

To: John Guenther
Project Manager
Department of Ecology
913 Squalicum Way, Unit 101
Bellingham, WA 98225
Submitted via online comment form

November 6, 2018

RE: South State Street Manufactured Gas Plant Cleanup Site ID #2865 Remedial Investigation/Feasibility Study

Dear Mr. Guenther,

Thank you for taking the time to consider our comment on the South State Street Manufactured Gas Plant Cleanup Remedial Investigation/Feasibility Study. 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.

Upland Unit:

The remedial investigation showed that the steep slope connecting the upper and lower parts of the Site have high contamination levels. The proposed cleanup plan is to leave this area as is, covered predominantly in invasive blackberries, which then assumes that this area does not pose a health risk. Global climate change models predict that the Pacific Northwest will be experiencing heavier rain events on a more regular basis. We are concerned that this may lead to landslides and/or migration of contaminants to the lower site of the Upland Unit and/or marine sediment and are requesting that you find a better, more permanent solution for this steep slope area. We recommend that you explore bioremediation techniques or other enhanced natural recovery processes in addition to in-situ soil solidification treatment. We also ask that you consider building armor at the base of the slope that will contain the contaminated soil to help hold back any potentially migrating soil.



The Upland Unit also calls for an average of a 2 foot cap, which may help the portion of Boulevard Park covered by this cleanup to better adapt to sea level rise, but what about the rest of the park that won't be covered with a 2 foot cap? Additionally, what about the existing plants, such as trees, that are presently at the park? Will they remain, and if so, how will contaminant exposure risk be mitigated?

Marine Unit:

The pocket beach in Marine Unit, on the border with the Upland Unit, is extremely popular for kids, adults, and dogs to recreate and we are concerned that the proposed 2 foot cap is not protective enough. A 2 foot cap could easily be dug through by an overzealous child or dog. Also with the uncertainty of sea level rise and potential changes to climate and currents we cannot assume that this beach will always be net depositional. Therefore, we feel this specific area may warrant the more costly procedure of removing and transporting some of the contaminated sediment offsite. This would not only remove some contamination but it would also allow for a larger cap to be put in place.

Offshore recreational mooring is also a concern in the marine unit here as it is similarly for Cornwall Avenue and RG Haley. It is common for sailboats to anchor in this area, particularly during the summer months. We are concerned that offshore anchoring could compromise capping. Proper measures to ensure this does not become an issue should be put in place, possibly including education and outreach to recreational boaters and/or signage on where it is or is not okay to anchor.

Critical Habitat:

Regardless if sediment removal occurs, we would also like assurances that the sediment that is brought in for the cap meets the diverse needs of the beach. The Marine Unit area is a documented forage fish spawning ground¹ and supports a large eelgrass bed. Forage fish and eelgrass both play a critical role in the survival of our dwindling salmon species and orca whales. The imported sediment needs to meet very specific requirements so that both native flora and fauna can thrive. In addition, the sediment needs to be safe for children, adults, and pets to play in.

General Comments:

We found that both the Remedial Investigation (RI) and Feasibility study (FS) were well written and easy to follow. There were 2 places in the RI, however, where a correction or clarification are needed:

- 1) 5.1.1: Shallow Soil. In the second paragraph there is a type, 'dep' should be "deep".
- 2) 5.1.1: Shallow Soil. In the third paragraph it states, "There were no exceedances of screening levels for VOCs, TPH, or cyanide..." However, Figure 19 Soil 0-2 ft bgs shows that VOC's were not analyzed. Table 7 Analytical Results - Soil also reports that VOC's were not analyzed. There is a distinct difference between a contaminant not being analyzed versus it not exceeding screening levels.

We found staff expertise provided on the October 30th tour and public meeting to be very informative and helpful and would only add that having these public opportunities occur at the beginning of the

¹https://wdfw.wa.gov/conservation/research/projects/marine_beach_spawning/

comment period, rather than at the end, would allow people more time to reflect and research before submitting comments. While we appreciate the public meeting slideshow being posted online and efforts to try to livestream, we still encourage Ecology to livestream and record the public meetings in the future for those who cannot attend but are still interested in seeing the public presentation.

While we understand that all 5 remedial alternatives meet the minimum standards established by the Model Toxics Control Act and that Alternative 2 has been selected as the preferred alternative based on a Disproportionate Cost Analysis, we strongly encourage Alternative 2 be considered as a starting point and not an ending point for cleanup actions. We feel that more protective measures could be put in place particularly on the steep slope and the pocket beach. We appreciate your consideration of our recommendations when constructing the next phase of this cleanup process.

Sincerely,

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