

BCC 2014-053  
April 9, 2014PHONE: (406) 258-4877  
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Scott Graham  
Missoula White Pine Sash Site Project Manager  
Montana Department of Environmental Quality (DEQ)  
Remediation Division  
P.O. Box 200901  
Helena, MT 59620-0901

**RE: MISSOULA WHITE PINE SASH PROPOSED  
FINAL CLEAN-UP PLAN COMMENTS**

Dear Mr. Graham:

The Missoula Board of County Commissioners writes to convey our comments regarding clean-up of the former White Pine and Sash Site. We believe that the final clean-up should be as complete as possible in order to protect public health and our sole source aquifer. This includes remediation of contaminated groundwater and soils at the site. We support a clean-up that is thorough enough to use the currently vacant portion of the site for residential development, as municipal zoning allows, **and** does not transfer any known or potential portion of clean-up and associated costs to future residents, citizens, or taxpayers. We support complete removal of the injection well and sludge in the former wood treatment area to ensure the most effective clean-up possible for the Missoula Aquifer.

We believe that it is reasonable to assume that the vacant portion of the site, specifically, the northern undeveloped parcel also known as the "Scott Street parcel," may be used for residential purposes at some time in the future. In order to protect public health, this portion of the site must be remediated to levels protective of public health assuming residential use.

We know from other clean-up experience in our community that restricting clean-up to industrial standards limits future beneficial uses of the land and transfers costs to other parties. This has occurred at the former Stimson Mill Site in Bonner. At this site, the clean-up standards were based on industrial uses, and a large waste repository was permitted with an institutional control that restricts residential land use. However, the location and design of the repository effectively precludes all beneficial uses of a portion of the property. Nothing can be built on an approximately city-block sized area affected by the waste. It restricts access and infrastructure improvements on the site that would facilitate economic development. The cost of removal of the repository is now being considered by the current landowners and may be paid for in part by local property taxes. The clean-up may have cost Stimson Lumber \$600,000 to complete several years ago, but now the cost may be more than \$2 million.

The Missoula Northside community has changed significantly in the two-plus decades we have been monitoring the former White Pine and Sash Site. The clean-up plan needs to protect for the uses currently allowed through zoning, which include residential.

Sincerely,  
BOARD OF COUNTY COMMISSIONERS

  
\_\_\_\_\_  
Jean Curtiss, Chair

**NOT AVAILABLE FOR SIGNATURE**  
\_\_\_\_\_  
Bill Carey, Commissioner

  
\_\_\_\_\_  
Michele Landquist, Commissioner

BCC/ppr

cc: Peter Nielsen, Environmental Health  
Jon Harvala, Environmental Health  
Pat O'Herren, CAPS Director  
Greg Robertson, Public Works Director