Table comparing top two proposed alternatives to take action in Trainsong Park to address dioxin contamination

See Consultant's Report "Analysis of Brownfield Clean-Up Alternatives"

Source – Lisa Arkin, 11/2026

Proposed Protection	Alternative 3 (preferred)	Alternative 4
Short description	Alt. 3 requires excavation and disposal of approximately 7,700 cubic yards of impacted soil in a landfill.	Alt. 4 calls for excavated soils to be consolidated onsite in a containment area shaped as a berm or large mound topped with geotechnical fabric and a 2' soil cap.
Take action	Address all dioxin contamination by removal.	Address all dioxin contamination by onsite storage and capping.
Remove soils with dioxin	Excavate down to 3 ft. in the contaminated areas of the park.	Excavate down to 2 ft. in selected contaminated areas of the park to replace with clean fill dirt. Other areas are not excavated but are capped with concrete.
What happens to the dioxin-contaminated soils?	Leave no dioxin in the park.	Dioxin contaminated soils are left in the park. Solutions include 1) Excavate and replace soils; 2) Compile and cover in one mound; 3) Cap soils in place without excavation in multiple sites.
Disposal	Haul all contaminated soils off-site to a landfill.	Leave contaminated soils within the park boundaries/onsite.
Protections for park users	No ongoing protection is needed because all contaminated soils will be removed from the park.	Contaminated soils remain onsite; necessitates building a berm 4-6 ft. tall to store dioxin-contaminated soils in perpetuity or capping.
Park characteristics	Park restored to the original grade. Areas disturbed by construction activities would be stabilized with hydromulch and plantings.	Berm will have "ADA-compliant side slopes" making it attractive for play. Will change contour of park and obstruct views and access in the NE section of park closest to homes between Morse and Bell streets. Various park improvements plus more concrete to cover key areas.
Effectiveness	Quote from consultant report (p. 9): "Alternative 3 remains **the most effective alternative** from a contaminant removal standpoint	Quote from consultant report (p.9): "Alternative 4 is judged to be nearly as effective because it removes impacted soils from active use areas and isolates

	because all soil exceeding the Site-specific RBC (to a depth of 3 feet bgs) would be excavated and removed from the Site."	remaining contaminated soil within a centralized containment area protected by a demarcation layer and engineered cap."
Reliability	Quote from City's consultant report (p. 9): "Alt. 3 is judged to have the highest level of long-term reliability because contaminated soils is permanently removed."	Quote from City's consultant report (p. 9): Alt. 4 is judged to have the lower level of long-term reliability because" … soils remain onsite and requires long-term maintenance.
Inhalation risks	Measures taken to reduce possible exposure to dust and truck exhaust from excavation activities.	Measures taken to reduce possible exposure to dust and truck exhaust from excavation activities.
Costs	Costs from excavating and hauling contaminated soils to a landfill, then replacing that will clean fill dirt.	Costs from excavating, plus additional costs to build the berm, purchase engineered fabric, gravels and clean fill dirt; Must establish a fund in perpetuity to monitor and repair protective caps, fabrics, gravel, and soils from deterioration and exposure to rain, floods, and general usage.

Suggested points to make in your public testimony

To provide comments on the proposed alternatives for the Trainsong Park Cleanup, send email to sarah.eagle@deq.oregon.gov by 5 p.m. December 11th.

- I strongly recommend choosing Alternative 3, which removes and hauls away soils that are contaminated with dioxin. This is the most protective action for today's Trainsong residents and the long-term future.
- I agree with this summary statement by the consultants hired by the City: "Alternative 3 is judged to be the most climate resilient, as dioxin contamination is reduced below the Site-specific RBC, which is protective of human and ecological receptors."
- I agree with this summary statement by the consultants hired by the City: "Alternative 3 remains the most effective alternative from a contaminant removal standpoint because all soil exceeding the Site-specific RBC (to a depth of 3 feet bgs) would be excavated and removed from the Site."
- We must take action based on the community health, especially for children and future users of Trainsong Park, and we must not choose based on assumed price points.

- Alternative 3 is most cost effective. Alternative 4 is the most costly because it will require a sizable standing budget item into the foreseeable future to monitor and repair the engineered controls that will cap the contaminated soils left in the park. This is risky from the standpoint of an ongoing financial burden for the City. Significant repairs can be anticipated due to deterioration of soil caps and fabric caps from rain and flooding in this low-lying area.

- I disagree with the assumption in Alternative 4 that is alright for children to play on a mound of dioxin-contaminated dirt. There is no guarantee that the contaminated soils won't be exposed over time which would increase health risks for vulnerable children. Alternative 3 will protect children by permanently removing the dioxin contaminated soils.