



Response to Comments

**Cleanup Action Plan, Consent Decree
Amendment, Prospective Purchaser
Consent Decree**

**Georgia-Pacific West Cleanup Site
Lignin Operable Unit
Bellingham, WA**

Toxics Cleanup Program

Washington State Department of Ecology

Northwest Regional Office

Shoreline, Washington

July 2022



Publication Information

This document is available on the Department of Ecology's website at:

<https://apps.ecology.wa.gov/cleanupsearch/site/2279>

Cover photo credit

- Lignin Operable Unit (left of railroad tracks), April 2022 (Ecology)

Related Information

- Clean-up site ID: 2279
- Facility site ID: 14

Contact Information

Toxics Cleanup Program

Ian Fawley
Outreach Planner
425-324-5901, Ian.Fawley@ecy.wa.gov
913 Squalicum Way, Unit 101
Bellingham, WA 98225

Sandra Matthews
Site Manager
425-223-1999, Sandra.Matthews@ecy.wa.gov
PO Box 330316
Shoreline, WA 98133-9716

Website¹: [Washington State Department of Ecology](http://www.ecology.wa.gov)

ADA Accessibility

The Department of Ecology is committed to providing people with disabilities access to information and services by meeting or exceeding the requirements of the Americans with Disabilities Act (ADA), Section 504 and 508 of the Rehabilitation Act, and Washington State Policy #188.

To request an ADA accommodation, contact Ecology by phone at 360-407-6831 or email at ecyadacoordinator@ecy.wa.gov. For Washington Relay Service or TTY call 711 or 877-833-6341. Visit Ecology's website for more information.

¹ www.ecology.wa.gov/contact

Department of Ecology's Regional Offices

Map of Counties Served



Southwest Region 360-407-6300	Northwest Region 206-594-0000	Central Region 509-575-2490	Eastern Region 509-329-3400
---	---	---------------------------------------	---------------------------------------

Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
Headquarters	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

Response to Comments

**Cleanup Action Plan, Consent Decree Amendment,
Prospective Purchaser Consent Decree**

**Georgia-Pacific West Cleanup Site
Lignin Operable Unit
Bellingham, WA**

Toxics Cleanup Program
Washington State Department of Ecology
Northwest Regional Office
Shoreline, WA

July 2022



DEPARTMENT OF
ECOLOGY
State of Washington

Table of Contents

- List of Figures and Tables 5**
 - Figures.....5
 - Tables.....5
- Public Outreach Summary 6**
- Comment Summary 8**
- Next Steps 8**
- Comments and Responses 9**
 - Comment from: Becky Knight9
 - Comment from: Gwen McEwen9
 - Comment from: Geoff Dennis.....10
 - Comment from: RE Sources (Eleanor Hines).....10
 - Comment from: Liz Marshall.....12
- Appendices 15**

List of Figures and Tables

Figures

Figure 1: Washington's formal cleanup process (download a text explanation¹⁵) 9

Tables

Table 1: List of Commenters 8

Public Outreach Summary

The Lignin Operable Unit is located on the Bellingham waterfront within the Chlor-Alkali Area of the Georgia-Pacific West cleanup site. The Lignin Operable Unit is continuing Washington State's [formal cleanup process](#)² as directed under the Model Toxics Control Act ([MTCA](#)³).

Ecology and the Port of Bellingham (Port) have prioritized cleanup of the Lignin Operable Unit to enable purchase by Mercy Housing Northwest (Mercy) for redevelopment as affordable housing. The Port will clean up the Lignin Operable Unit under a legal agreement (Consent Decree Amendment) with Ecology. After the cleanup, Mercy will purchase a portion of the property from the Port and redevelop it under a legal agreement (Prospective Purchaser Consent Decree) with Ecology.

The Department of Ecology's public involvement activities related to this 30-day comment period (June 20 – July 19, 2022) included:

- **Postcard and Fact Sheet:**
 - US mail distribution of a postcard providing information about the cleanup documents, the public comment period, simultaneous (in-person and online) public meeting, and walking tour to approximately 5,000 addresses including neighboring businesses and other interested parties.
 - Email distribution of the postcard and a fact sheet to 330 people, including interested individuals, local/county/state/federal agencies, neighborhood associations, and interested community groups.
 - The postcard and fact sheet were available digitally through Ecology's [cleanup site webpage](#)⁴.
- **Legal Notices:**
 - Publication of one paid display ad in *The Bellingham Herald*, dated Friday, June 17, 2022.
- **Site Register:**
 - Publication of 4 notices in Ecology's Toxics Cleanup Site Register:
 - Comment Period Notice:
 - June 16, 2022
 - June 30, 2022
 - July 14, 2022
 - Response Summary Notice:
 - August 11, 2022
 - Visit [Ecology's Site Register website](#)⁵ to download PDFs.

² <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process>

³ <https://ecology.wa.gov/mtca>

⁴ <https://apps.ecology.wa.gov/cleanupsearch/site/2279>

⁵ <https://apps.ecology.wa.gov/publications/UIPages/PublicationList.aspx?IndexTypeName=Program&NameValue=Toxics+Cleanup&DocumentTypeName=Newsletter>

- **Media Notification:**
 - Ecology sent a media notice on Thursday, June 16, 2022, to *The Bellingham Herald*, *The Cascadia Daily News*, Western Washington University's *The Planet*, [Northwest Citizen news website](https://nwcitizen.com/)⁶, [Whatcom News website](https://whatcom-news.com/)⁷, and KGMI 790 AM radio station.
- **Media Coverage:**
 - Local media ran online stories about the Lignin Operable Unit cleanup, public outreach, and future affordable housing redevelopment:
 - *The Bellingham Herald* ran an [online story](#)⁸ on June 17, 2022.
 - KGMI 790 AM ran an [online story](#)⁹ on June 17, 2022.
 - *Cascadia Daily News* ran an [online story](#)¹⁰ on June 21, 2022.
- **Social Media:**
 - **Twitter:** Ecology – Northwest Region @ecyseattle posted a [tweet](#)¹¹ on Thursday, June 16, 2022 connecting readers to the comment period including the cleanup site webpage.
 - **Blog:** On Thursday, June 16, 2021, Ecology's Northwest Regional Office posted a Lignin Operable Unit and affordable housing story on [Ecology's blog](#)¹², which has approximately 1,200 email subscribers.
- **Walking Tour and Virtual Tour Video**
 - Ecology collaborated with RE Sources, an Ecology Public Participation Grant (PPG) recipient, on an [on-site walking tour](#)¹³ on June 29, 2022 at noon. RE Sources' tour webpage also included an informational [virtual tour video](#)¹⁴. The virtual tour video featured videos created by RE Sources, interviews with the Port of Bellingham, Mercy Housing Northwest, and Ecology staff, and a public participation video created by Ecology.
- **Simultaneous (In-person and online) Public Meeting**
 - Ecology hosted a simultaneous (in-person and online) meeting Wednesday, June 29, 2022 at 6:30 p.m. from Ecology's Bellingham Field Office and through the Zoom meeting application. Ecology and Mercy Housing staff presented details on the draft Cleanup Action Plan and answered questions about the Lignin Operable Unit. Port staff and consultants were available for questions.

⁶ <https://nwcitizen.com/>

⁷ <https://whatcom-news.com/>

⁸ <https://www.bellinghamherald.com/news/politics-government/article262590012.html>

⁹ <https://kgmi.com/news/007700-ecology-releases-plan-for-toxin-clean-up-on-bellinghams-waterfront/>

¹⁰ <https://www.cascadiadaily.com/news/2022/jun/21/waterfront-cleanup-to-clear-way-for-affordable-housing/>

¹¹ <https://twitter.com/ecyseattle/status/1537479343126917120>

¹² <https://ecology.wa.gov/Blog/Posts/June-2022/Cleaning-up-for-affordable-housing-on-Bellingham-B>

¹³ <https://www.re-sources.org/2022/06/tour-a-bellingham-waterfront-cleanup-site-gp-west-lignin-parcel/>

¹⁴ <https://www.youtube.com/watch?v=FUW5GU0E5SM>

- **Websites:**
 - Ecology announced the public comment period, RE Sources’ PPG walking tour, Ecology’s public meeting, posted the fact sheet and postcard, and made the review documents available on Ecology’s [Georgia-Pacific West webpage](#)¹⁵ and Ecology’s [Public Inputs & Events webpage](#)¹⁶.
- **Document Repositories:**
 - In consideration of public health and safety, Ecology could offer only coordinated in-person review options during the 30-day comment period. Outreach materials and websites directed the public to contact Ian Fawley, Outreach Specialist, for document review assistance.

Comment Summary

From June 20 – July 19, 2022, Ecology invited public comments on a Cleanup Action Plan, Consent Decree Amendment, and a Prospective Purchaser Consent Decree for the Lignin Operable Unit.

Ecology received comments from 5 commenters during the 30-day comment period.

Table 1: List of Commenters

	First Name	Last Name	Agency/Organization/Business	Submitted By
1	Becky	Knight		Individual
2	Gwen	McEwen		Individual
3	Geoff	Dennis		Individual
4	Eleanor	Hines	RE Sources	Organization
5	Liz	Marshall		Individual

Next Steps

Ecology has reviewed and considered the public comments received on the documents. Based on Ecology’s evaluation of the comments, no changes were necessary in the documents, and they are being finalized.

By the end of 2022, the Port of Bellingham plans to complete the engineering design and the cleanup of the Lignin Operable Unit. Then Mercy Housing Northwest plans to purchase a portion of the property from the Port and begin redevelopment, which will continue into 2023.

¹⁵ <https://apps.ecology.wa.gov/cleanupsearch/site/2279>

¹⁶ <https://ecology.wa.gov/Events/Search/Listing>

See graphic below and visit Ecology's [cleanup process webpage](#)¹⁷ to learn more about Washington's formal cleanup process.

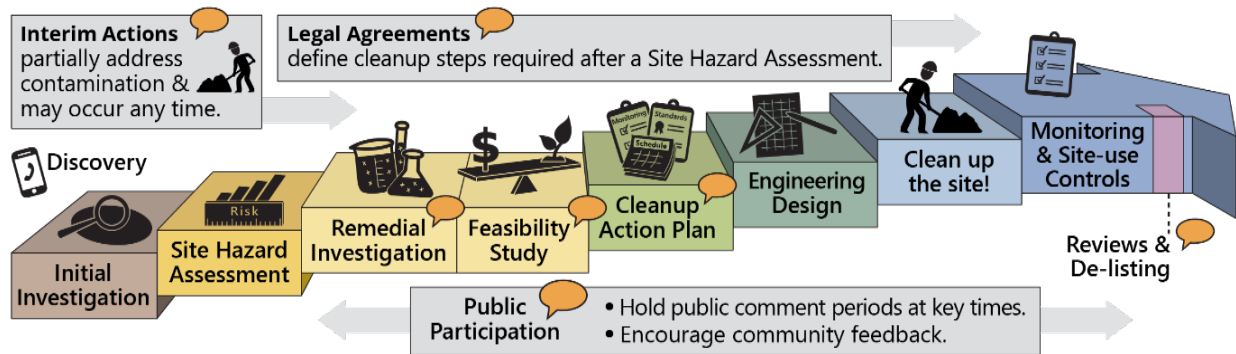


Figure 1: Washington's formal cleanup process ([download a text explanation](#)¹⁵)

Comments and Responses

The public comments are presented below, along with Ecology's responses. Appendix A, page 15, contains the comments in their original format.

Comment from: Becky Knight

These building should not be more then 2-3 stories tall. Anything taller will disrupt the view of the water and destroy the charm of downtown Bellingham. Do not turn us into Seattle!

Response:

Thank you for your comment. These issues do not fall within Ecology's cleanup authority.

Comment from: Gwen McEwen

I am opposed to any housing development in the Bellingham waterfront area. With rising sea levels which sooner or later will possibly flood our waterfront, it is a waste of time and money to build there. The former industrial site does not offer an attractive physical setting. It would take many years for newly-planted trees and plants to mature.

Ideally, you should be looking disrupt the link between poverty/low income and inequality. Homes and various multi-family structures for low-incomes should be scattered throughout Bellingham's neighborhoods and not be so distinctly separate from the community at large, as they would be on waterfront wasteland.

¹⁷ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process>

¹⁵ <https://apps.ecology.wa.gov/publications/SummaryPages/1909166.html>

Response:

Thank you for your comment. The Lignin Operable Unit's cleanup action plan assumes a projected 50-inches of sea-level rise over the next 100-years in accordance with best available science and City of Bellingham requirements.

With regard to placing housing on the waterfront, this is not within Ecology's cleanup authority.

Comment from: Geoff Dennis

As a Bellingham resident whose home overlooks the Lignin site, I am 100% supportive of this project. Bham can use as much affordable housing as it can muster, and I am excited to see this patch of concrete and gravel turned into a vibrant part of our community.

Response:

Thank you for your comment.

Comment from: RE Sources (Eleanor Hines)

[See original formatted comment letter in Appendix A. The comment below has been divided into comment sections to better organize responses.]

Response:

Comment Section 1

Please see attached comments. Thank you for this opportunity.

RE: GP West Lignin Operable Unit Draft Cleanup Action Plan

Dear John Rapp and Sandra Matthews,

Thank you for taking the time to consider our comment on the draft Cleanup Action Plan for the Lignin Operable Unit.

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 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 appreciate this opportunity to comment on the draft Cleanup Action Plan (dCAP) for the Lignin Operable Unit. While there already was a comment period open on the dCAP for the

Chlor-Alkali Remedial Action unit that includes the Lignin area, we greatly appreciate that these updates to the cleanup have been opened to public comment. Generally, we support these cleanup updates. Full removal of the cPAHs will be better protective of our community and environment. We also support affordable housing. [...]

Response Section 1

Thank you for your comment.

Comment Section 2

[...] Monitored natural attenuation (MNA) is still in this dCAP for addressing the metal in soil contaminants and are pleased that a MNA Compliance Monitoring Plan is being drafted. We believe that this MNA Compliance Monitoring Plan should include how residents and community members will be notified if the monitoring shows that metal levels in groundwater are higher than expected and/or are discharged to the Whatcom Waterway. If there are additional cleanup actions taken to address the metals for this area, we hope that another public comment period will be opened and the public will be able to learn about the contamination and the plan to protect human health and the environment. [...]

Response Section 2

Additional cleanup actions would represent a change to the Cleanup Action Plan (CAP) and would require a CAP amendment with associated public review.

Comment Section 3

[...] This dCAP states that the levels of chromium went significantly down between testing in 2009 and 2010 to testing in 2022, but doesn't provide much more information. We wonder where chromium and the other metals leaching from soil into groundwater went over that period of time. Did they end up in the Whatcom Waterway? Did they contaminate the adjacent Pulp and Tissue Mill, other areas of the Chlor-Alkali Remedial Action Unit, or are they sequestered somewhere? [...]

Response Section 3

Previous investigations at the GP West have indicated scattered concentrations of common urban metal contaminants including chromium at concentrations above MTCA unrestricted screening levels. These occurrences of chromium are likely attributable to the Site's location within an urban setting over the past century. There is no indication that the chromium from this area is entering the Whatcom Waterway. There are multiple wells downgradient of the Lignin parcel, closer to the waterway that do not show chromium exceedances. Metal generally prefer to be sorbed to the soil than dissolved in groundwater. The pH of an area impacts the amount of metals dissolved in the groundwater. The pH in the well has dropped from 9 in 2010 to a more neutral 7 in 2022. The lower concentrations of chromium in 2022 from those in 2009/2010 are likely a result of the complex geochemical regime including pH that affect the distribution of metals including chromium to attach to the soil instead of dissolving in the groundwater. Groundwater MNA compliance monitoring will continue until

the requirements for the monitoring program, as defined in the MNA Compliance Monitoring Plan, have been met.

Comment Section 4

[...] Thank you for your time and consideration. We look forward to the cleanup of this site and seeing affordable housing going in on this site.

Sincerely,

Eleanor Hines
North Sound Baykeeper, Lead Scientist
RE Sources

Response Section 4

Thank you for your comment.

Comment from: Liz Marshall

[See original formatted comment letter in Appendix A. The comment below has been divided into comment sections to better organize responses.]

Comment Section 1

Hello: My comments are in the attached. Thank you for inviting community comments.

It is always great to invite community input especially in this locale since there are many experts in Bellingham.

I am not an expert, but do enjoy cleanups wherever they are achieved. I reside across the way from the lignin site. As restoring habitats for fish, birds, and other aquatic life is part of the plan in what Ecology and the Port are doing, it will great to see this parcel's decontamination especially as it is surprisingly scheduled to be completed by the end of this year.

Response Section 1

Thank you for your comment

Comment Section 2

The Port, City, of Commerce and others are driven primarily to make money from Port enterprise. I would more to prioritize tree preservation and additional canopy cover, shoreline enhancement, wildlife corridors and other natural aspects, but this type of prioritization has not held sway.

I have observed tall conifer trees removed from various Port parcels and it is often done in Spring. It would be nice to preserve tall native trees, but if they are absolutely unwanted by those in charge, then it should at least not be done during nesting season. I have a question about the neighboring conifers along Cornwall Avenue and on the property where the

Opportunity Council building is. Does anyone know whether they will be protected during these actions or what destiny for those tall trees in future?

Birding tourism is a money-making opportunity that could be added to cruises, bike parks, markets, marinas, hotels condos, affordable housing, concerts, fireworks, parades, and races. There are impressive statistics on how much revenue can be realized from activities and sales related to birding. Moreover, with killer heat waves in North America and Europe (along with local officials' ambition to bring in more residents and businesses) people will flock here in ever-increasing droves. They will want the promised prosperity and cool weather. Many nature lovers will among them.

First we would need to care about birds, of course, and the plants, fish, tidal pools, and insects and so on which provide them sustenance. All of this is dependent on viable ground and groundwater It seems to me that we are taking natural foundation services for granted.

Response Section 2

The cleanup of the Lignin Operable Unit addresses potentially harmful levels of contamination in order to protect people, plants and animals. The other issues raised are not within Ecology's cleanup authority.

Comment Section 3

I also wonder whether building affordable housing in a brownfield/tsunami tideland is actual compassion for low-income and formerly homeless people. It is easy to understand the financial value for investors and developers; my guess is they could make equal profit building away from the waters edge. A "resilient city" could weave it all together as is happening in NYC and other cities. I saw this news on LinkedIn, for example: <https://citylimits.org/tag/resilient-edgemere-plan/>

I saw a tourist's video of the 2005 tsunami in Indonesia. Such a disaster can happen extraordinarily fast and without warning. Living next to a major railway is also fraught with difficulty I live further away from the tracks than residents, children, and business people in the planned complex will be I experience stress from noise, rumblings, and very special dust. A train wreck, like earthquakes, might also a risk.

Response Section 3

The Lignin Operable Unit's cleanup action plan assumes a projected 50-inches of sea-level rise over the next 100-years in accordance with best available science and City of Bellingham requirements.

Sea-level rise and tsunamis will be considered in the Lignin Operable Unit's future engineering design.

Comment Section 4

Cornwall Avenue street and sidewalk areas have not been adequately cleaned for over two years. If there is a specter of minimal sanitation and more drug-impaired people wandering the streets and/or tenting on Port property and surroundings, while everything ramps up from cement trucks, boulder shipping, government actions at the Cornwall Avenue former landfill and R.G. Haley sites, and perpetual railroad traffic, then there are increased levels of risks to public safety and property associated with these things.

We need more canopy cover, own space, wildlife corridors, and revitalization of vital things. The Secretary General of the Nations was quoted in a July 22 article as saying "Humanity faces a collective suicide" by not cleaning up their fossil fuel dependence etc. on an overheated earth. I agree with him. <https://www.theguardian.com/environment/2022/jul/18/humanity-faces-collective-suicide-over-climate-crisis-warns-un-chief>

Liz Marshall
98225

Response Section 4:

The cleanup of the Lignin Operable Unit addresses potentially harmful levels of contamination in order to protect people, plants and animals. The other issues raised are not within Ecology's cleanup authority.

Appendices

Appendix A. Public comments in original format

Becky Knight

These building should not be more then 2-3 stories tall. Anything taller will disrupt the view of the water and destroy the charm of downtown Bellingham. Do not turn us into Seattle!

Gwen McEwen

I am opposed to any housing development in the Bellingham waterfront area. With rising sea levels which sooner or later will possibly flood our waterfront, it is a waste of time and money to build there. The former industrial site does not offer an attractive physical setting. It would take many years for newly-planted trees and plants to mature.

Ideally, you should be looking disrupt the link between poverty/low income and inequality. Homes and various multi-family structures for low-incomes should be scattered throughout Bellingham's neighborhoods and not be so distinctly separate from the community at large, as they would be on waterfront wasteland.

Geoff Dennis

As a Bellingham resident whose home overlooks the Lignin site, I am 100% supportive of this project. Bham can use as much affordable housing as it can muster, and I am excited to see this patch of concrete and gravel turned into a vibrant part of our community.

RE Sources

Please see attached comments. Thank you for this opportunity.

Transmitted Via Website: <https://tcp.ecology.commentinput.com/?id=MNWPK>

July 18, 2022

RE: GP West Lignin Operable Unit Draft Cleanup Action Plan

Dear John Rapp and Sandra Matthews,

Thank you for taking the time to consider our comment on the draft Cleanup Action Plan for the Lignin Operable Unit.

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 appreciate this opportunity to comment on the draft Cleanup Action Plan (dCAP) for the Lignin Operable Unit. While there already was a comment period open on the dCAP for the Chlor-Alkali Remedial Action unit that includes the Lignin area, we greatly appreciate that these updates to the cleanup have been opened to public comment. Generally, we support these cleanup updates. Full removal of the cPAHs will be better protective of our community and environment. We also support affordable housing.

Monitored natural attenuation (MNA) is still in this dCAP for addressing the metal in soil contaminants and are pleased that a MNA Compliance Monitoring Plan is being drafted. We believe that this MNA Compliance Monitoring Plan should include how residents and community members will be notified if the monitoring shows that metal levels in groundwater are higher than expected and/or are discharged to the Whatcom Waterway. If there are additional cleanup actions taken to address the metals for this area, we hope that another public comment period will be opened and the public will be able to learn about the contamination and the plan to protect human health and the environment.

This dCAP states that the levels of chromium went significantly down between testing in 2009 and 2010 to testing in 2022, but doesn't provide much more information. We wonder where chromium and the other metals leaching from soil into groundwater went over that period of time. Did they end up in the Whatcom Waterway? Did they contaminate the



2309 Meridian St
Bellingham, WA 98225
(360) 733-8307
re-sources.org

adjacent Pulp and Tissue Mill, other areas of the Chlor-Alkali Remedial Action Unit, or are they sequestered somewhere?

Thank you for your time and consideration. We look forward to the cleanup of this site and seeing affordable housing going in on this site.

Sincerely,

Eleanor Hines
Northsound Baykeeper, Lead Scientist
RE Sources

Liz Marshall

Hello: My comments are in the attached. Thank you for inviting community comments.

It is always great to invite community input, especially in this locale since there are many experts in Bellingham.

I am not an expert, but do enjoy cleanups wherever they are achieved. I reside across the way from the lignin site. As restoring habitats for fish, birds, and other aquatic life is part of the plan in what Ecology and the Port are doing, it will be great to see this parcel's decontamination - especially as it is surprisingly scheduled to be completed by the end of this year.

The Port, City, Chamber of Commerce and others are driven primarily to make money from Port enterprise. I would be more inclined to prioritize tree preservation and additional canopy cover, shoreline enhancement, wildlife corridors and other natural aspects, but this type of prioritization has not held sway.

I have observed tall conifer trees being removed from various Port parcels and it is often done in Spring. It would be nice to preserve tall native trees, but if they are absolutely unwanted by those in charge, then it should at least not be done during nesting season. I have a question about the neighboring conifers along Cornwall Avenue and on the property where the Opportunity Council building is. Does anyone know whether they will be protected during these actions or what destiny for those tall trees in future?

Birding tourism is a money-making opportunity that could be added to cruises, bike parks, markets, marinas, hotels, condos, affordable housing, concerts, fireworks, parades, and races. There are impressive statistics on how much revenue can be realized from activities and sales related to birding. Moreover, with killer heat waves in North America and Europe (along with local officials' ambition to bring in more residents and businesses) people will flock here in ever-increasing droves. They will want the promised prosperity and cool weather. Many nature lovers will be among them.

First we would need to care about birds, of course, and the plants, fish, tidal pools, and insects and so on which provide them sustenance. All of this is dependent on viable ground and groundwater. It seems to me that we are taking natural foundation services for granted.

I also wonder whether building affordable housing in a brownfield/tsunami tideland is actual compassion for low-income and formerly homeless people. It is easy to understand the financial value for investors and developers; my guess is they could make equal profit building away from the water's edge. A "resilient city" could weave it all together as is happening in NYC and other cities. I saw this good news on LinkedIn, for example:

<https://citylimits.org/tag/resilient-edgemere-plan/>

I saw a tourist's YouTube video of the 2005 tsunami in Indonesia. Such a disaster can happen extraordinarily fast and without warning. Living next to a major railway is also fraught with difficulty. I live further away from the tracks than residents, children, and business people in the planned complex will be. I experience beaucoup stress from noise, rumblings, and very special dust. A train wreck, like earthquakes, might also be a risk.

Cornwall Avenue street and sidewalk areas have not been adequately cleaned for over two years. If there is a specter of minimal sanitation and more drug-impaired people wandering the streets and/or tenting on Port property and surroundings, while everything ramps up from cement trucks, boulder shipping, government actions at the Cornwall Avenue former landfill and R.G. Haley sites, and perpetual railroad traffic, then there are increased levels of risks to public safety and property associated with these things.

We need more canopy cover, open space, wildlife corridors, and revitalization of vital things. The Secretary General of the United Nations was quoted in a July 22 article as saying "Humanity faces a collective suicide" by not cleaning up their fossil fuel dependence etc. on an overheated earth. I agree with him.

<https://www.theguardian.com/environment/2022/jul/18/humanity-faces-collective-suicide-over-climate-crisis-warns-un-chief>

Liz Marshall

98225