

Nils Andermo

While I believe that several of the benefit scores are much too high for SL3 and too low for SL5, my comments will focus on what I see as completely missing benefit criteria, and the related costs.

Usability of land:

Where is the benefit criteria for the usability of the land? This is prime waterfront location in Port Angeles along the popular Olympic Discovery Trail. In addition, there is already a road leading down to the property from above the bluff.

SL3 would result in a 10-acre fenced off, permanently polluted, keep-out area whereas SL5 would allow for redevelopment of the whole property in accordance with the Comprehensive Plan.

The missed economic value of fencing off 10 acres needs to be estimated and included as a cost for the SL3 plan. At the very least, Rayonier should be required to lease the fenced off property from the City of Port Angeles at fair market value, for the entire time that it cannot be used for other purposes.

Long-term monitoring and maintenance:

The criteria "Technical and administrative implementability" is scored 9 and 6 for SL3 and SL5 respectively. This seems flipped as containing the pollutants surely must be more technical and require more administration than digging it up and hauling it away. With a score of 9 for SL3, it absolutely cannot include long-term monitoring and maintenance.

And why is the cost of monitoring and maintenance in SL3 limited to 30 years?