

CITY OF FERNDALE SHORELINE MASTER PROGRAM

APPENDIX



Restoration Plan Public Access Plan

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Restoration Plan

Restoration Plan Overview

The overarching goal of the SMP Restoration Plan is to identify the opportunities for restoring the ecological function for those areas within the City that have experienced degradation. With this in mind, it should be noted that the opportunities for restoration within Ferndale's SMP jurisdiction are limited. In the opinion of the City, the best opportunities for restoration lie outside of Ferndale's limited shoreline jurisdiction.

With the Nooksack River "book-ended" by the Interstate 5 Bridge at the northern terminus of the City's SMP jurisdiction and by the Burlington Northern Railroad Bridge and City Main Street Bridge at the southern terminus, the wild attributes of the Nooksack are, by necessity, severely limited in this area. The City is not able to move any of these bridges and nor would the City want to remove these vital transportation infrastructure structures.

The best opportunities for restoration lies in the City's ability to partner with jurisdictions to the north and south on enhancement projects. In particular, there exists great opportunities for the City of Ferndale to partner with the Lummi Tribe on enhancement projects. The Lummi Nation contains much land that is well suited for restoration projects. The City has and will remain committed to



Isolated Wetland on Riverfront Golf Course

advancing projects that serve this purpose. In particular, the City will be working with the Lummi's on the creation of wetland banking opportunities that should provide an opportunity for off-site restoration and mitigation projects that will benefit the ecology of the river and the area.

Restoration Plan Definitions

As applicable to this Appendix in general and the Restoration Plan specifically, the following terms shall have the following meaning:

"City" shall mean the City of Ferndale.

"Demonstrable" shall mean capable of being demonstrated or proven, clearly evident or obvious.

"No Net Loss of Shoreline Ecological Function" shall mean no demonstrable or significant loss and/or degradation of established or identifiable shoreline ecological function that are the result of development activity.

"Must" means a mandate; the action is required.

"Shall" means a mandate; the action is required.

"Significant" and/or "Significantly" shall mean demonstrable and/or substantial.

"Substantial" and/or Substantially" shall mean clearly demonstratable and/or meaningful in a practical sense.

Restoration Goals, Objectives, & Policies

The City of Ferndale desires to promote the protection and restoration of degraded shoreline ecological functions where appropriate, implementable and practical. To this end, the following goals, objectives, and policies are adopted:

Goal 1

Ensure that "no net loss" of shoreline ecological function results from development within the shoreline jurisdiction.

Objective 1A

Develop regulations and incentives within the SMP that promote the implementation of the "no net loss" goal.

Objective 1B

Encourage the concept of "no net loss" through the identification of current ecological function for development projects proposed within the Shoreline jurisdiction

Policy 1A

Emphasize prevention of degradation of the ecological functions of the shoreline when reviewing shoreline permit application

Policy 1B

Identify appropriate mitigation measures during the permitting process that will encourage no net loss of ecological function

Goal 2

Restore impaired shorelines and improve their ecological function

Objective 2A

Ensure that, if possible, future development within the shoreline jurisdiction improves the ecological functions of impaired areas

Objective 2B

Work with permitting agencies and other regulatory jurisdictions in identifying appropriate mitigation measures for development projects within the shoreline jurisdiction

Policy 2A

Encourage development mitigation measures that serve to enhance native vegetation

Policy 2B

Ensure that the requirements for buffers or other mitigation measures are appropriate and facilitate the achievement of impaired function restoration



Goal 3 Improve water quality

Objective 3A Protect and where feasible restore freshwater habitat and habitat forming processes

Objective 3B Manage and treat stormwater to improve water quality, decrease peak flow and increases the use of stormwater best management practices

View of Tennant Lake and Railroad Tracks

Policy 3A

For development projects within Ferndale's SMP jurisdiction, utilize best available science and best management practices for stormwater treatment and detention

Policy 3B

Priority should be given to protection and restoration of natural process that are needed to support ecosystem and habitat functions which lead to improvements in water quality

Existing & Ongoing Restoration Projects

Most of the existing and future restoration projects are outside of Ferndale's SMP jurisdiction and many are centered in strategies designed to enhance the salmon habitat within the Nooksack River. While these projects will not provide specific projects within Ferndale, they will provide important habitat enhancement projects that will benefit

Ferndale. For a complete listing of the enhancement projects contemplated within our WRIA, please refer to the listings on page 20 through 27.

Degraded Areas and Impaired Ecological Functions

As noted previously, the shoreline areas of the City can be divided into three categories – the Nooksack River, the City's streams (10-Mile, Whiskey, Silver & Schell), and the wetlands within the 100-year floodplain. The following discussion regarding degraded areas will follow this classification.

Nooksack River

As noted, the Nooksack River as it flows through Ferndale is rip-rapped, channalized, and has limited direct access. From an ecological function standpoint, the river primarily serves as a fish passage corridor. There are little or no areas that would provide off-channel refuge or other beneficial habitat/functions. The land holdings along the river are centered in two entities – the City's Vanderyacht Park and the Riverfront Golf Course (private property).

City's Streams

10-Mile Creek – remnants of a formerly man-made lake. The creeks shoreline is within City's SMP jurisdiction but its junction with the Nooksack River is outside of our jurisdiction. The creek is characterized by Reed Canary Grass, is therefore a slow

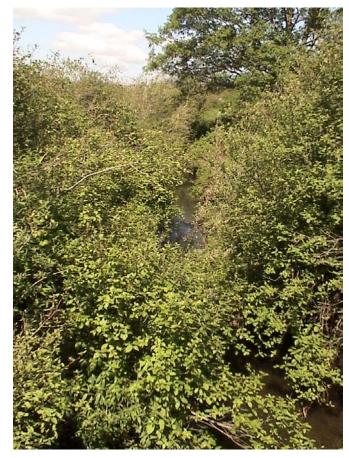
moving stream and has limited salmon habitat function.

Whiskey Creek – Extremely channalized within Ferndale. The creeks terminus with the Nooksack is outside of our SMP jurisdiction and is limited by a culvert under Interstate 5. Does have salmon spawning areas and juvenile salmon habitat.

Silver Creek – Contains adult salmon habitat but is limited by extensive beaver habitat and a pipe that brings the creek under Interstate 5.

Schell Creek – Very limited adult salmon habitat. Connection to Red River and eventually into Lummi Bay is outside of the City's SMP jurisdiction.

Wetlands Within 100-Year Floodplain. Very limited ecological function outside of migrating waterfowl habitat. With these wetlands being isolated from the Nooksack and the majority of



10-Mile Creek

these wetlands in areas of the City which will experience development pressures, offsite mitigation combined with avoidance is the preferred avenue for restoration. If these wetlands are avoided, the inclusion of buffers as required by the City's Critical areas Ordinance would be required. In these instances, the preference will be for native vegetation to be used in the buffer areas to the extent practical.

Potential Restoration Opportunities

As was the case for the degraded habitat discussion, the potential restoration opportunities will also be discussed following the three SMP categories above.

Nooksack River

As noted, the primary function of the Nooksack River as it passes through Ferndale is one of fish migration. Outside of the migration issue, the potential for restoration and enhancement lies in two areas- those potential restoration projects sponsored by the City on City property abutting the Nooksack (primarily Vanderyacht Park), and those restoration and enhancement projects encouraged by the City and on private property.

Regarding the current City-owned property (Vanderyacht Park), there exists potential for increased riparian planting using native vegetation along the river bank and a more ambitious (and expensive) concept of constructing off-channel fingers into the park that would provide refuge for salmon and other freshwater aquatic creatures.

The potential also exist for restoration projects on private property along the Nooksack River. Due to the predominately rip-rapped shoreline along the Nooksack, any private property enhancements would most likely be either on the golf course property or the property owned by Samuels Furniture. In either instance, the City believes that the key to encouraging restoration on these private parcels is to offer development incentives.

Due to the designation of "Conservancy" for these private parcels fronting the Nooksack, most development activity would be precluded. Under the City's incentive-based approach for riverfront restoration, development that normally would not be



Riverfront Golf Course – Looking Toward Nooksack

allowed would be considered if the development is tied to enhancement projects that, on balance, serve to increase the functionality of the river habitat. In this way, future development on "Conservancy" parcels would be allowed if there was a determination that the "net ecological function" of the area under SMP jurisdiction was significantly improved.

City's Streams
For all of the streams within the
Ferndale SMP jurisdiction, the best

opportunities for restoration exist outside of our jurisdiction. This is because many of the stream's confluence with the river are not within Ferndale and/or their upper reaches are also outside of Ferndale's corporate boundary. With this said, there still exist modest opportunities for enhancement of the streams through the planting of native vegetation which should provide shade and shelter for salmon and other organisms. With the buffer requirements contained in the City's Critical Areas Ordinance, the City believes that appropriate opportunities for modest enhancement of the streams ecological function is possible.

Wetlands Within 100-Year Floodplain.

Most if not all of the wetlands within the 100-year floodplain in Ferndale are isolated from the river and therefore have limited ecological function. They do provide flood attenuation and habitat for migrating waterfowl and freshwater organisms. As was the case for the streams, the opportunities for enhancement lie predominately in the buffer requirements in the CAO and any opportunities to enhance the buffers through the planting of native vegetation.

Incentives for Restoration on Private Property

Ferndale has designed the provisions of their SMP using a "no net less of ecological function" approach. With this in mind, the City has determined that any restoration on private property should be tied directly to increasing the function of any shoreline or wetland associated with the site together with incentives to promote the restoration and enhancement. These incentives include permitting limited development in the Conservancy Zone and allowing increased height, lot coverage and decreased setback requirements.

Realizing that in most instances development proposals simply avoid the wetlands or provides mitigation, the City desires to increase the amount and scale of restoration by providing these incentives.

Normally development is precluded in conservancy zone areas. While this serves to keep the status quo related to ecological function, there exists no incentive to actually restore or enhance the ecological function of these areas when they are on private property. As a result, the SMP would permit limited development within the Conservancy Zone when this development is tied to restoration and/or enhancement on-site.

With a "no net loss" philosophy, it is the City's position that development would be permitted within Conservancy Zones if the proposed restoration/enhancement's increase in shoreline/wetland function is greater than any potential decrease in ecological function associated with the development.

By way of example, the Conservancy zone's ecological function along the Nooksack between the I-5 Bridge and the Main Street Bridge is primarily flood attenuation with low wetland/riparian function. There are no areas for salmonid spawning or refuge – only fish migration up and down the river. Any proposed development in this area would need to demonstrate a "net increase in ecological function". Thus if a development

would provide off-channel habitat areas in return for development within the area, it would be allowed if, in the determination of the City, the increase in ecological function associated with off-channel areas is significant and does not substantially decrease the existing flood attenuation function.

Under this approach there is a direct nexus and proportionality between the scale and scope of the development and the scale and scope of the enhancement, with the balance falling in favor of net increase in ecological function. As noted in Section 8.110 of the City's Shoreline Master Plan, water-orientated uses are preferred; however, non-water-orientated uses may be considered as a Conditional Use when they are part of a mixed-use development which includes restoration and/or public access.

Implementation Strategy & Funding

The implementation strategy and funding is also broken down into two classifications – for those projects sponsored by the City on city property and secondly, for those projects on private property.

Projects on City Property

The major city-wide project which currently has an implementation strategy and funding concept is Storm Drainage. In the fall of 2005, the City completed its first-ever Comprehensive Stormwater Master Plan (Storm Comp Plan). The Storm Comp Plan contained a three-prong approach and strategy for tackling the storm drainage issues in Ferndale. The City is now in the process of implementing the Storm Comp Plan's recommendations and, in April of 2006, the City Council adopted the first city-wide storm drainage fees for this purpose.

Realizing that water quality is essential to the beneficial ecological functions of the shoreline in Ferndale, the implementation of a city-wide storm drainage program has far reaching implications.

The Storm Comp Plan included three classifications of activities – initial city-wide storm drainage system cleaning, inspection and correction – eventual construction of storm drainage conveyance piping – and thirdly, the construction of up to 5 large-scale regional storm drainage ponds.

The activities included in the Storm Comp Plan are envisioned to take up to 20 years to complete and will cost over \$8 million. With the institution of the new storm drainage fees, the first phase is expected to begin in 2008.

Projects on Private Property

The strategy for encouraging restoration and enhancement projects on private property were previously discussed but center on an incentive-based approach that would link restoration and enhancement to the allowability of development that (lacking the restoration) would not normally be permitted.

An example would be future development at the Riverside Golf Course or at Samuels Furniture (both located adjacent to the river). If either of these private property owners

were to propose non-water-orientated development of their property, it would most likely be denied based on the "conservancy" designation of the property. If however, a proposed development on these properties were tied to an enhancement project that would improve the ecological function of the land, the development proposal might have merit.

The strategy therefore used by the City for restoration and enhancement projects on private property will be to provide development incentives (allowing development where conceivably prohibited or discouraged) when development projects include a restoration component. The deciding factor used by the City in these instances will be to weigh the benefits of restoration/enhancement vs. the potential negative effects of development. If on balance, the development projects provide significantly more potential benefit vs. potential determent from an ecological function standpoint, the city may permit the project.

As a result of this strategy, the funding for private property restoration and enhancement will lie with the property owner and the ability of the City, together with our permitting partners, to permit appropriate development on parcels previously precluded from development when a significant net benefit to the ecological function of the shoreline can be demonstrated.

Restoration Incentive Program

The following elements of the City's Restoration Incentive Program provide the standards by which such incentives would be reviewed and regulated. As noted in this Appendix, the Restoration Incentive Program is designed to consider limited development in the "Conservancy" areas of the city that, without such an incentive program, would preclude most development opportunities.

Measurement of "Net Gain"

In order for a private developer to make application under the City's SMP Restoration Incentive Program, the following steps shall be necessary:

- A "current status" biological assessment of the site would need to be completed by a consultant who, at the sole discretion of the City and with Ecology consultation, is qualified to determine the current shoreline ecological function(s) of the project site together with the overall shoreline ecological function(s) of the area surrounding the site (i.e. the specific ecological landscape unit). The study boundaries of the "current status report" would be determined by the City in consultation with the land owner and the Department of Ecology.
- A "restoration potential" study would then be completed by a consultant who, at the sole discretion of the City and with Ecology consultation, is qualified to determine the restoration potential for the site in question and the potential increases in shoreline ecological function that are feasible on the proponent's site.

- A "future status" biological assessment of the site and the entire study area included in the "current status" report would need to be completed by a consultant who, at the sole discretion of the City and with Ecology consultation, is qualified to determine the potential future enhanced shoreline ecological function(s) of the project site following the proposed restoration activities as well as the potential negative effects of the land owner's development plan on the site's shoreline ecological function.
- The City would then issue a "net gain" decision that would determine if the future status biological assessment demonstrates a significant afterdevelopment gain in the shoreline ecological function.

Restoration Activities and Specific Development Uses

The specific restoration activities that would qualify for consideration would, naturally, vary from one site to another within the City's SMP jurisdiction due to the varying ecological functions currently in existence. The City has developed the following standards for accessing potential restoration activities.

- First preference would be for restoration activities that enhance, if possible, an existing shoreline ecological function identified on the site in question.
- Second preference would be for restoration activities that provide for beneficial shoreline ecological functions that are not currently observed on the site in question.

The specific development uses that would be considered for the site will also vary given the different areas of the City within the Shoreline jurisdiction. The City has developed the following standards for accessing potential development activities.

- First preference would be for development activities that would not degrade the current shoreline ecological function(s).
- Second preference would be for development activities that would not degrade the current shoreline ecological function(s) nor adversely affect the enhanced ecological functions that are being considered for the site in question.

As an example, should the development that is proposed be precluded in the area (i.e. – development in the Conservancy shoreline designation), any allowed development would need to meet the "net gain" in ecological function defined herein. Should the predominate current ecological function be identified as low quality wetland/riparian habitat, the following conditions will need to be demonstrated:

 The site's primary ecological function is currently (prior to any proposed development) low quality wetland/riparian habitat – as evidenced by the required biological assessment.

- The proposed restoration activity(s) serves to increase the functionality of the wetland/riparian habitat on the site - as evidenced by the required biological functional assessment.
- The potential detrimental effect of the development is less than the potential positive effect of the restoration - as evidenced by the required biological functional assessment.

Another example would be where it is not considered feasible (from an ecological standpoint) to enhance the current primary ecological function but the proponent is proposing enhancements that would provide for ecological function on the site that is not currently observed. In this case, the following conditions will need to be demonstrated:

- The site's primary ecological function is currently (prior to any proposed development) flood attenuation – as evidenced by the required biological assessment and flood modeling.
- It is demonstrated that increasing this ecological function is not feasible (flood attenuation cannot be increased through physical means – there are no artificial structures that could be removed or other means of increasing this function).
- The proponent is proposing to create and/or enhance another ecological function on the site (i.e. – creation of off-channel refuge, etc.)
- The potential detrimental effect of the development is less than the potential positive effect of the restoration in this case, flood modeling has shown that the proposed development will not lessen the flood attenuation, that the off-channel proposal will significantly enhance the biological function and that the off-channel project does not have the affect of diminishing the primary ecological function (flood attenuation).

Should, in the City's determination, this significant net gain be demonstrated, the City could permit the development to occur as a Conditional Use having additional flexibility concerning the current limitations in the City (i.e. – setbacks, height limitations, floor area ratios, etc.).

Timelines & Benchmarks

The timeliness for restoration projects contemplated by the City (i.e. storm water management) will commence in 2007 and will be on-going for many years. The timelines for restoration projects contemplated by private parties is more uncertain and would, by necessity, be tied to the land owners willingness to consider development projects that could lead to restoration. The benchmarks for both categories of potential enhancement and restoration will be the net increase in the ecological functionality of the properties.

Public Access Plan

Public Access Overview

Given the three classifications of shorelines within Ferndale (i.e. – Nooksack River, Various Streams, &100-Year Floodplain Wetlands), public access is only deemed

appropriate for areas of the Nooksack River. Given that the overriding principle for public access under the Ferndale Shoreline Master Program is access without net loss of shoreline function, direct public access to the streams and the 100-year floodplain wetlands are not deemed to be appropriate. There does however exist current and potential direct and indirect public access opportunities on public property for areas of the Nooksack River as it runs through the City of Ferndale.



As will be demonstrated in this section, the existing and contemplated public access opportunities on public property within the City are many and will carry out our desire to provide public access to the Nooksack River. In addition, the City believes that an incentive program for access on private property along the Nooksack River would be appropriate.

Classification of Shoreline Uses and Access

Shoreline uses includes three broad classifications; water-dependent, water related, and water-enjoyment. With the Nooksack River being a wild and scenic river, the ability for either water-dependant or water-related uses is severely limited – suffice it to say that the City does not currently have any businesses that could be deemed water-dependant or water-related. The City also believes that the potential for future water-dependent or water-related commercial enterprises to be very limited. Even with this limitation, the City does provide water-enjoyment opportunities along the portion of the Nooksack that flows through the City.

Water-enjoyment activities can either be active (direct physical access) or passive (water view). In all instances, both direct and indirect water-enjoyment access is provided via existing public property along the Nooksack River.

Public Access Principles

The principles of public access within Ferndale are centered in the ability of the public to gain physical access to the river on public property and the ability of the public to enjoy viewing the river at various points in the City on public property. With the City owning four (4) public parks (Vanderyacht, Hastings, Centennial Riverwalk, & Pioneer Park) either directly on the Nooksack or adjacent to the river, the principle of promoting public access while protecting private property rights can be achieved. In addition, views of

the river are afforded from the Main Street Bridge as it crosses the Nooksack. Please refer to the map on page 18 for existing public property along the Nooksack River.

Regarding the provision of public access to the River on private property, due to the reasons outline above, the City does not believe that it is appropriate or necessary to tie increase public access (active or passive) to private development within the SMP jurisdiction. With this said, the City would like to provide incentives to private property owners to provide increased public access to the River. These incentives are outlined below and include enhanced development opportunities tied to increased public access.



Current Public Access Needs & Opportunities

The Nooksack River extends for approximately 6,200 feet as it passes through Ferndale (from the I-5 Bridge to the north to the PUD water intake point to the south). Of this, public property directly on the River constitutes approximately 3,800 feet (see map on page 18).

Railroad Bridge - Vanderyacht Park in Background

Existing Public Access on Public Property – Within Ferndale SMP Jurisdiction
This existing public property along the Nooksack provides for both active and passive
public access. Active public access is provided at Vanderyacht Park while passive
public access is provided at Hastings Park, the Centennial Riverwalk, Pioneer Park, and
from the Main Street Bridge.

Existing Public Access on Public Property – Adjacent to Ferndale SMP Jurisdiction

Abutting Ferndale to the south (as a result, just outside of Ferndale's SMP jurisdiction) is Whatcom County's Hovander Park. Formally a family farm, Hovander Park includes 720 acres and has over one mile of river frontage on the Nooksack. While direct access to the river is limited, a trail along the river affords many views of the Nooksack.

In addition to Hovander Park, there exists a State of Washington boat launch on the Nooksack which lies just outside of our SMP jurisdiction. This boat launch naturally affords active access to the Nooksack River. See the map on page 19 for the location of Hovander Park and the State of Washington boat launch.

Existing Public Access on Private Property

The largest private land holding along the Nooksack River as it passes through Ferndale is the Riverfront Golf Course. Golf courses are unique in so far as they, by nature, provide passive and active access to their surroundings. In the case of Ferndale, this passive public access includes views of the River. Naturally due to the nature of the game, this access is limited to actual players and does not include the general public on an unrestricted basis.

Access Needs

With the extensive amount of relatively unrestricted public access on public property and the somewhat restricted public access on a selected private property, access to the River is numerous and varied.

Incentives for Public Access on Private Property

As noted, there exists many opportunities for public access to the Nooksack River both within Ferndale and in its immediate surroundings. Accordingly, it is the City's position that increased public access on private property along the Nooksack is not necessary.

With this said, it is also the position of the City that increased public access on private property would serve to promote the public interest. As a result, the City would like to encourage increased public access to the River on private property through incentives that would balance increased public access on private property in exchange for increased development opportunities on private property along the Nooksack.

This incentive approach would permit increased development within "conservancy" zone along the river when combined with public access. For projects that includes Public Access and whose affect yields a net increase in ecological function, the height, setback, and lot coverage limitations would be set at the next highest use category (see matrix on page 89 of SMP). For example, a project in the Conservancy Zone that qualifies for incentives would be bound by the height, setback, and lot coverage limitation of the Rural classification.



View of Vanderyacht Park from Hastings Park

As noted in the Restoration Plan section of this document, it is the City's position that it would permit development within the Conservancy zone along the Nooksack in return for restoration and enhancement on site. Through this provision, the increased functionality of the shoreline as a result of the restoration/enhancement would permit the development to occur. Under this scenario, increased shoreline functionality would be the net result of development allowability.

Allowing or increasing public access to the shoreline does not inherently carry with it a probability of increased shoreline functionality however. The function of the shoreline is not necessarily increased through public access but it is not necessarily reduced either. In many ways it is the form of the public access that dictates an increase or decrease in

shoreline functionality. In many instances, direct active access to the shoreline may serve to reduce the functionality of the shoreline while indirect passive access to the shoreline may have no net effect on the shoreline functionality and may serve the public interests (water view is considered a public benefit).

As a result, it is the position of the City to not tie increased public access on private property to the allowability of development within the shoreline conservancy zone but rather to tie increased public access to the shoreline on private property with the scale of the allowed development and the nature of the public access. Under this arrangement, developers who provided public access would be granted bonus height allowability, bonus reduced setback, and/or bonus lot coverage ratios.

The bonus allotments would be tied to the level of public access (active or passive, direct or indirect) with a larger bonus for direct, active access and smaller bonuses for indirect, passive access.

For example, should a development proposal come forward on private property along the Nooksack, it would be deemed appropriate to allow the development in return for restoration/enhancement of the shoreline. Additionally should there be an additional public access opportunity, the City would consider modifications to the scale of the development.

With this said, it is important to ensure that the bonus allowability does not serve to reduce the functionality of the shoreline. Thus, using the above example, the provision for active direct access to the Nooksack could be tied to a bonus height limitation allowing an additional story to be added to the building. This height increase would not, in this example, serve to degrade the perceived function of the shoreline (flood attenuation) while increased lot coverage or reduced setback (both of which would increase the building footprint) could degrade the shoreline functions.

Overall however, the City does not deem it appropriate to tie the requirement for both restoration/enhancement and public access to the allowability of development in the Conservancy zone. On balance (due to overall function of the shoreline) the City considers restoration/enhancement to be more important than public access.

Potential Public Access Opportunities

While public access opportunities on private property may be limited, opportunities do exist for increased public access to the shoreline on public property. What follows is a brief outline of the known future public access opportunities on public property.

Whatcom County Pedestrian and Bicycle Bridge Across the Nooksack

Whatcom County, through an advisory committee, has proposed a footbridge across the Nooksack linking Hovander Park with Pioneer Park (and then on to Vanderyacht Park via the Riverview Plaza and Trail). This bridge would be constructed near the PUD water intake point since this is the closest point across the river as it flows through Ferndale. Please refer to Attachment B for more information.

Washington State Coast Millennium Trail (CMT)

The CMT currently runs north from Bellingham through Hovander Park and then out to the Cherry Point area. As part of the Whatcom County Pedestrian and Bicycle Nooksack River Bridge project (discussed above), the CMT's route could be altered to include passage through Ferndale along the Nooksack River and then out to the coast.



Nooksack River as it flows through Ferndale