Julie Hatch

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 told us the clean up would take four to six years. 25 years later we are given an estimate of 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 received an excellent financial deal from Ecology's forbearance, being able to postpone the \$30 million cleanup cost by already 28 years. They should be informed now that the cleanup must proceed on an expedited schedule, or else Ecology will declare them unable to carry out the clean up as required 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 the centerpiece 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. And, importantly, 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.

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 that involved 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 \$30 million for the cleanup and under the current schedule would not have to do so for many years to come.

I have lived in Port Angeles since 1988 and every time someone from Ecology speaks we see almost the same slides and hear the same story "another 7-10 years" I will likely be dead before it

gets closure!!! PLEASE, take a stand for our community and demand that this is completely resolved (cleaned and ready for development) in the 5 years!!! Thank you