

Tammy Hueter

I have recently become aware that Rayonier is responsible for the hiring of consultants who estimate the costs of preferred solutions and is overseen by the Department of Ecology (also known as the DOE).

I believe DOE to be negligent in their oversight of costs and benefits estimates.

The DOE informed us that SL3 had to be the choice because the cost-benefit ratio was too high, and this was "the law," an RCW over which they had no control. The fact that the estimated costs have been minimized in SL3 and exaggerated in SL5 results in a differential of \$27 million, which forces SL3 to be the preferred solution by the letter of the law.

After further examination of the cost estimates of SL3, several areas are underestimated and incomplete, for instance, permitting, design and modeling, maintenance, repairs, and monitoring (to be done by Rayonier), plus coordination with sediment work and potential toxicity of untested sediments beneath the current dock as well as unknown protocols necessary for that remediation. The benefits have been estimated too high and the costs too low for SL3.

How much will it cost when there is damage to the 10-acre capped toxic soil along the waterfront? There's no modeling for loss of taxes, economic benefits, acts of God, along with sea level rise in these estimates.

SL-5 estimates are higher than expected. Engineering is not as complex, economy of scale, erroneous \$75,000 restrictive covenant preparation cost included (which should not be there), and non-construction cost of \$6.25 million higher than for SL3, which seems inaccurate as well.

For the benefit of Rayonier, future generations, and the restoration of the estuary and creek, the cleanup should be permanent.

SL5 is permanent and allows property reuse.

How is it possible that in these cost-benefit ratio estimates, there's no financial accounting for the fish, salmonids, and the estuary that is no longer available to them, yet essential to their survival? SL3 is much more complex.

It involves fencing, signs to limit access, 30 years of post-construction monitoring, an environmental covenant, and a commitment to maintenance by Rayonier.

It should be easy to build, yet SL5 is underscored at 6, as excavation, loading, and transfer are well-known technologies.

On the other hand, SL3 has been over-scored at 9 with complex engineering for erosion-proof 7-foot (possibly more, depending on sediment findings) fenced 10-acre mound, considering sea level change, inclement weather, and an environmental covenant are the factors NOT being considered in this over-scoring of SL3.

Compliance with the Comprehensive Plan is not considered in estimates.

We need a PERMANENT resilient solution and consideration of modeling and repair challenges to design, construct, and maintain the consolidation area. The cost estimate must recognize that SL3 is more complex and will cost more than SL5 to design and maintain.

These discrepancies and oversights make it clear that SL5 is the actual correct choice of preferred solutions.

We request that SL5 be the preferred and permanent solution to this long-delayed toxic cleanup.