



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. We promote place-keeping and prioritize community capacity and resilience.

April 22nd, 2026

Letter to: the Department of Ecology
Re: South Park Marina Site Public Comment
On behalf of: the Duwamish River Community Coalition (DRCC)

Dear Department of Ecology,

Thank you for creating this Draft Remedial Investigation (RI). When reading through this report, our priorities lie with our neighbors. As a community-based organization rooted in the Duwamish Valley, we bring forward the lived experiences, technical knowledge, and long-standing advocacy of residents most impacted by contamination in the Lower Duwamish Waterway. People who live in Georgetown and South Park have some of the most severe health inequities in our region. Childhood asthma hospitalization rates are among the highest in the City of Seattle, and life expectancy is approximately 10 years shorter when compared to wealthier neighborhoods and seven years shorter when compared to the King County average (*Public Health - Seattle & King County Assessment, Policy Development & Evaluation, 2023*). Our community also lives in close proximity to several contaminated waste sites and suffers from air pollution caused by both King County International and Seattle-Tacoma International airports, over 1400 industrial facilities operating in the Valley, drayage truck and traffic congestion, and three highways blanketing our neighborhoods.

The straightening, widening, and deepening of the River to accommodate industry in the early 1900s, the continued settler occupation of the land, and zoning decisions thereafter changed the landscape so severely and legalized dumping of waste into the River for so many decades that these cleanup efforts are just the beginning of the myriad reparations required to heal our lands and waters. The River continues to impact the community: In December, 2022, South Park was severely impacted by the river overtopping and simultaneous release of combined sewer overflow waters into several residents homes due to a climate change related event.

When viewing the South Park Marina draft RI through this lens, we offer the following comments:

Tribal Considerations

We request that you explicitly acknowledge that the Duwamish Waterway is a Usual and Accustomed harvest area for the Suquamish, Muckleshoot, and Yakama federally recognized tribal nations, and is a site used for subsistence fishing for Duwamish Tribal members and additional Duwamish Valley neighbors, many of whom are immigrants, people of color, or low-income, and the source control cleanup sites are vital to the health and safety of the residents.

Full Containment Boundary

What is the full contamination boundary? Does it extend into the federal navigation channel, or through groundwater movement north or south of the site? Even though the former T117 (People's Park) is located upgradient of the bulk of SPM contamination, do we have evidence that T-117 has stayed "clean"? What will the considerations be for the intertidal mudflat habitat?

Conceptual Site Model

We would like to ensure that you are aware that several people reside full time on boats at the marina. We would like to ensure that you have accurately assessed their exposure with regard to both living on the boats as well as access on and off the site.

Cleanup Considerations

Boat residents

How will the cleanup coordinate with boat residents and provide the necessary considerations? Will residents be removed from the site? Please provide a residential map of the adjacent properties along Dallas Ave S from 14th-17th Ave S, as well as an accounting of all residents living or working on boats in the Marina.

Future land use and zoning

We request that you coordinate with the City of Seattle to ensure that mixed use zoning is preserved for Dallas Ave S, reflecting the reality of long-time neighbors living across the street and maintaining the public access and recreational opportunities that the Marina site brings to South Park residents (see photo below). We understand that the FS alternatives will clean up to residential levels of PCBs and other contaminants of concern to comply with state laws.

PCE cleanup

Since you are unable to contact the former owners and address PCE at the source, we would like to have a clear understanding of how you will address the treatment of the upgradient PCE and other volatile constituents entering the site in the FS. Will there be a cleanup alternative that

addresses cleanup at the upgradient property line? This is particularly important for a future land use that allows for residential housing and a maritime academy.



Credit: [Google Maps](#)

Empirical demonstrations:

What concerns does Ecology have about contaminants migrating offsite? Do we need any studies that will be coordinated before or during feasibility study drafting?

Sea level rise and flooding in South Park

We appreciate the fact that the RI addressed climate change in its document but its three paragraphs feel scanty given that there was a significant river overtopping and combined sewer overflow event in December, 2022. Sewage from the overtopping entered people's homes and it is unknown how contamination in ground water from adjacent contaminated waste sites was distributed. We do not believe the projections cited in the RI are accurate. We also do not

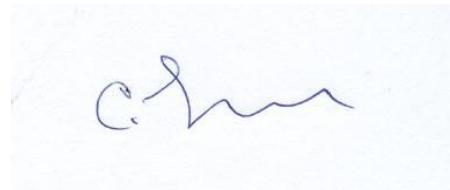
believe that the RI has appropriately addressed contamination issues at the site in light of this event.

We have consistently discussed our concerns about sea level rise and flooding in South Park and have not been happy with the types of engineered solutions that have been consistently proposed up and down the River. We are very interested in hearing about cleanup alternatives that consider nature-based solutions to accommodate SLR and flooding (consider the [University of Washington and DRCC Living with Water Report](#); 2026).

Thank you for considering our comments. It is no accident that the history of polluting the Duwamish Valley has led to this concentration of contaminated waste sites in close proximity to residents and neighbors. Our environmental justice community is highly sensitive to the cumulative impacts of multiple stressors. We strongly advocate for the highest level of cleanup possible to remediate past inequities, amplify equity, and improve community health.

Sincerely,

Alexandra L Johnson

A rectangular box containing a handwritten signature in blue ink, which appears to be "C. Linn Gould".

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