

RE Sources for Sustainable Communities

Please see attached file

To: Cris Matthews
Site Manager
WA Department of Ecology
913 Squalicum Way, Unit 101
Bellingham, WA 98225

Transmitted Via Online Public Comment Form: <http://cs.ecology.commentinput.com/?id=x2VEh>

2 Oct 2019

RE: Westman Marine Inc Remedial Investigation/Feasibility Study

Dear Cris Matthews,

Thank you for taking the time to consider our comments on the Remedial Investigation/Feasibility Study (RI/FS) for Westman Marine Inc located in Blaine, WA. We are encouraged by the amount of research and investigation that went into creating this document and we are confident that this will result in a much cleaner and ecologically productive site.

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.

In regards to the section "Tides, Flooding, Storm Surge, Tsunamis, and Climate change" we noticed that the information used for projected sea level rise is outdated (2007 and 2008) and may under represent actual sea level rise. Washington Coastal Hazards and Resilience Network has developed site-specific sea level rise information based on data from 2014¹. When looking at the site-specific scenarios for Drayton Harbor the likely range of sea level rise over the next 100 years for a low carbon dioxide emissions scenario is 1.1-3.7 feet and for a high carbon dioxide emissions scenario is 2.0-4.8 feet. Both of these



ranges encompass higher values than the 2.4 foot rise that was used to formulate the cleanup plans for this site.

The infrastructure located on Westman Marine is extensive and could potentially contribute toxics to the Bay if inundated with water (petroleum products, anti-fouling agents, PCBs etc...). Washington Coastal Hazards Resilience Network recommends that low-probability projections should be used for high-impact situations such as these to minimize expensive damage to infrastructure and recontamination of the environment. ***Therefore, we strongly urge you to consider a sea level rise of at least 3.3 feet, the value that has a 50% probability given a high carbon dioxide emission scenario¹.***

Drayton Harbor has a thriving but tenuous oyster industry that could be adversely affected by the cleanup efforts in the Bay. Additionally, recreational shellfish harvest was reopened in recent years to the public at Semiahmoo Spit in Drayton Harbor. Because oysters are filter feeders, suspending contaminated sediments could result in contaminated oysters and other shellfish that would harm these local commercial and recreational industries. Please include a detailed plan on how sediments will be contained during the sedimental removal stage of the cleanup process.

We appreciate the effort that went into writing this very thorough and comprehensive document. The use of photos, diagrams, and tables supported the dialogue very well and added to the complete story. To further increase the readability of the document we suggest that you limit the use of acronyms. In a 398 page document it is very cumbersome to have to keep scrolling to the top to translate sentences. There are numerous sentences such as this one that are really difficult to read unless one has memorized all the acronyms:

"IHS concentrations in both subunits of SMA-1 exceeding the SCOs are mostly limited to the upper 1 ft of sediment, although in some areas extend to a depth of approximately 2.5 ft. All exceedances of the CSLs for PBTs are also contained within SMA-1." (p. 11-2)

Thank you for reading our comments and taking our recommendations into consideration. We appreciate being able to have an active role in the fate of the toxic cleanup sites in Whatcom County and are encouraged by the progress made to make these documents more accessible to local citizens.

Sincerely,

Kirsten McDade
Pollution Prevention Specialist
RE Sources for Sustainable Communities

¹Washington Coastal Hazards Resilience Network. Retrieve from:
<http://www.wacoastalnetwork.com/wcrp-documents.html>