

Lower Duwamish Waterway Cleanup Thanks for your comments! Here's what we heard:



Seattle, WA

March 2011

The Lower Duwamish Waterway cleanup took a big step forward recently when the Lower Duwamish Waterway Group, a partnership of City of Seattle, King County, Port of Seattle, and The Boeing Company, submitted a draft study of cleanup alternatives for review by the U.S. Environmental Protection Agency and Washington State Department of Ecology .

EPA and Ecology invited the public to review and comment on the Draft Final Feasibility Study for the Lower Duwamish Waterway. We received more than 300 letters from individuals, businesses, interest groups, tribes, and government agencies and have summarized what we heard in this document.

Who commented?

Most of the letters came from people in and around the Seattle area. EPA and Ecology worked hard to inform and engage local residents, including non-English speakers. As a result, we heard from many community members.

We heard from 15 environmental and community interest groups including People for Puget Sound, the Duwamish River Cleanup Coalition, the South Park Neighborhood Association, the Cascade Land Conservancy, and the Sierra Club.

We heard from more than 40 businesses, many located along the Duwamish River, including Ash Grove Cement Company, Delta Marine Industries, Alaska Marine Lines, Duwamish Shipyard Inc., and Boom Boys Cranes.

The Suquamish and Muckleshoot Tribes submitted letters. Three government agencies also submitted comments; these include the Seattle-King County Public Health, the Washington State Department of Transportation, and the National Oceanic and Atmospheric Administration.

What did we hear?

We received a lot of comments, but the most common are included below.

Selecting a cleanup method

Many people voiced opinions on a preferred cleanup alternative. The alternatives most frequently mentioned were 3C (a combination of dredging, capping and natural recovery), 6R (dredging a large portion of the river), and "DRCC Option 7" (a different option suggested by the Duwamish River Cleanup Coalition that includes a more extensive sediment cleanup than the FS Alternatives and an emphasis on controlling the upland sources of contamination).

"I believe that alternative 3C provides the best solution for the Duwamish in the timeliest manner."

"Only one option (Alternative #6R) provides a permanent cleanup that ensures it is done once and done right."

"The more I read, the more I am in favor of this latest Option #7, specifically addressing contaminants from upriver and the needs of the Duwamish River community."

Each alternative should undergo an Environmental Justice analysis

Many people asked that an Environmental Justice analysis be conducted to identify vulnerable communities affected by the cleanup, and evaluate how these communities will fare under each of the alternatives. They asked that this analysis be included in the Feasibility Study and be a key consideration in selection of a final remedy.

“EJ populations are disproportionately affected by the contamination from the Duwamish River and they will be the ones to bear the brunt of what is not cleaned up under any selected alternative.”

Controlling upland pollution sources

A lot of comments discussed the importance of reducing pollution entering the waterway to avoid new contamination and to help keep cleaned-up areas from becoming contaminated again.

“Upriver pollution source control must be addressed for an effective and equitable cleanup.”

“If upriver sources of contaminants of concern are determined to be high enough to prevent an effective cleanup, then an upriver source control program must be part of the final cleanup plan.”

Who pays for the cleanup?

Businesses and individuals stated concerns about the cost of the project and who will pay for the cleanup. Many business owners along the Duwamish were worried that the cost of paying for the cleanup would put them out of business. Individuals were concerned about tax-payers bearing the costs of the cleanup.

“My concern is for the industrial business along the river. Seattle needs these businesses and the family wage jobs they provide. Don't make them go out of business.”

“I love the polluter-pays principle – please keep it up.”

“We also appreciated that the costs and impact of the cleanup will be borne by area businesses, governments and taxpayers.”

Reaching cleanup levels and goals

Some commenters were disappointed with the FS conclusion that it is not possible to establish cleanup levels that would allow people to eat an unrestricted amount of resident fish and shellfish.

Others were satisfied with the Feasibility Study alternatives and goals.

“The present document is inadequate. We support a cleanup level that will allow safe eating of fish and shellfish.”

“I believe that the list of alternatives outlined in the Draft Final Feasibility Study is complete, comprehensive and protective of the environment.”

“While all options can potentially reduce the risks by up to 90 percent, none would leave the river clean enough to ensure that people can fish freely with no risk to their health.”

Record of Decision (ROD) and selecting a remedy design

Many businesses expressed a desire to allow for flexible cleanup decision making.

“We feel that advance cleanups and the Record of Decision (‘ROD’) must provide a flexible decision-making framework for conducting individual site cleanup actions and provide incentives and legal protection for businesses to move forward with and complete cleanup actions.”

“The ROD must provide a process and contain incentives for waterfront and water-dependent businesses to initiate and complete cleanup actions.”

What happens next?

EPA and Ecology considered all of the comments we received and have provided a letter to the Lower Duwamish Waterway Group requiring several changes to the draft Feasibility Study.

LDWG will revise the Feasibility Study in response to the Agency comments, and it will be finalized in 2011.

Some of the Agencies’ major comments on the FS include requirements to:

- Do more sensitivity analyses to better understand how inputs to the natural recovery model affect its predictions;
- Reevaluate the assumptions used to estimate areas, volumes, costs and durations of the alternatives presented in the FS;
- Incorporate into the FS new treatment technologies such as amendment of sediments with granular activated carbon;



Lower Duwamish Waterway

Photo by John Monnat

What happens next?

Continued

- Reconsider whether potential for scour from ships and tugboats maneuvering in berthing areas has been adequately addressed in the alternatives;
- Include a more thorough discussion of source control activities in the FS;
- Revise the analysis of alternatives to focus more on the differences among alternatives in how quickly exposure to contaminants is reduced, and less on the similarities in long-term model predictions.

The Agencies will prepare responses to some of the major comments we received and post them on our web site. EPA and Ecology will consider all of your comments as we prepare a Proposed Plan for the cleanup in early 2012. Watch for the opportunity to comment on that plan.

Where can you find more information?

Copies of all the comment letters submitted are available at www.ldwg.org along with more information about the Feasibility Study and other environmental documents. Visit EPA for more information about the cleanup at: www.epa.gov/region10/duwamish.html

Visit Ecology for more information about controlling upland sources of pollution and other cleanups at:

www.ecy.wa.gov/programs/tcp/sites/lower_duwamish/lower_duwamish_hp.html

Contact the Duwamish River Cleanup Coalition the Community Advisory Group for the site, at: www.duwamishcleanup.org or (206) 954-0218

1200 Sixth Avenue, Suite 900, ETPA-081
Seattle, Washington 98101-3140

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Thanks for your comments!
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Look Inside to learn

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- ***Who pays for the cleanup?***
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Learn More on the Web

Lower Duwamish Cleanup Information
www.epa.gov/region10/duwamish.html

Controlling upland sources of pollution: Washington State Department of Ecology
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Duwamish River Cleanup Coalition (community advisory group)
www.duwamishcleanup.org