



PUBLIC WORKS DEPARTMENT
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May 29, 2025

Alan Noell
Washington State Department of Ecology
Toxics Cleanup Program
1220 1st Avenue
Seattle, WA 98101

RE: City of Kent Public Comments on Reserve Silica Site Draft Remedial Investigation Report (Facility Site ID: 2041)

Thank you for the opportunity to provide comments on the Remedial Investigation Report for the Reserve Silica site. The City of Kent (Kent) maintains a strong and ongoing interest in the outcome of this cleanup effort due to the site's location within our Wellhead Protection Area (WHPA) and its proximity to critical municipal drinking water infrastructure.

The Reserve Silica site is located within the five-year time-of-travel zone for Kent's Kent Springs WHPA. This source is particularly vulnerable to contamination due to hydrogeologic conditions such as shallow depth to groundwater, highly permeable soils, and lack of confining geologic layers. Protecting both the quality and quantity of this drinking water source is essential for protecting public health and supporting the city's long-term economic resilience.

The City of Kent is concerned by findings in the report indicating that arsenic, lead, and other contaminants have been detected at concentrations exceeding applicable cleanup levels, posing a potential threat to human health and the environment. These concerns reinforce the need for a cautious and scientifically rigorous approach to site investigation and remediation.

The City of Kent requests that the Department of Ecology:

1. Apply conservative assumptions and protective design criteria in all future work plans, feasibility studies, and cleanup actions, in recognition of the site's sensitive location within designated WHPA's.

City of Kent Public Works Department

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2. Maintain open, transparent, and consistent communication with local jurisdictions, water purveyors, and stakeholders, particularly the City of Kent, throughout all phases of the cleanup process. This should include opportunities for technical review and public comment on all major documents and decisions.

We appreciate the Department of Ecology's leadership in advancing this critical cleanup project. The City of Kent looks forward to continued coordination to ensure that all remedial actions fully protect public health and the region's vital drinking water resources.

Please feel free to contact me at (253) 856-5527 if you have any questions or would like to discuss these comments further.

Sincerely,

A handwritten signature in black ink that reads "Evan Swanson". The signature is fluid and cursive, with the first name "Evan" being more prominent than the last name "Swanson".

Evan Swanson
Water Quality Coordinator

c: Mike Mactutis, P.E., Environmental Engineering Manager