

Randal Friedman

Angela – Thanks for scheduling the Public Hearing so quickly. I look forward on April 20th to an informative session and the ability of our community to provide feedback.

Monday night I gave a public comment to the Camas City Council. My comment provided an update to the draft Order and Public Participation Plan. Given concerns with the current proposal, I suggested the City join the Port in supporting an Advisory Committee and the City having a “seat at the table.” A number of the Councilors later in the meeting expressed support for both the Advisory Committee and the seat at the table. This was not a formal action by the City.

With these expressions of support from both the Port and Camas, I developed the attached addition to Task 5 of the Public Participation Plan. It would create an Advisory Committee with appropriate support and responsibilities. The draft language amending Task 5 is attached.

While my request only, it is one based on my professional experience in the cleanup of complex sites for reuse. Its model is what the US Navy and other military services have been using since 1990. I’m specifically referring to Restoration Advisory Boards (RAB). RABS continue to provide the means for communities to participate in the important task of environmental cleanup at military installations, especially those that have closed.

In a 1994 joint document for implementation of RABs, USEPA states: “RABs bring together people who reflect the diverse interests within the local community, enabling the early and continued flow of information between the affected community, DoD and environmental oversight agencies. DoD is creating RABs to ensure that all stakeholders have a voice and can actively participate in a timely and thorough manner in the review of restoration documents. RAB community members will provide advice as individuals to the decision-makers on restoration issues. It is a forum to be used for the expression and careful consideration of diverse points of view. “

See <https://www.epa.gov/fedfac/restoration-advisory-board-rab-implementation-guidelines#community>

The RAB example is illustrative and provided with the hope of starting a discussion, hopefully at the upcoming Public Hearing.

I think appropriate content for the upcoming Public Hearing also includes Ecology and GP making a public presentation on this Agreed Order, the cleanup process, and discussing this request for an Advisory Committee.

To show one example of how this cleanup is fundamental to Camas’ future, I was on a ZOOM meeting this week to discuss the ongoing Camas Housing Study. Sarah Fox, a senior planner for Camas, mentioned only 10% of the City’s land was zoned multi-family. She said that was part of the problem in meeting Washington State housing mandates.

I commented this is an example of why this Order needs to change.

The hundreds of acres of mill property remain limited and zoned for Heavy Industry and can’t be included in this Housing Study. With mill property “off-limits”, the City has to look for other places to rezone and intensify. Those tend to be outside the downtown core. Development outside the downtown core could make Camas lose its walkability, likability, and a transit friendly future.

Once again, the mill’s cleanup is central to this, and the very future of how Camas grows to accommodate State housing affordability requirements.

The mill’s cleanup is central to the City’s next century, period.

The cleanup of the Camas Mill should not leave the City with only heavy industrial options. There should be community involvement throughout the process prior to these decisions being made.

Again, this is my proposal and I infer no review by any other party.

I welcome discussion.

Randal Friedman

TASK 5. PUBLIC PARTICIPATION

The Camas Mill is the heart of and Camas and its Historic Downtown. Its cleanup is vital for the City's future. There has been a request for creation of an Advisory Committee to ensure the current and future plans of Camas are considered, and the cleanup is done consistent with the mill property serving as Camas' heart. These Committees are used in other complex cleanups. For example, in 1994 Implementation Guidelines were published by the US Department of Defense and US Environmental Protection Agency calling for creating Restoration Advisory Boards for cleanup of military installations.

Ecology agrees an Advisory Committee for this complex cleanup, given post-industrial use considerations, would provide needed review and consensus on a Final Remedial Investigation and Interim Actions as required in this Order.

Recognizing the role of local agencies in this process, Ecology leaves the decision on creation of an Advisory Committee to the local agencies with authorities over the mill property, the City of Camas and the Port of Camas/Washougal.

Upon support from City of Camas and/or the Port of Camas/Washougal, including their willingness to participate; GP shall assist Ecology in the formation and administration of a Camas Mill Cleanup Advisory Committee (CMCAC). GP shall submit a proposal and work plan for the standup and support for CMCAC within 45 days of the Agreed Order.

The CMCAC should include a diverse representation of the Camas/Washougal area and at minimum shall include representatives from the City, Port, and community-based organizations like the Downtown Camas Association and the Camas/Washougal Chamber of Commerce. It should include public members appointed by the City of Camas and the Port.

In the event an organization is granted a Public Participation Grant for this site, that organization shall be represented on the CMCAC and considered for a leadership role.

For purposes of this Order, the term "Agency Review" includes the opportunity for the CMCAC, if formed, to review and comment.

For purposes of this Order, CMCAC review includes key subtasks and milestones documents, like the sampling plan, before they form the basis a draft Remedial Investigation and its specific public review requirements.

Ecology will coordinate document review and provide reasonable time constraints to assure timelines of the Order are met. At Ecology's discretion, requests for additional time by the CMCAC shall be considered within the framework allowed to Ecology for document review.

The City of Camas and Port of Camas/Washougal shall have 15 days to review the CMCAC proposal from GP and suggest Ecology consider needed changes to accommodate reasonable community needs.

Upon approval by Ecology, GP shall assist in the CMCAC holding its first meeting within 30 days of approval.

After review by the CMCAC, if formed. GP shall support Ecology in presenting the Public Review Draft RI Report and SEPA evaluations at one public meeting or hearing. The GP will assist Ecology with presentations at any additional meetings or hearings that might be necessary for SEPA compliance or as part of the Public Participation Plan.

After the public comment periods are completed, GP shall prepare an Agency Review Draft Responsiveness Summary that addresses public comments. GP shall prepare two (2) copies of the

Agency Review Draft Responsiveness Summary and submit them to Ecology for review and approval, including one electronic copy each in Word (.docx) and Adobe (.pdf) formats.

After addressing Ecology's comments and after Ecology approval, GP shall prepare five (5) copies of the Final Responsiveness Summary and submit them to Ecology for distribution, including one electronic copy each in Word (.docx) and Adobe (.pdf) formats.