

MEMORANDUM | July 28, 2023

**TO** Kevin Dana and David Lacey, Oregon Department of Environmental Quality (DEQ)

**FROM** Peter Shanahan, HydroAnalysis LLC (HALLC); Jennifer Hart and Gail Fricano, Industrial Economics, Inc. (IEc)

**SUBJECT** Five Tribe review of “Preliminary (30%) Design Report Riverbank Source Control Measure, Crawford Street South Site,” dated June 15, 2023

---

This memorandum, submitted on behalf of the Five Tribes,<sup>1</sup> reviews the *Preliminary (30%) Design Report Riverbank Source Control Measure, Crawford Street South Site* prepared by GeoEngineers on behalf of the Crawford Street Corporation (GeoEngineers 2023).

## General Comments

1. Overall, the report appears to be thorough and well prepared. We do, however, have some concerns regarding the proposed post-remediation habitat in the intertidal and shallow subtidal zone. The report indicates that post-remediation, the river bank will be laid back, stabilized, and vegetated with native riparian plants. However, the shoreline will have a very uniform geometry and a sediment cap will be topped by 10-inch rounded rocks (additional specific details provided in Comment #5). If the long-term site use permits, we strongly encourage the Crawford Street Corporation to consider incorporating additional design elements in intertidal and shallow subtidal areas to benefit biota. If there are no technically feasible methods that can improve habitat quality, please provide sufficient justification for the current design plans.

## Specific Comments

2. On page 13, the report indicates that black sand encountered during site work will be removed. Figure 3 identifies two areas where black sand is known to occur on site; however, the site plans in Appendix M include no mention of black sand. Those responsible for construction are likely to rely heavily on site plans. Thus, we recommend that the Construction Notes in Drawing 1.1 include instructions on removal of black sand and the known locations of black sand be shown on Drawing 2.0.
3. On page 17, the report states that a habitat equivalency analysis (HEA) is not anticipated because the site’s source control measure has been developed within the framework of the U.S. Environmental Protection Agency’s Programmatic Biological Assessment (PBA) (EPA 2021). However, the PBA states that “Additional SMA [sediment management area]/project-specific

---

<sup>1</sup> The five tribes are the Confederated Tribes of the Grand Ronde Community of Oregon, the Nez Perce Tribe, the Confederated Tribes of Siletz Indians, the Confederated Tribes of the Umatilla Indian Reservation, and the Confederated Tribes of the Warm Springs Reservation of Oregon.

---

data collection would be conducted, as needed, to supplement existing data to quantify existing and proposed habitat conditions.” We recommend the Crawford Street Corporation coordinate with DEQ and EPA on the need for additional habitat data collection and completion of a HEA to determine any mitigation needs.

4. On page 17, the report indicates that an Inadvertent Discovery Plan will be developed to address potential discoveries of cultural resources during ground-disturbing work. In addition, we recommend the Crawford Street Corporation coordinate with Tribal cultural resource representatives during design.
5. On page 32, the report cites EPA’s PBA for impacts to riverbed habitat from capping (EPA 2021); however, the measure recommending application of a beach mix layer (2.5 inches or less) does not appear to be proposed. Rather than a beach mix, the cap would be covered by 2 feet of coarsened streambed mix with a median diameter of 10 inches. In contrast, beach mix is described as follows in the PBA (EPA 2021, page 57):

“Apply an engineered beach mix layer consisting of rounded gravel typically 2.5 inches or less (or other appropriate native material as determined during project-specific remedial design) to the uppermost layer of all caps and dredge leave surfaces in riverbank and shallow areas. This “beach mix” layer would provide appropriate substrate habitat for colonization by benthic organisms.”

We recommend that the preliminary design report clarify how and if a beach mix is to be incorporated in the sediment cap. If a beach mix is not intended, we recommend the report provide a rationale for its exclusion.

## References

GeoEngineers. 2023. Preliminary (30%) Design Report, Riverbank Source Control Measure, Crawford Street South Site, Portland, Oregon for Crawford Street Corporation. GeoEngineers, Portland, Oregon. June 15.

U.S. Environmental Protection Agency (EPA). 2021. Programmatic Biological Assessment, Portland Harbor Superfund Site. July.