

To: Mr. Cris Matthews, Site Manager
WA Department of Ecology
913 Squalicum Way, Unit 101
Bellingham, WA 98225
Transmitted via e-comment system

June 5, 2018

RE: Blaine Marina Inc. Cleanup Site

Dear Mr. Matthews,

Thank-you for the opportunity to comment on the interim action cleanup for the Blaine Marina Inc. Cleanup Site. We appreciate your willingness to address public comments, and we appreciate all your efforts in the cleanup processes. We particularly appreciate the posting of the public meeting presentation to the site information website

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.

With the proximity of the Blaine Marina Inc. to shellfish beds, salmon bearing streams, City of Blaine, and Semiahmoo Bay, we appreciate the dedication the Department of Ecology and Port of Bellingham are putting towards these cleanup efforts. We are concerned that there is potential for tidal fate and transport of on-site toxics that could have impacts on nearby critical habitat, maintained shellfish beds for harvesting and human consumption, and human activity near the site. We ask that the utmost caution is taken to prevent contaminants from interacting with surface and ground water during cleanup actions, and if such contamination takes place, proper steps are taken to notify stakeholders and to contain the toxics.

Non-contaminated soil that is extracted from the ground will stay on-site until the excavation stage of the clean-up process is complete and then will be used as fill. We ask that any soil, sand, clay, or silt materials that are stored on-site for later backfill be covered to prevent erosion from water or wind. With on-site storage of this material, there is the risk of suspended sediments entering the nearby waterways, by implementing Best Management Practices these materials will stay on-site rather than getting into the water.

We are also concerned about the timing of this project in regards to the Model Toxics Control Act (MTCA) just beginning a multi-year revision. It is likely that MTCA regulations and cleanup standards will be changed in the coming years, so we ask that any anticipated changes to MTCA be taken into consideration so that the cleanup of the site will meet acceptable limits to prevent this site from needing further cleanup efforts.

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

Sincerely,

Eleanor Hines,
North Sound Baykeeper, Lead Scientist
RE Sources for Sustainable Communities