

OK. I'm Doug Averett, President of the Port Commission at the Port of Longview. And the Port will submit a formal written comment, but I wanted to highlight some of our greatest concerns. We appreciate the work that has gone into the RI/FS, but oppose the remedial alternative put forward by International Paper. IP seeks a complete on-site solidification which combines low-level contaminated soils with highly-concentrated contaminated soils with a solidifying agent. These contaminated, solidified soils will then be left on-site for the Port and its constituents to deal with in the future.

IP's proposal poses long-term risks and fails to account for public concerns on a number of counts; substantially increases the quantity and mass of contaminated soils which will alter the topography and negatively impact the Port's ability to redevelop its property and meet its mission of creating economic opportunity for the state and its local community; also fails the disproportionate cost analysis because it does not consider the reasonably foreseeable redevelopment costs that are incurred because of the increased volume of hazardous substances left on-site. It also fails in its protectiveness evaluation because solidification is only effective long-term if the material remains undisturbed which does not correspond with the Port's future development plans. The Port wants Ecology to select an alternative that combines the best elements of solidification and off-site disposal that would provide the highest level of protectiveness and permanence with a moderate level of increased cost (which, by the way, the Port has offered to pay for).

It's undisputed that the contamination in this area was caused by IP's historical wood treatment operations and the burden of cleaning it up should not be shouldered by our community. You simply cannot allow a corporation to leave their contamination behind and leave town. IP contaminated, IP should clean it up. It is Ecology's responsibility to ensure that the remedy meets the MTCA – Model Toxics Control Act, but also ensures that the Port is not left with the legacy contamination and future costs. Ultimately, the Port's preferred proposal protects human health, the environment, and the economic well-being of our local community. Thank you.