

January 10, 2025

Mr. James DeMay, P.E.  
Industrial Section Manager  
Washington State Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

**Subject:       Agreed Order No. 18201, Georgia Pacific Consumer Operations, LLP  
Site Cleanup Process and Draft Remedial Investigation Work Plan**

Dear Mr. DeMay,

The City of Camas (City) has been closely following the Agreed Order and Remedial Investigation Work Plan development process between the Department of Ecology (Ecology) and Georgia Pacific Consumer Operations, LLP (GP). The City understands the clean-up process is a legally binding order between Ecology and GP that is outside of the City's direct control and will likely take decades to come to fruition; however, for multiple reasons as outlined below, the City remains invested in the process and desires the best possible outcome for the Camas community.

The City deeply values the role the GP Camas Mill has played in our history and recognizes its continued significance as an economic driver. However, as we look to the future, it is also critical that we take steps today to secure the broadest range of possibilities for this key property.

The GP mill occupies approximately 660 acres in the heart of the City of Camas, roughly 7% of the City's current total land area. Much of the surrounding property is residential and includes mixed-use and commercial property and parks. The GP property is one of the primary gateways into the City and is immediately adjacent to our historic and vibrant downtown and is also located on the shores of the Washougal and Columbia Rivers. Given the site's legacy and its importance to our community, it is imperative to ensure the cleanup efforts are fully protective of human health and the environment and preserve future private and public redevelopment options including the flexibility needed to support a broad range of future uses from residential and commercial development to natural and recreational spaces.

Per the City's Comprehensive Plan and Zoning map, the site is currently zoned "Heavy Industrial," which supports industrial uses such as GPs current operations but also includes a wide range of commercial and recreational uses. For example, this zone today would allow new retail amenities, restaurants, medical clinics, professional offices, schools, and recreational amenities, including parks, trails, libraries, and museums, to name a few. Based on our understanding of Ecology's cleanup and decision-making process, we believe moving towards an unrestricted cleanup level would ultimately be warranted based not only on the current zoning but the desire

Mr. James DeMay  
Department of Ecology  
January 10, 2025  
Page 2

to complement and enhance the surrounding community, provide for the greatest flexibility of uses in the future, and to safeguard public health and environmental quality. By contrast, an “industrial cleanup” designation (something other than unrestricted) could significantly limit the site’s future development potential and likely preclude residential or natural area uses, restricting the ability to adapt to changing community needs.

The current Draft Uplands Remedial Investigation Work Plan (3<sup>rd</sup> Draft, June 14, 2024) states on page 63 that *“For most sites and constituents, MTCA Method B provides the screening criteria protective of unrestricted land use; however, as presented in the Guidance for Remediation of Petroleum Contaminated Sites (Ecology 2016), MTCA Method A provides this information for petroleum hydrocarbons.”* The draft plan goes on to state that *“For the purpose of this RI WP, screening levels consist of...”* MTCA Method B for both Soil and Groundwater. The City is in full support of using Method B, unrestricted land use cleanup levels for investigative screening purposes.

We would also like to take this opportunity to highlight a couple of concerns regarding statements made in Section 4.1, page 63 of the Draft RI WP regarding the cleanup levels.

- In the first main bullet point under “Soil”, the plan states, *“Based on City of Camas zoning, the Mill Property meets the definition of an industrial property.”* The word industrial can have different meanings depending on context. As stated above, the City’s “Industrial” zoning allows for many, many more uses than heavy industry, such as the current use by GP. That’s contrary to “industrial cleanup levels” that might typically be more associated with the MTCA Method C or less stringent cleanup standards and significantly limit future uses on the site. Further, industrial cleanup levels do not apply if the Site is in close proximity to residential or mixed use properties.
- In the second main bullet point under “Groundwater”, there is a statement of *“Generally, MTCA Method B requires that groundwater cleanup levels equate to (COPC) concentrations protective of drinking water beneficial uses unless groundwater qualifies as non-potable”* and that *“Groundwater underlying the Mill Property is not used as drinking water.”* We understand the context of these statements and appreciate that Method B will be used for screening levels for purposes of the RI WP. However, we also want to remind Ecology that the City’s primary drinking water sources are groundwater wells located along the shoreline of the Washougal River upstream of GP’s site. GP has not performed groundwater sampling or modeling to our knowledge, and Ecology has not made a “non-potability” determination. If the groundwater remedial investigation work identifies any

Mr. James DeMay  
Department of Ecology  
January 10, 2025  
Page 3

Constituents of Potential Concern (COPC), especially any that appear to have migrated off-site via groundwater, MTCA Method B should continue to be used in the development of the Cleanup Action Plan requiring cleanup levels to drinking water beneficial uses to protect the availability and use of groundwater for the community.

By requiring an unrestricted cleanup level not only for RI WP screening purposes but ultimately in the Cleanup Action Plan, Ecology can help preserve the ability for both GP and the City to establish a future vision for the site to support diverse and innovative redevelopment that benefits our local community and the wider region. Additionally, we should all work together to ensure the site supports Shoreline Management Act policies for preferred uses, environmental protection, and public access.

We understand the defined Cleanup Process through the State is complicated and takes many years, if not decades, to complete, especially on an active, profitable business site that GP intends to continue operating into the foreseeable future. We also understand that Ecology and GP are in the very early stages of the process and recognize that the Yakama Nation is not only following the process but also providing critical review and input on documents from a governmental perspective. The time required for these types of complex processes can be daunting and frustrating for those on the outside. However, the City can appreciate the efforts of all involved and understand, for example, that since the signing of the Agreed Order in August 2021, Ecology and GP are still developing the Remedial Investigation Work Plan (currently in its third draft), which upon finalization will only identify initial screening levels to investigate potential contamination on the site - and that the formal decision regarding actual cleanup levels in the Cleanup Action Plan is many years and many process steps away.

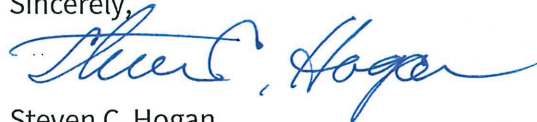
The City will continue to follow and support the process and do what we can to communicate its complexities to the public. There are many in the community following the process, and we anticipate Ecology will continue to look directly to the City as the authority concerning Comprehensive Planning and Zoning designations, as well as the local agency having concurrent jurisdiction over water resources, including drinking water, stormwater, shorelines, and other environmental resources within the City limits. As part of the process, the City will engage in the public participation plans, which are otherwise mandated as the matter moves forward.

Again, the City remains committed to supporting Georgia Pacific and Ecology in this crucial endeavor through the years to come. GP's continued operation has always been, and remains, an important part of the Camas community. We want to continue supporting their economic vitality while balancing the community's aspirations for a vibrant and sustainable future. We appreciate Ecology's guidance and partnership as we continue navigating this complex process.

Mr. James DeMay  
Department of Ecology  
January 10, 2025  
Page 4

Should you have any questions or need additional information from the City, please do not hesitate to contact me.

Sincerely,



Steven C. Hogan  
Mayor

Cc: Jon Busby, Mill Manager, Georgia Pacific  
Kristi Ward, Public Affairs Manager, Georgia Pacific  
Caroline Mercury, Chair, GP Mill Clean-Up Community Advisory Group