

V_1.29 | Letter to Mayor Amy Howard

Sent Tuesday, June 9, 2026, 8:00 AM Pacific Time — To: ahoward@cityofpt.us — Cc: John Mauro, City Manager (jmauro@cityofpt.us) — Bcc: Jim Surgent

Dear Mayor Howard,

Thank you for your thoughtful and substantive reply. I want you to know that it was genuinely appreciated. You engaged with the substance of my concerns rather than offering a form response, and that matters to this community and to me personally. I also appreciate the candor about what the city can and cannot do — that kind of clarity is far more useful than ambiguity.

I will be at the Local Emergency Planning Committee meeting next month. Your note that there has been no public attendance in two years of active meetings — at a moment when eleven people have just died at a facility operating the same equipment as Port Townsend Paper Company — is itself a statement about how much work remains to be done. I intend to change that. I would welcome any guidance you can share on how to most effectively participate, and whether written comments submitted in advance carry any weight with the committee.

One additional question on the LEPC: who currently holds the community voting seat? If that position is vacant, I would like to understand the process for applying. Given the work I have been doing on this issue, I believe I could contribute meaningfully to the committee's work, and I would welcome the opportunity to do so in an official capacity.

On the matter of the public record: I have spent several weeks assembling a substantial body of documentation — drawing on Washington State Department of Ecology enforcement records, federal Agency for Toxic Substances and Disease Registry findings, EPA compliance data, discharge monitoring history, and publicly available company records — and have sent formal letters to more than forty federal, state, county, tribal, and local recipients. I would be grateful if you could advise me on the correct process for submitting this material into the City Council's official record. I would also welcome the opportunity to share it directly with you for your review. I believe it would be useful context for the OGWS rate review and for the City Council's broader understanding of this issue.

On the Olympic Gravity Water System rate review, I understand from your reply that making my comments part of the official record requires participation in person, via Zoom, or through the city website rather than email. I will follow that process. Please let me know approximately when that item will come before the council so I can plan accordingly.

I also have several specific questions about the OGWS contract that I am hoping the city can help me answer, either directly or by pointing me to the right public records:

First, I would like to read the complete executed water supply agreement between the City of Port Townsend and Port Townsend Paper Company. I understand a December 2021 agreement is on file. Is that document available for public review, and if so, where can I access it?

Second, I am trying to understand the full financial history of the OGWS relationship. As far back as records are available, how much has the city spent on repairs, maintenance, and capital improvements to the system, and how much has Port Townsend Paper Company contributed? I recognize this may require a public records request and I am prepared to file one if that is the appropriate path.

Third, what legal criteria govern the city's ability to adjust rates under the current agreement? I want to understand what the city is and is not legally empowered to consider when setting water rates — including whether environmental and safety compliance performance can be factored in.

Finally, I want to make sure I am working from accurate figures. My current estimate is that Port Townsend Paper Company draws approximately 3.5 billion gallons of raw water per year from the OGWS system. Can you confirm whether that figure is in the right range, or point me to where the actual usage data is published?

Mayor Howard, I understand that the city's direct legal authority over Port Townsend Paper Company is limited. The facility sits in unincorporated Jefferson County and the city cannot compel inspections, set permit conditions, or enforce environmental regulations. You have been honest about that and I respect it.

But I want to speak directly to something your role makes possible that no regulation can replicate: your voice. The Mayor of Port Townsend speaks on behalf of this community. That voice carries weight with regulators, with the press, with state legislators, and with the public — weight that a private citizen writing letters cannot match. You have the ability to call for enforcement of existing regulations, to reach out directly to the Washington State Department of Ecology, the Washington State Department of Health, and the United States Environmental Protection Agency, and to make clear that the people of Port Townsend expect those agencies to do their jobs. Protecting the health of your constituents is not outside your authority — it is the very heart of it.

A public statement, an interview, or a letter from the Mayor of Port Townsend stating your commitment to improving the health and environment of this city — and your intent to shed light on the risks being imposed on this community by Port Townsend Paper Company and its owners — could move this issue in ways that years of private advocacy cannot. I am not asking you to take sides against the mill or against the workers who depend on it. I am asking you to stand on the side of the people who breathe this air and swim in this bay.

Port Townsend Paper Company's compliance record is, by any honest reading, poor. Three formal enforcement actions in fewer than seven weeks this spring: an Administrative Order on April 17, a Notice of Violation on May 18, and a second Notice of Violation on June 4, 2026, documenting six permit exceedances for discharge of total suspended solids and biochemical oxygen demand caused by black liquor spill events on April 7 and April 10 — 46 to 49 days before eleven workers died at a facility running the same process in Longview, Washington. Thirteen documented spills into Port Townsend Bay since 2013. And its owner, Atlas Holdings of Greenwich, Connecticut, has accumulated more than \$108 million in penalties across 143 violation records since 2000, according to the Good Jobs First Violation Tracker (violationtracker.goodjobsfirst.org/parent/atlas-holdings).

I ask you to join me in doing everything within your power to address the poisoning of our waterways and our air, and the risks posed by a company with this record of non-compliance. If regulators were fully enforcing the rules that already exist, how many more enforcement actions would be required? That is a question this community deserves to have answered — and your voice is one of the most powerful tools available to ask it.

I will close with a thought I hope is useful. Port Townsend Paper Company draws raw water from the Olympic Gravity Water System, processes it through its kraft pulping operation — where it comes into contact with white liquor, black liquor, and a range of toxic industrial chemicals — treats that water, and then discharges approximately 3.5 billion gallons of treated toxic carcinogenic wastewater into Port Townsend Bay every single year. That figure is documented in the facility's own discharge monitoring records submitted to the Washington State Department of Ecology under its National Pollutant Discharge Elimination System permit (May 2025).

To put that volume in terms anyone can picture: imagine a standard one-gallon milk jug. Now fill it not with milk, but with treated wastewater confirmed by the company's own state-issued permit to contain cancer-causing chemicals — benzo(a)anthracene, chlordane, and pentachlorophenol — with no enforceable limits until 2029. Now imagine 3.5 billion of those jugs. Stacked end to end, they would reach the moon and back 1.1 times. Emptied into the bay through a garden hose at ten gallons per minute, it would take 667 years. If every person in the United States poured their share, each would pour 10.6 gallons.

This is not happening over 667 years. This is happening every single year. Our children swim in that bay. Our Dungeness crab come from that bay. The fish can't type, so I am typing for them.

Any guidance you can offer on my broader mission of improving the air quality and waterways of Port Townsend would be deeply appreciated. I believe we share that goal, and I am grateful for your time and your engagement.

I would very much welcome the opportunity to meet with you at your convenience.

Respectfully,

David Ginsberg

[REDACTED]

Port Townsend, WA 98368

[REDACTED]

davidbginsberg@gmail.com

cc: John Mauro, City Manager — jmauro@cityofpt.us