

To: Lucy McInerney
Site Manager
Department of Ecology, Northwest Regional Office
3190 160th Avenue SE
Bellevue, WA 98008

Transmitted Via Email to: <http://cs.ecology.commentinput.com/?id=TuipA>

19 March 2019

RE: I and J Waterway Cleanup Site - Cleanup Action Plan

Dear Lucy McInerney,

Thank you for taking the time to consider our comments on the I and J Waterway Cleanup Action Plan (CAP).

RE Sources for Sustainable Communities is a local organization in northwest Washington, founded in 1982. RE Sources works to build sustainable communities and protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy, and action. Our North Sound Baykeeper program is dedicated to protecting and enhancing the marine and nearshore habitats of northern Puget Sound and the Georgia Strait. Our chief focus is on preventing pollution from entering the North Sound and Strait, while helping our local citizenry better understand the complex connections between prosperity, society, environmental health, and individual wellbeing. Our North Sound Baykeeper is the 43rd member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has over 20,000 members in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

We are pleased about the extensive amount of soil monitoring that took place at this site to determine the types, quantities, and locations of the contaminants of concern. The Draft Cleanup Action Plan answered many of our questions about the proposed cleanup activities but there are a few places where we have concerns or places where we would like additional information and/or clarification.

Treated wood:

We strongly feel that all treated wood should be removed from the cleanup site. This includes the pilings that are in the Head of Waterway Unit (the pocket beach) along with the treated wood that is a part of the bulk head in the South Beach Unit. Since 2004, there has been a state-wide effort lead by the



Department of Natural Resources to get these toxic materials out of our waterways as they continue to leach chemical compounds into beach and marine sediments¹. Creosote is known to be toxic to native fish development² and is likely one of the sources of the polycyclic aromatic hydrocarbons that are found in exceedance at the cleanup site. In fact, Figure 2-5 shows that the area adjacent to the creosote wood bulkhead has some of the highest cPAH levels in the site. The CAP has written that the I and J Waterway will be used as habitat for juvenile salmonids as well as provide people a place for beach play and clamming opportunities. To ensure this site is clean enough and remains clean enough to meet these objectives, it is necessary to remove this treated wood alongside the other planned cleanup efforts.

Dredging in a naturally forming cap:

The proposed cleanup action plan states that the Navigational Channel East Unit and both Coast Guard units will not be dredged or capped but rather will be monitored for a naturally-forming cap. We wonder how a cap can form if the sediment is being periodically removed to maintain the navigation channel at -18 feet MLLW? Or if the dredging could potentially become an exposure route for contaminated sediments to the environment, especially benthic organisms? The last dredging event occurred almost 30 years ago, which leads us to believe it will need to be dredged in the near future. Alternatively, if the natural accumulation of sediment is expected to not be enough to need dredging, will there be enough natural accumulation to form an adequate cap over the contaminated sediment? Please clarify.

Contaminant removal:

Based on the maps in the CAP document the Berthing, Dock, Floating Dock, South Bank, and Head of Waterway units all have the highest level of contaminants, especially cPAHs. We feel that all of these units should be dredged to sufficiently remove the worst contamination. Allowing a naturally-forming cap does not technically mean that the area is recovering; the contaminated sediment is just being buried under cleaner sediment. In addition, if another dock is going to be placed here, it will be subjected to propeller action which will disturb the naturally forming cap. We feel the safest method, therefore, is to remove more of the contaminated sediment than the proposed cleanup action plan recommends.

Need for clearer, more transparent language:

There are a few places in the document where we felt the language could be clearer. For example, in the following quotes from the CAP: "The proposed cleanup action considers current and future community land-use, navigation, maintenance dredging infrastructure, and habitat enhancement" and "The proposed cleanup action considers erosional forces." In both phrases the term "considers" does not imply that any action will actually take place to address these important issues. It would be helpful to provide some examples so that the public (and our organization) fully understands what measures will be taken.

Because recontamination of the site is an important concern, we would also like to have more details on how stormwater will be managed and what upgrades are in the works. The CAP states that Ecology will "Continue to administer stormwater upgrades, maintenance, and best management practices under NPDES permits to identify and reduce contaminants into the site." Like above, it would be really helpful to describe what these upgrades will look like and what BMPs will be administered to minimize the input of dioxins and other contaminants.

We would also like to be assured that climate change and sea level rise have been taken into consideration when designing the cleanup plan, specifically the cap height on the Head of Waterway Unit. Higher tides, bigger storm surges, and larger rain events could all impact these cleanup efforts.

Thank-you for reading our letter and giving our concerns consideration. We value this public comment process and believe that it strengthens community engagement and involvement in the cleanup of Bellingham Bay.

Sincerely,

Kirsten McDade, Pollution Prevention Specialist
Eleanor Hines, North Sound BayKeeper, Lead Scientist
RE Sources for Sustainable Communities

References:

¹ DNR. Creosote Removal Project.

<https://www.dnr.wa.gov/programs-and-services/aquatics/restoration/creosote-removal>

²Vines, C.A., Robbins T., Griffin, F.J. and Cherr, G.N. 2000. The effects of diffusible creosote-derived compounds on development in Pacific herring (*Clupea pallasii*). Aquatic Toxicology. Vol 51, Issue 2, pp 225-239.