

To: Bellingham School District

- Dr. Greg Baker, Superintendent (Greg.Baker@bellingshamschools.org)
- Ron Cowan, Executive Director of Capital Projects & School Facilities (Ron.Cowan@bellingshamschools.org)
- School Board (board@bellingshamschools.org)

1306 Dupont St  
Bellingham, WA 98225

*Transmitted Via Email*

December 3, 2018

## **RE: Proposed Renovations to School District's Bus Fleet and Transportation Maintenance Facility**

Dear Bellingham School District:

Thank you for taking the time to consider our comment on the improvement plans for the School District Bus Fleet and Transportation Maintenance Facility located on the banks of Whatcom Creek. 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 43<sup>rd</sup> 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 requesting that you postpone your decision to invest any money on the current bus facility until all environmental impacts have been assessed and that all other alternative locations for the facility have been fully researched and analyzed.

As members of the Clean Water team at RE Sources we are particularly concerned about the toxic contaminants that are entering Whatcom Creek from the storage and maintenance of diesel school buses. These contaminants include: diesel particles, heavy metals (copper, zinc, lead, Iron, cadmium, chromium, nickel, and manganese), petroleum products, polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), rubber, and asbestos.



Whatcom Creek is the largest creek in Bellingham city limits and is an icon to many residents for cultural, recreational, and sustenance reasons. Since the tragic pipeline explosion in 1999, Whatcom Creek has been transformed through several restoration efforts. Riparian vegetation has been planted and maintained all along the creek except for a few isolated places - a car dealership and the school district bus facility. While Whatcom Creek water quality has improved over the last twenty years it is still classified by the Department of Ecology, as an impaired body of water because it does not meet temperature requirements for spawning salmon<sup>1</sup>. The impervious surfaces and lack of shade on the bus facility are contributing to these elevated temperatures<sup>2</sup>.

In the larger scope, stormwater pollution is the number one pollutant of the Salish Sea and is contributing to the decline of our native salmon and orca populations<sup>3</sup>. Controlling stormwater is problematic because it occurs in relatively small dosages across the greater landscape. But to address this pollution concern we need to tackle each dosage at a time which means taking responsibility for the toxic contaminants that are entering the creek from this facility. Stopping the pollutants from entering the water is much more efficient than removing them once they have entered.

We understand that you have an obligation to voters to renovate this bus facility but we have spoken to Bellingham voters and while they agree that they voted to renovate the bus facility they did not knowingly vote to continue to pollute Whatcom Creek. We believe that if Bellingham voters understood the entire story they would not support investing considerable public funds to maintain this unsustainable facility. Voters also look to the School District to make role model decisions inside and outside the confines of the classroom walls.

There are a variety of measures that can be taken to reduce the amount of stormwater that enters Whatcom Creek from this site such as installing rain gardens, green roofs, buffers, permeable concrete, or filters. It is our understanding that none of these measures are in the current renovation plan and that the site is undersized so many would be unfeasible. This further supports the need to relocate this facility to a site that is more environmentally friendly and more fiscally responsible.

Thank-you for considering our request to stop all progress on renovating the bus facility located on the banks of Whatcom Creek. We look forward to working with you to find a solution to this stormwater pollution source because as you know "together we achieve more than alone."<sup>4</sup>

Sincerely,

Kirsten McDade, Pollution Prevention Specialist  
Ander Russell, Clean Water Program Manager

Citations:

<sup>1</sup>Department of Ecology Impaired Bodies: Retrieved from: <https://fortress.wa.gov/ecy/approvedwqa/ApprovedSearch.aspx>

<sup>2</sup>City of Bellingham Stream Monitoring Program. 2015. Retrieved from:

<https://www.cob.org/Documents/pw/environment/water-quality/2015-urban-stream-monitoring-program-report.pdf>

<sup>3</sup>Control of Toxics in Puget Sound. 2011. Retrieved from: <https://fortress.wa.gov/ecy/publications/documents/1103055.pdf>

<sup>4</sup>Bellingham Promise. Retrieved from: <http://bellingshamschools.org/wp-content/uploads/2018/02/BellinghamPromise.pdf>