

Gary Kline

Thank you for this opportunity to comment on the Remedial Investigation Work Plan for the Sundberg Gravel Pit.

The Clean Black Alliance is a citizens group that formed to advocate for ecosystem based solutions in Black Lake and other lakes in Thurston County. We believe that the current routine use of herbicides and alum are short-sighted methods to remove what boaters referred to as nuisance plants and to prevent harmful algae blooms. We promote other methods such as aeration or adequate nuisance plant removal to appease boaters and remove phosphorus.

In reading the proposed RI Work Plan proposed for the Sundberg mine, we see parallels with our advocacy for lakes. We believe that the Sundberg mine has been used to unlawfully deposit wood waste, bark and construction debris and that poses a risk to the environment and public health.

One of our members is Laurie Gneiding, a retired environmental toxicologist who has submitted comments of her own on your webpage. We second her recommendations which are based on her 40 years of experience in hazardous waste investigations. As a group devoted to water quality, her suggestions for groundwater testing are especially critical.

The Sundberg site, more than a gravel pit and log yard, was an illegal hazardous and solid waste dumpsite for many decades. It was used by various entities, including the City of Olympia and the Port of Olympia, to dispose of construction and other waste. Because some of the waste dumped at the site came from the Port of Olympia and a large portion of the property was used by Weyerhaeuser as an export log yard where logs were debarked, we suggest that Ecology include chemical analyses of pentachlorophenol and other chemicals associated with wood treatment, as well as those chemicals commonly used in silviculture practices at the time the export log yard was operating.

We believe the dump site operated without oversight or regulation just minutes away from the Port of Olympia during the cleanup of the West Bay industrial area and the Cascade Pole site.

We request that Ecology include the history of the site which includes documentation from DNR and the City of Olympia, eyewitnesses and photographic evidence.

We have video footage that demonstrates that runoff from this site flows to Puget Sound. We believe it is possible that contaminants from this site reach federally protected waters for endangered species at concentrations that could potentially affect them. We suggest that Ecology analyze stormwater from the site prior to entry to the nearby Green Cove Creek and Butler Creek, which we believe are habitat for threatened species, and coordinate with federal agencies who have authority over these matters.

Thank you for your consideration and your good work.