



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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TTY 711

December 21, 2021

Maya Taylor
AECOM
888 SW 5th Ave., Suite 600
Portland, OR 97204

RE: Approval of Remedial Design Change
for Douglas Ridge Rifle Club in Eagle Creek
ECSI #4865

Maya:

DEQ has received and reviewed your December 9, 2021 letter evaluating a proposed change to a remedial design at the Douglas Ridge Rifle Club (DRRC), located at 27787 SE Highway 224 in Eagle Creek, Oregon.

In 2019, DEQ, AECOM and DRRC agreed to pursue a plan to culvert the so-called "Corps Ditch" that runs through the DRRC site. Lead-impacted sediments were removed from the Corps Ditch in 2011 as part of a DEQ-approved cleanup action, but a five-year review in 2016 showed that the sediments had again become impacted by lead, likely from lead shot at the site. DRRC agreed to clean up and then culvert the ditch to prevent future recontamination.

In September 2021, as part of the Section 404 permit application process, the U.S. Army Corps of Engineers (USACE) approved a culverting plan that left open a 99-foot section of the ditch in a forested strip between the Known Distance and Silhouette firing ranges. Unfortunately, further investigations by AECOM have indicated that lead shot likely lands in this forested strip, and that leaving a section of the culvert open may result in recontamination of the Corps Ditch.

DEQ agrees with your analysis that closing the 99-foot gap in the culvert will result in a more protective long-term remedy, and therefore we agree with your request to seek a permit modification from the USACE and other state and federal agencies.

If you have any questions about this letter or the project, please contact me at (503) 229-5369, or via e-mail at kevin.dana@deq.oregon.gov.

Sincerely,

Kevin Dana, Project Manager
Northwest Region Cleanup Program