

Comments on the Westman Marine Draft RI/FS Document.

These comments on the Westman Marine Site's "Draft Report: Remedial Investigation/Feasibility Study" are being made through the efforts of the members of the Semiahmoo Resort Association/Homeowners Association's Environmental Committee (Environmental Committee) as part of the Public Comment Process whose comment period ends of October 2, 2019. However, due to the timing of the deadline to submit such comments within the period of the Public Comment Period, these comments have not yet been approved by the Semiahmoo Resort Association/Homeowners Association's Board of Directors. Therefore, the below comments represent only the views of David J. Leu, Ph.D. and Mrs. Mary Margaret Leu, MSN, who are members of the above referenced Environmental Committee. These comments have been reviewed and approved by the Environmental Committee and have been submitted to the Board of Directors for approval. If approved, they shall be submitted to the Department of Ecology at that time.

Additionally, these comments have been created with the input, review and approval of Mrs. Alicia Rule, Blaine City Council, Member at Large. She is the city council's designated interface with the Port of Bellingham.

The Westman Marine site is identified by the Department of Ecology as Facility Site ID: 66519819; Cleanup Site ID: 2205.

These comments are presented in response to the review of the aforementioned document (referred to below as RI/FS); the September 4, 2019 site tour conducted by the Department of Ecology; and a follow-up meeting held with the Department of Ecology, the Port of Bellingham (POB), and the Environmental Committee's representative, David J. Leu, Ph.D. on September 11, 2019.

The comments are based on the desire to protect: 1) human health and the environment; 2) the recreational resources located in and around Drayton Harbor, including swimming beaches along the Sandy Spit area and adjacent to the Semiahmoo Resort Area; 3) the potential impacts to the commercial fishing fleet and the pleasure boat fleet in Blaine Harbor; 4) the commercial oyster beds and wetlands in Drayton Harbor and fisheries in Semiahmoo Bay; 5) the various private operations being conducted within Blaine Harbor, including a desire to continue the boatyard operations on the subject property; and 6) a desire that the POB continues its ownership and environmental stewardship of the Blaine Harbor area.

We are concerned with the potential impacts dredging of contaminated sediment may have on Drayton Harbor and Semiahmoo Bay waters and environs. The RI/FS fails to adequately address how the dredging discharge waters will be managed and monitored and fails to identify what mitigation measures may be required if such discharge waters could negatively impact the waters of Drayton Harbor and Semiahmoo Bay. Drayton Harbor and Semiahmoo Bay waters are very sensitive because they include the recreational areas in and around Drayton Harbor and the Sandy Spit area, the commercial oyster beds in Drayton Harbor and nearby wetlands. We understand the POB is anticipating that a monitoring plan on such waters will be required when that agency goes through the design and then permitting stages of this site's cleanup. We request that we be notified when the draft monitoring plan is created so that it be shared with our Environmental Committee for review and comments. This is especially important to us given not only the potential impacts of the identified contaminants of

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principal concern but also the potential pathogen pathway such discharged waters may present to the recreational areas of Drayton Harbor including the Sandy Spit area, the commercial oyster beds and the fisheries of Semiahmoo Bay. The pathogens may originate from the bird feces in sediments located in and around the proposed dredging area. There is a large nesting population of cormorants and sea gulls which occupy Blaine Harbor's outer breakwater adjacent to the Westman Marine site which may have impacted such sediment.

We are also concerned with how the dredging project may impact the ability of commercial and pleasure boats to enter and leave Blaine Harbor and would like to see how the management of the dredging operations will be conducted to minimize such impacts.

We strongly suggest that the remediation option for the uplands portion of the site include asphaltting the entire site. It appears that the selected remedial option identified in the RI/FS, called U-1, would leave surface soils exposed to future contamination caused by boat maintenance activities. We saw during the site tour that boats currently being stored and/or worked on at the site have just a thin layer of plastic sheeting under them to collect and contain contaminants such as spilled oils, solvents, fuels and removed paint chips. Such a system is not viewed by us as adequate protection of the soils and a more permanent solution, such as asphaltting the exposed soils within the work area is desirable.

Also, we ask that you please update your list of bird species found in and around the vicinity of the Westman Marine site. There are numerous electronic databases which lists birds of the Drayton Harbor area, one being EBirds.

Thank you for allowing us to submit these comments. Any response to comments may be submitted to:

- 1) Dr. and Mrs. David J. Leu, 8668 Great Horned Owl Lane, Blaine, WA 98230; tel: 605-400-2907
- 2) Alicia Rule, Blaine City Council, Member at Large, 435 Martin St., Suite 3000, Blaine, WA 98230, tel: 360-296-1995