

# Ann Christiansen

I oppose option 6 as the preferred clean up choice for the Unocal site in Edmonds.

First, the cost analysis for option 6 doesn't include replacing the WSDOT storm water pipe running through the site. This pipe is nearing the end of its' useful/safe life. It will need to be replaced, whether planned or during an emergency failure. If this pipe fails, the contaminated soil around it will be disturbed and the covering of contaminants via option 6 fails! The full cost of pipe replacement should be added to the total cost of option 6 to consider it alongside the other options.

Secondly, the covering of hot spots in option 6 is inconsistent with the proposed use of the site. Capping contaminants from above in areas with water saturation from all directions, including below, seems at best unlikely. The DPE recommended states it: "Depresses the groundwater table by pumping out groundwater..." How could a marsh possibly be established with groundwater level continually be depressed? Additionally, the TEE address plants, soil, and wildlife that live (current tense) in the area. The TTE doesn't address future water dwelling plants and animals. How can a proposed solution that doesn't account for water in a revitalized marsh be considered: "the alternative that is permanent to the maximum extent practicable[?]"

Last, and possibly most importantly is an issue regarding the cost vs environmental benefits. In addition to the cost of option 6 excluding storm water pipe replacement (see above), I have little patience for Unocal's choosing a less costly clean up. Unocal ran a petroleum blending, storage, and distribution facility on this site for 68 years, followed by an asphalt plant in the same area for 22+ years. Obviously, the company was profitable during this 90+ year period because they kept operating and remained in such a good business position that they were purchased by Chevron in 2005 for \$17.9 billion. In 2022 Unocal/Chevron profits were \$26.3 billion while in 2023 they were \$21.3 billion - that's billion with a "b." There should be no shortage of money from Unocal/Chevron to pay for thorough and permanent clean up - OPTION 4! Unocal/Chevron used this site, left their contaminants behind, and now should pay remove their remaining mess and return the site to its' pre-Unocal condition. Appropriate clean up is a necessary cost of doing business and Unocal/Chevron should not be allowed to choose the least costly option and force the people of Edmonds to be responsible for an actual permanent clean up.