

Catherine Ford

I wish to express concerns regarding the current cost-benefit analysis and selection of SL3 as the preferred cleanup solution overseen by the Department of Ecology (DOE) and consultants hired by Rayonier.

It appears that DOE's oversight of the cost and benefit estimates has been insufficient. The DOE has stated that the law (RCW) requires SL3 to be selected due to its cost-benefit ratio. However, a detailed review shows that SL3 costs have been understated, while SL5 costs have been overstated by approximately \$27 million, resulting in a skewed preference toward SL3.

Key cost components for SL3—including permitting, design, modeling, ongoing maintenance, monitoring by Rayonier, coordination with sediment cleanup, and addressing potential toxicity in untested sediments—are either underestimated or omitted. At the same time, SL3's benefits seem inflated, with important liabilities such as damage to the capped toxic soil and costs related to sea level rise and extreme weather not reflected.

The analysis does not account for significant economic impacts, such as lost tax revenue or other consequences from environmental damage. This narrow focus limits a full understanding of the true long-term costs.

SL5's cost estimates include questionable expenses such as a \$75,000 restrictive covenant preparation charge, which should not be included, and unusually high non-construction costs compared to SL3, undermining the accuracy of the analysis.

From an environmental perspective, the valuation fails to include crucial ecosystem services—such as fish, salmonids, and estuary health—that are essential and currently impaired. This omission undervalues the importance of a permanent cleanup.

SL3 is more complex than represented, requiring physical barriers, signage, decades of monitoring, environmental covenants, and ongoing maintenance—responsibilities that Rayonier will bear long-term. Yet, this complexity is underappreciated or ignored in the scoring, while SL5, which uses proven excavation and transfer techniques, is undervalued.

Important considerations such as compliance with the Comprehensive Plan, resilience to ongoing and future environmental challenges, and maintenance costs are missing from the evaluation but are critical for a sustainable solution.

For the benefit of the local environment, community, future generations, and Rayonier itself, I urge that SL5 be reconsidered as the preferred cleanup option. It offers a permanent, more straightforward, and reusable property outcome, aligning better with public interest and long-term environmental stewardship.

Thank you for your attention to these important issues. I respectfully request a thorough re-evaluation of the cost-benefit analysis and selection process to ensure the most effective, permanent, and economically sound cleanup solution is chosen.