

Stakeholder Committee Report

*Combined Sewer Overflow
Water Quality Assessment for the
Duwamish River and Elliott Bay
January 1999*



KING COUNTY
Department of Natural Resources



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Prepared by Pacific Rim Resources,
for the Duwamish River/Elliott Bay
CSO Water Quality Assessment Stakeholder Committee

Introduction

This document is the report of the Stakeholder Committee for the Duwamish River/Elliott Bay Combined Sewer Overflow Water Quality Assessment (CSO WQA). The CSO WQA provides information on which to base decisions regarding King County's future combined sewer overflow program. The purpose of this report is to present the conclusions and discussion of the Stakeholder Committee regarding the significance of baseline and CSO risks and recommendations for future actions. The results of the CSO WQA technical study are available in separate documents.¹

The King County Department of Natural Resources, at the direction of the King County Executive, is responsible for conducting the research, coordinating stakeholder input, and developing recommendations to the King County Executive regarding the CSO WQA and the CSO control program as described in the Executive's Preferred Plan (EPP) for Regional Wastewater Services (RWSP). The CSO control program is driven primarily by state and federal CSO requirements. Investments proposed through the RWSP, including those investments for CSO control, account for about a quarter of the total amount of funds being spent on regional waste water issues.

The current CSO control program

CSO control technology can be divided into two types: storage in pipes or tanks until a wastewater treatment plant can handle the CSO flows, and at-site CSO treatment, which consists of storage and treatment and discharge on site. Some CSO control projects already completed by King County included separating stormwater from sanitary sewage flows, building new storage and conveyance tunnels to the West Point treatment plant, and converting two primary treatment plants to CSO treatment facilities.

King County estimates that CSO discharges have been reduced by about half since 1988. The primary focus of the program since 1988 has been to reduce the volume of CSO discharges as much as possible, particularly in the public recreation areas. To date, the CSO program has cost \$61 million, and \$195 million is currently committed to the three ongoing projects. The Executive's Plan would spend another \$311 million for CSO control.

¹ King County Department of Natural Resources. 1998. King County Combined Sewer Overflow Water Quality Assessment for the Duwamish River and Elliott Bay. Volumes I - IV and Appendices. Prepared by Parametrix, Inc. and King County.

Under the Executive's Preferred Plan, projected monthly wastewater rates decrease after 2015, in terms of 1998 dollars. At that point, there will be a larger population base to bear the costs and a significant portion of the wastewater program's debts will be retired. In early 1999 the Metropolitan King County Council will be making a decision on a preferred alternative for the long range wastewater services to be provided by King County through the year 2030.

The input of the Stakeholder Committee has been of considerable interest to the Regional Water Quality Committee (RWQC), the King County Executive, and the King County Council in making their decisions on the wastewater program. Their conclusions were presented to the RWQC on September 10, 1998, and subsequently on October 8, 1998. A member of the Committee has also provided direct written input to the King County Executive. This Stakeholder Committee report will be transmitted to both the King County Executive and King County Council.

The CSO WQA Stakeholder Committee

Since the committee's appointment in November 1996, its work has centered on full-day workshops and half-day working sessions to go over specific details of the project in greater depth. Through these workshops, committee members provided advice on the CSO WQA at its key decision points. Their vision statements contributed to the development of the management goal for the project and in selecting assessment endpoints. They also provided important input to the problem formulation and in the characterization of risk. Throughout the assessment, stakeholders have provided large amounts of time and expertise through their participation in meetings and several technical working sessions, as well as in gathering information and reviewing papers and reports.

To provide useful focus to the discussion of the Stakeholder Committee, King County Executive Ron Sims sent a letter in July 1998 to the Stakeholder Committee posing the following questions.

1. What is the significance of baseline risk in the Duwamish River and Elliott Bay?
2. What is the significance of CSO risk?
3. What should be the next steps for King County's CSO program?
4. Are there areas that require further investigation and dialogue?

The committee used these questions to structure their discussion about the CSO WQA findings. (The letter is included in the Appendix of this report.) Their findings and observations are contained in the next section of this report.

Some members of the Stakeholder Committee reserve the right to provide additional comments once they have a chance to review in more detail a forthcoming report on pathogen risks, results of ongoing long-term sediment quality modeling and new data on chemical concentrations in the prey of juvenile salmon. They stress, however, that these additional data are likely only to strengthen the broad conclusion of the majority of the Stakeholder Committee that the state standard on CSO control should be met by 2030.

There also continues to be issues outside the purview of this study that concern members of the Stakeholder Committee. For example, a stakeholder has noted recent research suggesting possible reproductive risks from endocrine disrupting chemicals. This issue should be revisited in future assessments.

Stakeholder Committee

The Stakeholder Committee was appointed to ensure that the CSO WQA reflects the values of our multi-faceted community. Members include advocates of environmental, business, tribal, and neighborhood interests, agency representatives, technical specialists, and laypeople. Members of the Stakeholder Committee are:

- David Bortz, Washington State Department of Natural Resources
- Elliott Berkihiser, The Boeing Company
- Gerald Brown, Ash Grove Cement
- Patrick Cagney, U.S. Army Corps of Engineers
- Patricia Cirone, EPA Region 10
- B.J. Cummings, Puget Soundkeeper Alliance
- Charles Cunniff, Environmental Coalition of South Seattle
- Allan Davis, Duwamish Valley Neighborhood Preservation Coalition
- Lorna Dove, Georgetown Crime Prevention & Community Council
- Margaret Duncan, Suquamish Tribe
- Kevin Fitzpatrick, Washington State Department of Ecology
- John Glynn, Washington State Department of Ecology
- Bruce Harpham, Rainier Audubon Society
- Patrick Hawkins, Regional Water Quality Committee
- Doug Hotchkiss, Port of Seattle
- Larry Kirchner, Seattle-King County Department of Public Health
- Kathy Minsch, Puget Sound Water Quality Action Team
- David Moore, Sierra Club
- Mark Myers, National Marine Fisheries Service
- Tim O'Brian, Duwamish Valley Neighborhood Preservation Coalition
- Sandra O'Neil, Washington State Department of Fish & Wildlife
- Bill Robinson, Trout Unlimited
- Ruth Sechena, University of Washington, Department of Environmental Health
- Gary Shirley, Metropolitan Water Pollution Abatement Advisory Committee
- Chantal Stevens, Muckleshoot Tribe
- Greg Wingard, Waste Action Project

Key Elements of Stakeholder Committee Agreement

This report presents the Stakeholder Committee's key points of consensus, but it also strives to portray the richness of the diverse perspectives represented on the committee. Below are the key areas of consensus. They are discussed on the following pages.

Preamble

- Existing environmental quality is a serious problem.
- Controlling CSOs is part of the solution.
- A comprehensive program is needed to address the other elements of the problem.

Conclusions

1. There are some areas where existing sediment quality and associated risks to people, wildlife and aquatic life in the river and bay are unacceptable.
2. Current levels of human pathogens and fecal coliforms in the river and bay are unacceptable due to the risk to public health.
3. Controlling CSOs according to the Executive's preferred plan will improve some aspects of environmental quality.
4. Even if CSOs are completely eliminated, overall environmental quality will continue to be unacceptable.
5. A comprehensive regional program to bring the river, its tributaries and the bay to an acceptable quality should be completed at the earliest possible date, but no later than 2030.
6. The regional comprehensive program will require an inter-jurisdictional approach.
7. CSOs need to be controlled as part of the comprehensive regional program.
8. Additionally, the regional comprehensive program would include:
 - control of storm water and non-point sources (of contaminants),
 - development and implementation of total maximum daily loads (TMDLs),
 - public involvement and education programs,
 - sediment remediation at some sites,
 - habitat restoration at some sites,
 - control of NPDES discharges,
 - monitoring, and
 - diligence in developing and implementing protective environmental standards.
9. Additional water quality studies are needed to further refine our understanding of the risks from all sources in the watershed, and to develop, implement and continually update a more comprehensive control program.

Conclusions Pertaining to Baseline Risks

Conclusion #1:

The existing sediment quality and associated risks to people, wildlife and aquatic life in the river and bay are unacceptable.

Discussion

Committee members observed from portions of the draft CSO WQA report that pollutants in the sediments pose a significant risk.² Based on their knowledge of the study area, the committee understands that the sediments have been historically contaminated by CSOs, industrial sources, and non-point sources. Some committee members observed that the sediments being deposited today are cleaner than historical sediments. This could potentially be attributed to control measures of industrial and municipal sources that have been implemented.

However, the committee agreed that contaminants such as PCB, PAH, TBT, lead and arsenic persist in the sediments and continue to impact the quality of the estuary. These impacts are likely to continue until action is taken to de-contaminate, remove, or cap the contaminated areas. The committee noted that since the study did not determine the relative contributions of specific contaminants from CSO's compared to specific other sources (i.e. stormwater, atmospheric deposition etc.), they could not assess the benefits to sediment quality if CSOs are controlled.

Exposure to contaminants from the sediment poses a risk to people, wildlife, and aquatic life. For example, spotted sandpipers are exposed to lead concentrations in their diets³ that are predicted to impair reproduction, and bottom fish are exposed to PAH concentrations that are predicted to cause liver lesions. The study also found that people eating fish every day obtained from the study area have an estimated 1:100 to 1:1000 excess cancer risk from PCB's and arsenic, although it was noted that this group was a small part of the population surveyed. The committee also noted that one does not need to consume fish at this rate in order to show an excess risk. In fact, those consuming fish once every other week show a cancer risk of

² Risk is defined in this report as the probability that harm may occur to aquatic life, wildlife and people as a result of specific adverse conditions. The stakeholder committee understands that the process of risk assessment requires that many assumptions be made and that there is a level of uncertainty associated with each prediction of risk. A discussion about these uncertainties can be found in the technical CSO WQA report.

³ King County Department of Natural Resources. 1998. King County Combined Sewer Overflow Water Quality Assessment for the Duwamish River and Elliott Bay. Volume I. Prepared by Parametrix, Inc. and King County.

Many committee members had strong concerns about impacts of CSOs in the area adjacent to the outfall. This area is known as the “nearfield.” While this study has not focused on nearfield sediment impacts, the information provided indicates changes in the benthic community occur near the Duwamish Diagonal CSO storm drain. More information on the nearfield sediments would be useful to better understand the impacts of CSOs on human health.

Conclusions Pertaining to the Risks Due to CSOs

Conclusion #2:

Levels of human pathogens and fecal coliforms in the river and bay are unacceptable.

Discussion

There is clear agreement among the Stakeholder Committee members that CSOs are a primary source of human pathogens. The risk assessment showed there are times when risks of illness from incidental ingestion of water in the river and bay (e.g., when swimming) are higher than 1:1000.

The risk assessment showed that Duwamish River and Elliott Bay fecal coliform concentrations from human and non-human sources often exceed State water quality standards for the river and the bay. The model predicts that fecal coliform standards will continue to be exceeded after control of the CSOs because of dairy farms, surface runoff, wildlife, failing septic systems, or other unknown sources. However, fecal coliforms from CSOs are of particular concern, as they are more likely to be indicators of human pathogens that can create health risks. The control of CSOs is expected to reduce risks to human health.

Committee members agreed that the risk to human health posed by CSOs is of concern, but they differed on the significance of the risk. Some members assert the CSO WQA shows that CSOs pose an unacceptable risk to human health, because any risk that can be controlled should be controlled. Others observe there is a small likelihood that people will swim in the river or bay near a CSO outfall during a storm.

Some committee members have raised questions about the effectiveness of disinfection for controlling pathogens during at-site CSO treatment. At-site treatment tends to be fairly successful in reducing bacteria and viruses, but less so with regard to the protozoan *Giardia*. It was also noted that *Giardia* can live in marine waters from 10-50 days before their numbers are reduced by 90 percent.

Beyond the risk to human health, several committee members observed that the sight and smell of raw sewage in the water is detrimental to quality of life and the aesthetic enjoyment of the river and bay. Additionally, several committee members raised concerns about community environmental justice issues, in the event that CSOs were not controlled.

Conclusion #3

Controlling CSOs according to the Executive's preferred plan will improve some aspects of environmental quality, and

Conclusion #4

Even if CSOs are completely eliminated, overall environmental quality will continue to be unacceptable.

Discussion

The Stakeholder Committee discussed the effects of CSO removal on water quality. In regard to the effects on risks to human health, there seemed to be a sense that removal would result in lower pathogen levels, and therefore human health risks would be reduced. Committee members agreed that CSOs should be controlled to the state standard of one uncontrolled CSO event per year. Consensus was reached that the program should be implemented by or before 2030. Some members preferred early implementation, while others suggested that the date for compliance could be shifted to the future in order to fund other priority cleanup actions.

Although there was agreement that there is risk to people from CSOs, the committee had differing opinions about the significance of risk to aquatic and benthic life. The CSO WQA identified risks to benthic communities and to English sole from CSO discharges. Some committee members felt this constitutes an unacceptable risk to environmental quality. Other committee members expressed that the data do not support these conclusions.

Most members stressed the importance of completing the pathogen risk assessment, long-term sediment quality modeling and the salmon prey study before final recommendations are made. Other members feel that these additional studies are unlikely to demonstrate significant additional risk.

There also was disagreement over whether an aggressive CSO control program should be pursued. One committee member pointed out that a more aggressive CSO control program would not result in any significant changes in the water quality in the river and the bay. That member suggested using a watershed viewpoint to determine what pollution sources to address, and spend money on sediment cleanup instead. Another member responded that sediment remediation is certainly a good but expensive idea, and wanted to spend funds on a variety of cleanup measures, including CSO control, based on cost-effectiveness.

In addition, there was discussion about contamination from industrial sources. One committee member felt that CSOs are a pathway for industrial contaminants, because some industrial companies are on CSO systems and may discharge spills into the sewers. It was noted, however, that in recent years there has been

Regardless, committee members emphasized the need to address all sources of contamination in the river and bay. Several committee members feel this study highlights the importance of non-CSO sources and can be used as a tool for focussing on the contaminants of most concern and for improving environmental quality throughout the entire watershed.

Other members felt that as much cleanup as possible should be done, especially in light of the expected population growth in the Puget Sound region and the increase in pressure on our resources. Two of their greatest concerns are sediment contamination and habitat loss.

Some individuals noted that if considered on an annual per capita basis, the CSO program is inexpensive and a good value for future generations. In addition, the state CSO control strategy of one event per year is an achievable technology that has been reached by other municipalities in Washington State.

The Need for a Comprehensive Regional Program

Conclusion #5

A comprehensive regional program to bring the river, its tributaries and the bay to an acceptable quality and associated risk level should be completed at the earliest possible date, but no later than 2030.

Conclusion #6

The regional comprehensive program will require an inter-jurisdictional approach.

Conclusion #7

CSOs need to be controlled as part of the comprehensive regional program.

Conclusion #8

Additionally, the regional comprehensive program would include:

- control of storm water and non-point sources (of contaminants),
- development and implementation of total maximum daily loads (TMDLs),
- public involvement and education programs,
- sediment remediation at some sites,
- habitat restoration at some sites,
- control of NPDES discharges,
- monitoring, and
- diligence in developing and implementing protective environmental standards.

Discussion

Committee members are in strong agreement that an integrated program, implemented through the coordinated efforts of multiple jurisdictions, is needed to effectively reduce the risk in the estuary to acceptable levels. Some committee members agree that communities along the Duwamish have historically been subject to adverse environmental impacts, and urge that environmental justice be a consideration in regional decision-making.

An integrated program means that all possible intervention points should be considered including pollution prevention, behavioral changes, source control, remediation, and habitat restoration. To be successful, these measures need to be adequately funded, taking into account their cost-effectiveness. While some members advocated exploring new sources of funding, others felt they did not have enough information on current funding to make a recommendation. Some committee members felt that additional work needs to be done to identify the relative benefits and costs of controlling individual non-CSO sources.

Most committee members urge that the year 2030, or earlier, be used as a deadline for the completion of a comprehensive program to achieve acceptable environmental quality. Committee members suggest that setting benchmarks would be appropriate to ensure incremental progress toward the goal, such as cleanup of “hot spots” (e.g. areas of high exposure to higher levels of chemicals).

Committee members have noted that their recommendations on a comprehensive program are intended to be consistent with and supportive of the Regional Needs Assessment or other regional efforts to improve water quality. A comprehensive program should include both direct interventions and additional research.

Stormwater and Non-Point Source Control

Committee members recognized that there is an ongoing need to control pollution caused by stormwater runoff and other non-point sources. “Non-point” refers to sources of pollution that do not come from a single pipe or outfall. They tend to enter water bodies at multiple points and can be overland flow, ground water, spills, leaks, etc.

Committee members discussed the need for more effective stormwater management. One committee member suggested continuing the work of the King County’s Businesses for Clean Water program to deal with non-point source control (this program is to be discontinued in 1999). In addition, it was suggested that work continue with the Local Hazardous Waste Management Program (LHWMP) and local nonprofits on source control.

Development and Implementation of Total Maximum Daily Loads (TMDLs)

The Stakeholder Committee supports the Clean Water Act requirements for the development of TMDLs. The Clean Water Act, Section 303(d) addresses waters that are not “fishable/swimmable” by requiring states to identify the waters and to develop total maximum daily loads (TMDLs) for them, with oversight from the U.S. Environmental Protection Agency. As such, TMDLs can play a key role in watershed management. The Stakeholder Committee supports the development of TMDLs for the Green/Duwamish watershed.

The goal of a TMDL is the attainment of water quality standards. A TMDL is a written, quantitative assessment of water quality problems and contributing pollutant sources. It specifies the amount a pollutant needs to be reduced to meet water quality standards, allocates pollutant load reductions among pollutant sources in a watershed, and provides the basis for taking actions needed to restore a body of water. It can identify the need for point source and non-point source controls.

Public Involvement and Education

Committee members agree there needs to be greater public awareness of the problems in the river and the bay. Through public awareness, achieved through signage, education, and health advisories, people can reduce their own risk of exposure. For example, signage could encourage people to wear protective clothing or wash off sediments that might be contaminated. However, several members emphasized that signage alone will not fix the problem. For example, tribal fishermen engage in treaty right commercial, ceremonial, and subsistence fishing throughout the affected area, beyond the “hot spots” identified in the CSO WQA that would be marked by signage.

Sediment Remediation

Most committee members maintain that sediment cleanup should be an important priority, because contaminated sediments in the estuary create at least as much risk as CSOs. Some members suggest sediment cleanup would only be followed by recontamination if CSO, stormwater, and non-point source controls are not in place. However, some committee members thought recontamination would be much lower levels compared to the existing sediment contamination.

Some committee members support the idea of an area-wide sediment cleanup plan, using the approach of the Department of Ecology’s former Urban Bay Action Teams for Elliott Bay and the on-going efforts of the Elliott Bay/Duwamish Restoration Project and the Bellingham Bay Sediment Project. A member noted that any area-wide sediment remediation plan needs to be balanced and coordinated with a full area-wide source control plan.

Habitat Restoration

Committee members agree that habitat loss has occurred to a significant extent and that public awareness, regulatory and voluntary actions are all necessary to reverse this loss.

Control of NPDES Discharges

NPDES refers to the National Pollutant Discharge Elimination System and is the regulatory basis for issuance of industrial and municipal permits to discharge to water bodies of the State. The Department of Ecology is responsible in Washington State to implement the NPDES program. The committee recommends that facility inspections by the appropriate regulatory agencies should check to assure that all applicable discharges to the Duwamish/Elliott Bay are permitted and controlled under the NPDES program.

Monitoring

King County should conduct water quality assessments periodically (especially for the most significant contaminants) to establish trends in water quality parameters. The results would feed back into a system of adaptive management that would lead to additional controls/limits as needed to meet acceptable levels of environmental quality.

Diligence in Developing and Implementing Protective Environmental Standards

The County and the State are advised to exercise the highest level of diligence in protecting this priceless resource through strong environmental standards. These standards need to be reevaluated and updated, as new scientific data become available.

Conclusion #9

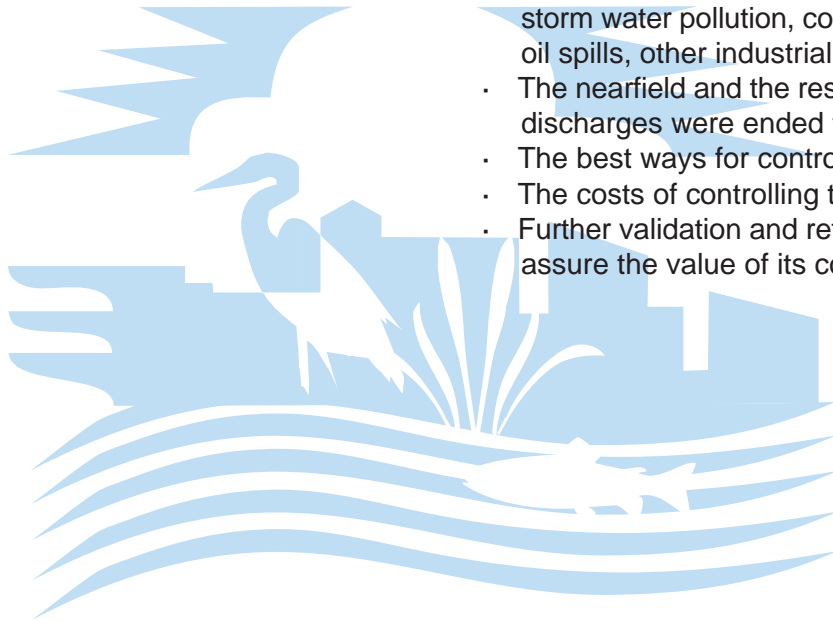
Additional water quality studies are needed to further refine our understanding of the risks from all sources in the watershed, and to develop, implement and continually update a more comprehensive control program.

Discussion

Several committee members felt that additional studies need to be completed to further our understanding of risks to people, wildlife, fish, and the environment. This includes completion of the pathogen risk assessment, the long-term sediment quality modeling and the salmon prey item study. Committee members also discussed the importance of exploring biomarkers and issues related to the increase of chemical endocrine disrupters.

Committee members expressed interest in studies that would determine the risks posed by specific sources of contaminants other than CSOs. Committee members assert that knowledge about the benefits of controlling each of the pollutant sources and the associated costs is necessary for making good decisions about CSO control. They see additional studies as a means to make adaptive management choices in implementing an overall program to achieve acceptable environmental quality in the Duwamish River and Elliott Bay. These include further work on:

- The contribution of other specific sources, such as agricultural practices, forestry practices, storm water pollution, continuing CSO discharges (after control) transportation, air pollution, oil spills, other industrial spills, leaks, water run-off, shipbuilding and maintenance;
- The nearfield and the results of the long-term modeling of the estuary's conditions if all CSO discharges were ended today;
- The best ways for controlling these sources;
- The costs of controlling these sources and the cost effectiveness of various actions.
- Further validation and refinement of the existing CSO WQA model to increase certainty and assure the value of its continued use in CSO control planning; and



Acknowledgment

King County is grateful to each member of this Stakeholder Committee for their dedication to this project and the energy, skill and patience required to produce these consensus recommendations. Because of their efforts, policy makers are better equipped to make decisions that reflect the values and the needs of our community. Thank you very much.

Ron Sims
King County Executive

February 1999

Appendix





King County Executive
RON SIMS

July 31, 1998

Lorna Dove
Georgetown Crime Prevention &
Community Council
6435 Flora Avenue South
Seattle, WA 98108

Dear Ms. Dove:

Thank you for the time you have spent over the last year and a half as a member of the Duwamish River and Elliott Bay Combined Sewer Overflow (CSO) Water Quality Assessment Stakeholder Committee. The questions you have been addressing are critical to future decisions about how to best provide stewardship for our Puget Sound waters. I look forward to getting the benefit of your observations about the work being done as part of the Water Quality Assessment (WQA).

King County and local governments in the region have some critical decisions to make over the next several months. I would like to be able to factor your insights into our considerations of future water quality investments.

Your work is now reaching a critical juncture as the findings of the WQA are becoming available. I need your help in understanding the import and significance of these findings, given your involvement in various aspects of stewardship of our waters. I have asked my staff to work with you in addressing the Committee's discussions about the WQA findings. I am particularly interested in knowing your thoughts on the questions that are included as an enclosure to this letter.

I anticipate that there will be much continuing dialogue with the King County Council during its review of the Regional Wastewater Services Plan. Your input will be a crucial part in shaping our long-term thinking about the CSO program and, even more broadly, how we manage water quality in the Duwamish and Elliott Bay.

I realize that you are dealing with a number of highly technical and difficult policy issues for which there may be no consensus. I want to be informed by your debate and discussion, and if there is consensus, I want to hear about that too.


KING COUNTY COURTHOUSE 516 THIRD AVENUE, ROOM 400 SEATTLE, WA 98104-3271
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Lorna Dove
July 31, 1998
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When I was first elected King County Executive, I made a firm commitment to serve as a strong steward of our environment, and I am reaffirming to you my commitment to taking all practical steps to assure high level of water quality now and into the future. I am particularly grateful to you for your contributions to the Duwamish River and Elliott Bay Water Quality Assessment. Your participation means a tremendous amount to all King County residents.

I look forward to your observations and recommendations over the next few months. Thank you again for your important contribution to water quality in our region.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Sims", written over a circular stamp or mark.

Ron Sims
King County Executive

RS:pr

Enclosure

cc: Pam Bissonnette, Director, King County Department of Natural Resources

What is the significance of baseline risk in the Duwamish River and Elliott Bay?

- ☞ Overall, how would you characterize the quality of the Duwamish River and Elliott Bay?
- ☞ What are the most significant problems affecting the river and the bay?

What is the significance of CSO risk?

- ☞ How would the quality of the Duwamish River and Elliott Bay change if we removed CSOs?
- ☞ How would the most significant problems be changed by removing CSOs?
- ☞ How would ecological impacts be reduced if CSOs were removed?

What should be the next steps for King County's CSO program?

- ☞ Last April, I proposed that King County plan to achieve the Washington State CSO standard by 2030. I did not have the benefit of the WQA. Based on what you know now, should I change my proposal? If so, how?
- ☞ Do you have any recommendations about how we should implement our CSO control program? For example, are there particular CSOs we should place high on our priority list? Are there any specific ideas we should be looking into to reduce the most significant problems?

Are there areas that require further investigation and dialogue?

- ☞ Aside from CSO control, what short-term actions should be taken to improve the quality of the river and bay?
- ☞ What are some longer term actions that should be taken?
- ☞ What do you think we need to learn to make better investments to improve the quality of the Duwamish River and Elliott Bay?