

Jane O'Dell

After attending several public meetings on the subject of the cleanup of the Unocal property in Edmonds I am particularly appreciative of the challenge you face in resolving this matter. While some of the comments may seem redundant at this point that should not detract from their importance.

1. Unocal used the property in ways that have left toxic residue, which is harmful to biological forms (plants, animals, humans) and while the Model Toxic Control Act has provisions for cost benefit analysis, it is also clear that the cleanup must anticipate future use of the property. Perhaps a different use was anticipated when the contract for sale was originally negotiated, but that is not relevant now. MTCA requires that future use be considered, and any future use can be expected to affect living things at some point. This is a problem Unocal created; they are not being victimized. They operated a for-profit activity in a way that left significant levels of toxicity behind. As a resident of Edmonds living less than a quarter mile from the site I believe it should be cleaned up.
2. The MTCA allows the cost benefit to be considered in determining the level of cleanup necessary, but the proposals we have seen to date lean heavily on some areas of cost and fail to note others. The description of public concern, for example, was described as concern only for noise and dust created by the cleanup and ranked quite low, while I and many other citizens are more concerned with the final outcome. It seems appropriate to have a more transparent way of weighting the considerations. Moreover, the costs and benefits are specified by Chevron and are reduced to the contents of two plans (Alternative 4, which involves removing all remaining contamination, and Alternative 6, which calls for capping contaminated areas). The "future use" also under discussion, a restored estuary and wildlife sanctuary, would benefit from Alternative 4 and that is preferred, but Alternative 6 should not be the only alternative under discussion.
3. Alternative 6 is, on its merits, flawed. Capping the contaminated areas is only a solution to the extent that the caps are not disturbed, but the Unocal parcel is in the flood zone and a seismic hazard zone; it is extremely likely that the caps will be disturbed, allowing contamination to penetrate the rest of the Marsh and even escape into Puget Sound. This is not an acceptable solution and needs reconsideration.

We have an opportunity to get this cleanup done right: a safer result, and maybe at an intermediate cost somewhere between the price tags assigned the alternatives by Chevron. Please give due weight to the concerns of the residents, and let's undo the damage inflicted by Unocal's operations. Thank you, and for all the effort you have put into engaging with the people of Edmonds on this issue!