

# EDMONDS ENVIRONMENTAL COUNCIL



**November 23, 2024**

Dear Tanner Bushnell, WA Dept. of Ecology;

The Edmonds Environmental Council (EEC) is concerned that the Draft Feasibility Study is lacking in presentation and analysis of additional Alternatives whose costs and environmental benefits (especially for statewide salmon recovery) may result in Dept of Ecology selecting a preferred cleanup alternative other than Alternative 6.

An obvious missing Alternative is cleanup by excavation of all remaining contaminated sites except for the one site around the WSDOT pipe where the DPE system has operated. The public has understood there are complications with cleanup around the WSDOT pipe, but can't understand why other remaining sites would be left contaminated – the DCA for this Alternative might help explain this (or indicate this should be the preferred Alternative).

Another Alternative that needs analysis would be to require cleanup of all sites necessary to allow an up-to 20-foot wide by 10-foot deep “salmon channel” (and affiliated buffer) to transverse the property without risk of contamination. This Alternative may have sub-alternatives that present different routes for the channel.

It is also not clear if there are some remaining contaminated sites, other than the WSDOT pipe, that have unique aspects that elevate their cleanup cost. If there is such disparity in cleanup costs for the remaining sites, then that should be presented and addressed in Alternatives that leave those sites (as in Alternative 6) but require cleanup of all other less costly sites. Such presentations and respective Alternatives will help the public understand if/why Dept of Ecology would still agree that Alternative 6 should be the preferred Alternative.

The EEC requests that the Feasibility Study be revised to include the above and other Alternatives that the Dept of Ecology (not Chevron) deems necessary for determining a preferred cleanup Alternative. We also request that the DCAs put more weight on benefits to salmon recovery as that is the intended future use of the property. We also request the revised Feasibility Study (as described above) be made available as a draft for public comment.

Joe Scordino, President of the Board  
Edmonds Environmental Council  
<https://EdmondsEnvironmentalCouncil.org>