861.6006  
Mobile: 503.347.4425  
Fax: 425.861.6050

Email: rralstin@geoengineers.com

17425 NE Union Hill Road Ste 250  
Redmond, WA 98052  
www.geoengineers.com

- **Environmental Remediation:**

*GeoEngineers, Inc.*  
Mark Havighorst, P.E.  
Associate Environmental Engineer  
Telephone: 503.460.7146  
Email: mhavighorst@geoengineers.com

5820 S Kelly Ave Suite B  
Portland, OR 97239

- **Traffic:**

*Transpo Group*  
Linda Cuadra  
Senior Project Manager  
Office: 206-502-4055  
Cell: 360-731-6661  
linda.cuadra@transpogroup.com

- **Architectural:**

Robert Matichuk A.I.A.  
TRC Architecture  
360-371-2802  
360-201-0408 cell

- **Civil Engineer:**

Scott Goodall, MS, PE  
Principal  
Impact Design, LLC  
5426 Barrett Road, Suite A103  
Ferndale, WA 98248  
(360) 389-8138

- **Structural Engineer:**

Brandon Hausmann, PE  
Principal  
Direct: (360) 474-7541

Office: (360) 200-8703  
203 W. Chestnut St.

- **Stormwater Water Quality Consultant**

*Water Tectonics*  
TJ Mothersbaugh  
6300 Merrill Creek Parkway  
Suite C-100, Everett, WA 98203  
Mobile: (206) 947-5950

*Vesting and Permit Submittal Plan*

Through submittal of this request for preapplication conference, Applicant intends to vest under WCC 22.05.060(3), which provides:

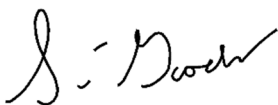
"Notwithstanding the provisions of subsections (1) and (2) of this section, for a project permit application that is (a) subject to a preapplication conference per WCC 22.05.020 and 22.05.040, (b) submitted no more than 28 calendar days from the date the department issued its notice of site-specific submittal requirements, and (c) determined complete by the department, the application shall be considered under the zoning or other land use control ordinances in effect on the date the preapplication conference request was submitted to the department."

The applicant intends to comply with the requirements of (b) and (c) to vest as of the date of the submission of this preapplication conference request.

Pursuant to WCC 22.05.020, a preapplication conference is required as the proposal will at minimum require a Commercial Building Permit Application. Additional permits may also be required, and a dialogue with Whatcom County Planning and Development Services is necessary to clarify which applications will be required here. A pre-application conference will provide a welcome opportunity to discuss. Additional reports and studies will accompany these applications as required

Thank you for your time.

Respectfully,



Scott Goodall, PE, MS  
Principal  
Impact Design, LLC