



Response to Comments

Periodic Review Report

Holly Street Landfill Cleanup Site Bellingham, WA

Toxics Cleanup Program

Washington State Department of Ecology

Northwest Regional Office

Shoreline, Washington

August 2024

Publication Information

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

<https://apps.ecology.wa.gov/cleanupsearch/site/253>

Cover photo credit

- Holly Street Landfill Site on the Bellingham waterfront, June 2024 (Ecology)

Related Information

- Clean-up site ID: 2925
- Facility site ID: 253

Contact Information

Toxics Cleanup Program

Kristen Forkeutis, Outreach Specialist
425-240-4353, Kristen.Forkeutis@ecy.wa.gov
PO Box 330316
Shoreline, WA 98133-9716

Cliff Nale, Site Manager
425-725-0438, Cliff.Nale@ecy.wa.gov
PO Box 330316
Shoreline, WA 98133-9716

Website: [Washington State Department of Ecology](https://ecology.wa.gov)¹

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](https://ecology.wa.gov)² for more information.

¹ <https://ecology.wa.gov/about-us/contact-us>

² <https://ecology.wa.gov/about-us/accessibility-equity/accessibility>

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

Periodic Review Report

Holly Street Landfill Cleanup Site Bellingham, WA

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

August 2024



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	9
Public Comments and Responses	9
Comment from: Dominique Coulet du Gard	9
Comment from: Suzanne Gray	10
Comment from: Janet Higbee-Robinson	11
Comment from: Kirsten McDade, RE Sources	11
Tribal Comment and Response	15
Comment from: Kristin Lowell, Lummi Natural Resources (LNR).....	15
Appendices	17

List of Figures and Tables

Figures

Figure 1: Washington's formal cleanup process..... 9

Tables

Table 1: List of Commenters 8

Public Outreach Summary

The Holly Street Landfill cleanup site (Site) located near the Bellingham waterfront is continuing Washington State’s [formal cleanup process](#)³ as directed under the Model Toxics Control Act ([MTCA](#)⁴). A cleanup evaluation report, called a periodic review, was completed by Ecology to evaluate whether human health and the environment are being protected. The City of Bellingham (City) and other responsible parties are addressing contamination at the Site under a legal agreement with Ecology.

The Department of Ecology’s public involvement activities related to this Site’s 30-day comment period (June 3 – July 3, 2024) included:

- **Postcard and Fact Sheet:**
 - US mail distribution of a postcard providing information about the periodic review document, the public comment period, and walking tour to approximately 4,824 addresses, including neighboring residents, businesses, and other interested parties.
 - Email distribution of the fact sheet to over 290 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](#).⁵
- **Legal Notices:**
 - Publication of one paid display ad in *The Bellingham Herald*, dated Sunday, June 2, 2024.
- **Site Register:**
 - Publication of 4 notices in Ecology’s Toxics Cleanup Site Register:
 - Comment Period Notice:
 - May 30, 2024
 - June 13, 2024
 - June 27, 2024
 - Response Summary Notice:
 - August 8, 2024
 - Visit [Ecology’s Contaminated Site Register website](#)⁶ to download PDFs.

³ <https://ecology.wa.gov/MTCA-process>

⁴ <https://ecology.wa.gov/mtca>

⁵ <https://apps.ecology.wa.gov/cleanupsearch/site/253>

⁶ <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, May 30, 2024, to *The Bellingham Herald*, *The Cascadia Daily News*, Western Washington University's *The Planet*, [Northwest Citizen news website](#),⁷ [Whatcom News website](#),⁸ [My Bellingham Now website](#),⁹ [Whatcom Watch website](#),¹⁰ and KGMI 790 AM radio station.
- **Media Coverage:**
 - *The Cascadia Daily News* ran a story [online](#)¹¹ on June 13, 2024 about the Holly Street Landfill cleanup site, the current periodic review, and the public comment period following the RE Sources' walking tour.
- **Social Media:**
 - Ecology [posted](#)¹² on X on Monday, June 3, 2024 encouraging readers to comment on the periodic review with a link to the cleanup site webpage for more information.
- **Walking Tour**
 - Ecology collaborated with RE Sources, an Ecology [Public Participation Grant](#)¹³ recipient, on an [on-site walking tour](#)¹⁴ on Thursday, June 13, 2024. The event, hosted by RE Sources, included presenters from both Ecology and the City.
- **Websites:**
 - Ecology announced the public comment period and walking tour, posted the fact sheet and postcard, and made the review document available on Ecology's [Holly Street Landfill webpage](#)¹⁵ and [Ecology's Public Inputs & Events webpage](#).¹⁶
- **Document Repositories:**
 - Copies of the review document and fact sheet (including translations) were available for review at the Bellingham Public Library's Central Branch.
 - Outreach materials also directed the public to contact Kristen Forkeutis, Outreach Specialist, for document review assistance.

⁷ <https://nwcitizen.com/>

⁸ <https://whatcom-news.com/>

⁹ <https://mybellinghamnow.com/>

¹⁰ <https://whatcomwatch.org/>

¹¹ <https://www.cascadiadaily.com/2024/jun/13/19-years-after-cleanup-safety-checks-ongoing-at-holly-street-landfill-site/>

¹² <https://x.com/ecyseattle/status/1797660084442673207>

¹³ <https://ecology.wa.gov/About-us/Payments-contracts-grants/Grants-loans/Find-a-grant-or-loan/Public-participation-grants>

¹⁴ <https://www.re-resources.org/event/tour-of-cleanup-site-at-mouth-of-whatcom-creek-holly-st-landfill-cleanup/>

¹⁵ <https://apps.ecology.wa.gov/cleanupsearch/site/253>

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

Comment Summary

From June 3 – July 3, 2024, Ecology solicited comments on a report evaluating the completed cleanup of the Holly Street Landfill cleanup site near the Bellingham waterfront. We prepared the report to determine if the cleanup, completed by the City of Bellingham (City), in 2005, still protects human health and the environment.

Ecology received the following comments.

Table 1: List of Commenters

	First Name	Last Name	Agency/Organization/Business/Tribe	Submitted By
1	Dominique	Coulet du Gard		Individual
2	Suzanne	Gray		Individual
3	Janet	Higbee- Robinson		Individual
4	Kirsten	McDade	RE Sources	Organization
5	Kristin	Lowell	Lummi Natural Resources (LNR)	Tribe

Next Steps

Ecology has reviewed and considered the comments received on the cleanup evaluation report (periodic review). Based on Ecology’s evaluation of the comments, no significant changes to the document were necessary, and it has been finalized. However, some clarifications about next steps were made to the conclusions section of the document, based on the comments received.

Ecology will work with the City to gather more information as identified in the report.

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

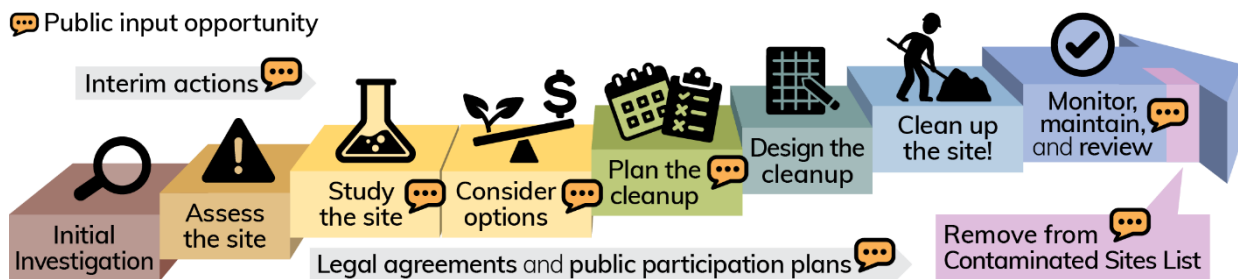


Figure 1: Washington's formal cleanup process

Public Comments and Responses

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

Comment from: Dominique Coulet du Gard

If it weren't for the article in KPUG sent to my Neighborhood newsletter, I would not have heard about this (on June 4th.) I will attend the June 13th RE Sources walking tour/review. At this point, I was aware of the cleanup, but not the plans for the area. Is there a better way for the Dept of Ecology to get this information to us?

Response:

Thank you for your feedback. The WA State Dept of Ecology (Ecology) follows the public notification and participation requirements listed in the [Model Toxics Control Act](#)¹⁸ ([WAC 173-340-600](#)¹⁹) to inform communities about contaminated cleanup sites in their area. The “Public Outreach Summary” section of this document on pages 6 – 7 details the public notification and participation that was implemented for the Holly Street Landfill public comment period. Although we mailed and emailed the surrounding neighborhood associations (see Bellingham’s [Mayor’s Neighborhood](#)

¹⁷ <https://ecology.wa.gov/MTCA-process>

¹⁸ <https://ecology.wa.gov/MTCA>

¹⁹ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-600>

[Advisory Commission](#)²⁰ list) and sent a direct mailer about this comment period to over 4,800 addresses, it is possible that you did not receive the mailer based on your address location. Therefore, the best way to ensure you receive updates about the Holly Street Landfill cleanup site and/or all the Bellingham Bay cleanup sites is to take the following actions:

1. Subscribe to our email list by contacting Kristen Forkeutis, Outreach Specialist: kforkeutis@ecy.wa.gov.
2. Subscribe to Ecology's Contaminated Site Register newsletter: [Site register lists & data - Washington State Department of Ecology](#)²¹
3. Check the Ecology public input and events webpage: [Events Listing - Washington State Department of Ecology](#)²²

We also welcome your specific suggestions for ways to enhance our public notification and participation process.

Additionally, under the Model Toxics Control Act, Ecology oversees the investigation, cleanup, and prevention of sites that are contaminated by hazardous substances to protect people's health and the environment and to preserve natural resources for the future. However, following the cleanup of contaminated sites, Ecology is often not involved with how the sites will be used by the current or future landowners; and therefore, does not notify the public about future land use.

Comment from: Suzanne Gray

From reading this report it seems that there are several potential problems and it's evident that human and environmental health are not protected. For example, copper is a known neurotoxin for salmon. Whatcom Creek has been a salmon-bearing creek since time immemorial. Nobody's health is protected in the Pacific Northwest so long as the salmon are dying. It seems critical that instead of imagining that the copper contamination may not be a problem, that we act very quickly to make sure it is not a problem. Monitoring a toxic waste site over twenty years while doing nothing about it is embarrassing at best, deadly at worst. This is the state and the city's problem. The state and the city need to fix it AT ANY COST.

Response:

Thank you for your comment. As presented in the report, Ecology concurs that copper may still be a concern based on past monitoring data. Ecology has determined that further assessment of current site conditions (including collecting new data) is necessary to determine if the completed cleanup protects human health and the environment. Ecology will work with the City and other responsible parties to gather additional information and data, in order to evaluate what additional remedial actions may be necessary.

²⁰ <https://cob.org/gov/public/bc/neighborhood>

²¹ <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Site-Register-lists-and-data>

²² <https://ecology.wa.gov/Events/Search/Listing>

Comment from: Janet Higbee-Robinson

Restoration work done, especially native plantings, was fantastic! Maritime Heritage Park is a gem for Bellingham. Please continue preserving work done by weeding invasive species. Consider widening planted area along each side of Whatcom Creek from Holly Street well into the park. Add more trees to grassy areas.

Support the longhouse project with park department funds.

Is the beach and shoreline as welcoming to salmon as it can be? Restore natural shore as much as possible for them.

It is already established that the Salish Sea is in peril. Please get to restoration projects as soon as possible to prevent low oxygen levels and extinction of species.

Response:

Thank you for your feedback. As part of the 2005 cleanup, approximately 0.3 acres of upland to intertidal elevations were restored to create side channel habitat, including large woody debris, removing invasive vegetation species, and re-introduced native plants. In addition, the City constructed a boardwalk and viewpoints/overlooks along the estuary to improve public access to the shoreline. No other restoration projects have been conducted to date. However, as the site undergoes future redevelopment, the City will look for other restoration opportunities that can occur at the site.

Comment from: Kirsten McDade, RE Sources



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

To: Cliff Nale
Site Manager
NW Regional Office
15700 Dayton Ave N
Shoreline, WA 98133
cliff.nale@ecy.wa.gov

Transmitted Via Public Comment Form: <https://tcp.ecology.commentinput.com/?id=ZU5i5Hrek>

2 July 2024

RE: Holly Street Landfill Periodic Review

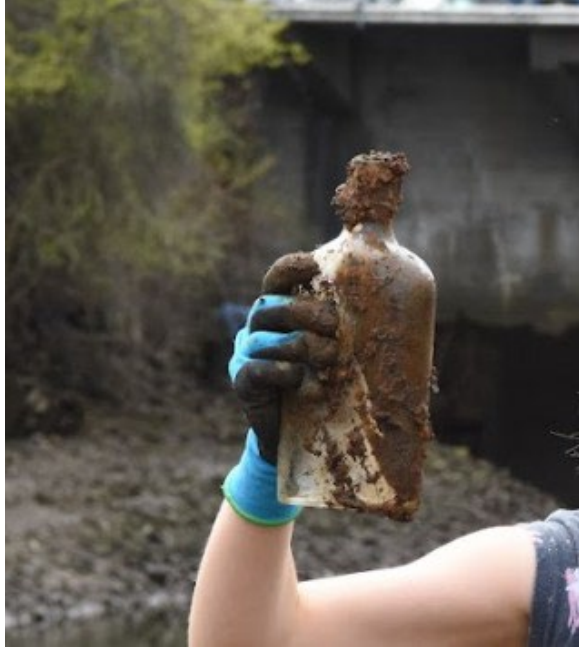
Dear Mr. Nale,

Thank you for taking the time to consider our comments on the First Periodic Review for Holly Street Landfill in Bellingham, WA. We have concerns that this historic landfill may be contributing pollution to Bellingham Bay and would like to see a plan in place to investigate and remediate any pollution problems in a timely manner.

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We mobilize people in Northwest Washington to build just and thriving communities and to protect the land, water and climate on which we all depend. Our priority programs include Protecting the Salish Sea, Freshwater Restoration, Climate Action, and Fighting Pollution—all critical issues affecting our region. Our North Sound Waterkeeper 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.

According to the Remedial Investigation, the interaction of water with the historic refuse is one of the main sources of pollution at this site. After removing over 12,000 tons of waste a cap was placed over the remaining refuse to prevent this water-refuse interaction. We are concerned, however, that this cap is not intact. For the past 5 years, from 2020 to 2024, RE Sources has conducted annual trash cleanups at Maritime Heritage Park. We consistently remove over 200 pounds of trash from this site which is, on average, more than our other cleanup sites. While some of this trash is modern day litter, there is a considerable amount of trash that appears to be historic trash. In 2023, in particular, the cleanup occurred in February during a very low tide. Volunteers collected over 1,000 pounds of garbage in 2 hours. People were finding old, large chunks of industrial metal, tubing and piping, vintage metal dishware, and lots and lots of old glass in the sediment on either side of the creek (both intact bottles and shards). It seemed that people were finding more of this material on the northern bank than the southern bank. While bathymetric surveys performed in years 1, 5, and 9 post cleanup claim the integrity of the shoreline cap is intact, the routine presence of historic garbage on the surface of the sediment challenges this claim. ***We would like to understand the source of this historic garbage being found at our annual trash cleanups and know if it is posing a threat to the water quality of the creek.***

An example of an antique glass bottle excavated from the northern bank of Whatcom Creek during a beach cleanup.



We also have concerns about the stormwater that originates from this area and that is discharged into Whatcom Waterway via the C st outfall. In the 2010 to 2014 Post-Construction Monitoring Report it was noted that a year after the cleanup there were elevated metal concentrations “in a localized erosional area immediately adjacent to a stormwater outfall on the northwest shoreline. To ensure the long-term integrity of the cap, the City subsequently redirected a portion of the storm water flow away from the Site into the larger C street stormwater system.” The Bellingham City IQ Online Map Stormwater layer confirms that the stormwater from the NW region of the Holly Street Landfill Cleanup Site (the approximately 9 acres) flows into the C st outfall. Over the last 3.5 years RE Sources has collected monthly stormwater samples from C st outfall and we have concerns about the water quality being discharged here.

The water coming from the C st outfall has a chronic yellow hue, frequently smells like sulfur and petroleum, and a sheen is often noted at the pool below the outfall. *E. coli* bacteria exceedances are common; 57% of the samples in 2022 and 36% of the samples in 2023 exceeded the Washington State Freshwater standards set at 320 cfu/100 ml. There has also been a white microbial mat documented for most of the 3.5 years growing in the

outfall discharge area. In 2022, a DNA analysis was conducted and the mat consists mostly of the 5 following species: *Methylomonas*, *Pseudomonas*, *Hydrogenophaga*, *Sulfitobacter*, and *Flavobacterium*. Research suggests that these bacteria species are likely growing in response to polluted water. *Pseudomonas* is a known human pathogen.

The C st outfall is hard to access and not many people recreate at the outfall but water quality indicators and standards are also meant to protect the waters in which they discharge into, in this case Whatcom Waterway and the greater Bellingham Bay. ***We would like to see additional testing performed to determine if the Holly St Landfill is the source of this frequently poor water quality that discharges out of C st outfall.*** If not, there could be another pollution source that is currently not understood that needs to be addressed.

Thank you for including additional testing for the source of the dioxin/furan compounds within Whatcom Creek and the Whatcom Waterway. Dioxins and furans are highly toxic at very small quantities (picograms/g dry weight). They can cause reproductive and developmental problems, damage the immune system, interfere with hormones and can cause cancer (World Health Organization). Because they are so toxic at such small amounts, it is not unrealistic that the Dungeness Crab in Whatcom Waterway could be unsafe to eat because of dioxins and furans, this is in addition to the unsafe levels of mercury already measured in crab (Year 5 Compliance Monitoring Report for Whatcom Waterway Cleanup). Currently there is no warning signage at the waterway, or anywhere on Bellingham Bay, and RE Sources staff have witnessed people trapping and harvesting crab from the waterway, presumably to eat. ***We recommend that crab be analyzed for their dioxin and furan content and that the public is made aware of the potential dangers of eating seafood harvested from Whatcom Waterway.***

We agree that a climate vulnerability assessment needs to be conducted for this site and the results of the study implemented into the management strategy. The Federal Emergency Management Agency (FEMA) classifies Whatcom Creek as having a HIGH flood risk. In 1982, the 100-yr flood in Whatcom Creek was estimated to be at 1,429 cfs, however, with more extreme weather events and sea level rise these events will occur more frequently than every 100 years, especially if they coincide with King Tide events. The integrity of the cap and the restoration work could be compromised by the more frequent extreme weather events. Applying and using the Coastal Storm Modeling System (CoSMoS) for this area would be a good starting point.

We also agree with the other recommendations set forth by this review that there is a need for additional sampling of dissolved copper, cPAHs, bis(2-ethylhexyl)phthalate and TPH.

We are grateful that the Holly Street Landfill has been mostly cleaned up and that certain areas have been restored and made into public access areas. This periodic review shows that the

work is not done, however, and that further testing and maintenance needs to be done to ensure that the cleanup is protective of human health and the environment.

This park and surrounding area is very important to the Bellingham Community - it is culturally significant to the Coast Salish People where there used to be a longhouse and for the first time in many years they can harvest Spring Chinook again, a very important cultural ceremony. It is a very popular recreation area for the community and a place where large gatherings and festivals often occur. It houses the Bellingham Technical College fish hatchery and is a refuge for wildlife in the midst of an urban jungle. We hope that the necessary work is carried out to ensure that this area continues to be restored and can thrive both culturally and ecologically.

Sincerely,

Kirsten McDade
North Sound Waterkeeper

Response:

Thank you for your comment and for the detailed information about your findings. As presented in the report, Ecology has determined that further assessment of current site conditions (including collecting new data) is necessary to determine if the completed cleanup protects human health and the environment. Ecology will work with the City and other responsible parties to gather additional information and data, in order to evaluate what additional remedial actions may be necessary. The additional investigations/assessments (such as the climate change vulnerability assessment) should help evaluate the potential of shoreline erosion and related impacts, such as exposing the refuse and stormwater runoff impacting water quality.

Tribal Comment and Response

The tribal comment is presented below, along with Ecology's responses. Appendix A contains the comments in their original format.

Comment from: Kristin Lowell, Lummi Natural Resources (LNR)

We understand your public comment period recently closed for the Holly Street Landfill to determine if the cleanup, completed by the City of Bellingham in 2005, still protects human health and the environment. We are submitting the following comments as a federally-recognized tribe with treaty-reserved rights. After reviewing the 2010-2014 Post Construction

Monitoring Report on the Holly Street Landfill, copper concentrations at your wellpoint monitoring stations are of concern due to the presence of Chinook and Chum salmon species at the Whatcom Creek hatchery which is in close proximity to the Holly Street Landfill cleanup site. We are concerned that dissolved copper present is compromising the olfactory ability of smolts to sufficiently imprint and also affects adult salmon ability to home to the hatchery. We request Ecology resume cleanup efforts for copper to levels below concentrations which are proven to interfere with imprinting and homing behavior.

Kind Regards,

Kristin Lowell
Water Resources Manager
Lummi Natural Resources (LNR)
2665 Kwina Road
Bellingham, WA 98226
Office: 360-312-2128
Kristinl@Lummi-nsn.gov

Response:

Thank you for your feedback. Ecology concurs that copper may still be a concern based on past monitoring data. As presented in the report, Ecology has determined that further assessment of current site conditions (including collecting new data) is necessary to determine if the completed cleanup protects human health and the environment.

Dissolved copper exceeded the cleanup level (3.1 µg/L) at some of the surface water seep monitoring locations during the performance monitoring events completed between 2006 and 2014. Additional seep monitoring to evaluate compliance with cleanup standards is required. Ecology will work with the City and other responsible parties to gather the additional information and data. Up-to-date information and data are needed in order to evaluate what additional remedial actions may be necessary.

Ecology welcomes engagement with tribes throughout the cleanup process. Please contact us if you would like to discuss additional information about the site, or to discuss the level or type of engagement you would prefer regarding the site.

Appendices

Appendix A. Comments in original format

Dominique Coulet du Gard

If it weren't for the article in KPUG sent to my Neighborhood newsletter, I would not have heard about this (on June 4th.) I will attend the June 13th RE Sources walking tour/review. At this point, I was aware of the cleanup, but not the plans for the area. Is there a better way for the Dept of Ecology to get this information to us?

Suzanne Gray

From reading this report it seems that there are several potential problems and it's evident that human and environmental health are not protected. For example, copper is a known neurotoxin for salmon. Whatcom Creek has been a salmon-bearing creek since time immemorial. Nobody's health is protected in the Pacific Northwest so long as the salmon are dying. It seems critical that instead of imagining that the copper contamination may not be a problem, that we act very quickly to make sure it is not a problem. Monitoring a toxic waste site over twenty years while doing nothing about it is embarrassing at best, deadly at worst. This is the state and the city's problem. The state and the city need to fix it AT ANY COST.

Janet Higbee-Robinson

Restoration work done, especially native plantings, was fantastic! Maritime Heritage Park is a gem for Bellingham. Please continue preserving work done by weeding invasive species. Consider widening planted area along each side of Whatcom Creek from Holly Street well into the park. Add more trees to grassy areas.

Support the longhouse project with park department funds.

Is the beach and shoreline as welcoming to salmon as it can be? Restore natural shore as much as possible for them.

It is already established that the Salish Sea is in peril. Please get to restoration projects as soon as possible to prevent low oxygen levels and extinction of species.

Kirsten McDade

Please see the attached document

To: Cliff Nale
Site Manager
NW Regional Office
15700 Dayton Ave N
Shoreline, WA 98133
cliff.nale@ecy.wa.gov

Transmitted Via Public Comment Form: <https://tcp.ecology.commentinput.com/?id=ZU5i5Hrek>

2 July 2024

RE: Holly Street Landfill Periodic Review

Dear Mr. Nale,

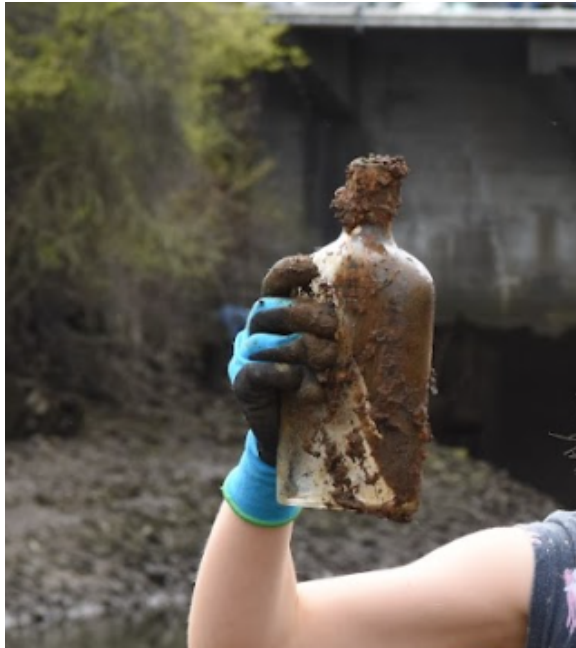
Thank you for taking the time to consider our comments on the First Periodic Review for Holly Street Landfill in Bellingham, WA. We have concerns that this historic landfill may be contributing pollution to Bellingham Bay and would like to see a plan in place to investigate and remediate any pollution problems in a timely manner.

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We mobilize people in Northwest Washington to build just and thriving communities and to protect the land, water and climate on which we all depend. Our priority programs include Protecting the Salish Sea, Freshwater Restoration, Climate Action, and Fighting Pollution—all critical issues affecting our region. Our North Sound Waterkeeper 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.

According to the Remedial Investigation, the interaction of water with the historic refuse is one of the main sources of pollution at this site. After removing over 12,000 tons of waste a cap was placed over the remaining refuse to prevent this water-refuse interaction. We are concerned, however, that this cap is not intact. For the past 5 years, from 2020 to 2024, RE Sources has conducted annual trash cleanups at Maritime Heritage Park. We consistently remove over 200 pounds of trash from this site which is, on average, more than our other cleanup sites. While some of this trash is modern day litter, there is a considerable amount of trash that appears to be historic trash. In 2023, in particular, the cleanup occurred in February during a very low tide. Volunteers collected over 1,000 pounds of garbage in 2 hours. People were finding old, large chunks of industrial metal, tubing and piping, vintage metal dishware, and lots and lots of old glass in the sediment on either side of the creek (both intact bottles and shards). It seemed that people were finding more of this material

on the northern bank than the southern bank. While bathymetric surveys performed in years 1, 5, and 9 post cleanup claim the integrity of the shoreline cap is intact, the routine presence of historic garbage on the surface of the sediment challenges this claim. ***We would like to understand the source of this historic garbage being found at our annual trash cleanups and know if it is posing a threat to the water quality of the creek.***

An example of an antique glass bottle excavated from the northern bank of Whatcom Creek during a beach cleanup.



We also have concerns about the stormwater that originates from this area and that is discharged into Whatcom Waterway via the C st outfall. In the 2010 to 2014 Post-Construction Monitoring Report it was noted that a year after the cleanup there were elevated metal concentrations “in a localized erosional area immediately adjacent to a stormwater outfall on the northwest shoreline. To ensure the long-term integrity of the cap, the City subsequently redirected a portion of the storm water flow away from the Site into the larger C street stormwater system.” The Bellingham City IQ Online Map Stormwater layer confirms that the stormwater from the NW region of the Holly Street Landfill Cleanup Site (the approximately 9 acres) flows into the C st outfall. Over the last 3.5 years RE Sources has collected monthly stormwater samples from C st outfall and we have concerns about the water quality being discharged here.

The water coming from the C st outfall has a chronic yellow hue, frequently smells like sulfur and petroleum, and a sheen is often noted at the pool below the outfall. *E. coli* bacteria exceedances are common; 57% of the samples in 2022 and 36% of the samples in 2023 exceeded the Washington State Freshwater standards set at 320 cfu/100 ml. There has also been a white microbial mat documented for most of the 3.5 years growing in the

outfall discharge area. In 2022, a DNA analysis was conducted and the mat consists mostly of the 5 following species: *Methylomonas*, *Pseudomonas*, *Hydrogenophaga*, *Sulfitobacter*, and *Flavobacterium*. Research suggests that these bacteria species are likely growing in response to polluted water. *Pseudomonas* is a known human pathogen.

The C st outfall is hard to access and not many people recreate at the outfall but water quality indicators and standards are also meant to protect the waters in which they discharge into, in this case Whatcom Waterway and the greater Bellingham Bay. ***We would like to see additional testing performed to determine if the Holly St Landfill is the source of this frequently poor water quality that discharges out of C st outfall.*** If not, there could be another pollution source that is currently not understood that needs to be addressed.

Thank you for including additional testing for the source of the dioxin/furan compounds within Whatcom Creek and the Whatcom Waterway. Dioxins and furans are highly toxic at very small quantities (picograms/g dry weight). They can cause reproductive and developmental problems, damage the immune system, interfere with hormones and can cause cancer (World Health Organization). Because they are so toxic at such small amounts, it is not unrealistic that the Dungeness Crab in Whatcom Waterway could be unsafe to eat because of dioxins and furans, this is in addition to the unsafe levels of mercury already measured in crab (Year 5 Compliance Monitoring Report for Whatcom Waterway Cleanup). Currently there is no warning signage at the waterway, or anywhere on Bellingham Bay, and RE Sources staff have witnessed people trapping and harvesting crab from the waterway, presumably to eat. ***We recommend that crab be analyzed for their dioxin and furan content and that the public is made aware of the potential dangers of eating seafood harvested from Whatcom Waterway.***

We agree that a climate vulnerability assessment needs to be conducted for this site and the results of the study implemented into the management strategy. The Federal Emergency Management Agency (FEMA) classifies Whatcom Creek as having a HIGH flood risk. In 1982, the 100-yr flood in Whatcom Creek was estimated to be at 1,429 cfs, however, with more extreme weather events and sea level rise these events will occur more frequently than every 100 years, especially if they coincide with King Tide events. The integrity of the cap and the restoration work could be compromised by the more frequent extreme weather events. Applying and using the Coastal Storm Modeling System (CoSMoS) for this area would be a good starting point.

We also agree with the other recommendations set forth by this review that there is a need for additional sampling of dissolved copper, cPAHs, bis(2-ethylhexyl)phthalate and TPH.

We are grateful that the Holly Street Landfill has been mostly cleaned up and that certain areas have been restored and made into public access areas. This periodic review shows that the work is not done, however, and that further testing and maintenance needs to be done to ensure that the cleanup is protective of human health and the environment.

This park and surrounding area is very important to the Bellingham Community - it is culturally significant to the Coast Salish People where there used to be a longhouse and for the first time in many years they can harvest Spring Chinook again, a very important cultural ceremony. It is a very popular recreation area for the community and a place where large gatherings and festivals often occur. It houses the Bellingham Technical College fish hatchery and is a refuge for wildlife in the midst of an urban jungle. We hope that the necessary work is carried out to ensure that this area continues to be restored and can thrive both culturally and ecologically.

Sincerely,
Kirsten McDade
North Sound Waterkeeper

From: Kristin Lowell <KristinL@lummi-nsn.gov>

Sent: Tuesday, July 9, 2024 2:19 PM

To: Rogowski, Barry (ECY) <brog461@ECY.WA.GOV>

Cc: Gregg Dunphy <GreggD@lummi-nsn.gov>; Merle Jefferson Sr. <MerleJ@lummi-nsn.gov>; Frank Lawrence III <FrankL@lummi-nsn.gov>; Victor Johnson <VictorJ@lummi-nsn.gov>; Tom M. Chance <TomC@lummi-nsn.gov>; Devin Flawd <DevinF@lummi-nsn.gov>

Subject: LNR Holly Street Landfill Cleanup Comments

External Email

Good afternoon, Barry,

We understand your public comment period recently closed for the Holly Street Landfill to determine if the cleanup, completed by the City of Bellingham in 2005, still protects human health and the environment. We are submitting the following comments as a federally-recognized tribe with treaty-reserved rights. After reviewing the 2010-2014 Post Construction Monitoring Report on the Holly Street Landfill, copper concentrations at your wellpoint monitoring stations are of concern due to the presence of Chinook and Chum salmon species at the Whatcom Creek hatchery which is in close proximity to the Holly Street Landfill cleanup site. We are concerned that dissolved copper present is compromising the olfactory ability of smolts to sufficiently imprint and also affects adult salmon ability to home to the hatchery. We request Ecology resume cleanup efforts for copper to levels below concentrations which are proven to interfere with imprinting and homing behavior.

Kind Regards

Kristin Lowell

Water Resources Manager

Lummi Natural Resources (LNR)

2665 Kwina Road

Bellingham, WA 98226

Office: 360-312-2128

KristinL@Lummi-nsn.gov