DUWAMISH RIVER
COMMUNITY COALITION

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: Jorgensen Forge Corp Site Public Comment
On behalf of: the Duwamish River Community Coalition (DRCC)

Dear Department of Ecology,

Thank you for creating this draft remedial investigation report. 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 this cleanup effort is just the beginning of the myriad reparations required to heal our lands and waters.

When viewing the Jorgensen Forge Corp site through this lens, we offer the following recommendations to the draft plan:

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.

Alternatives

The preferred alternative in the Feasibility Study is Alternative 3, which consists of targeted excavation for LNAPL recovery and ISS in Areas 1 and 2, capping and monitored natural attenuation in other areas and institutional controls, as needed. This alternative will leave LNAPL and will not include a permeable reactive barrier (PRB) wall.

We are advocating for Alternative 4. Alternative 4 would provide the highest level of protectiveness by removing the greatest amount of LNAPL at the site. Because of the proximity to the LDW this consideration should receive higher weighting. As noted in the FS, Alternative 4 scores the highest for permanence because it would remove the greatest amount of LNAPL. Both Alternative 4b and 3b also provided a higher score for effectiveness because of the role of the PRB in controlling offsite migration of PFOS.

Final Contaminant Boundary Delineation

The FS states that the approximate footprint of the targeted excavation will be determined based on the estimated thirty-percent excess soils generated during ISS treatment. What is the plan of action if the LNAPL has shifted laterally, especially given the proximity to Boeing Isaacson?

Stormwater Drainage System

The FS notes that a stormwater treatment system and outfall will remain onsite following the cleanup. The treatment system is not mapped in the FS, limiting our ability to understand potential contaminant migration pathways to the Lower Duwamish River. Please provide an updated map showing the above and belowground (if applicable) stormwater infrastructure and any assessment that has been made of leakage.

Permeable Reactive Barrier

The preferred alternative, Alternative 3, does not include the PRB. The PFAS Release Area is located within the footprint of Area 2, occupying an area of roughly 18,000 square feet, and is in close proximity to Boeing Isaacson. Currently only two groundwater monitoring wells are

located south of the "inferred" LNAPL plume. If a PRB is not utilized, the number and depths of wells will likely need to be increased to detect potential migration.

Without the permeable reactive barrier wall how would PFAS movement be controlled or other contaminants that could migrate offsite? How would this affect potential migration into Boeing Isaacson?

Additionally, for treatment/cleanup of PFAS, an adaptive management approach should be taken. Treatment and cleanup levels for PFAS are continuing to rapidly develop and the cleanup should reflect that through an adaptive management approach. Most research related to PFAS-remediation is based on laboratory-scale studies under ideal conditions that do not represent the complexity of PFAS-contaminated media.[1] Excessive precipitation and tidal fluctuations may reduce effectiveness and should be evaluated as well.[2] ***A pilot scale PRB should be explored for any alternatives that propose the use of a PRB. Will there be a treatability study? What other sites have shown its effectiveness or not?***

Excavation of LNAPL

The FS proposes to excavate contaminated soil down to 12-15 feet below ground surface, and leave the hole open for an undetermined period of time while collecting additional LNAPL with sumps, skimmers and pumping systems. We are concerned about the potential impacts of this approach on contaminant migration, especially in the Alternatives where LNAPL will remain onsite. Given the dynamics at the site, such as tidal fluctuations, and groundwater connectivity to adjacent parcels, we are concerned that this approach has the potential to encourage additional vertical and lateral migration and distribution of contaminants.

LNAPL does not float on the water table in a uniform, high-saturation, flat layer. LNAPL is distributed above, at, and below the water table at saturations that vary vertically depending on past conditions such as LNAPL driving head and water table fluctuations.

During and after the excavation and the pumping, the remaining LNAPL could be redistributed in unanticipated ways that could affect the site, adjacent sites, and the Lower Duwamish River. The changes in pressure from the excavation and pumping (e.g., changes in head) may encourage LNAPL to move along a vertical gradient or lateral gradient depending on the porosity of the soils and rock. Once it encounters less permeable areas, it may move laterally. Depending on the depths and media, LNAPL then may be partitioned into various forms such as gas, groundwater and soil. ***How will partitioning of LNAPL that could occur after implementation be addressed?***

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[1] Technology status to treat PFAS-contaminated water and limiting factors for their effective full-scale application
[2] In Situ Treatment‐Train Remediation of Per‐ and Polyfluoroalkyl Substance–Impacted Groundwater - Pourabadehei - 2025

How will potential for migration be addressed during implementation? Removal of soils and of floating LNAPL will likely change pressure head and may lead to enhanced migration. How will this be monitored and offsite movement be prevented? Has this potential impact been modelled? If this effort is being tested at the Boeing IT site, how are you going to factor those results into this plan?

LNAPL also often "smears" into sediment/soils as groundwater tables rise and fall and thus it may be left at greater depths as water tables fluctuate with tides. Since this site is proximal to the Lower Duwamish River it is tidally influenced and will experience rising and falling water tables, which could trap remaining LNAPL in pore spaces and fractures, where present. While the LNAPL contamination is not adjacent to the Lower Duwamish River, this area is still tidally influenced. ***We would like to better understand how the impacts of rising and falling tides, flooding, and salinity levels have been incorporated into the FS and what controls are necessary to reduce impacts?***

Sincerely,

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