

Suquamish Tribal Comments on the Jorgensen Forge Upland 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. Section 4.2, screening levels - The applicability of using a Simplified Terrestrial Ecological Evaluation (TEE) per WAC 173-340-747(9) (as outlined in section 6.3) only applies for determining a soil to groundwater pathway for protection of groundwater, not a soil to groundwater to sediment pathway based on recontamination of sediments. 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.
3. Section 6 – As stated earlier, the use of a TEE appears inappropriate for this site. Furthermore, future land use 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.
4. Summary and Conclusions (and supporting appendices). The elimination of CPOC's is not appropriate in the RI unless based on a natural background or below an appropriate PCUL. Retain all detected CPOC's above screening levels.