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August 16, 2017

Lisa Wood, SEPA/NEPA Coordinator WA Department of Fish and Wildlife Regulatory Services Section 600 Capitol Way North Olympia, WA 98501-1091

Dear Ms. Wood:

Thank you for the opportunity to comment on the determination of nonsignificance for the Madrona Links Golf Course Grass Carp Project (DNS 17-041) located at 3604 22<sup>nd</sup> Avenue Northwest in Gig Harbor as proposed by Matt Stutsman. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

## TOXICS CLEANUP: Mary Coleman (360) 407-6259

This proposed project is located in an area that may have been contaminated with heavy metals due to the air emissions originating from the old Asarco smelter in north Tacoma (visit Ecology's Tacoma Smelter Plume map search tool:

https://fortress.wa.gov/ecy/smeltersearch/). Soil contamination from the old Asarco poses risks to human health and the environment. Ecology recommends soil sampling in areas of the project that involve soil movement, in this case dock replacement, bulkhead repair, etc. Sample the upper 6 inches of soil in the area of soil movement and analyze it for arsenic and lead. If arsenic or lead are found above the Model Toxic Control Act (MTCA) Method A cleanup levels, the applicant shall contact the Tacoma Smelter Plume Technical Assistance Coordinator at the Southwest Regional Office, Eva Barber at (360) 407-7094. The MTCA Method A cleanup level for arsenic is 20 parts per million (ppm) and lead is 250 ppm. The applicant may contact the Technical Assistance Coordinator for help in sampling and interpreting the sampling results. The link below provides more information on how the arsenic and lead cleanup-levels were set and why Ecology sees that they are protective of human health: https://fortress.wa.gov/ecy/publications/SummaryPages/1109095.html.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

Lisa Wood, SEPA/NEPA Coordinator August 16, 2017 Page 2

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology Southwest Regional Office

(SM:17-4115)

cc: Eva Barber, TCP Marv Coleman, TCP Matt Stutsman (Proponent)