

DUWAMISH TRIBE

Aug 14, 2026

Washington State Department of Ecology

Facility Site ID: 23881883, Cleanup Site ID: 599

Dear Cliff Nale,

Thank you for the opportunity to provide comments regarding the Glacier Northwest Site located at 5900 West Marginal Way SW in Seattle.

The Duwamish Tribe continues to regard this area as culturally, historically, and spiritually significant. As noted in our previous comments of August 19, 2024, the project area lies within the ancestral homeland of the Duwamish people, contains numerous documented ancestral place names in the vicinity, and is located within an area identified by the DAHP predictive model as having a very high potential for archaeological resources.

While previous investigations identified extensive historic filling and industrial alteration of the shoreline, the Tribe remains concerned that intact archaeological deposits may still be present beneath fill and within native landforms associated with the historical Duwamish River shoreline. The remedial investigation documents the presence of native tidal deposits, buried historical shoreline features, and multiple episodes of filling and redevelopment that modified the original landscape.

Accordingly, the Tribe requests the following:

1. Government-to-Government Consultation

- Ecology should continue consultation with the Duwamish Tribe throughout the remedial design, cleanup planning, shoreline reconstruction, dredging, capping, excavation, and any future redevelopment activities.

2. Archaeological Monitoring

- Qualified archaeological monitoring should be required whenever excavation extends below modern fill, pavement, riprap, or disturbed surfaces into native soils, buried shoreline deposits, or previously undisturbed sediments.
- The Duwamish Tribe should be notified prior to archaeological fieldwork and provided the opportunity to observe archaeological investigations.

3. Updated Inadvertent Discovery Plan

- Any cleanup action should include a robust Inadvertent Discovery Plan that specifically addresses archaeological materials, cultural materials, and ancestral human remains.
- Tribal notification procedures should be clearly identified within the plan.

4. Shoreline and Sediment Disturbance

- Because remedial activities may include dredging, capping, shoreline modification, removal of riprap, and excavation in areas that formerly comprised the natural Duwamish shoreline, Ecology should evaluate cultural resource risks associated with these activities before construction begins. The remedial investigation (RI) identifies extensive historical shoreline changes and fill placement that may have buried culturally significant deposits.

5. Long-Term Protection of the Duwamish River

- The Tribe remains concerned about contaminants documented in soil, groundwater, seeps, riverbank materials, and sediments that can affect the ecological health of the Lower Duwamish Waterway. The RI identifies widespread contamination including arsenic, pentachlorophenol, dioxins/furans, PCBs, and other contaminants that have migrated through multiple environmental pathways toward the river.
- Cleanup decisions should prioritize permanent source control and long-term protection of the river and its resources for future generations.

The Duwamish Tribe appreciates Ecology's continued communication regarding environmental cleanup activities occurring within our ancestral lands. We request continued notification regarding archaeological investigations, remedial design activities, and future ground-disturbing work associated with the Glacier Northwest Site.

Sincerely,

Nancy A Sackman

Cultural Preservation Officer

Department of Archaeological and Historic Preservation

Duwamish Tribe



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