

## Port Angeles Waterfront District (Sam Grello)

The Port Angeles Waterfront District is officially asking that the Department of Ecology change their apparent recommendation of the proposed cleanup option from SL-3 (permanent consolidation of contaminated materials onsite) to SL-5 (complete removal of contaminated materials).

After attending the Department of Ecology's local presentations on 7/8/25 at Field Hall and 7/15/25 at the Port Angeles Business Association meeting, we understand why the Department of Ecology favors Option SL-3 over Option SL-5. Marian Abbett did a good job presenting the Department of Ecology's decision-making process. According to the Department of Ecology's analysis, Option SL-5 appears prohibitively expensive for the polluter, Rayonier, and SL-5 received only a slightly higher overall benefit score in their analysis than Option SL-3. The Department of Ecology used a Disproportionate Cost Analysis to make this determination.

In our opinion, the Disproportionate Cost Analysis needs to be re-evaluated, and we ask that the Department of Ecology do so in good faith before moving forward with this process. More data is required to determine and compare actual cleanup costs.

We also attended an additional meeting about the Rayonier Mill Clean Up, hosted by the City of Port Angeles. The City hired Nicole Ott, Integral Consulting, to review the recommended cleanup plan (SL-3) and give a presentation. In her presentation, Ms. Ott highlighted some of the inaccuracies in the cost estimates for both SL-3 and SL-5 options, as well as some seemingly unconsidered factors. For example, was the opportunity cost in loss of tax revenue and other economic benefits considered? Under the recommended SL-3 option, the land would be cleaned up to "unrestricted use cleanup level," however, restrictive environmental covenants will be placed on the site due to the cap, limiting the use of that land forever. If the State claims that the additional \$27 million for Option SL-5 is too expensive for the polluter to clean up, no one ever will, and the Department of Ecology is creating the State's prettiest toxic dump. The costs to design and build the cap are loosely understood; the numbers used are very vague in the plan and SL-3 is likely to cost more. Since these costs are what the Department of Ecology used to recommend the cleanup plan, we ask that the Department do better in assessing these costs. The cost estimates for design should match the complexity of this project, rather than based on loose estimates. But currently the design cost estimates use vague percentages tied to estimated construction costs. This is likely an underestimate due to both methodology AND the current rate of inflation.

Our membership and our community are understandably riled about this and very frustrated. Please reconsider the cleanup option you seem to be recommending. Like any community would, we want and deserve a permanent solution to this toxic site in the form of a complete removal of contaminated materials. Allowing the polluter to leave behind the contaminated materials they brought is not a solution; and therefore SL-3 is not an acceptable option.