



February 5, 2024

To: Sean Smith, Product Replacement Program Manager  
Washington State Department of Ecology - NWRO  
P.O. Box 330316  
Shoreline, WA 98133-9716

Subject: Comments on Ecology's Draft Programmatic Environmental Impact Statement for the Aqueous Film-Forming Foam Collection and Disposal Program

PO Box 68727  
Seattle, WA 98168-0727

FlySEA.org

—  
Operated by the  
Port of Seattle

Dear Mr. Smith,

Thank you for the opportunity to review and provide comments on the Department of Ecology's Draft Programmatic Environmental Impact Statement (EIS) for the Aqueous Film-Forming Foam (AFFF) Collection and Disposal Program.

During finalization of this EIS, and subsequent selection and implementation of a collection and disposal method, please consider the following comments:

1. **Timeframe.** During the selection process, we encourage Ecology to consider the timeframe in which each of the evaluated alternatives can be implemented. Since the EIS determined all evaluated alternatives pose 'less than significant effect' for all Environmental Resource categories, we encourage you to consider the speed that a program can be implemented as part of your decision-making process. More than five years have past since state funding was appropriated for the AFFF Collection and Disposal program. The more time that passes with AFFF stored throughout our communities, the more opportunity for accidental and inadvertent release of this material. Please take expedient action to lead the removal and disposal of AFFF that is no longer needed or in use in our state.
2. **Alternative Selection.** We understand the rationale for inclusion of Alternative 5: No Action, and Alternative 1: Hold In Place, however we encourage Ecology to select an alternative that includes active collection and disposal processes now. Selecting No Action, or Hold In Place does not, in our opinion, meet the intent of a collection and disposal program, and only moves the burden for disposal of this material further into the future, and onto the individual Fire Departments to coordinate on their own.

We thank you again for your progress on development of this program. Please feel free to reach out to my technical staff (Megan King, [king.m@portseattle.org](mailto:king.m@portseattle.org)) with any clarifying questions, or opportunities for collaboration.

Regards,

*Sarah Cox*

Sarah Cox  
Director, Aviation Environment & Sustainability





# Ecy EIS Comment Letter\_SEA

Final Audit Report

2024-02-05

Created:	2024-02-05
By:	Melissa Child (child.m@portseattle.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAA6xTpIB77LhLXWr1AW3TkQaGY8QaP5cP2

## "Ecy EIS Comment Letter\_SEA" History

-  Document created by Melissa Child (child.m@portseattle.org)  
2024-02-05 - 11:32:14 PM GMT
-  Document emailed to Sarah Cox (cox.sarah@portseattle.org) for signature  
2024-02-05 - 11:32:17 PM GMT
-  Email viewed by Sarah Cox (cox.sarah@portseattle.org)  
2024-02-05 - 11:57:52 PM GMT
-  Document e-signed by Sarah Cox (cox.sarah@portseattle.org)  
Signature Date: 2024-02-05 - 11:58:14 PM GMT - Time Source: server
-  Agreement completed.  
2024-02-05 - 11:58:14 PM GMT