Randy Volker

The Community Boating Program, a Washington State Non-Profit Corporation and Federally recognized public charity (501c3) is providing these comments about Project Macoma.

The Community Boating Program's purpose is to provide access to boating opportunities to youth and adults on the Olympic Peninsula. We do this primarily through our youth and adult boating instruction programs. Our organization routinely utilizes the waters at the west end of Port Angeles Harbor, where we conduct our youth sailing programs and other on-the-water activities. Our programs operate from March through October with over 300 participants in 2024. In addition to on-the-water activities, we have a boat storage yard on land located adjacent to Terminal 7 that is leased from the Port of Port Angeles. It has come to our attention that Project Macoma is seeking approval to discharge highly alkaline effluent into Port Angeles Harbor near Terminal 7. Given our routine use of these waters, we have vested interest in the developments regarding the placement of infrastructure both onshore, at Terminal 7, and the effluent outfall in the harbor.

We understand that the effluent to be discharged through the Project Macoma outfall will have varying high pH levels and contain numerous chemicals. These high pH levels and chemicals could impact the safety of our youth sailors and instructors as well as the operation of our equipment. Our on-the-water dinghy sailing programs regularly operate in the waters around Terminal 7 less than 300 feet from the proposed effluent outfall location. Our youth sailors routinely come into water contact by spray during sailing or total immersion during dinghy capsize drills which is part of dinghy sailing safety training program. Our organized kayak outings transit between Terminal 7 and the shore which is less than 100 feet from the proposed outfall location and continue around the western shore of the harbor. The Port of Port Angeles Boat Launch Ramp is located adjacent to Terminal 7, approximately 400 feet from the proposed outfall location. This boat launch is probably the most active in Clallam County with 1000's of boaters per week utilizing these facilities during the spring and summer months. Given the recreational use of these waters so near to the Project Macoma proposed outfall, we are concerned that this recreational use by the public will be impacted.

The tidal currents in Port Angeles Harbor are not easily predicted because it is an enclosed body of water open to the Strait of Juan de Fuca at the eastern end and has significant variations in water depth and bottom contours. This results in countercurrents and eddies during tidal cycles and uneven and inconsistent tidal currents throughout the harbor. Additionally, mixed semi-diurnal tides with seasonal variations add to the complexity of predicting tidal currents in the harbor. The proposed outfall location is at the head of the harbor in an area that does not experience significant tidal action. Material that is seen floating in the harbor may be resident in harbor for many days, especially at the head of the harbor where the proposed outfall will be located. The discharge plan for Project Macoma simply states that the discharge of high pH effluent will occur at ebb tides. Given all the tidal variations and dynamics of the tidal activity in the harbor, there is a concern of effluent buildup in tidally challenged areas. More consideration should be given to discharge times to assure adequate mixing and dispersal of the effluent outfall. Additionally, water monitoring should be done in areas used for recreation not just at the boundaries of the mixing zone. If this monitoring indicates water conditions are above acceptable levels, the public should be warned in real-time.

Since the Project Macoma infrastructure and associated effluent discharge could impact the existing recreational use of the Port Angeles Harbor waters near the project and present unknown safety, logistical, operational, and financial impacts to our youth programs, we request that these concerns be addressed before approval of this permit.