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1. The proposed timeline for the remaining cleanup is unacceptably long. The Scott Paper Mill cleanup in Anacortes – same industry, similar contaminants - took about five years from beginning to end. In 2000, an Ecology official said the clean-up would take another four to six years. 25 years later Ecology is giving an estimate of up to an additional 10 years.

With all the studies and preparatory work already done, there is no technical reason the cleanup could not be completed in well under five years. Rayonier so far has fulfilled all of its legal responsibilities with respect to the clean-up, and the Action Plan should not be punitive towards Rayonier. However, Rayonier received an excellent financial deal from Ecology's forbearance, being able to postpone the bulk of the cleanup cost by already 28 years.

Rayonier should be informed now that the cleanup must proceed on an expedited schedule, or else Ecology will declare them noncompliant and conduct the cleanup itself using funds from the Hazardous Substance Tax, pursuing recovery of the costs from Rayonier. The citizens of Port Angeles deserve no further delay in restoring this important part of their waterfront.

2. The upland cleanup timetable should not be tied to the marine cleanup if the latter takes longer, so that the land portion of the cleanup area can be sold by Rayonier and placed back into productive use as soon as possible.

3. The Natural Resource Damage Assessment (NRDA) process should not delay the cleanup, nor prevent Rayonier from being incentivized to eventually make the property available for productive use again. Any Ennis Creek related restoration projects should not delay the conclusion of the upland area cleanup.

4. Rayonier should not be incentivized to never sell the property by being offered NRDA credits with a value in excess of the property's market value once cleaned up, for ceding the property for a nature or cultural preserve. Ecology cannot force Rayonier to sell the cleaned-up property, but it can make certain that eventually selling it is in Rayonier's economic interest.

5. Ecology should choose the SL5 option for the cleanup. Capping 10 acres of the site, fencing it off, and monitoring it for decades, as SL3 would require, would make any sale of the property and future development extremely difficult, if not impossible, particularly if Ecology needs to approve any construction on that site.

As a former board member of the Port Angeles Harbor Works Public Development Authority, I want to dispel the narrative that Harbor-Works failed because it was concluded that the Rayonier property would never have any commercially valuable use once cleaned up. This was not the case. The Rayonier property could be an important engine for the economy of the City of Port Angeles, with a tribal cultural center, such as proposed by the Jamestown S'Klallam Tribe, an Anthony's Restaurant, a marina, light marine industry, or many other alternative potential uses.

Harbor-Works failed because with the glacially slow pace of the cleanup and Ecology's inability or unwillingness to place pressure on Rayonier for a prompt cleanup, Rayonier had no incentive to make a deal involving a quick cleanup. A dollar spent today is worth much more than a dollar spent 20 years from now. 16 years later, things have worked out exactly as Rayonier had hoped when Harbor-Works failed – it has not yet had to pay the tens of millions of dollars for the cleanup and under the current schedule would not have to do so for many years.

There is room on the Rayonier site both for conservation, such as restoration of Ennis Creek, public access and recreation, and productive use resulting in the jobs, housing, and tax revenues so needed by our community.