



Response to Comments

Interim Action Work Plan and State Environmental Policy Act (SEPA) Determination

North Boeing Field Georgetown Steam Plant Cleanup Site Seattle, WA

Toxics Cleanup Program

Washington State Department of Ecology

Northwest Regional Office

Shoreline, Washington

March 2023

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¹ www.ecology.wa.gov/contact

Department of Ecology's Regional Offices

Map of Counties Served



Southwest Region 360-407-6300	Northwest Region 206-594-0000	Central Region 509-575-2490	Eastern Region 509-329-3400
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Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
Headquarters	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

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DEPARTMENT OF
ECOLOGY
State of Washington

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Public Outreach Summary

Ecology invited public review a draft Interim Action Work Plan for the North Boeing Field-Georgetown Steam Plant Cleanup Site (Site).

The City of Seattle plans to develop a portion of the Georgetown Steam Plant property into an off-leash pet area and pedestrian path. This project, referred to here as the Georgetown Flume Dog Park Project Area, is located east of 1001 S. Myrtle St between Myrtle St and East Marginal Way. The City of Seattle is conducting this Interim Action under a 2008 legal agreement (Agreed Order) with Ecology.

Ecology invited input on the following documents:

- **Interim Action Work Plan:** This work plan describes the cleanup of contaminated soils on the Dog Park Project Area.
- **State Environmental Policy Act (SEPA) Determination of Non-Significance:** This is the Ecology determination that the cleanup work is not likely to harm the environment.

Ecology's public involvement activities related to this 45-day comment period (November 7 – December 21, 2022) included:

- **Fact Sheet:**
 - US mail distribution of a fact sheet providing information about the documents, the public comment period, online public meeting to approximately 3,500 addresses including neighboring businesses and other interested parties.
 - Email distribution of the fact sheet to 50 people, including interested individuals, local/county/state/federal agencies, neighborhood associations, and interested community groups.
 - The fact sheet was also available digitally through Ecology's [cleanup site webpage](#)².
- **Legal Notice:**
 - Publication of one paid display ad in *The Seattle Times*, dated Friday, November 4, 2022.
- **Site Register:**
 - Publication of 5 notices in Ecology's Toxics Cleanup Site Register:
 - Comment Period Notice:
 - November 3, 2022
 - November 17, 2022
 - December 1, 2022
 - December 15, 2022
 - Response Summary Notice:
 - April 6, 2023

² <https://apps.ecology.wa.gov/cleanupsearch/site/4765>

- Visit [Ecology's Site Register website](#)³ to download PDFs.
- **Media Notification:**
 - Ecology sent a media notice on Monday, November 7, 2022, to Seattle area media outlets.
- **GovDelivery Email System Notifications:**
 - Monday, October 17, 2022: Ecology included outreach information and links for the comment period and public meeting as well as a blog story about two LDW site comment periods in Ecology's October Duwamish River Update which has over 730 email subscribers.
 - Thursday, November 3, 2022: Ecology sent a notice to a list of approximately 30 community groups and organizations with outreach information and links for the comment period and public meeting as well as a blog story about two LDW site comment periods.
- **Email Notifications:**
 - Thursday, November 3, 2022: Ecology sent a notice to internal and external staff involved with cleanup site.
 - Thursday, November 3, 2022: Ecology sent a notice to SEPA review agencies for the SEPA Determination of Non-Significance.
- **Social Media:**
 - **Blog:** On Monday, October 17, 2021, Ecology's Northwest Regional Office posted a story about two LDW site comment periods on [Ecology's blog](#)⁴, which has approximately 1,200 email subscribers.
 - **Twitter:** Ecology – Northwest Region @ecyseattle posted a [tweet](#)⁵ on Monday, November 7, 2022 connecting readers to the comment period including the cleanup site webpage.
- **Online Public Meeting**
 - Ecology hosted an [online public meeting](#)⁶ Wednesday, November 9, 2022 at 6:30 p.m. through the Zoom meeting application. Interpretation was available in Spanish, Chinese, Vietnamese, and Khmer. Ecology and City of Seattle staff presented details on the cleanup site, interim action, the review documents, future land use, and then answered questions.

³<https://apps.ecology.wa.gov/publications/UIPages/PublicationList.aspx?IndexTypeName=Program&NameValue=Toxics+Cleanup&DocumentTypeName=Newsletter>

⁴ <https://ecology.wa.gov/Blog/Posts/October-2022/Cleaning-up-Two-Lower-Duwamish-sites-move-forward>

⁵ <https://twitter.com/ecyseattle/status/1589655931780202496>

⁶ <https://apps.ecology.wa.gov/cleanupsearch/document/117905>

- **Websites:**
 - Ecology announced the public comment period, Ecology’s public meeting, posted the fact sheet (including translations in Spanish, Chinese, Vietnamese, and Khmer), and made the review documents available on Ecology’s [North Boeing Field Georgetown Steam Plant webpage](#)⁷ and Ecology’s [Public Inputs & Events webpage](#)⁸
- **Document Repositories:**
 - Copies of the review documents and fact sheets (including translations) were available for review at Seattle Public Library’s South Park Branch.
 - Outreach materials also directed the public to contact Ian Fawley, Outreach Planner, for document review assistance.

Comment Summary

From November 7 – December 21, 2022, Ecology invited public comments on an interim action work plan and SEPA determination for the Georgetown Flume Dog Park Project Area on the North Boeing Field Georgetown Steam Plant site.

Ecology received comments from three commenters during the 45-day comment period.

Table 1: List of Commenters

	First Name	Last Name	Agency/Organization/Business	Submitted By
1	Jamie	Hearn	Duwamish River Community Coalition	Organization
2	Rosario-Maria	Medina	Georgetown Open Space Committee	Organization
3	Anonymous			

Next Steps

Ecology has reviewed and considered the public comments received on the documents. No changes are necessary to the interim action work plan and it is being finalized. The City of Seattle will proceed with the Interim Action.

Ecology has also reviewed and considered the comments regarding public outreach (see full responses in first comment below) and has also responded to a previous Lower Duwamish

⁷ <https://apps.ecology.wa.gov/cleanupsearch/site/4765>

⁸ <https://ecology.wa.gov/Events/Search/Listing>

Waterway (LDW) site comment period referenced for the Independent Metals Plant 2 site. To access the Independent Metals Plant 2 Response to Comments, please visit: <https://apps.ecology.wa.gov/cleanupsearch/site/12300>

Ecology is committed to making several changes for Lower Duwamish Waterway (LDW) sites that will help the public review technical documents:

- For public comment periods, particularly those with lengthy primary documents, Ecology will strive to upload the main document separately from the appendices, and link to the main document only instead of the full-length document with appendices. The whole document will still be available via the website but separated for easier reviewing. This will allow the public to view the most important sections first, and focus their review on a smaller, more manageable sized document.
- For documents that generally include an Executive Summary (such as a remedial investigation), in addition to the separate document uploading, Ecology will separately upload and link to the Executive Summary to provide a shorter version of the longer document. This document serves as a general summary of the document, but provides more detail than a fact sheet.

The North Boeing Field Georgetown Steam Plant is continuing the cleanup process for the site overall. Ecology will make the future Remedial Investigation, Feasibility Study, and Cleanup Action Plan available for public review and comment.

See graphic below and visit Ecology’s [cleanup process webpage](#)⁹ to learn more about Washington’s formal cleanup process.

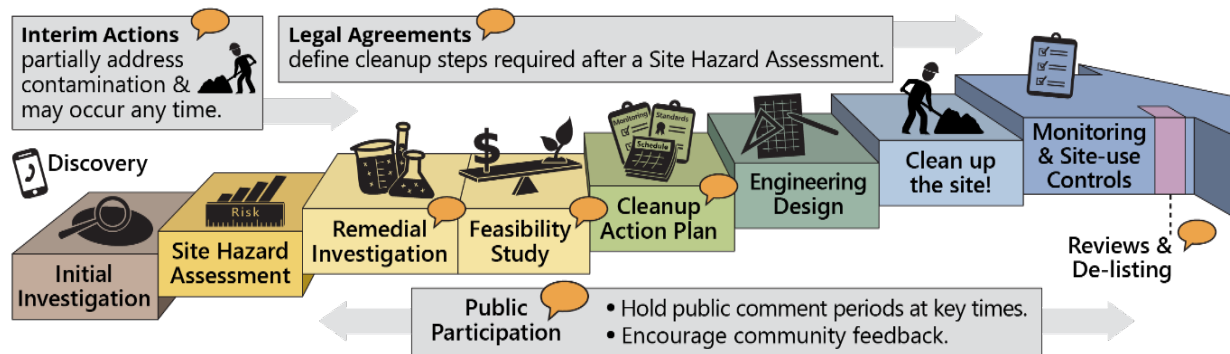


Figure 1: Washington's formal cleanup process ([download a text explanation](#)¹⁰)

⁹ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process>

¹⁰ <https://apps.ecology.wa.gov/publications/SummaryPages/1909166.html>

Comments and Responses

The public comments are presented below, along with Ecology’s responses. Appendix A, page 20, contains the comments in their original format.

Comment from: Jamie Hearn (Duwamish River Community Coalition)

[See original formatted comment letter attachment in Appendix A. The comment below has been divided into comment sections to better organize responses.]

Comment Section 1



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. Promoting place-keeping and prioritizing community capacity and resilience.

December 19, 2022

Department of Ecology

LDW@ecy.wa.gov

RE: North Boeing Field Georgetown Steam Plant Interim Action Work Plan and Broader Environmental Justice Concerns

To Whom it May Concern:

Thank you for providing the opportunity to comment on the North Boeing Field Georgetown Steam Plant site. As we have expressed before, communities should be meaningfully engaged in decisions that will most heavily impact them. As a community steward, we are committed to keeping our community informed and ensuring that they access information in a way that allows them to provide their input.

We want to recognize that overall, the documents released for public review are thorough and well done. With the exception of a few comments that we submit for your consideration, we are satisfied that these documents sufficiently meet MTCA requirements. We believe that this interim clean up will greatly serve our community and look forward to seeing the ways that it is carried out moving forward. [...]

Response Section 1

Thank you for your comment.

Comment Section 2

[...] Further, while we understand that the Toxics Cleanup Program is coordinating with the greater Ecology team to address some environmental justice concerns we brought up in our Independent Metals 2 comment letter from November 16, 2022, we believe it is important to reiterate how crucial public involvement is in environmental justice communities and how all Ecology documents must consider environmental justice implications in order to better serve our communities and comply with the HEAL Act. We believe that an Enhanced Community Engagement Process needs to be developed for all environmental justice communities to meaningfully accomplish the HEAL Act. This letter addresses some issues that concern us about both the North Boeing Field Georgetown Steam Plant public meeting and document, but we believe that it has relevance to all MTCA documents released for public comment and all public meetings in environmental justice communities. [...]

Response Section 2

Thank you for providing the context of this North Boeing Field Georgetown Steam Plant comment in consideration of your Independent Metals Plant 2 comment. To access the Independent Metals Plant 2 Response to Comments, please visit:

<https://apps.ecology.wa.gov/cleanupsearch/site/12300>

To learn more about Ecology's progress on implementing the HEAL Act visit

<https://ecology.wa.gov/About-us/Who-we-are/Environmental-Justice/HEAL> and read the attached report in **Appendix B** "Implementing Washington's Environmental Justice Law (Chapter 70A.02 RCW); Summary of Progress and Implementation Goals."

Comment Section 3

- I. ECOLOGY SHOULD DEVELOP COMMUNITY ENGAGEMENT STRATEGIES WHEN SAFETY MECHANISMS ARE DEVELOPED.

When Ecology creates strategies related to community safety, there should be an opportunity for community input. In an overburdened community like Georgetown that is in close proximity to significant forms of air pollution such as industries, airports and highways, changes in traffic have greater impacts than it would in other parts of the city. Soil storage could also have similarly greater impacts in a community like Georgetown, whose residents are also facing the health consequences of living near so many contaminated areas.

Community members could offer valuable information related to site security and traffic control and should be informed about whether different options are being considered. Plans for traffic, dust and noise control, and transport of excavated soil will have a direct impact on community safety and Ecology should develop a way to engage communities, particularly environmental justice communities, on these aspects of work plans. [...]

Response Section 3

Thank you as well for this comment regarding community safety during a cleanup.

The community is always welcome to provide input through our public comment periods and express any concerns of safety with regards to the site cleanup.

Section 4 of the interim action work plan addresses how the construction phase of the project will deal with traffic, dust, and noise control. As part of the contractor's scope of work for the project, the contractor will develop a detailed site security and traffic control plan. The interim action work plan provides the initial details that must be included in the contractor's plan, including traffic control to maintain safe passage for pedestrians, bikes, and vehicles; a truck haul route that prioritizes hauling on arterial streets and limits impacts to the residential neighborhood; and gates and fencing for the construction area. For dust, engineering controls such as wetting soil, covering exposed soil, and street sweeping will be used during construction to limit the amount of dust generated. These practices will be employed to meet Puget Sound Clean Air Agency requirements. For noise control, work will only be performed during City of Seattle allowed hours to minimize disruption to the neighborhood.

Ecology will work with the City of Seattle, and other local and regional agencies, to provide any needed community safety notices.

Comment Section 4

II. ECOLOGY SHOULD ACKNOWLEDGE CUMULATIVE HEALTH IMPACTS IN ALL MTCA DOCUMENTS IN ENVIRONMENTAL JUSTICE COMMUNITIES.

It is incredibly important for Ecology to be considering the unique needs of an environmental justice community at all stages of cleanup. This consideration should then be reflected in all planning documents used for the site. One way for Ecology to recognize the unique needs of environmental justice communities like Georgetown is to acknowledge that these communities are exposed to multiple contaminants throughout their community, which creates additive risks. Acknowledging this will validate the lived experience of community members and show the ways that Ecology is factoring in the ways that a cleanup like the one at the North Boeing Field Georgetown Steam Plant should be more restrictive than cleanups in more affluent areas of Seattle. [...]

Response Section 4

Thank you for your feedback regarding the cumulative health impacts in the Georgetown community.

Ecology acknowledges that the Georgetown community, and the Duwamish's environmental justice community overall, is burdened with the cumulative health impacts of contamination being present in your community.

The goal of Washington State's Model Toxics Control Act (MTCA) is to "[...] accomplish effective and expeditious cleanups in a manner that protects human health and the environment. [...]" The aim of the MTCA cleanup process is to lessen those cumulative health impacts for all Washington State communities. To learn more about MTCA visit <http://www.ecology.wa.gov/mtca>.

Integration of cumulative health impacts throughout Ecology's cleanup documents will be a part of the implementation of the Health Environment for All (HEAL) Act.

To learn more about Ecology's progress on implementing the HEAL Act visit <https://ecology.wa.gov/About-us/Who-we-are/Environmental-Justice/HEAL> and read the attached report in **Appendix B** "Implementing Washington's Environmental Justice Law (Chapter 70A.02 RCW); Summary of Progress and Implementation Goals."

Comment Section 5

III. ECOLOGY SHOULD INCLUDE SUBSTANTIVE REVIEWS OF TECHNICAL DOCUMENTS AT PUBLIC MEETINGS.

Finally, Ecology should also conduct a more substantive explanation of the documents in these presentations. The majority of the public does not have the time to review them, and many of them are lengthy and technical. While an overview of the MTCA process is helpful, it can become repetitive when similar content is being shared at different public meetings for

different sites. Many of the documents that Ecology asks for public comment on are extremely long and difficult to understand. For example, for this particular site, the Interim Action Work Plan was 677 pages with technical maps, tables, and appendices that make this document inaccessible to the vast majority of the general public.

Combined with the aforementioned burden of having multiple public comment sites ongoing in the Duwamish Valley, Ecology should do a better job of taking more ownership of their role in creating an equitable process by presenting on the content of the documents they are seeking comment on. This would bring more people into the process who previously lacked the time and resources to do their own review and help remedy the power balance that exists between a state agency and an overburdened community. [...]

Response Section 5

Thank you for your input on the type of information that is useful in a public meeting. We will consider this comment when preparing for upcoming public comment periods.

As you noted in your comments, this work plan with appendices is very long. Without the appendices, the work plan is a total of 68 pages long (40 pages of text, 28 pages of figures and tables). The reason for providing the appendices is transparency – the appendices provide the backup for the information in the main text, such as providing copies of the analytical laboratory reports. However, the appendices are not necessary to review to understand the primary document. With regards to providing a separate document that is a substantive review of the original, Ecology is committed to making several changes for Lower Duwamish Waterway (LDW) sites that will help the public review these technical documents:

- For public comment periods, particularly those with lengthy primary documents, Ecology will strive to upload the main document separately from the appendices, and link to the main document only instead of the full-length document with appendices. The whole document will still be available via the website but separated for easier reviewing. This will allow the public to view the most important sections first, and focus their review on a smaller, more manageable sized document.
- For documents that generally include an Executive Summary (such as a remedial investigation), in addition to the separate document uploading, Ecology will separately upload and link to the Executive Summary to provide a shorter version of the longer document. This document serves as a general summary of the document, but provides more detail than a fact sheet.

Comment Section 6

IV. ECOLOGY SHOULD DEVELOP ENHANCED COMMUNITY ENGAGEMENT PRACTICES.

When there are several sites to be commented on in a single community, an Enhanced Community Engagement Process should be implemented. One component of this should include a way to combine multiple sites so that community members do not need to attend several different meetings that repeat the same general information about the MTCA process.

Then, there should be time in the combined meeting to go over the documents that are being reviewed for public comment. This could be done with breakout sessions.

As a part of an Enhanced Community Engagement Process, Ecology should also invite local community organizations to co-present. This would raise attendance and let people present who have a standing relationship with the community and experience communicating technical information to the general public. Community organizations could also talk about how to do public comment at these meetings. Many groups have insight into what could make the public comment more accessible, and what information community needs to be able to feel more comfortable participating in these processes. Having a review of this information at Ecology meetings would serve as a helpful way to remind people about what they should include in their comment and how to navigate the site to submit their comment. This will be particularly useful in environmental justice communities where many people do not speak English as their primary language.

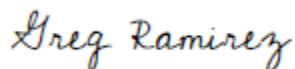
The Washington Department of Ecology should also provide opportunities for local community based organizations to review presentations beforehand to make content suggestions. This could give Ecology a better understanding of what community is interested in learning about and what topics would use editing for clarity.

In summary, we believe that the Department of Ecology should (1) develop community engagement strategies when safety mechanisms are developed, (2) acknowledge cumulative health impacts in all MTCA documents in environmental justice communities, (3) include substantive review of technical documents at public meetings, and (4) develop enhanced community engagement practices.

We appreciate this opportunity to provide comments. Please do not hesitate to contact us if you have any questions.



Jamie Hearn
Superfund Program Manager
Duwamish River Community
Coalition



Greg Ramirez
Board Chair
Georgetown Community Council

Response Section 6

Thank you for your input regarding public meetings and presentations.

Ecology will explore the appropriate event for combining multiple LDW sites. Ecology's best practice for scheduling LDW site comment periods is to avoid scheduling overlapping comment periods, while still considering construction schedules. This avoidance of overlapping comment period schedules would then remove the ability to combine sites for public meetings.

However, we will consider combining updates for multiple sites during other outreach events like open houses. Events like open houses would also be a good opportunity to integrate other community organizations for additional education like how to submit public comments, as you suggested.

Thank you for your presentation review comment. Ecology makes our presentations available as soon as we are able. Organizations are welcome to review and submit comments or reach out to Ecology to pass along feedback before the public meeting so that our presentation team is better prepared to answer questions. Our presentations will focus on site information and the review documents to fulfill MTCA's public participation requirements, but the community is welcome to ask other questions after we address the site-specific questions.

Comment from: Rosario-Maria Medina (Georgetown Open Space Committee)

Dear Julia Schwarz, Department of Ecology State of Washington,

Thank you for providing this opportunity for the community to give opinions and thoughts about cleanup site North Boeing Field Georgetown Steam Plant, Seattle also known as the Georgetown Flume and Off Leash Area. Located east of 1001 S. Myrtle St between Myrtle St and East Marginal Way.

We commend Ecology for making great efforts in engaging the community and providing notice to the Georgetown Open Space Committee in early September about the Flume Comment period occurring from November 7th to December 21st, joining the Georgetown Open Space Meeting Committee meeting on the 24th of October and for hosting a virtual meeting on November 9th to explain the process and answer community concerns and questions.

Based on the Ecology Interim Action plan 11/23 soil samples showed PCBs were not found but 48%, over half found were detected positive for PCBs. 4/40 tests showed cPAHs were undetected, 10%. Declaring 90% of the samples did find cPAHs. When it comes to the many toxins found, we as an environmental justice community find it unclear and inconsistent that these compounds have not been systematically studied as we get conflicting information. Leaving an unknown risk and exposure level. Risks that the public do not know how to calculate.

As Parks and public areas are required to be cleaned thoroughly and at the highest level as a residence, we ask Ecology to go above and beyond those set standards. Many of these toxins combined are very dangerous to the public.

We encourage Ecology and Seattle City Light to ensure the contaminants are cleaned up for the safety of people and pets. We agree with Ecology's action plans to remove the contaminants that are on the top soil.

Moving forward, we hope Ecology can implement a standard on site public notice for all toxic and cleanup sites by installing large notice signs. On site notice with MTCA # and risk rating (1 to 5) would be helpful. This will limit exposure.

We understand none of the MTCA sites are marked with signage and that it's not required. We hope this can change by spreading awareness and education.

Many people were unaware the North Boeing Field Georgetown Steam Plant/ Georgetown Flume and Off Leash Area had PCBs and cPAHS below the top layer.

We understand Ecology has a process of notifying the public through media releases, website and listserves and other community engagement notice tactics but people are unaware when they step foot on a site filled with toxic chemicals and are unaware they are being exposed.

Thank you again for engaging with our community and allowing us to provide feedback.

The Georgetown Open Space Committee

Georgetownopenspace@gmail.com

Response

Thank you for providing your comments on the Georgetown Flume dog park interim action.

PCBs and cPAHs are currently present in soil at the dog park interim action area, and will be removed as part of this interim action. The interim action screening levels are used for making a decision about what soil must be removed from the project area. These interim action screening levels for PCBs and cPAHs are set at the MTCA Method B cleanup levels for direct contact, which accounts for direct contact of humans and terrestrial ecological acceptors/wildlife to the soil and no restrictions on the use of the land (unrestricted land use). Unrestricted is the most protective land use that is used to calculate cleanup levels under the Model Toxics Control Act, and these levels are based on our best understanding of the science and risks of these chemicals known at this time. These cleanup levels also consider the cumulative effect of having multiple contaminants at the property, including PCBs, cPAHs, and arsenic. Soil concentrations that remain in the dog park area after this interim action will be below these levels, and should not pose an unacceptable risk to users of the park. As you noted in your comment, the top 1-2 feet of soil will be removed and replaced with clean soil.

For the dog park site, there is currently a sign at the edge of the park that explains the proposed project. As of now, it is not a requirement under MTCA that all sites be marked with signage, though it is something that we can consider for future rule revisions. We can also encourage property owners to voluntarily increase signage, especially for public entities or easily accessible properties such as rights-of-way or properties that are publicly owned.

Comment from: Anonymous

I'm a resident of South Park. I understand that Ecology plans to turn some of the steam plant area into a dog park and pedestrian path. My biggest concern with this would be the presence of toxic chemicals. The area does have a past history with the EPA cleaning up the river and not doing what they said they would. So it makes me dubious that the steam plant area where the flume is to be cleaned up to safe standards for the public to be around. PCB's and CPAH's are dangerous to the public and Ecology can't cut corners when it comes to cleaning of toxins.

Response

Thank you for your comment and your concern regarding the PCBs and cPAHs at the dog park and pedestrian pathway. The interim action screening levels for the dog park interim action area for PCBs and cPAHs are set at the MTCA Method B cleanup levels for direct contact, which accounts for direct contact of humans and terrestrial ecological acceptors/wildlife to the soil and no restrictions on the use of the land. It also considers cumulative effects from the contaminants at the property. Soil concentrations that remain in the dog park area after this interim action will be below these levels. Additionally, the 1-2 feet of fill will be clean, imported soil. This cleanup will be conducted as an interim action under the existing agreed order, so Ecology will be able to confirm that the PLP cleans up the area soils to the interim action screening levels.

We appreciate your concerns about making sure the area is cleaned up to safe standards.

Appendices

Appendix A. Public comments in original format

Appendix B. “Implementing Washington’s Environmental Just Law (Chapter 70A.02 RCW)
Summary of Progress and Implementation Goals”

Appendix A. Public comments in original format

**Appendix B. “Implementing Washington’s Environmental Just Law (Chapter 70A.02 RCW)
Summary of Progress and Implementation Goals”**