



DEPARTMENT OF
ECOLOGY
State of Washington

Public Participation Plan

701 Dexter Site

701 Dexter Avenue North, Seattle WA.

Facility Site ID: 78082

Cleanup Site ID: 15112

September 2020

Publication and Contact Information

This plan is available on the Department of Ecology's website at:
[Ecology's 701 Dexter Webpage](#)

For more information contact:

Northwest Regional Office
3190 160th Ave SE
Bellevue, WA 98008

Washington State Department of Ecology – [Department of Ecology Homepage](#)

- Headquarters, Olympia 360-407-6000
- Northwest Regional Office, Bellevue 425-649-7000
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Public Participation Plan

701 Dexter Site

Toxics Cleanup Program
Northwest Region
Washington State Department of Ecology
Bellevue, Washington

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Public Involvement in Contamination Cleanup

The Washington State Department of Ecology (Ecology) developed this public participation plan (plan) in cooperation with ARE-Seattle 33 LLC (ARE), the party responsible for cleanup at the 701 Dexter Site (Site). The purpose of the plan is to promote meaningful community involvement during cleanup.

The plan describes ways Ecology will inform the public about contamination investigations and cleanup options throughout the cleanup process. Ecology encourages the public to learn about and get involved in decision-making opportunities. This plan identifies how and when the public can get involved during different stages of the investigation and cleanup of contamination.

This plan was developed for the Agreed Order for the 701 Dexter Site.

Site contacts

To be included in the site record, comments about the cleanup process must be submitted during comment periods. Questions and informal comments or information about the site's history are welcome anytime.

Ecology

Northwest Regional Office
3190 160th Ave SE
Bellevue WA 98008

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Potential Liable Parties (PLP)

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Seattle, WA 98109
cgunter@are.com
206.408.1550

Public Participation Grants

Grants may be available to neighborhood committees, non-profits, and other groups interested in the site. For contaminated sites, these funds can be used to:

- Hire an expert to help interpret technical information¹
- Conduct activities that enhance the public's understanding of, and participation in, the cleanup process

For more information about public participation grants, please contact Lynn Gooding at 360-407-6062 or lynn.gooding@ecy.wa.gov, or visit the [Public Participation Grant website](#).²

Washington's Cleanup Laws

Ecology uses the Model Toxics Control Act (MTCA) and accompanying regulations for cleanup activities. This plan is required under MTCA, a law that passed in 1989. MTCA provides guidelines for contaminated site cleanup in Washington State and sets standards to ensure the cleanup protects human health and the environment.

Model Toxics Control Act (MTCA)

MTCA began as a grassroots citizen's initiative in 1988, and started the process of systematically cleaning up contaminated sites in Washington. Under MTCA, a current or past property owner or operator may be held responsible for cleaning up contamination on, or coming from, their property to standards that are safe for human health and the environment.

Ecology enacts MTCA and oversees cleanups in the state and issues regulations and guidance governing those cleanups. The regulations are found in [Chapter 173-340 Washington Administrative Code \(WAC\)](#).³ Ecology investigates reports of property contamination, and if the contamination is seen as a significant threat to human health or the environment, the contaminated property is placed on the Hazardous Sites List, and the cleanup process begins.

¹ Ecology currently does not have a citizen technical advisor for providing technical assistance to citizens on issues related to the investigation and cleanup of the site.

² ecology.wa.gov/About-us/How-we-operate/Grants-loans/Find-a-grant-or-loan/Public-participation-grants

³ <https://fortress.wa.gov/ecy/publications/publications/9406.pdf>

A public participation is an important part of cleanup under the MTCA process. Participation needs are assessed at each cleanup site according to the level of public interest and the degree of risk posed by the contamination. Individuals who live near the site, community groups, businesses, government, other organizations, and interested parties have the opportunity to get involved by commenting on the cleanup process. Under MTCA, the cleanup process generally includes five phases. Each phase includes an opportunity for the public to review and comment.

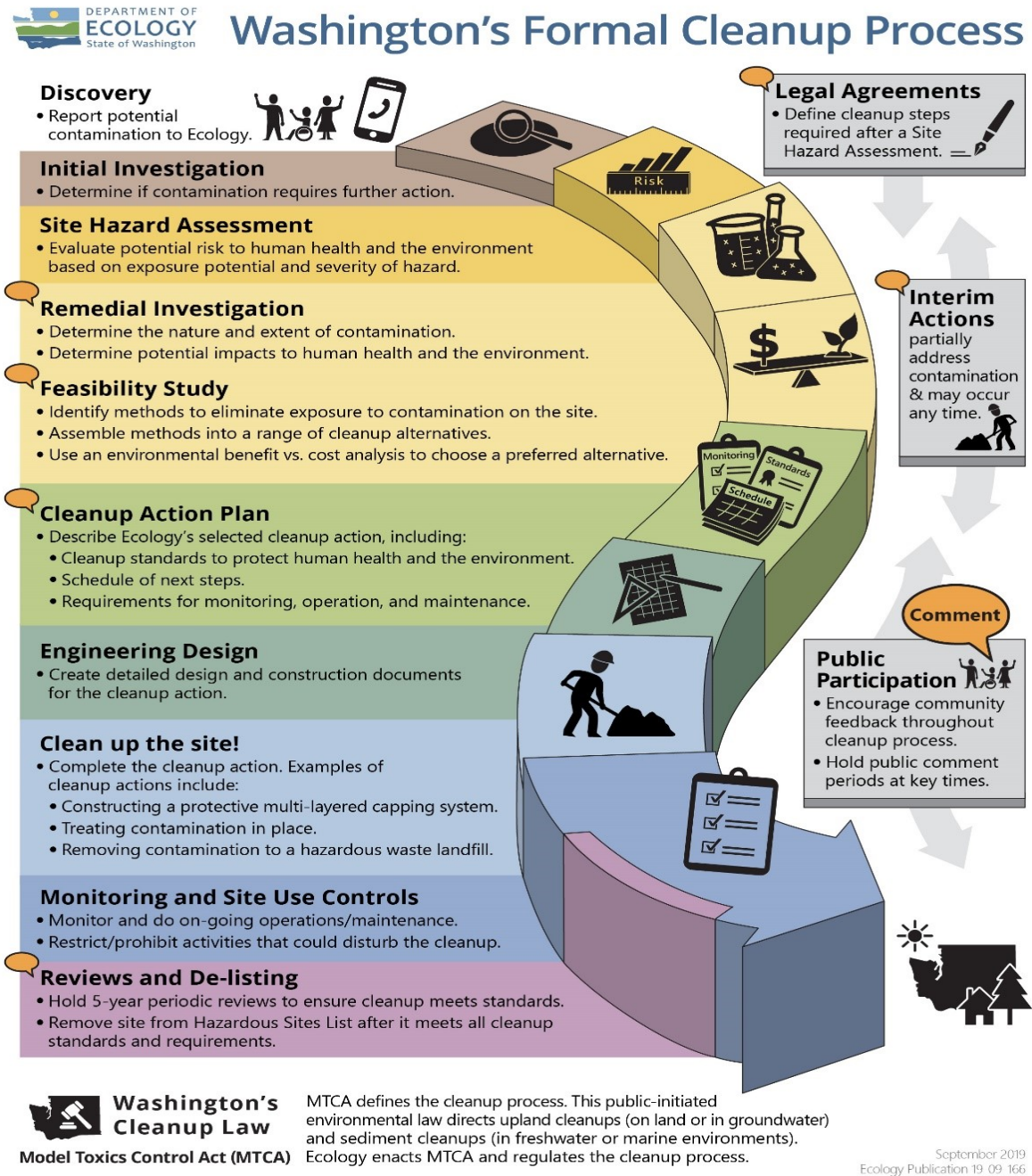


Figure 1. Steps in Washington's Cleanup Process

State Environmental Policy Act

The State Environmental Policy Act (SEPA) is followed during review and development of the cleanup action plan.

Site History

The 701 Dexter Site is generally located at 701 Dexter Avenue North in Seattle, a property of approximately 0.62 acres. The 701 Dexter property (Property) is bordered by Dexter Avenue, Roy Street, and Aurora Avenue. One 61,800 square foot building built in 1984 covers most of the Property. The current building has 2 commercial tenants, and includes six stories and two levels of above-ground parking.

Adjacent properties have historically been used for a variety of residential and commercial purposes, including an auto shop, industrial laundry facility, and gas stations. Currently there are large residential complexes, commercial businesses, and redevelopment activities occurring on adjacent properties.

The 701 Dexter property was originally developed with one single-family residence in 1893. Then from 1905 to at least 1925, two single-family and two multi-family residences were located there. From the 1930s to the 1980s, the Property was used as a restaurant with a large parking lot. Since 1984 when the current building was built, numerous commercial tenants have occupied it.

701 Dexter Property



Investigation & Contamination

Two Phase I Environmental Site Assessments have been done for the Site: one by Farallon Consulting in 2015, and one by Ramboll Corporation in 2018. The following contaminants have been detected in soil and groundwater:

- petroleum hydrocarbon constituents
- chromium
- chloroform

Additionally, volatile organic compounds (VOC's) have been detected in soil vapor.

Adjacent properties are known to have contamination in soil and groundwater. A chlorinated VOC groundwater contaminant plume has been identified to the east of the Property. However, while this contaminant plume has not been found to extend onto the 701 Dexter property, this could change conditions if groundwater flow is altered.



Cleanup plans

As of September 7, 2020 Ecology will conduct a 30-day public comment period on the Agreed Order and Public Participation Plan. The Agreed Order directs ARE to investigate environmental conditions, evaluate cleanup alternatives, conduct interim cleanup actions (if necessary), and develop a cleanup action plan for the Site.

Should any comments result in significant changes to these documents, revised versions will be available for review during a new comment period. If there are no public comments that require significant changes to the documents, then the documents will be signed, if applicable, and considered final. ARE will then move ahead with the cleanup process.

Community Profile

The Environmental Protection Agency (EPA) has developed a new environmental justice (EJ) mapping and screening tool called EJSCREEN. It is based on nationally consistent data and an approach that combines environmental and demographic indicators in maps and reports. Ecology uses this information to tailor its communications to the needs of particular communities, including: develop language translations, identify the need for interpreters, and generate other information for the community. Ecology translates materials like factsheets into languages that are spoken by 5 percent or more of the local community.

In this case the data indicate that Spanish is spoken by 7 percent of households, and Chinese by 15 percent. Therefore Ecology will be providing factsheets and community information in those languages. When public meetings are needed, or requested by 10 or more persons during a public comment period, Ecology will provide interpreter services in those languages.

701 Dexter Property & Seattle vicinity





EISCREEN Report (Version 2018)

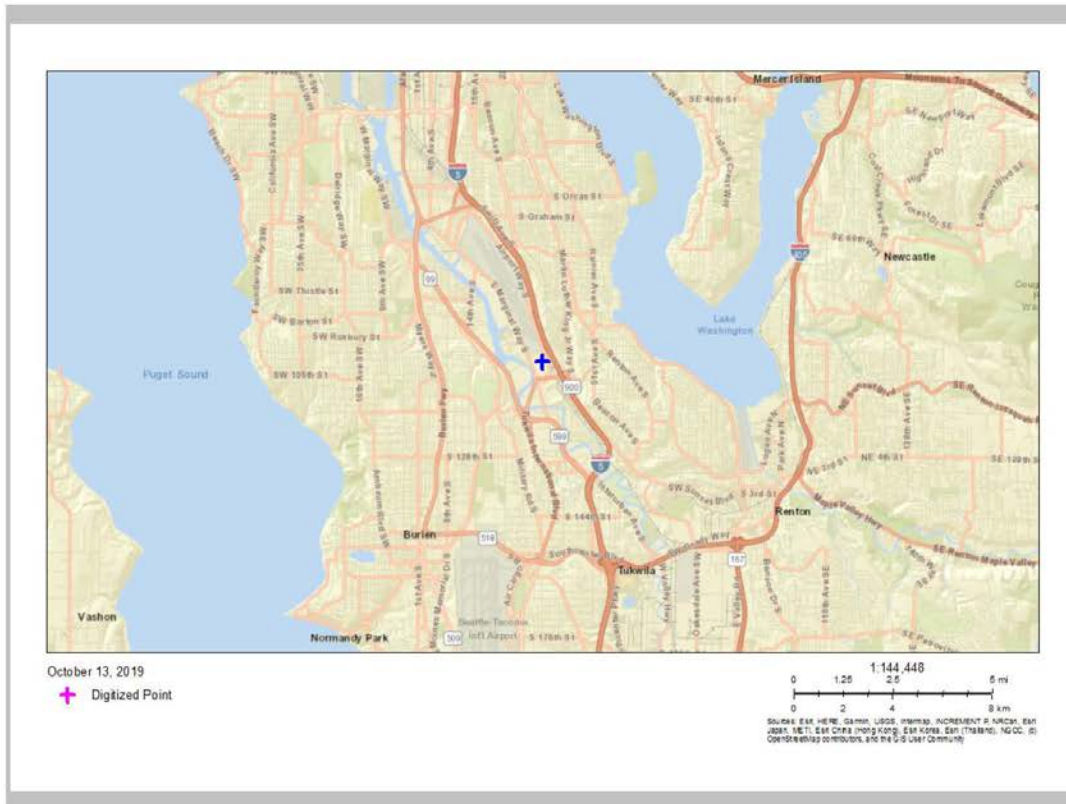


1 mile Ring Centered at 47.511387,-122.288747, WASHINGTON, EPA Region 10

Approximate Population: 5,870

Input Area (sq. miles): 3.14

Emerald Gateway



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	2



EJSCREEN Report (Version 2018)



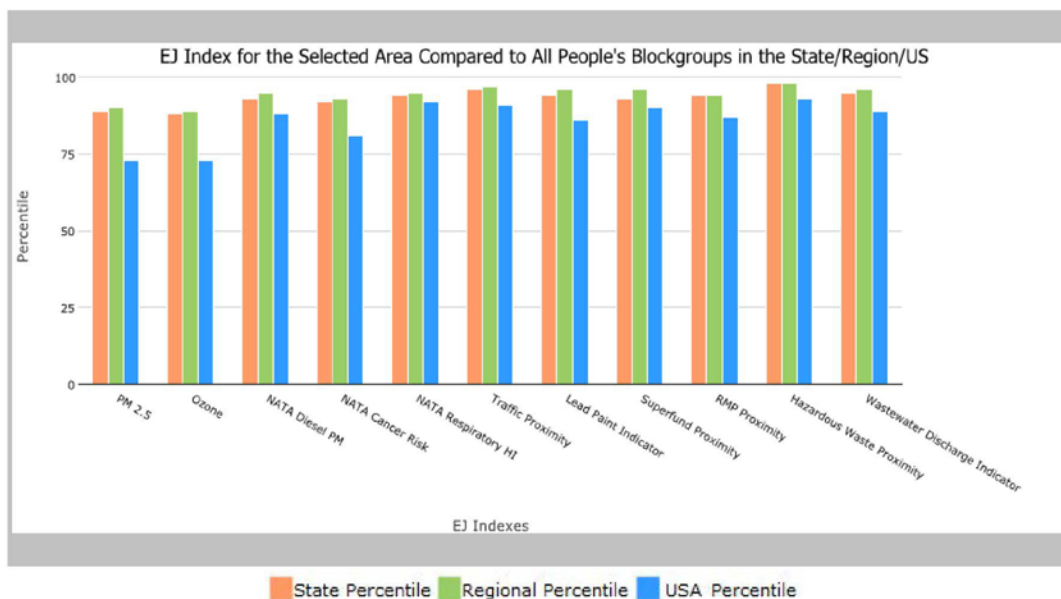
1 mile Ring Centered at 47.511387,-122.288747, WASHINGTON, EPA Region 10

Approximate Population: 5,870

Input Area (sq. miles): 3.14

Emerald Gateway

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	89	90	73
EJ Index for Ozone	88	89	73
EJ Index for NATA [*] Diesel PM	93	95	88
EJ Index for NATA [*] Air Toxics Cancer Risk	92	93	81
EJ Index for NATA [*] Respiratory Hazard Index	94	95	92
EJ Index for Traffic Proximity and Volume	96	97	91
EJ Index for Lead Paint Indicator	94	96	86
EJ Index for Superfund Proximity	93	96	90
EJ Index for RMP Proximity	94	94	87
EJ Index for Hazardous Waste Proximity	98	98	93
EJ Index for Wastewater Discharge Indicator	95	96	89



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

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EJSCREEN Report (Version 2018)



1 mile Ring Centered at 47.511387,-122.288747, WASHINGTON, EPA Region 10

Approximate Population: 5,870

Input Area (sq. miles): 3.14

Emerald Gateway

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	7.16	7.23	52	7.54	38	9.53	10
Ozone (ppb)	30.2	33.9	18	36.1	10	42.5	2
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	2.18	1.4	86	1.06	90-95th	0.938	90-95th
NATA* Cancer Risk (lifetime risk per million)	56	40	89	39	90-95th	40	90-95th
NATA* Respiratory Hazard Index	5.4	2.8	93	2.8	90-95th	1.8	95-100th
Traffic Proximity and Volume (daily traffic count/distance to road)	1300	450	91	380	93	600	90
Lead Paint Indicator (% Pre-1960 Housing)	0.5	0.23	83	0.23	85	0.29	76
Superfund Proximity (site count/km distance)	0.23	0.17	79	0.12	87	0.12	88
RMP Proximity (facility count/km distance)	1.5	0.61	87	0.63	87	0.72	85
Hazardous Waste Proximity (facility count/km distance)	8.6	1.9	95	1.5	97	4.3	94
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0042	0.062	87	0.038	87	30	76
Demographic Indicators							
Demographic Index	58%	29%	92	29%	93	36%	80
Minority Population	81%	30%	97	27%	97	38%	84
Low Income Population	36%	29%	68	32%	63	34%	59
Linguistically Isolated Population	11%	4%	88	3%	90	4%	84
Population With Less Than High School Education	19%	9%	87	10%	87	13%	76
Population Under 5 years of age	7%	6%	58	6%	58	6%	59
Population over 64 years of age	11%	14%	38	14%	36	14%	36

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

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EJSCREEN ACS Summary Report



Location: User-specified point center at 47.511387, -122.288747
 Ring (buffer): 1-mile radius
 Description: Emerald Gateway

Summary of ACS Estimates		2012 - 2016	
Population			5,870
Population Density (per sq. mile)			2,018
Minority Population			4,726
% Minority			81%
Households			1,982
Housing Units			2,085
Housing Units Built Before 1950			584
Per Capita Income			23,379
Land Area (sq. miles) (source: SF1)			2.91
% Land Area			94%
Water Area (sq. miles) (source: SF1)			0.19
% Water Area			6%

	2012 - 2016 ACS Estimates	Percent	MOE (±)
Population by Race			
Total	5,870	100%	618
Population Reporting One Race	5,130	87%	1,855
White	1,685	29%	499
Black	1,259	21%	323
American Indian	38	1%	117
Asian	1,512	26%	338
Pacific Islander	280	5%	210
Some Other Race	355	6%	368
Population Reporting Two or More Races	740	13%	393
Total Hispanic Population	1,079	18%	563
Total Non-Hispanic Population	4,791		
White Alone	1,143	19%	317
Black Alone	1,259	21%	323
American Indian Alone	35	1%	45
Non-Hispanic Asian Alone	1,512	26%	338
Pacific Islander Alone	280	5%	210
Other Race Alone	0	0%	12
Two or More Races Alone	562	10%	270
Population by Sex			
Male	2,987	51%	316
Female	2,882	49%	363
Population by Age			
Age 0-4	395	7%	207
Age 0-17	1,404	24%	241
Age 18+	4,466	76%	319
Age 65+	617	11%	94

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race. N/A means not available. Source: U.S. Census Bureau, American Community Survey (ACS) 2012 - 2016.



EJSCREEN ACS Summary Report



Location: User-specified point center at 47.511387, -122.288747
 Ring (buffer): 1-mile radius
 Description: Emerald Gateway

	2012 - 2016 ACS Estimates	Percent	MOE (±)
Population 25+ by Educational Attainment			
Total	3,932	100%	321
Less than 9th Grade	282	7%	111
9th - 12th Grade, No Diploma	473	12%	120
High School Graduate	1,286	33%	199
Some College, No Degree	1,105	28%	135
Associate Degree	347	9%	112
Bachelor's Degree or more	786	20%	124
Population Age 5+ Years by Ability to Speak English			
Total	5,475	100%	452
Speak only English	2,965	54%	297
Non-English at Home ¹⁺²⁺³⁺⁴	2,510	46%	353
¹ Speak English "very well"	1,321	24%	199
² Speak English "well"	528	10%	133
³ Speak English "not well"	472	9%	198
⁴ Speak English "not at all"	189	3%	93
³⁺⁴ Speak English "less than well"	661	12%	201
²⁺³⁺⁴ Speak English "less than very well"	1,189	22%	230
Linguistically Isolated Households*			
Total	209	100%	98
Speak Spanish	17	8%	39
Speak Other Indo-European Languages	0	0%	12
Speak Asian-Pacific Island Languages	150	72%	72
Speak Other Languages	42	20%	95
Households by Household Income			
Household Income Base	1,982	100%	154
< \$15,000	254	13%	136
\$15,000 - \$25,000	147	7%	108
\$25,000 - \$50,000	563	28%	111
\$50,000 - \$75,000	303	15%	114
\$75,000 +	714	36%	99
Occupied Housing Units by Tenure			
Total	1,982	100%	154
Owner Occupied	1,198	60%	106
Renter Occupied	784	40%	147
Employed Population Age 16+ Years			
Total	4,665	100%	424
In Labor Force	3,300	71%	343
Civilian Unemployed in Labor Force	284	6%	81
Not In Labor Force	1,365	29%	193

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race.
 N/A means not available. Source: U.S. Census Bureau, American Community Survey (ACS)
 *Households in which no one 14 and over speaks English "very well" or speaks English only.



EJSCREEN ACS Summary Report



Location: User-specified point center at 47.511387, -122.288747
 Ring (buffer): 1-mile radius
 Description: Emerald Gateway

	2012 - 2016 ACS Estimates	Percent	MOE (±)
Population by Language Spoken at Home*			
Total (persons age 5 and above)	4,670	100%	576
English	2,319	50%	432
Spanish	320	7%	423
French	0	0%	17
French Creole	N/A	N/A	N/A
Italian	N/A	N/A	N/A
Portuguese	N/A	N/A	N/A
German	0	0%	17
Yiddish	N/A	N/A	N/A
Other West Germanic	N/A	N/A	N/A
Scandinavian	N/A	N/A	N/A
Greek	N/A	N/A	N/A
Russian	N/A	N/A	N/A
Polish	N/A	N/A	N/A
Serbo-Croatian	N/A	N/A	N/A
Other Slavic	N/A	N/A	N/A
Armenian	N/A	N/A	N/A
Persian	N/A	N/A	N/A
Gujarathi	N/A	N/A	N/A
Hindi	N/A	N/A	N/A
Urdu	N/A	N/A	N/A
Other Indic	N/A	N/A	N/A
Other Indo-European	0	0%	17
Chinese	701	15%	228
Japanese	N/A	N/A	N/A
Korean	7	0%	89
Mon-Khmer, Cambodian	N/A	N/A	N/A
Hmong	N/A	N/A	N/A
Thai	N/A	N/A	N/A
Laotian	N/A	N/A	N/A
Vietnamese	222	5%	131
Other Asian	424	9%	239
Tagalog	235	5%	168
Other Pacific Island	N/A	N/A	N/A
Navajo	N/A	N/A	N/A
Other Native American	N/A	N/A	N/A
Hungarian	N/A	N/A	N/A
Arabic	25	1%	388
Hebrew	N/A	N/A	N/A
African	N/A	N/A	N/A
Other and non-specified	415	9%	263
Total Non-English	2,350	50%	665

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race.
 N/A means not available. Source: U.S. Census Bureau, American Community Survey (ACS) 2012 - 2016.
 *Population by Language Spoken at Home is available at the census tract summary level and up.



EJSCREEN Census 2010 Summary Report



Location: User-specified point center at 47.511387, -122.288747
 Ring (buffer): 1-mile radius
 Description: Emerald Gateway

Summary	Census 2010
Population	5,615
Population Density (per sq. mile)	1,931
Minority Population	4,394
% Minority	78%
Households	1,849
Housing Units	1,998
Land Area (sq. miles)	2.91
% Land Area	94%
Water Area (sq. miles)	0.19
% Water Area	6%

Population by Race	Number	Percent
Total	5,615	-----
Population Reporting One Race	5,273	94%
White	1,507	27%
Black	1,238	22%
American Indian	72	1%
Asian	1,965	35%
Pacific Islander	95	2%
Some Other Race	396	7%
Population Reporting Two or More Races	342	6%
Total Hispanic Population	813	14%
Total Non-Hispanic Population	4,802	86%
White Alone	1,221	22%
Black Alone	1,210	22%
American Indian Alone	48	1%
Non-Hispanic Asian Alone	1,954	35%
Pacific Islander Alone	88	2%
Other Race Alone	10	0%
Two or More Races Alone	270	5%

Population by Sex	Number	Percent
Male	2,867	51%
Female	2,748	49%

Population by Age	Number	Percent
Age 0-4	397	7%
Age 0-17	1,383	25%
Age 18+	4,232	75%
Age 65+	577	10%

Households by Tenure	Number	Percent
Total	1,849	
Owner Occupied	1,095	59%
Renter Occupied	754	41%

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race.
 Source: U.S. Census Bureau, Census 2010 Summary File 1.

Public Participation Activities

Members of the public may ask questions, submit informal comments, or share site information at any time. Interested parties do not need to wait for a formal public comment period to contact Ecology.

However, to be included in the formal site record, comments about the site investigation, cleanup alternatives, or cleanups must be submitted during formal comment periods. In addition, the public is invited to review site documents before they become final. This is the most direct and influential way to learn more about the site and be involved in the cleanup's decision-making.

How we share information with the community

During specific stages of the cleanup, Ecology will mail notices about public comment periods to addresses surrounding the site. The mailing list area will vary depending on the type of contamination and where it's located, but the list will at least include addresses within a 1/4-mile radius of the site and other interested organizations and individuals. These notices will provide general information about the site, contact information for submitting comments, and times and locations of public meetings or hearings or how to request one if not yet scheduled.

Ecology may also develop documents outside of comment periods to keep the community updated on the site's status. These informational documents will be available online and at document repositories. Print copies may be mailed to the nearby community if we feel the message warrants the associated cost and resources.

Comment period notices and other site announcements may also be posted in various locations throughout the community (for example, local businesses, schools, libraries).

Postal mailing list

Ecology maintains a mailing list that includes addresses within the neighborhoods of Seattle, relevant local, state, and federal government contacts, and other interested parties.

These people receive public comment notices when draft documents are available.

We will add additional individuals, organizations, and other interested parties to the mailing list as requested. If you would like to be added to the mailing list for this site, please contact Brad Petrovich at 425-533-5537 or brad.petrovich@ecy.wa.gov.

Site Register

Public comment periods, events, and other cleanup notices are published in Ecology's [Site Register](#).⁴ To receive the *Site Register* by email, please contact Cheryl Ann Bishop at 360-407-6848 or cherylann.bishop@ecy.wa.gov, or [subscribe online](#).⁵

Newspaper display ads or legal notices

We announce public comment periods and events in ads or notices published in *The Seattle Times*. We will also publish notice on our [Public Input & Events Listing](#).⁶

Email lists

Ecology maintains an email list to update interested persons about this site. If you would like to be added to the email list for this site, please email Brad Petrovich at brad.petrovich@ecy.wa.gov.

Ecology's website and social media platforms

We maintain a website for the 701 Dexter Site.⁷ The website provides site information, and you may download cleanup documents.

We may also share information about cleanup sites through [news releases, our ECOconnect blog, and social media](#).⁸

⁴ ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Site-Register-lists-and-data

⁵ <http://listserv.wa.gov/cgi-bin/wa?SUBED1=siteregister&A=1>

⁶ ecology.wa.gov/Events/Search/Listing

⁷ <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=15112>

⁸ ecology.wa.gov/About-us/Get-to-know-us/News

Document repositories

During public comment periods, you can find print documents at the Ecology Northwest Regional Office and physical locations close to the Site. However due to public health and safety concerns at the time of this document, Ecology cannot offer in-person review options. Please refer to the Site website, or contact Brad Petrovich at (425) 533-5537.

Signs around the cleanup site

We may also install signs displaying information about project status, traffic impacts, and health risks around the cleanup site.

How to share information with us

At minimum, MTCA requires 30-day public comment periods for certain draft cleanup documents and 14-day comment periods for SEPA documents. SEPA documents are often made available for review with other cleanup documents. We may hold comment periods longer than 30 days.

We may also identify public concerns and cleanup goals by meeting with and soliciting information from interested community members and organizations. To collaborate with us about this site, contact Tanner Bushnell at 425-691-0571 or tanner.bushnell@ecy.wa.gov.

Public comment periods

Formal 30-day comment periods allow interested members of the public to comment on draft documents, legal agreements, and proposed cleanup actions. If there is significant interest, Ecology may extend the public comment period. When Ecology oversees SEPA determinations, we hold comment periods for at least two weeks. In this case Ecology is not overseeing SEPA.

Following a comment period, we publish all the input we received and respond to significant comments and questions. If the comments result in significant changes to the cleanup documents, then the documents will be revised and re-issued for public review. If the comments do not result in significant changes, then they become final.

Public events

We hold public meetings, workshops, open houses, and public hearings based on community interest. If we have not scheduled a meeting during a public comment period, we will hold one if 10 people request it, and this may cause us to extend a public comment period so the meeting occurs during it.

Events are held at locations close to the Site that meet Americans with Disabilities Act standards. Public meetings, workshops, open houses, and hearings are always announced in advance using a variety of methods.

Plan Amendments

Ecology developed this plan following MTCA regulations (WAC 173-340-600). We review it as the cleanup progresses and amend it as necessary. You may suggest amendments to Brad Petrovich at 425-649-4486 or brad.petrovich@ecy.wa.gov.

This plan includes information for the public regarding opportunities for public involvement and comment. The outreach activities discussed in this section reflect Ecology's current plans for keeping the public informed and providing ways for those interested in the Site to communicate their concerns and questions to us.

If you feel the planned outreach activities and mechanisms described in this plan are insufficient, or should otherwise be modified, we will work to find solutions. New outreach activities or outreach tools established as a result can be implemented right away, with or without amending this plan.