



**DEPARTMENT OF
NATURAL
RESOURCES**

**Aquatic Resources
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March 13, 2020

Ms Connie Groven
Department of Ecology
Southwest Regional Office
300 Desmond Dr SE
Lacey, 98503-1274

Subject: Western Port Angeles Harbor RI/FS

Dear Ms. Groven:

The Washington State Department of Natural Resources (DNR) would like to thank you for the opportunity to comment on the Remedial Investigation/Feasibility Study for the Western Port Angeles Harbor site.

DNR's comments are based on principles of stewardship and proprietary management derived from our statutorily defined goals to protect State-Owned Aquatic Lands (SOAL) and manage them for the public's benefit. We appreciate Ecology's consideration of these and any future comments related to the investigation and cleanup of the site.

-The document as a whole relies on large amounts of information that is presented primarily in appendices; adding additional summary information in the main text to reduce the amount of cross referencing required would make the document more accessible.

-Engineered caps are a major component of the selected remedy for SMA 1, primarily on State-Owned Aquatic Lands. Because engineered caps typically require institutional controls that may encumber future uses of SOAL, including restrictions on anchoring, they require authorization from DNR. This authorization will be necessary for not only the cap itself but for ongoing maintenance and monitoring for the lifetime of the cap.

-Additionally, much of the area where capping is to be performed is used for industrial and port activity. The proposed method of management of the risk of damage to the cap from scour, anchoring, and other activities, including eventual replacement of improvements at the end of life, is not clear. Additionally,



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given the depositional nature of the inner harbor, will it be possible to maintain navigational depths over time if potential dredging is restricted by the presence of a cap?

-No action areas defined by a 50 foot offset from overwater structures also coincide with much of the areas of potential scour in SMA 1. Contaminated sediments in these areas could be mobilized and contribute to recontamination of the capped area. While DNR understands the practical infeasibility of dredging and engineered capping in these areas, some alternatives, such as ENR with or without amendment by activated carbon, should have been considered.

-While much of the harbor passed bioassays for toxicity, there were bioassay failures in the SMA1 and SMA2 areas. These are the areas of some of the heaviest wood waste accumulation as well as the highest porewater sulfides, suggesting that in these areas anaerobic decay of wood waste is still ongoing. If a cap is constructed, monitoring for the upwelling of sulfides from anaerobic decay of wood waste should be conducted in those areas.

-Limitations on sediment disturbing work in the cap area will also inhibit creosote piling removal efforts; creosote pilings are specifically cited as a source control issue. DNR is concerned about recontamination from these pilings and the appropriateness of a cap that would restrict that source control work.

-Due to the small size of the removal portion of the preferred remedy, the vast majority of contamination on SOAL will remain in the environment. It is not clear that the amount of removal of contaminated sediments would truly meet the public desire to reduce risks from ongoing contamination by removing contamination from the harbor, particularly with respect to the potential for damage to the cap during normal activity in the harbor.

-Since source control will be administered through other Ecology programs, it would be helpful to have an overview of how coordination between source control and cleanup will be conducted for this site.

-The remedy selection rationale for SMA 2 included the limits on access to the area because of its location on private property; however, it is connected to the harbor via the channel, which is also a no action area. Additionally, there is not sediment data from the channel, so its sediment quality is unknown. How will the potential for this to be a source to areas that do have public access in the harbor be limited?



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-The channel between the harbor and lagoon, terminal berthing areas, and sections of erodible shoreline are all cited as potential sources of contamination, but are all considered to be part of no action areas. These sources do not appear to be sufficiently addressed in a source control evaluation. Additionally, much of these areas are considered to be areas of direct contact exposure and/or sessile seafood exposure, presenting a risk to the public who may access the areas for recreation or fishing activities, either at present or in the future.

Sincerely,

Erika Shaffer
Sediment Quality Unit