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As an Edmonds resident, I believe the Edmonds Marsh needs to be fully restored so it can once again provide critical salmon-rearing habitat and function as an estuary which supports the health of Puget Sound and its inhabitants. It is imperative that Chevron be required to excavate and permanently remove the remaining contaminants in the Marsh (Alternative 4) and that it not be allowed to merely cap and cover them (Alternative 6).

Chevron benefitted from its use of the Unocal site for decades and caused significant environmental damage. Chevron must permanently remove the contaminants and leave the Edmonds Marsh in as clean a condition as is possible so it can be reasonably maintained, or restored, by a future owner.

Capping and covering contaminants is not an appropriate, long-term cleanup solution in the Edmonds Marsh for the following reasons:

Limits Future Use: Capping and covering would limit the Marsh's potential future restoration because the remaining contaminants would need to be removed prior to daylighting the stream that connects the Marsh with the Sound. This future cleanup would add huge, likely unaffordable, costs to restoration efforts by a future owner.

Burdens Future Owner: Even if the future use of the Marsh does not include full restoration, capping and covering would unfairly burden future property owners by requiring them to assume liability for managing, and potentially removing, Chevron's contaminants.

Climate Change: Scientists have established that climate change will cause rising sea water levels and more frequent flooding along the Edmonds shoreline and in the Marsh. It would be unconscionable to leave contaminants capped and covered in the Marsh when we know that it is only a matter of time before rising water levels and flooding will likely carry these contaminants from the Marsh into Puget Sound. This would pollute our beaches and water ways and endanger people and animals.

I have these additional concerns:

Updated Soil Samples: This is the last opportunity the residents of Washington have to hold Chevron accountable for cleanup of the Marsh. Therefore it is critical that this decision be based on current and accurate data. Updated soil samples need to be analyzed before the feasibility study is complete.

Include Future Potential Restoration: The potential future restoration of the Edmonds Marsh needs be added to the revised feasibility study. The City of Edmonds and the State of Washington have already done a lot to lay the groundwork for daylighting the stream and fully restoring the Marsh.

Two WACs support the future restoration of the Marsh being included in the criteria that will be used to determine the most appropriate level of cleanup, specifically WAC 173-340-351(6)(a), which states: Include any planned future uses of the site or any habitat restoration or resource recovery goals for the site, and, WAC 173-340-708: (3) Reasonable maximum exposure, which states:

(a) Cleanup levels and remediation levels shall be based on estimates of current and future resource

uses and reasonable maximum exposures expected to occur under both current and potential future site use conditions, as specified further in this chapter.

(b) The reasonable maximum exposure is defined as the highest exposure that is reasonably expected to occur at a site under current and potential future site use.

In conclusion, the Department of Ecology needs to hold Chevron to the highest standard in this cleanup and require it to permanently remove the contaminants that remain in the Edmonds Marsh. In the years ahead, let us not look back at this critical juncture and ask incredulously, "Why, with all the available science and the decades-long focus on restoring our salmon, saving our orcas, and improving the health of Puget Sound, was Chevron allowed to cap and cover contaminants in the Edmonds Marsh?" We can, and we must, do better.

Please opt for Alternative 4, or a similar option, which requires Chevron to permanently remove the contaminants it left in the Edmonds Marsh.