

DON'T
SHRED
ON BELLINGHAM



Squalicum Pier - Near the industrial metal shredder site

SAVETHEWATERFRONT.ORG



Take my Picture

Agenda

- Who is Save the Waterfront?
- Information about ABC, the Port, City Zoning and the County
- Information about the Metal Pile - Background & Updates
 - How to help
- Information about the Metal Shredder - Background & Updates
 - How to help

Save The Waterfront



STWF is a local organization of concerned residents from Bellingham and Whatcom.

We believe heavy industry near neighborhoods, that helps few and hurts many, is not the path forward for our community nor the environment.

www.savethewaterfront.org

Core Volunteers



Scott Jones



Rebecca Craven



Luke Vant Hoog



Sarah Gardner



Bill Craven



Alicia Wills



Brian Sarni



Lisa Adam

How to Help

- **Donate to the Legal Fund** - we are working on 501c3 - Please contact us if this is needed to donate
- **Attend City Council Meetings and speak**
- **Write to the right place, at the right time**
- **Stay informed**
- **Inform others**

**Please check the Chat
for informational links.**

We'll talk about the

Metal Shredder

The Marine Dr Metal Shredder would be a dangerous heavy industrial activity. There is no buffer between it, and residents and schools.

then
the

Metal Pile

The **Waterfront** Scrap Metal Storage Pile is a disallowed heavy industrial land use, that has not undergone environmental review.

Alderwood

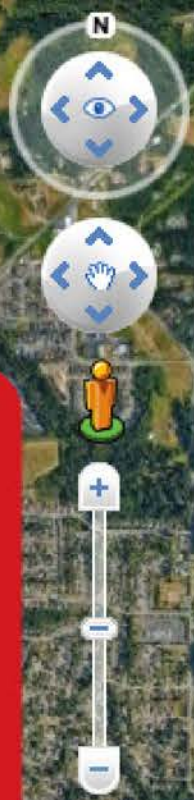
Elementary School

Shredder Location

Birchwood



Bellingham Int'l Airport



- 40-50 trucks a day
Canada to Shredder
- 40-50 trucks a day
Shredder to Waterfront
- 40-50 trucks a day
Waterfront to Shredder
- 40-50 trucks a day
Shredder to Canada
- Unknown trucks a day
Shredder to Eastern WA
Land Fill with possibly
Hazardous Waste

1000'



This is not a problem that impacts one neighborhood.
It is an issue that will affect the entire Bellingham community.

Industrial Metal Shredder
in Alderwood Neighborhood



ABC estimates
37,540 truck trips per year¹
through Bellingham
& Whatcom



Scrap Metal Storage
on the Waterfront



1. Per ABC Dec 5 FAQ: "We project a maximum of four trucks per hour while we are operating (8am-5pm)"
(4 routes x 36 trips per day x 260.7 weekdays/year = 37,540). Half of those being fully loaded.

Metal Shredder

The proposed metal shredder location is on **Marine Drive** just past the Bellingham boundary in the county.

Established neighborhoods and **2 elementary schools** are in the 'red' zone (1/2 mile).

This is different than the Pile



Metal Shredder

Different than the Waterfront, the property is zoned
Heavy Industrial and **owned by ABC** Recycling.

The Shredder is going through permitting.

As a community we must hold agencies accountable to ensure a full SEPA and EIS, as well as air and water quality standards. They are easily bypassed.

Pollution and Fire

Day to day operations release heavy metal air pollution and VOC's and PCB's.

Volatile Organic Compounds - Polychlorinated biphenyls

Fires happen often at Metal Shredders. The toxic pollution when this occurs is extremely high, and there is no buffer from nearby neighborhoods, causing a requirement of 'shelter in place'.

Air, water, noise, enclosure

Metal Shredder

The community is worried about the toxic air and water, along with the noise that is known to come from Metal Shredders. ABC has promised that the Shredder would be enclosed for safety of air and noise pollution.

During their Dec 5th meeting,
they admitted that this will not be the case.

For air cleaning technology and dust mitigation, an enclosed unit must have a negative pressure system, and scrubber technology. As the shredder will not be fully enclosed, this is impossible.

The Shredder must be stopped.

**Sound of
a shredder added**



Metal Shredder

Further, the **electricity capacity** at the property only allows for the shredder, with little left over for cleaning technology.

Known carcinogens such as **Heavy Metals, Volatile Organic Compounds and PCB's** will emit dangerous levels from the Metal Shredder.

Washington state law has not come far enough along, as the state of **California**, to regulate the shredder and keep air safe from residents.

A known danger, most shredders are located far away from neighborhoods.

The Shredder must be stopped.

Metal Shredder

ABC does not know how to shred. They continue to point to their 100 year legacy, which is simply buying and piling metal.

Shredding is new to them.

75% of the metal comes from British Columbia. This will continue as **BC has 5 million people**, while the surrounding **WA counties** have less than **1 million**.

California considers the residue (stuff that is not metal) from shredders to be **hazardous waste**.

The Shredder must be stopped.

Metal Shredder

The Green Story:

Once the metal has been trucked in from all over BC, shredded, trucked to the Port, and shipped half way across the world, **little environmental savings** is left to make the recycling of ABC metal a green story.

Smelters in India and Vietnam often **use coal based or inefficient technology** that reduces the green story further.

The metal will not build our next generation of housing, nor a majority of jobs in the process. **India and Vietnam do not export metal to the USA.**

Metal Shredder

The Economic Story:

As bleak as the Green Story. **15 non-union** local people are to be employed at the Shredder. The light industrial businesses across the street **employ possibly several hundred residents**. A majority, if not all, being **local businesses, investing in our community**.

From Food creation, manufacturing, to Child Care the shredder will make doing business for those in the area difficult, probably causing a **net loss of jobs**.

Metal Shredder

The opportunity to comment on the Permit and the environment will be very short.

If you do not already get our emails, please send it by chat to the host, or sign up at the link just put into the chat.

We'll help keep you up to date.

ABC's application documents maybe found at
www.savethewaterfront.org

Your donations dedicated to your cause.

Our conversations with others who have come before us say 1 thing...

Legal Fund

Bellingham will stay community strong, but without a strong legal fight, companies usually win out.

**Savethewaterfront.org currently has a matching fund. 15k to go!
With some limited edition thank you gifts.**



The Metal Pile



**GP
ASB**

**Metal
Pile**

Shipping Terminal

1647 ft

Google Earth

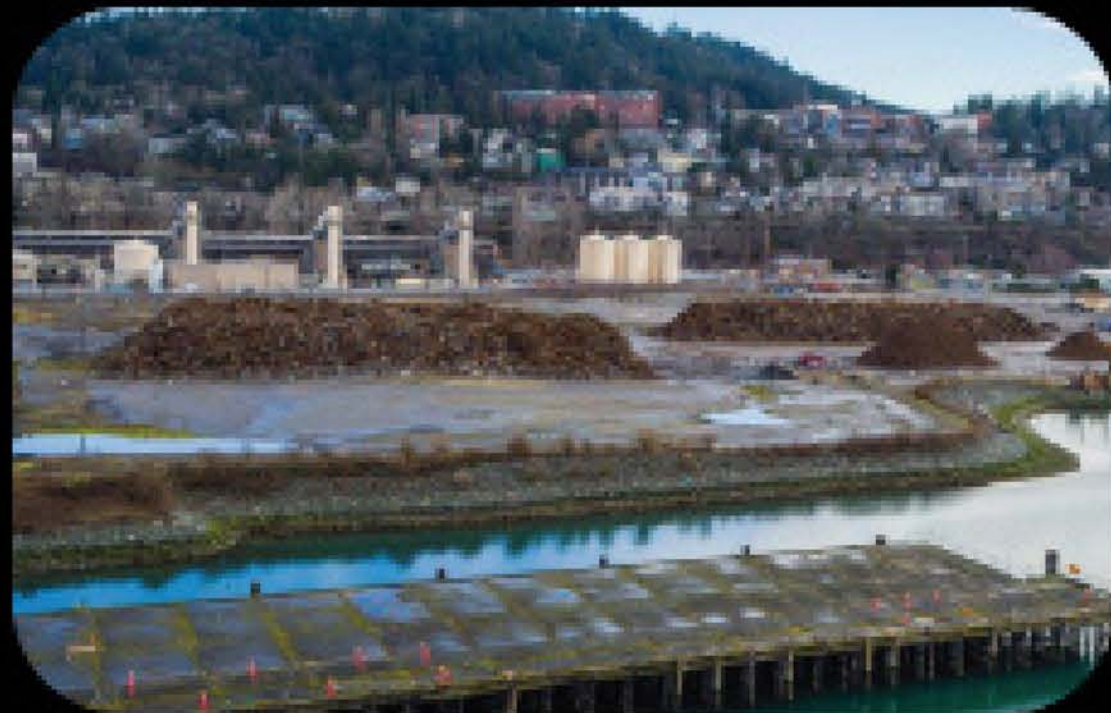


Metal Pile

- In **June 2022**, the Port of Bellingham signed a **15 year lease** (10 year add on), as a consent agenda item. All 3 commissioners voted 'yes'.
- A **SEPA review** for environmental impacts should have been done due to the new lease. It was not. 21 day appeal process **expired** in July 2022.
- Land Use was decided by the City Planning Department as a **Barge Loading Terminal** (BMC 20.37.420 E 10)
 - Reason: To bypass all environmental review and to illegitimately allow the activity in a location that does not allow Recycling Storage without conditions such as enclosure and 7pm work stoppage.

The Waterfront Promise?





OR





View from a Boardmill Building Patio







do some serious investigation into the integrity of the construction of these low-income housing units and then the longevity and stability of it actually being low-income.

“I want accurate results,” she said. “While we are building what I imagine will be beautiful housing for the waterfront, I’m very worried about the integrity of the construction and the positive PR of low-income housing units. I’m very worried about what the condition of those units would be.”

New jobs, too

On top of demand for affordable housing, the community wanted to see new jobs created.

Over the years, a Millworks consultant has advised Ingram there would be more than 150 jobs created by the project, including a campus, operating the facility, retail stores and a possible statewide center to promote and facilitate employee ownership, Ingram said.

BoardMill will create jobs at its boutique hotel, banquet hall, restaurants and marketplace that will promote business ownership, Hegstad said.

“Building these projects takes years and they’re \$20, \$30, \$40 million projects and investments, so that hires a lot of consultants, architects, engineers and construction jobs,” Hogan said.

The waterfront itself creates diverse employment opportunities with marine trades, the **Bellingham Shipping Terminal** and Salish Landing Park, said Brian Gouran, Port director of environmental and planning services.

There will be more office spaces developed over time, and adding residences and low-income units will help employers across Whatcom who have trouble recruiting enough employees because of lacking affordable housing, Fix said. The hotel and conference center will also bring more business.

Subscriber content preview

May 4, 2023

\$120M redevelopment, with hotel, park and 240 units, slated for Bellingham waterfront

By **EMMA HINCHLIFFE**
A/E Editor

On April 11, the Port of Bellingham signed an option agreement with a group of local investors known as the BoardMill Group to purchase and redevelop 5.3 acres of former industrial space in the city's Waterfront District.



Renderings by Haven Design Workshop [\[enlarge\]](#)

This rendering shows the redeveloped Boardmill Building, with additions, to the right, facing across from the proposed seven-story residential building.

• • •

A Modular Metal Shredder

- Goals a

Economic Benefits:

Shredded metal products can be sold to industries that require such metals, creating a new revenue stream. Additionally, it reduces energy consumption and creates new jobs.

- Energy savings using various reclaimed metals compared to virgin ore is up to 92% for aluminum, 90% for copper, and 56% for steel. This results in reduced damage to our planet because mining operations, especially open pit mining, which is extremely bad for the environment.
- Processing metal from automobiles is estimated to save enough energy to power 18 million homes in the United States each year.
- The facility will create 12 to 15 full-time family wage jobs at ribbon cutting with 30 full-time positions at full capacity.
- This facility will increase employment and economic activity at the Bellingham Shipping Terminal where currently ABC Recycling generates over \$700,000 in revenue for the Port of Bellingham annually.

Lease for entire Log Pond area is \$200,000/yr



Along with 6 Full Time Equivalent Longshoreman and a handful of ABC employees moving metal

Waterfront Sub-area Plan

- Pg 19

- Provide community benefits through the phased construction of public open spaces and beaches, pedestrian trails, and moorage for small vessels that fit within the overall intent of the redevelopment plan.
- Identify opportunities to restore and create habitat along the waterfront environment; creating an economically-viable redevelopment.
- Ensure that redevelopment is compatible with environmental remediation efforts.
- Enhance the region's economic vitality by creating conditions that are attractive to a range of employment opportunities and businesses, including water-related industries, research and development ventures, goods and service establishments, and educational and cultural facilities.
- In conjunction with the City of Bellingham, construct an integrated and economically responsible infrastructure network and public amenities that adequately support phased, long-term redevelopment of the site and stimulate private investment in the project. The ability to provide the infrastructure and public amenity system should be derived from grants and the sale or lease of redevelopment parcels by the Port and from grants, bond financing and tax revenues by the City and other applicable fees and service charges. These sources of capital will be used to offset the initial and ongoing investment in infrastructure and amenities to minimize subsidy from the general tax base of the Port or City.
- Increase public access to the waterfront by developing pedestrian, bicycle and vehicular connections to/from the site and an interconnected system of trails, viewpoints, walkways, streets, parking and

Redevelopment of the Waterfront District is a “once in a century” opportunity intended to restore public access along the shoreline and convert the upland area closest to the Central Business District to a vibrant mixed-use extension of downtown Bellingham. Other portions of the site will be remediated and marketed for shipping, marine trades and light industrial uses to replace a portion of the jobs lost when the Georgia Pacific mill closed. The City and Port have invested considerable public funding over the past five years to complete environmental cleanup projects, restore a portion of the shoreline, and install arterial roads, parks and utilities to prepare the Downtown Waterfront area for redevelopment.

1.5 Redevelopment Potential

The redevelopment of the Waterfront District as an urban neighborhood will help concentrate a significant amount of expected population growth within the existing city limits and reduce impacts on agricultural, forest and rural landscapes in the county. The 2016 Bellingham Comprehensive Plan projects a demand for 6,459 new infill housing units and 3,930 new jobs within Urban Villages by the year 2036. The Waterfront District encompasses a significant portion of the vacant land within City Urban Villages. Redevelopment at urban density is an important element in the City’s adopted infill strategy.



ABC is untrustworthy

From Bellingham's experience with ABC Recycling at the Waterfront Metal Pile, we have found ABC Recycling to be a company that circumvents laws and regulations for the benefit of their profits and bottom line.

What happened exactly?

Land Use - A Trick

Instead of lawfully applying an appropriate Land Use,
such as a Recycling Collection Facility,
and accepting those safety restrictions for the environment and
residents,
deciding parties chose an illegitimate Land Use.

Barge Loading Terminal?

This was used to bypass land use and environmental review, by comparing the scrap metal to boulder shipping

20.37.420 E 10 - Barge Loading Terminal

- ✗ Loaded onto a barge
- ✗ Is benign as a boulder
- ✗ Short term project
- ✗ Is not an air pollutant
- ✗ Is not a water pollutant
- ✗ Is not a community disturbance

20.37.420 F12 - Recycling Collection and Processing Center

- ✓ Collection and processing of metals
- ✓ Conditional in the commercial neighborhood, waterfront designations.
- ✓ Recyclable material does not include yard debris or other organic decomposable material, hazardous material, or refuse

YES!

The operation must be carried on entirely within an enclosed structure.

YES!

If the site plan boundary is within 500 feet of a residential zone, hours of operation shall not be longer than 6:30 a.m. to 7:00 p.m.,

The Metal Storage is Heavy Industrial

20.36.020 - The light industrial (LI) designation is intended to accommodate uses which are not compatible with uses allowed in the central commercial areas but which **do not create noise, smoke, odors or other objectionable nuisances [Heavy Industrial]** to the extent that they may be detrimental to each other or to surrounding areas.

The Metal Storage is Heavy Industrial

Heavy, Use Qualifier. The heavy industrial (HI) designation is intended to accommodate uses which may create a higher degree of hazard or annoyance than those permitted in any other land use classification.

FEIS (2-10) - During early development phases, it is expected that the Log Pond Area would continue to be used for light industrial activities].... [As redevelopment occurs in those areas, the Log Pond Area would eventually be considered for a transition from light industrial to mixed use



**WATER
FRONT
ACROSS
THE
STREET**



State Environmental Protection Act

SEPA

- SEPA should have been triggered due to the lease signing in 2022
- City Permits for a mobile office and truck scale were too small
- Department of Ecology is now deciding on whether a SEPA is needed for a Stormwater permit.
 - This may be our last chance for a SEPA review to save our local environment and resident's health at the Waterfront.
 - Send the letter today! www.savethewaterfront.org
 - .

State Environmental Protection Act

SEPA - Broad Review

- ABC is fighting against all SEPA review because...
- Any SEPA review will require the review of all factors and mitigation of
 - Air, water, noise and community hazards
 - Traffic into and out of the area
 - Possibly even the effects of the Metal Shredder due to toxic residue.

They will actually have to follow the law.

Water

Due to the significant industrial change of ABC's activity at the Log Pond the metal storage activity has been required to have its own Stormwater permit with Dept of Ecology.

The Permit was required to be in place before the activity began.

ABC has been illegally operating at the Log Pond since June 2022.

Water

ABC says the ferrous metal is 'clean'.

Water released into the Bay from the Shipping Terminal has had benchmark exceedance violations of lead, zinc and copper.

ABC has admitted that it was their operations that caused the violations.

Takeaways: 1) The metal is not clean. 2) The shredder metal will be worse.

10/4/23, 3:11 PM

Violation Details

Close Window

Facility Name: Bellingham Shipping Terminal POB

Permit: WAR305536

Category: Benchmark Exceedance

Type: Benchmark Exceedance

Date: 4/1/2023

-
Notes:

Monitoring Data

Parameter : Lead

Fraction: Total

Units: Micrograms/L (ug/L)

Statistical Base: Average

Sample Type: Grab

Non Report Reason: -

BenchMark Min: - Max:64.6

Limit Min: - Max:-

Design: -

Design Warning: -

Value: 103

Violation Override: -

Related Enforcements

More LAW bypassing

ABC is attempting to bypass another opportunity for protect our community.

Per ABC's permit application for their Stormwater permit, they are attempting to be exempt from SEPA, because of their past illegal activity at the Log Pond.

Who is the SEPA lead agency on your site? Port of Bellingham

Has the SEPA lead agency issued a final decision on your checklist? Yes No Exempt

If No: The NOI is incomplete. Ecology will hold the application until a final SEPA decision is made or the Construction Stormwater NOI public comment period ends, whichever is later. **You must notify Ecology once the lead agency has issued a determination.**

If Yes: Type of SEPA decision issued:

Date of final SEPA decision:

Date when all SEPA-related comment & appeal periods ended or will end:

If Exempt:

- Watershed Restoration & Fish Habitat Enhancement Exemption (RCW 43.21C.0382).
- Infill Development Exemption (RCW 43.21C.229).
- Planned Action Exemption (RCW 43.21C.031).
- Categorical Exemption. Under what section of the SEPA Rule (WAC 197-11-800) is it exempt?
Section: RCW 43.21C.0383(1)

Air Testing



Back to that video



Noise

- The disturbing crashing noise continues until 3am for up to 10 days.
- The Waterfront Sub-area Plan does not allow for this noise.
- The Bellingham Noise Disturbance Policy does not allow for this noise after 10pm.
- The Port's Environmental Impact Statement never reviewed an activity that would cause such noise.

Noise Disturbance Policy

10.24.120 (C)(4). Construction and **industrial noises**, including, but not limited to, motorized construction and equipment operation, hammering, blasting, drilling and sawing audible in residentially zoned areas, regardless of the location of the zone from which the noise emanates, between the hours of 10:00 p.m. and 7:00 a.m., that unreasonably disturb or interfere with the peace, comfort and repose of others.

Note: The policy never allowed industrial noise to disturb residents. The City historically read the policy wrong, with no enforcement. This simply clarifies that which the city always intended.

Noise Disturbance Policy

Fear: Opponents have argued that the new policy would scare industry.

Answer: As the heavy industry is not planned for as the Waterfront moves away from industry, is it a worry to scare away heavy industry that is not permitted?

Fear: Unintended consequences may effect other businesses. The policy is subjective. Police officers will have to make subjective decisions.

Answer: 1) Thousands of residents not sleeping a week at a time, are worth some growing pains. 2) Police officers make subjective decisions often. The community can trust them to make an appropriate decision for the extreme of a multi-night crashing metal ship vs a momentary beeping truck.

Metal Pile

The economic story:

- 1) The metal pile brings in \$200,000 per their lease.
- 2) 6 Full Time Equivalent Longshoreman jobs
- 3) Up to 10 ABC employees including the Communications Director (?)

Catastrophic Economic Loss:

- 1) Condominium / Property value loss
- 2) Light industrial and mixed use job loss (hundreds?)
- 3) Economic value of lost sleep by workers
- 4) Tourism
- 5) Environmental clean up

Pile Timeline

The Port and ABC signed a 25 year lease as a consent agenda item.

June 2022

Dept of Ecology began to press for safer stormwater measures, recognizing the dangers

January 2023

Full stoppage of the project, as an unacceptable activity at the Waterfront

Future

The first ship was loaded. Alerting the community that something was new at the Port

October 2022

ABC attempts to bypass environmental review again, during their Stormwater Permit application

December 2023

Pile - Upcoming

Write

By Dec 22nd, write Ecology to request a full environmental review.

Speak

The next City Council meeting is Jan 8th. Speak in support of the Noise Disturbance Policy.

Donate

Appeals and further legal action will take considerable funds.

Inform

Stay informed and help others know about the dangers of ABC

www.savethewaterfront.org

Shredder - Timeline

ABC quietly purchases property for \$3.6 million

April 2021

County Council Moratorium fails 3-3-1
Kaylee Galloway abstains

Nov 2023

500 people show up to a 150 person capacity meeting to hear from ABC.

Dec 5th

Public comment window will be very short. Please stay in touch with us for updates.

Spring 2023

1000 Signatures
for a petition to create a moratorium on Heavy Industrial land near city's.

ABC Files
Incomplete application for a Metal Shredder with the County Planning Dept

Spring 2023
Permit may go before the Hearing Examiner. Legal account will need to be fully funded

Future

This will depend on how much the community becomes involved

What can you do?

Donate

The community must have the funds to have legal representation at the hearing examiner come Spring.

Talk

To your neighbors.
Keep this issue top of mind.

Donate

This is an investment in your community and your own lives.

Write

Head over to www.savethewaterfront.org to see when and where

Questions:

Q: How do we get the media involved?

A: Please write to your favorite or most powerful media outlet.

Q: Can we support a Working Waterfront and be against ABC's polluting activities?

A: Being against ABC, is supporting true Working Waterfront industries, and future developing jobs.

Q: Since ABC's Shredder Proposal was recently rejected, is there a way to submit another moratorium?

A: The application is still on going. It was not rejected. A new moratorium would have to be through a motion by a council member who voted no or originally abstained.

Questions:

Q: Please speak on the Residue. Where does it go? How does hazardous waste become valuable? How much of the car or appliance is residue?

A: Probably to Oregon by rail. It becomes valuable by being used by inorganic cover for landfills. About 1/3 of a car or appliance is residue.

Q: What about the wetlands at the Metal Shredder. Will animals and plants be able to live there? Will the water be polluted?

A: This is unknown, and will be researched.

Q: Given the previous tenants of the Shredder site, is it possible that the area is contaminated and will require remediation before any construction/disturbance of the soil can proceed?

A: Yes. The required SEPA and EIS will require this. We must write!

Thank You!

Fighting a polluting company is never fun.

We should be spending time developing Bellingham and Whatcom into the areas we were promised through planning.

The fight is worth it.

DON'T
SHRED
ON BELLINGHAM



SAVETHEWATERFRONT.ORG



Take my Picture

**Get a sign today!
Now back in stock.**