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December 1, 2006

Re: *Draft Remedial Investigation for the Uplands Environment of the Former Rayonier Mill Site.*

The City hired an independent firm to assist us in evaluating the RI. In a special open session of City Council, the full Council was presented an overview of the RI, the draft Comments prepared for the City by Exponent, and engaged in an thorough discussion regarding the Rayonier site, the long delayed release of the RI, and the future potential redevelopment of that property. Attached to this letter are Comments prepared at the request of the City of Port Angeles. City Council and Staff have reviewed both the RI and the comments prepared at our behest. We are submitting both this letter and the attached Comments to you as the City's official comments on the *Draft Remedial Investigation for the Uplands Environment of the Former Rayonier Mill Site.*

In submitting these comments the City's interest is to protect the citizens of Port Angeles. The City hopes to accomplish that, first, by ensuring that the remedial investigation uses the appropriate and correct methods so that it accurately identifies conditions that might be harmful to people or the environment. The City hopes to accomplish that, second, by ensuring that the remedial investigation uses the appropriate and correct methods so that it does not imply health concerns not indicated by the scientific evidence and does not suggest unwarranted negative consequences for citizens.

Bear in mind that these comments on the RI truly represent a wholly independent review of the RI. The consultants who prepared them are highly respected in their respective fields of expertise. In that light two points merit special attention:

A. It should be noted that these comments on the RI, independently prepared by three respected scientists, are NOT critical of the overall approach used in preparing the RI. Thus we believe that the RI should be considered to be substantially consistent with the best theoretical and applied science currently available after the issues identified in our comments have been addressed.

B. These comments appropriately note specific issues or locations that require further analysis or clarification. As noted in the comments, at those specific locations there may need to be future reviews conducted by a potential purchaser or redeveloper of the site to

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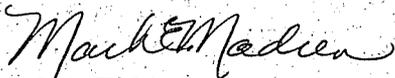
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fully characterize conditions after the interim cleanup actions, relative to proposed final uses of the site and appropriate cleanup

Finally, I would like to note that while this Draft RI is an important hurdle in restoring this site to being a valuable asset to the community, it is only one step. Moving from this point forward, we believe there must be a much stronger emphasis placed on integration of final site redevelopment and use planning with the regulatory oversight of brownfield restoration.

If you have any question that you would like to discuss, please feel free to contact me.

Very truly yours,



Mark E. Madsen  
City Manager

Enclosure included