



*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.*

January 9, 2024

David Butler  
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Site Manager

**RE: Boeing Isaacson Thompson Remedial Investigation and Feasibility Study**

To Mr. Butler:

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 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 Boeing Isaacson Thompson (Boeing IT) Remedial Investigation and Feasibility Study and associated documents, we offer this limited review:

DRCC does not concur with the proposed Preferred Alternative, as we are concerned about its long term protectiveness. We are also concerned that the FS does not adequately discuss climate change impacts or Green Remediation alternatives such as habitat restoration along the Duwamish River and its communities:

- Extent of soil excavation/remediation: The arsenic concentrations in groundwater migrating to the Lower Duwamish Way (LDW) Superfund site are excessively high. We believe that the placement of the Permeable Reactive Barrier (PRB) is too close to the river and should be moved back farther into the site order to achieve better source control for the Lower Duwamish Way (LDW). This would require more soil excavation than recommended in the Preferred Alternative. Moving the PRB farther inland would give more room for possible failure of technology and subsequent response.
- Steel bulkhead installation to replace Port Sliver wooden bulkhead: We do not agree that placing a steel bulkhead to deter groundwater contamination and/or prevent erosion along the riverfront is appropriate. While we understand that installation of bulkheads and/or slurry walls are intended to contain onsite contamination, we do not believe that they contribute to restoring the environment, including supporting increased water storage during flood events due to sea level rise and climate change. They do not improve nor protect habitat for the river.
- South portion of shoreline: The discussion on what will occur south of the Port sliver is inadequate. It is unacceptable to use a "wait and see" approach. It is important to develop some alternatives in the FS on how the south portion of the site will be treated. We strongly recommend that this area is considered for a new habitat restoration area (see below).
- Climate Change Vulnerability Assessment:
  - i. Revised MTCA (WAC 173-340) regulations call for attention to climate change at MTCA clean up sites. We request that all MTCA cleanup sites in the Duwamish Valley follow *Sustainable Remediation: Climate Resiliency/Green Remediation*

*Guidance* (Ecology Publication No 17-09-052), and conduct Climate Change Vulnerability Assessments (CCVA).

- ii. For the Boeing IT FS, the climate section is weak and does not follow the Sustainable Remediation Guidance. We request that the CCVA be fully presented.
- Green Remediation: According to the *Sustainable Remediation: Climate Resiliency/Green Remediation Guidance* (Ecology Publication No 17-09-052), Boeing IT would be classified as a Tier 3 complex site. DRCC believes that the FS should have included a Green Remediation analysis and its costs as part of the Remedial Alternatives. We propose installation of a habitat restoration area similar to T117 (People's Park) and Boeing Plant 2. Both of these restoration sites have proved to be climate resilient by increasing water storage during flood events such as the one on December 27, 2022. They have also improved fish and wildlife habitat which has supported Chinook recovery goals. In addition, both sites improve human health by increasing the beauty of the river and access to the environment. We request that pilot studies be incorporated into CAPs for sites that include or are in close proximity to public access areas to determine how restoration work can be utilized as part of cleanup.
  - The CAP should include an in-depth assessment of how landscaping and vegetation management plans can be utilized as part of the selected remedy in accordance with Shoreline Management Act compliance.

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



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