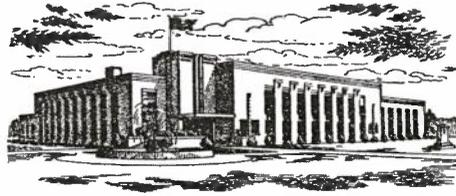


Wes McCart
District No. 1

Mark Burrows
District No. 2

Greg Young
District No. 3



Michelle Enright
Clerk of the Board

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Stevens County Commissioners

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John Roland, Site Manager
4601 N. Monroe St.
Spokane, WA 99205
john.roland@ecy.wa.gov

Re: Northport Waterfront Cleanup, Facility Site ID: 96239, Site Cleanup ID: 14874

Mr. Roland,

I would like to submit the following for the record on behalf of the Board of Stevens County Commissioners and the over 45,000 citizens we represent in Stevens County.

First, I would like to invite you to schedule a meeting with the Stevens County Commissioners to review in detail this project, the exact human health concerns, ecological concerns and the scope of this project and the bearing it will have on future actions of possible clean up in the greater Northport area and Lake Roosevelt. As we both know there are other remedial investigations and feasibility studies being done in the region and Stevens County and if they are not done in concert there is the prospect of harm to the economy of our area and may adversely affect the public health of our county residents which we represent.

What is your preferred alternative? There is no indication of which option will be moved forward or the desire to move forward. This seems problematic, as the goal of a cleanup operation is to eliminate the human health and ecological hazard that exist or limit the exposure to acceptable limits. Also, why are all the options other than the Beach limited to one for moving forward when other options are considered in the feasibility study. This was not discussed in the public meeting (Webex) as an option for comment and consideration. Again, human health should be the main concern.

What is the reason for not capping the entire site? The first priority seems to be removal of material. Is this the best long term solution? Considering most of the material considered for removal is underwater part of the year, is creating sediment movement safe? Will your method create a long term or permanent solution?

Why is the scope of this project stopped at the bridge? Is there something magical about the sediment south of the bridge? I find no conversation of studies conducted south of the bridge in the beach area. People using this area are not confine to north of the bridge, so what is the reason for stopping at that point.

Why is the State and MTCA funds being used to clean up this site, and why now? It is clear from the materials and study that in 2004 EPA did a clean-up of the Le Roi Smelter site. Why was this area not cleaned up at the same time? Why are we paying for this clean up? It seems the Northern Pacific Railroad was responsible for the cost of some of the clean-up at the smelter site, yet we are now using MTCA funds. This seem counterproductive.

Do you plan on using coffer dams to make sure that all work is done outside of a water environment? This project is slated to take one or two years to complete. How are we securing the site from creating an additional hazard as time progresses and the water flows over some of the cleanup areas during high water runoff? Will precautions be taken to limit dust or to avoid sediment movement into the water while work is being done? Will the public have a chance to comment on these items at a later date? If so, when and at what juncture?

I believe your comment period is inadequate and should be extended with additional outreach and comment/questions allowed. I and others tried to log onto the webinar on May 19. All attempts failed. I click on the email log in and got an error message, then hand typed the address of the flyer and got the same. Finally, I called into the webinar. The slides were not released ahead of time for us to follow along. Internet service is poor in many areas of the County, yet other accommodations were not made. You and the other presenters recognized this during the meeting, but the public was not given further opportunities. I understand the limitations due to COVID, but that is not an excuse to circumvent or shorten public participation. Also, there was no recognition of people on the phone. No ability to ask questions or provide comment for others to consider or start conversations. I believe another presentation and opportunity must be given to the public to participate before moving forward and during the entire process. Section 3.1.3 of the Feasibility Study states "Ecology anticipates holding workshop public meetings to discuss the draft FFS and associated clean up alternatives..." Only one meeting was scheduled with limited attendance and no ability for some participants to ask questions.

Where is the fill material coming from? Will it be tested prior to use? What is the cost of the material? I found no discussion on this in the FS document.

Page 9 of the feasibility study show cost comparisons of disposing of material, one in Stevens County and one in Spokane. There are several problems with this information. First, Stevens County has a flow control ordinance which prohibits taking disposal materials to another county. Ordinance 2008-4 is included with these comments. We have had this issue with other cleanup project and do not wish to ticket each truck leaving the county for violation of the ordinance. Second, the cost estimates are flawed. The distance of travel is almost 4 times as much to go to Spokane, but the cost to haul the material is only 2.4 times as much. Whether

paying by the hour or the mile, both of which are standard trucking practices, would mean that hauling cost to Spokane would be approximately 4 times as much. Lastly there is no consideration of the number of trucks or the effects on the roads for travel. To go to Spokane would require approximately 313-545 FTEs of driving time for Spokane and 78-136 FTE's for Stevens County depending on the option chosen. There is also no consideration about the effects that many trucks would have on the roads, approximately 625-1090.

Have the effects of climate change been considered in developing these alternatives? I see nothing in the studies addressing this.

The remediation investigation seems to be very lack. The study area is limited and not nearly as thorough as ongoing investigations in and around Lake Roosevelt. How can this be justified? Are the standards used for cleanup here the same as the EPA standards – why or why not?

What is the bioavailability of any of these contaminants? There is no discussion of this in any of the documents that I can find. So, where is the human health or ecological health nexus?

There is no discussion of long-term monitoring or how these designs will last long term or permanent. There should be a plan and discussion on this.

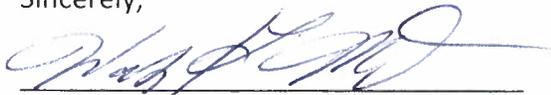
If a cap fails or planting do not keep people out and a new health hazard exists, who will be responsible for repair and cleanup?

Is this project going through SEPA? What permits will be required and when will this be discussed.? Will the SMA/SMP apply? It should.

How will “capping” work if on page 14, section 5.4 of the RI talks about sediment movement (transport)?

There must be a public conversation to these issues to foster additional questions and answer questions coming from the public and surrounding issues of cleanup in the area. Please allow for more public workshop opportunities.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Wes McCart', is written over a horizontal line.

Wes McCart
Stevens County Commissioners - Chair