



Ken Koch
Water Quality Program
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

RE: Port of Everett's Comments on the Proposed 2010 Water Quality Assessment and 303d List for Washington State

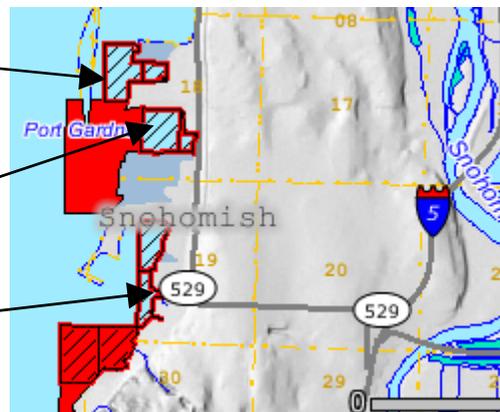
Dear Ken,

The Port of Everett (Port) has reviewed information related to Ecology's 2010 Water Quality Assessment and resulting proposed 303 (d) listings for water and sediment quality in the Port Gardner Area. The Port appreciates the opportunity to review this information during the public comment period and seeks further discussion with the Ecology to ensure the listing accurately reflects all current and available data. We are specifically reviewing information for areas that are either owned or operated by the Port. These areas include the following:

➤ 12th Street Yacht Basin
(IDs 608191, 621072)

➤ Port of Everett North Marina
(IDs 614094, 619429)

➤ Port Terminals
(ID 504391)



We have some concerns regarding the basis of the draft listings. It appears that in each case the listing is based on a sediment sample exhibiting a bioassay failure. The bioassay samples are relatively old, ranging in date from 1986 to 1992. The Port has knowledge of or has obtained more recent data that are more representative of the current conditions in the proposed listing areas. We would like the opportunity to provide this information to

Ecology for your consideration. We believe it is important information and in some cases may result in revision to, or elimination of, the proposed listing. Please note that Landau Associates, an environmental consultant to the Port, will be providing more detailed comments on proposed listings 608191 and 621072 on behalf of the Port of Everett.

Also, the Port has several sets of sediment chemistry data from portions of the listing 504391 area which encompasses the Port's marine terminal area that appear to be more recent than the data cited. Several consultants to the Port have collected data which have been supplied to Ecology, in some cases through the DMMO, over the years from 1990 to the present.

Finally, the Port has conducted 2 years of seasonal water quality monitoring in the Everett Marina, the 12th Street Yacht Basin, and the lower Snohomish channel that may also be of interest to Ecology and can be supplied upon request.

We appreciate the opportunity to provide comments to the 2010 Water Quality Assessment and look forward to discussing our areas of interest with you in the near future.

Please contact us at (425) 388-0604 or by email at erikg@portofeverett.com

Best Regards,



Erik Gerking
Environmental Cleanup Administrator
Port of Everett