



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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April 27, 2026

Stephanie Barnie
Department of Ecology
Shorelands and Environmental Assistance (SEA) Program
PO Box 330316
Shoreline, WA 98133-9716

Re: Jeld Wen – Compliance with Shoreline Management Act

Site Name:	Jeld Wen
Site Address:	300 W Marine View Drive, Everett, WA 98201-1030
Cleanup Site ID:	4402
Facility Site ID:	2757
Agreed Order No.	DE 5095

Dear Stephanie Barnie:

The purpose of this letter is to provide clarification on cleanup plans at the Jeld Wen site. Ecology's Toxics Cleanup Program (TCP) considers the cleanup of this site to be of critical importance due the presence of present bioaccumulative toxic (PBT) substances in sediments such as dioxin/furans (DFs), polychlorinated biphenyls (PCBs), and polycyclic aromatic hydrocarbons (PAHs). The work on developing and implementing cleanup plans has been a long road, with the following key deliverables over the past 18 years:

- 2008-2021 – Remedial Investigations
- 2016-2021 – Feasibility Study evaluations and alternatives screening
- 2021-2023 – Cleanup Action Plan (CAP) development and finalization
- 2024 – Stage 1 Pre-Design Data Investigations
- 2025 – Stage 2 Pre-Design Data Investigations
- 2026 – Design Development and Engineering Design Report (EDR)

The project is currently at 60% design, with a revised marine EDR close to completion. Next steps will be 90% design, 100% design, then contractor selection and construction. A key step of getting to the 90% design completed is identifying and designing for any substantive requirements of applicable state and local laws. Note the Model Toxics Control Act (MTCA) provides an exemption from procedural requirements of those laws but does require adherence to substantive requirements of those laws.

TCP, in coordination with Jeld-Wen, the Potentially Liable Party (PLP) for this cleanup project, identified the Shoreline Management Act and City of Everett Shoreline Master Program (SMP) as applicable to the project based on location. TCP and Jeld-Wen's consultants have been working to engage the City of Everett and the Shorelands and Environmental Assistance (SEA) Program to obtain written documentation regarding substantive requirements of the SMA/SMP, as required by WAC 173-340-710(9)(d) ('Permits and exemptions').

TCP and Jeld-Wen's consultant have also been in consultation with other entities with jurisdiction over shoreline habitat and protected/priority species, including the Tulalip Tribes, the Washington Department of Fish & Wildlife (WDFW), the U.S. Army Corps of Engineers – and in turn, the National Marine Fisheries Service (NMFS) and U.S. Fish & Wildlife Service, regarding mitigation actions for in-water and shoreline cleanup activities.

The consultant for Jeld Wen has been working toward a schedule of beginning construction of the marine remedy in October 2026; however, this schedule does not appear to likely be practicable since substantive requirements from the various regulatory agencies that could affect design have not yet been fully identified. However, we are all eager for the cleanup work to begin as soon as possible. Based on in-water work windows, some work could start in late 2026; however, we anticipate most cleanup work will begin 2027.

Shoreline habitat enhancements along portions of this site are difficult for a variety of reasons. Part of the difficulty originates from the origin of the peninsula where the cleanup site is located. This human-made peninsula is not consistent with the natural shoreline in the area. It currently has a shoreline consisting largely of degraded and broken asphalt, which serves to armor it to some degree, but is a contamination concern of its own right (asphalt is a source of PAHs in the environment). Ecology's TCP has been working with various parties to identify potential shoreline improvements that could be integrated with the cleanup since the CAP was developed in 2021-2023. This has included engagement with the Tulalip Tribes, which is also eager to have as natural and fish-friendly shorelines as possible.

Around 2024, the question of the need for shoreline armoring and potential mitigation was looked at with NMFS. NMFS concluded that if shoreline armoring was needed for the protection of the MTCA remedy, then no mitigation would be required under its jurisdiction of the Endangered Species Act and Magnuson-Stevens Act. Ecology's TCP requested that Jeld Wen conduct additional investigations to provide data regarding the need for shoreline armoring to protect the remedy. Ecology also requested a wind-wave analyses, which was conducted and is included with the EDR.

Ecology suspected that DFs in shallow soils were present at elevated concentrations throughout the peninsula and requested sampling to verify this. Sampling was conducted and found a high incidence of DFs in soil at concentrations above MTCA cleanup levels in all areas that were sampled. Therefore, armoring was determined necessary to prevent further contamination migrating into the marine setting, primarily through erosion of contaminated shoreline soils. However, Ecology TCP has endeavored to minimize the need for armoring to the extent possible and found that the knoll portion of the site did not need to have armoring to protect the MTCA remedy.

The cost for the more permanent alternative (removal of all contaminated soils) was concluded by Ecology's TCP to be disproportionate (MTCA requires implementation of the most permanent alternative that is not disproportionate in costs compared to incremental benefits). Note the CAP went through a public review and comment period prior to finalization.

In addition to the shoreline armoring along the peninsula, a cap is needed throughout the peninsula to prevent suspended solids from migrating to the marine environment. Most of this industrial peninsula is currently capped with asphalt. Cleanup plans include completion of the capping and implementing a cap inspection plan to ensure that this pathway is continually addressed.

Ecology's TCP understands the need to optimize shorelines to the extent possible. We would urge in reviewing compliance with the SMA to emphasize the critical nature of the contamination cleanup and to recognize that shoreline armoring around the peninsula and capping of the peninsula are critical components of this cleanup work. TCP would be supportive of any shoreline enhancements that could be integrated with the capping and containment that is needed to prevent further migration of contamination into the marine environment.

Ecology's TCP appreciates the efforts of Ecology's SEA program in working to improve shorelines within the State of Washington and we look forward to your thoughts on how shoreline enhancements can be integrated with the cleanup project. We also look forward to Jeld Wen's receipt of substantive requirements for the SMA as well as substantive requirements from the other regulatory entities so that cleanup beginning in 2027 will not be delayed.

Sincerely,



Frank P. Winslow, LHG
Toxics Cleanup Program
Headquarters Section

cc: Susannah Edwards, Ecology TCP
Ryan Hardwick, Ecology TCP
Josh Morman, Ecology TCP
Erik Snyder, Ecology TCP