

**Association of Bainbridge Communities (ABC)**  
**PO Box 10999**  
**365 Ericksen Avenue, Suite 327**  
**Bainbridge Island, WA 98110**  
December 2nd, 2009

John Kern  
NOAA Restoration Center NW, Bld. 1  
7600 Sand Point Way, NE  
Seattle, WA 98115

**Subject:** Comments on Pritchard Park West Shoreline Restoration project (SEA)

Dear Mr. Kern:

**BACKGROUND**

ABC has been involved with the Pritchard Park/Wyckoff Superfund site for 25 years. Although there is still a lot of work to be done to fulfill the vision of a site which is clean and natural again, we have been encouraged with the tremendous efforts and successes by citizens and government alike to turn this goal into reality. We feel the shorelines restoration described in the Draft SEA dated November 20<sup>th</sup>, 2009 will be another part of this long effort as it will extend the beach area westward. We had read the original restoration plan dated October 4, 2008 and also attended meetings held to go over this and the other related projects. A number of the concerns expressed below were in fact brought up by ABC at one of those meetings, and we were disappointed they were not included in the November 20<sup>th</sup> supplement, and therefore hope they will now be added into the final report.

**ADDITIONAL POINTS**

1) Importance of Over Water Vegetation

There are trees and other plantings which now are located close to, or could even be hovering over ordinary high water. It should be emphasized that this vegetation cools the water and provides insects for salmon to eat. This later point has recently been found to be an important food source. Figure 3 of the Supplement shows the 6 existing significant trees which are to be removed, and the two along the shoreline which are to be protected. Although there is sketch of the vegetation restoration in the report, there is no figure actually showing the trees to be planted. **Please include the landscaping plan for the entire affected area so we may be assured the restoration includes adequate native vegetation to fulfill the requirement for environmental restoration.**

2) Vegetarian Maintenance Plan

There is no plan for the maintenance of the planted vegetation. Experience with EPA and citizen planting projects have shown many of those trees and other vegetation have died along the shoreline. Part of the problem is the difficulty and inattention to watering these plants - so necessary during the first two years and even after if we have dry, hot summers. **Please include a vegetarian maintenance plan with a requirement to install an underground water line and pump to provide water from the EPA's well to the restoration site.** This will make it much easier to water the new plants, and reduce the risk that trees will die after the contractor leaves.

3) Environmental Description

The supplemental and original (October 4, 2008) reports mention smelt existing in Eagle Harbor. I recall that a smelt spawning site was once located offshore right where the project will be worked on. Also it was mentioned that eelgrass was "reported" on the northern and southern shores of Eagle Harbor. My observations are that this is not just reported, it is there on the southern shores.

4) Risks

A few risks might have been included. Unfortunately no matter how much we don't want it to happen, there is always a possibility of hitting creosote or some other hazardous material when excavating this area. In the past there have been surprise findings of contamination at places on the site where no one expected them. Although the western end of the site was a log loading area, I recall contaminated material was once moved over here and then moved back during the cleanup. In addition there are no records as to where creosote was dumped over the past 100 years, or where the pipelines were installed. In addition, if the moving equipment for the restoration is brought in by barges, there could be a risk of damage to the harbor bottom, and a check should be done for eelgrass and sand covering there. Should the earthmoving equipment be brought into the site by land, the only route now is through the EPA site.

We look forward to receiving the final report, and of course to the shoreline restoration.

Sincerely,

A handwritten signature in black ink that reads "Charles Schmid". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

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Charles Schmid  
Secretary