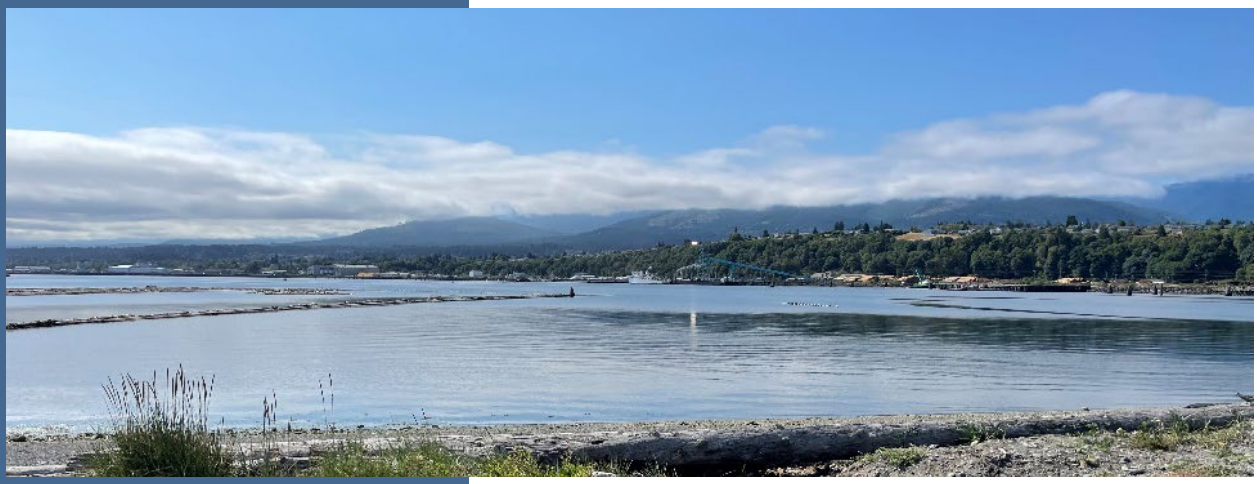

Responsiveness Summary

Western Port Angeles Harbor

Cleanup Site ID: 11907
Facility ID: 18898
Address: Port Angeles Harbor
County: Clallam

This report was prepared by:

Connie Groven, P.E.
Unit Supervisor and Site Manager

Abby Zabrodsky
Public Involvement Coordinator

Toxics Cleanup Program
Southwest Region Office
Lacey, Washington

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Contact Information

Toxics Cleanup Program - Southwest Regional Office

Connie Groven, P.E.
Unit Supervisor and Site Manager
360-584-7037, Connie.Groven@ecy.wa.gov

Abby Zabrodsky
Public Involvement Coordinator
564-250-0561, Abby.Zabrodsky@ecy.wa.gov

Physical location: 300 Desmond Drive SE, Lacey, WA 98503
Mailing address: P.O. Box 47775, Olympia, WA 98504-7775
Phone: 360-407-6300
Website: Washington State Department of Ecology[1]

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[1] www.ecology.wa.gov/contact

Contents

2025 Public Comment Period Summary

Ecology held a public comment period for the Western Port Angeles Harbor cleanup project from January 16 to February 18, 2025. During this period, Ecology also hosted a public meeting and an open house event. This event took place at the Field Arts & Events Hall on February 5th, 2025, from 6:00-8:00 PM.

Ecology held this public comment period to gather feedback on three documents that will move the project into its next phase of cleanup. A summary of these documents is below:

- **Consent Decree**: A legal agreement between Ecology and the parties participating in the cleanup at the site. It explains expectations for how the cleanup will happen and requires the participating parties to follow Ecology's Cleanup Action Plan. After it is filed with the Superior Court, the agreement becomes a formal court order. The potentially liable parties that have signed this legal agreement are:
    - City of Port Angeles
    - Georgia-Pacific LLC
    - Merrill & Ring
    - Nippon Paper Industries USA Co., Ltd
    - Owens Corning
    - Port of Port Angeles
- **Cleanup Action Plan**: Explains how the potentially liable parties will clean up the site under Ecology supervision. It includes the schedule, standards, and cleanup requirements.
- **State Environmental Policy Act (SEPA) documents:** Outlines environmental impacts that may occur from cleanup. Ecology determined the proposed cleanup is not likely to cause significant harm to the environment.

During the public comment period, **we received 18 comments**.

Overview of Ecology's Review of Comments

Ecology has reviewed and considered the public comments received on the Consent Decree, Draft Cleanup Action Plan, and State Environmental Policy Act (SEPA) Determination and Checklist. Based on our evaluation of the comments, we determined that only editorial changes to the documents were necessary.

Changes to the Cleanup Action Plan include:

- removing the word "draft" from the title pages,
- removing the word "draft" from Figures 1.2 and 4.1,
- changing the date of the final version to May 2025, and

- updating the date in the footnotes.

Changes to the Consent Decree include:

- updating the program manager signature block for the Toxics Cleanup Program from Barry Rogowski to Nhi Irwin,
- updating the Attorney General signature block from Robert W. Ferguson to Nicholas W. Brown, and
- added a second Assistant Attorney General, LeeAnne Kane, to the Attorney General signature block.

Cleanup Next Steps

Next, the potentially liable parties will create the cleanup engineering design. This step of the cleanup process will include more sampling to refine the boundaries for cleanup elements, such as shoreline excavation areas and sediment cap locations. This stage also includes logistics such as permitting and contracting. We expect engineering design to take about 4 years. This timeline is due to the cleanup's complexity and size, and the length of different permitting processes.

You can review the steps of Washington's cleanup process in Figure 1 (below). For more information, visit Ecology's cleanup process webpage.[2]

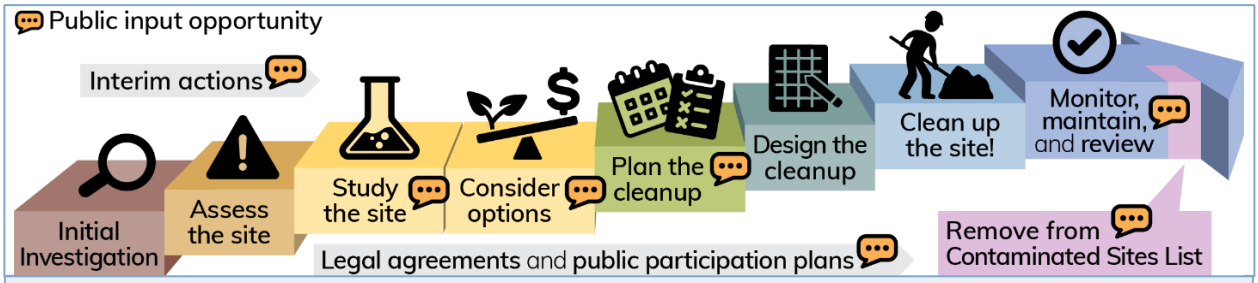

Figure 1: The steps of Washington's cleanup law. The Western Port Angeles Harbor cleanup is proceeding to the "design the cleanup" step.

Ecology will approve the final design before cleanup construction moves forward. After approval, the final Engineering Design Report will be publicly available on Ecology's Western Port Angeles Harbor cleanup webpage.[3] More information on how the public can be involved with future steps of the cleanup can be found in the Public involvement section of this responsiveness summary.

[2] https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process
[3] https://go.ecology.wa.gov/11907

We will keep the public informed as the cleanup progresses. To receive Ecology updates regarding the Western Port Angeles Harbor cleanup, you can:

- Subscribe to Ecology's Port Angeles Cleanups email notification list.[4] We use this list to send out email updates on our cleanup work in Port Angeles. We also send out information on outreach events Ecology may be attending in the area.
- Sign up for updates on Ecology's Western Port Angeles Harbor cleanup webpage.[3] Subscribers receive a weekly email whenever there's an open comment period, a new document, or other cleanup news. You can read more about this new tool on Ecology's blog.[5]

[4] https://go.ecology.wa.gov/subscribePA
[5] https://ecology.wa.gov/blog/may-2025/updates-on-cleanup-sites-in-your-inbox

Response to Public Comments by Topic

We appreciate the time people took to submit their thoughtful comments during the comment period. We carefully considered each comment while conducting our review.

In the following section, we've provided our responses to the concerns expressed. The goal of our responses is to answer questions, provide context, and to document the decisions made following public comments.

We grouped the comments we received into major topics of concern. Appendix A, page 28, contains a table summary of the comments and the comments in their original format.

Major topics of concern

- Cleanup levels
- Remedy selection
- Remedy logistics
- Remedy longevity
- Potential impacts on selected remedies from other Harbor projects
- PFAS
- Sampling and ongoing monitoring
- Construction logistics and impact
- Costs and accountability
- Restoration and ecological habitat
- Public involvement
- Public warning and signage
- Tribal and government coordination
- No cleanup needed
- Administrative notes on documents

Cleanup levels

Two commenters raised concerns about the adequacy of proposed cleanup levels and their long-term impact. They asked if the cleanup uses the most recent scientific standards to determine cleanup levels. They also emphasized the need to consider long-term cumulative effects. One commenter also questioned the appropriateness of hill-topping and interpolation methods to modify cleanup criteria. They also raised concerns regarding additional contaminants of concern.

Response

Cleanup standards

The cleanup will follow the most current cleanup standards available. Specifically, the cleanup will comply with the Model Toxics Control Act (MTCA) Cleanup Regulations (Chapter 173-340 WAC[6]) and the Sediment Management Standards (Chapter 173-204 WAC[7]).

We developed the Cleanup Action Plan to ensure that all remediation work meets these state-mandated requirements. While earlier cleanup levels were used as preliminary screening values, the final cleanup standards were established using the most up-to-date regulatory values available at the time of the plan's finalization. All site data has been evaluated against these final cleanup standards.

Cumulative effects

We consider cumulative effects when we determine the cleanup levels. Cleanup levels are established after considering:

- Risk-based concentrations for each chemical of concern, including risk to the benthic community and risks to human health and higher trophic level species.
- Regional and natural background levels – we can't set cleanup levels lower than levels found naturally in the environment. We also consider regional background levels caused by diffuse sources, such as atmospheric deposition or storm water that is not from a local, identifiable source.
- The practical quantitation limit (PQL) – this is the lowest concentration that the labs can reliably measure. We cannot set cleanup levels lower than what we can measure in the lab.

The risk-based concentrations of each chemical are adjusted downward to account for cumulative effects. Then we consider background concentrations and PQLs before setting cleanup levels. Because the risk-based concentrations of many chemicals of concern are very low, our cleanup levels are often based on natural or regional background concentrations. Ecology evaluated preliminary cleanup levels, including adjustments for

[6] https://app.leg.wa.gov/wac/default.aspx?cite=173-340
[7] https://apps.ecology.wa.gov/publications/summarypages/1309055.html

cumulative effects, in the Western Port Angeles Harbor Remedial Investigation/Feasibility Study Part 1 RI (RI/FS Part 1; Floyd | Snider December 2020).[8] These values were still up-to-date and are included in the Cleanup Action Plan as the final cleanup levels in Table 3.1.

Bioaccumulative effects

Some of our cleanup levels are set to protect the animals living in the harbor and humans who may consume these animals from bioaccumulative effects. Bioaccumulation is when hazardous chemicals build up in their bodies. As larger animals eat smaller animals, the chemicals accumulate in greater amounts.

Hill topping

Neither hill topping nor interpolation changes the cleanup level. They are just tools to help plan where different remedial actions are used. Since fish and some shellfish move around, they are exposed to an average concentration of the sediment throughout the area. Remediating areas with high concentrations will bring down the average concentration, therefore we calculate which areas of higher concentrations (or "hills") we need to remediate to bring the average concentration down to the cleanup level. The process of calculating which areas of higher concentrations need remediation is called hill-topping. We remove those "hills," or areas of higher concentration, to bring the surface-weighted average concentration (SWAC) down to the cleanup level. Interpolation helps estimate what the concentrations are between sample points.

Indicator hazardous substances

One commentor asked if we reviewed USEPA Region 10 findings. The comment is likely referring to the USEPA Region 10 Expanded Site Inspection (ESI, E&E 1998 and 1999). Ecology evaluated this report when it was written and as part of the Port Angeles Harbor Sediment Investigation Report (Ecology December 2012).[9] The RI/FS Part 1[8] reviewed and evaluated all previous reports, but in accordance with the Sediment Cleanup User Manual (Ecology, December 2021)[10] recommendations on data recency and quality, only used more recent data from 2002 onward to document current environmental conditions in the harbor. The full list of environmental investigations considered and a summary of the data available from those investigations is included in the RI/FS Part 1[8] on Table 4.1.

Section 6 for the RI/FS Part 1[8] explains how we decided on indicator hazardous substances. Under the MTCA chemicals that pose a small percentage of the overall health risk to human and ecological receptors at a site may be eliminated from further consideration. The remaining chemicals are identified as indicator hazardous substances. The indicator hazardous substances pose the greatest risk and typically have the largest footprints. By

[8] https://apps.ecology.wa.gov/cleanupsearch/document/89055
[9] https://apps.ecology.wa.gov/cleanupsearch/document/10309
[10] https://apps.ecology.wa.gov/publications/SummaryPages/1209057.html

focusing the cleanup on the indicator hazardous substances, we will expect to also remediate all additional chemicals that pose only a small risk.

Remedy selection

Some commenters opposed Ecology's proposed remedy, advocating instead for complete or maximum feasible removal of contamination. One commenter specifically disagreed with the selection of Sediment Management Area (SMA) 1's cleanup remedy and requested additional details on the disproportionate cost analysis. Another argued that full removal now would be more cost-effective over time.

Response

SMA 1 Cleanup Remedy Selection and Disproportionate Cost Analysis

One commenter asked for more details on the disproportionate cost analysis (DCA) for SMA 1, similar to Table 4.2 in the Cleanup Action Plan for SMA 2. We included extra DCA results for SMA 2 in the Cleanup Action Plan because we updated and revised that analysis.

The DCAs for SMA 1 and SMA 3 were already completed and included in the Western Port Angeles Harbor Remedial Investigation/Feasibility Study Part 2 FS (RI/FS Part 2; Floyd | Snyder December 2020).[11] We did not make any changes to the DCA for SMA 1.

For SMA 1, we evaluated six cleanup alternatives:

- 1-A: Maximum dredging and excavation
- 1-B: Partial dredging and excavation with capping
- 1-C: Partial subtidal dredging with subtidal and intertidal capping
- 1-D: Partial intertidal excavation and capping with subtidal capping
- 1-E: Subtidal and intertidal capping
- 1-F: Intertidal/berthing area capping with subtidal enhanced natural recovery (EMNR)

Below, we've summarized the SMA 1 DCA in the format the commenter requested.

- **Table 1** shows how costs and benefits change between alternatives using percentages. This helps compare them on the same scale.
- **Table 2** explains why Ecology selected Alternative 1-D. Alternative 1-D cost is only 0.1% higher than Alternative 1-E, but it provides 13% more benefits. That means the extra benefits are worth the slightly higher cost.

[11] https://apps.ecology.wa.gov/cleanupsearch/document/96545

Table 1: SMA 1 DCA

Criteria	Weighting	1-A	1-B	1-C	1-D[1]	1-E	1-F
Protectiveness	30%	5.0	4.5	4.0	**3.5**	3.0	2.5
Permanence	20%	5.0	4.5	4.0	**3.5**	3.0	2.5
Effectiveness Over the Long-Term	20%	5.0	4.0	3.5	**3.0**	2.5	2.0
Management of Short-Term Risk	10%	2.5	3.0	3.0	**3.5**	4.0	4.0
Technical and Administrative Implementability	10%	1.5	2.0	3.0	**4.0**	3.5	4.5
Consideration of Public Concerns	10%	2.5	3.0	3.5	**4.0**	3.5	3.0
Total Weighted Benefits		4.2	3.9	3.7	**3.5**	3.1	2.8
Estimated Cost ($M)[1]		$197.0	$42.9	$20.2	**$12.1**	$12.0	$5.0
Total Benefit per $M		0.02	0.09	0.18	**0.29**	0.26	0.56

[1] Alternative 1-D is the remedy Ecology selected.
[2] Estimated costs in 2019 dollars.

Table 2: SMA 1 comparison of Incremental Changes in Costs and Benefits

Alternative	1-A	1-B	1-C	1-D	1-E	1-F
Benefit	4.2	3.9	3.7	3.5	3.1	2.8
Cost ($Million)	$197.0	$42.9	$20.2	$12.1	$12.0	$5.0
Alternatives compared	**1-B to 1-A**	**1-C to 1-B**	**1-D to 1-C**	**1-E to 1-D**		
Incremental benefit (%)	8%	5%	6%	13%		
Incremental cost (%)	359%	112%	67%	1%		
Ratio of IC (%) / IB (%)	46.7	20.8	11.7	0.1		

Cleanup alternatives are compared based on how permanent they are. Under MTCA's disproportionality test, an alternative is considered too costly if the extra cost is more than the extra benefit it provides compared to another option.

The analysis shows that Alternative 1-D offers the most permanent solution without being disproportionately expensive. It provides greater benefits than Alternative 1-E, but at a similar cost, making 1-D the preferred option based on overall value.

Our evaluation shows that full removal (alternative 1-A), at a cost of $197 million, is disproportionately costly. Alternatives 1-B and 1-C are also disproportionately costly. Alternative 1-D, at a cost of $12.1 million, is permanent to the maximum extent practicable. We chose the most permanent alternative that is not disproportionately costly, so the evaluation ends without comparing the remaining less permanent alternatives.

Concerns About Leaving Contaminated Sediment in Place

We understand and appreciate the community's concerns about leaving some contaminated sediment in place. Our cleanup decisions are guided by our primary goal: protecting human health and the environment.

Under the MTCA, all cleanup actions must meet the following key requirements:

- Protect human health and the environment, including vulnerable populations and overburdened communities.
- Meet cleanup standards.
- Comply with applicable state and federal laws.
- Prevent or minimize current and future releases or movement of hazardous substances.
- Be resilient to the impacts of climate change that could threaten long-term effectiveness.
- Include compliance monitoring.
- Avoid relying primarily on institutional controls or monitoring if a more permanent cleanup is technically possible.
- Avoid relying mainly on dilution and dispersion, unless the cost of more active cleanup measures is vastly higher than the benefit they provide.
- Aim for a reasonable restoration timeframe.
- Use permanent solutions to the maximum extent practicable. That is, remedies that can be reliably designed, built, and maintained, taking cost into account.

All of the proposed remedies in the Feasibility Study meet MTCA's requirements. However, for each SMA, only one alternative provides the most permanent solution that is still practicable. Based on our analysis, the selected remedies offer the best balance between long-term effectiveness and cost. More permanent options were evaluated but found to be disproportionately expensive.

Importantly, we are not required to choose the cheapest cleanup option. Instead, we use a disproportionate cost analysis to compare the benefits and costs of each alternative. This helps us identify the most permanent, practicable remedy for each cleanup area (SMA). If a more permanent option is significantly more expensive but provides only slightly more benefit, it may be considered disproportionately costly and not selected.

Long-Term Monitoring and Maintenance

After cleanup is completed, the site will be regularly monitored. Parties participating in cleanup are required to ensure that the cleanup remains protective, including maintaining any engineered caps. Ecology will conduct periodic reviews approximately every five years, and these reviews will be made available for public review and comment.

Cost Considerations

The cost estimates for all cleanup alternatives include long-term monitoring and cap maintenance. Detailed cost breakdowns are available in Appendix G of Western Port Angeles Harbor Remedial Investigation/Feasibility Study Part 3 Appendices (RI/FS Part 3; Floyd | Snider December 2020).[12]

While full removal may seem like the most thorough option, the added cost is not justified by the limited additional benefit, especially when long-term monitoring can ensure the site remains protective.

Remedy logistics

Two commenters had questions related to the selected remedy. One commenter wondered if the excavation and/or capping will remove "creosote pilings and old, what look like, abandoned overwater structures." Another commenter brought up using glass aggregate for the sediment management areas and questioned the feasibility of this possible solution.

Another commentor requested that the selected remedy includes most of the inner harbor, especially the area around Ediz Hook.

Response

Creosote pilings and overwater structures

The cleanup plan does not include removal of creosoted pilings and old, abandoned overwater structures. However, removal of creosoted structures or piling could be included in conjunction with site cleanup if there is a need to remove structures for access to contaminated sediment or as part of source control since they can be a source of polycyclic aromatic hydrocarbons (PAHs).

Removal of creosoted structures is a frequent habitat restoration activity or could be required as part of a lease agreement. We are aware that McKinley Paper Company, located at the base of Ediz Hook, is removing a pier and crane structure with creosote pilings as part of their lease agreement with the Department of Natural Resources (DNR). A State Environmental Policy Act (SEPA) checklist issued July 7, 2025, outlines the plan for removal of about 88 creosote pilings and associated structures, pile caps, stringers, bracing, and decking, once permits are obtained.

[12] https://apps.ecology.wa.gov/cleanupsearch/document/89056

The Port of Port Angeles has an ongoing process to replace creosote treated piling with steel or concrete pilings. In 2014, the Port received a US Army Corps of Engineers 10-year programmatic maintenance permit to maintain and upgrade their marine terminal facilities. Through this plan, the Port replaced hundreds of creosote piling at Terminals 1 and 3.

Glass aggregate

The concept of using glass aggregate in the construction of the sediment management area caps has not been explored. Evaluation of the characteristics of the materials needed to meet the primary components needed for chemical isolation, and erosion and habitat protection, will take place during engineering design. For example, angular cap materials are often preferred by engineers because they provide greater erosion protection than round materials and, therefore, allow the use of smaller material for equivalent erosion protection. Smaller sized cap materials are often preferred for habitat, so they better match the existing sediment grain size in the cap area. These, and other engineering and habitat considerations, will be refined during remedial design and permitting of the remedy. A local source of materials is preferred due to the minimal transportation costs involved. We are not aware of a local source of glass aggregate at this time or whether the characteristic would meet design specifications, but we'll explore possible sources during design.

We will consider guidance from U.S. Environmental Protection Agency (USEPA), U.S. Army Corps of Engineers (USACE) and any other current, applicable guidance in designing the caps. A preliminary design was included as Appendix K in the RI/FS Part 3[12].

Remedy longevity

A few comments had concerns about the longevity of the cleanup, especially where institutional controls were concerned. There were concerns that anchoring in EMNR areas could occur, causing a breach in the cap that could be hard to detect. There were also concerns about the impacts of natural disasters and sea level rise on the cap and overall cleanup.

Response

Climate change

We hear your priorities of protecting the remedy and making sure the cleanup is resilient to climate change. We also want this cleanup to last and be protective in the future. Tackling climate change is a priority for Ecology. By improving the resilience of cleanup remedies to climate change impacts, we can help ensure that our efforts are effective in the long-term. Our guidance Sustainable Remediation Climate Change Resiliency and Green Remediation (Ecology Publication 17-09-052, 2023)[13] will help us design a cleanup that will last. We will design the caps to withstand potential climate change impacts like sea level rise, increased severity of storms, flooding, and acidification of marine waters and reasonable

[13] https://apps.ecology.wa.gov/publications/documents/1709052.pdf

risks from natural disasters. Sea level rise won't cause contamination to rise through the cap. Sediment caps will be monitored regularly and repaired if needed.

Institutional controls

The Consent Decree and Cleanup Action Plan require institutional controls, such as restrictive covenants, to ensure long-term integrity and protectiveness of the cleanup. Ecology will work with Tribes and others to determine the precise institutional controls that will be required.

In sediment management areas 1 and 2, where caps are used to isolate the contamination, we will evaluate what institutional controls or restrictions are needed after engineering design. We will be sure to consider and add appropriate controls to protect the caps. Limiting the size of anchors or restricting the use of anchors on the cap may be needed to protect the cap.

In sediment management area 3, enhanced monitored natural recovery will add layers of cleanup material to the surface of the sediment that will mix in to the existing sediment through the movement of the water and the activities of the critters living in and on the sediments. We want this material to mix in and reduce the levels of contamination. We are not worried about anchors in this area or within the areas where monitoring natural recovery is planned.

Because of the length of time needed to complete this cleanup, we will likely implement institutional controls before the end of active cleanup as areas of the cleanup are completed.

Commercial vessels interactions with cleanup remedies

One commentor was concerned about whether we warn commercial vessels about potential contamination attached to anchors after anchoring in Port Angeles Harbor. Only a small amount of sediment remains on an anchor once it is hauled aboard a vessel and generally the crew has very limited, if any, contact with that sediment.

Potential impacts on selected remedies from other Harbor projects

Two commenters had questions and shared concerns regarding the potential impacts from Project Macoma, another project in Port Angeles.

Response

This pilot project is not expected to impact the harbor sediments or affect the cleanup planned. The pilot project will be completed before our cleanup construction begins.

More information about Project Macoma:

Project Macoma is a first-of-its-kind pilot project by a company, Ebb Carbon, to see whether seawater can soak up carbon dioxide from the air. The project pulls seawater from Port Angeles Harbor and treats it to make the water less acidic, then returns the water back

into the ocean where it will act like a sponge to soak up CO_2 from the air. The project uses a barge and onshore facilities at the Port of Port Angeles log yard (Marine Terminal 7).

Ecology's Water Quality Program has a regulatory role to ensure the project does not harm water quality. Ebb Carbon applied for, and received, an individual water quality permit called a National Pollutant Discharge Elimination System (NPDES) permit to safely discharge the less acidic water back into the marine waters. Ecology issued a water quality permit for Project Macoma on Oct. 30, 2024. The permit covers a two-year pilot project. The final permit incorporated feedback from the public comment period, including lowering the amount of alkaline water they can discharge back into the ocean and establishing stronger monitoring requirements. Ecology's Water Quality Program is not involved with determining whether the project has climate benefits.

PFAS

Three comments emphasized the desire that Ecology tests for per- and polyfluoroalkyl substances (PFAS) in the waters and sediments of the site. One commentor requested we include PFAS as a contaminant to monitor, measure, and remove. There were also concerns about the impacts of PFAS on wildlife and habitat, especially for wildlife that may be consumed by humans.

Response

Ecology does not currently plan to test for PFAS in water and sediment at this site, because we do not have established cleanup levels and sampling methods. While the cleanup was designed for known contaminants, which do not include PFAS, we expect the sediment cleanup plan will also address PFAS if present.

More information about Ecology's approach to PFAS:

PFAS are a group of unique synthetic organic chemicals that are stable and persistent in the environment. Commercially manufactured since the 1940s, PFAS compounds have been used in manufacturing common consumer products, such as carpeting, clothing, furniture, outdoor equipment, and food packaging. Many industries have also used PFAS, including aerospace, automotive, aviation, electronics, and medical industries. One major source of PFAS contamination is Aqueous Film Forming Foam (AFFF) which is used for fire training and extinguishing petroleum fires and other flammable liquids. Information related to PFAS investigation and remediation is rapidly evolving.

Ecology is still evaluating the issues related to PFAS in marine sediment, working to establish a method to evaluate risks to human health and aquatic life, and developing a process to set cleanup levels. Because of this, Ecology is not planning to sample for PFAS at the Western Port Angeles Harbor site. We can't effectively evaluate PFAS until sampling methods and appropriate cleanup levels are established. Ecology's June 2025 Guidance for Investigating and Remediating PFAS Contamination in Washington State discusses evaluation of PFAS in groundwater, surface water, and soil, but not in sediment or fish or shellfish tissue.

As Ecology mentioned in our Western Port Angeles Harbor Open House Presentation[14] on February 5, 2025, Ecology has identified the footprint of our main contaminants of concern, including dioxins/furans, polychlorinated biphenyls (PCBs), carcinogenic polycyclic aromatic hydrocarbons (cPAHs), and metals. This large, approximately 1,100-acre, area is our sediment cleanup unit. This is the area that needs cleanup. Addressing the contamination within this footprint, is expected to also address all other contaminants in the area, including PFAS. As science progresses and sediment cleanup levels are established, we will reconsider whether testing or monitoring PFAS within Port Angeles Harbor or in fish or shellfish is needed.

At this time, Ecology is prioritizing our PFAS work on soil and groundwater associated with sources where large quantities of PFAS were known to be used, stored, or manufactured, such as fire departments, airports, fire training facilities, landfills, dry cleaners, and metal plating and finishing facilities.

Sampling and ongoing monitoring

Three commenters had concerns that the proposed sampling was not deep enough. We also received a comment asking for clarification on the sampling process and the next steps. Another commenter requested that we have adequate monitoring of the creeks and stormwater in place to ensure that there aren't any new sources of contamination ongoing.

Response

Cleanup standards and sampling depths

Our cleanup standards are based on both a protective cleanup level and a location or depth where the cleanup must be met. These locations or depths, called points of compliance, are based on where people or animals may be exposure to contamination.

In Puget Sound, most marine benthic macroinvertebrates are found within the uppermost 10 centimeters (cm, about 4 inches) of sediment. This depth has been established as the biologically active zone depth that is protective of most benthic organisms. The fish and mobile shellfish, like crab, feed on the benthic community and are in contact with these uppermost layers of sediment meaning ensure cleanup levels are met within the top 10 cm is also protective of bioaccumulation exposures for larger animals and human health.

We are also concerned about protecting the non-mobile, or sessile, shellfish in intertidal areas and the people who dig on the beach and eat the shellfish they uncover. For intertidal areas in Port Angeles, a 45 cm (about 18 inch) depth was found to contain most of the types of shellfish expected to be harvested and the depth people typically dig on the beach while collecting shellfish or playing. Making sure cleanup levels are met within the top 45 cm of intertidal areas will protect these shellfish and the people harvesting them or consuming them.

The sediment cleanup levels and points of compliance can be found in Table 3.1 of the Cleanup Action Plan.

[14] https://www.youtube.com/watch?v=m2PID6uLe-U

Next steps and additional sampling

Our next steps include developing a work plan for additional data collection, engineering evaluations, and developing the engineering design report. The additional data collection will help refine exactly where different remedial activities, such as capping, excavation or dredging, enhanced monitored natural recovery, or monitored natural recovery will take place. The additional sampling will include confirming the breath and type of contaminated sediment on a finer scale, especially near the boundaries between different remedial activities and in the lagoon where multiple remedial techniques are planned. It will include determining contamination depths in areas where this is important to the design of the remedy.

For some sediment remedial techniques, such as capping, the exact depth of contamination doesn't change the design. Knowing the exact depth is important for excavation or dredging remedies. Details of the remedial design plans and process, including data collection and engineering evaluations, are outlined in Section 5. 1 of the Cleanup Action Plan. While we are not planning to hold a public comment period on this work plan, we will let you know when we've completed it and will post it on our website along with updates on when the work will begin.

Preventing recontamination and ongoing monitoring

This cleanup plan represents a significant effort to restore the health of Port Angeles Harbor. Ecology wants to ensure the cleanup is successful in perpetuity. Besides the Port Angeles Harbor Site, Ecology's Toxics Cleanup Program actively works on multiple other cleanups along or near the shoreline in Port Angeles to eliminate sources of contamination from upland soil and groundwater to the harbor. Major sites Ecology addressed or is currently working on include:

- K Ply (CSID 28),
- Marine Trade Area (CSID 1301),
- Terminals 5, 6 & 7 Uplands (CSID 15440),
- Pettit Oil Company Port Angeles WHS (CSID 3447),
- Unocal Bulk Plant 0601 (CSID 4976),
- Pettit Oil Company Tumwater Truck Route (CSID 13146), and
- Former Shell Oil Bulk Plant (CSID 13147).

Cleanup of these sites in parallel with cleanup of the harbor will help ensure recontamination is not an issue. Ecology is also evaluating additional stretches of shoreline that may need to be evaluated as possible sources of historical contamination so that we can protect our remedy. Ecology's Water Quality Program monitors outfalls and discharges to the harbor and is actively working to address and bring into compliance any exceedances above current permit allowances.

Section 6.0 of the Cleanup Action Plan also outlines potential contingency actions if the cleanup standards are not achieved within the 10 years post construction restoration timeframe and recontamination may be a factor.

Construction logistics and impact

We received a few questions regarding the logistics of cleanup construction. One commenter wanted to know where the final destination of contaminated sediment would be, if cleanup on the sediment management units would be simultaneous, and the source of clean sediment.

We also received feedback from the community voicing their desire for cleanup construction to take place sooner rather than later. Another commentor also requested Ecology work collaboratively to reduce the impact of truck traffic. Additionally, another commentor wanted to make sure Ecology is taking adequate precautions to prevent sediment resuspension and spread during cleanup.

Response

We are excited to move into the next phase of the cleanup which will include additional design data collection, engineering evaluations and design. The data collection and engineering evaluations will provide the information necessary to complete the design and answer these questions. With a complete engineering design, we can proceed with permitting and contracting so construction can begin. We agree with the community that it has taken a long time to get to this point, and we are also eager to get to cleanup construction.

Sediment disposal

The Remedial Investigation/Feasibility Study (Ecology, 2020) evaluated options for disposal, including:

- beneficial reuse,
- open-water disposal,
- nearshore confined disposal, and
- landfill disposal options for the contaminated sediment.

Landfill disposal was determined to be the only viable disposal option. Based on the known sediment concentrations, the dredged material is assumed acceptable for disposal as contaminated non-hazardous “Subtitle D” material. For cost estimation purposes, the dredged material was assumed to be transported by truck to Tacoma followed by rail to a regional Subtitle D landfill facility, such as the Roosevelt landfill, in Eastern Washington. We’ll select the final disposal option during engineering design.

Clean cap material

Clean material for caps and enhanced monitored natural recovery is expected to be sourced from a local quarry. Cost estimates assumed a source of clean material within 5

miles of Port Angeles. The material must be free of contamination and meet all remedial specifications for the purpose. We have not identified a source yet.

Construction sequencing

The sequencing of cleanup within the sediment units will be outlined during engineering design, but the final schedule and sequence for construction activities, including details on if work may be conducted in multiple sediment management areas at the same time, will be finalized when a construction contractor is hired. Because of the size of this project, it's unlikely that every sediment management area's remediation will begin at the same time, but will be sequenced to make the most efficient use of equipment and resources.

Minimizing sediment disturbance

Plans and the use of best management practices will minimize the short-term risks associated with the selected cleanup actions. The plans and best management practices (BMPs) will be followed by all contractors participating in the cleanup. These plans and BMPs will include methods of limiting turbidity and resuspension-related releases during the dredging and in-water clean material placement work. Example of BMPs for dredging include use of a special bucket that closes to minimize releases of sediment during lifting, not overtopping the sideboards of the barge so material won't spill, and using silt curtains to minimize spread of resuspended materials.

Truck traffic and community coordination

The transport of material to and from the site will require coordination with the City of Port Angeles and the public to minimize the impact on traffic and local businesses. Routes will be selected to minimize impacts. We will develop ways to notify the public of the truck route and times when trucks will be running.

Costs and accountability

One commenter was concerned that the cleanup costs could be passed onto Port Angeles residents and taxpayers. Another commenter stressed that those responsible for the contamination should be responsible for the full costs associated with this cleanup.

Response

State law requires that the "polluter pays". The potentially liable parties who will pay for this cleanup project are listed on page 5. Ecology provided remedial action grants to the City and Port of Port Angeles to help pay for costs at Western Harbor and other cleanup sites in Port Angeles.

MTCA requires that anyone potentially liable for the contamination pays the costs of cleaning up the contaminated site. This responsibility includes the costs of investigation, evaluating options for cleanup, designing the cleanup, public involvement, the cleanup construction, any required long-term monitoring or maintenance, and Ecology's oversight of the work. Our oversight of the work ensures the cleanup is completed appropriately.

Under MTCA, potentially liable parties are all equally responsible for all the cleanup costs. Often the responsible parties divide the cost, but Ecology doesn't get involved in this allocation.

Each year, we provide millions of dollars in grants to local governments to help pay for the cost of site cleanup. Grants are also available for local citizen groups and neighborhoods affected by contaminated sites to facilitate public review of the cleanup. More information is available on our oversight remedial action grants webpage.[15]

Local governments can apply for a loan or grant to help clean up hazardous contamination sites that are supervised by Ecology under a legal agreement. These are remedial action grants. Every even-numbered year, we work with local governments to understand the 10-year cost of critical cleanup work in Washington. Their responses inform our biennial budget request to the Governor and Legislature. Our grant managers coordinate applications for grants and loans that receive funding every two years in the approved biennial budget.

The City and Port of Port Angeles have received remedial action grants to assist with cleanup of the Western Port Angeles Harbor site and at other cleanup sites in Port Angeles. Along with the grants or loans from the State, local governments - like the City and Port of Port Angeles - often have insurance money available to cover or help cover the costs of environmental cleanup so that the burden of costs aren't passed on to residents and taxpayers.

Restoration and ecological habitat

One commenter wondered how habitat would be restored after disturbances from cleanup. A different commenter suggested that the selected cleanup remedy of capping would negatively impact the habitat and that other options should be considered. Another commenter requested that Ecology consider the restoration and enhancement of Sail and Paddle Park through this cleanup process.

Response

Performing a cleanup in western Port Angeles Harbor will temporarily disrupt the habitat, but the cleanup will ultimately improve conditions. Overall, the cleanup will result in no net loss of function or aquatic area. Habitat considerations and requirements will be refined during remedial design and permitting. The final engineering design will use best management practices to minimize impacts to habitat.

How habitat will be protected and restored

The engineering design process for the caps will consider the optimal balance between protectiveness, habitat function, and constructability. The materials used for the upper

[15] https://ecology.wa.gov/about-us/payments-contracts-grants/grants-loans/find-a-grant-or-loan/oversight-remedial-action-grants-loans

layers of the caps will be compatible with habitat substrate requirements. Capping in some intertidal areas of the lagoon may result in loss of aquatic land which will be mitigated for by creation of additional aquatic land through removal of the causeway and other shoreline areas, if needed.

Some commenters requested full removal rather than capping. It's important to remember that if full removal by dredging was chosen as the final remedy, it would also have significant short-term impacts on habitat.

Intertidal excavations will be designed with an objective of minimizing impacts to sensitive habitats (e.g., eelgrass beds) and biota (e.g., salmon) during excavation, in accordance with regulatory requirements.

Enhanced monitored natural recovery (EMNR), also referred to as thin-layer placement, is expected to accelerate the natural recovery in large areas of the harbor without the temporary large-scale destructive impacts to habitat caused by dredging or capping. The EMNR layer can be applied in thin layers with minimal impacts to the habitat and the benthos living in the sediments.

Habitat recovery is expected to occur relatively quickly if surface conditions are restored to conditions suitable for regrowth and recolonization by benthic invertebrates.

Sail and Paddle Park

The Western Port Angeles Harbor cleanup focuses on cleaning up sediment contamination below the mean higher high-water mark. The Sail and Paddle Park is a facility overseen by the City of Port Angeles along the inside of Ediz Hook. It appears to be located on the shoreline adjacent to the area where monitored natural recovery is planned. The comment appears interested in habitat restoration at this park. Under monitored natural recovery the low levels of sediment contamination will be monitored to ensure the sediments recover within a reasonable time frame. Recovery is currently estimated to take about 10 years following the cleanup of other areas of the site. No other restoration or enhancement work is currently planned in this area of the harbor as part of this cleanup though we expect improvements in the overall health of the harbor with cleanup in other areas.

If you suspect toxic contamination is present at the Sail and Paddle Park, you may file an Environmental Report Tracking System (ERTS) complaint to have the site investigated. If contamination is discovered at unsafe levels, the MTCA cleanup process will be triggered to clean up the site to levels that are safe for human health and the environment. For any improvement request regarding the facilities, please contact the City of Port Angeles.

Other restoration opportunities

In a separate process, the 2001 Western Port Angeles Harbor Natural Resource Damage Assessment (NRDA) settlement resulted in funds for environmental restoration work in the harbor from the potentially liable parties.

The Port Angeles Harbor NRDA Trustee Council is looking for viable restoration projects in the harbor. The Ediz Hook shoreline has been identified as an area with restoration opportunities. Ideas or proposals can be submitted to:

Larissa Lee
Lead Administrative Trustee
Western Port Angeles Harbor Restoration Program
Email: larissa.lee@noaa.gov

Public involvement

Some commenters requested that Ecology keep the public informed of the cleanup's progress. Another commenter asked if there will be another chance for public review of the engineering analysis and report, which will be completed before the cleanup construction begins. Another commenter shared their appreciation for the open house presentation Ecology gave during the comment period.

Response

This site will not have another public comment period where we are accepting public comments until after cleanup construction takes place and periodic reviews begin. However, we will continue to post technical documentation for public reference on the site webpage.

There are multiple ways to stay informed about the cleanup's progress:

- Ecology will send out updates to keep the community informed on the progress of cleanup. Updates will be posted on the site webpage as cleanup progresses.
- We will also send out these updates through the Cleanups in Port Angeles email notification list. If you'd like to stay informed on this site and other cleanups in Port Angeles, please subscribe online.[4]
- You can also subscribe for site-specific updates on Ecology's Western Port Angeles Harbor cleanup page.[3] Those subscribed will receive a weekly email update whenever there is an open comment period, a new document, or an update to the cleanup details.
- In the past, we have also attended community events such as Forever StreamFest. These community events allow community members to meet Ecology staff and discuss our cleanups in the area.

We are glad to hear that some members of the public found our presentation informative and well organized. Public participation is a crucial part of our work, and we strive to make our outreach as meaningful as possible.

Public warning and signage

Multiple comments asked about signage. Specifically, whether there are already signs present or if Ecology will be posting signs around the site to warn the public and aquatic recreators of contamination. There were also questions about how the public will be notified regarding the risks to human health due to potentially contaminated fish and shellfish consumption.

Response

Signage

Much of the shoreline surrounding the Western Port Angeles Harbor cleanup site is zoned and used industrially; the public doesn't have access to the shoreline in these areas. We are not aware of any current signage on public beaches related to the cleanup. Ecology will work with the Western Port Angeles Harbor potentially liable parties and property owners to identify shorelines where the public may have access to the harbor and consider appropriate signage for those shorelines.

Fish and shellfish consumption

The Western Port Angeles Harbor sediment cleanup levels are very conservative and based on contact with contaminated sediment or ingestion of fish or shellfish daily over many years or a lifetime. We do not expect risk to human health from occasional recreation, such as diving, swimming, or kayaking.

The public is encouraged to check the Washington State Department of Health Shellfish Safety Map[16] for current information regarding shellfish safety and beach closures. Most of the Western Port Angeles Harbor sediment cleanup area is classified closed due to pollution from the wastewater treatment plant outfall located in the eastern part of the harbor. As of the date of this responsiveness summary, all recreational shellfishing beaches are closed to all species of shellfish due to biotoxins and the beaches not meeting health standards.

Aquatic recreation

Clallam County Health & Human Services Environmental Health Department (CCHHS-EHD) promotes and protects health, safety, and quality of life for people in Clallam County. They coordinate with Beach Environmental Assessment, Communication and Health (BEACH) Program volunteers to monitor surface water at local beaches and post swimming advisories or closures based on the number of enterococci bacteria in the water. In Port Angeles Harbor Hollywood Beach is monitored and warnings are posted when bacteria levels are high.

[16] https://fortress.wa.gov/doh/biotoxin/biotoxin.html

Tribal and government coordination

One commenter expressed appreciation for considering indigenous people in developing the Cleanup Action Plan.

Another commenter shared the HPA permit process and how the Washington Department of Fish and Wildlife will be involved with this cleanup.

Response

Thank you for your comments. Tribal engagement is a requirement of MTCA. We value the Tribal engagement we have received from the Lower Elwha Klallam, Port Gamble S'Klallam, and Jamestown S'Klallam Tribes while working on this project.

We also appreciate the comments regarding the Hydraulic Permit Approval (HPA) process. We recognize the potential impacts related to the proposed dredging and capping and acknowledge the need to work through the potential impacts and the sequential avoidance, minimization, and compensatory mitigation during the HPA permit process.

No cleanup needed

One commenter disputed the need for cleanup activities to take place because nature will break contaminants down to safe levels or has already done so.

Response

The contamination at this site is too widespread and complex to break down only with natural processes.

Ecology is required to fulfill state law[17] cleanup requirements, and natural recovery for the entire cleanup site would not allow us to meet requirements in a timely manner. However, our plan for cleanup includes a variety of techniques – including monitored natural recovery in nearly 950 acres of the site.

Over many years, natural processes can decrease or "attenuate" concentrations of some contaminants in sediments over time. However, not all types of contaminants attenuate over time, and can only decrease concentration through dilution or dispersion. The length of time needed for natural recovery in the sediment in Western Port Angeles Harbor is estimated to take more than 70 years. This is too long to be considered a reasonable restoration time period, particularly where contamination affects fish and shellfish harvested and consumed by the general public and Tribes with treaty rights.

In areas of the harbor with lower levels of contamination, the remedy considers natural recovery, including monitored natural attenuation and enhanced monitored natural attenuation. These techniques require regular monitoring to ensure that recovery is happening at the expected recovery rate. In these areas, cleanup levels are expected to be reached with the help of natural processes within 10 years after cleanup construction.

[17] https://apps.ecology.wa.gov/publications/SummaryPages/9406.html

Administrative notes on documents

We received two comments that requested corrections on documentation.

Response

Thank you for your comments. We have considered these comments and made sure proper corrections were made in the final documents.

The comments we received include:

- Correction - Change AGs name on CD; “P. 32 Ferguson is no longer the AG. The new AG’s name should added.”

  We updated the signature block in the CD with our current Attorney General’s name, Nicholas Brown. We also updated the program manager name for the Toxics Cleanup Program from Barry Rogowski to Nhi Irwin.

- Correction - Date of first investigation; “COMMENT: EPA INVESTIVATED THE HARBOR IN 1997 OR 1998."

  We didn’t update the date of the first investigation. The Rayonier Pulp Mill Expanded Site Inspection (TDD: 97-06-0010) was completed by EPA’s Region 10 Superfund Technical Assessment and Response Team (START) in 1998; however, this investigation was focused on the Rayonier Mill Site. It had two specific goals:

  - To provide the EPA with adequate information to determine whether the [Rayonier] site is eligible for placement on the National Priorities List and, if so, support the EPA’s case for listing the site, and
  - Alert the EPA to immediate threats to public health or the environment and evaluate whether early action/removal activities are appropriate for the site.

  Since the focus of the study was on the Rayonier Mill site, the study’s design did not contemplate a source area in the western portion of the Harbor. The study’s sampling was biased toward answering questions about the Rayonier Mill site and did not focus on investigation of the western portion of the Harbor though a few samples were taken in the area. For this reason, we did not update the date of the first investigation conducted to characterize environmental conditions in the western Harbor.

Appendix A:

Public Comments – Summary and Full Comments

We consolidated our responses to comments into the following list of major topics of concern.

1. Cleanup levels
2. Remedy selection
3. Remedy logistics
4. Remedy longevity
5. Potential impacts on selected remedies from other Harbor projects
6. PFAS
7. Sampling and ongoing monitoring
8. Construction logistics and impact
9. Costs and accountability
10. Restoration and ecological habitat
11. Public involvement
12. Public warning and signage
13. Tribal and government coordination
14. No cleanup needed
15. Administrative notes on documents

The following table lists the commenters, the general topics of their comments, and the page number where the complete comment can be found in this document.

Table 3: Commenters

Commenter	Representing	Topic of Concern	Page Number
Andersen, Helle	Self	3, 11	30
Anonymous	Self	2	31
Beldin, Joan E	Self	4, 7, 10, 12	32
Fischer MD, Mark	Self	10	33
Green, Brady	Washington State Department of Fish and Wildlife	13	34
Lynch-Ritchie, Susan	Self	2	37
Lynch-Ritchie, Susan	Self	2	38
Mantooth, Roberta and James	Self	1, 2, 4, 5, 6, 7, 12, 13	39
McDonald, Michael	Self	3	40
McGinnis, Roger	Self	4	41
Neurath, Eric	Self	8, 9	42
Pickett, Paul	Self	7, 8	43
Schanfald, Darlene	Olympic Environmental Council	6, 8	44
Schanfald, Darlene	Self	15	45
Schanfald, Darlene	Olympic Environmental Council	1, 2, 4, 5, 6, 7, 10, 12, 15	46
Sextro, Robert	North Olympic Group of the Sierra Club	2, 4, 7, 11, 12	50
Spees Dr., Karl	Self	12, 14	51
Stephanz, Nancy	Self	9, 11, 12	55

Comment 1: Andersen, Helle

Sumit date: February 6, 2025
Submit method: Email

Connie Groven,
Yesterday my husband and I went to Ecology's presentation in Port Angeles about the cleanup effort in the harbor. The presentation and the whole event was very informative and well organized. So thank you to you and the team for the effort!

I have a comment, however, not to the selected cleanup alternatives for the SMAs. In SMA 1 there are a lot of creosote pilings and old, what look like, abandoned overwater structures. I was wondering during the excavation/capping effort will any of these pilings/structures be removed? Or are these regarded as a part of the upland mill site?

Thank you for your time
Helle Andersen

Comment 2: Anonymous

Sumit date: February 13, 2025
Submit method: Website

I've lived in Port Angeles for almost 50 years and have always been concerned about pollution of our harbor and waterfront from the mills and other waterfront businesses. It's been a long wait to see enough cleanup. For the safety of people, animals and the land, I favor removal of as much contamination as possilble (without harming sacred Indian sites or sealife). Letting our children, grandchildren, and future generations enjoy this area without worry about toxicity is my dream.
Thank you.

Comment 3: Beldin, Joan E

Sumit date: February 17, 2025
Submit method: Website

-- Can there be a guarantee that no leak will occur from capping? How well will capping hold up in
the event of a tsunami or earthquake?
-- There will be habitat loss and species loss in the process of the cleanup. How will the habitat be
rebuilt and the organisms be repopulated?
-- There has been no signage warning the public of the toxicity of these waters. Signage needs to be
posted along the waterfront warning of risks for human health associated with consumption of fish and shellfish.
-- Contaminants need to be studied at great depths than proposed.
-- Will sea level rise cause contaminants in sediments to emerge again after they have been
covered with clean material? If so, what is the proposed solution?

Comment 4: Fischer MD, Mark

Sumit date: February 9, 2025
Submit method: Website

Hello Community members and Study Group.
I have read about the Western Harbor Clean Up in the past few years.
Along with the current Fact Sheet indicating several steps and goals for cleanup.
I sure appreciate the time and effort of all the entities involved in this major project.

After a year of collaboration and planning, excavation/creation of the Ediz Hook Sail and Paddle Park started in June of 1989.
This was a vision from a handful of us windsurfers to create a nice, designated site for non-motorized recreational harbor access.
Parking stalls, picnic tables and running water for gear cleaning were created.
It has remained a recreational site for many years.
Thank you to the City of Port Angeles.

Since that time, there has been much broader enjoyment and access to the kayak experience.
Along with several years of rowing instructions and competition that transcends all ages. (OPRA, Olympic Peninsula Rowing Association).

The Sail and Paddle Park proximity and beauty are unmatched.
The general site could use collaborative review and a plan for cleanup and enhancement.
It would seem logical that OPRA be involved.
Consider an upgrade to this site for rowing, paddling, sail or kite boarding.
Along with walking, picnics and viewing scenery.

If appropriate, is there interest and a process for the Western Harbor Group to include this idea(above) in the Main Actions for Cleanup ?

Thank You Very Much for Your Consideration.

Mark Fischer MD (ret)
Port Angeles, WA

Comment 5: Green, Brady on behalf of the Washington State Department of Fish and Wildlife

Sumit date: February 18, 2025
Submit method: Website

[Comment begins on next page]

State of Washington
DEPARTMENT OF FISH AND WILDLIFE
Coastal Region • Region 6 • 48 Devonshire Road, Montesano, WA 98563-9618
Telephone: (360) 249-4628 • Fax: (360) 249-1229

February 18, 2025

Clallam County
ATTN: Connie Groven, Site Manager

Dear Connie Groven:

Thank you for the opportunity to comment on the Western Port Angeles Harbor 2025 project, located near Port Angeles, as proposed by Jesse Waknitz. The Washington Department of Fish and Wildlife (WDFW) is dedicated to preserving, protecting, and perpetuating the state's fish, wildlife, and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities. In recognition of our responsibilities, we submit the following comments for the Western Port Angeles Harbor 2025 project. Other comments may be provided in the future.

Project Area of Potential Effect:

The project is located within parts of Township 31 N & Range 6 West and Township 30 North & Range 6 West.

Fish and Wildlife Resources and Recommendations:

During the HPA process, WDFW will be reviewing the application and evaluating impacts to fish and shellfish present in the area. Potential impacts from the proposed dredging and capping work may include water quality impacts, turbidity containment, dredge methods, and changes to substrate and nearshore habitat function. The potential for these impacts, and their sequential avoidance, minimization, and compensatory mitigation needs, will be assessed during the HPA permit review process.

If you have any questions or concerns, please feel free to contact me at (360)764-0866 or Danielle.Zitomer@dfw.wa.gov.

Sincerely,

Danielle Zitomer
WDFW Area Habitat Biologist

332 E 5th St. #210
Port Angeles, WA, 98362

Cc: Gwen Lentes, Regional Habitat Program Manager (Gwendolen.Lentes@dfw.wa.gov)

Lindsay Wourms, Assistant RHPM (Lindsay.Wourms@dfw.wa.gov)

Jessica Bryant, Regional Land Use Lead (Jessica.Bryant@dfw.wa.gov)

Brady Green, Habitat Biologist (Brady.Green@dfw.wa.gov)

Comment 6: Lynch-Ritchie, Susan

Sumit date: February 7, 2025
Submit method: Email

I'm *deeply dismayed* by the extent of toxins in the Port Angeles Harbor for fish, marine mammals and land animals, including humans.

I vote for removing all the contaminants, ***not just covering them up.***

It's more than likely that the contaminants will surface over the coming years making the harbor continually dangerous.

We'd always have a dangerous tidal zone!

This is NOT and never will be something we want our children and future generations to inherit and get deeply worried about!!

Susan Lynch-Ritchie, M.Ed.

1511 W 16th Street

Port Angeles, WA 98363

(360-808-6282)

Comment 7: Lynch-Ritchie, Susan

Sumit date: February 8, 2025
Submit method: Website

Any clean up ought to include most of the inner harbor, especially all along Ediz Hook, not just the western area closest to the marina. It's a massive job but a worthy one for the marine life in this area and future generations.

Comment 8: Mantooth, Roberta and James

Sumit date: February 7, 2025
Submit method: Website

We support these comments Darlene Schanfald submitted on behalf of Olympic Environmental Council:

Olympic Environmental Council's Project Coordinator Darlene Schanfald already has sent hers in. They include:
Will signage be posted along the waterfront warning of risks for human health associated with consumption of fish and shellfish?
Are the most recent scientific standards being used to determine "safe levels"?
What about cumulative effects from combined contaminants at any one site?
Testing is crucial for PFAS (per- and polyfluoroalkyl substances that break down slowly and have been used for coating and binding of paper products).
Will sea level rise cause contaminants in sediments to emerge again after they have been covered with clean material?
If Project Macoma is allowed to operate a pilot project for removing carbon dioxide from waters of Port Angeles Harbor, how will that enable contaminants to spread?
Habitat for animals used for seafood need to be tested for plastics of any size as well as PFAS.
Contaminants need to be studied at greater depths than proposed.
"More energy and expense will be expended over the years by capping and monitoring, when it would be less expensive to remove all the contaminants in the beginning. Mitigations of covering up make no sense. This is a less expensive path for the use of public and private funds."

We also are expressing our appreciation for consideration of the indigenous people in developing the Western Harbor Cleanup Action Plan.

It is important that the Lower Elwha Klallam Tribe's decisions about balancing needs for cleanup and for respecting archaeological findings of significance.

We have confidence they will do everything they can to make sure the plan and its implementation give the utmost respect to the animals and plants within the harbor and the people impacted by contaminants.

Thank you.
Jim and Robbie Mantooth (James E. and Roberta T. Mantooth)
2238 E. Lindberg Rd.
Port Angeles, WA 98362
360-808-3139

Comment 9: McDonald, Michael

Sumit date: February 6, 2025
Submit method: Email

Hi Connie,

I was hoping to make the meeting last night but didn't want to mess with the ice. Sorry to have missed you.

I mostly wanted to hear more about the cleanup, but was also wanted to ask a question - do you think glass aggregate might be a suitable adjunct for the sediment management areas?

Given we currently have no public glass recycling options in PA, it could be a good way to insource what might be a useful material. But I have no idea about the pragmatics involved.

Best,

Michael

Comment 10: McGinnis, Roger

Sumit date: January 25, 2025
Submit method: Website

Ecology's preferred alternative for SMA-3 is listed as enhanced monitored natural attenuation. While disturbance of the sand layer by prop wash is unlikely due to the water depth, anchor drag has not been addressed. Institution controls such as no anchor zones may not be effective since SMA-3 is an active shipping area with numbers of large ships anchored within the area at any given time. Unless divers are used, sediment sampling during long term monitoring is unlikely to occur at locations where anchoring has occurred.

Comment 11: Neurath, Eric

Sumit date: February 2, 2025
Submit method: Email

Abby,

As a 22 year resident of Port Angeles, I have a couple comments on the western Port Angeles harbor cleanup plan. Whatever the outcome of the public meeting, my hope is that Ecology will proceed with a plan even if modified from the one proposed, so that significant improvement to the harbor can happen sooner than later. I have witnessed the cleanup of the Rainier Mill site drag on for decades with no end in sight. Meanwhile the cost of any work done continues to climb and large areas of prime waterfront property remain off limits for public use or any kind of development., which adversely affects our local economy.

My other comment is about who bears the cost of the proposed cleanup. Since the City of Port Angeles and the Port of Port Angeles are named in the short list of PLP's, I am expressing my concern that an unfair burden of the cost of this cleanup could be placed upon the current residents and taxpayers. The toxic substances identified in the harbor have been primarily created by harbor based industries during the past one hundred years. I want the corporations listed to pay the lion's share of the cleanup cost, along with some assistance from the state or federal government. Our utility rates (water and sewer) have already skyrocketed due to state mandated cleanup efforts of the harbor. Building costs related to state stormwater treatment regulations have increased the cost of property in town for new construction.

If there are significant tax and fee increases passed onto the residents of Port Angeles, then our status as an affordable place to live with a good quality of life will be further eroded. Viewed from the perspective of a Seattle area resident the cost of living here may seem like a bargain, but the opportunities to earn a decent living here are limited, the median household income is half that in Seattle, and Port Angeles has been struggling for many years to sustain a viable economy given the loss of the natural resource based industries that supported (and polluted) this city for so long.

Eric Neurath

360-477-0112

Comment 12: Pickett, Paul

Sumit date: February 15. 2025
Submit method: Website

Ensure that there is adequate monitoring of creeks and stormwater to ensure that no continuing contamination is occurring.

Take adequate precautions to prevent the resuspension and spread of sediments from areas being dredged or excavated.

Work with WSDOT and City of Port Angeles to minimize the impact of truck traffic on normal traffic and local businesses.

Comment 13: Schanfald, Darlene on behalf of the Olympic Environmental Council

Sumit date: February 16, 2025
Submit method: Email

Connie:

In your online presentation, I heard you say PFAS would be analyzed. Is this for sure?

Are the contaminated sediments going to the Vancouver-Portland area landfill?

From where is the clean sand brought in from?

Will the 3 site cleanup areas, or combination of, be worked on simultaneously?
Are they all scheduled for 2029 construction to begin?

Darlene Schanfald
Olympic Environmental Council
Project Coordinator,
Rayonier Mill-Port Angeles Harbor Hazardous Waste Cleanup Project
PO Box 2664
Sequim WA 98382
1-360-681-7565

Comment 14: Schanfald, Darlene

Sumit date: January 21, 2025
Submit method: Email

P. 32 Ferguson is no long the AG. The new AG's name should added.

Darlene Schanfald, Ph.D.

darlenes@olympus.net

360-681-7565

Comment 15: Schanfald, Darlene on behalf of the Olympic Environmental Council

Sumit date: January 24, 2025
Submit method: Email

PO Box 2664 Sequim WA 98382

24 January 2025

Washington State Department of Ecology

SW Regional Office

300 Desmond Dr SE

Lacey WA 98503

Attention: Connie Groven

RE: Western Port Angeles Harbor Cleanup Site ID: 11907

The Olympic Environmental Council (OEC) submits the following questions and comments. The OEC is a federally recognized nonprofit whose focus is to protect the natural resources and public health on the North Olympic Peninsula. These comments are relative to the Consent Decree, SEPA and the Cleanup Action Plan.

“As a result of historical and current activities, hazardous substances in the Harbor pose risks for both human health and the environment. Risks for human health are associated with the consumption of fish and shellfish. Benthic invertebrates living within Harbor sediments may also be at risk.”

QUESTION: To protect human health, will signage be posted along the waterfront?

P. 58: 2.3 Environmental Investigations

Beginning in 2002, numerous environmental investigations of Port Angeles Harbor have been conducted to characterize environmental conditions in the western Harbor**.**

COMMENT: EPA INVESTIVATED THE HARBOR IN 1997 OR 1998.

When you say “safe levels,” confirmed years ago, **do those “safe levels” of yesteryear still hold by today’s standards? What about the cumulative effects from the combined contaminants at any one site?**

Paper mills and plywood mills operated in these areas. PFAS are known contaminants used by these mills as coating and for better binding. Testing for PFAS in the waters and sediments is crucial. Just because PFAS did not come to light during earlier testing times, in that it is now

known, water, sediments and eelgrass must be tested for this chemical. It is not to be ignored.

Based on a weight-of-evidence evaluation in the RI/FS, including radioisotope analyses, SPI surveys, and hydrodynamic calculations, most sediments in the western Harbor are highly stable and are not subject to resuspension even under worst-case hydrodynamic conditions (WPAH Group 2020). However, there are localized areas of the western Harbor that are subject to periodic scour and resuspension. These areas are either proximal to actively used docks and associated vessel propeller wash, or subject to peak tidal flows (e.g., the lagoon channel connected to the inner harbor) and nearshore waves.

Question: Are you contending that with sea level rise, etc., the stability will hold?

COMMENT: If Macoma operates in Terminal 7, those sediments will not be stable but rather disturbed.

P. 61

The following exposure pathways were considered in establishing the SCLs:

• Protection of human health via direct contact with intertidal sediments.

• Protection of human health and higher trophic levels via consumption of seafood.

• Protection of benthic species in sediments

COMMENT: If Ecology is concerned about seafood, the animals themselves – organs and meat – and their habitat must be tested for plastics of any size and PFAS.

0-10 CM C=~.4in) is very superficial. Go deeper.

P. 64 What is “hill tipping”? …may be modified using hill-topping, interpolation, and other methods consistent with those used in the RI/FS (WPAH Group 2020).

Pp64-5

3.2 Remedial Action Objectives

Remedial action objectives (RAOs) define what must be achieved by the cleanup to ensure the attainment of project goals and to address concerns defined in the CSM (WPAH Group 2020). The RAOs for the cleanup actions include the following:

September 2024 Cleanup Action Plan

Page 3-6

• Achieve SCLs that protect against benthic toxicity and bioaccumulative risks for

human health within an acceptable restoration time frame throughout the SCU.

• Identify potential contaminant migration pathways for further consideration by

Ecology to prevent sediment recontamination at levels of concern relative to SCLs.

• Develop cleanup actions that minimize measurable adverse impacts on operations

and navigational uses within the working Harbor during construction or in the long-

term.

• Balance the overall environmental benefit of reducing contaminant concentrations in

surface sediments with the potential for impact on cultural resources, aquatic habitat,

and/or the existing benthic community resulting from implementation of the cleanup

actions

More energy and expense will be expended over the years by capping and monitoring, when it would be less expensive to remove all the contaminants in the beginning. Mitigations of covering up make no sense.

In areas of minimized benthic life, eelgrass here and elsewhere could very well revitalize by removing all the contaminants, not smothering more benthic life, and giving eelgrass regrowth a chance.

In sum,

• Review Region 10 EPA findings for additional contaminants.

• Include PFAS and other known contaminants to monitor measure and remove.

• At the outset, remove all the contaminants instead of capping and monitoring for years and maybe having to recap or just remove later.

This is a less expensive path for the use of public and private funds.

• Place signage around cleanup areas to protect the public.

Respectfully submitted,

Darlene Schanfald

Darlene Schanfald

Olympic Environmental Council

Project Coordinator,

Rayonier Mill-Port Angeles Harbor Hazardous Waste Cleanup Project

PO Box 2664

Sequim WA 98382

1-360-681-7565

Comment 16: Sextro, Robert on behalf of the North Olympic Group of Sierra Club

Sumit date: February 16, 2025
Submit method: Website

Comments on the draft Cleanup Action Plan (CAP) of September 2024

These comments and concerns are from the North Olympic Group of Sierra Club located in Clallam county where several hundred of our members live and recreate in Port Angeles. We appreciate the opportunity to comment on this draft plan for the "clean-up" of the western harbor in Port Angeles.

The goal of these planned actions should be to remove contaminants (in this case mostly in the sediments) to the maximum extent practical and to ensure permanence at a reasonable cost.

We appreciate that Ecology, in consultation with the tribes, has selected a different remedy for Sediment Management Area (SMA) 2, that being alternative 2-D instead of the RI/FS selected alternative 2-E. As stated in table 4.2 of the draft CAP this reevaluation of the alternative was also quantitatively supported with the incremental costs lower than the incremental benefits.

However, we disagree with Ecology's selection of alternative 1-D for SMA 1 and prefer alternative 1-C since this alternative (1-C) is more protective, more permanent, and more effective over the long-term (score of 3.5 versus 3.0 for 1-D) at a reasonable cost. We request Ecology prepare a more quantitative table (similar to table 4.2) such as was done for SMA 2 so that we can review the incremental benefit versus the incremental costs.

After finalization of the CAP we understand the next steps from 2025 to 2027 include preparation and approval (including comments from the public) of a design sampling plan and then actually preforming the sampling and analyses proposed in each SMA. Please advise if the purpose of these post RI samples include confirming the breath, depth and type of contaminated media prior to full remedial design? Additionally, will the results of this sampling and analyses be summarized and discussed in an engineering analysis/report available for public review?

Finally, an additional exposure pathway to consider: since the harbor area maps in this report and in the public meeting presentation slides show that extensive portions of the harbor, especially in SMA 3, have contaminated sediments, does the Port district and/ or the City of Port Angeles/Harbor master warn private or commercial vessels of the risk and potential exposure of anchoring in these contaminated sediments and then retrieving the anchor and rode along with attached sediment? Additionally, has the risk of dropping these, sometimes, very heavy anchors, into contaminated sediment ,that will then be partially re-suspended into the harbor's waters, been evaluated? Similarly, is Ecology aware of warnings or postings for kayakers or divers that may enter the SMA 1 area to recreate?

Comment 17: Spees Dr., Karl

Sumit date: January 27, 2025
Submit method: Email

Connie Grovern -DOE Site Mgr <Connie.Groven@ecy.wa.gov>

Connie Groven - Site Manager

WA DOE

PO Box 47775

Olympia, WA 98504-7775

Credentials: Karl E. Spees, MD - Senior Student of History and Natural History, **Scientist,** WA State Master Hunter (certificate-expired), Past President of CAPR 13, Three Decade Resident of the North Olympic Peninsula

My comment to the DOE (Dept. of Ecology) the first time has been misplaced. The **record of my comments appears to be missing at least two significant points**. Thus I will take a second swing at the pinata.

The DOE needs to invest in some simple warning signs and plant them along the shoreline in the areas of interest. **"Don't Eat the Dirt"**. This follows Rush's Rule. Illustrate the Absurd using Absurdity.

Saul Alinsky's Rules for Radicals Rule # 5: There is no defense for Ridicule.

(An explanation of this comment was omitted from my first effort. Without my consent it has been edited out of my original comment. What else did the DOE agent/agents selectively omit?)

As author, Gov., Prof., Dr. (PhD) Dixie Lee Ray knew and wrote about, **NATURE has a tremendous ability to heal itself.** The damage of **polluting the harbor** has been identified and **discontinued many decades ago.** The sands of time have largely healed the injury. 10,000 years from now the area of pollution will be a thin line of sediment in a rock or mud bank. It may even still be toxic. The admonition "don't eat the dirt" will still be cogent. (This opinion concedes the DOE premise: there once was a significant problem in the PAWA harbor.)

Most of the toxic debris has already been buried, eroded, diluted, and/or washed out to sea where it will be further broken down into harmless nutrients or buried as harmless dilute sediment.

The fish, crabs, fauna and flora in the PAWA Harbor are now safe to eat and are not poisoned by the scarce toxic residue. (There are better places to harvest sea weed for human consumption. Plant life is the lowest link in the food chain and most likely to be affected by contaminants.)

Elements like mercury have used and have taken-on a hysterical associations with this **attack on our current Western Civilization.** Mercury was not created by man but is a naturally occurring element. It is very expensive which means it was used and abused sparingly in harbor industry. (Mercury was/is used in silver amalgams in dentistry for over 150 year. For those of us over 60 y/o we probably still have stable high concentrations of harmless mercury in our teeth, aka dental repairs.) Rationalizing 'the taking-out of beneficial use' the most valuable real estate on the North Olympic Peninsula using flawed reasoning and poor logic should help **expose underlying anti-Western Civilization 'social engineering'** (aka Rewilding Agenda) perpetrated on the citizens of the city, county, and State. **The risks and benefits of immediately putting back into beneficial public use this valuable asset** should be analyzed using science not a surreptitious political agenda. Policy needs to be made by the Electorate, not a bunch of inbred, partisan, ideological, brainwashed, academic lightweights.

Speaking of the political appointments in the DOE. The WA State Ruling party has taken on a pseudo-religious character. One of the essential sacraments of this party's pseudo-religion and belief system is the belief that Plant Food aka CO2 is a dangerous 'Greenhouse Gas'. (This is an easily scientifically theory aka belief to be debunked by fundamental geology, geography, physics, biology, and chemistry; a job for another day.) If any man, woman, or 'it' in the DOE was in denial of this delusion they would immediately receive a pink slip. False beliefs are an essential requirement of the Radical Environmental DOE membership / employment.

Rationalization the paralyzation of beneficial use of the PAWA (Port Angeles, WA) harbor shoreline using Mercury (Hg) should viscerally weaken the whole false premise of the DOE mission that there is a compelling need to take further actions at great expense to the public and our nation.

These are the two essential points made in my first comments which appear to be missing. It is unnecessary to repeat the lengthy original critical comment.

Karl E. Spees, MD (retired and tired)

*****

Connie Goven- Site Mgr DOE Cleanup of the Port Angeles K-Ply Site April 2015 WA State Constitution Article 1 Section 1 - Political Power: All political power is inherent in the people, the government derive their just power from the governed, and are established to protect and maintain

individual rights. Article 1 Section 4 - Personal Rights: No person shall be deprived of life, liberty, or property without due process of law.

[Ecology also received a mailed version of this comment, available on the next page]

Sumit date: January 30, 2025
Submit method: Mail

Connie Grovern -DOE Site Mgr <Connie.Groven@ecy.wa.gov>
Connie Groven - Site Manager
WA DOE
PO Box 47775
Olympia, WA 98504-7775

Credentials: Karl E. Spees, MD - Senior Student of History and Natural History, **Scientist,** WA State Master Hunter (certificate-expired), Past President of CAPR 13, Three Decade Resident of the North Olympic Peninsula

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Elements like mercury have used and have taken-on a hysterical associations with this **attack on our current Western Civilization.** Mercury was not created by man but is a naturally occurring element. It is very expensive which means it was used and abused sparingly in harbor industry. (Mercury was/is used in silver amalgams in dentistry for over 150 year. For those of us over 60 y/o we probably still have stable high concentrations of harmless mercury in our teeth, aka dental repairs.) Rationalizing 'the taking-out of beneficial use' the most valuable real estate on the North Olympic Peninsula using flawed reasoning and poor logic should help **expose underlying anti-Western Civilization 'social engineering'** (aka Rewilding Agenda) perpetrated on the citizens of the city, county, and State. **The risks and benefits of immediately putting back into beneficial public use this valuable asset** should be analyzed using science not a surreptitious political agenda. Policy needs to be made by the Electorate, not a bunch of inbred, partisan, ideological, brainwashed, academic lightweights.

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Karl E. Spees, MD (retired and tired) 1/27/25
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Comment 18: Stephanz, Nancy

Sumit date: January 24, 2025
Submit method: Website

Please make sure that the companies that profited by polluting our bay pay the total cost necessary to clean it up, whether it is done in the projected six years or takes longer. And please keep the public updated on the progress being made as the cleanup goes along.

I am also thinking that no one should plan to eat any crabs or shellfish or fish harvested in the bay while the initial removal of contaminated sediment is underway. I just cannot imagine that the creatures that live in that water and sediment willl not be contaminated as well by all the pollutants stirred up during the sediment removal process. Please ask the WA Dept. of Health to more closely (than usual) monitor toxins in those food sources while this cleanup is underway. The companies should have to pay the cost of that extra monitoring as well.

Nancy Stephanz, MD, Port Angeles resident

Appendix B:

Summary of Outreach

Ecology's public involvement activities related to this comment period (January 16 – February 18, 2025) included:

Postcard and Fact Sheet

- **Mailed Notices:** Ecology sent two separate mailers to 987 nearby addresses, including homes and businesses. These two printed mailers included:
    - Multi-page factsheet summarizing the cleanup and comment period.
    - Postcard update about the public meeting and open house event.
- **Email Updates:** Ecology emailed updates to SEPA review agencies, local interest groups, and those subscribed to Ecology's Port Angeles Cleanups email notification group. Subscribe online[4] to receive future email updates.
- **Online Access:** Mailers were also posted on Ecology's Western Port Angeles Harbor webpage.[3]

Legal Notice

- Publication of one paid display ad in Peninsula Daily News, dated January 16, 2025.

Site Register

- Ecology published three notices in its *Contaminated Site Register*.
    - **Comment Period Notices:**
        - Contaminated Site Register for – January 23, 2025
        - Contaminated Site Register for – Feburary 6, 2025
    - **Response Summary Notice:**
        - Contaminated Site Register for – October 2, 2025
- Visit Ecology's Site Register website[18] to download PDFs.

Media Notification

- Ecology sent a media notice on Tuesday, January 14, 2025, to the:
    - Peninsula Daily News,
    - Sequim Gazette,
    - KONP/KIKN,
    - Kitsap Daily News,
    - Kitsap Sun, and the
    - Seattle Times.

[18] https://apps.ecology.wa.gov/publications/UIPages/PublicationList.aspx?IndexTypeName=Program&NameValue=Toxics+Cleanup&DocumentTypeName=Newsletter

Media Coverage

- The *Peninsula Daily News* published an article[19] titled "Comment period to open on Port Angeles Harbor cleanup" on January 16th, 2025.

Social Media

- On Friday, January 17, 2025, Ecology's Southwest Regional Office posted a story on Ecology's blog[20] titled "Western Port Angeles Harbor cleanup is moving forward."

Public Meeting and Open House

- Ecology hosted an in-person meeting and open house on Wednesday, February 5, 2025, at 6:00 p.m.
- Forty-nine individuals signed in at this event.
- Ecology staff presented details on the Consent Decree, Draft Cleanup Action Plan, and SEPA documents. Ecology staff also answered questions about the site.

Presentation Recording

- Ecology staff created a recorded video recording of the presentation given during the public meeting and open house. The recording[14] is available on Ecology's YouTube channel.
- Ecology emailed notification of the recording link and presentation slides to 562 people, including interested individuals, local/county/state/federal agencies, neighborhood associations, and interested community groups.

Websites

- Ecology updated its Western Port Angeles Harbor cleanup website. This update included:
    - Information about the public comment period.
    - Information about the public meeting event and presentation recording.
    - Posting the fact sheet, outreach postcard, and documents available for public review.
- These materials were also listed on Ecology's Public Inputs & Events webpage.[21]

Document Repositories

- Printed documents were available for public review at two document repositories:
    - **Port Angeles Library**: 2210 South Peabody St Port Angeles, WA 98362; 360-417-8500.

[19] https://www.peninsuladailynews.com/news/comment-period-to-open-on-port-angeles-harbor-cleanup/
[20] https://ecology.wa.gov/blog/january-2025/western-port-angeles-harbor-cleanup-is-moving-forward
[21] https://ecology.wa.gov/Events/Search/Listing

    - **Ecology Lacey Office** (by appointment only): 300 Desmond Drive SE Lacey, WA 98503; PublicDisclosureSWRO@ecy.wa.gov or 360-407-6365.

- Documents are available online on Ecology's Western Port Angeles Harbor webpage.[3]