



*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.*

October 24, 2023

Sandra Matthews  
sandra.matthews@ecy.wa.gov  
Site Manager

**RE: Snopac Remedial Investigation and Feasibility Study**

To Ms. Matthews:

The Duwamish River Community Coalition (DRCC) has long been a community steward for environmental justice in the Duwamish Valley, which is one of the most polluted areas in the entire Pacific Northwest following 100 years of industrial dumping and release of toxic waste. DRCC has worked tirelessly alongside community groups and neighbors for 20 years to clean up the water, land and air while fighting to eliminate ongoing industrial pollution that makes our communities among the least healthy in the County.

Our MTCA work over the past several years has included engaging the community in creative ways such as through in-person gatherings, community events, and multilingual social media and video interactions to bring some of this information to the community and gather their input. We prioritize the voices of those who are directly impacted by these changes to ensure that our impacted low-income and black/indigenous/people of color immigrant, refugee, and fisher communities who already suffer the greatest exposures and health disparities can be meaningfully informed and engaged.

As we have expressed in previous comment letters, 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. However, DRCC did not receive an Ecology Public Participation Grant for 2023-2025. This means that we are no longer able to support the type of engagement that we had been doing previously, including but not limited to: multilingual advertising and attending community meetings; sharing MTCA site details at community-hosted events with DRCC created materials; and detailed comment letters informed by thorough review of all site document with consultation by technical advisors. In light of this fact, Ecology can no longer rely on DRCC's community expertise and it will need to conduct its own community

outreach. We strongly recommend the Department of Ecology to interact with the community directly and to ensure that the concerns of impacted communities are captured, as is required by the spirit of the Healthy Environment for All (HEAL) Act. In the future, we may be able to provide short form bulleted comment letters in some cases.

We include this background information in order to remain transparent as a community-based organization and as a request to the Department of Ecology to reevaluate the way their existing funding structures and reliance on overburdened communities and grassroots organizations to perform uncompensated labor is antithetical to principles of environmental justice and equity.

With regard to DRCC's review of the Snopac Remedial Investigation and Feasibility Study and associated documents, we offer this limited review below:

We are in general concurrence with the Preferred Alternative with the following concerns:

- We are concerned about the groundwater monitoring stopping after 4 consecutive results comply with cleanup levels for two reasons:
  - i. It is our understanding that sea-level rise has potential to impact groundwater in the Duwamish Valley aquifers migration to the river and more contamination may reach the river than originally modeled. We do not see this analysis in the RI/FS. As climate change becomes a bigger concern in overburdened communities, Ecology should include more information in all MTCA planning documents outlining climate resilience considerations.
  - ii. The December 27, 2022 Duwamish River overtopping event occurred approximately 25 years earlier than expected. No analysis has been made how a flood event like this would potentially release contamination into the river. If there are more events like this, we believe that groundwater monitoring should be restarted to ensure that no new contamination is reaching the river.
- Ecology should include more details that connect the preferred alternative to Source Control Sufficiency. How does the remedial alternative aid in achieving sufficiency? All MTCA sites in the Duwamish Valley should contain explicit information connecting the cleanup to Source Control Sufficiency work as part of the larger river clean up initiative.
- The FS should include information on tribal review as groundwater metal contamination will have a significant impact on clamming, which is part of the local Tribe's fishing rights. As a whole, Ecology should provide more transparency around Tribal consultation frameworks, particularly related to decisions that will impact Tribes.
- Feasibility Studies should include an environmental justice analysis, especially for MTCA sites in overburdened communities, as required by the HEAL Act.

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



Jamie Hearn  
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Duwamish River Community Coalition

