



WHATCOM COUNTY PLANNING AND DEVELOPMENT SERVICES

PRE-APPLICATION MEETING FINDINGS

Meeting Date: November 16, 2023

Issue Date: November 30, 2023*

*Reissued for corrected date

Pre-Application Meetings

Purpose

The purpose of this pre-application meeting is to assist applicants in preparing their development applications for submittal to the County. Pre-application meetings include all County departments responsible for development review. County representatives will describe the type of application(s) necessary, the review process, and applicable development regulations. The pre-application meeting may also identify issues and concerns wherever noted.

A pre-application is not meant to be a detailed review of proposed plans or ideas. Furthermore, staff's site-specific pre-application comments are not an order, final permit decision, or final administrative determination subject to appeal, pursuant to WCC 22.05.160. Final determinations are only made through the review of a project permit application or code interpretation as provided for in WCC 22.20.

Fees collected for pre-application meetings are non-refundable; however, the fee paid shall apply to the application fee at the time of formal application, if made within one calendar year of your pre-application meeting.

Please be aware that any communication or checklists provided does not imply approval or conditional approval of the pending application. Future review of your formal application may require changes, alterations, or additional information to clarify the details of your proposal and design. Applications for permits may be subject to the review and discretion of other County bodies such as the Technical Review Committee, Hearing Examiner or County Council. Please note that substantial changes to the project may require an additional pre-application meeting. **Pre-application review does not constitute acceptance of an application by Whatcom County nor does it vest an application.**

Web Links:

- [Whatcom County Planning and Development Services](#)
- [Whatcom County Code \(WCC\)](#)
- [Whatcom County Applications](#)
- [Whatcom County Qualified Natural Resource Consultant List](#)

Applicable Permits, Codes, and Review Procedures

The following permits/approvals may be applicable to your project. However, please review the attached memorandums for potential county code issues/conflicts with this proposal. All applicable application submittal forms can be found on the County’s web page.

Applicable Permits

Based upon the submitted application materials and information presented, the following permits:

[Major Project Permit](#)

Land Fill and Grade and/or
Building Permits and

Required Submittal Items

Items below must be submitted with your application in order for a determination of completeness (WCC 22.05.050(1)). Items required for the Commercial Building Permit applications are marked as an ‘X’ in the “COM” column. Items required for a Major Project Permit are marked as an ‘X’ in the ‘MPP’ column. Some items are necessary for both permit applications.

COM	MPP	Items below must be also be submitted with the appropriate permit application in order for your application to be determined complete:
X	X	Detailed Project Narrative (including the following) <ul style="list-style-type: none"> - Number of Employees - Compliance with Performance Standards (WCC 20.68.700) - Consistency with permitted use (WCC 20.68.054) - Hours of Operation - Discussion regarding quantity and disposal of non-metal by-product - Explanation on “inbound source control program” - Minimum and maximum floor area ratios - Address public access to the site - Proposed use of the building and property
X	X	Preliminary Traffic Form
	X	Preliminary Traffic Memo/Narrative
X	X	Preliminary Stormwater Form
X	X	Stormwater Site Plan
X	X	Site Plan <ul style="list-style-type: none"> - Parking, showing ADA & Electric vehicle charging stalls - Bicycle Parking

COM	MPP	Items below must be also be submitted with the appropriate permit application in order for your application to be determined complete:
		<ul style="list-style-type: none"> - Proposed OSS primary and reserve drainfield location - Critical areas and associated buffers - Location of existing and proposed fire hydrants - Access roads (see Fire Marshal’s Memo) - Footprint of building located on lot and to other structures on the lot (fully dimensioned) - Topography lines - Access roads or Driveway (length and width dimensioned) from the County Road - Firetruck/Emergency vehicle turnarounds and turnouts. - Where required; Fire Flow systems (Fire Water tanks, hydrants, Fire pumps, Fire Department Connections (FDC)) - Existing and proposed landscaping and trees/plants.
X	X	SEPA Checklist
X	X	Landscape Plan (consistent with WCC 20.80.650)
	X	Noise Study
X	X	Critical Areas Assessment (including recognized author)
	X	Critical Areas Mitigation Plan (including recognized author)
	X	Evidence of service availability – water, sewer (onsite septic), power, cable, natural gas, telephone
	X	Title Report
	X	Written narrative for compliance with Major Project Permit criteria (WCC 20.88.130)
	X	Conceptual Site Development Plan (Administrative Manual, 2018) <ul style="list-style-type: none"> - Proposed buildings and other structures - Existing mature trees and landscaping - Pedestrian and vehicle circulation system - Parking areas - Open space and critical areas - Parking areas - All existing improvements that will remain onsite - All improvements associated with the proposed use - Conceptual plans for possible future uses - General location of usable open space, or land dedicated for open space, pedestrian and transit connection, internal circulation, location of proposed gates and fencing
	X	Phasing plan (Administrative Manual, 2018) <ul style="list-style-type: none"> - Proposed development phases - Sequence of proposed developments - Estimated dates - Interim uses of the property awaiting development - Proposed temporary uses during construction

COM	MPP	Items below must be also be submitted with the appropriate permit application in order for your application to be determined complete:
	X	Circulation, transportation and parking (Administrative Manual, 2018) <ul style="list-style-type: none"> - Projections by phase of traffic impacts - Probably safety concerns - Internal circulation layout - Ingress/egress locations - Proposed road standards - Expected number of peak daily trips - Analysis of the impact on the adjacent street system - Proposed mitigation - Projected peak parking demand - Analysis of the demand compared to proposed on-site and off-site supply - Potential impacts to the on-street parking system and adjacent land uses - Mitigation measures
	X	Utilities (Administrative Manual, 2018) Must include evidence of service availability from primary service providers: <ul style="list-style-type: none"> - Water - Sewer (OSS) - Power - Cable - Natural Gas - telephone
	X	The master plan must identify critical areas as defined in Chapter 16.16 WCC and areas of special concern as defined by WCC 24.05.230. Mitigating measures for all environmental impacts identified by the applicant through a SEPA checklist, or EIS process and/or identified by agency staff, including but not limited to special development standards, modification of site layout, dedicated open space and mitigation replacement areas must be identified. Identification of any hazardous wastes anticipated, special handling techniques and/or site designs required for containment must also be addressed. If an EIS is required, the EIS and master plan may, upon approval by the director, be combined into a joint document (Administrative Manual, 2018).
X		Structural plans (height, elevations, floor plans and equipment foundations)
X		Structural engineering
X		Water Availability form
X		Energy, Mechanical, Plumbing and Lighting
X	X	Availability Notification for Public Fire Water
X	X	Provide site map showing labeled storage areas, waste material storage areas, and dumpster locations that meet the International Fire Code.

COM	MPP	Items below must be also be submitted with the appropriate permit application in order for your application to be determined complete:
X		WCHCS approved on-site sewage (OSS) design
	X	A narrative from a licensed on-site sewage system (OSS) designer specifying the location, size and type of OSS
	X	Completion of questions within the Whatcom County Health and Community Services Memo (attached)
X	X	Detailed Code Summary (see Plans Examiner Memo)
X	X	Elevation Plans - all sides showing existing and finished grade - dimensioned to show overall height and floor to ceiling height
X		Architectural Plans (see Plans Examiner Memo)
X		Engineering Plans (see Plans Examiner Memo)
X		Washington State Energy Code (see Plans Examiner Memo)
X		Mechanical Plan/Plumbing Plans (see Plans Examiner Memo)
X		Solar Readiness Plans (see Plans Examiner Memo)
X		Electric Vehicle (EV) Readiness Plan (see Plans Examiner Memo)

Applicable Whatcom County Codes (WCC):

- WCC Title 12 – Roads and Bridges
- WCC Title 15 – Buildings and Construction (Fire)
- WCC Title 16 – Environment (Critical Areas) and SEPA
- WCC Title 20 – Zoning
- WCC Title 21 – Land Division Regulations
- WCC Title 22 – Land Use and Development Procedures
- WCC Title 23 – Shoreline Management Program
- WCC Title 24 – Health Code
- Whatcom County Comprehensive Plan

Project Information:

Case Number
PRE2023-00097

Meeting Date and Time
November 16, 2023 at 10AM

Project Name
ABC Recycling

Proposal
The applicant, is proposing a metal processing facility located at 741 Marine Drive, Bellingham, Washington. As stated by the applicant, the project description is as follows:

The facility will accept for purchase metal material, subject to an inbound Source Control Program, primarily postconsumer 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. Nonferrous 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.

Summary of the proposed buildings:

BUILDING 1 OFFICE/SHOP

o Height: 32'-3-1/4" (1 Story)

o Type of Construction: IIB

BUILDING 2 SEPARATION

o Height: 37'-4-1/4"

o Size: 13,058 SF

o Type of Construction: IIB

BUILDING 3 RECLAMATION

o Height: 34'-4-1/4"

o Size: 25,095 SF

o Type of Construction: IIB

BUILDING 5 TWITCH

o Height: 32'-3-1/4"

o Size: 6,294 SF

o 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.

Applicant/Property Owner(s)

Andy Anthony

ABC Recycling Realty Corp.

2219 Rimland Drive Suite 301

Bellingham, WA 98226

Agent

Scott Goodall, PE

Impact Design

5426 Barrett Road, Suite A103
Bellingham, WA 98248

Property Information

Site Location(s)

741 Marine Drive, Bellingham, WA

Assessor's Parcel Number(s) (APNs)

380223106374

Acreage

16.69 acres

Zoning

Heavy Impact Industrial

Comprehensive Plan Designation

Bellingham Urban Growth Area

Fire Protection

Whatcom County Fire District #8

Zoning Comments

The list below is intended to provide an overview of those Current Planning requirements having the most impact to your site design do not represent an exhaustive list of all regulations that will apply to the proposed development. Please refer to the Whatcom County Code for the County's development regulations.

Heavy Impact Industrial District – Purpose (WCC 20.68.010)

The purpose of the Heavy Impact Industrial District is to implement the Heavy Impact Industrial land use designation of the Comprehensive Plan by supplying a reasonable amount of land, commensurate with demand, for the location and grouping of heavy impact industrial uses. Heavy industrial uses are primarily related to producing, distributing and changing the form of raw materials; whereby, product demand and industrial employment are predominately basic, that is, serving nonlocal markets. In addition, the purpose of this district is to encourage the siting of industrial uses which will optimize the limited resource of land available for heavy impact industry. A further purpose of this district is to minimize the scope of impacts generated within the HII District and to provide protection for nonindustrial districts situated outside thereof; as enabled through the district's performance and development standards, and the buffer and setback requirements. (Ord. 98-083 Exh. A § 66, 1998).

Permitted Uses (WCC 20.68.050),

Unless otherwise provided herein, permitted and accessory uses shall be administered pursuant to the applicable provisions of Chapters 16.08 WCC (SEPA), 20.80 WCC (Supplementary Requirements) and 22.05 WCC (Project Permit Procedures), and WCC Titles 21 (Land Division Regulations) and 23 (Shoreline Management Program). The purpose of the SIC

numbers listed within this chapter is to adopt by reference other activities similar in nature to the use identified herein. (Policies of the subarea Comprehensive Plan may preclude certain permitted uses to occur in particular subareas. Please refer to the policies of the applicable subarea plan to determine the appropriateness of a land use activity listed below.)

WCC 20.68.054 The following are permitted uses except as otherwise prohibited:

(1) The manufacture and process of paper including pulp, paper and paperboard mills; and building paper and board mill products.

(2) The manufacture and processing of chemicals and allied products including industrial inorganic and organic chemicals; synthetic resins, rubber, fibers and plastic materials; soap, detergents and cleaning preparations; paint, linseed oil, shellac, lacquer and allied products; chemicals from gum and wood; and agricultural chemicals.

(3) The manufacture and processing of rubber and plastic products.

(4) Leather tanning and finishing.

(5) The manufacture and processing of cement and glass; and concrete, gypsum, plaster, abrasive, asbestos and nonmetallic mineral products.

(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. [emphasis added]

(7) Storage of asphalt in the Heavy Impact Industrial Zone.

Comment: Please demonstrate in your project narrative that the existing and proposed uses on site meets the permitted use section of WCC 20.68.054. Include specific details on the manufacturing of miscellaneous metal products as well as potential non-metal by-products gathered through the process. Within the narrative, please explain how the proposal is not a solid-waste handling facility.

Note: A Type III Solid Waste Handling Facility may be prohibited (WCC 20.68.187(2)(d)).

Prohibited Uses (WCC 20.68.200)

All uses not listed as permitted, accessory, administrative approval, or conditional uses are prohibited, including but not limited to the following, which are listed here for purposes of clarity:

WCC 20.68.203 In the Bellingham Urban Growth Area the following uses are prohibited: petroleum refinery and the primary manufacturing of products thereof, primary manufacturing and processing of rubber, plastics, chemicals, paper, asbestos and products derived thereof; and primary metal industries.

Comment: Please demonstrate in your project narrative that the existing and proposed uses do not meet any of the prohibited uses in WCC 20.68.203.

Development Standards (WCC 20.68.250 - .709)

Building Setbacks – (WCC 20.68.350)

Building setbacks shall be administered pursuant to WCC 20.80.200, 20.80.254 and 20.68.550.

Zoning District	Setback (in feet) from:						
	Right-of-Way Classification					Other	
	I-5, State Highways, Urban Principal, and Urban Minor Arterials	Urban Collector Arterials and Rural Major Collectors	Minor Collectors	Local Access Streets	Minor Access Streets	Side Yard	Rear Yard
Industrial Setbacks							
Heavy Impact Industrial (HII)	100	100	100	100	30	30	30
Note: Depending on circumstances, some HII setbacks may differ pursuant to WCC 20.68.552 and 20.80.254 (3).							

Comment: A 100-foot side yard setback is required off of the property line abutting the north, east and western property lines for purposes of building setbacks. Please also refer to the buffer requirements below as more stringent setbacks may be required along certain property lines as well as WCC 20.80.254.

Height Limitations – (WCC 20.68.400)

No maximum height is established; however, when a building exceeds 50 feet, the setback requirements of WCC 20.80.200 shall be increased by one foot for each foot of building height in excess of 50 feet, as applicable to all setbacks.

Comment: Identify height of building and any proposed outdoor storage of materials.

Lot Coverage – (WCC 20.68.450)

The maximum building or structural coverage shall not exceed 60 percent of the lot size.

Buffer Area – (WCC 20.68.550 - .552)

.551 The industrial user shall establish a buffer for building sites adjoining the boundary of the Heavy Impact Industrial District (HII), which shall be located adjacent to the district boundary. The purpose of the buffer is to optimize the visual appearance of the site by obscuring industrial activity from view by passing motorists, to contribute to on-site and off-site impact

abatement, and to move towards attaining compatibility with surrounding nonindustrial land uses and character.

.552 To implement the buffer requirements of this district, minimum setbacks for heavy industrial buildings and accessory structures shall be established consistent with the following options:

(1) If a planting screen is not provided by the industrial user and no natural vegetative screening exists, the minimum setback(s) shall be 660 feet, as measured from the edge of the district boundary. The setback area may be used for security roads, parking, or open space.

(2) If natural sight-obscuring and dense vegetation exists, the minimum setback(s) shall be 250 feet, as measured from the district boundary; provided, that a minimum width of 50 feet of natural vegetation is retained. The remainder of the setback(s) may be used for security roads, parking, or open space.

(3) If a 50-foot buffer planting screen is established, pursuant to WCC 20.80.345, the minimum setback(s) shall conform to the setback requirements of WCC 20.80.200, as measured from the district boundary. In addition, security roads may be situated within the minimum buffer setback; provided, that the 50-foot-wide buffer planting is established. [emphasis added]

(4) When a parcel situated within this district is located within the Bellingham Urban Growth Area and adjoins an Urban Residential District or residential district within the city limits, setbacks for heavy industrial buildings and/or uses shall be increased to 100 feet and landscaped in accordance with the requirements of WCC 20.80.345. [emphasis added]

(5) In no case shall the setback from the northern and western boundaries of the Cherry Point Heavy Industrial Area not contiguous to another industrial zone be less than 660 feet, nor the natural vegetation removed except for parking and security or protective uses.

Comment: A landscape buffer is required for this proposed development and it appears that WCC 20.68.552(4) would apply. The property is adjacent to the Neighborhood Commercial and the Light Impact Industrial zones and near the Urban Residential (UR6) zone. A 100-foot setback is required along those property lines as well as a landscape buffer per the requirements of WCC 20.80.345 (north, west and east borders).

Sign Regulations – (WCC 20.68.600)

Sign regulations shall be administered pursuant to WCC 20.80.400.

Landscaping Regulations – (WCC 20.68.651)

Refer to WCC 20.80.300 for landscaping requirements.

Comment: A landscape and buffer plan appears to be required for this proposal. The plan must meet the following standards in WCC 20.80.300 -385:

WCC 20.80.320 Plan.

The landscaping plan shall be to scale (preferred 1" = 20') and include:

- A legend;
- Number and location of all existing plants and trees on site;
- Names (species) of all plants and trees to be planted;
- The sizes of plants and trees at the time of planting;
- An indication of what existing trees will be removed;
- A root detail;
- Proposed watering/irrigation method and;
- Location of all proposed exterior lighting.

WCC 20.80.325 Location and spacing of vegetation.

- All open space must be landscaped and may consist of a combination of trees, lawn, ground cover, shrubs and up to 20% of a non-vegetative decorative pervious material. The plan must show the total open space calculation.
- One tree is required for every 2,000 square feet of open space including walkways or plantings along property lines. Natural habitat may be appropriate.
- Deciduous trees shall be proposed parallel to all rights-of-way.
 - Small flowering trees spaced at 25 feet on center.
 - Medium flowering trees spaced at 35 feet on center.
 - Large canopy trees spaced at 45 feet on center.
 - Alternatively, Informal clumpings of coniferous or broad leaved evergreen and/or deciduous trees may be utilized in an amount equivalent to a row of trees spaced 25' on center.

WCC 20.80.330 Plant sizes at the time of planting.

The plan shall specifically state the planting sizes of all vegetation at the time of planting.

1. Evergreen trees shall be a minimum height of five feet with an average height of six feet above the finished planting bed.
2. Deciduous trees shall be at least one and one-half inches in caliper measured four feet above ground level.
3. Shrubs shall be at least 21 inches in height above finished grade.
4. Ground cover shall provide an immediate coverage of at least 50 percent, and result in total coverage of the required landscape areas within three years as follows:
 - (a) Four-inch pots at 18 inches on average; or
 - (b) One-gallon or greater sized containers at 24 inches on average.

WCC 20.80.335 Plant choices.

New landscaping materials shall include species native to the coastal region of the Pacific Northwest or noninvasive non-native species that have adapted to the climatic and soil conditions of the coastal region of the Pacific Northwest. Trees with weeping or contorted branching structures may be used as accent planting but should generally not be included as part of a screen planting or in plantings parallel to property lines.

WCC 20.80.340 Existing Vegetation.

Applicants are encouraged to retain existing vegetation as appropriate and existing vegetation may be used to meet all or part of the landscaping requirements of this chapter.

WCC 20.80.345 Buffering Plantings.

Buffers are required when the proposed use is in a commercial or industrial zone and is directly adjacent to and shares a common boundary with property in a rural or residential zone. Buffering plantings are intended to provide an all-season visual screen between commercial or industrial uses on one side, and rural or residential uses on the other side. Buffers shall, at a minimum, consist of two offset rows of predominantly coniferous trees at an average spacing of 15 feet triangulated on center or an equivalent effect. Some deciduous trees shall be included and shrubs may be interspersed to provide interlocking root structures to reduce windthrow. Buffers are normally 25 feet wide unless otherwise approved by the administrator upon receipt of a detailed planting plan prepared by a landscape architect.

WCC 20.80.350 Landscaping around parking areas.

- A minimum five-foot wide landscape strip shall be provided around the perimeter of all parking areas. Natural or planted buffers may be considered to meet this requirement.
- Whenever a nonresidential parking lot containing more than 10 parking spaces is located in or adjacent to a residential zone, it shall also be screened on any side facing residential uses or zones where there is no intervening street.
- The visual impact of parking areas shall also be minimized by separating the area into modules that contain no more than 12 vehicles in a row. Each module shall be separated from other areas by a five-foot wide planting strip containing trees, shrubbery, or other ground cover in such substantial density as to break up long sight lines and overviews of parked cars.

WCC 20.80.355 Trash/storage areas.

All trash and/or garbage collection and storage areas must be screened from view from adjacent streets and properties using a solid fence or wall a minimum of six feet high.

WCC 20.80.360 Special landscape requirements for individual zone districts.

Heavy Impact Industrial (HII): For heavy industrial uses refer to the buffering requirements in WCC 20.68.550. For all other uses the front yard landscaping shall be 15 feet, similar to the requirement for the Light Impact Industrial Zone.

Modifications WCC 20.80.370.

The zoning administrator may approve a modifications to the plan if the landscaping plan is prepared by a state of Washington licensed landscape architect.

WCC 20.80.375 Bonding requirement.

All landscaping and required irrigation shall be installed prior to occupancy. The county may accept for one year a performance bond of 125% of labor and materials cost to install the landscaping. A landscaping maintenance bond or other approved monetary security for 10% of the labor and materials cost to install the approved landscaping shall be submitted prior

to occupancy or release of any landscaping performance security held by the county. The bond will be released two years after completion of the landscaping, if the landscaping has been maintained in a healthy manner.

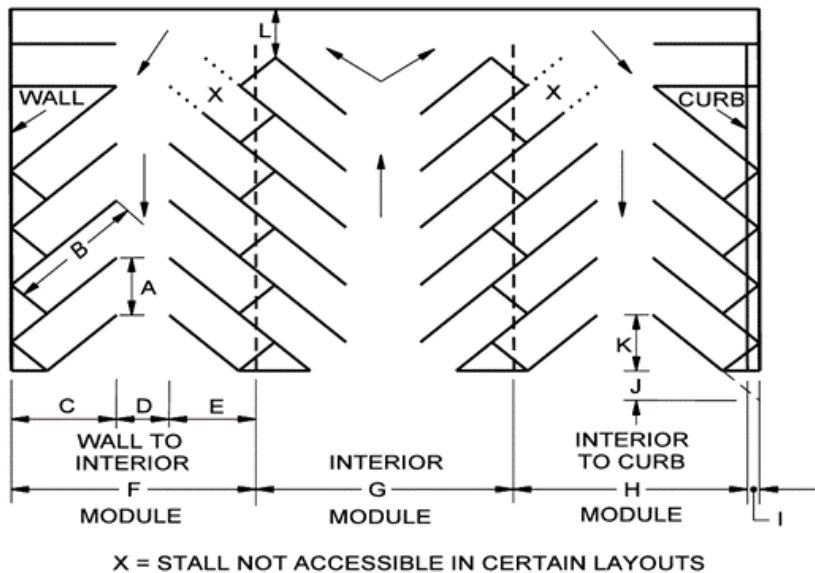
Off-street parking and loading regulations (WCC 20.68.652)

Off-street parking and loading provisions shall be administered pursuant to WCC 20.80.500. In addition, loading areas must be located in such a manner that no loading, unloading and/or maneuvering of trucks associated therewith takes place on public rights-of-way.

Comment: Please provide a parking plan which meets the following standards in WCC 20.80.500-.580:

Parking space dimensions (WCC 20.80.510).

1. A parking space shall have minimum rectangular dimensions of not less than nine feet in width and 18 feet in length; provided, however, that for any parking area of 12 or more spaces, 35 percent of all spaces may have minimum rectangular dimensions of not less than eight feet in width and 15 feet in length; provided, that these spaces are marked for use by compact automobiles. All dimensions shall be exclusive of driveways, aisles, and other circulation areas. The number of required off-street parking spaces is established in WCC [20.80.580](#).
2. The following off-street parking diagram indicates the dimensions necessary to achieve the dimensions of subsection (1) of this section at various angles. Note that:
 - a. If a parking lot section is designated for compact vehicles the stall may be eight feet by 15 feet for a 90-degree parking angle.
 - b. Stalls should be larger for commercial vehicle parking.
 - c. Applicant may provide larger spaces to accommodate their customers/tenants that have larger personal vehicles.
 - d. Bumper overhang should be considered in placing lighting, railings, etc. These appurtenances should be placed beyond dimension "I" in the diagram.
 - e. Only two-way traffic should be used with 90-degree parking angles.



Dimension	Diagram Location	Parking Angle			
		45°	60°	75°	90°
Stall width, parallel to aisle	A	12.5	10.5	9.2	9.0
Stall length of line	B	27.6	23.6	21.0	18.0
Stall depth to wall	C	19.4	20.3	20.0	18.0
Aisle width between stall lines	D	12.1	12.8	23.0	20.0
Stall depth, interior	E	16.4	18.0	19.0	18.0
Module, wall to interior	F	47.9	55.1	62.0	63.0
Module, interior	G	44.9	53.1	61.0	63.0
Module, interior to curb face	H	45.9	52.5	59.4	60.0
Module, interior to curb face	I	2.0	2.3	2.5	2.5
Offset	J	6.6	2.5	0.7	0
Setback	K	13.1	9.2	4.9	0
Cross aisle, one-way	L	14.1	14.1	14.1	14.1
Cross aisle, two-way	---	20.0	20.0	20.0	22.0

Bicycle parking facilities (WCC 20.80.527).

1. Bicycle parking facilities shall be provided in all developments within an urban growth area (UGA) or limited area of more intensive rural development (LAMIRD) requiring 10 or more parking stalls pursuant to and as identified in WCC 20.80.505 (General requirements), except for single-family and two-family residential dwellings and agricultural uses or where these requirements are waived per subsection (5) of this section.
2. Each such development shall provide a number of bicycle parking spaces in accordance with the following:
 - a. Short-Term Bicycle Parking. If a land use or development project is anticipated to generate visitor traffic, the project must provide permanently anchored bicycle racks within 100 feet of the visitor's entrance. To enhance security and visibility, the bicycle racks shall be readily visible to passersby. The bicycle capacity of the racks must equal an amount equivalent to five percent of all required off-street vehicle parking, as identified in WCC 20.80.580 (Parking space requirements) and WCC 20.80.590 (General interpretations). There shall be a minimum of one rack with capacity for two bicycles.
 - b. Long-Term Bicycle Parking. Such developments shall provide secure bicycle parking for five percent of all required off-street vehicle parking spaces, as identified in WCC

- 20.80.580 (Parking space requirements) and WCC 20.80.590 (General interpretations). There shall be a minimum of one long-term bicycle parking space. Acceptable parking facilities shall be convenient from the street and include one or a combination of the following:
- i. Covered, lockable enclosures with permanently anchored racks for bicycles.
 - ii. Lockable bicycle rooms with permanently anchored racks.
 - iii. Lockable, permanently anchored bicycle lockers.
 - iv. In the case of multifamily residential development, a standard garage is sufficient, if available.
 - v. Reduction of Vehicular Parking Spaces. The number of vehicular parking spaces required by WCC 20.80.580 may be reduced by the number of bicycle parking spaces required by subsections (2)(a) and/or (b) of this section, though may not be reduced by more than that required even if the applicant provides additional bicycle parking spaces.
3. Bicycle Racks. Required bicycle parking may be provided in floor, wall, or ceiling racks. Where required bicycle parking is provided with racks, the racks must meet the following requirements:
- a. The bicycle frame and one wheel can be locked to the rack with a high-security U-shaped shackle lock if both wheels are left on the bicycle.
 - b. A bicycle of six feet in length can be securely held with its frame supported so that the bicycle cannot be pushed or fall in a manner that will damage the wheels or components.
4. Parking and Maneuvering Areas.
- a. Bicycle parking facilities shall be installed in such a way as to not impede pedestrian or vehicular movement.
 - b. Each required bicycle parking space must be accessible without moving another bicycle. There must be an aisle at least five feet wide adjacent to all required bicycle parking to allow room for bicycle maneuvering. Where the bicycle parking is adjacent to a sidewalk, the maneuvering area may extend into the right-of-way. The area devoted to bicycle parking must be hard surfaced.
 - c. If required bicycle parking is not visible from the street or main building entrance, a durable sign must be posted at the main building entrance indicating the location of the bicycle parking.
5. The director may waive the requirements of this section for individual applications if it can be shown that the use would not attract nor serve cyclists, whether customers or employees.
6. Developments not required to provide bicycle parking per subsection (2) of this section, but voluntarily choose to do so, may avail themselves of the reduced vehicular parking standards allowed by subsection (3) of this section so long as they meet all the requirements of this section. However, in no instance shall vehicular parking be reduced by more than 25 percent.

Wheel blocks (WCC 20.80.555)

Whenever a parking lot extends to a property line, wheel blocks or other suitable devices shall be installed to prevent any part of a parked vehicle from extending beyond the property line.

Striping (WCC 20.80.575)

All hard-surfaced parking areas with a capacity over 12 vehicles should be stripe between stalls to facilitate vehicular movement.

Lighting (WCC 20.80.523)

Any parking area which is intended to be used primarily used during nondaylight hours shall be properly illuminated. Any lights used shall be arranged as to direct the light away from adjoining properties

Access (WCC 20.80.565)

Any parking area shall be designed in such a manner that any vehicle leaving or entering the parking area from or into a public or private street shall be traveling in a forward motion. Access of driveways for parking areas or loading spaces shall be located in such a way that any vehicle entering or leaving such lot shall be clearly visible for a reasonable distance to any pedestrian or motorist approaching the access or driveway from a public or private street. This requirement shall apply to parking areas of two or less required spaces only when exits are on state highways and major county arterials and collectors. Clear vision areas shall be maintained at exits to the same specifications as alley-street intersections in WCC 20.80.210(3). No building permit shall be issued until an access plan is approved by the county engineer.

Parking Space Requirements (WCC 20.80.580)

(33) Manufacturing uses: 1 for every employee (on the largest shift for which the building is designed and 1 for each motor vehicle maintained on premises.

Noise (WCC 20.80.620)

No development shall exceed the maximum environmental noise level established by Chapter 173-60 WAC. More rigorous standards may be specified in regulations of specific zoning districts. The use of exhaust brakes in residential areas may be restricted as authorized under the provisions of RCW 36.75.270 and 46.44.080.

Comment: A noise study must be prepared and submitted with a permit application. The noise study must include information detailing the expected noise levels of the proposed machinery at adjoining property lines (see [WAC 173-60](#)) for noise created internal and external to the proposed buildings. The study must also include proposed abatement measures and associated structural documents if expected noise levels exceed applicable WAC 173-60 standards.

Performance Standards – (WCC 20.80.700)

Pollution control and nuisance abatement (WCC 20.68.701)

Each industry is required to continuously employ the best pollution control and nuisance abatement technology when reasonably and practicably available for each particular industry; provided, that where federal, state, or regional laws or regulations provide for the level of technology to be employed, the appropriate standards shall apply.

Heat, light and glare: (WCC 20.68.702)

All operations and facilities producing heat, light or glare, including exterior lights, shall be so constructed, screened or used as to not unreasonably infringe upon the use and enjoyment of property beyond the boundaries of the district.

Ground vibration (WCC 20.68.703)

No ground vibration other than that caused by highway vehicles, trains or construction activity shall be permitted, which is discernible without instruments, at or beyond the property line for the use concerned.

Odors (WCC 20.68.704)

No odors, dust, dirt, or smoke shall be emitted that are detectable, at or beyond the property line for the use concerned, in such a concentration or of such duration as to cause a public nuisance, or threaten health or safety, or to unreasonably infringe upon the use and enjoyment of property beyond the boundaries of the district.

Noise (WCC 20.68.705)

No use in this district shall exceed the maximum environmental noise level established by Chapter 173-60 WAC.

Toxic gases and fumes (WCC 20.68.706)

Any release of toxic gases or fumes must be in compliance with Washington State and Northwest Air Pollution Control Authority standards.

Liquid pollutants (WCC 20.68.707)

There shall be no off-site release to soil or surface drainage ways of water borne or liquid pollutants.

Appearance (WCC 20.68.708)

New facilities developed in the Bellingham Urban Growth Area shall be designed, constructed, operated, and maintained so as to be harmonious and appropriate in appearance with the existing or intended character of the general vicinity, and such uses shall not change the essential character of the same area.

Comment: In the project narrative please describe how the proposed development will comply with all of the performance standards of the HII zone district.

Concurrency (WCC 20.80.212)

No subdivision, commercial development or conditional uses shall be approved without a written finding that:

- (1) All providers of water, sewage disposal, schools, and fire protection serving the development have issued a letter that adequate capacity exists or arrangements have been made to provide adequate services for the development.
- (2) No county facilities will be reduced below applicable levels of service as a result of the development. (Ord. 98-083 Exh. A § 58, 1998).

Comment: The applicant shall submit letters of concurrency for water, sewage disposal and fire protection. No letter is necessary for schools.

Major Project Permit (WCC 20.88)

To establish standards and procedures that will provide for special review of those projects or developments that because of their magnitude and impact will tend to affect the public at large.

Major project permits (WCC 20.88.100)

.110 All major developments shall, prior to any construction, obtain a major project permit.

.120 A major project permit will be required for mitigation banks proposed in accordance with the provisions of Chapter 16.16 WCC and for any proposed development that meets any two of the following conditions:

Development cost	Estimated cost \$5,000,000 exclusive of land value
Retail	75,000 square feet
Office/Industrial (gross leasable floor space)	200,000 square feet
Residential	300 dwelling units
Motel/hotel	200 units
Number of employees	250
SEPA Review	An EIS is required

In addition the zoning administrator may make an administrative determination after receiving a recommendation from the technical review committee that any project be considered a major development, if in the opinion of the administration it is of a nature that council review would be appropriate.

.205 If a major project permit is determined to be required, an application shall be completed and filed along with the appropriate fees and the application shall be processed in accordance with Chapter 22.05 WCC. A master plan is required as part of the application for a major project permit. The master plan document shall include all elements required per the department's administrative manual.

Comment: It appears as the size and scale of the proposal will require a major project permit and an EIS will be likely to adequately identify appropriate mitigation. See the required submittal items table for master plan document (major project permit) requirements.

A major project permit is considered a Type IV permit (WCC 22.05.020(1)). A Type IV permit requires the following:

- *Preapplication meeting*
- *Determination of Completeness*
- *Notice of Application*

- *Site Posting*
- *Notice of Open Record Hearing*
- *Open Record Hearing held by the Whatcom County Hearing Examiner*
- *Final decision by the Whatcom County Council (closed record)*

A major project permit is valid for two years after approval with the possibility of a one-year extension (WCC 22.05.140(1)).

Building permits that are required to complete a valid project permit (the major project permit) shall vest to the zoning and land use control ordinances in effect at the time the project permit application (WCC 22.05.060(4)).

A major project permit also allows for approval of alternative mitigation plans consistent with WCC 16.16.260(E) which may be used to provide relief from the specific standards and requirements in the Whatcom County Critical Areas Ordinance (WCC 16.16).

SEPA

A completed environmental checklist shall be filed at the same time as an application for a permit, license, certificate, or other approval not specifically exempted in this chapter; except, a checklist is not needed if the county and applicant agree an EIS is required, SEPA compliance has been completed, or SEPA compliance has been initiated by another agency.

The checklist shall be on a form provided by the county, which is in the form of WAC 197-11-960 with additions required by the responsible official in accordance with WAC 197-11-906(4). The county shall use the environmental checklist to determine the lead agency and, if the county is the lead agency, for determining the responsible official and for making the threshold determination. A checklist submittal shall include any checklist review fee specified in the county's uniform fee schedule.

Comment: A completed SEPA checklist shall be submitted with the permit application. Please provide detailed information about the proposed project in the checklist. It appears as there will be likely significant adverse environmental impacts and Whatcom County is likely to issue a Determination of Significance. At a minimum the following will be reviewed:

- *Traffic (including the amount of vehicular traffic that will be generated with material brought in and/or leaving the site)*
- *Rail Traffic*
- *Air Emissions*
- *Noise*
- *Environmental Health – hazardous materials and chemicals*
- *Odor*
- *Appearance*
- *Ground Vibrations*

Filing Procedures

Applications are only accepted digitally via email by sending all application materials to epermits@co.whatcom.wa.us in separate .pdf documents. Once the application has been received a planner will be assigned and you will be contacted with the project number and applicable fees.

You can pay for your permit by the following options:

Credit or Debit Card. Call 360-778-5900 to arrange payment. (there is a 2.35% transaction fee on credit cards, \$1.00 for debit cards.) Please have your permit number ready for the cashier.

Mail a check payable to Whatcom County Planning to 5280 Northwest Drive, Bellingham WA 98226. (please include your permit number on the check)

If you are unable to submit digitally, please call (360) 778-5900 in order to arrange another submittal option. The application will be considered vested upon receipt of the applicable fees and Determination of Completeness. All submittal requirements must be provided to deem your application complete.

Amy Keenan
Senior Planner

Enclosures:

Staff Memos

- Fire Marshal's Office Memo
- Habitat Conservation Areas/Wetlands Memo
- Geohazards Memo
- Plans Examiner Memo
- Health and Community Services Memo
- Shorelines Memo
- Public Works – Engineering Services

WHATCOM COUNTY
Planning & Development Services
Fire Marshal's Office
5280 Northwest Drive
Bellingham, WA 98226-9097
360-778-5900, TTY 800-833-6384
360-778-5901 Fax



Mark Personius, AICP
Director

MEMORANDUM

TO: Amy Keenan
Planning & Development Services

FROM: Will Anderson
Fire Marshal's Office

DATE: November 21, 2023

RE: PRE2023-00097
ABC Recycling
APN: 380223106374

Whatcom County Fire Marshal's Office has reviewed the proposed project referenced above in accordance with WCC 15.04.010 Adoption of referenced codes and WCC 15.04.040 Amendments to the International Fire Code.

Fire Flow

For buildings equipped with an automatic sprinkler system, the water supply shall be capable of providing the greater of:

The automatic sprinkler system demand, including hose allowance.

The required fire-flow.

Fire hydrants shall be located at the entrance at Marine Drive and then spaced every 300 feet per City of Bellingham Fire Code 17.20.30 Section 507.5.1.4.

Underground fire lines are required to be 4 feet minimum depth to the top of the pipe per NFPA 24.

Fire hydrants and Fire department connections shall be a minimum of 40 feet from the buildings they protect.

Fill out and submit the Availability Notification for Public Fire Water Form below.

<https://www.whatcomcounty.us/DocumentCenter/View/8068/Availability-Notification-for-Public-Fire-Water>

Access Roads

Access roads shall be a minimum of 20 feet wide except where hydrants are located. Area in front of a hydrant shall be 26 feet wide for 40 in length centered on the hydrant.

Sprinkler system

NFPA 13 sprinkler system is required to be installed in all buildings at or above 12,000 square feet based on F-1 classification.

Fire Alarm

NFPA 72 Fire alarm systems are required in all buildings that have a sprinkler system installed.

Hazardous Materials Storage

Hazardous Materials Management Plan and Hazardous Materials Inventory Statement are required per the International Fire Code Chapter 5001.5.1 and 5001.5.2

Provide site map showing labeled storage areas, waste material storage areas, and dumpster locations that meet the International Fire Code.

Fire Extinguishers

Fire extinguishers shall be sized and located per IFC Chapter 9 Section 906

Separate Permits Required

Separate Fire Marshal Permits are required for each of the following items: Sprinklers, Fire Alarms, Fire Hydrant/Underground Fire lines.

Thank you,

William Anderson
Fire Inspector
Whatcom County Fire Marshal's Office

WHATCOM COUNTY

Planning & Development Services
5280 Northwest Drive
Bellingham, WA 98226-9097
360-778-5900, TTY 800-833-6384
360-778-5901 Fax



Mark Personius, AICP
Director

Memorandum

TO: Amy Keenan, Current Planning

FROM: Matt Mahaffie, Wetlands and Habitat Conservation Areas

DATE: November 16, 2023

SUBJECT: PRE2023-00097
ABC Recycling
741 Marine Drive, Bellingham, WA
APN# 380223106374

The above pre-application has been routed for review for conformance with the Critical Areas Ordinance (ORD2019-013), specifically Articles 1 - Purpose and Intent, 2 - Administrative Provisions, 6- Wetlands and 7 - Habitat Conservation Areas. According to submitted materials, the applicant is proposing to construct a metal shredder facility on an industrially zoned property.

Wetlands are known to be present on the property, documented in *Wetland Delineation and Critical Areas Report* prepared by Anchor QEA (October 2023). Additionally, Anchor QEA prepared a *Mitigation Plan* (October 2023). These two reports were not reviewed for accuracy as part of the pre-application process, but will constitute the needed documents for a complete application to begin review critical areas (wetlands & HCA's), pursuant to below requirements.

- Wetland delineations are field verified by Whatcom County PDS staff or representative. It was noted in supplied documentation that field work was conducted by Anchor QEA staff in October of 2020. It is deemed unlikely that wetland demarcation is still fully readily apparent onsite, nor was a demarcation schema provided in the supplied report. Prior to site review, applicant shall verify that all site wetland flagging is still present and provide a delineation flagging schema.
- Supplied reports were noted to not have a recognized author. All such documents supplied to Whatcom County must be prepared by a qualified professional pursuant to Whatcom County Code. Additionally, a qualified professional for wetlands must be on the list for same as put forth by Whatcom County. Anchor QEA, nor any staff member of the company is on the qualified professional list for Whatcom County. Prior to review of documents, Anchor QEA and any contributing authors for assessments shall provide the necessary documentation to PDS to be approved and included in the published list of qualified professionals.

This memo does not serve as a final determination of project impacts, or as a determination of project approval. Whatcom County reserves the right to request more information after review of application submittal pursuant to WCC 16.16.250.

WHATCOM COUNTY

Planning & Development Services
5280 Northwest Drive
Bellingham, WA 98226-9097
360-778-5900, TTY 800-833-6384
360-778-5901 Fax



Mark Personius, AICP
Director

Memorandum – Geologic Hazards Review

TO: Ms. Amy Keenan
FROM: Mr. Andy Wiser, L.E.G.
DATE: November 29, 2023
SUBJECT: PRE2023-00097 – ABC Recycling

The proposed development activity is located in a Critical Aquifer Recharge Area (CARA) of Moderate Susceptibility. CARA's are regulated pursuant to Article 5 of the Whatcom County Critical Areas Ordinance, and while the proposed development is not specifically listed as a regulated activity in WCC 16.16.525, waste by-products generated by metal-shredding are interpreted to pose a potential impact to groundwater resources if not appropriately addressed. Furthermore, existing soil contamination at the subject parcel, identified during a Phase 2 Environmental Site Assessment conducted by Anchor QEA, presents another source of potential groundwater contamination that will need to be addressed as part of site planning and development. For the reasons stated above the development proposal is considered a regulated activity in a CARA pursuant to WCC 16.16.525(E), and a complete use permit submittal shall include a hydrogeologic assessment. The assessment shall be performed to the standards outlined by WCC 16.16.535, and shall include recommendations for civil and stormwater improvements appropriate to prevent detrimental impacts to groundwater resources. All recommendations for site development and facility operation presented in the hydrogeologic assessment shall be adopted by the project plans and specifications, and, as appropriate, shall become conditions of approval for any future use permits at the subject parcel.



PRE-APPLICATION MEETING NOTES

FROM: Ron Booth, Plans Examiner II – Building Services
DATE: November 30, 2023
SUBJECT: **PRE2023-00097**– ABC Recycling

Project Review Discussion

The current proposal is for a multiple building metal recycling facility. It appears the proposed buildings are to be of Type 2 construction and have the proposed occupancy classifications:

- Building #1 OFFICE /SHOP - 6294sf: B/S1
- Building #2 Separation - 13058sf: F-1
- Building #3 Reclamation - 25095sf: F-1
- Building # 5 Twitch - 6249sf: F-1
- Stormwater Equipment and associated structure Occupancy unknown at present - to be determined by Architect.
- Scale shack and associated structures occupancy are unknown at present – to be determined by Architect.

Building Code Items Required for Review

The project appears to require a Major Project Permit as well as Commercial Building Permits. Below are Building Code items needed for both application types:

Major Project Permit Application:

Site Plan; Showing the full lot and property lines

- Footprint of the building located on lot and to other structures on the lot (fully dimensioned)
- Topography lines (sloped lots)
- Access roads or Driveway (length and width dimensioned) from the County Road. Firetruck/Emergency vehicle turnarounds and turnouts.
- Where required; Fire Flow systems (Fire Water tanks, hydrants, Fire pumps, Fire Department Connections (FDC))
- Parking, showing ADA & Electric vehicle charging stalls
- Existing and proposed landscaping and trees/plants.

Narrative of the proposed use of the building and property

- Including use of areas that are not contained within a structure (parking, outside storage, outside equipment, etc.)
- Use of all areas within the structures and the lot.

Detailed Code Summary

- Calculated building area, including all levels and all areas. Area calculation shall include porches, decks and covered decks.
- Code year under which the analysis was completed. Applicable code sections for special construction identification or special use)
- Use and occupancy classification. Including mixed use buildings

- Allowable area calculations, allowable height, number of stories, allowable area per story
- Construction type.
- Calculated occupant load, Plumbing fixture calculations and counts.
- Where required;
 - Fire resistive construction
 - Fire protection systems (fire sprinklers, alarms, and smoke control)
 - Occupancy separation walls
- Means of egress analysis. (separate floor plan may be required to illustrate compliance)
 - Including ADA Accessible route

Elevation Plans

- All side showing exiting and finished grade.
- Dimensioned to show overall height and floor to ceiling height.

Commercial Permit Applications:

The proposed development will require commercial building permits. The following items are required for building permits:

Site Plan; Showing the full lot and property lines

- Footprint of the building located on lot and to other structures on the lot (fully dimensioned)
- Topography lines (sloped lots)
- Access roads or Driveway (length and width dimensioned) from the County Road. Firetruck/Emergency vehicle turnarounds and turnouts.
- Where required; Fire Flow systems (Fire Water tanks, hydrants, Fire pumps, Fire Department Connections (FDC))
- Parking, showing ADA & Electric vehicle charging stalls
- Existing and proposed landscaping and trees/plants.

Narrative of the proposed use of the building and property

- Including use of areas that are not contained within a structure (parking, outside storage, outside equipment, etc.)
- Use of all areas within the structures and the lot.

Detailed Code Summary

- Calculated building area, including all levels and all areas. Area calculation shall include porches, decks and covered decks.
- Code year under which the analysis was completed. Applicable code sections for special construction identification or special use)
- Use and occupancy classification. Including mixed use buildings
- Allowable area calculations, allowable height, number of stories, allowable area per story
- Construction type.
- Calculated occupant load, Plumbing fixture calculations and counts.
- Where required;
 - Fire resistive construction
 - Fire protection systems (fire sprinklers, alarms, and smoke control)
 - Occupancy separation walls
- Means of egress analysis. (separate floor plan may be required to illustrate compliance)

- Including ADA Accessible route

Elevation Plans

- All side showing existing and finished grade.
- Dimensioned to show overall height and floor to ceiling height.

Architectural Plans

- Floor plans
 - All spaces labeled by use (Office, storage, manufacturing, retail, Bathrooms, etc.).
 - Unheated and/or unfinished spaces clearly identified.
 - Label all door and window sizes. Include door swing; opening types for windows; note location of emergency escape/rescue openings and/or safety glazing
 - Stair detail showing rise & run, number of treads & risers and location of Handrails & guardrails.
 - ADA features and required elements
 - Location and fuel source for appliances & mechanical equipment.
 - Smoke detectors, carbon monoxide detectors, exhaust fan locations.
 - Show locations of cross section views
- Foundation plans
 - All pads and continuous foundation shall be dimensioned, perimeter and interior.
 - Girders, posts, strip footings or slab.
 - Ventilation and access. Vent calculations on plans.
 - Slab insulation location and type.
 - Retaining walls – location, type and height. (engineering for retaining walls)
 - Foundations for equipment (within or outside of any structure)
- Floor Framing
 - Show & label members (joists, beams, etc.) Specify size, grade, species, type (GLB, TJI etc.)
 - Include framing for decks, covered porches, porches, trellis's and stairs.
- Roof Framing
 - Show & label members (rafter, ridge, etc.) Specify size, grade, species, type (GLB, TJI etc.).
 - Show and label all supporting members (beams, columns, headers etc.)
 - Provide section view of roof system to show collar ties, ceiling joists, etc.
 - Attic spaces – ventilation and access (IRC Section R806 & R807).
 - Engineered Trusses – provide truss lay-out with reactions and bracing details from truss manufacturer.
 - Trusses or roof systems shall be designed to handle all live and dead loading including any mechanical equipment, sprinkler systems, sound panels, lighting or other additional loading that will be supported from the roof system
- Cross sections
 - Typical room configuration (flat or sloping ceiling).
 - General foundation, floor, & roof framing.
 - Room spaces labeled by use
- Wall Sections
 - Foundation, floor, wall and roof construction.
 - Frost depth (minimum 18").
 - Insulation – walls, floors, ceiling, & slab (WSEC).

- Typical construction details.
- Floor, roof, and ledger connections, as applicable.

Engineering Plans (lateral and vertical calculation for all structures, foundations or appurtenances)

- All plans and calculations from the Engineer shall be stamped and signed by the engineer.
- Engineer's structural "S" pages (if not incorporated into the Architectural plans)
- Plans shall be sufficiently dimensioned and detailed
- If required, the same will be required from the Geotechnical Engineer or any other required portions of the plans that require an engineer's review or design.

Washington State Energy Code (all summaries and worksheets)

- All forms shall be completed by a Mechanical Engineer or a design profession competent in the Washington State Energy Code requirements.
- All Items shall be represented on the Architectural Plans or on a separate Mechanical plan set.

Mechanical Plan/Plumbing Plans

- Mechanical and Plumbing plans may be required as separate plans sets depending on the complexity of the project

Solar Readiness Plans

- Roof plan showing solar readiness plan (planned location)
- Roof design must include calculation for additional load of solar panels.
- Provide location of possible future equipment for solar panel equipment on floor plan

Electric Vehicle (EV) Readiness plan

- Provide proposed parking plan that shows required EV spaces and future spaces
- Provide location of possible future EV power supply locations.

Refer to the attached *General Requirements for Commercial Buildings* for additional building permit requirements.

If there are any questions or comments regarding this memorandum, please do not hesitate to contact me at 778-5924 or by email rbooth@whatcomcounty.us

WHATCOM COUNTY

Planning & Development Services
5280 Northwest Drive
Bellingham, WA 98226-9097
360-778-5900, TTY 800-833-6384
360-738-2525 Fax



Mark Personius, AICP
Director

General Requirements for Commercial Buildings

1. This project is subject to compliance with the following codes as adopted by Whatcom County:
 - Chapter 19.27 RCW State Building Code Act;
 - 2018 International Building Code (IBC);
 - 2009 ICC/ANSI A117.1 - Accessible and Usable Buildings and Facilities;
 - 2018 International Mechanical Code (IMC) including WAC 51-52 ventilation reqmts.;
 - 2018 International Fire code (IFC);
 - 2018 Uniform Plumbing Code (UPC);
 - 2018 International Fuel Gas Code (IFGC);
 - 1997 Uniform Abatement for Dangerous Buildings;
 - 2018 Washington State Energy Code (WSEC), WAC 51-11;
 - All applicable Washington State Amendments to the above referenced codes;
 - All applicable code referenced manuals and standards.
 - Whatcom County ordinance adopting and amending the current State Building Code and Chapter 15.04 of the Whatcom County Code.
2. A Washington State licensed architect or professional engineer (PE) will be required by the Building Official to prepare construction documents and act as the registered design professional in responsible charge (IBC Sections 107.1 and 107.3.4, RCW 18.08.410). All construction documents prepared by the architect or PE must be stamped and signed (RCW 18.08.410[9]).
3. The WA State registered design professional shall be designated on the building permit application and submittal documents. The registered design professional shall be responsible for reviewing and coordinating all submittal documents prepared by others, including deferred submittal items, for compatibility with the design of the building. Refer to IBC Section 107.3.4 for additional information.
4. A *Code Summary* is required for all projects and should be located on the cover sheet. The following specific building code design criteria should be included as applicable:
 1. Use and Occupancy Classification Chapter 3; (*single or mixed occupancy, incidental use and accessory use areas; occupancy group*)
 2. Occupancy separations or non-separated use Chapter 4
 3. Special use and occupancy requirements (*i.e. assisted living*)
 4. General building heights and areas, (*that meet allowable limits*)
 5. Height and area modifications (*increases for frontage and/or fire sprinklers*)
 6. Construction type (*II-B*)
 7. Fire-resistance construction (*requirements for walls, penetrations, opening protective*)
 8. Fire protection systems (*fire sprinklers and alarms, smoke control*)
 9. Means of egress analysis including occupant load calculation and exit system requirements Chapter 10; (*a separate Floor Plan may be required to illustrate compliance*)(*egress path, travel distance, requires exits and widths*)
 10. Plumbing fixture calculations and counts
5. When applicable, the registered design professional shall provide a detailed, complete fire-stop plan for review and approval, which is specific to the proposed project. All installed fire-stopping systems shall be inspected by an approved, certified fire-

stopping inspector or inspection agency. All systems shall remain accessible until approved for cover.

6. Listed/tested assembly numbers, specifications and details shall be submitted for all required and/or proposed fire-resistant construction and systems (walls, floor-ceilings, roof-ceilings, penetrations, openings, etc.), no exceptions. Fire-resistance information and data will not be accepted as a deferred submittal.
7. Where firewalls are required, the architect/designer of record shall provide a detailed, complete fire-stop plan for review and approval, which is specific to the proposed project. All installed fire-stopping systems shall be inspected by an approved, certified fire-stopping inspector or inspection agency. All systems shall remain accessible until approved for cover. (Includes incidental use areas i.e. boiler rooms, refrigerant machinery rooms etc. see table 508.2)
8. All occupancies shall comply with IBC Chapter 8 - Interior Finishes including Table 803.9 – Interior Wall and Ceiling Finish Requirements by Occupancy. Documentation verifying classification (flame spread and smoke-developed indexes) of interior finish materials may be required, at the Public Service Inspector's discretion, prior to final inspection.
9. Fully heated, semi-heated and/or cooled buildings or portions of buildings shall comply with the 2018 WA State Energy Code (WSEC) for the building heated envelope, lighting and mechanical systems. Submittals for all projects are to include the following WSEC compliance forms: Envelope (Zone 1), Mechanical and Lighting. (forms can be found at www.neec.net)
10. All occupancies shall comply with IBC Chapter 12 - Interior Environment and IMC Chapter 4 - Ventilation including the WAC 51-52 amendments. Provide complete information indicating how ventilation requirements will be met, including ventilation system plan drawings, system sizing calculations, etc. All mechanical ventilation equipment shall be listed on the WSEC summary forms and plans and shall be part of the required WSEC submittals.
11. Storage of flammable or combustible materials and/or high-pile storage items shall be in accordance with the International Fire Code (IFC). Where conflicts exist between different applicable codes, such as the IBC and IFC, the most restrictive shall govern.
12. Minimum plumbing fixtures shall be provided in accordance with IBC Chapter 29 - Table 2902.1 and applicable WA State Amendments. The registered design professional shall provide calculations verifying compliance with the required minimum number of plumbing fixtures and plumbing schematic drawings, which include fixture calculations, water distribution and waste discharge system sizing calculations.
13. The proposed project is required to meet handicap accessibility requirements per all applicable sections of IBC Chapter 10 & 11, Appendix Chapter E, Sections E101 thru E107, ICC/ANSI A117.1-2009 Accessible and Usable Buildings and Facilities and applicable WA State Amendments. An *Accessibility Analysis* should be provided addressing the following elements: exterior and interior routes of travel, parking, entrances/exits, restrooms, furnishings and equipment.
14. When special inspections are required by an architect/designer/engineer or by IBC Section 1704, the architect/designer/engineer of record shall prepare an inspection program, which shall be submitted to the Building Official for approval prior to permit issuance. The special inspection program shall designate the portions of work requiring special inspections, the name of the individual or firm performing the inspections and the duties of the special inspectors. (IBC Section 1704)

15. All centralized, HVAC systems shall be designed by a licensed mechanical engineer. The required engineer system design and plan drawings shall include listed/tested assembly numbers, specifications, details and locations for all required fire dampers. See IBC Section 716. All submittals shall be stamped and signed by the mechanical engineer.
16. All buildings shall comply with residential and or nonresidential portions of the 2018 WA State Energy Code (WSEC) as applicable. Fully heated, semi-heated and/or cooled buildings or portions of buildings shall comply with the 2015 WA State Energy Code (WSEC) for the building heated envelope and HVAC systems. All buildings must comply with WSEC lighting requirements. Submittals for all projects are to include the following WSEC Compliance Forms: Mechanical Compliance Form, Envelope Zone 1 Compliance Form and Lighting Compliance Form.
17. Washington State Amendments to the International Building Code, WAC Section 51-50-009, requires that space be provided for the storage of recycled materials and solid waste for all new buildings (except Group R-3 and Group U occupancies). The storage area shall be designed to meet the needs of the occupancy, efficiency of pickup, and shall be available to the occupants and haulers (service providers). Refer to the Whatcom County *Recommended Solid Waste & Recycling Enclosure Guidelines* for additional information.
18. Demolition permit is required for the removal of all existing structures. Approval by the Northwest Clean Air Agency (NWCAA) is required prior to issuance of the permit by Whatcom County. NWCAA can be contacted at 800.622.4627 - ext. 212 or by email at info@nwcleanair.org. Building inspection is required after the demolition has occurred.



MEMORANDUM

TO: Amy Keenan
Planning & Development Services

FROM: Sarah Cierebiej
Bill Angel
Environmental Health

DATE: November 28, 2023

RE: PRE2023-00097
ABC Recycling Metal Shredding
741 Marine Drive
APN: 380223106374

Whatcom County Health and Community Services (WCHCS) has reviewed the proposed project referenced above in accordance with WCC 24.05 On-Site Sewage Regulations and WCC 24.11 Drinking Water, WCC 20.88 Major Project Permits and WCC 20.68 Heavy Impact Industrial (HII) District. The applicant is proposing multiple commercial buildings for a metal shredding operation on 19.96 acres in the HII zone.

Sewage Disposal

The applicant must demonstrate adequate sewage disposal capacity for the proposed project. The City of Bellingham has stated they will not provide sewer service to the property at this time.

The applicant will be required to provide a narrative from a licensed on-site sewage system (OSS) designer specifying the location, size and type of OSS that will be required for the proposed project at the time of Major Project Permit application. OSS designs for commercial projects must be located outside of critical areas and their associated buffers unless otherwise approved by Whatcom County Planning and Development Services Natural Resource Staff.

The applicant will be required to provide a WCHCS approved OSS design at the time of building permit application.

Water Supply

The property is in the service area of the Whatcom County Water District #2. The applicant has provided verification that the District can serve the project.

The applicant will be required to provide a WCHCS approved [Water Availability Form](#) (WAF) from the Whatcom County Water District #2 for each building that has potable plumbing at the time of building permit application.

Solid Waste Disposal

WCHCS has the following comments and questions regarding the operation:

1. The applicant will need to provide more information about the Inbound Source Control Program.
 - Is this an industry recognized program, or is it developed by the operator?
 - What pollution prevention best management practices are included in the program?
 - What corrective actions are included in the program to respond to an incident or an event that is counter to normal operating procedures?
 - Is there an Inbound Source Control document for the proposed operation the applicant can provide?
 - What potential pollutants are required to have been removed from the various types of materials received for shredding at the facility?
 - Where are the vehicles and appliances depolluted?
 - How will the applicant verify that materials received at the Marine Drive site have been appropriately depolluted?
 - What is the quality control practice the applicant will perform to verify that materials received at the Marine Drive site have been appropriately depolluted?
 - What is/are the process(es) the applicant will employ to reject materials that have not been appropriately depolluted?
 - How will the applicant provide assurance to the community that materials received at the Marine Drive site have been appropriately depolluted prior to arrival at the site?
 - Will the facility receive materials at the Marine Drive site that will require depollution activities?
 - Will the shredding facility have the ability to perform depollution activities at the Marine Drive site?
 - Will the applicant perform depollution activities at the Marine Drive site if received materials are not appropriately depolluted?
 - What potential pollutants, wastes and contaminants from material depollution activities does the applicant expect to remove from materials at the Marine Drive site? If so, where will depollution activities be performed at the Marine Drive site?
 - Where and how will contaminants from on-site depollution activities be stored at the Marine Drive site?
2. How will the applicant control any litter or metal shredder solid wastes generated by the operation?

3. How will the applicant handle and control shredder residue?
4. How much shredder residue does the applicant estimate will be created? How is it stored and disposed?
5. How will the applicant detect, control and handle any hazardous waste found in the feedstock?
6. At full production, before shredding, where will piles of metal be stored on site?
 - What is the anticipated number and size of pre-shredded piles of metal?
 - Will the piles be stored on the ground or in containers?
 - Will the piles be covered?
 - How long will the piles stay on site before shredding?
7. All full production, after shredding, where will the piles of metal be stored?
 - What is the anticipated number and size of post-shredded piles of metal?
 - Will the piles be stored on the ground or in containers?
 - Will the piles be covered?
 - How often will the piles be removed?
8. How will any runoff be handled from pre-shredding and post-shredding piles?
9. The applicant will need to provide a narrative about the non-potable water used as a coolant and to reduce dust during operation.
10. Does this operation produce any process wastewater? If so, how is it disposed?
11. Will the fire foam stored on site contain PFAS?

WHATCOM COUNTY

Planning & Development Services
5280 Northwest Drive
Bellingham, WA 98226-9097
360-778-5900, TTY 800-833-6384
360-778-5901 Fax



Mark Personius, AICP
Director

Memorandum – Geologic Hazards Review

TO: Ms. Amy Keenan
FROM: Mr. Andrew Hicks, Shoreline Administrator
DATE: November 29, 2023
SUBJECT: PRE2023-00097 – ABC Recycling

As provided in the pre-application materials, no elements of the proposal extend within shoreline jurisdiction. Should the proposal be revised to include elements within 200 feet of the Ordinary High Water Mark (OHWM) associated with Bellingham Bay, the project would be subject to all applicable regulations of the Shoreline Management Program (SMP – Title 23 WCC).



MEMORANDUM

TO: Nick Smith, Planning and Development Services (PDS)
FROM: Maxwell McGee, Public Works Engineering Services (PWES)
DATE: November 27th, 2023
SUBJECT: PRE2023-00097, ABC Recycling Metal Processing Facility, 741 Marine Drive

Engineering Services staff has reviewed a pre-application submittal for the construction of a new metal processing facility consisting of four buildings as well as associated parking and utility improvements. The following comments are based on documents that have been submitted for review. Any changes to the proposed project may modify these findings.

General

1. All development shall comply with the **Whatcom County Development Standards (WCDS)**. (www.whatcomcounty.us/498/Development-Standards).
2. All easements, any physical appurtenances such as fences or structures which may indicate encroachment, lines of possession, or conflict of title, must be shown on the site plan.
3. All appropriate permits must be obtained before construction. Obtaining a county permit does not replace or over-ride other state and federal statutes and regulations that may apply to this project.
4. All roads, stormwater facilities, conveyance systems, and grading plans shall be designed and stamped by a **Washington State Licensed Civil Engineer** and shall be submitted for county engineering review and approval prior to construction. Final plans should include a construction Stormwater Pollution Prevention Plan (**CSWPPP**) for all areas of work.

Stormwater

5. All development shall comply with **Whatcom County Code (WCC) Chapter 20.80.630** as well as the **2019 Stormwater Management Manual for Western Washington (SWMMWW)**. As more than 5,000 square feet of impervious surface are proposed, Minimum Requirements 1-9 of the 2019 SWMMWW will apply.



6. For all stormwater management conveyance systems and/or infrastructure installed, the applicant shall complete and record a **Declaration of Covenant and Grant of Easement** for stormwater maintenance purposes. The document is required to be recorded prior to issuance of any Certificate of Final Occupancy.
7. For all stormwater management conveyance systems and/or infrastructure installed, as per WCDS Chapter 2, Section 205, the applicant shall post a **Stormwater Maintenance Security** with the PW Engineering Services division for any stormwater conveyance system and/or stormwater management facility. The security shall be for the amount of 10% of the engineer's construction cost estimate or \$5,000, whichever is greater. The security shall be in effect for two (2) years from the date of provisional acceptance of the completed development.
8. A Stormwater Site Plan (**SSP**) shall be submitted for county review clearly indicating existing and proposed impervious surfaces and surface type(s), existing and proposed drainage features and stormwater facilities on site including an assessment of the current condition of any existing features proposed to be retained for continued use, setbacks from existing/proposed stormwater facilities, designated parking and vehicle circulation path(s), and all other above ground features and below ground utilities on the site. The final **SSP** must include an **Engineered Stormwater Design Report** prepared in accordance with **Whatcom County Code 20.80.630** and directly addressing how the development will comply with minimum requirements 1-9 of the **SWMMWW 2019** for new development.
9. The project as proposed will require a designated **Consulting Engineer** at the time of construction. Refer to WCDS Chapter 2 Section 206 and WCDS Chapter 5 Section 511 for all of the responsibilities of the Consulting Engineer which include but are not limited to **preparing revisions, documenting required inspections and testing, providing construction compliance assurance correspondence, furnishing completed stormwater drainage system cost estimate and Certified Record Drawings (as-built)** for all proposed work. Record drawings shall be provided to and approved by PW Engineering Services upon construction completion, and/or prior to issuance of any building Certificate of Final Occupancy, refer to **WCDS Chapter 5 Section 507-D** for submittal requirements.

Traffic and Access

11. Proposed access/roadway improvements shall be verified to meet current **sight distance criteria, per WCDS Ch. 5**. Any proposed access approach to serve the subject development shall include a paved apron and shall be designed by a Washington state licensed Professional Engineer.



12. Applicant should contact WSDOT regarding any requirements WSDOT may have with regards to hauling routes and traffic impacts. Additionally, any traffic studies, reports or professional documentation that is required by WSDOT for access approval shall also be provided to County PW staff prior to approval.

13. The applicant shall submit the **preliminary traffic and concurrency information form** to confirm associated traffic. It is also recommended that a **traffic narrative** be provided with additional information for County staff to use in the review regarding anticipated traffic volumes/average daily trips (ADT), the type of traffic anticipated including truck trips, trip frequency, PM peak hour trips, and anticipated trip distribution over/through nearby County owned and operated roads and intersections. County Staff will also need to know the anticipated timeline for material hauling, frequency of hauling trips, whether material is being brought into the site or leaving the site via truck or train, and the anticipated hauling route. The form can be found here.
(<http://www.co.whatcom.wa.us/333/Forms>). A final draft of the ITE trip generation analysis for the proposal should also be submitted with the standard form.

If there are questions, please contact Maxwell McGee at either MMcGee@co.whatcom.wa.us or (360) 778-6213. Thank you.