



Elevating the voices of those impacted by the Duwamish River pollution and other environmental injustices to advocate for a clean, healthy, and equitable environment for people and wildlife. Promoting place-keeping and prioritizing community capacity and resilience.

December 19, 2022

Department of Ecology

LDW@ecy.wa.gov

RE: North Boeing Field Georgetown Steam Plant Interim Action Work Plan and Broader Environmental Justice Concerns

To Whom it May Concern:

Thank you for providing the opportunity to comment on the North Boeing Field Georgetown Steam Plant site. As we have expressed before, communities should be meaningfully engaged in decisions that will most heavily impact them. As a community steward, we are committed to keeping our community informed and ensuring that they access information in a way that allows them to provide their input.

We want to recognize that overall, the documents released for public review are thorough and well done. With the exception of a few comments that we submit for your consideration, we are satisfied that these documents sufficiently meet MTCA requirements. We believe that this interim clean up will greatly serve our community and look forward to seeing the ways that it is carried out moving forward.

Further, while we understand that the Toxics Cleanup Program is coordinating with the greater Ecology team to address some environmental justice concerns we brought up in our Independent Metals 2 comment letter from November 16, 2022, we believe it is important to reiterate how crucial public involvement is in environmental justice communities and how all Ecology documents must consider environmental justice implications in order to better serve our communities and comply with the HEAL Act. We believe that an Enhanced Community Engagement Process needs to be developed for all environmental justice communities to meaningfully accomplish the HEAL Act. This letter addresses some issues that concern us about both the North Boeing Field Georgetown Steam Plant public meeting and document, but we believe that it has relevance to all MTCA documents released for public comment and all public meetings in environmental justice communities.

I. ECOLOGY SHOULD DEVELOP COMMUNITY ENGAGEMENT STRATEGIES WHEN SAFETY MECHANISMS ARE DEVELOPED.

When Ecology creates strategies related to community safety, there should be an opportunity for community input. In an overburdened community like Georgetown that is in close proximity to significant forms of air pollution such as industries, airports and highways, changes in traffic have greater impacts than it would in other parts of the city. Soil storage could also have similarly greater impacts in a community like Georgetown, whose residents are also facing the health consequences of living near so many contaminated areas.

Community members could offer valuable information related to site security and traffic control and should be informed about whether different options are being considered. Plans for traffic, dust and noise control, and transport of excavated soil will have a direct impact on community safety and Ecology should develop a way to engage communities, particularly environmental justice communities, on these aspects of work plans.

II. ECOLOGY SHOULD ACKNOWLEDGE CUMULATIVE HEALTH IMPACTS IN ALL MTCA DOCUMENTS IN ENVIRONMENTAL JUSTICE COMMUNITIES.

It is incredibly important for Ecology to be considering the unique needs of an environmental justice community at all stages of cleanup. This consideration should then be reflected in all planning documents used for the site. One way for Ecology to recognize the unique needs of environmental justice communities like Georgetown is to acknowledge that these communities are exposed to multiple contaminants throughout their community, which creates additive risks. Acknowledging this will validate the lived experience of community members and show the ways that Ecology is factoring in the ways that a cleanup like the one at the North Boeing Field Georgetown Steam Plant should be more restrictive than cleanups in more affluent areas of Seattle.

III. ECOLOGY SHOULD INCLUDE SUBSTANTIVE REVIEWS OF TECHNICAL DOCUMENTS AT PUBLIC MEETINGS.

Finally, Ecology should also conduct a more substantive explanation of the documents in these presentations. The majority of the public does not have the time to review them, and many of them are lengthy and technical. While an overview of the MTCA process is helpful, it can become repetitive when similar content is being shared at different public meetings for different sites. Many of the documents that Ecology asks for public comment on are extremely long and difficult to understand. For example, for this particular site, the Interim Action Work Plan was 677 pages with technical maps, tables, and appendices that make this document inaccessible to the vast majority of the general public.

Combined with the aforementioned burden of having multiple public comment sites ongoing in the Duwamish Valley, Ecology should do a better job of taking more ownership of their role in creating an equitable process by presenting on the content of the documents they are seeking comment on. This would bring more people into the process who previously lacked the time and resources to do their own review and help remedy the power balance that exists between a state agency and an overburdened community.

IV. ECOLOGY SHOULD DEVELOP ENHANCED COMMUNITY ENGAGEMENT PRACTICES.

When there are several sites to be commented on in a single community, an Enhanced Community Engagement Process should be implemented. One component of this should include a way to combine multiple sites so that community members do not need to attend several different meetings that repeat the same general information about the MTCA process. Then, there should be time in the combined meeting to go over the documents that are being reviewed for public comment. This could be done with breakout sessions.

As a part of an Enhanced Community Engagement Process, Ecology should also invite local community organizations to co-present. This would raise attendance and let people present who have a standing relationship with the community and experience communicating technical information to the general public. Community organizations could also talk about how to do public comment at these meetings. Many groups have insight into what could make the public comment more accessible, and what information community needs to be able to feel more comfortable participating in these processes. Having a review of this information at Ecology meetings would serve as a helpful way to remind people about what they should include in their comment and how to navigate the site to submit their comment. This will be particularly useful in environmental justice communities where many people do not speak English as their primary language.

The Washington Department of Ecology should also provide opportunities for local community based organizations to review presentations beforehand to make content suggestions. This could give Ecology a better understanding of what community is interested in learning about and what topics would use editing for clarity.

In summary, we believe that the Department of Ecology should (1) develop community engagement strategies when safety mechanisms are developed, (2) acknowledge cumulative health impacts in all MTCA documents in environmental justice communities, (3) include substantive review of technical documents at public meetings, and (4) develop enhanced community engagement practices.

We appreciate this opportunity to provide comments. Please do not hesitate to contact us if you have any questions.



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