



**DEPARTMENT OF  
NATURAL RESOURCES**

**Aquatic Resources Division**

PO Box 47027  
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November 21, 2022

Lucy McNervy, Site Manager  
WA Department of Ecology  
PO Box 330316  
Shoreline, WA 98133-9716

**Subject:** Gas Works Park Site Remedial Investigation and Feasibility Study

Dear Ms. McNervy:

The Washington State Department of Natural Resources (DNR) appreciates the opportunity to comment on the draft Remedial Investigation and Feasibility Report (RI/FS) and Agreed Order for the cleanup of the in-water Sediment Unit of the Gas Works Park Site (GWPS) in Seattle.

DNR bases these comments on principles of stewardship and proprietary management derived from legislative defined goals to protect State-Owned Aquatic Lands (SOAL) and preserve them for the public's benefit. We appreciate both the project proponent and Ecology's willingness to work together with DNR during the development of this RI/FS to ensure statements related to ownership are correct and that this document properly characterizes the State's interests as they relate to the management of SOAL. We further appreciate Ecology's consideration of these and any future comments related to remediation on this site.

DNR would like to express its support of these efforts and acknowledge the significant progress made towards cleanup on this site. The in-depth characterization of sediment conditions and transport models provide confidence to support the various remedies proposed for different sediment management areas within the GWPS site.

DNR recognizes that the GWPS is a sediment cleanup unit (SCU) within the larger region of compromised sediments of Lake Union. We further understand that additional remedial work will need to occur at other sites throughout Lake Union to bring sediments as a whole up to MTCA/SMS standards. This cleanup is a large step towards that goal.

DNR appreciates the confirmation you provided in your September 16, 2022 correspondence noting that this cleanup will not preclude options for further cleanup of remaining contaminated sediments such as the orphaned contaminants that remain within the Northlake Shipyard management area (NLSY). DNR anticipates the NLSY area will receive additional assessment as a separate MTCA-led effort given the large investment proposed in this RI/FS for the adjacent GWPS.

DNR supports the remedy selected and looks forward to reviewing details provided in the Cleanup Action Plan and Engineering Designs that follow. DNR will help facilitate access for cleanup actions.



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Sincerely,

Shayne Cothern  
Site Manager  
DNR Aquatic Resources Division  
Washington State Department of Natural Resources