



November 3, 2015

Lisa Wood
Washington Department of Fish and Wildlife
600 Capitol Way North
Olympia, WA 98501-1091

Re: DNS 15-056: HARPER ESTUARY RESTORATION - PHASE 1 - Kitsap County

Dear Ms. Wood,

Thank you for the opportunity to comment. The Washington Department of Natural Resources has the following comments on the SEPA environmental review:

The application does not correctly identify the state aquatic ownership, therefore we ask that WDFW provide a survey that does so. A land use agreement will also be needed, because part of the project will take place on DNR managed State owned aquatic lands.

Page 2 of the Site Plan (Permit Drawings, sheet 6 of 12) identifies two groups of wood pilings that are to be removed. DNR recommends the attached *Best Management Practices for Pile Removal & Disposal* are followed during removal activities. Because cutting a pile generates increased surface area from which creosote can leach, we also recommend the entire pile is removed whenever possible and cutting a pile should occur as a last resort. In the case of short pile stubs that are at/near mudline, leaving a stub is preferable to creating a new cut and exposing fresh creosote while only removing a few linear feet of pile.

Please see attached Habitat Stewardship Memorandum for additional concerns.

If you have any questions, please contact me at (360) 902-1739.

Sincerely,

A handwritten signature in blue ink, appearing to read "Elizabeth L O'Neal".

Elizabeth L O'Neal
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