

**Joanne Snarski's Comments for Preliminary Draft
Management Plan for the Remedial Investigation-Feasibility Study of the
Uplands Environment
Volume I, Work Plan
February 2003**

General Comments

1. Within the Introduction Section, it would be helpful to reviewers to include a short discussion/acknowledgment of the relationship of the uplands investigation to the marine investigation. Of particular interest would be how the characterization of upland cleanup levels/risks may affect the marine environment cleanup.
2. All figures that include state owned aquatic lands (SOAL) should include ownership lines and information (e.g. Figure 1-1). Such lines would include: inner and outer harbor lines, lease and easement boundaries and tideland ownership parcels.
3. The groundwater cleanup levels are not clearly stated in the document. A brief discussion with Department of Ecology found that ground water discharged to surface waters would be required to meet surface water standards. Please include a brief discussion of this in the appropriate section.
4. Due to the short initial comment period, a full review of Volumes 2 and 3 (attached to subject document) could not be completed. Review of these volumes will be performed during the public comment period.

Specific Comments

1. Page 2-19, Section 2.2.6.3.1: In addition to the Shea 1981 reference, please include, as appropriate, the **Washington State Shore Zone Inventory**. This information can be found on DNR's webpage at <http://www.wa.gov/dnr>.
2. Page 3-38, second bullet, "*Wood and Bark Debris*": In addition to the toxicity of chemicals released from this source, please add a short discussion of the potential for increased sediment biological oxygen demand (BOD) that can lead to hypoxic conditions in the sediment.
3. Page 5-9, Section 5.4.1.2, initial paragraph continued for previous page: This paragraph states that soils will be screened against industrial cleanup standards due to historical uses. DNR requests that soils on SOAL (i.e. filled harbor area) be screened using Modified Method B screening levels. If Method B is not used then land use restrictions will be imposed as described in WAC 173-340-440. It is not in the public interest for the State to endure long-term land use restrictions

associated with contaminants on public lands. Remedies that require institutional controls on SOAL would be considered an encumbrance and consequently would require a use authorization for that encumbrance. As a harbor area, this land must be promoted for full development of water-dependent/oriented commerce and/or public access.

4. Page 5-13, Section 5.4.2.1, initial paragraph continued for previous page: Based on an ecological risk analysis, this paragraph develops a rationale for establishing a cleanup level for soil at the site. DNR disagrees with the “industrial/commercial” level of cleanup designated for SOAL uplands (i.e. the filled harbor area). DNR requests that these uplands be evaluated for an “unrestricted” land use, therefore including plants and soil invertebrates in the analysis. The rationale is the same as the previous comment.