

**Comment Response Matrix**  
**30% Remedial Design Package**  
**Willamette Cove Uplands**

| Comments from DEQ – 30% Remedial Design Package |                           |  |  |
|---|---------------------------|--|--|
| Reviewer Comment No.                            | Section Name/ Topic       | DEQ Comments 4/14/2026   | Port Response/Action   |
| General 1                                       | Inclusion of Report       | Under normal circumstances, what has been provided would not be considered a complete 30% RD package which is limited to a subset of design drawings and outline. The 30% RD presentation was informative but should not replace a supporting design report that describes the RD approach and advance necessary RD discussions. This includes design details that would be best captured in a 30% RD document to ensure that the design assumptions align with the drawings. For example, linking the remedial action objectives, remedial strategy, and relevant risk calculations to design elements presented in the 30% RD drawings. DEQ requests that future design deliverables include a report to accompany RD drawings and specifications. | Comment noted. The 60% remedial design will include: Design report, plans/specifications and associated appendices. See response to General Comment 2.   |
| General 2                                       | Supporting Documents      | DEQ also expects that supporting documents will be necessary to advance the design and request an outline of the 60% remedial design package and identifying supporting document deliverables. This includes discussing expectations around construction verification methods, leave surface sampling, quality assurance/quality control, schedule, reporting, long-term monitoring, and so on.  | An outline of the 60% remedial design package, including report sections, drawing index, specification listing, and list of work plans is enclosed with this response to comments..  |
| General 3                                       | Preliminary Schedule      | The preliminary detailed schedule should be provided in a PDF form for review, including Construction Phase 2 and Phase 3, identified in the presentation. For example, what areas of the site are to be completed in Phase 2 versus Phase 3? A design document would also be useful to outline the different schedule dependencies including coordination with the in-water work and tasks to complete prior to Metro’s redevelopment as a nature park. Coordination may also be necessary with the EPA regarding Unassigned Areas Fund-Lead 11 (FL-11), also referred to as the Sliver Area. At minimum the performing party will need to access the riverbank from the uplands and in-water.  | The 60% remedial design package will include an updated schedule. To the extent possible, the schedule will be updated to include coordination with the in-water work and EPA work on the FL-11 area. The level of detail that we will be able to provide in the schedule will depend on the status of the design for these other projects.  |
| General 4                                       | Survey                    | Identify surveying planned which is often its own specification. Explain how the extents of removal, removal depths, demarcation placement, and other features will be surveyed.   | The 60% design package will include a description of survey activities planned for various stages of the remedial action.  |
| General 5                                       | Partial Excavation Depths | DEQ has already commented and requested in the draft and revised Basis of Design Report that if partial excavation of DUs is carried forward in RD, that supplemental sampling and decisions be made on a half foot interval (i.e., half of the current 1-foot DU depth). However, the RD drawings specify partial excavations that are not on a 0.5-foot basis at DU-16 (at 2.6 feet), DU-19 (at 2.6 feet), DU-21 (at 2.4 feet), DU-24 (at 1.6 feet). Explain and correct future RD drawings accordingly. Partial excavations in these DUs (already documented as ecological hot spots based on results of the remedial design investigation) are subject to additional remedial design sampling and results approved by DEQ.                       | The Port and Metro are preparing a Supplemental Remedial Design Work Plan (SRDI Work Plan) describing additional sampling proposed to refine excavation depths for selected decision units (as well as characterizing the soil in the Richmond Avenue parcel – new Decision Unit DU-45 – and assessing the soil beneath the concrete pads in DU-37, DU-39 and DU-40 for potential reuse as upland fill material). The proposed samples for refining excavation depths will be collected over a 0.5-foot depth interval at the planned excavation depths. For each DU where the concentrations in the additional sample are below hot spot levels, the final design will target that excavation depth (using the additional sample as verification). If not, the full depth of the 1-foot layer in that DU will be excavated. |
| General 6                                       | Excavation of Soil Berm   | All depths of DU-41, an elongated soil berm, from 0-3 feet below the ground surface (bgs) contain soil above ecological hot spot levels. Confirm the entire DU-41 soil berm will be excavated and then additional excavation will occur below the berm to same depth as adjacent DUs. Presumably separating DU-41 (one ISM sample) into several parts, DU-41a through d, is intended to correspond to the adjacent DU boundaries and different excavation depths shown on Sheet C4.06. However, DU-41d needs further explanation as layer 3 of adjacent DU-30 is planned for excavation (e.g., buried hot spot 2-3 feet bgs).  | The entire soil berm in DU-41 will be removed and additional excavation below ground surface will proceed in alignment with the adjacent DUs. The 60% design package will clearly convey the proposed excavation plan.   |

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| Reviewer Comment No.                            | Section Name/ Topic | DEQ Comments 4/14/2026  | Port Response/Action  |
| General 7                                       | DU-27               | DEQ seeks further discussion of DU-27, which is shown to have a 1-foot cap and no demarcation on C6.04. This DU-27 is slated for excavation from 0 to 2 feet bgs but the underlying layer 3 exceeds human health remediation goals for arsenic and dioxins/furans.  | The primary purpose of the cap is to address residual ecological risk. The cap design is consistent with the proposed protocols (1-foot cap when the ecological hazard quotient is less than 5 and the hazard index is less than 10). Human health risk was evaluated based on the reasonable maximum exposure for exposure areas corresponding to the parcels. The residual risk (without a cap) for the East Parcel is acceptable for human health, so the cap is not needed for protection of human health. As part of the uncertainty evaluation of human health, local exposure (on a DU basis) was evaluated and it was concluded that no additional excavation was needed to address human health. Part of the multiple lines of evidence for that evaluation was that the installation of the cap to address residual ecological risk addresses potential uncertainties related to human health risk. |
| General 8                                       | DU-3                | While DU-3 meets the criteria defined in the BODR for a 1-foot cap and no demarcation, it is an isolated case and there may be other practical considerations to maintain the continuity of the demarcation layer DU to DU for constructability and long-term operation and maintenance purposes.   | The 30% remedial design evaluated excavation/capping on a DU basis. Practical considerations for contouring of the subgrades, and placement of a demarcation layer will be addressed in the 60% remedial design package.  |
| General 9                                       | Drawings            | <p>Drawings:</p> <ul style="list-style-type: none"> <li>a. Herb Clough is listed as the Principal Engineer. Is he also the Engineer of Record?</li> <li>b. There are several placeholders for plans to be submitted and the drawings provide little more than what has already been shown in figures. There are several outstanding questions that are not addressed by this submittal. <ul style="list-style-type: none"> <li>i. How will access be provided?</li> <li>ii. What permits are required?</li> <li>iii. Who is developing the planting plans?</li> <li>iv. What environmental controls will be in place?</li> <li>v. What is the contracting mechanism that will be used?</li> <li>vi. What equipment will be used?</li> <li>vii. Protocols for cultural resources</li> <li>viii. Etc.</li> </ul> </li> <li>c. On Sheet No. C4.02, what is the intention of the note in the corner of DU-39 of "not included in this report"?</li> </ul> | <ul style="list-style-type: none"> <li>a. Herb Clough is the Engineer of Record as well as Principal Engineer.</li> <li>b. The items listed in b. will be included in the 60% remedial design package.</li> <li>c. The area to the northwest of DU-39 is not Metro property and is not included in the Willamette Cove Upland Facility site.</li> </ul>   |
| General 10                                      | Next Steps          | DEQ is not seeking revised 30% RD documents but requests integration of comments into future design deliverables. However, DEQ requests an outline of the forthcoming 60% RD package to advance the completeness of this derivable in terms of drawings, specifications, and corresponding design report and schedule.  | See response to General Comment 2 above.  |

**60% RD Submittal Outline**  
**Willamette Cove Upland**  
**4/15/26**

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**DRAFT Drawing Index****Willamette Cove Upland 60% Remedial Design**

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**DRAFT Drawing Index****Willamette Cove Upland 60% Remedial Design**

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**DRAFT Specification Outline**  
**Willamette Cove Upland Facility**  
**60% Remedial Design**

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|          |  | 01 33 00 | Submittal Procedures                                      |
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