

Response to Comments

Remedial investigation

South Park Marina cleanup site Seattle, WA

Toxics Cleanup Program

Washington State Department of Ecology

Northwest Regional Office

Shoreline, Washington

September 2026

DEPARTMENT OF ECOLOGY
State of Washington

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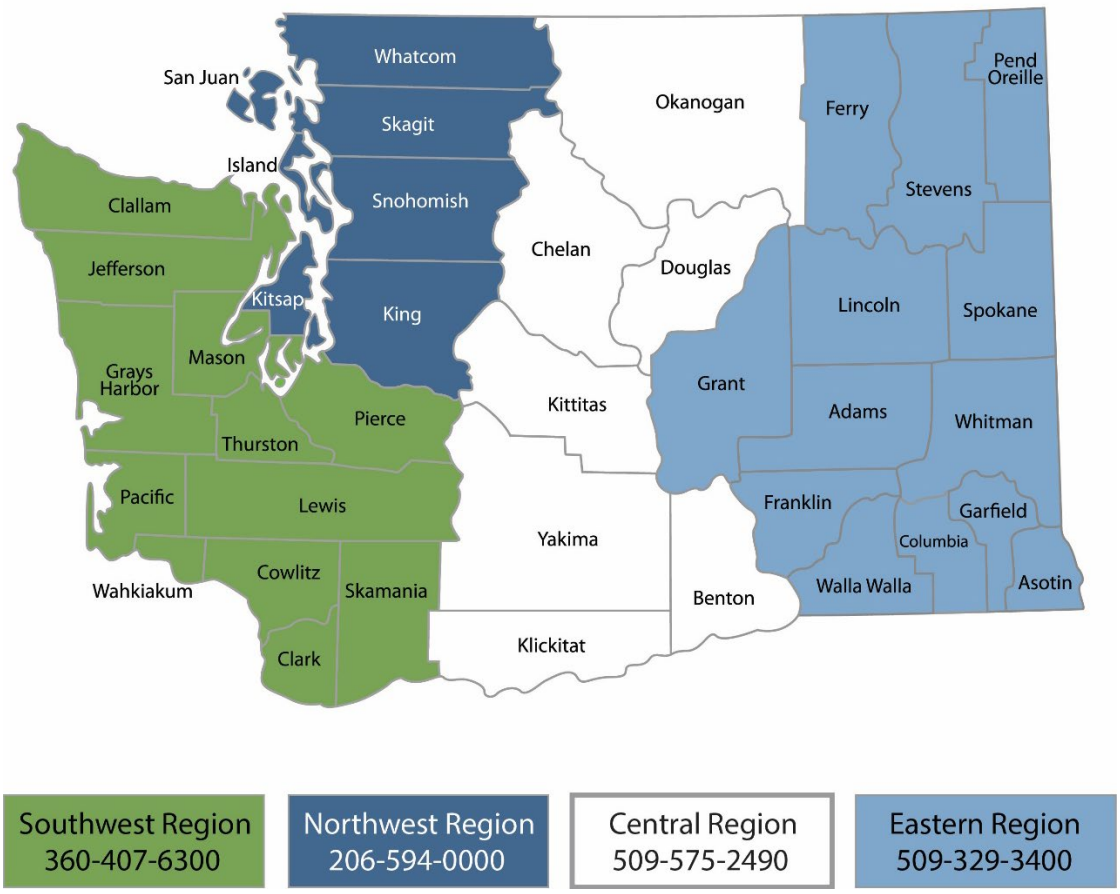
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[1] www.ecology.wa.gov/contact

Department of Ecology's region offices

Map of counties served



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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Table of contents

List of figures and tables **5**

Figures 5

Tables 5

Public outreach summary **6**

Comment summary **7**

Next steps **7**

Minor changes made 7

Next steps 7

Comments and responses **9**

Comment from: Suquamish Tribe 9

Comment from: Duwamish River Community Coalition 10

Appendices **14**

List of figures and tables

Figures

Figure 1 Washington's formal cleanup process..... 8

Tables

Table 1: List of Commenters 7

Public outreach summary

The South Park Marina site located in Seattle is continuing Washington State's formal cleanup process[2] as directed under the Model Toxics Control Act (MTCA[3]). The City of Seattle, Port of Seattle, and South Park Marina Limited Partnership are addressing contamination at the site under a legal agreement with Ecology.

The Department of Ecology's public involvement activities related to this Site's 45-day comment period (March 9 – April 22, 2026) included:

- **Fact sheet:**
  - US mail distribution of a fact sheet providing information about the cleanup documents, the public comment period to approximately 3009 addresses including neighboring businesses and other interested parties.
  - Email distribution of the postcard and a fact sheet to 158 people, including interested individuals, local/county/state/federal agencies, neighborhood associations, and interested community groups.
  - The fact sheet was available digitally through Ecology's cleanup site webpage[4].
- **Legal notices:**
  - Publication of one paid display ad in *Seattle Times,* dated Friday, March 6, 2026
- **Site register:**
  - Publication of 4 notices in our Toxics Cleanup Site Register:
    - Comment period notice:
      - March 5, 2026
      - March 19, 2026
      - April 2, 2026
      - April 16, 2026
    - Response summary notice:
      - September 17, 2026
    - Visit our Site Register website[5] to download PDFs.
- **Websites**:
  - We announced the public comment period, posted the fact sheet and postcard, and made the review documents available on our South Park Marina webpage[6] and our Public Inputs & Events webpage[7].
- **Document repositories:**
  - Documents were available at the Seattle Public Library – South Park Branch and at our Northwest Region Office.

[2] https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process
[3] https://ecology.wa.gov/mtca
[4] https://apps.ecology.wa.gov/cleanupsearch/site/2858
[5]https://apps.ecology.wa.gov/publications/UIPages/PublicationList.aspx?IndexTypeName=Program&NameValue=Toxics+Cleanup&DocumentTypeName=Newsletter
[6] https://apps.ecology.wa.gov/cleanupsearch/site/2858
[7] https://10ecology.wa.gov/Events/Search/Listing

- **Digital Newsletter:**
  - We announced the comment period using a video update attached to the Lower Duwamish Waterway monthly newsletter[8] in March 2026.

Comment summary

From March 9 – April 22, 2026, we solicited public comments on a remedial investigation for the South Park Marina cleanup site.

We received two comments during the 45-day comment period.

Table 1: List of commenters

	First name	Last name	Agency/Organization/Business	Submitted by
1	Shawn	Blocker	Suquamish Tribe	Email
2	Alexandra	Johnson	Duwamish River Community Coalition	Email
	C. Linn	Gould		

Next steps

Minor changes made

We have reviewed and considered the public comments received on the documents. Based on our evaluation of the comments, minor changes in wording were made to the remedial investigation report. These wording changes were made to clarify and address concerns expressed in the comments. You will be able to view the changes in Sections 2.4.1, 6.1.2, 6.2.2.1, 6.2.2.2, 8.2.4, 8.3, and Table 8.1 of the remedial investigation report. The report is being finalized and will be available on the site webpage as a final version in the near term.

Next steps

The next step is to finalize the signing of an amendment to the legal agreement, called an agreed order, which will require a study of cleanup options (feasibility study) and a draft cleanup action plan to be created. Once the amendment is signed, the feasibility study stage will begin. See graphic below and visit our cleanup process webpage[9] to learn more about Washington's formal cleanup process.

[8] https://public.govdelivery.com/accounts/WAECY/subscriber/new?topic_id=WAECY_37
[9] https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process
[15] https://apps.ecology.wa.gov/publications/SummaryPages/1909166.html

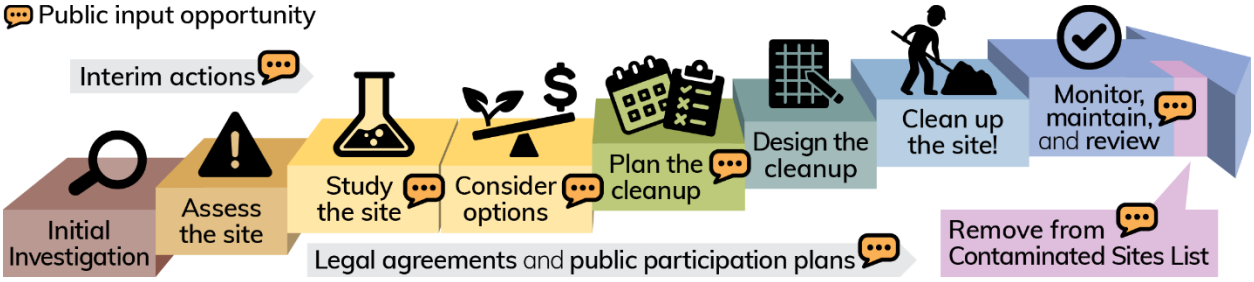


Figure 1 Washington's formal cleanup process.

Comments and responses

The public comments are presented below, along with our responses. Appendix A, page 14, contains the comments in their original format.

Comment from: Suquamish Tribe

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 *[preliminary cleanup levels]* must ensure the protection of tribal harvesters, consistent with the LDW ROD and supporting risk assessments.

Response: Sentences were added to Section 2.4.1 that acknowledge the LDW is a Usual and Accustomed harvest area for the Suquamish, Muckleshoot, and Yakama federally recognized tribal nations and that members of the Duwamish Tribal Organization and other fishers who may be members of vulnerable populations or overburdened communities also use the LDW. Information on subsistence consumption of seafood was added to Sections 6.1.2, 6.2.2.1, and 8.2.4.

The sediment cleanup levels for the LDW are based on the reasonable maximum exposure fish consumption rate (FCR) of 97.5 g/day, which was used in the LDW baseline human health risk assessment and is based on a study of the Tulalip Tribe. Ecology used EPA's sediment CULs where available and used the same FCR to establish sediment PCULs for chemicals not included in the LDW record of decision. This information was added to Sections 6.1.2 and 6.2.2.1.

The attached figures identify the property boundary of the site, but not the "Site Boundary". Modify either a current figure or create a new figure that identifies the site boundary as defined by MCTA.

Response: The nature and extent of contamination are discussed in detail by chemical class in Section 7. A summary of the nature and extent of contamination is included in Section 9 (Conclusions) and presented on Figure 9.1.

Section 6.2.2.2 - The applicability of using a Simplified Terrestrial Ecological Evaluation (TEE) per WAC 173-340-7490 is for determining whether a release of hazardous substances to soil may pose a threat to the terrestrial environment by characterizing threats to terrestrial plants or animals exposed to hazardous substances in soil, and establishing site-specific cleanup standards for the protection of terrestrial plants and animals. This form of a TEE is not appropriate for protection of sediments, which is one of the main drivers for remediating this site. 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.

Response: Section 6.2.2.2 was edited for clarity. The discussion of transport and exposure pathways included in the soil screening levels was placed before the discussion of the TEE. Soil screening levels protect sediment through both leaching and erosion.

Section 8 – Current or future land use (including current physical structures) should not be utilized as a basis within a RI for elimination of PCOC's *[potential chemicals of concern]*; that is a discussion and evaluation that should take place in the FS.

Also, would recommend using "pathways are not currently complete" vice "incomplete".

Though mentioned, evaluation of soil to groundwater to sediment exposure pathways are not discussed in the soil evaluation sections.

Response: No COPCs were eliminated based on current or future land use, as the screening/cleanup levels considered unrestricted land use (as noted in Section 6.2.2.2). Section 8 describes what exposure pathways may or may not be complete for COPCs based on current and potential future land use.

Table 8.1 distinguishes between pathways that are incomplete and those that are currently incomplete but potentially complete in the future. Multiple bullets in Section 8 discuss potential future conditions. Text throughout Section 8 was edited to clarify the distinction.

Sections 8.3.4, 8.4.3, and 8.5.3 discuss the pathway from soil to groundwater to sediment. The screening levels for protection of sediment (SL-7) are higher (less stringent) than the screening levels for protection of surface water (SL-6) for many chemicals, so they aren't listed as the sources of the screening levels in Tables 6.3 and 6.4. Soil screening levels for two chemicals in Table 6.3 and 15 chemicals in Table 6.4 are based on the soil to groundwater to sediment pathway.

Conclusions (and supporting appendices). Adjust the Conclusions section to address the above comments.

Response: Based on the responses to comments above, no edits were made to the Conclusions section.

Comment from: Duwamish River Community Coalition

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.

Response: Sentences were added to Section 2.4.1 that acknowledge the LDW is a Usual and Accustomed harvest area for the Suquamish, Muckleshoot, and Yakama federally recognized tribal nations and that members of the Duwamish Tribal Organization and other fishers who may be members of vulnerable populations or overburdened communities also use the LDW.

Information on subsistence consumption of seafood was added to Sections 6.1.2, 6.2.2.1, and 8.2.4.

What is the full contamination boundary? Does it extend into the federal navigation channel, or through groundwater movement north or south of the site? Even though the former T117 (People's Park) is located upgradient of the bulk of SPM contamination, do we have evidence that T-117 has stayed "clean"? What will the considerations be for the intertidal mudflat habitat?

Response: The nature and extent of contamination are discussed in detail by chemical class in Section 7. A summary of the nature and extent of contamination is included in Section 9 (Conclusions) and presented on Figure 9.1.

Groundwater flow from the SPM Property onto the Duwamish River People's Park is discussed in detail in Section 3.2.3.4. As discussed in the 2022 Site source control evaluation, we do not expect impacts to the sediment environment from SPM.

There is no indication that recontamination has occurred on the Duwamish River People's Park (former T-117). There have been several post-cleanup monitoring events at the Duwamish River People's Park that indicate the cleanup is still effective:

- Annual visual inspection of the marina corner area since 2018. No sheen observed in the seeps in this area and no indication that the remedy in this area is failing.
- Four rounds of post-cleanup construction sediment sampling (2019, 2021, 2023, 2025). None of the sample results within the Early Action Area (EAA) exceed the LDW remedial action levels (RALs).
- Four rounds of post habitat construction sediment sampling (2022,2023, 2024, 2025). None of the sample results within the EAA exceed the LDW RALs.
- A portion of the T-117 EAA overlaps with LDW Sediment Management Area (SMA) 12B where dredging was completed in 2026. Post-dredge surface sediment samples collected within and immediately adjacent to the T-117 EAA in 2026 were all below the LDW RAL for PCBs.

We would like to ensure that you are aware that several people reside full time on boats at the marina. We would like to ensure that you have accurately assessed their exposure with regard to both living on the boats as well as access on and off the site.

Response: The Marina's policy is to not allow for people to live on vessels full time. Occasional exceptions are made for short durations and special circumstances. There are residential structures on the SPM Property, but with limited occupancy, as discussed in Section 2.3. Those structures are shown on Figure 2.1. Regardless, the RI used residential soil screening levels (unrestricted land use) for people contacting soil. However, other transport and exposure

pathways yielded lower (more stringent) screening levels for almost every chemical. Sediment screening levels considered beach play and human consumption of seafood. We believe the screening levels are protective for residents at the marina.

How will the cleanup coordinate with boat residents and provide the necessary considerations? Will residents be removed from the site? Please provide a residential map of the adjacent properties along Dallas Ave S from 14th-17th Ave S, as well as an accounting of all residents living or working on boats in the Marina.

Response: Thank you for informing us of these concerns. They will be addressed in the FS, which will include a figure showing nearby residences.

We request that you coordinate with the City of Seattle to ensure that mixed use zoning is preserved for Dallas Ave S, reflecting the reality of long-time neighbors living across the street and maintaining the public access and recreational opportunities that the Marina site brings to South Park residents (see photo below). We understand that the FS alternatives will clean up to residential levels of PCBs and other contaminants of concern to comply with state laws.

Response: Thank you for informing us of these concerns. The government agency with jurisdiction over the SPM property is King County. Ecology does not have a role in local land use planning and zoning, but we must consider future land use plans during remedy selection. The FS is required to consider an alternative that cleans up all contamination to unrestricted (residential) land use cleanup levels. The FS will also consider less stringent remedies that might include remediation levels and conditional points of compliance. The community's interest in future land use must be considered during remedy selection in the FS.

Since you are unable to contact the former owners and address PCE at the source, we would like to have a clear understanding of how you will address the treatment of the upgradient PCE and other volatile constituents entering the site in the FS. Will there be a cleanup alternative that addresses cleanup at the upgradient property line? This is particularly important for a future land use that allows for residential housing and a maritime academy.

Response: Thank you for informing us of potential future land uses of interest to the community. These will be considered in the feasibility study. Ecology is continuing our attempts to work with the upgradient property owner. Alternatives to clean up the upgradient property and the resulting plume will be considered as part of the remedial investigation/feasibility study process for the upgradient site. The feasibility study for the SPM site will consider management of the upgradient plume. Attorneys for Ecology and the potentially liable parties for SPM are currently discussing legal options for managing the upgradient plume. This issue will be addressed in the feasibility study.

What concerns does Ecology have about contaminants migrating offsite? Do we need any studies that will be coordinated before or during feasibility study drafting?

Response: See the response to comment 2. We believe no additional studies are needed beyond those discussed in the response to comment 2.

We appreciate the fact that the RI addressed climate change in its document but its three paragraphs feel scanty given that there was a significant river overtopping and combined sewer overflow event in December 2022. Sewage from the overtopping entered people's homes and it is unknown how contamination in ground water from adjacent contaminated waste sites was distributed. We do not believe the projections cited in the RI are accurate. We also do not believe that the RI has appropriately addressed contamination issues at the site in light of this event.

We have consistently discussed our concerns about sea level rise and flooding in South Park and have not been happy with the types of engineered solutions that have been consistently proposed up and down the River. We are very interested in hearing about cleanup alternatives that consider nature-based solutions to accommodate SLR [sea level rise] and flooding (consider the University of Washington and DRCC Living with Water Report; 2026).

Response: We appreciate your concerns regarding the area-wide flooding that occurred in December 2022 and the effects that had on the neighborhood. No flooding was reported for the SPM Property. Additionally, groundwater data was collected for the RI after the December 2022 flooding event, and therefore the dataset is representative of post-flood conditions. We do not believe the flooding event caused any significant migration of contamination associated with the Site.

Thank you for sharing your interest in nature-based solutions for flooding. We welcome comments on sea level rise and engineered solutions as part of the feasibility study, which must consider such community interests. There will be additional discussions of the identified climate change impacts in this area and how it may affect specific proposed remedies in the feasibility study.

Appendices

Appendix A. Public comments in original format

Suquamish Tribal Comments on the South Park Marina 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. The attached figures identify the property boundary of the site, but not the "Site Boundary". Modify either a current figure or create a new figure that identifies the site boundary as defined by MCTA.

3. Section 6.2.2.2 - The applicability of using a Simplified Terrestrial Ecological Evaluation (TEE) per WAC 173-340-7490 is for determining whether a release of hazardous substances to soil may pose a threat to the terrestrial environment by characterizing threats to terrestrial plants or animals exposed to hazardous substances in soil, and establishing site-specific cleanup standards for the protection of terrestrial plants and animals. This form of a TEE is not appropriate for protection of sediments, which is one of the main drivers for remediating this site. 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.

4. Section 8 – Current or future land use (including current physical structures) 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. Also, would recommend using "*pathways are not currently complete*" vice "*incomplete*". Though mentioned, evaluation of soil to groundwater to sediment exposure pathways are not discussed in the soil evaluation sections.

5. Conclusions (and supporting appendices). Adjust the Conclusions section to address the above comments.

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: South Park Marina Site Public Comment
On behalf of: the Duwamish River Community Coalition (DRCC)

Dear Department of Ecology,

Thank you for creating this Draft Remedial Investigation (RI). 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 these cleanup efforts are just the beginning of the myriad reparations required to heal our lands and waters. The River continues to impact the community: In December, 2022, South Park was severely impacted by the river overtopping and simultaneous release of combined sewer overflow waters into several residents homes due to a climate change related event.

When viewing the South Park Marina draft RI through this lens, we offer the following comments:

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.

Full Containment Boundary
What is the full contamination boundary? Does it extend into the federal navigation channel, or through groundwater movement north or south of the site? Even though the former T117 (People's Park) is located upgradient of the bulk of SPM contamination, do we have evidence that T-117 has stayed "clean"? What will the considerations be for the intertidal mudflat habitat?

Conceptual Site Model
We would like to ensure that you are aware that several people reside full time on boats at the marina. We would like to ensure that you have accurately assessed their exposure with regard to both living on the boats as well as access on and off the site.

Cleanup Considerations
<u>Boat residents</u>
How will the cleanup coordinate with boat residents and provide the necessary considerations? Will residents be removed from the site? Please provide a residential map of the adjacent properties along Dallas Ave S from 14th-17th Ave S, as well as an accounting of all residents living or working on boats in the Marina.

<u>Future land use and zoning</u>
We request that you coordinate with the City of Seattle to ensure that mixed use zoning is preserved for Dallas Ave S, reflecting the reality of long-time neighbors living across the street and maintaining the public access and recreational opportunities that the Marina site brings to South Park residents (see photo below). We understand that the FS alternatives will clean up to residential levels of PCBs and other contaminants of concern to comply with state laws.

<u>PCE cleanup</u>
Since you are unable to contact the former owners and address PCE at the source, we would like to have a clear understanding of how you will address the treatment of the upgradient PCE and other volatile constituents entering the site in the FS. Will there be a cleanup alternative that

addresses cleanup at the upgradient property line? This is particularly important for a future land use that allows for residential housing and a maritime academy.



Credit: [Google Maps]

Empirical demonstrations:

What concerns does Ecology have about contaminants migrating offsite? Do we need any studies that will be coordinated before or during feasibility study drafting?

Sea level rise and flooding in South Park

We appreciate the fact that the RI addressed climate change in its document but its three paragraphs feel scanty given that there was a significant river overtopping and combined sewer overflow event in December, 2022. Sewage from the overtopping entered people's homes and it is unknown how contamination in ground water from adjacent contaminated waste sites was distributed. We do not believe the projections cited in the RI are accurate. We also do not

believe that the RI has appropriately addressed contamination issues at the site in light of this event.

We have consistently discussed our concerns about sea level rise and flooding in South Park and have not been happy with the types of engineered solutions that have been consistently proposed up and down the River. We are very interested in hearing about cleanup alternatives that consider nature-based solutions to accommodate SLR and flooding (consider the University of Washington and DRCC *Living with Water* Report; 2026).

Thank you for considering our comments. It is no accident that the history of polluting the Duwamish Valley has led to this concentration of contaminated waste sites in close proximity to residents and neighbors. Our environmental justice community is highly sensitive to the cumulative impacts of multiple stressors. We strongly advocate for the highest level of cleanup possible to remediate past inequities, amplify equity, and improve community health.

Sincerely,





Alexandra Johnson (she/her)
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