

Suquamish Tribal Comments on the South Park Marina Remedial Investigation

1. Please include in this document (where appropriate) that the Lower Duwamish Waterway is within the Usual and Accustomed (U&A) harvest areas of three Washington Tribes (Suquamish, Muckleshoot, and Yakama). It should further be stated that PCUL's must ensure the protection of tribal harvesters, consistent with the LDW ROD and supporting risk assessments.
2. The attached figures identify the property boundary of the site, but not the "Site Boundary". Modify either a current figure or create a new figure that identifies the site boundary as defined by MCTA.
3. Section 6.2.2.2 - The applicability of using a Simplified Terrestrial Ecological Evaluation (TEE) per WAC 173-340-7490 is for determining whether a release of hazardous substances to soil may pose a threat to the terrestrial environment by characterizing threats to terrestrial plants or animals exposed to hazardous substances in soil, and establishing site-specific cleanup standards for the protection of terrestrial plants and animals. This form of a TEE is not appropriate for protection of sediments, which is one of the main drivers for remediating this site. Therefore, the Soil Protection of Sediment via GW PCUL's for the Lower Duwamish Waterway should be used as the most protective PCUL for this site. The LDW PCUL's are based on protection of tribal harvesters.
4. Section 8 – Current or future land use (including current physical structures) should not be utilized as a basis within a RI for elimination of PCOC's; that is a discussion and evaluation that should take place in the FS. Also, would recommend using "*pathways are not currently complete*" vice "*incomplete*". Though mentioned, evaluation of soil to groundwater to sediment exposure pathways are not discussed in the soil evaluation sections.
5. Conclusions (and supporting appendices). Adjust the Conclusions section to address the above comments.