

RE: Draft Cleanup Action Plan for the Central Waterfront Cleanup site

Dear Ms. McInerney,

Thank you for taking the time to consider my comments on the Draft Cleanup Action Plan (CAP) for the Central Waterfront Cleanup site located in Bellingham Bay. I have worked in the environmental field for over 30 years as a Professional Engineer with a Master degree. I would like to request a public meeting to discuss the on the Draft Cleanup Action Plan (CAP) for the Central Waterfront Cleanup. In addition, after time to digest the information from the meeting, I believe a public hearing would be useful.

We have made progress on the cleanup efforts on the Bellingham Bay toxic sites, however I believe the plan proposed, which seems to have been selected due mostly to cost considerations leaves much risk to both human health and the environment.

I have concerns that proposed CAP, upon completion of the cleanup, it is expected to take an additional 20 to 25 years for the groundwater to meet human health and environmental standards. The CAP document states that because considerable landfill material will be left in place there will be a continued supply of toxic material that will continue to contaminate the groundwater. This time frame is too long. The Department of Ecology (Ecology) could change the CAP, incorporating a barrier around the area and removing more contaminated material as associated with some of the other alternatives. In addition, a better view of the overall site and the level contaminants found at each site, whether those are metals, petroleum, hydrocarbons, VOC, other contaminants.

The treatment of stormwater to avoid recontamination was not addressed in this document. It should be included in the CAP. This also goes for an assessment of how the effects of seismic activity and sea level rise, including storm surges, could impact cleanup efforts at the site.

Lastly, the fate of the Aerated Stabilization Basin (ASB) has not been determined at this time. It is currently functioning as a settling pond for stormwater which is important as the central waterfront will remain an industrial area with industrial related stormwater runoff. We would like to see the ASB retain this function in addition to providing habitat.

There is very little consideration for providing habitat for wildlife either on land or in the water. I believe that was one of the goals previous expressed by the many citizens who took part in shaping the plans for this area.

Sincerely,
Lynn Billington, PE, MS