



May 7, 2015

Marian Abbett, Toxics Cleanup Program
Washington State Department of Ecology
P.O. Box 47775
Olympia, WA 98504-7775

Subject: Rayonier Sediment

Dear Ms. Abbett:

The Washington State Department of Natural Resources (DNR) would like to thank you for the opportunity to comment on the Interim Action Report Volume III for the Rayonier, Inc. site in Port Angeles.

DNR's comments are based on principles of stewardship and proprietary management derived from our legislative defined goals to protect State-Owned Aquatic Lands (SOAL) and preserve 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.

First, regarding the future use scenarios, DNR supports restoration as part of its role as a steward of State-Owned Aquatic Lands. Removal of the dock and jetty structures will help to restore this portion of the bay to a more natural state and allow a wider range of remedial alternatives for contaminated sediments near these structures. DNR supports removal of the dock and jetty as described in future use scenario 1. This removal would ideally be performed in coordination with sediment remediation activities to reduce the potential impact of any disturbed contaminated sediments. Removal of the dock and jetty will also reduce constraints on the implementation any future remediation work.

Secondly, regarding Appendix B's analysis of sediment remediation technologies, DNR is concerned that any potential design for fill/capping balance the need for an effective remediation of contamination, potential future uses that may be constrained by capping, and appropriateness of any armoring material for the potential restoration of the site to a functioning habitat for aquatic organisms.

Finally, regarding Appendix C's analysis of remedial alternatives, DNR is supportive of alternatives that incorporate permanent, effective remediation technologies. Where feasible, DNR supports removal of contaminated sediments, especially in the log pond and in the most contaminated areas of the dock footprint. DNR supports enhanced natural recovery where sediment contaminant concentrations are lower if designed appropriately for future uses and

Ms. Marian Abbett
May 7, 2015
Page 2 of 2

sediment transport. In the case of both the fill/cap areas and enhanced natural recovery areas, DNR requests that the potential for sediment erosion or vessel scour be considered in the final remedial design. Because institutional controls will likely be required to ensure long term performance and efficacy of these remedial alternatives, DNR acknowledges that coordination will be required from the agency in its role as land manager. These institutional controls will likely place restrictions on the ways the resources of State-Owned Aquatic Land may be utilized by the people of Washington State, including potential limitation to shellfish harvesting, short term anchoring, restoration of habitat, and general public access. These restrictions should be weighed in the evaluation of the costs and benefits of these remediation technologies.

Sincerely,

A handwritten signature in black ink, appearing to read 'Erika A. Shaffer', with a long horizontal flourish extending to the right.

Erika A Shaffer, MS
Aquatics Division, Sediment Specialist