



Memo

Date: Thursday, December 28, 2017
To: Dwight Leisle, Environmental Program Manager Port of Portland
From: Katy Weil, Senior Management Analyst Conservation Program
Subject: Comments on the Combined Feasibility Study and Source Control Evaluation
Willamette Cove Upland Facility ECSI# 2066

The draft Combined Feasibility Study and Source Control Evaluation (FS and SCE) outlines remedial options to address contaminants present in the upland portion of the Willamette Cove site, including portions of the riverbank above mean high water (MHW).

Metro's Conservation Program has reviewed the draft developed by Apex Companies, LLC. The technical elements of the proposed alternatives and details regarding each proposed alternative, background analysis, figures and tables, have been researched and completed by Apex. We understand that this version of the FS - SCE will be finalized through a cooperative process among DEQ, the Port and Metro.

This memo serves to provide comments on the document specifically concerning site owner perspective regarding remedy implementation and long-term site management. In addition, the proposed future regional trail alignment for the npGreenway trail is included in this memo for reference. Please note that this alignment represents the result of the 2010 Draft Alignment Feasibility Study and the spur trails added by the City of Portland have been removed from consideration at this time. Metro's commitment to the trail remains and recognizes that the final trail alignment may be modified as part of the final remedy for the site.

Section 2.4: BACKGROUND Future Site Use The draft FS – SCE notes “as the property owner, Metro recognizes that the presence of hazardous substances may limit the use of the property, and therefore, only uses that are consistent with site cleanup goals will be implemented. Metro will agree to place restrictions on the property deeds that limit site uses to passive recreation activities (including but not limited to trails, benches, viewing areas, and in-water mitigation sites), and do not allow active uses such as designated child play areas, sports fields, or picnic areas. In addition to the deed restrictions, access to the Site will be limited to designated areas designed for pedestrian or bicycle use. These areas will be planned after the remedial action for the Facility has been completed.” Metro agrees with this section, but would change the use of “may limit” to “does limit.”

Section 5.3: SITE MODEL The draft FS – SCE notes that the property is targeted for green space, ecological restoration, and park uses consistent with green spaces. Metro understands that active recreational uses may not be suitable for the Facility and that deed restrictions would be required to limit site use. We agree with the draft notation here and understand that there will be a need to place restrictions on the property that limit site uses to passive recreation activities. Restrictions to access could be developed with a combination of signs, paved trails, and physical barriers such as railings and fencing (as is also noted in section 2.4 of the document). The size and scope of these elements lead Metro to support two of the proposed alternatives primarily due to the potential to effectively support these needed actions.

Section 9.5: DETAILED ANALYSIS OF REMEDIAL ACTION ALTERNATIVES Alternative 5 – Excavation and On-Site/Off-Site Disposal and Alternative 7 - Focused Excavation and Off-Site Disposal with Alternative Cap and Access Restriction

Upon review of the proposed alternatives, Alternatives 5 and 7 would be the remedial action remedies most efficacious to Metro as site owner. To address questions raised by both DEQ and the Port, our perspective is as follows:

- Alternative 7 is favorable given the installation of an appropriate amended cap. This amended cap could be installed in a manner that would allow installation of native ground cover and shrubs. We assume inspection and maintenance of the cap would be required over the course of Metro's ownership.
- Alternative 5 is favorable with the assumption there will be the required space in the upland for consolidation of contaminated soil. For in-water remedy planning, each alternative appears to assume a design involving a layback of the riverbank in specific areas. That may appear to take some of the land planned for soil consolidation space which would require examination of available area throughout the site. There is the potential of the one acre lot at the base of N Richmond that is already under cap in the form of pavement, as well as the acreage to the east of that unit. This could be utilized if necessary, depending upon feasibility. There are other areas on site that could be acceptable for contaminated soil consolidation. The goals in that case, however, would be for as small and localized an area as possible to facilitate appropriate oversight. We assume inspection and maintenance of the cap would be also required over the course of Metro's ownership. Our management and stewardship of the site supports the existence of native tree species such as Oregon white oak and Pacific madrone, and prefer to preserve existing trees as consistent with the 2015 removal action.
- Metro supports these alternatives as the preferred final remedy for the site over the other alternatives that were evaluated. Alternatives 5 and 7 are best protective of human health and the environment through a combination of removal of higher relative concentration material and prevention of direct contact using caps, institutional controls, and engineering controls. Both of these remedies, of course, require site management in perpetuity. Site history shows a consistent challenge regarding public safety. A final upland remedy should provide confirmation regarding where human and ecological risk management will be required. The level of future site management should be planned to provide protection for both the trespasser and the park user levels.
- Metro, as property owner, would develop deed restrictions and other institutional controls to meet the requirements of remedy protection. While institutional controls may seem challenging in the case of Willamette Cove, we expect there will be innovative approaches to support these controls.

As requested, drawings of the draft npGreenway regional trail alignment that would traverse the property are included, below.



Willamette Cove Trail West -- Alignment
 Data provided by Portland Parks & Recreation and Environmental Services
 July 31, 2009
DRAFT 0 100 200 300 400 Feet NORTH



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cc: Dan Moeller, Conservation Program Director Metro
 Hope Whitney, Senior Assistant Attorney Metro

