

Larry Lonegan

Swift Creek - EXHIBIT A

See attached

November 5, 2019

Swift Creek - EXHIBIT A

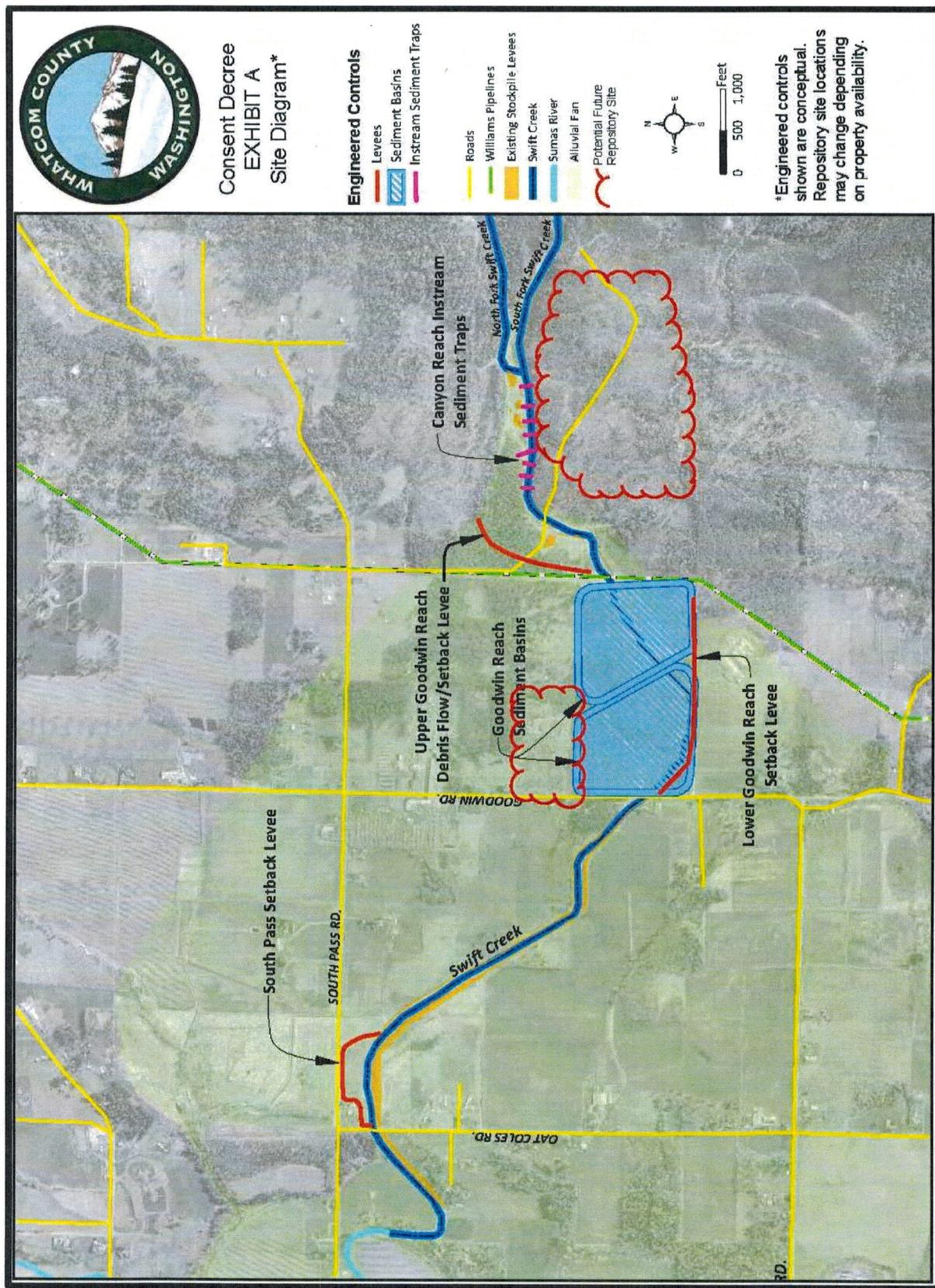
Please refer to the attached Consent Decree EXHIBIT A Site Diagram, and to the attached text explanation entitled Swift Creek Action Plan engineered controls diagram.

Comments regarding such include, but are not necessarily limited to:

1. Per review of Exhibit A, naturally occurring asbestos (NOA) is proposed to be accumulated in a very small and compact geographical area.
2. Such accumulations have the potential of creating serious air quality issues. What will be done to avert such and how timely will such actions be taken? Only recently have I observed capping of accumulations at the South Pass Setback Levee, while such accumulations occurred over many years.
3. Such accumulations have the potential of creating serious water quality issues. As noted on the attached **Whatcom...-Critical Aquifer Recharge Areas**, the accumulations will be on a critical aquifer recharge area and a wellhead protection zone. This can be observed much better on the Internet. What will be done to avert serious water quality issues?
4. The "Upper Goodwin Reach Debris Flow/Setback Levee" appears to be an excessive distance from the Swift Creek. Is there something else here that is not being disclosed?
5. Years ago alternatives such as pits were to be pursued as possible sites for accumulating the NOA. This appeared to be a potentially excellent solution. What happened?



Swift Creek Action Plan



Swift Creek Action Plan engineered controls diagram

This diagram appears in the Consent Decree (legal agreement) between Ecology and Whatcom County.

General Diagram Orientation

General Project Location

The Swift Creek flood control and sediment management project is located east of Everson, WA in Whatcom County.

Swift Creek Path

The North and South Forks of Swift Creek originate from the western slope of Sumas Mountain and join at the base of Sumas Mountain east of Leibrant Road. After joining as one creek, it flows westward for approximately 1,500 feet and then southwest for approximately 3,000 feet. The creek then flows generally northwest for 1,000 feet and flows underneath Goodwin Road. It continues northwest for approximately 6,000 feet and then flows underneath Oat Coles Road. It continues generally southwest another 1,500 feet where it joins the Sumas River.

Roads

Within the Swift Creek Project area, roads running east/west include South Pass Road to the north and Massey Road to the south. Roads running north/south include Oat Coles Road, Goodwin Road, and Leibrant Road (listed from west to east).

Alluvial Fan

At the confluence of Swift Creek's North and South Forks, an alluvial fan extends from the base of Sumas Mountain west of Leibrant Road, north of South Pass Road, and south of Massey Road.

Williams Pipelines

Natural gas pipelines extend from the north to the south through the project area paralleling Leibrant Road for approximately 4,000 feet before crossing Swift Creek at the base of Sumas Mountain.

Engineered Controls

Levees

- South Pass Setback Levee: This levee will be located north of Swift Creek. Oat Coles Road will boarder the levee to the west and South Pass Road to the north. It will be approximately 1,500 feet long.
- Lower Goodwin Reach Setback Levee: This levee will be located south of Swift Creek, extending east of Goodwin Road. It will be approximately 2,500 feet long.
- Upper Goodwin Reach Debris Flow/Setback Levee: This levee will be located north and west of Swift Creek and east of the Williams Pipeline. It will be approximately 1,500 feet long.

Goodwin Reach Sediment Basins

Two sediment basins will be located east of Goodwin Road, west of the Williams Pipeline, and north of the Lower Goodwin Reach Setback Levee. Swift Creek flows generally westward through the sediment basins. The two sediment basins will cover approximately 80 acres.

Canyon Reach Instream Sediment Traps

Multiple sediment traps will be located west of the confluence of Swift Creek's North and South Forks. The sediment traps will extend approximately 1,000 feet before the creek reaches the sediment basins.

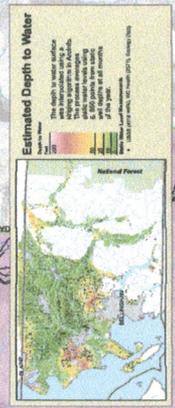
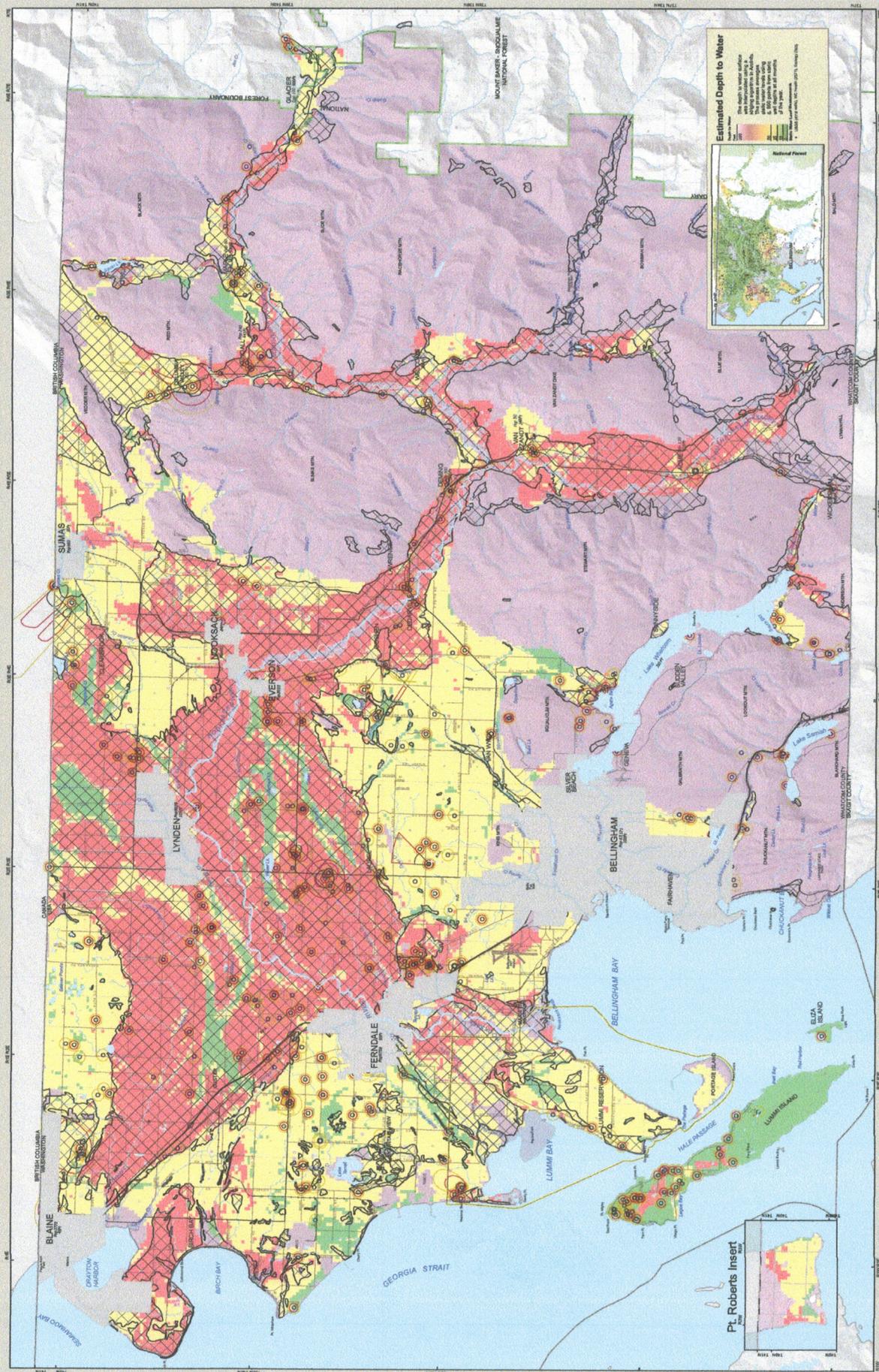
Existing Stockpile Levees

Existing stockpile levees are located on both sides of Swift Creek from the confluence of Swift Creek's North and South Forks on Sumas Mountain to west of Oat Coles Road and within approximately 1,000 feet of the confluence with the Sumas River.

Potential Future Repository Sites

The diagram estimates two potential future repository locations. The first repository could be located north of the Goodwin Reach sediment basins and east of Goodwin Road. This first repository could be 16 acres. The second repository could be located south of the confluence of Swift Creek's North and South Forks and east of the Williams Pipelines. This second repository could be 90+ acres.

WHATCOM CRITICAL AREAS ORDINANCE - CRITICAL AQUIFER RECHARGE AREAS



ARTICLE V - CRITICAL AQUIFER RECHARGE AREAS

- WELLHEAD PROTECTION ZONES**
 - High Susceptibility - 1 Year travel time
 - High Susceptibility - 5 Year travel time
 - High Susceptibility - 10 Year travel time
- AQUIFER SUSCEPTIBILITY**
 - Low
 - Moderate
 - High
 - Susceptibility Unassessed
- GROUND WATER BOUNDARIES**
 - Surficial Aquifers (Mainland only)
 - ACCESSORY MAP SYMBOLS
- Section Lines**
- City Jurisdiction**
- Mt. Baker/Susquehanna National Forest**
- Lummi Nation Boundaries**

The information contained on this map is based on the latest available data. The map is not intended to be used for legal purposes. The map is based on the latest available data. The map is not intended to be used for legal purposes. The map is based on the latest available data. The map is not intended to be used for legal purposes.

Whatcom County Critical Areas Ordinance

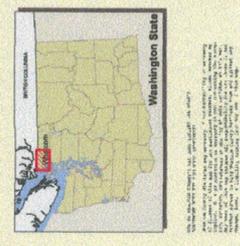
NATIONAL SYSTEM OF NATURAL RESOURCE MANAGEMENT

Scale: 1:62,500

0 1.25 2.5 3.75 Miles

0 1.25 2.5 3.75 Kilometers

Projection - Lambert Conformal Conic, NAD 1983



Whatcom County Critical Areas Ordinance
 Critical Areas Ordinance
 Whatcom County, New Jersey
 2007