



June 11, 2013

Mr. Dennis McClerran, Administrator
Ms. Allison Hiltner, Site Manager
EPA Region 10
1200 Sixth Avenue
Seattle, WA 98101

Ms. Maia Bellon, Director
Mr. Andrew Smith, Site Manager
Washington State Department of Ecology
300 Desmond Drive
Lacey, WA 98503

Dear Administrator McLerran, Director Bellon and Manager Hiltner:

As part of a broader coalition of environmental advocacy organizations, citizens, healthcare providers whose primary concern is public health, we are writing this letter of support for a strong cleanup plan for the Lower Duwamish Waterway Superfund Site. The Duwamish River and Elliott Bay are the remaining most polluted areas of Puget Sound. It is crucial we make significant process without delay to protect the health of our citizens, especially our most vulnerable populations such as children, Tribal members and immigrant and refugee populations who are subsistence fishers. Not only is this historically relevant waterway a source of nourishment and life, it is a place for community, recreation and revenue building for the greater Seattle area.

The Washington State Nurses Association (WSNA) and Washington Physicians for Social Responsibility (WPSR) value your leadership in the cleanup process while encouraging public participation. Keeping public health foremost in the discussion, we offer the following comments to strengthen the Proposed Cleanup Plan.

Environmental justice impacts must be better addressed. Therefore, source control must be included in the Record of Decision. Toxic levels of pollution have to be reduced to prevent disproportionate health effects on vulnerable populations, and it is inappropriate to implement institutional control measures as the sole control measure in toxics reduction. It places much of the burden on the affected populations. Upstream solutions not only include educating citizens in a culturally appropriate manner on the health effects of eating highly contaminated fish, it also includes identifying responsible parties and holding them accountable. Pollution control must be enforceable; otherwise we will be right back where we started facing another costly cleanup.

The better plan is to remove all highly contaminated sediments instead of using a "capping" method and moderately contaminated sediments should be removed instead of relying on "enhanced" natural recovery. Recovery of the remaining contaminated area can be accelerated by adding a layer of clean

material instead of relying solely on the “natural process,” and it will ensure better public health outcomes.

To reduce and mitigate future cumulative health impacts caused by toxic pollution from responsible parties, WSNA and WPSR recommends establishing a Pollution Prevention and Mitigation Fund for as long as the site’s health impacts persist. This should be funded by responsible parties and directed by the affected communities.

As mentioned prior in this document, the Duwamish River and Elliott Bay is a source of nourishment, life, recreation and revenue for the greater Seattle area. Employment and income are important social determinants of health. Disproportionally disadvantaged citizens who are directly affected by this site should benefit from job opportunities created by the cleanup to ensure improved health.

Thank you for the opportunity to comment on the Lower Duwamish River Cleanup Plan. Public health care practice is based on prevention. Therefore, it is critical we address toxic environmental exposures by developing policies that stop pollution to prevent future health impacts. The Washington State Department of Health prepared a document in January 2012 titled, “*Impact of Environmental Chemicals on Learning and Behavior*” to alert Washingtonians on the potential contribution of environmental chemicals on children’s learning and behavioral problems. It states that more than 75,000 children (1 in 14 kids) in Washington State between the ages of 3-21 received special education through their school districts for: learning and intellectual disabilities or developmental delays. This is horrific for those families, staggering in terms of economic loss for our State.¹ We can do better. The recommendations in this letter support a better cleanup process that protects the river environment, surrounding wildlife and human health, and will help prevent future health disparities in generations to come.

Respectfully Submitted,

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¹ Washington State Department of Health (2012). Impact of environmental chemicals on learning and behavior.