SiteWorkshop
LANDSCAPE ARCHITECTURE

MEMORANDUM

Cornwall Ave Landfill Cleanup Site ID: 220

RG Haley International Cleanup Site ID: 3928

February 26, 2025

To: Julia Schwarz, LHG, Department of Ecology Northwest Regional Office

Cc: Gina Austin, P.E., City of Bellingham

Brian Gouran, L.G., Port of Bellingham

Craig Mueller, P.E., City Bellingham

From: Clayton Beaudoin, PLA, Site Workshop

Luke Vannice, PLA, Site Workshop

Gisele Sassen, PLA, AICP, Waterfront Environnemental

Re: **100% Plans Update: Notification regarding Salish Landing Park within Cornwall Avenue Landfill Cleanup and RG Haley Cleanup Action**

Salish Landing Park, Bellingham, Washington

This memorandum formally notifies the Washington State Department of Ecology (Ecology) of the City of Bellingham Parks and Recreation Department's (City) planned construction of the Salish Landing Park (formally Cornwall Beach Park) project (Salish Park) in coordination with remedial actions at two Model Toxics Control Act (MTCA) cleanup sites, the R.G. Haley (Haley Cleanup) and the Cornwall Avenue (Cornwall Cleanup) sites, on Bellingham Bay. The Salish Park footprint covers the upland area (above mean higher high water [MHHW]) and in-water area (below MHHW). The upland areas of Salish Park are located within the Upland Units of both the Haley Cleanup and Cornwall Cleanup sites, and the in-water area is located within the Marine Unit of the Cornwall Cleanup site.

Federal permits for Salish Park were applied for as part of the combined cleanup and park project. In addition, the City has completed the SEPA process and obtained a Shoreline Substantial Development Permit and a Hydraulic Project Approval for Salish Park with the appropriate regulatory agencies. The Salish Park work will comply with the provisions of the permits and approvals received.

This memorandum describes the primary components of Salish Park and how the design and construction will comply with environmental cleanup requirements of the Haley Cleanup and Cornwall Cleanup actions. To maximize public benefit by ensuring the integrity of the cleanup, Phase 1 of Salish Park and both cleanups will be implemented under one contract administered by the City of Bellingham and will be built concurrently by one prime contractor who will maintain all the required environmental controls during construction. Salish Park, Haley Cleanup, and Cornwall Cleanup will have separate plans and bid schedules, ensuring payment is tracked and paid for by the appropriate City agency. The project will have one set of specifications. Construction is planned to start in the 2nd quarter of 2025. Once complete, this project will transform the two cleanup sites into the largest waterfront park in Bellingham.

Salish Park Overview

Site Workshop Landscape Architects, LLC (Site Workshop) is the prime consultant for Salish Park. The cleanup consultants for the Cornwall Cleanup project and the Haley Cleanup project are Landau Associates and Geoengineers, respectively. Recognizing that Salish Park coordination is outside the scope of the remedial action, Site Workshop has collaborated closely with both consultants by including them as sub-consultants for the Salish Park team. The design of Salish Park elements that will be integrated with the environmental cap has been closely coordinated with the cleanup consultants as part of the Salish Park contract.

Salish Park elements in Phase 1 that will be integrated with the environmental cap include 170 linear feet of utility pipe corridors, approximately 90 linear feet of electrical conduit, penetrations for utility pipes, catch basins, manholes, and footings for a utility enclosure, cantilever sliding gate, and volleyball net posts. Future phases of the park to complete the full buildout will occur above the linear low-density polyethylene (LLDPE) geomembrane and will be constructed to not affect the protectiveness of the cleanup. More information on Salish Park elements is detailed below.

Management of Contaminated Soils to Facilitate Park Construction

See 100% Design Set for Salish Park, provided to Ecology on February 14, 2025, for the location of Salish Park elements and the relationship to the upland cap geomembrane system. All Salish Park work that includes excavation of contaminated soil, placement of contaminated soil under the upland cap, and the booting of penetrations through the upland cap will be done based on design details and specifications developed in coordination with the cleanup design and handled by the contractor using the same careful procedures as all other contaminated soil. All Salish Park design and detail elements that will be integrated with the environmental cap, including utility pipe, conduit, catch basins, manholes, and footings, will be constructed per the drawings and specifications of the Salish Park team. Specific Salish Park elements that will involve management of contaminated soils include:

• Footings for sand volleyball posts, as documented in Detail 1 on Salish Park Sheet L3.23, will penetrate the LLDPE cap and will be booted per Cornwall Cleanup Detail 2 on Sheet C-14.

• Footings for the utility enclosure, as documented in Detail 7 on Salish Park Sheet L3.20, will penetrate the Multi-Component Upland Cap. A geotextile demarcation layer will be placed by

the Haley Cleanup at this location to clearly separate clean soil from the upland cap. At the utility enclosure footings, the geotextile demarcation layer will extend up 1 foot along the edge of the footings.

• Footings for the cantilever sliding gate, as documented in Detail 1 on Salish Park Sheet L3.22, will penetrate through the cap geomembrane and be booted (Haley Cleanup Detail 6 on Sheet C-7.7).

• A 10-inch HDPE watermain and several smaller sized service lateral lines will be installed. The system will be connected to the existing City system at Pine Street. Starting at Pine Street, this pipe will be in a clean soil corridor below the geotextile separation layer and LLDPE geomembrane (Salish Park Detail 3 on Sheet C6.5) for approximately the first 260 linear feet into the park. It will then penetrate up through the cap geomembrane and be booted (Haley Cleanup Detail 4 on Sheet C-7.6), as described in Note 13 on Salish Park Sheet C4.2. From this point forward the pipe will be above the LLDPE geomembrane per Salish Park Detail 2 on Sheet C6.5.

• Sanitary sewer gravity main for Phase 1 will consist of 6-inch PVC and 8-inch HDPE pipes with associated manholes and cleanouts. The system will connect to the existing City system on Pine Street. Starting at Pine Street, this pipe will be in a clean soil corridor below the cap (Salish Park Detail 3 on Sheet C6.5) for approximately the first 240 linear feet into the park. At SS-2, the sanitary sewer manhole penetrates the LLDPE geomembrane and will be booted (Haley Cleanup Detail 6 on Sheet C-7.7) as described in Note 2 on Salish Park Sheet C3.2. From this point forward the pipe will be above the LLDPE geomembrane per Detail 2 on Salish Park Sheet C6.5.

- A sanitary sewer force main is planned for Phase 2 of Salish Park. In anticipation of the future pump station, a manhole will be placed at SS-7 as shown on Salish Park Sheet C3.3. The manhole will be booted per Haley Cleanup Detail 6 on Sheet C7.7.

• The drainage system for Salish Park Phase 1 will consist of one catch basin in the northwest corner of the Phase 1 asphalt paved parking area to collect runoff from the parking lot, two catch basins in the vehicle turnaround, and 15- to 24-inch pipes and manholes conveying drainage to the existing City stormwater system in Pine Street. The locations of the catch basins in the turnaround are compatible with the Phase 2 build out of Salish Park. Starting at Pine Street, the pipe will be in a clean soil corridor below the cap (Salish Park Detail 3 on Sheet C6.5) for approximately the first 246 linear feet into the park. At the 8'x 8' Modular Wetland #1, the storm drainpipe will transition from below the LLDPE geomembrane to above the LLDPE geomembrane. The 8' x 8' Modular Wetland will be booted as described in Note 3 and 5 on Salish Park Sheet C2.2 per Haley Cleanup Detail 6 on Sheet C-7.7. From this point forward the pipe will be above the LLDPE geomembrane per Salish Park Detail 2 on Sheet C-6.5. The bottom of catch basins and manhole structures will be below the cap as shown in the Sections on Salish Park Sheet C2.2 and will be booted per Haley Cleanup Detail 6 on Sheet C-7.7. Additional catch basins and manholes that require installation for Phase 2 will be installed above the

geomembrane to eliminate the need to penetrate the upland cap geomembrane during future phases of park development. All future storm drain and sanitary sewer infrastructure will be above the geomembrane.

• Two modular wetland vaults will be constructed to treat runoff from the driveway and the parking area as part of Salish Park Phase 1. Modular Wetland #1 is 8' by 8' (inside dimension). Modular Wetland #2 is 4' by 6' (inside dimension) as shown on Salish Park Detail 1 and 2 respectively on Sheet C6.3. Wetland #1 will be booted per Haley Cleanup Detail 6 on C-7.7 Wetland #2 is within the Multi-Component Upland Cap, but outside the extents of the geomembrane. Within the area of the Multi-Component Upland Cap, a geotextile demarcation layer will be placed to clearly separate clean soil from the upland cap as shown on Haley Cleanup Detail 3 on C-7.4. At Modular Wetland #2, geotextile demarcation layer will extend up 1 foot along the edge of the modular wetland.

• Power and communication conduit for only Phase 1 will be placed as part of Salish Park. Overhead power serves the subsurface Puget Sound Energy transformer vault near the entry to the park. The transformer vault will be installed within the Multi-Component Upland Cap and will have a geotextile demarcation layer that extends up 1 foot along the edge of the vault. Starting from the vault, the conduit will be in a clean soil corridor below the cap for approximately 95 linear feet (Salish Park Detail 1 on Sheet E3.1) to service the electrical enclosure per Salish Park Detail 7 on Sheet E3.1. At the electrical enclosure, the conduit will stub up into the enclosure and be booted per Haley Cleanup Detail 6 on Sheet C-7.7. All conduits leaving the enclosure will be installed above the geomembrane cap per Salish Park Detail 2,3,4, and 5 on Sheet E3.1.

Other Salish Park Project Elements and Construction Methods

Salish Park includes upland, shoreline, and in-water work along Bellingham Bay. Higher intensity uses, including parking, will be developed in the northern portion of the park. The restored South Beach will be the main park amenity in the southern portion of Salish Park along with trails and open space. The Haley Cleanup and Cornwall Cleanup have designed the capping system to slope at a minimum of two percent to reduce the likelihood of ponding of any stormwater that infiltrates down to the LLDPE geomembrane surface. Salish Park elements have been designed to not impede the flow of subsurface water to allow for positive drainage. Salish Park facilities are proposed to be developed as detailed below.

Access and Parking:

• Pedestrian crossings with accessible ramps will be installed at the entry to Salish Park as shown on Salish Park Sheet L1.11.

• An asphalt-paved entry drive and parking lot for 28 vehicles, including two ADA stalls (one standard and one van-sized stalls), and a drop-off area will be constructed in the northern portion of the park. See Salish Park Detail on Sheet C6.2.

• Fill will be imported and placed over the cleanup finished surface to achieve appropriate grades for access and drainage. Two feet of soil will be placed over the upland cap per the cleanup scope as a soil protection layer. Salish Park will place an additional two feet where the parking area is proposed per Salish Park Detail 4 on Sheet L5.52.

• A network of trails will be constructed to connect park facilities and provide access to the shoreline. This includes a 6 to 8-foot-wide shoreline trail meandering through shoreline planting areas (which are installed as part of Haley Cleanup and Cornwall Cleanup scopes), starting at the southern end of the parking lot, and connecting to South Beach. Several trail spurs off the shoreline trail provide direct access to the shoreline. Most trails will be surfaced with crushed limestone per the City of Bellingham standard detail and as shown on Salish Park Detail 1 on Sheet L3.21.

- Low fencing will be installed along trails abutting shoreline buffer plantings to protect vegetation from foot traffic. Fencing installed along the main 14' wide access road is within the cleanup scope, as shown on Sheets L1.11 - L1.18. Other low plant protection fencing is anticipated to be necessary to protect shoreline vegetation as shown on Sheets L1.11 - L1.18 and per Salish Park Detail 5 and 6 on L3.23 and is included as a bid alternative in the Salish Park bid schedule. The City of Bellingham will monitor areas of concern to protect new planting areas as part of ongoing maintenance and monitoring.

Park Amenities

• Two public art pieces called Nootka and Western Stone Garden will be transferred from other parks to be installed at Salish Park. Nootka will be mounted on a footing constructed above the cleanup cap per Salish Park Details 4 on Sheet L3.21. Western Stone Garden will be placed on a crushed surface base course above the cleanup cap per Salish Park Detail 5 on Sheet L3.21.

• On-site salvaged sandstone rock will be placed within landscaped areas and used as informal stone steps or seating per Salish Park Detail 7 and Detail 9 respectively on Sheet L3.21. Part of this salvaged material is currently exposed on the shoreline, and part is buried. Salish Park Specification Section P-32 50 00 – Landscape Boulders requires salvaged material to be tested prior to any re-use to ensure no transport of contaminants.

South Beach

The beach will be constructed over the post cleanup riprap surface and extend towards the existing BNSF railroad rock revetment. This will result in a large beach that has the potential to provide spawning habitat as well as public access. The following components are proposed:

• A low-profile drift sill will be constructed at the western edge of South Beach to stabilize habitat substrate to be placed. The drift sill will consist of armor rock and will be constructed over the post-cleanup riprap surface per Salish Park details on CS3.4. Only a small portion of the drift sill toe will extend beyond the cleanup riprap surface.

• The toe protection of the cleanup surface will be extended to connect to the BNSF railroad revetement. Salish Park had an additional eelgrass survey completed in August 2023 for this area. The findings of this survey showed eelgrass within the Salish Park south beach scope. It is estimated that about 586 square feet of eelgrass will be impacted by the Salish Park project. Mitigation for eelgrass impacted by Salish Park will be implemented as part of the combined cleanup and park project eelgrass mitigation and paid for by the Salish Park project.

• Salvaged on-site concrete rubble and cobble fill will be placed to fill a portion of the gap between the edge of the cleanup containment area and the BNSF railroad rock revetment. The cobble fill will be used outside of the Cornwall Cleanup Project Area. The concrete rubble is currently at the surface near the shoreline and has been exposed to marine water. It will be used as fill within the Cornwall Cleanup Project Area. Larger pieces may need to be broken to minimize voids when placing fill. The assumption is that this material is clean and will not require additional cleanup. The concrete rubble fill will be buried under several feet of beach nourishment. Placement of this material is associated with the Salish Park in-water work and will be permitted as part of the combined cleanup and park federal permit and other permits and approvals specific to Salish Park.

• Beach nourishment consisting of clean imported mixed gravel, gravely sand, and coarse sand will be placed over the entire beach surface.

• Coarse sand will be placed in the upland to create a sandy back beach for public enjoyment. Four footings for two beach volleyball courts will be installed in this area. Where the geomembrane cap is below the south beach extents, the first two feet of sand are included as part of the soil protection layer of the cleanup and will therefore be paid for by Cornwall Cleanup.

• The cobble berm near the eastern edge of the cleanup containment area as called out in Keyed Note #4, 5, and 12 on Salish Park Sheet CS3.1 will be extended waterward to prevent marine water inundation as shown on Salish Park Section A on CS3.2 and Salish Park Detail 5 on CS3.4. The drainage outfall is within the scope of the Cornwall Cleanup.

Planting

Most planting will be accomplished by the Cornwall Cleanup and Haley Cleanup projects as part of required shoreline vegetation, habitat mitigation and restoration. Additional planting for Salish Park is proposed as follows:

• On the Cornwall Cleanup site, soil will be imported to create mounds with a minimum of three-foot depth above the upland cap to support trees. The minimum soil depth is more than double the minimum necessary to support trees but has been specified to prevent root intrusion into the LLDPE geomembrane.

• Approximately 7,650 square feet of upland within the Cornwall Cleanup will be planted with trees, shrubs, and herbaceous ground covering plants.

• Fourteen trees will be installed within the mounded soil areas within the Cornwall Cleanup. Species will all have shallow root structures to preserve the integrity of the cap system.

Permitting

Federal: Per direction from the U.S. Army Corps of Engineers (Corps), the Haley Cleanup, Cornwall Cleanup, and Salish Park have submitted one combined Joint Aquatic Resource Application (JARPA) to apply for a Corps Section 404 permit under the Salish Sea Nearshore Programmatic (SSNP).

State: A separate JARPA to apply for a Hydraulic Project Approval (HPA) from the Washington State Department of Fish and Wildlife (WDFW) was submitted for Salish Park. The Haley Cleanup and Cornwall Cleanup are required to meet the substantive requirements of the Hydraulic Code but are not required to obtain an HPA as they are being performed under MTCA. The HPA application for Salish Park has been obtained.

An Individual Water Quality Certification from the Washington State Department of Ecology for the combined projects has been obtained.

Local: A SEPA Determination of Consistency for Salish Landing Park has been issued by the City of Bellingham (COB) on January 24, 2024.

The Shoreline Substantial Development Permit (SSDP) from COB for Salish Park was approved September 10, 2024.

Constructing Capacity for Future Improvements

Future phases of Salish Park to complete the full buildout of the park will not include any features that will penetrate the upland LLDPE geomembrane and will be constructed to not affect the protectiveness of the cleanup. Specifically, these elements are:

• Three one-story buildings are proposed to support park use: a watercraft concession building near the northern end of the parking lot, a concession/coffee shop, and a comfort station near the southern end of the parking lot. Paved plaza space is associated with these buildings. These structures will feature a mat foundation to not impact the upland cap. The soil below the LLDPE geomembrane at these areas will have been pre-loaded to reduce differential settlement.

• A play area will be constructed just south of the future parking lot with access from the main plaza space and drop off. All required footings will be a mat foundation to not impact the upland cap.

• Additional parking lot for 184 vehicles, including five ADA stalls (four standard and one van-sized stalls). The entirety of this parking area will be constructed to not disturb the upland cap.

• Three picnic shelters on concrete pads will be installed at South Beach.

• Other amenities include seat walls, benches, bike racks, interpretive signs, drinking fountains, and trash receptacle.

• Two fire hydrants.

• Sanitary sewer will consist of a packaged pump station (7 feet in diameter and 6 to 8 feet deep), a 2-inch force main, and 6-inch gravity main with associated manholes and cleanouts connecting to the system installed during Phase 1.

• Additional 8- to 15-inch pipes to convey drainage to the existing City system in Pine Street from the catch basins installed as part of Phase 1 for the future parking area.