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

Transmitted Via Online Public Comment Form: <http://tcp.ecology.commentinput.com/?id=9fZWc>

20 July 2020

**RE: South State Street Manufactured Gas Plant Cleanup Action Plan and SEPA Determination**

Dear John Guenther,

Thank you for taking the time to consider our comments on the draft Cleanup Action Plan (CAP) addressing legacy contamination largely originating from a historic gas manufacturing plant on the northern part of the popular Boulevard Park.

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We work to protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy, and action. Our priority programs include Protecting the Salish Sea, Freshwater Restoration, Climate Action, and Fighting Pollution—all critical issues affecting our region. Our North Sound Baykeeper is also a member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has thousands of supporters in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

We are pleased that this popular park has entered the cleanup phase of the Model Toxics Cleanup Act (MTCA) and with all the hard work that was involved to get to this point. While we agree with most of the actions outlined in the draft CAP we have a few comments and concerns that we would like to mention.

On page 7 of the draft CAP, it states that the biologically active zone in the marine sediments is considered to be the upper 12 cm in regards to the point of compliance for the protection of human health when gathering and eating seafood. Most of the clams people harvest in this area, however, are found deeper than 12 cm<sup>1</sup>. Likewise, the point of compliance for protection of human health with respect to direct contact is the upper 45 cm of marine sediment in the intertidal areas. Being a parent, I have personally witnessed

sandplay that results in children digging far deeper than 45 cm. If the sediments can not be guaranteed to be safe beyond these depths, we recommend that signage be placed to warn people of the potential exposure to contaminated seafood and sediments.

In Section 5.4.4 Remove Remnant Gas Holder it mentions that the 1 gas holder still standing will be assessed for the presence of non-aqueous phase liquid (NAPL) and will be mostly if not totally removed. Is there any possibility that there are contaminants such as NAPL at the location of the other 2 gas holders? Will there be an investigation of this and if contaminants are found what will be the course of action?

For the sloped area of the cleanup site, we would like to see all of the invasive plants, especially the Himalaya blackberries, removed and replaced with native plants. We think it is unwise to have an edible plant growing in contaminated soils and replacing them with native plants (without edible berries) not only reduces this risk but will also provide more habitat opportunities for wildlife.

We strongly encourage Ecology to pursue a living or softshore stabilization project over a hardshore one. Over a quarter of Washington's shorelines have already been destroyed with hardshore armoring and we feel that this is an excellent opportunity to create a more aesthetic and ecologically functioning shoreline.<sup>2</sup> Restoring our native shorelines is an important step to recovering our native forage fish, salmon, and orca populations.

While we can understand the reasoning behind leaving hazardous substances that exceed cleanup levels on the site, we are not in favor of this practice. Leaving this contamination provides an avenue for exposure when there are unforeseen circumstances such as an earthquake or large windstorm that could shift land and uproot trees.

Boulevard park is an iconic, urban park in Bellingham that attracts thousands of visitors every year. Unfortunately, MTCA does not have a metric that recognizes the extreme usage of this park to specialize these cleanup efforts. If there ever was a case to go above and beyond basic standards this it it. We encourage Ecology to take every step possible to make this park the cleanest and safest it possibly can be.

Thank you for your time in reading our comments and all the hard work that has gone into making this public park a much cleaner and safer place for people and wildlife.

Sincerely,

Kirsten McDade  
Pollution Prevention Specialist



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References:

<sup>1</sup>Bivalve Shellfish Identification. Washington State Department of Health.  
<https://www.doh.wa.gov/CommunityandEnvironment/Shellfish/RecreationalShellfish/IllnessPrevention/Identification>

<sup>2</sup>Shore Friendly. Washington Department of Natural Resources, Washington Department of Fish and Wildlife, and Environmental Protection Agency. <http://www.shorefriendly.org/>