

Randal Friedman

Angela — The concern with a cleanup process reflective of our community's needs continues to grow. The Columbian did an editorial recognizing the importance of this cleanup and our City's future. Here's the link <https://www.columbian.com/news/2021/apr/12/in-our-view-camas-must-prepare-should-paper-mill-close/>

I have continued to review the Draft Agreed Order and draft Public Participation Plan and offer some additional requests and a refinement of my prior request for an Advisory Committee.

I must emphasize that these comments are mine alone. I'm thrilled our community will soon have its chance to voice their personal concerns and stories, but I am not speaking for them except as we collectively deserve a chance to make our case for a better Agreed Order and have meaningful participation in the long-term process.

FUTURE LAND USE IDENTIFICATION. I note with interest the requirement for the Remedial Investigation to consider "future land use." Certainly, given the value of this property, and past examples in our State; future land use cannot be limited to a paper mill as suggested by Georgia Pacific in the Post-Record. You've already heard differently from the CEO of our Port. The Columbian has joined the Post-Record in editorials beating this drum.

This shows additional need for the Advisory Committee amendment I submitted for inclusion in the Final Public Participation Plan.

Our community deserves a seat at the table when discussions turn to future land use, as required in the order. That is fundamental to the entire subsequent cleanup process. **REQUEST FOR PUBLICLY REVIEWED RESPONSE DOCUMENT.** When public comments close on the 23rd, what happens to these comments?

Is the public presentation, and subsequent hearing on the 20th, considered equivalent to a "draft document" and therefore triggers the requirement for a "published response"? Per the draft Public Participation Plan

Formal 30-day comment periods allow interested members of the public to comment on draft documents, legal agreements, and proposed cleanup actions...

Following a comment period, we publish all the input we received and respond to significant comments and questions. If the comments result in significant changes to the cleanup documents, then the documents will be revised and re-issued for public review. If the comments do not result in significant changes, then they become final. (emphasis added)

If this does fall under the requirements for a draft document, is that published response completed before the Order is signed by Mr. DeMay?

If available before signing the order on behalf of the State of Washington, can the public have at least a week to review a draft published response document prior to the Order being signed?

As a resident of Camas, and the State of Washington; I request the hearing and public comment period on the Camas Mill be considered part of a draft document process with its follow-up public response. Further, I request that I, and the elected officials who represent me copied on this email, have a chance to review a draft published response document. Given the many people likely to attend this virtual hearing, this will assure the State of Washington heard their concerns, and how they are reflected in the response.

OUR COMMUNITY SEEKS A SIGNIFICANT CHANGE. Giving the community a seat at the table, while perhaps obvious, is requesting a significant change. When the State of Washington makes a decision whether or not to include this Advisory Committee, within the governing cleanup order for the Camas Mill, our community deserves a chance to respond before it is signed on our behalf. Signed before our direct regulatory authority is taken away.

If this is not considered a draft document, and there will be no public response document with the opportunity for public review, I would request to know sooner rather than later.

Our community is only asking for what they would get if the mill were a military base. Will the State of Washington treat us below that standard?

I hope not.

LET'S NOT FORGET THE COLUMBIA RIVER AND OUR CITY'S HISTORY. The Post-Record article mentions past involvement of the Columbia Riverkeeper.

They sent a technical comment letter in 2015 concerning the Mill's NPDES permit. The letter identifies the mill as a significant pollution concern, and recognized the close connection between pollution sources on the mill property and the Columbia River. I've attached

it. <https://www.columbiariverkeeper.org/sites/default/files/2015/06/2015.6.16-Columbia-Riverkeeper-Comments-on-Camas-GP-Mill-NPDES-Permit-Renewal.pdf>

The article made me realize, in my hurriedness to comply with state legal requirements for a hearing, I had left something out. Let me explain.

The mill property has been the economic heart of Camas before its incorporation as a City. The future of this property largely determines if Camas's historic downtown declines with its mill shuttered, with business and new residents shifting up the hill to the exploding 192nd St Corridor in Vancouver.

See <https://www.columbian.com/news/2021/apr/11/vancouver-192nd-corridor-reimagined/>. We hope, on the other hand, this historic mill evolves into a new multi-use employment center taking advantage of its incredible location, schools, and business climate.

Concern for this community's well-being was my immediate motivation, and one shared by many. You've heard and read passionate comments of how this cleanup must honor this City's vision, started when the first paper mill was built, and now at cross-roads.

While fully respecting the value of the remaining paper line, and the jobs it creates, the reality for this community is once the package boiler is installed, and the old boiler decommissioned; there will be at least 10 equivalent city blocks of decommissioned buildings on our City's historic downtown district's border. That's only considering land north of an extension of 4th Avenue.

Nothing in what I have suggested, or in a proposal for an Advisory Committee, conflicts with the long-term continued operation of the remaining paper line. It recognizes that hundreds of acres of prime land directly adjacent to our downtown can be reimagined and planned consistent with those operations, if it is remediated from past contamination.

OUR PORT IS READY. Our Port has shown how it can manage shoreline property for manufacturing jobs, mixed-use development, and high standards of resource management, and public recreation all at once. I'm proud we have a public agency which actively recognizes the need to retain and develop manufacturing where humans work compatibly with the environment. Their recent plan, which involved environmental cleanup of a lumber mill, also provides for outstanding public connection to our river.

Continued mill operations can co-exist with future development. The remaining paper line is less than 60 yards from existing downtown businesses and the two have and remain compatible. Once again, nothing suggested implies otherwise.

It is exciting to see our Port ready to roll up its sleeves and get to work on implementing this Order through an Advisory Committee and the Interim Action process. I hope they get the chance.

ADVISORY COMMITTEE ADDITION. The Advisory Committee proposal I requested had an oversight. It should have had included the Columbia Riverkeeper as a stakeholder. I worked with their equivalents while the civilian representative to California for the US Navy and they were part of the process. Disclosure, I am one of their 8,000 members and supporters.

As important as this Order and cleanup is to the City and Camas and beyond, it is equally important to a stakeholder like the Columbia Riverkeeper. This property represents two miles of shoreline, not including islands like Lady Island. The opportunities, both for new recreational sites and restoring past contamination is without equal. It is important for ongoing efforts for the Columbia's protection in a world of coming climate change.

I included Riverkeeper's Executive Director on this email. They might find creation of an Advisory Committee a reasonable and necessary addition to the Public Participation Plan.

THE CONCEPTUAL SITE MODEL. The draft Order requires a "Conceptual Site Model" detailing how contamination may interact with the Columbia River. The expertise an NGO like the Columbia Riverkeeper could bring to the table, if they were so interested, is substantial.

I've attached a revised submittal for the Public Participation Plan. Please consider this my current request.

Beyond any individual stakeholder, this is an example of how a properly set-up and managed Advisory Committee has great potential to avoid future conflicts.

I trust everyone on this email agrees we should strive for an outcome that avoids conflict and delays where everyone loses. Everyone benefits from avoiding shuttered buildings on a property that keep deteriorating. I saw that sadness on all too many closed military bases in California.

OTHER STATE POLICY CONSIDERATIONS SUPPORT AN ADVISORY COMMITTEE. Potential reuse of significant portions of the mill could satisfy and implement other State of Washington goals for climate change, affordable housing, promotion of infill development and reduction of Vehicle Miles Traveled (VMT). It could also provide new conservation opportunities for the Columbia River.

Absent this opportunity for concentrated development, demand will shift to areas lacking downtown's access, utilities, and opportunities for sustainable infill development.

All the more reasons to bring people together through an Advisory Committee. Within this Committee's DNA is to identify and resolve clean up issues while it is easier to do so. It accomplishes this by identifying and respecting all interests in this area. This includes the greater interests of the State of Washington, championed nationally by our recently reelected Governor, on the necessity to incorporate climate change into every state action.

THE BASICS: EQUAL STANDING. I wanted to share some comment I made to the Camas City Council last week.

If you happen to live in Oak Harbor, the busy Naval Air Station Whidbey Island has a Restoration Advisory Board with the community's seat at their table. Puget Sound Naval Shipyard, 14,000 employees strong, had a community board until 2008. Remarkable when you consider these boards started in the early 90's. Massive Joint Base Lewis-McChord asked the community if they wanted a Board. The community decided not to.

They all had the choice. So should we. Even for ongoing operations. There's no "pass" for paper mills, whether active or largely shuttered. Just like there's no pass for the largest, and quite active military bases in our State.

The State of Washington should not give my community less standing than it would get from an active installation of the United States Navy, or other branch of our Armed Forces.

I have to believe my Governor would agree.

THERE MUST BE TRANSPARENCY. I did this for 32 years starting with true Superfund sites. There are so many incremental decisions that shape and focus a complex cleanup investigation. They start with the first meeting after this order is signed. These decisions include what, and to what extent, areas are investigated. Then, more meetings on how they are investigated. Still more meetings about sample results, and if more sampling is needed. More decisions decide what appropriate interim actions the state requires, if any. These are but a few examples.

These internal decisions are private under this draft Order. Until a 30-day review period at the end. Even for our city government.

This is wrong on so many different levels, the most significant of which is the demonstrated ability for an Advisory Committee process to work.

Thank you, Angela. I look forward to the Hearing on the 20th and an answer to the questions raised in this submittal.

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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, community-based organizations like the Downtown Camas Association and the Camas/Washougal Chamber of Commerce, and the Columbia Riverkeeper and other Non-Governmental Organizations (NGOs) DOE may find appropriate. 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.

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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.