DUWAMISH TRIBE
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Jun 9, 2026

Washington State Department of Ecology

Facility Side ID: 1940187 Cleanup Site ID: 2520

Dear Beau Johnson,

Thank you for the opportunity to comment on the Crowley Marine Services – 8th Ave S project to compare cleanup alternatives located at 7400 8th Ave S in Seattle. The Duwamish Tribe understands that the current feasibility addendum from November 2025 updates the 2024 draft cleanup study. The study included new groundwater monitoring, sediment data, PFAS testing, climate resilience analysis, groundwater modeling and revised cleanup alternatives.

The 8th Avenue Terminals Site lies within the ancestral and contemporary cultural landscape of the Duwamish Tribe and within the historic estuarine environment of the lower Duwamish River watershed. Prior to industrial development, this area consisted of tidelands, marshes, river channels, and nearshore habitats that supported fishing, shellfish harvesting, travel, trade, and seasonal occupation by Duwamish people for thousands of years. The site and surrounding shoreline therefore possess cultural significance because they are part of a larger traditional cultural landscape associated with Indigenous use of the Duwamish estuary.

Environmental monitoring documented in the March 2024 groundwater investigation indicates that subsurface groundwater conditions remain influenced by historical industrial activity at the property. Field sampling conducted across multiple shallow and deep monitoring wells identified elevated conductivity, localized petroleum-related compounds, metals, and other industrial contaminants in portions of the site groundwater system. Parameters measured during low-flow sampling included pH, oxidation-reduction potential, dissolved oxygen, conductivity, turbidity, and groundwater elevation. Laboratory analyses included volatile organic compounds (VOCs), semi volatile organic compounds (SVOCs/PAHs), metals, PFAS, petroleum hydrocarbons, PCBs, and dioxin/furan-related analytes.

Several monitoring wells showed evidence of degraded groundwater quality that may reflect long-term industrial land use within the former estuarine environment. Constituents detected in varying concentrations included arsenic, PAHs, petroleum hydrocarbons, and low-level VOCs. Groundwater samples also exhibited occasional discoloration, moderate turbidity, or elevated salinity/conductivity, particularly in deeper wells. These findings are relevant from a cultural resources perspective because contamination within historic shoreline and tidal deposits may affect resources of importance to the Duwamish Tribe, including archaeological deposits, traditional ecological resources, and culturally significant aquatic habitats connected to the lower Duwamish watershed.

Although the investigation primarily focuses on environmental characterization rather than archaeological investigation, the work demonstrates that there is a high probability that intact subsurface deposits remain present beneath portions of the developed property. The presence of fill, shallow groundwater, estuarine sediments, and historic alluvial deposits indicates the potential for deeply buried archaeological materials associated with pre-contact Indigenous occupation or use areas. Because the lower Duwamish corridor has a high sensitivity for archaeological and traditional

cultural resources, any future intrusive ground disturbance associated with remediation, redevelopment, utility installation, or deeper excavation should be conducted with consideration for inadvertent discovery protocols and Tribal coordination.

From the perspective of the Duwamish Tribe, remedial alternatives at the 8th Avenue Terminals Site should be evaluated not only for their effectiveness in reducing contamination, but also for their ability to protect ancestral landscapes, buried archaeological deposits, traditional ecological resources, and the cultural relationship between the Duwamish people and the lower Duwamish estuary.

Under a No Action Alternative, contaminated groundwater and subsurface materials would remain in place without additional remedial controls. From a Duwamish cultural resources perspective, this alternative would not adequately address ongoing risks to the ancestral estuarine environment historically used for fishing, shellfish gathering, travel, and settlement. Residual contamination could continue to affect groundwater migration pathways and ecological conditions connected to the lower Duwamish watershed. This approach also fails to advance restoration of culturally important aquatic habitats or environmental health within the Tribe's traditional territory.

Alternatives relying primarily on institutional controls, engineered caps, or long-term containment would provide some reduction in exposure while minimizing large-scale excavation. From a tribal cultural resources standpoint, these approaches may offer the benefit of reducing disturbance to potentially intact archaeological deposits buried beneath fill and industrial sediments. Because the lower Duwamish corridor possesses high archaeological sensitivity, avoiding deep excavation may reduce the likelihood of disturbing ancestral cultural materials, buried shorelines, or traditional use surfaces.

However, containment-based remedies may also leave contamination in place for generations. The Duwamish Tribe views this as inconsistent with long-term stewardship and restoration goals for ancestral waterways. While these alternatives minimize direct physical impacts to buried cultural deposits, they may perpetuate environmental conditions that continue to impair culturally significant ecological resources.

Excavation and source-removal alternatives generally provide a more permanent reduction of contamination by removing impacted soils, sediments, or groundwater source materials. From a Tribal environmental justice perspective, these alternatives better support long-term restoration of the estuarine ecosystem and reduce future contaminant migration into the lower Duwamish watershed.

If excavation-based alternatives are chosen, the Duwamish Tribe would recommend and request the following:

- Formal Tribal consultation,
- Inadvertent discovery protocols,
- Tribal monitoring during ground disturbance,
- Archaeological review and coordination procedures.

From the Duwamish Tribe's perspective the most appropriate strategy would be one that:

- Permanently reduces contamination,
- Restores environmental function of the estuarine landscape,
- Minimizes unnecessary disturbance to intact archaeological deposits,
- Incorporates meaningful Tribal consultation and monitoring,
- Recognizes the site as part of a broader Indigenous cultural landscape rather than solely an industrial property.

The Duwamish Tribe maintains continuous cultural, historical, and spiritual relationships to the lower Duwamish River and adjacent tidelands. Environmental remediation and long-term groundwater

management therefore support not only regulatory compliance and ecological restoration objectives, but also broader Tribal interests in restoring the health, integrity, and cultural continuity of ancestral waterways and shoreline environments. Continued consultation with the Duwamish Tribe is recommended during future phases of site planning, remediation, and redevelopment to ensure that Tribal concerns regarding cultural resources, traditional land use, and environmental stewardship are appropriately incorporated into project decision-making. We note that there are at least 6 ancestral place names within about a half mile of the project location. The DAHP WISAARD predictive model indicates that an archaeological survey is highly advised with a high risk for encountering cultural resources.

The Duwamish Tribe requests that if any archaeological work or monitoring is performed, we would like notification. Cultural and archaeological resources are non-renewable and are best discovered prior to ground disturbance. The Tribe would also like the opportunity to be present if or when an archaeologist is on site.

In addition, the Tribe strongly recommends only native vegetation be used if there is any proposed landscaping to enhance habitat for fish and wildlife, and native avian life and native pollinators. The Tribe supports observing critical area tracts and stream buffers to preserve any remaining wetlands and stream buffers. Loss of wetland habitat is known to affect the viability of fish, water quality and increase the effects of seasonal urban flooding.

Finally, we request that any permanent lighting associated with the project be dark sky compliant to reduce light pollution. Darkened skies were favorable conditions to practice traditional life pathways.

Thank you,

Duwamish Tribal Historic Preservation

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