

To: Mark Adams
Site Manager, Cornwall Avenue Landfill
Washington State Department of Ecology
Transmitted Via Email to: mark.adams@ecy.wa.gov

February 22, 2018

RE: Cornwall Avenue Landfill Cleanup Site - Engineering Design Report

Dear Mark Adams,

Thank you for taking the time to consider our comment on the Cornwall Avenue Landfill Cleanup Site Engineering Design Report managed by the Washington Department of Ecology.

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 appreciate the time and effort taken to put the Engineering Design Report out to public comment. Overall the Engineering Design Report addresses our concerns for human and ecological health; however, we have a few concerns that we would like considered, outlined below.

The grading of the park is designed to have a minimum of a 2% slope to promote drainage. The idea is to mitigate stormwater through sheetflow, this method of stormwater management would promote direct flow of untreated stormwater into Bellingham Bay. Our concern is that the stormwater will carry non-point source pollutants such as fecal coliform bacteria and litter, both of which are very common at Bellingham Parks, directly into the Bay without any filtration. Non-point source pollution can have negative effects on the ecosystem and economy. Litter can cause entanglement, malnutrition, and death in

wildlife. Fecal coliform bacteria can cause human and pet illness and closure to shellfish harvesting (NOAA 2016). A possible solution to this would be for the future park to include a riparian buffer that would allow for some filtration before the stormwater goes into the Bay; we understand that a decision to include riparian buffers would be made after the cleanup has happened and the City of Bellingham begins park planning and development.

There are still two alternatives to shoreline armoring within the Engineering Design Report with the Groin Alternative being the primary choice over the Baseline Alternative. We support the Groin Alternative. The Groin Alternative allows for a more intact upper intertidal zone, providing forage fish spawning beds and connectivity between pocket beaches within Bellingham Bay (Johannessen et al. 2014). We ask that if the final design opts for the secondary choice, the Baseline Alternative, that environmental mitigation be done elsewhere to enhance the upper intertidal zone within Bellingham Bay. Consideration for habitat connectivity should also be taken into account for the Alternative chosen with the possibility for solutions to fish migration impediments as habitat is needed where possible in Bellingham Bay to lessen distances between habitat fragments.

We are concerned about the timeframe of the scheduled marine construction phase and the possibilities of weather delays. The Engineering Design Report states a timeline of September 15, 2019 through February 15, 2020; this is when Bellingham often gets high wind storms and freezing temperatures. With such a short window, we are concerned about the potential of weather delays which ultimately would delay the final cleanup end date until marine construction can resume during another window of in-water work allowed by the permit(s). A contingency plan for any additional work that is not completed during the permitted timeline is therefore suggested.

Our final concern is the possibility of puncturing the geotextile fabric layer of the semipermeable cap. If the fabric did become punctured, mitigation would be costly and expose humans to potential landfill gas and leachate exposure. Once the site cleanup construction is complete, there are still many ways the fabric could become punctured including humans/animals digging holes down to the fabric, backhoe digging in the park construction phase of the site, boats running aground or dropping and pulling anchors, movement of large rocks within the shoreline armoring due to wave action, and vegetation roots. Signage and enforcement must be stringent to ensure humans are not the cause of the fabric becoming punctured. A wide perimeter designated "no anchoring" to ensure drifting boats do not wash up ashore. And thicker soil layer atop the semipermeable cap where larger vegetation, such as trees, are planted.

We appreciate the versatility of the design to adapt to sea level rise and a change in landfill gas composition and volume. The Engineering Design Report selected cleanup methods that are above the minimum requirements which ultimately will better protect our environment and citizens.

Thank you for your time and consideration. We appreciate this opportunity for public comment and efforts to protect both human and environmental health.

Sincerely,

Eleanor Hines
Lead Scientist
RE Sources for Sustainable Communities

References:

National Oceanic and Atmospheric Association. 2016. NOAA Ocean Service Education: Nonpoint Source Pollution. <https://oceanservice.noaa.gov/education/kits/pollution/04nonpointsource.html>

Johannessen, J. , A. MacLennan, A. Blue, J. Waggoner, S. Williams, W. Gerstel, R. Barnard, R. Carman, and H. Shipman. 2014. Marine Shoreline Design Guidelines. Washington Department of Fish and Wildlife, Olympia, Washington. Marine Shoreline Design Guidelines. <https://wdfw.wa.gov/publications/01583/wdfw01583.pdf>.