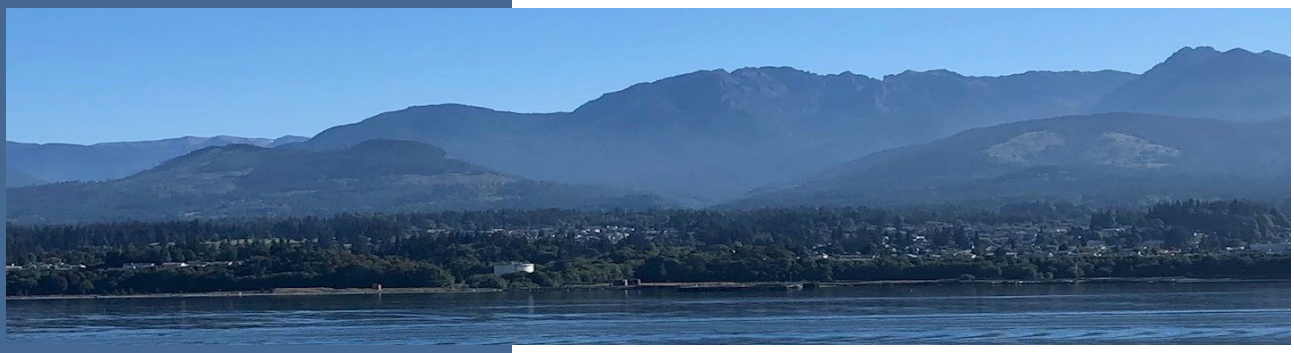


Responsiveness Summary

Port Angeles Rayonier Mill

Cleanup Site ID: 2270
Facility ID: 19
Address: 700 N Ennis Street, Port Angeles
County: Clallam

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

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List of Abbreviations and Terms

bgs	below ground surface
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
cm	centimeters
cPAH	carcinogenic polycyclic aromatic hydrocarbons
Creosote	name used for a variety of products (wood creosote, coal tar creosote, coal tar, coal tar pitch, and coal tar pitch volatiles). These products are mixtures of many chemicals created by high-temperature treatment of beech and other woods, coal, or from the resin of the creosote bush. Creosote-treated wood is a source of polycyclic aromatic hydrocarbons (PAHs).[2]
CSM	conceptual site model
cy	cubic yards
DCA	disproportionate cost analysis
DNR	Washington State Department of Natural Resources

[2] https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/dangerous-waste-guidance/common-dangerous-waste/treated-wood-waste

EJScreen	Environmental Protection Agency's Environmental Justice Screening and Mapping Tool
EMNR	enhanced monitored natural recovery
IAP	interim action plan
IC	institutional control
IHS	indicator hazardous substance
M	million
MMP	materials management plan
MTCA	Model Toxics Control Act
PAH	polycyclic aromatic hydrocarbon
PCB	polychlorinated biphenyl
PFAS	per- and polyfluoroalkyl substances
PMEP	permanent to the maximum extent practicable
RAMP	Rayonier A.M. Properties LLC
Rayonier	Rayonier, Inc.
RCW	Revised Code of Washington
RI	remedial investigation
SVOCs	semi-volatile organic chemicals
TEE	terrestrial ecological evaluation
TPH	total petroleum hydrocarbons
Trustee Council	Port Angeles Harbor Trustee Council
Unrestricted land use	use restrictions are not required to protect human health or the environment if unrestricted use cleanup levels are met at the point of compliance. The unrestricted use cleanup levels are based on the reasonable maximum exposure expected to occur under both current and future site use conditions. Residential use is generally the site use requiring the most protective cleanup levels, and it represents the reasonable maximum exposure.
USEPA	United States Environmental Protection Agency

VOCs	volatile organic chemicals
WAC	Washington Administrative Code

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What Ecology found

We received 386 comments from 359 commenters during the comment period about the Port Angeles Rayonier Mill cleanup project. The top concerns were:

1. Commenters want a full removal of contaminated soil to an offsite facility.
2. Commenters have concerns that the selected soil cleanup remedy is inadequate.
3. Commenters have financial concerns, which include concerns about the disproportionate cost analysis.

Using this information, and working to solve these top concerns, if possible, Ecology re-evaluated and explored a variety of ideas and proposals that we found in the comments. We evaluated these proposals against our cleanup authority, the Model Toxics Control Act (MTCA), and guidance for selecting and implementing cleanup solutions to make sure we did our due diligence on this complicated cleanup proposal.

Ultimately, Ecology cannot require a full removal of contaminated soil to an offsite facility (Alternative SL5), as it is not the permanent to the maximum extent practicable (PMEP) remedy as required under MTCA. According to MTCA, Ecology must select a cleanup option that is permanent without being disproportionately costly. **This means we are legally bound to continue with the consolidation and capping cleanup remedy (Alternative SL3).**

We acknowledge that for many commenters, this outcome will be disappointing. However, we believe this cleanup will address the key concerns brought to us during this comment period, as the cleanup is safe, protective, and will allow for a variety of future uses of the study area.

This responsiveness summary will explain the regulatory limitations we face and provide more details about the cleanup moving forward. We hope this document helps clarify how we considered public concerns. We acknowledge and appreciate the patience of the Port Angeles community as we responded to public comments and developed this responsiveness summary.

2025 Public Comment Period Summary

Ecology held a public comment period for the Port Angeles Rayonier Mill cleanup project from June 12 to August 12, 2025. Ecology held this public comment period to gather feedback on three documents that will move the project into its next phases of cleanup. A summary of these documents is below:

- **Consent Decree:** To move the cleanup forward, Ecology will enter into a legal agreement (called a consent decree) with the parties responsible for cleanup: Rayonier A.M. Properties LLC (RAMP) and Rayonier Advanced Materials (RYAM). The consent decree will be entered as an Order of the Clallam County Superior Court and require RAMP and RYAM to carry out Ecology's Interim Action Plan.
- **Interim Action Plan (IAP):** This is Ecology's proposed cleanup plan for the study area, a portion of the site. It includes a schedule and cleanup requirements.
- **State Environmental Policy Act (SEPA) Determination of Nonsignificance:** This documents Ecology's determination that the proposed cleanup likely won't cause significant environmental harm. We considered environmental, historical, and cultural factors in this process.

Ecology also hosted a public meeting and an open house event. This event took place at the Field Arts & Events Hall on July 8, 2025, from 5-8 p.m. A recording of the presentation given during this event is available on Ecology's YouTube channel.[3] You can find a full overview of Ecology's public involvement efforts during this comment period in Appendix A, page 42.

During the public comment period, we received **386 comments from 359 commenters**. You can find a list of commenters and all the comments we received during the comment period in Appendix B, page 46.

What Ecology did after the public comment period

After the public comment period ended, Ecology reviewed and considered all comments. We acknowledge and understand that many commenters were not satisfied with the cleanup alternatives we selected in the Interim Action Plan. We heard a variety of concerns, especially about the future implications of leaving contaminated material at the site under a two-foot soil cap, and the benefit-cost analysis we used to compare cleanup options.

[3] https://www.youtube.com/watch?v=GkQrn9GW7O8

We considered public feedback in key areas, which included:

- We reanalyzed the Disproportionate Cost Analysis (DCA) that was originally used to determine the soil cleanup remedy that is permanent to the maximum extent practicable (PMEP). According to MTCA, Ecology must select the cleanup remedy that is PMEP. We considered the recommendations that the City of Port Angeles' consultant, Integral, offered. **The findings show that the PMEP solution is still Alternative SL3.** You can find more details about this reanalysis and how we came to that conclusion in Appendix C, Ecology's 2026 Re-Evaluation of Disproportionate Cost Analysis for Soil Alternatives.[4]
- We explored alternative disposal locations for the contaminated soil and sediment that otherwise would be consolidated and capped. This included talks with the City of Port Angeles, Lower Elwha Klallam Tribe, the Clallam County Environmental Health Services, and Ecology's Solid Waste Management Program. **These conversations concluded that disposing of this waste off the site at an appropriate and local landfill is not feasible.**
- We worked with consultants at Moffatt & Nichol Engineers to assess risks related to climate change and natural disaster, informed in part by public concerns. Moffatt & Nichol is a leading U.S.-based global infrastructure firm. They are a multidisciplinary team of engineers, planners, and scientists specializing in planning and designing facilities that support coastlines, harbors, rivers, and freight movement. **Many of the concerns brought by commenters will be carefully considered during the cleanup design.** This project will follow mandatory climate and natural disaster risk management procedures while designing cleanup to minimize risks.

We made minor changes to the documents:

After taking these actions, we determined we didn't need to make major changes to the documents. However, we made some minor updates to the documents after this public comment period. These include:

- Updating the Interim Action Plan from "public review draft" to "final."
- Adding a reference to the DCA Memo and a summary of the DCA Memo to the Interim Action Plan.

[4] https://apps.ecology.wa.gov/cleanupsearch/document/172137 (download link; 243KB)

Next steps

Ecology will sign the consent decree, and work will move forward according to the work schedule in the Interim Action Plan.

This cleanup is now in the "Design the cleanup" step (see Figure 1). RAMP hired consultants to conduct remedial design sampling to refine the boundaries for the cleanup elements. RAMP will draft an engineering design report. Ecology closely oversees all sampling work, data collection, and analysis.

We expect engineering design to take about five years to complete. This timeline is due to the cleanup's complexity and size, and the amount of additional remedial design sampling that is required. The engineering design will likely be completed in phases, with studies being completed first and then used to develop different reports and design plans.



Figure 1: The steps of Washington's cleanup law, the Model Toxics Control Act.

Stay informed

Typically, public comment periods do not take place during the "design the cleanup" and "cleanup the site" steps. Ecology will share updates on the reports and cleanup progress with the community. The public is always welcome to share their thoughts, concerns, and priorities with Ecology throughout the cleanup design.

To receive Ecology updates regarding the Port Angeles Rayonier Mill cleanup, you can:

- Subscribe to Ecology's Port Angeles Cleanups email notification list.[5] We use this list to send email updates on our cleanup work in Port Angeles. We also send information on local outreach events Ecology will host.

[5] https://public.govdelivery.com/accounts/WAECY/subscriber/new?topic_id=WAECY_343

- Subscribe for updates on Ecology's Port Angeles Rayonier Mill webpage.[6] Subscribers receive a weekly email when there's an open comment period, a new document, or other cleanup news. For more information, visit Ecology's blog.[7]

Additional context about the Port Angeles Rayonier Mill cleanup

Who is financially responsible for the cleanup?

Under MTCA, current owners or operators of contaminated property as well as owners and operators at the time of contamination may be named as potentially liable persons (PLPs). Rayonier, Inc. owned and operated the former Rayonier Mill and was named a PLP in 2001. In 2004, Rayonier, Inc. conveyed property ownership to Rayonier Properties, LLC, a wholly owned subsidiary, which Ecology named a PLP in 2009. When Rayonier, Inc. split into Rayonier, Inc. and Rayonier Advanced Materials (RYAM) in 2014, the subsidiary moved to RYAM and was renamed Rayonier A.M. Properties LLC (RAMP). As a result, RYAM and RAMP are the PLPs for the site.

This responsiveness summary uses "Rayonier, Inc." when referring to activities that occurred prior to 2014. We use RAMP when referring to activities after 2014 as well as current and future obligations for implementing cleanup, and we use "former Rayonier Mill" when referring to the site. RAMP funded the contamination investigation under a legal agreement with Ecology, and in 2025, RYAM and RAMP[8] signed a consent decree to implement and fund the cleanup.

Previous cleanup actions removed contaminated soil

Rayonier, Inc. completed several interim actions in the early 2000s, removing approximately 30,000 tons of contaminated soil from specific areas of the property. Because most of the material met the requirements for disposal at a permitted Subtitle D landfill, it was disposed of at the City of Port Angeles Sanitary Landfill. Petroleum-contaminated soil was transported to a treatment facility in the Tacoma area, and PCB-contaminated soil was transported to a Toxics Substances Control Act (TSCA)-permitted Subtitle C landfill in Arlington, Oregon.

The contaminated soil that remains is a concern for humans and wildlife if they have direct contact. The contaminated soil does not pose a threat of leaching to groundwater.

[6] https://go.ecology.wa.gov/2270
[7] https://ecology.wa.gov/blog/may-2025/updates-on-cleanup-sites-in-your-inbox
[8] RAMP and RYAM are referred to collectively throughout as "RAMP."

Overview of comments received

We appreciate the time people took to submit thoughtful comments during the comment period. We carefully considered each comment while conducting our review and researching the solutions within our legal bounds.

Topics of concern

We received hundreds of comments. Ecology used AI during an initial review to flag major concerns and suggest general categories.[9] Ecology staff then personally read every comment. Ecology staff made final determinations of what topics of concern were associated with each comment.

This responsiveness summary is ordered according to the frequency of each topic of concern.

1. **Want full removal of contaminated soil to an offsite disposal facility**
    - Support for City of Port Angeles position
    - Disproportionate Cost Analysis (DCA)
2. **Soil cleanup remedy (Alternative SL3) is inadequate**
    - Health risks
    - Environmental risks
3. **Financial**
    - Disproportionate Cost Analysis (DCA)
    - Support for City of Port Angeles position
    - Distrust
4. **Restoration and Ennis Creek**
    - Ennis Creek
    - Regional improvements
5. **Cleanup logistics**
    - Final cleanup
    - Full scale of cleanup
    - Olympic Discovery Trail

[9] Ecology staff used ChatGPT, via Ecology's trial agency accounts, in September 2025 to support an initial review of comments and key themes. This early analysis was not intended to be comprehensive; instead, it served as a starting point for staff as they conducted a deeper review of the comments and identified major themes, concerns, and community priorities. Ecology staff did not use AI to analyze the comments after this initial review. The purpose of using AI during the initial review was to give staff a baseline that could help them more efficiently spot topics of concern while reading through the full set of comments. All topics and associated comments were then further reviewed and vetted by Ecology staff before any findings were finalized.

- Sediment cleanup
- In-water structures
- Mt. Pleasant Landfill

6. **Cleanup is taking too long**
7. **Accountability for RAMP**
    - Ecology responsibility
8. **Future use of the site**
    - Olympic Discovery Trail
9. **Damages to Port Angeles**
    - Port Angeles deserves better
    - Superfund sites
    - Unfair treatment of Port Angeles
    - Health risks
10. **Intergenerational and environmental justice**
11. **Climate change and natural disaster risks**
12. **Public involvement and distrust**
13. **Cultural resources and Tribal rights**

Topics of concern frequency in comments

Figure 2 is a bar chart showing the topics of concern and the number of times they were mentioned in the comments we received. The most mentioned topic was "Want full removal of contaminated soil to an offsite disposal facility," with 343 mentions in comments.

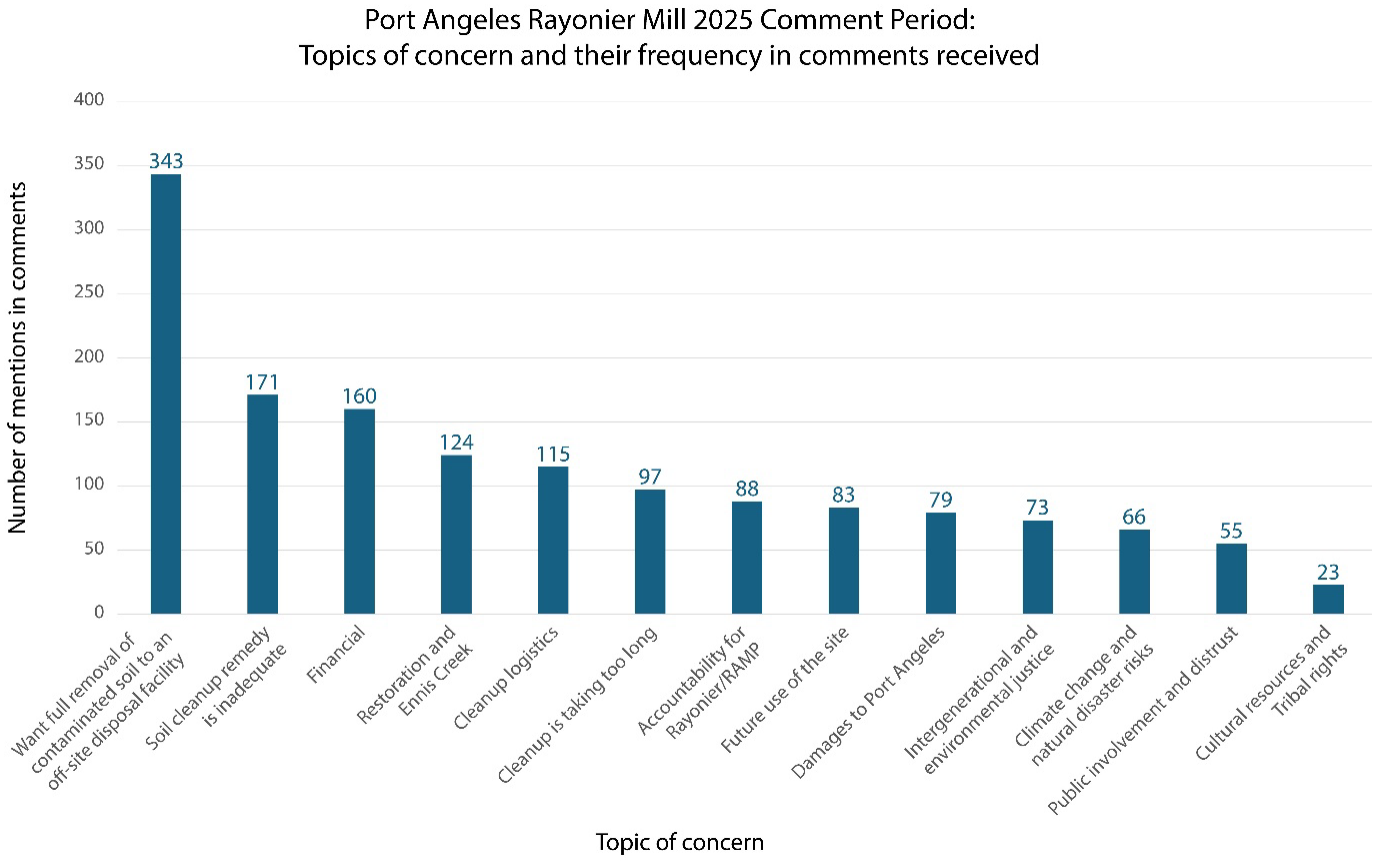


Figure 2: Topics of concern shared by the public during the comment period and the number of times they are mentioned in comments.

Ecology's response to each comment topic of concern

1. Want full removal of contaminated soil to an offsite disposal facility

Description

RAMP developed a feasibility study for the site in 2019.[10] This feasibility study evaluated five different soil cleanup alternatives. Two of these evaluated soil cleanup alternatives, Alternatives SL3 and SL5, were the focus of many comments we received. These two alternatives are summarized below:

- **Alternative SL3** consolidates all soil contaminated above unrestricted use cleanup levels into the west mill area and covers it with a 2-foot cap of clean soil. The 2019 cost for SL3 is $10 million (M).
- **Alternative SL5** is the full removal of all contaminated soil above unrestricted use cleanup levels to an offsite disposal facility. The 2019 cost for SL5 is $37M.

Many commenters requested that Ecology select Alternative SL5 as the final soil cleanup remedy, with roughly 89% of commenters requesting that all contaminated materials be removed from the site. Many commenters specified that all contaminated soil must be removed from Port Angeles altogether and transported to a facility in eastern Oregon or Washington. They wanted this rather than the proposed Alternative SL3, with many commenters indicating that anything less than a full removal would be unacceptable.

Many commenters also supported the Port Angeles City Council's vote to support a full-removal cleanup at the site.[11] Commenters referenced the slide show presentation by the City's consultant, Integral, which laid out recommendations for Ecology to reconsider certain costs and benefits in the DCA.

Response

Ecology acknowledges the strong response from community members and their preference for Alternative SL5. As requested, we re-evaluated the disproportionate cost analysis and explored other potential soil disposal options that might be used to achieve the full removal alternative.

However, after re-evaluating and exploring a variety of ideas and proposed solutions from the comments, Ecology didn't find the regulatory justification to change the soil

[10] https://apps.ecology.wa.gov/cleanupsearch/document/85323 (download link; 52.6 MB)
[11] https://cityofpa.us/CivicAlerts.aspx?AID=1880&ARC=3448

cleanup remedy from Alternative SL3 to SL5. The subsections below further explain the reasoning behind this determination.

Regulatory requirements in selecting cleanup remedies

Under MTCA, cleaning up contaminated sites must not only be protective, but also "use permanent solutions to the maximum extent practicable."[12] To select the remedy which is "permanent to the maximum extent practicable" (PMEP), we review a disproportionate cost analysis (DCA).

The DCA compares the costs and benefits of different cleanup remedies. 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.

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. **If a more permanent option is significantly more expensive but provides only slightly more benefit, it may be considered disproportionately costly and not selected.**

Updates to Ecology's regulatory processes

Recently, two updates took place that revised how we consider cleanup options:

- In 2024, Ecology's revisions to the MTCA Cleanup Rule, Chapter 173-340 WAC, went into effect.[13]
- In 2025, Ecology published new guidance for conducting a PMEP evaluation, Guidance for Making Cleanups Permanent to the Maximum Extent Practicable (PMEP).[14]

To learn more about permanent and non-permanent cleanups, visit Ecology's Evaluating cleanup options webpage[15] or download the focus sheet Making cleanups as permanent as practicable.[16]

When RAMP completed the public review draft of the feasibility study in 2019, the DCA followed regulations as they existed at that time. Ecology used the outcomes from that

[12] RCW 70A.305.030(1)(b); https://app.leg.wa.gov/rcw/default.aspx?cite=70A.305.030
[13] https://app.leg.wa.gov/wac/default.aspx?cite=173-340
[14] https://apps.ecology.wa.gov/publications/summarypages/2509059.html
[15] https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/contamination-cleanup-tools/evaluating-cleanup-options
[16] https://apps.ecology.wa.gov/publications/summarypages/2509058.html

DCA to select Alternative SL3. Many commenters requested that Ecology re-evaluate the DCA using the 2025 PMEP guidance. In response, Ecology used the 2025 guidance and tool to re-evaluate the soil Alternatives SL3 (consolidate and cap) and SL5 (offsite disposal).

Outcome of the DCA reanalysis

Using the 2025 PMEP guidance tool and the cost and benefit information from the 2019 study, Ecology found that Alternative SL3 still provides a better balance of cost and benefit than Alternative SL5. **After adjusting the numbers based on suggestions from the City of Port Angeles' consultant, Integral, Alternative SL3 still came out as the PMEP option.**

Tables 1 shows the costs and benefits as presented in the feasibility study, and Table 2 shows the adjusted costs and benefits based on Integral's recommendations. The alternative with the lowest cost to benefit ratio is the PMEP alternative, highlighted in yellow. The analysis shows that Alternative SL3 offers the most permanent solution without being disproportionately expensive in both the initial and re-evaluation.

Tables 1 and 2: Tables 1 and 2 compare the DCA results from the 2019 feasibility study (Table 1, left side) and Ecology's 2026 re-evaluation (Table 2, right side).

Feasibility Study costs and benefits		SL3	SL5
Cost ($ in millions)		10.00	37.00
DCA Benefit Criteria	Weight (%)		
Protectiveness	30%	9.0	10.0
Permanence	20%	7.0	9.0
Long-term effectiveness	20%	8.0	10.0
Short-term risks	15%	7.0	5.0
Implementability	15%	9.0	6.0
Total weighted degrees of benefit	100%	8.00	8.80
Cost Effectiveness ($/B)		$1.25	$4.20

Integral's recommended adjustments		SL3	SL5
Cost ($ in millions)		15.00	35.00
DCA Benefit Criteria	Weight (%)		
Protectiveness	30%	9.0	10.0
Permanence	20%	7.0	9.0
Long-term effectiveness	20%	8.0	10.0
Short-term risks	15%	7.0	5.0
Implementability	15%	5.0	10.0
Total weighted degrees of benefit	100%	7.60	9.20
Cost Effectiveness ($/B)		$1.97	$3.80

Appendix C includes Ecology's Re-Evaluation of Disproportionate Cost Analysis for Soil Alternatives Memo.[4] This memo provides in-depth information about the reanalysis and documents the steps we took to complete it.

Outcome of additional sensitivity analysis

An additional sensitivity analysis looked at whether further changes to costs and benefits could lead to SL5 as the PMEP alternative. In theory, this could happen, but the adjustments required are highly unrealistic.

Right now, the cost difference between Alternatives SL3 and SL5 is about $27 million (M). For SL5 to become the PMEP alternative instead of SL3, that difference would need to drop to around $10-11M. This is not realistic for two main reasons:

- The cost reductions that would be needed are not feasible. For example, a contractor could not complete the work for the much lower amounts that would be required.
- Some commenters believe SL3's costs are underestimated and SL5's costs are overestimated. Cost estimates always involve some level of uncertainty, but in this case, any potential inaccuracies are not substantial enough to reduce the difference between the alternatives from $27M to $10-11M.

Because of this, reanalyzing or adjusting the costs does not realistically change the outcome: **SL3 remains the PMEP alternative.**

Additional considerations

Some commenters suggested we explore different approaches that may help change the PMEP outcome. These suggestions included finding different options for offsite disposal locations or transportation methods for contaminated materials.

We explored offsite disposal options

Alternative SL5 was based on hauling contaminated material from the site to a properly licensed disposal facility in eastern Washington or Oregon. The high cost of Alternative SL5 is due to the large volume of soil (nearly 200,000 tons) being hauled a long distance. We can't reduce the volume of contaminated soil that would need to be removed. Instead, we evaluated two other offsite disposal options within or closer to Port Angeles, even though it was not clear whether such options would significantly reduce the cost of offsite disposal.

To do this, we consulted closely with the City of Port Angeles, the Clallam County Environmental Health Services, and the Lower Elwha Klallam Tribe. We also consulted with Ecology's Solid Waste Management Program, which coordinates solid waste and recycling programs in Washington, including landfills.

During these consultations, we discussed the possibility of opening a regional disposal facility on the Olympic Peninsula where contaminated materials from cleanup sites, such as the former Rayonier Mill site, could be safely contained. We determined this option is too speculative to be applied to this cleanup, as it would take considerable public resources and time to implement, involve other factors beyond the scope of the Rayonier Mill cleanup, and likely face public opposition.

In addition, we also discussed the possibility of re-opening the City of Port Angeles Sanitary Landfill, which was closed in 2014, to accept the contaminated soil. This option would require engineering to protect the existing cap over the landfill while opening a cell to take the waste. Given that many commenters (including the City's consultant, Integral)

specified that offsite disposal should be out-of-town in eastern Washington or Oregon, disposal within Port Angeles would likely face public opposition. In addition, our best calculations indicated that the volume of soil and sediment that would be removed under SL5 (or consolidated and capped under SL3) would exceed the remaining capacity of the City landfill. In addition, the City landfill is being considered for receiving contaminated material from the Western Harbor cleanup.

We explored barging options

Barging could be an alternative to trucking for offsite disposal. Barging was considered in the 2019 feasibility study but was deemed cost prohibitive. This is, in part, because the required barge transloading and material handling facilities are not available at the site. Instead, trucking was the mode of transportation priced in the alternatives. The cost for trucking (in 2019 dollars) was $40 per ton. During the final engineering design process, RAMP will identify and select the most efficient and cost-effective mode of transportation for materials being disposed of off-site.

2. Soil cleanup remedy is inadequate

Description

Many commenters said the proposed soil cleanup would be inadequate and does not provide a long-term solution. Others viewed the proposed soil cleanup as a “cover-up” (because of the cap over the consolidation area) rather than a cleanup.

Commenters shared concerns that the proposed cleanup would not sufficiently address health risks and could contribute to future environmental risks, such as contaminants leaching from the capped contaminated soil. There were also questions and concerns about the need for ongoing signage or fencing at the study area.

Response

Previous interim cleanup actions have already removed approximately 30,000 tons of the most contaminated soil. The contaminated soil that remains is a concern for humans and wildlife if they have direct contact.

Additionally, the remaining contaminated soil does not pose a risk to groundwater cleanup standards, which are set to protect the marine environment. This is because the soil contaminants of concern (e.g., dioxins, TPH, cPAHs, and PCBs) have a strong affinity to bind to the soil particles. Since these contaminants adhere tightly to the soil, have low solubility in water, and are chemically stable, they are not prone to leaching or migrating. These contaminants will stay fixed in place after being capped, stubbornly bound to the soil particles. More information is provided on page 17.

SL3 (consolidate and cap contaminated soil) is protective and meets the legal requirement to be permanent to the maximum extent practicable. Under this approach, approximately 55,000 cubic yards (cy) of contaminated soil will be excavated from across the study area and consolidated in the west mill area. Combined with the 73,000 cy already in the consolidation area (and possibly an additional 20,000 cy of contaminated sediment), this material will be covered with a two-foot permeable soil cap.

Areas where soil is removed will be backfilled with clean material and will meet unrestricted-use cleanup levels. **The excavated and re-filled areas, including the Ennis Creek Restoration Area, will not require further soil cleanup actions or ongoing soil monitoring.** [17]

Soil cleanup and material management

As part of remedy design, RAMP will prepare a Materials Management Plan (MMP) describing how soil and other materials generated during remediation will be managed. This includes handling treated timbers, concrete rubble, and other structural materials, which will be recycled, reused, or properly disposed of offsite. The MMP will establish criteria for soil that requires offsite disposal, such as soil that is visibly oily and potentially for sediment also requiring offsite disposal. **Thus, it is likely that not all contaminated material will be placed in the consolidation area.**

SL3 is a common remedy because it is protective and cost effective. Another site that capped dioxin contaminated soil is the Port Gamble Bay and Mill site. [18] Figure 3 shows an image of what the site looks like.

At this site, nearly 26,000 tons of contaminated soil were removed during interim actions. This is similar to the approach of removing 30,000 tons of contaminated soil in previous interim actions at the Port Angeles Rayonier Mill study area. The remaining areas of dioxin-contaminated soil at the Port Gamble Bay and Mill Site are capped with a 2-foot permeable soil cap.



Figure 3: Image of the Port Gamble Bay and Mill site.

[17] As noted in the IAP, other than the City Purchase Area, the foreseeable future use of the remainder of the property has not yet been determined. Therefore, at this time, the soil CULs for direct contact for that portion of the property are set at unrestricted land use CULs. If prior to implementation of soil cleanup actions, RAMP provides sufficient information to demonstrate that the future use of the property will be industrial, application of unrestricted land use CULs shall be re-evaluated.

[18] https://apps.ecology.wa.gov/cleanupsearch/site/3444

Figure 4 shows where dioxin-contaminated soil was capped in place (cross-hatched sections) and where contaminated soil was removed (blue section).



Figure 4: Map showing the approach taken to address contaminated soil at the Port Gamble Bay and Mill site. *Source: Port Gamble Bay and Mill Site Upland Draft Cleanup Action Plan including SEPA Documents*[19]

[19] https://apps.ecology.wa.gov/cleanupsearch/document/91728 (download link; 5.5MB)

Concerns about contaminants leaking or leaching

Many commenters expressed concern that the consolidated soil would "leach toxins." In accordance with WAC 173-340-747, soil concentrations for groundwater protection are derived using the fixed-parameter three-phase partitioning model.[20] This method defines unsaturated-zone and saturated-zone soil concentrations that ensure groundwater cleanup levels will not be exceeded due to leaching from contaminated soil. **Groundwater data support the conclusion that soil contamination is not leaching into groundwater above groundwater cleanup levels.**

Instead, most of the contaminants in groundwater come from ammonia and low dissolved oxygen (reducing conditions) in the groundwater. This makes the pH caustic (more alkaline, see figure 5), causing metals in the soil to dissolve into groundwater. The groundwater remedy of air sparging will help degrade the ammonia, which will cause the pH to go down to a neutral state and allow the metals to reabsorb to the soil.

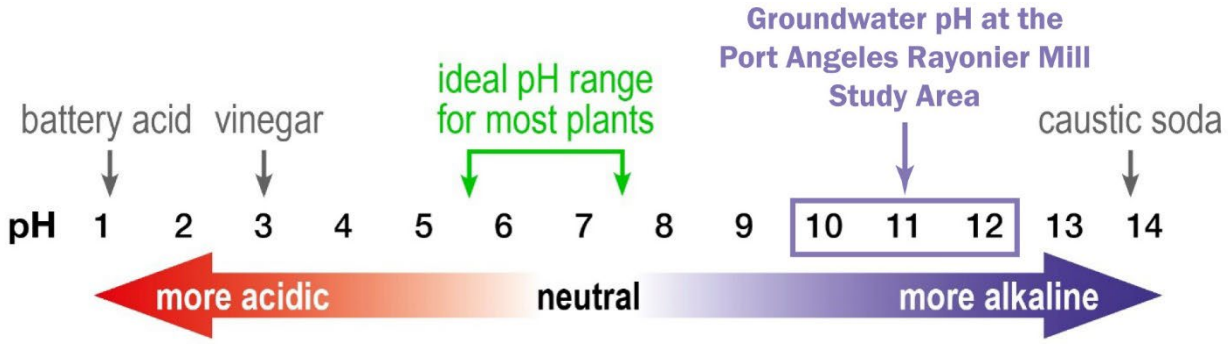


Figure 5: The pH scale. Groundwater pH in the study area is more alkaline, but air sparging will bring it back to more neutral levels. *Source: Department of Natural Resources and Environment (1999); redrawn by Science with Style. Accessed via the Soil*

Consolidating the contaminated soil will not cause a "leaching of toxins." The cap protects against direct contact between the contaminants and humans/wildlife. It does not prevent water from getting into the soil because protecting against leaching into groundwater is not needed. Consolidating the soil in the west mill area will not impact Ennis Creek.

Concerns about fencing and signage

Currently, the property is fenced and signs warn people to stay off the property because the remaining soil contamination is in the surface soil where people might come into direct

[20] https://app.leg.wa.gov/wac/default.aspx?cite=173-340-747

contact with it. Once the soil is consolidated and capped, fencing and signs are only needed to protect the cap.

In the future, if the area of the cap is redeveloped, fencing and signage will be re-evaluated. The rest of the property will not need fencing and signs to protect against contamination exposure. Rather, fencing and signs may remain at the property to protect against trespassing on private property.

3. Financial

Description

Many commenters expressed their distrust in RAMP's Disproportionate Cost Analysis (DCA), which was initially completed in the 2019 feasibility study to determine which cleanup option was permanent to the maximum extent practicable.[10]

Many commenters thought the cost of Alternative SL5 was overestimated and the cost of Alternative SL3 was underestimated, as presented by Integral at a Port Angeles City Council meeting. Some comments expressed concern that the DCA process doesn't adequately reflect all the true costs of cleanup, such as the value of fish and salmon near the site.

Commenters also expressed concerns about ongoing monitoring costs. They had questions about who would be responsible for these costs in the future. They also had concerns about Ecology's ability to enforce payment in the future.

Finally, many commenters felt that RAMP could afford Alternative SL5 and should be required to implement SL5, regardless of any cost benefit analysis.

Response

We re-evaluated DCA concerns

To address the distrust of the DCA process, Ecology re-evaluated the DCA using parameters that the Port Angeles City Council and commenters suggested. Ecology used the 2025 PMEP guidance and tool to re-evaluate the soil alternatives SL3 (consolidate and cap) and SL5 (offsite disposal).

When Ecology used the 2025 PMEP tool with the costs and benefits that RAMP used in the original feasibility study DCA, Alternative SL3 remained the PMEP alternative. Ecology then made adjustments to costs and benefits as suggested by the City of Port Angeles consultant, Integral, and Alternative SL3 continued to emerge as the PMEP alternative.[4]

Please refer to pages 10-12 or Appendix C for more information on how Ecology accounted for these concerns.

Economic losses to Port Angeles

We hear the frustrations many commenters expressed about ongoing environmental harm and the loss of economic opportunities each year the former Rayonier Mill site sits without cleanup. We also hear the concerns that contamination remaining on the property may discourage future buyers and developers. Like community members, we are eager to start cleanup construction so that groups and buyers can realize the future use of the property.

Ecology is not involved in selecting or implementing future land uses; these decisions rest with the property owner and local government. After cleanup, development can take place on the capped soil in the consolidation area, or anywhere in the study area, subject to local permits. At time of this publication, we do not know of any development plans for the property. If Ecology is notified about development plans at the time of engineering design, the cap can be designed to incorporate the planned development.

Additionally, the cap could be re-engineered in the future. At other cleanup sites where containment is the remedy, Ecology has allowed new development to occur on an existing cap as long as the new construction effectively contains the contamination. Before the development can occur, the cleanup documents would need to be amended and required public comment and review process would need to occur before approval. The East Bay Redevelopment site (CSID 407) is one example of a site where development on an existing cap has occurred. [21]

Financially accounting for fish in the DCA

Some commenters ask if there should be a financial accounting for the fish, salmonids, and habitat in the DCA evaluation. In general, it's very difficult to put a precise monetary value on environmental health benefits or the services provided by natural ecosystems. Instead, we account for these kinds of benefits by scoring them qualitatively and applying weights to those scores in the DCA.

Both Alternatives SL3 and SL5 require the full area around Ennis Creek meets unrestricted use cleanup levels. Fish and wildlife moving through Ennis Creek are equally protected under these alternatives, and the benefit scores in the DCA reflect this protection.

Recovering costs from ecological damage

Under our PMEP guidance, Ecology considers natural resources when scoring *benefits* in the cost-benefit analysis. However, requirements for ecological restoration are not part of Ecology's regulatory authority. Because of this, we cannot include any assessment of natural resource damage caused by past contamination in the DCA's *cost* evaluations.

[21] https://apps.ecology.wa.gov/cleanupsearch/site/407

Instead, cost recovery occurs through a separate process, called the Natural Resource Damage Assessment (NRDA) process. NRDA quantifies past and ongoing harm to fish and habitat resulting from the same contamination that is the subject of this cleanup. NRDA is used to determine appropriate compensation owed by PLPs for that harm. At the Rayonier Mill site, a separate NRDA process has been going on for over ten years.

Even though the two processes are distinct, the cleanup and NRDA are certainly related; one of the Agreements by which EPA deferred the management of the cleanup to Ecology provides that the cleanup cannot preclude restoration of Ennis Creek and its estuary. Section 6.1.2 of the Interim Action Plan reflects and accounts for this requirement.[22]

Future funding for ongoing monitoring concerns

MTCA requires that the PLP pays the costs of cleaning up the contaminated site throughout its entire remediation. This responsibility includes any required long-term monitoring or maintenance and Ecology's oversight of the work.

In addition, MTCA requires financial assurance mechanisms at sites where the cleanup action selected includes engineered and/or institutional controls, like a cap. A trust fund, a surety bond, or a letter of credit are examples of financial assurance mechanisms.

Our oversight of the work ensures the cleanup is completed appropriately. RAMP retains the responsibility for monitoring and maintenance and is required to provide a financial assurance mechanism to ensure the long-term effectiveness of the engineered and institutional controls.

Commenters want Ecology to disregard the disproportionate cost analysis

MTCA does not allow this. Under MTCA, Ecology must select the remedy that is permanent to the maximum extent *practicable* (PMEP). "Practicable" is a limitation on what Ecology may require in a cleanup.

There is no provision that allows Ecology to require a PLP to conduct a cleanup that is more expensive than the PMEP remedy based on a determination that the PLP can afford it. Remedy selection does not change depending on the entity that implements it. For example, if another company or local government were to purchase the property and take over the cleanup, they would be approved by Ecology to implement SL3 as well.

[22] https://apps.ecology.wa.gov/cleanupsearch/document/172258 (download link; 19.5 MB)

4. Restoration and Ennis Creek

Description

Commenters shared concerns about the cleanup's impacts on Ennis Creek and stressed the importance of the creek for a productive salmon run in Port Angeles.

Commenters requested that the creek be restored in a prompt manner. They mentioned that cleanup of this site builds on and supports regional improvements being made to the area, such as the Washington Department of Transportation's fish culverts projects.

Commenters also mentioned that the former Rayonier Mill property needs to be restored to improve the wildlife corridors in the area.

Response

We recognize the community's strong interest in restoring Ennis Creek. Much of the watershed and its fish habitat are functioning ecosystems that lie within the Olympic National Park, and the creek is the only snow-fed creek that drains into Port Angeles Harbor. Several effective habitat improvement projects have already been completed, and eventual restoration of the creek's estuary would reconnect it with the harbor and further support critical salmon habitat.

Ennis Creek

Removing contaminated soil near the creek remains a cleanup priority. The IAP requires that the cleanup must not interfere with future physical and biological restoration of Ennis Creek and its estuary. All contaminated soil will be removed from the potential Ennis Creek Restoration Area to support this goal.

Ecology, RAMP, and the Trustee Council recognize the value of coordinating cleanup and restoration when possible. Section 6.1.2 of the IAP reflects the requirements of the 1999 Preliminary Agreement between Ecology and the Lower Elwha Klallam Tribe.[10] That agreement states the cleanup must not preclude restoration of Ennis Creek and its estuary.

Our studies show that the soil and groundwater from the former Rayonier Mill study area are not contributing contamination to Ennis Creek surface water. Dioxins and metals were detected in one or more of the surface water samples collected from Ennis Creek and White Creek. All of these detections were below screening levels except for one dioxin congener named octachlorodibenzodioxin (OCDD). The lab estimates that the OCDD concentration was just above the laboratory reporting limit.

The concentrations of metals and dioxins/furans detected in the surface water samples collected downstream of the areas of the former mill (where pulp processing and support

activities took place) were similar to the concentrations we detected upstream of these areas. **This indicates that present-day surface water quality in Ennis Creek and White Creek is not impaired by the historical mill operations.**

The Natural Resource Damage Assessment (NRDA) process

Under MTCA, Ecology's role is focused on contamination cleanup rather than restoration. We will address restoration activities through the Natural Resource Damage Assessment (NRDA) process, which evaluates injuries to natural resources from hazardous substances and determines the restoration needed to compensate for those injuries.

The NRDA Trustee Council in Port Angeles consists of: Ecology, National Oceanic and Atmospheric Administration (NOAA), U.S. Fish and Wildlife, the Lower Elwha Klallam Tribe, the Jamestown S'Klallam Tribe, and the Port Gamble S'Klallam Tribe.[23] The Trustees operate under the authority of the federal Superfund law CERCLA, with Ecology also exercising its authority under MTCA.

The Trustee Council is negotiating with RAMP regarding resolution of potential natural resource damage claims. A settlement hasn't been reached yet, and the negotiations are confidential. If an agreement is reached in the future, it may include restoration work within the study area and would be a separate settlement from the MTCA cleanup settlement under the consent decree.

If you would like to learn more about how the NRDA process operates to recover damages for ecological injuries caused by contamination, Ecology has a blog post about NRDA in Port Angeles.[24] This blog was posted in 2021 when a settlement was met with the Western Harbor PLPs.

5. Cleanup logistics

Description

We received several questions about cleanup logistics. These were related to details of the timeline, cleanup technologies, scope of cleanup, and impacts of the former Rayonier Mill operations outside of the study area currently being cleaned up. We also received questions focused on cleanup plans and methods for the proposed cleanup of soil, groundwater, and sediment.

[23] https://ecology.wa.gov/spills-cleanup/contamination-cleanup/cleanup-sites/puget-sound/port-angeles-harbor/port-angeles-harbor-nrda
[24] https://ecology.wa.gov/blog/april-2021/restoring-the-environment-after-toxic-contaminatio

Response

Phasing cleanup with structure removal and potential habitat restoration

The former Rayonier Mill cleanup is a complex, multiyear project that involves coordinating soil, groundwater, and sediment remediation. RAMP's first major task is to develop a Master Plan outlining project component phases.

Ecology is also requiring the RAMP to remove creosote pilings on the dock and jetty, which continue to contaminate sediments. This work will eliminate large in-water structures and supports RAMP's lease obligations with the Washington State Department of Natural Resources (DNR). The lease requires RAMP to remove the dock and jetty and recontour the shoreline to a more natural condition.

In-water work is generally restricted to a mid-July through mid-February window to protect fish, including migrating juvenile salmon. These seasonal limitations extend the number of construction seasons required. Design, permitting, and constructing the soil, groundwater, and sediment remedies, as well as removal of in-water structures, will take seven to ten years.

Separately, RAMP and the Port Angeles Harbor Trustee Council are negotiating how to resolve natural resource damage claims through the NRDA process. A settlement may include an Ennis Creek restoration project, though an agreement has not yet been reached. Negotiations are confidential. Coordinating cleanup with potential restoration may add complexity but will offer significant efficiencies.

Soil Cleanup

Rayonier, Inc. completed several interim actions in the early 2000s, removing approximately 30,000 tons of contaminated soil from specific areas of the property. These actions addressed localized hotspots. The contaminated soil that remains is a concern for humans and wildlife if they have direct contact. The contaminated soil does not pose a threat of leaching to groundwater.

The selected remedy for soil contamination is Alternative SL3, consolidate and cap in the west mill area. Under regulatory definitions, consolidating contaminated soil within an existing area of contamination is not considered landfilling.

As part of remedy design, RAMP will prepare a Materials Management Plan (MMP) describing how soil and other materials generated during remediation will be managed. This includes handling treated timbers, concrete rubble, and other structural materials, which will be recycled, reused, or properly disposed of offsite. The MMP will establish criteria for soil that requires offsite disposal, such as soil that is visibly oily – and

potentially for sediment also requiring offsite disposal. **Thus, it is likely that not all contaminated material will be placed in the consolidation area.**

Some commenters proposed using plants to degrade, extract, or stabilize the contamination (a process called phytoremediation). Although evaluated in the 2019 feasibility study, phytoremediation is not proven effective for dioxins and was not retained as a viable technology.[10] Other commenters asked how the soil cap would be protected from burrowing animals. Design details will be developed later, but a typical approach includes installing a woven plastic geogrid beneath the cap to discourage animals from burrowing through the cap.

Groundwater cleanup

Groundwater is contaminated with ammonia, causing low dissolved oxygen and a high (basic) pH. This condition can mobilize naturally occurring metals to move from soil into groundwater. We also detected low concentrations of certain organic contaminants, such as cPAHs, though we haven't identified any distinct plume.

The selected groundwater remedy is Alternative G-1, air sparging along the shoreline to prevent discharge of contaminants to surface water at levels above cleanup standards.

Air sparging will increase subsurface oxygen, converting ammonia into nitrite and nitrate, and promote the transfer of dissolved metals from the groundwater back to the soil (where they originally came from). It will also enhance aerobic biodegradation of dissolved organic compounds such as cPAHs by microbes in the ground. The air sparging system will be installed in phases, and the approach will be adjusted as necessary for best effectiveness. Final system design—including well locations, spacing, and airflow rates—will be determined during testing and startup.

Some commenters asked if air sparging equipment is noisy. Air sparging equipment is typically quiet, but noise control measures can be added if needed.

Other commenters asked if vapors would be released and if so, controlled. Because the primary contaminants of concern are ammonia and metals rather than volatile organic compounds, little to no vapors will be released, and soil vapor extraction is not required.

Sediment Cleanup

Sediments contain elevated levels of metals, cPAHs, PCBs, dioxins, phenols, and phthalates. The highest concentrations are located in sediment near the property in the eastern log pond and beneath the mill dock. Some contaminants pose risks to the benthic community, which includes plants and animals living in and on the sediment surface.

Other contaminants may bioaccumulate in fish and shellfish consumed by humans and wildlife.

The sediment remedy has been of special concern to the Lower Elwha Klallam Tribe because of its potential to benefit aquatic habitat and fish resources in which the Tribe holds treaty rights. Since 2007, the Tribe has prohibited treaty shellfish harvest in the Harbor due to toxic contamination, but desires to resume once the contamination has been remediated. Ecology has worked closely with the Tribe on the sediment remedy, including the recently developed contingent remedy for the near- and under-dock areas.

Contaminated sediments in the intertidal and nearshore portions of the log pond, as well as along the mill dock landing, will be excavated or dredged. The specific lateral and vertical removal limits will be defined during remedial design. These areas will be backfilled to stabilize the substrate and manage residual contamination, followed by gravel placement to restore the shoreline. Excavated materials will be transported offsite for disposal or placed in the soil consolidation area. The disposal place of excavated materials will be determined during remedial design.

Sediments outside the dredge footprint will undergo enhanced monitored natural recovery (EMNR). This method involves diluting contamination by placing clean material on the sea bottom to mimic natural sediment deposition. We will establish the thickness and composition of the EMNR layer during remedial design.

A contingent remedy has been identified for the shoreline area and beneath and adjacent to the dock. Implementation will depend on the pre-remedial design data and hydrodynamic/sediment transport modeling, which, at the time this document was published, were underway under the 2024 amendment to the agreed order.[25]

The selected remedy also includes removing treated timbers and pilings because creosote-treated structures harm aquatic life and continue to leach contaminants. Their removal, along with shoreline recontouring, is also expected as part of closing the Washington State Department of Natural Resources Aquatic Lands Lease. The dock and jetty must be removed before sediment remediation begins, and sediment work must follow immediately due to potential changes in sediment movement.

Sediment sampling will occur before, during, and after remediation. Confirmational sampling will verify cleanup, and long-term monitoring will ensure sediments continue to meet cleanup levels or demonstrate progress toward compliance in EMNR areas.

[25] https://apps.ecology.wa.gov/cleanupsearch/document/142382 (download link; 224KB)

Site versus Study Area

Under MTCA, a site includes all areas where contamination has come to be located, which can extend beyond property boundaries.

Under the 2010 agreed order, Ecology and RAMP focused on a portion of the site known as the study area, an area both parties agreed was likely affected by the former Rayonier Mill. The study area includes the former mill property and adjacent marine environment. Based on current information, the study area represents only part of the full MTCA site.

Through consent decrees for the Western Port Angeles Harbor site and the former Rayonier Mill study area, we've defined sediment contamination boundaries. However, contamination from historical air emissions in upland areas beyond the property line remains undefined.

Ecology's preliminary soil sampling downwind of the mill found low levels of dioxins in surface soils that exceed cleanup levels. We need additional sampling to determine the sources and extent of off-property dioxin contamination. RAMP remains responsible for any future remedial actions that MTCA requires outside the study area.

A Cleanup Action Plan describes the proposed cleanup for an entire site. When the cleanup applies only to part of a site, we document it as an Interim Action Plan (IAP). The proposed cleanup for the study area (IAP) is the final cleanup—not a partial cleanup—of the study area. Additional cleanup may be required for areas outside of the study area, but that is not determined at this time.

The consent decree and the IAP address the study area. Any contamination in offsite areas that is found to be attributable to the former Rayonier Mill's operations will be addressed through separate actions.

Past disposals of Rayonier Mill materials in other landfills

Some commenters expressed concerns about former Rayonier Mill waste that has already been disposed of at other landfills in the Port Angeles area.

13th & M Landfill and Mt Pleasant Landfill

The Rayonier 13th & M Landfill and Mt Pleasant Landfill are closed landfills where Rayonier, Inc. disposed of woodwaste that the former Port Angeles pulp mill generated. While EPA conducted a CERCLA Preliminary Assessment/Site Investigation at the landfills in the late 1990s (in conjunction with the CERCLA listing of the former Rayonier Mill site), the landfills are not listed on the CERCLA National Priorities List. They are also not cleanup sites under Washington's cleanup law, the Model Toxics Control Act.

The landfills are in post-closure status under solid waste permits issued by Clallam County Environmental Health Services in accordance with Washington's Minimum Functional Standards for Solid Waste Handling, Chapter 173-304 of the Washington Administrative Code (WAC).[26] The post-closure maintenance and monitoring activities required by the permits include groundwater and landfill gas monitoring. These landfills are addressed under other authorities, and they are not a part of the Rayonier Mill cleanup.

City of Port Angeles Landfill

As part of the interim actions in the early 2000's, Rayonier, Inc. disposed of nearly 30,000 tons of contaminated soil at the City of Port Angeles Sanitary Landfill. The city landfill is a permitted landfill that closed in 2014. This landfill is also in post-closure maintenance and monitoring activities. Groundwater and landfill gas are monitored. Any contaminants from the former Rayonier Mill waste would be mixed with contaminants from other waste material already at the City Landfill.

Sample for per- and polyfluoroalkyl substances (PFAS)

Ecology evaluates each cleanup site individually. PFAS sampling is recommended at facilities where these compounds are known or suspected to have been used, such as airports, fire training sites, dry cleaners, and landfills.

Paper manufacturing is an industry that is suspected of using PFAS. However, the former Rayonier Mill only produced pulp and never manufactured paper from the pulp. RAMP has confirmed that PFAS were not used as part of the mill operations. Thus, Ecology has determined that the former Rayonier Mill site is unlikely to be a significant source of PFAS, and PFAS will not be added as a contaminant of concern.

6. Cleanup is taking too long

Description

Many commenters shared their frustration with the amount of time it's taken for the cleanup to get to this point. Many comments stated the cleanup restoration timeframe is unacceptable and requested Ecology speed up the cleanup process.

Response

Ecology acknowledges that the cleanup has progressed slowly, and we hear the community's desire for an expedited cleanup. Like the Port Angeles community, we are eager to start cleanup construction.

[26] https://apps.leg.wa.gov/WAc/default.aspx?cite=173-304

The process has taken time because the former Rayonier Mill site is a complex site. There are many complexities that have contributed to the pace of cleanup. Some of the complexities include:

- This site has various types of contamination in three types of media: soil, groundwater, and sediment. Each media and contaminant require more studies and different types of analysis and cleanup considerations than cleanup sites with only a few contaminants located in limited areas.
- This site has the complexity of requiring coordination with the Washington State Department of Natural Resources (DNR) lease close-out requirements. As part of closing the lease, RAMP will need to remove the large in-water structures (dock and jetty) and remove some of the fill on state-owned aquatic lands.
- This site is located in an area with potential cultural resources, which means we need to follow certain rules as we go about this work. Tribal consultation and special considerations of historic artifacts are an important part of this cleanup.
- This site has a complex regulatory approach between Ecology, RAMP, and the Western Port Angeles Harbor PLPs. This necessitated studies about the harbor because there were contaminants that RAMP needed to clean up and contaminants that originated from the western portion of the harbor that are now being addressed by those PLPs as part of the Western Port Angeles Harbor cleanup.
- There was a delay in the cleanup beginning in November 2005 when Rayonier, Inc. filed a lawsuit against Ecology over calculating cleanup levels for certain chemicals. We reached a settlement with Rayonier, Inc. in April 2006, agreeing on a new method to assess contamination. Ecology then revised the Models Toxics Control Act (MTCA) rule to clarify the process for setting cleanup levels. The revised rule went into effect in 2007.
- Restoration around Ennis Creek may occur through a separate process, called a Natural Resource Damage Assessment (NRDA). To make sure cleanup efforts do not preclude any future restoration at the site, we have incorporated information from the NRDA process to the best of our ability. NRDA determinations and settlement discussions are ongoing.
- In 2013, Ecology revised the statewide rule (Sediment Management Standards, WAC 173-204[27]) and guidance (Sediment Cleanup User's Manual[28]) for cleaning up

[27] https://apps.leg.wa.gov/wac/default.aspx?cite=173-204
[28] https://fortress.wa.gov/ecy/publications/documents/1209057.pdf

contaminated sediment. Based on the rule revisions, we needed to collect additional information to address gaps in our understanding of the sediment contamination near the former mill. We needed this information to determine appropriate background levels of contamination in the sediment to enable us to set the cleanup standards for sediment in the IAP.

While there are many special considerations, we understand this cleanup has taken a significant amount of time. We recognize those in the community who were present while the mill was operating and who hope to see this cleanup concluded. We also acknowledge the call to expedite this cleanup as much as possible, and we are committed to providing the best-quality cleanup as quickly as we can.

Regarding the cleanup schedule, we understand that some community members feel that a seven-to-ten-year timeline is too long. Once cleanup begins, the work should move as efficiently as possible. The projected timeline includes the time we need to complete final engineering plans and obtain construction permits.

At the same time, we know there is a strong desire to protect fish and other sensitive species. Once construction begins, we need to coordinate sediment cleanup with dock removal and pause the work during periods when fish migrate, so that we don't disturb or harm their populations. All in-water work must be coordinated with tides and the "work window." In-water work is not permitted during the early spring to early summer to protect fish, such as migrating juvenile salmon. Limitations set by the work window increase the number of construction seasons it takes to complete in-water work. To ensure a well-planned cleanup that protects the environment, we cannot shorten the anticipated seven-to-ten-year timeline once cleanup construction begins.

7. Accountability for RAMP

Description

Many commenters requested RAMP be held accountable. These requests for accountability included requirements for complete removal of contamination and additional efforts for restoration. Many commenters also felt that given RAMP's status as an international corporation, they should be required to spend more money on cleanup.

Several commenters shared their grievances with Rayonier, Inc./RAMP and the negative impact of its departure from the community, with years of having a large vacant property in their midst. These circumstances had unfortunate effects on the community, including loss of economic opportunities and advancement.

Response

Ecology is holding RAMP accountable for the cleanup under the state's Model Toxics Control Act (MTCA), which gives us the authority to ensure the company completes the cleanup needed to protect human health and the environment.

MTCA has provisions for financial assurance. At a site using an engineered containment system (like a cap) or institutional controls, Ecology may require the PLP to post a bond or other financial instrument that guarantees the maintenance of the containment system. The amount of the guarantee is enough to cover the costs of the operation and maintenance of the cleanup action, including institutional controls, compliance monitoring, and corrective measures as long as contamination remains at the site. Ecology will require RAMP to provide financial assurance for this cleanup.

Under MTCA, Ecology selects the remedy that is permanent to the maximum extent practicable (PMEP). **There is no provision to require a PLP that might be able to pay more to conduct a more extensive cleanup.**

8. Future use of the site

Description

Commenters shared a variety of hopes for future use of the site. Some ideas that were suggested include: housing/commercial redevelopment, economic development, habitat restoration for fish and other wildlife, and a cultural center.

Commenters stressed the value of the property where the former Rayonier Mill study area is located. They requested that cleanup support any possible types of land use in the future.

Response

We recognize that many in the Port Angeles community are eager to see the former mill property put to new use.

The selected soil cleanup remedy, Alternative SL3, addresses all the contamination above unrestricted use cleanup levels. **These are the most protective standards and support any future use of the property, including residential or recreational uses.**[29]

[29] As noted in the IAP, other than the City Purchase Area, the foreseeable future use of the remainder of the property has not yet been determined. Therefore, at this time, the soil CULs for direct contact for that portion of the property are set at unrestricted land use CULs. If, prior to implementation of soil cleanup actions, RAMP provides sufficient information to demonstrate that the future use of the property will be industrial, application of unrestricted land use CULs shall be re-evaluated.

Concerns that capping will prevent future development

Capping will not preclude redevelopment. Future redevelopment, consistent with local zoning, can proceed with engineering designs that account for capping the contaminated soil. For example, a mixed-use development with office buildings and parking lot can be designed to function as a cap on the contaminated soil.

Under MTCA, cleanup levels are based on current and projected land uses as well as local zoning. Cleanup decisions do not determine or direct future land use. Most of the upland area is privately owned by RAMP, and public access is not permitted without the owner's consent. Ecology is not involved in selecting or implementing future land uses; these decisions rest with the property owner and local government.

Cleanup Alternative SL3 will meet unrestricted use cleanup levels, which are the most protective and are based on a maximum exposure scenario of residential use, including a child-exposure scenarios. When these unrestricted soil cleanup levels are met at the point of compliance, no restrictions are needed on future land use.

Examples of similar cleanups and their community outcomes

There are several cleanup sites in Washington that have used consolidation and capping to redevelop sites for a variety of uses. Some examples include:

- **The former Asarco facility[30] in Tacoma.** Cleanup at the Asarco Superfund Site in Tacoma, now known as Point Ruston, is an example of development on top of contaminated soil where the development structures function as the cap. The development includes residential units, shops, restaurants, and offices, which are designed to prevent contact with the contaminated soil. One area of the Superfund site was also redeveloped into a new public park, the Dune Peninsula at Point Defiance Park. [31] This location includes walking paths, a public amphitheater, and allows visitors to enjoy the stunning local views.

[30] https://ecology.wa.gov/spills-cleanup/contamination-cleanup/cleanup-sites/tacoma-smelter
[31] https://ecology.wa.gov/blog/july-2019/new-tacoma-park-emerges-from-superfund-site



Figure 6: Tacoma's Dune Peninsula at Point Defiance Park. Infrastructure is constructed over capped contamination, making this former community blight now an area of community revitalization and enjoyment. *Image courtesy Metro Parks Tacoma.*

- **The RG Haley International[32] and Cornwall Avenue Landfill[33] cleanup sites in Bellingham.** At this location, the potentially liable parties (the City of Bellingham and the Port of Bellingham) are in process of consolidating and capping upland contaminants. The sites are currently undergoing cleanup construction and will be redeveloped into a new public park. These sites are currently owned by the City of Bellingham and the Port of Bellingham. The city and port are responsible for and paying for the cleanup of these properties.

- **The East Bay Redevelopment[34] cleanup site in Olympia.** This site shows how a once-vacant, contaminated property can be transformed into a community asset. Similar to the Rayonier Mill site, historic timber-industry activities left behind soil and groundwater contamination. These contaminants included petroleum

[32] https://apps.ecology.wa.gov/cleanupsearch/site/3928
[33] https://apps.ecology.wa.gov/cleanupsearch/site/220
[34] https://apps.ecology.wa.gov/cleanupsearch/site/407

hydrocarbons, cPAHs, dioxins and furans, and metals. The Port of Olympia, the City of Olympia, and LOTT Clean Water Alliance are the potentially liable parties. Cleanup efforts included removing contaminated soil hotspots and covering remaining contamination with clean soil, pavement, or buildings. Today, the site is home to the Hands On Children's Museum, a popular regional destination that provides significant value to the community.[35]

We hope these examples illustrate some ways that "consolidation and cap" cleanups have successfully achieved positive outcomes similar to the community goals we heard during this comment period.

While it would certainly be possible to fine-tune the cleanup plan to coordinate with a particular planned property use, to date no realistic or reliable future use has been presented to Ecology. In 2008-10, HarborWorks Public Development Authority considered various future use options as part of its due diligence investigation of redevelopment; it concluded that a cap would be part of any likely cleanup scenario and considered an array of redevelopment options that would be compatible with a cap.

Impacts of climate change on future development

Many commenters expressed concerns about sea level rise and potential damage from major earthquakes. Ecology is also concerned about these environmental risks, and our regulations provide ways to account for them. The engineering design will evaluate the risks from sea level rise and earthquakes. A key focus of the engineering design will be to develop a cap that protects the site from these forces in perpetuity.

We will also encourage future developer(s) to consider these risks during site planning. A potential benefit to consolidating and capping contaminated soil in the west mill area means that future development on the capped area may be better equipped to deal with climate change. The capped contaminated soil will act as fill in the west mill area, raising the land so any new buildings as part of redevelopment will be built higher, better prepared for sea level rise.

Future use of Olympic Discovery Trail

Some commenters were concerned about impacts to the Olympic Discovery Trail during cleanup. It's possible that the Discovery Trail near the former mill will be temporarily closed or rerouted, as needed based on public safety considerations.

[35] https://www.hocm.org/about-us/#pattern3_3

Users of the Olympic Discovery Trail are not at risk of exposure to contamination when passing by the study area. Currently, portions of the site are fenced due to direct-exposure risks to contamination and because it is private property.

9. Damages to Port Angeles

Description

Many commenters shared their opinions about negative impacts of the mill and its closure. This includes:

- frustrations about the economic impacts of the mill's closure,
- the negative impacts that occurred during the mill's operation, such as a foul smell to the air, poor air quality, and lasting stigma, and
- observed health impacts to themselves or neighbors that they attribute to mill operations.

Commenters also wondered if Port Angeles is being treated unfairly with this cleanup. Commenters shared:

- suggestions that the cleanup may have occurred more quickly if the site was in a big city, like Seattle,
- feelings of being overlooked due to the remote location of Port Angeles and its rural setting, and
- thoughts about if the site should have been a Superfund site, and if the cleanup would have been addressed more quickly if it was under federal oversight.

Overall, many commenters believe that Port Angeles deserves a better cleanup than what has been proposed.

Response

Ecology understands this site has been a long-standing concern and point of frustration for the Port Angeles community. Our goal is to clean up the study area so that it may be put to new uses in the future.

We understand there are many hopes for the future of this property. While our authority is limited to the MTCA cleanup process and not future land-use, we are committed to doing everything we can within the MTCA framework to support site re-use.

Ecology's work to address contamination across Port Angeles

Ecology identified Port Angeles Harbor as a priority embayment under the Puget Sound Initiative.[36] We share updates about the progress of these sites on Ecology's Cleanup in Port Angeles Harbor website[37] and in our 2025 status update on Port Angeles cleanups.[38]

In addition to the former Rayonier Mill cleanup, we are focused on moving several other Port Angeles cleanup projects forward. These include sites such as the large Western Port Angeles Harbor Sediment site (CSID 11907),[39] and smaller sites like:

- Port Angeles Port of Marine Trades Area (CSID 1301),[40]
- Terminals 5 6 & 7 Uplands (CSID 15440),[41]
- Former Shell Oil Bulk Plant (CSID 13147),[42] and
- Pettit Oil Company Tumwater Truck Route (CSID 13146).[43]

We are committed to moving this site and other Port Angeles cleanup sites forward as quickly as we can. Cleanup of all these sites will address the contamination in Port Angeles and lead to a cleaner community.

Ecology's focus on the Rayonier Mill site

The former Rayonier Mill site is a priority for Ecology's Toxics Cleanup Program. It has been discussed at the highest levels of our leadership, including with Ecology's Director.

We are committed to staying connected with the community and sharing updates, especially during key public involvement opportunities. In 2025, we hosted two in-person events to update the public on the Rayonier Mill and Western Port Angeles Harbor cleanup efforts. We also posted videos of the event presentations on Ecology's YouTube channel so community members can access the information anytime.

Over the past two years, we've also taken part in StreamFest, a local community event where we share annual updates on Port Angeles cleanup sites, including the former Rayonier Mill. By continuing to show up and share information, we hope to demonstrate our strong commitment to the Port Angeles community.

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[36] https://ecology.wa.gov/spills-cleanup/contamination-cleanup/cleanup-sites/puget-sound
[37] https://ecology.wa.gov/spills-cleanup/contamination-cleanup/cleanup-sites/puget-sound/port-angeles-harbor
[38] https://apps.ecology.wa.gov/publications/SummaryPages/2509132.html
[39] https://apps.ecology.wa.gov/cleanupsearch/site/11907
[40] https://apps.ecology.wa.gov/cleanupsearch/site/1301
[41] https://apps.ecology.wa.gov/cleanupsearch/site/15440
[42] https://apps.ecology.wa.gov/cleanupsearch/site/13147
[43] https://apps.ecology.wa.gov/cleanupsearch/site/13146

For the past three years, Ecology has also met regularly with City of Port Angeles representatives and local environmental groups to discuss the status of the cleanup and to hear their concerns and interests.

If you have ideas on how we can improve our community engagement, please let us know. You can reach out to Abby Zabrodsky, public involvement coordination, at Abby.Zabrodsky@ecy.wa.gov if you'd like to share your thoughts or suggestions.

Addressing the Superfund questions

It should be noted that, at the time the Rayonier mill closed in 1997, EPA was prepared to list the site on its National Priority List as a Superfund site under the federal CERCLA law and to take the lead on the cleanup. Various representatives of the State of Washington, including Ecology and the City of Port Angeles, requested EPA to "defer" NPL listing, and the result was the 1999-2000 Deferral Agreement by EPA, Ecology, and the Lower Elwha Klallam Tribe, which set forth the terms and conditions of EPA's deferral and allowed Ecology to manage the cleanup under MTCA. EPA required certain conditions, including a unique role for the Lower Elwha Klallam Tribe, due to EPA's obligations under federal law to protect the Tribe's rights and interests in cultural resources and ancestral burials, as well as its treaty rights in the natural resources contaminated by Rayonier and other PLPs. Since the execution of that Agreement and continuing to the present, the Lower Elwha Klallam Tribe has been actively involved in the cleanup process and has had significant influence every step of the way.

10. Intergenerational and environmental justice

Description

Many commenters raised concerns that the proposed cleanup would leave lasting impacts for future generations, emphasizing that Ecology has a responsibility to remove all contamination to ensure justice for the Port Angeles community.

Commenters were curious about how Ecology considered environmental justice when selecting the cleanup remedies.

Response

Ecology's mission is to protect, preserve, and enhance Washington's environment for current and future generations. While capped contamination will remain at the site, **the contaminated materials will be capped in a way that prevents them from harming human health, the environment, and future generations.**

We anticipate the study area's cleanup will achieve the state's most protective soil cleanup standards (called unrestricted use cleanup levels). In the future, the study area

can be redeveloped based on City of Port Angeles land use zoning/permitting and the property owner's goals. We believe this cleanup will result in a safer, cleaner environment for future generations living in, or visiting, Port Angeles.

Environmental justice is an important part of our work. During the cleanup, we conducted two separate environmental justice assessments. We conducted the first assessment while developing the draft Interim Action Plan. This assessment identified vulnerabilities in the population and asked if the cleanup would exacerbate these vulnerabilities. You can find information about this assessment in Section 6.5 of the Interim Action Plan.[22]

We conducted the second assessment before the public comment period. This assessment identified potential barriers to the public outreach process and language accessibility needs. In this assessment, we determined we didn't need to translate materials and that we should prioritize in-person engagement opportunities.

Throughout the cleanup process, we have strived to provide meaningful community engagement through in-person public meetings and open houses, distributing mailers, updates, sending updated documents to the Port Angeles library (which maintains an in-person collection of Port Angeles cleanup documentation), and participating at StreamFest in 2024 and 2025.

We will continue to provide updates and transparency to the community about the cleanup as work progresses.

11. Climate and natural disasters risks

Description

Commenters had concerns about the proposed cleanup and its resilience to climate change and natural disaster risks. Specifically, commenters wondered how Ecology considered the risk of tsunamis, earthquakes, and sea level rise.

Commenters also requested more information about how Ecology considers climate change in our cleanups. They stressed that Ecology needs to take these concerns seriously.

Response

Ecology appreciates the public's concerns regarding the long-term impacts of extreme natural hazards on the former Rayonier Mill site. Under MTCA, a proposed remedy must

explicitly "provide resilience to climate change impacts that have a high likelihood of occurring and severely compromising its long-term effectiveness."[44]

While we recognize that no engineered structure is entirely immune to all future uncertainties or unprecedented disasters, the PLP is legally bound to high engineering standards with respect to permanence and resilience. As agreed upon in the second amendment to the agreed order (dated June 3, 2024), RAMP is currently following a multi-step framework to evaluate these complex hazards and adapt the remedy accordingly.[25] Once the consent decree has been approved by the Superior Court, the unfinished elements undertaken as part of the amended agreed order will be rolled into the cleanup plan and completed. A summary of the framework steps is as follows:

- **Document Physical Forces (Metocean conditions) and Historical Changes:** The first major step is to map out the physical forces acting on the site—such as typical and extreme winds, waves, currents, tsunami hazards, flows from Ennis Creek, projected sea-level rise, and climate change. This is combined with a thorough review of historical records and surveys to understand the site's coastal geomorphology, such as how the shoreline has physically changed over time, where sediment moves and is deposited, and where erosion typically occurs.
- **Develop a Conceptual Site Model (CSM):** With knowledge of the physical forces at work at the shoreline, the complex shore zone is divided into smaller, manageable subareas that share similar physical and environmental conditions. This allows the team (RAMP, Ecology, and the Tribe) to build a baseline model documenting exactly how the shore zone functions today and the specific challenges each subarea currently faces.
- **Apply the CSM and Select a Remedy:** Next, RAMP will use the CSM to predict how the site will respond to alterations and to guide numerical (computer) hydrodynamic modeling aimed at better understanding the site and its response to changes. This will include modeling of both Ennis Creek and the coastal environment. This step provides an assessment of how remedy and shoreline modifications will alter the way waves and sediment interact with the shore and vicinity. This step will involve iterative modeling before identifying a preferred remedy.

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

- **Address Vulnerabilities and Develop Backup Plans:** Finally, based on the results of the prior step, the team pinpoints specific areas of concern that require backup plans (contingencies) to address any risks or vulnerabilities.

We acknowledge the community's concerns that rising ocean levels, shifting storm patterns, and more extreme weather could impact the cleanup remedy over the next century. Rather than relying solely on historic data, RAMP will consider future sea-level rise projections and climate change as an integral part of the multi-step framework, utilizing the best available science.

Similarly, we recognize the severe threat posed by a Cascadia Subduction Zone (CSZ) earthquake and the potential for a subsequent tsunami to cause catastrophic scouring in the harbor. RAMP is required to consider both seismic and tsunami hazards as a part of the multi-step framework and they bear the long-term liability for material that is designed to remain on site.

12. Public involvement and distrust

Description

Commenters voiced frustration that Ecology didn't propose Alternative SL5 as the final cleanup remedy even though the community has voiced their strong preference for this remedy. Commenters cited feedback they provided in past comment periods for the site, specifically the 2019 comment period for the RI/FS report. They wondered if their comments had any impact on the cleanup, and what was the purpose of the comment period.

Response

We appreciate the community's comments, time, and energy with this cleanup. We have used community feedback to shape this cleanup. Based on this feedback, we have been able to shape the cleanup to meet the community's core concerns: having the former Rayonier Mill site be safe for humans and the environment, as well as keeping the potential for a variety of future uses.

Public involvement is an essential element of our work. Your feedback and comments provide Ecology with additional information, perspectives, and feedback that we use to inform this cleanup work moving forward. For example, the weighting that Ecology assigns to the benefit elements of the DCA is informed by public comment. In this case, knowing the community's desire for a long-term, permanent solution, Ecology assigned the maximum weight to the benefit category "Permanence." But MTCA does not allow Ecology

to select an alternative, such as SL5, simply because it is the one favored in a majority of public comments.

How public comment has shaped this cleanup

As a result of the recent public comment period, we re-evaluated cleanup options and explored new ideas on how we potentially could achieve an outcome that is legally enforceable and more in-line with community members' feedback and desires. We performed a reanalysis of the DCA and explored in detail ideas and suggestions submitted to us in public comments (including the potential for moving contaminated material to the City of Port Angeles landfill). However, we were unable to identify a legally enforceable cleanup that is beyond the consolidation and cap cleanup we will use.

Even though public feedback didn't result in a change in the decision in this instance, the feedback that we received was helpful in reinforcing our understanding of community values and priorities. We will keep these concerns and priorities in mind while working on the engineering design for this site. We are also committed to keeping the community engaged in the cleanup moving forward. At a minimum, we will update the community via updates to our Port Angeles Rayonier Mill webpages, emails to our Cleanups in Port Angeles listserv, and mailed updates to those in the vicinity of the Port Angeles Rayonier Mill cleanup.

During the 2019 RI/FS comment period, community members raised concerns about soil cleanup options that relied on remediation levels to define active areas of soil removal. The proposed remediation levels were set to protect for occasional visitors to the property. These levels are less protective than the unrestricted use cleanup levels that have been set in the IAP. These alternatives would have resulted in less soil being removed, and large areas relying on institutional controls such as fencing and signs.

Public concerns aligned with Ecology's regulatory authority under MTCA, which requires that remedies should not rely primarily on institutional controls. After the 2019 public comment period, Ecology removed these options from further consideration.

Community priorities we keep front and center

During the 2025 comment period, we heard that the community has concerns about Ennis Creek. We are prioritizing the creek by removing all contaminated materials along it that are within the study area. We also hear a strong preference for cleaning up the areas around Ennis Creek sooner rather than later, which might allow any restoration work to occur more quickly. Ecology will keep this request in mind as the engineering design takes place. As feasible, we will work as quickly as possible to clean up areas around Ennis Creek.

We also hear the community's concerns regarding the Olympic Discovery Trail and a strong desire to keep the trail open for bikers and other recreators. We understand that the Olympic Discovery Trail is an important corridor for bike commuters. It's possible that the Discovery Trail near the former mill will be temporarily closed or rerouted, as needed, based on public safety considerations. We will work to ensure any closures are communicated in a timely manner.

We know the community has concerns regarding the in-water structures at the site, including the dock and jetty. We agree with these concerns and are requiring the removal of the treated creosote pilings as they are an ongoing source of contamination. To remove the pilings, as required, RAMP will also need to take out the dock.

Public involvement moving forward

Typically, public comment periods do not take place during the "design the cleanup" and "cleanup the site" steps (Figure 1). Ecology will share updates on the reports and cleanup progress with the community. The public is always welcome to share their thoughts, concerns, and priorities with Ecology throughout the cleanup design. The most up-to-date contact information can be found on Ecology's Port Angeles Rayonier Mill webpage.[6]

13. Cultural resources and Tribal matters

Description

Commenters requested that Ecology remember the Tribal legacy at the site because there was a concern about potential cultural resources located at the site. Commenters were also concerned that the cleanup could affect Tribal treaty rights, specifically with restoring traditional fisheries. Additionally, there were concerns about whether the cleanup honors Tribal rights. Some commenters also had questions about Tribal engagement and involvement in the cleanup process.

Response

Ecology acknowledges the public's concerns regarding cultural resources and Tribal rights at the site. Ecology has worked closely with the Lower Elwha Klallam Tribe throughout the course of this cleanup. Our commitment to consult with the Tribe and seek the Tribe's concurrence at major points in the cleanup are formally documented in the 1999 Preliminary Agreement Between the Lower Elwha Klallam Tribe and State of Washington Department of Ecology.[45] The 2000 Deferral Agreement by Ecology, the Tribe, and EPA further incorporates this Preliminary Agreement as a condition of EPA's deferral of NPL

[45] https://apps.ecology.wa.gov/cleanupsearch/document/111411

listing. The Tribe and Ecology have worked together throughout this cleanup process, and the Tribe's participation has contributed significantly to Ecology decisions. We expect that will continue to be the case, as there will be future decisions requiring the Tribe's concurrence.

Throughout the cleanup, Ecology has met at regular intervals with representatives of the Lower Elwha Klallam Tribe to discuss cleanup and restoration plans at the site. We also share information with all Tribes in the area (including the Port Gamble S'Klallam Tribe, Jamestown S'Klallam Tribe, and Suquamish Tribe).

The cleanup will not limit Tribal access to the shoreline. The cleanup is consistent with the exercise of Tribal Treaty Rights and we developed it in consultation with the Lower Elwha Klallam Tribe.

Ecology has conducted cultural resources reviews for activities at the site that were reviewed by Washington State Department of Archaeology and Historic Preservation (DAHP) and by Tribes. The purposes of a cultural resource review include:

- Identifying any cultural resources that could be affected by the proposed remedial action.
- Assessing the effects of the remedial action.
- Seeking ways to avoid, minimize, or mitigate any adverse effects on historic properties, cultural resources, and burials or ancestral remains.

As a result of the 1999 Preliminary Agreement and the cultural resources review, a professional archaeologist (approved by the Lower Elwha Klallam Tribe) monitors all disturbances of native soils. Their archaeologist has legal "stop work" authority pending suitable treatment of cultural resources. Disposition of cultural resources affected by investigation, cleanup, or related activities require concurrence by the Tribe.

In addition to an archaeologist being present during all ground-disturbing work, an Inadvertent Discovery Plan (IDP) will be available and used onsite at all times.[46] This plan describes what to do if archeological materials or human remains are unintentionally discovered during project work.

Most recently, the Tribes and DAHP approved an Archaeological Monitoring and Inadvertent Discovery Plan for sediment sampling by RAMP's contractor that will take place in the summer of 2026.[47]

[46] https://apps.ecology.wa.gov/publications/SummaryPages/ECY070560.html
[47] https://apps.ecology.wa.gov/cleanupsearch/document/172262 (download link; 6.2 MB)

Appendix A:
Summary of Outreach

Ecology's public involvement activities related to this comment period (June 12 – August 12, 2025) included:

Fact Sheet Mailers

- **Mailed Notices:** Ecology mailed a printed multi-page fact sheet to 2,326 nearby addresses and interested parties, including homes and businesses.
- **Email Updates:** Ecology emailed updates to SEPA review agencies, local interest groups, and those subscribed to Ecology's Port Angeles Cleanups email notification group.
- **Online Access:** The fact sheet was also posted on Ecology's Port Angeles Rayonier Mill webpage.[6]

Legal Notice

- Publication of legal ad in Peninsula Daily News, dated June 12th, 2025.

Site Register

- Ecology published seven notices in its Contaminated Site Register.[48]
    - Comment Period Notices:
        - Contaminated Site Register for – June 12, 2025
        - Contaminated Site Register for – June 26, 2025
        - Contaminated Site Register for – July 10, 2025
        - Contaminated Site Register for – July 24, 2025
        - Contaminated Site Register for – August 7, 2025
    - Response Summary Notice:
        - Contaminated Site Register for – June 25, 2026

Media Notification

- Ecology sent media notice about this comment period to the:
    - Peninsula Daily News,
    - Sequim Gazette,
    - KONP/KIKN,
    - Kitsap Daily News,
    - Kitsap Sun, and the
    - Seattle Times.

[48] https://apps.ecology.wa.gov/publications/UIPages/PublicationList.aspx?IndexTypeName=Topic&NameValue=Site+Register&DocumentTypeName=Newsletter

Media Coverage

- The Peninsula Daily News published an article titled "Public comment period opens for cleanup at former Rayonier Mill site" on June 12, 2025.
- The Peninsula Daily News published an article titled "Rayonier Mill cleanup update given at community meeting" on July 11, 2025.

Social Media

- On June 10th, 2025, Ecology's Southwest Regional Office posted a story on Ecology's blog titled "Rayonier Mill cleanup is moving forward."[49]

Public Meeting and Open House

- Ecology hosted an in-person meeting and open house at the Port Angeles Field Arts & Events Hall in downtown Port Angeles. This event took place on Tuesday, July 8th, 2025, from 5:00 to 8:00 p.m.
- One hundred and six individuals signed in at the event.
- Ecology staff presented details on the consent decree, Interim Action Plan, and SEPA documents. Ecology staff also answered questions about the study area.



Figure 7: Ecology staff presenting during the July 8th public meeting.

[49] https://ecology.wa.gov/blog/june-2025/rayonier-mill-cleanup-is-moving-forward

Presentation Recording

- Ecology staff created a recorded video recording of the presentation given during the public meeting and open house. The recording is available on Ecology's YouTube channel.[50]
- Ecology emailed notification of the recording link and presentation slides to 699 people, including interested individuals, local/county/state/federal agencies, neighborhood associations, and interested community groups.

Websites

- Ecology updated its Port Angeles Rayonier Mill website.[6] 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.[51]

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.
  - **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 Port Angeles Rayonier Mill webpage.[6]

[50] https://www.youtube.com/watch?v=GkQrn9GW7O8
[51] https://ecology.wa.gov/events/search/listing

Appendix B:

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Comments

Acosta, Scoli

Date: 8/11/25
Method: Website
Comment: See below.

Subject: Please Choose Alternative SL5 for a Permanent Cleanup of the Rayonier Mill Site

Marian Abbett, Site Manager Washington Department of Ecology PO Box 47775 Olympia, WA 98504-7775

I am writing as a concerned citizen and a member of the Port Angeles community to express my strong support for Alternative SL5 for the cleanup of the former Rayonier mill site. This is a critical issue for the long-term health of our community and the unique marine habitat of our waterfront.

The Port Angeles waterfront is a vital resource and a home to critical species, including our endangered Southern Resident killer whales, salmon, and migratory birds. The contamination at the mill site, including PCBs, dioxin, and heavy metals, poses a significant and ongoing threat to this sensitive ecosystem.

Alternative SL3, which involves simply capping the site, is not a permanent solution. This temporary fix ignores the very real risks of sea-level rise, coastal erosion, earthquakes, and floods that could breach the cap and re-release pollutants into our waters.

A complete and permanent cleanup is long overdue. I urge you to select Alternative SL5, which involves the full removal of all contaminated soil. This is the only lasting solution that will truly protect our community and our environment for generations to come.

I believe the benefits of SL5 are vastly understated, and the costs of SL3 are not accurately estimated. The long-term health of our community is a benefit that cannot be measured in simple terms.

The health of the Port Angeles waterfront and surrounding waters of Port Angeles is the health of the Strait of Juan de Fuca, the Pacific Ocean, and all the waters of the world. Not holding Rayonier responsible for the mess they've left behind is not being responsible to our friends, aquatic and not, of the world. Respect us, respect them, respect our world and make sure they clean up this mess.

Please, for the sake of our community and our environment, choose Alternative SL5.

Sincerely,
Scoli Acosta

Ahlburg, Kaj

Date: 8/12/25
Method: Website
Comment: See below.

1. The proposed timeline for the remaining cleanup is unacceptably long. The Scott Paper Mill cleanup in Anacortes – same industry, similar contaminants - took about five years from beginning to end. In 2000, an Ecology official said the clean-up would take another four to six years. 25 years later Ecology is giving an estimate of up to an additional 10 years.

With all the studies and preparatory work already done, there is no technical reason the cleanup could not be completed in well under five years. Rayonier so far has fulfilled all of its legal responsibilities with respect to the clean-up, and the Action Plan should not be punitive towards Rayonier. However, Rayonier received an excellent financial deal from Ecology's forbearance, being able to postpone the bulk of the cleanup cost by already 28 years.

Rayonier should be informed now that the cleanup must proceed on an expedited schedule, or else Ecology will declare them noncompliant and conduct the cleanup itself using funds from the Hazardous Substance Tax, pursuing recovery of the costs from Rayonier. The citizens of Port Angeles deserve no further delay in restoring this important part of their waterfront.

2. The upland cleanup timetable should not be tied to the marine cleanup if the latter takes longer, so that the land portion of the cleanup area can be sold by Rayonier and placed back into productive use as soon as possible.

3. The Natural Resource Damage Assessment (NRDA) process should not delay the cleanup, nor prevent Rayonier from being incentivized to eventually make the property available for productive use again. Any Ennis Creek related restoration projects should not delay the conclusion of the upland area cleanup.

4. Rayonier should not be incentivized to never sell the property by being offered NRDA credits with a value in excess of the property's market value once cleaned up, for ceding the property for a nature or cultural preserve. Ecology cannot force Rayonier to sell the cleaned-up property, but it can make certain that eventually selling it is in Rayonier's economic interest.

5. Ecology should choose the SL5 option for the cleanup. Capping 10 acres of the site, fencing it off, and monitoring it for decades, as SL3 would require, would make any sale of the property and future development extremely difficult, if not impossible, particularly if Ecology needs to approve any construction on that site.

As a former board member of the Port Angeles Harbor Works Public Development Authority, I want to dispel the narrative that Harbor-Works failed because it was concluded that the Rayonier property would never have any commercially valuable use once cleaned up. This was not the case. The Rayonier property could be an important engine for the economy of the City of Port Angeles, with a tribal cultural center, such as proposed by the Jamestown S'Klallam Tribe, an Anthony's Restaurant, a marina, light marine industry, or many other alternative potential uses.

Harbor-Works failed because with the glacially slow pace of the cleanup and Ecology's inability or unwillingness to place pressure on Rayonier for a prompt cleanup, Rayonier had no incentive to make a deal involving a quick cleanup. A dollar spent today is worth much more than a dollar spent 20 years from now. 16 years later, things have worked out exactly as Rayonier had hoped when Harbor-Works failed – it has not yet had to pay the tens of millions of dollars for the cleanup and under the current schedule would not have to do so for many years.

There is room on the Rayonier site both for conservation, such as restoration of Ennis Creek, public access and recreation, and productive use resulting in the jobs, housing, and tax revenues so needed by our community.

Akmal, Babra

Date: 8/9/25
Method: Website
Comment: See below.

To Whom It May Concern:

I am writing to advocate for a Level 5 cleanup of the former Rayonier Mill site in Port Angeles, WA, which is the best option to ensure a total cleanup of all contaminants in this area.

Thank you.

Almanza, Juanita

Date: 7/24/25
Method: Website
Comment: See below.

Calling for Option 5! No other option is good enough for our communities future.

Andermo, Nils

Date: 8/09/25
Method: Website
Comment: See below.

While I believe that several of the benefit scores are much too high for SL3 and too low for SL5, my comments will focus on what I see as completely missing benefit criteria, and the related costs.

Usability of land:

Where is the benefit criteria for the usability of the land? This is prime waterfront location in Port Angeles along the popular Olympic Discovery Trail. In addition, there is already a road leading down to the property from above the bluff.

SL3 would result in a 10-acre fenced off, permanently polluted, keep-out area whereas SL5 would allow for redevelopment of the whole property in accordance with the Comprehensive Plan.

The missed economic value of fencing off 10 acres needs to be estimated and included as a cost for the SL3 plan. At the very least, Rayonier should be required to lease the fenced off property from the City of Port Angeles at fair market value, for the entire time that it cannot be used for other purposes.

Long-term monitoring and maintenance:

The criteria “Technical and administrative implementability” is scored 9 and 6 for SL3 and SL5 respectively. This seems flipped as containing the pollutants surely must be more technical and require more administration than digging it up and hauling it away. With a score of 9 for SL3, it absolutely cannot include long-term monitoring and maintenance.

And why is the cost of monitoring and maintenance in SL3 limited to 30 years?

Anderson, Jesse

Date: 8/10/25
Method: Email
Comment: See below.

Hello, I would like to write to you in support of a permanent solution for contaminated soil and sediment at the former Rayonier Mill site in Port Angeles, WA. Proposed Alternative SL-3, leaving contaminated soil in place forever in a capped mound would greatly limit future development, and is unacceptable. It would leave a 10-acre, seven-foot-tall mound of capped toxic soil and sediment, surrounded by a fence, in perpetuity. The soil contains dioxins, PCBs, metals, diesel, and oil. This would greatly limit any future development in the area, and would conflict with the City's Comprehensive Plan for mixed-used development in the area. I would very much appreciate any efforts towards a full and permanent cleanup solution, including removing the contaminated soil. Thank you.

Sincerely,

Jesse Anderson
Port Angeles, WA

Antrim, Liam

Date: 7/31/25
Method: Website
Comment: See below.

Given the land alterations adjacent to Ennis Creek at the Rayonier site in Port Angeles, I encourage Ecology to include stream and estuary restoration as a requirement of site remediation. This is essential for the viability of fish populations of Ennis Creek.

Unless there is a planned owner and use for the pier, removal of the pier and hundreds of creosote pilings would be a good mitigation for other shoreline impacts that can not be mitigated.

Moreover, removal of contaminated soils seems the best option for site restoration and creation of a location where future development is not limited by past transgressions. I support the City of Port Angeles and many others who have recommended this action.

Arthur, Bill

Date: 7/27/25
Method: Website
Comment: See below.

I support the selecting SL5 as the solution needed to clean up the still substantial contamination that is on the former Rayonier mill site. The creosote pilings and other contaminated onsite material should be fully removed and disposed at an appropriate landfill suitable for these polluted materials. I do not live in Port Angeles, but I visit the Olympic Peninsula often to fish and hike. I often stay in Port Angeles and enjoy the community and its surroundings. The community is working hard to diversify its economy including expanded tourism and associated visitations. The community deserves a full and thorough cleanup of this facility and Ennis Creek must be restored for its salmon, steelhead, and coastal sea-run cutthroat. Rayonier benefitted for over 70 years from substantial profits from running the mill and the logging of the amazing ancient forests of the Olympic Peninsula. The community, its people, and the fish and wildlife that utilize Ennis Creek deserve the benefit of a fully restored site that has all the toxic contaminants removed. This is the just and fair solution after the years of profit taking by Rayonier. A restored site, and a restored Ennis Creek provides important economic and environmental benefits to the community. It also keeps faith with cultural and other uses of the Lower Elwha Klallam Tribe. Please select and implement SL5!

Athair, Elizabeth

Date: 8/12/25
Method: Website
Comment: See below.

I wish to recommend that the Cleanup is done by taking the toxic waste in containers to a separate facility away from here

designated

specifically at a toxic waste facility that is not near here and not allow it to remain here buried underground in containers .

It is a high risk to our local sea, beach and region being vulnerable and dangerous in severe storm tsunami conditions that

could potentially happen in the future.

Atkinson, Janet

Date: 8/9/25
Method: Website
Comment: See below.

Level 5 cleanup is the ONLY option that the Dept. of Ecology should consider for the former Rayonier Mill site in Port Angeles, WA.

Aurnou, Elizabeth

Date: 8/12/25
Method: Email
Comment: See below.

Please completely clean up the Rayonier Mill site. It is a stain on the community. A friend of mine decided not to move here because of the Rayonier “superfund” site. Please fund a complete clean up of the area.

Thank you,

Elizabeth Aurnou

B, Lauren

Date: 8/2/25
Method: Website
Comment: See below.

Rayonier Mill has left our community with a huge ecological mess. I'm confident that we were all taught at a young age to clean up after ourselves and leave places better than when we first found it. This company has more than enough funds and should be held accountable to this basic life lesson. We saw at our special city hall meeting that the decision from both the council and attendees was unanimous: there is no option beyond option 5. Clean up your mess in its entirety. Do not just throw a rug (dirt) over it, fence it off, and call it good.

Bahnsen, Patrice

Date: 8/10/25
Method: Website
Comment: See below.

My husband Thomas Pierce and I both believe and support option 5, total cleanup. We live in a magnificent area and should be rid of the toxic soil and not wait for some disaster that could cause even more issues.

Bailey, Elaine

Date: 7/8/25
Method: Website
Comment: See the following two pages.

DEPARTMENT OF ECOLOGY
State of Washington

Please Write Clearly or Go Online:
go.ecology.wa.gov/comment2270

Public Comment Form

1 Comment | 2 Review | 3 Your Copy

Commenting open: **June 12, 2025 8:00 AM PT—August 12, 2025 11:59 PM PT.**

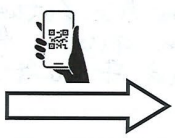
Port Angeles Rayonier Mill: Consent Decree, Draft Interim Action Plan, and SEPA Checklist & Determination of Non-significance

Please note that this comment form is for the purpose of submitting a comment to the Washington Department of Ecology. Commenter contact information is optional. Contact information is necessary if you want to receive future notices or responses related to this topic.

We would like your input on the following documents:

- **Consent Decree** – To move the cleanup forward, Ecology will enter into a legal agreement called a consent decree with the parties responsible for cleanup—Rayonier A.M. Properties LLC and Rayonier Advanced Materials (collectively referred to as "RAMP" or "Rayonier"). The consent decree is a legal agreement that would require RAMP to carry out Ecology's Interim Action Plan.
- **Draft Interim Action Plan** – Ecology's proposal of how to clean up the study area. It includes a schedule and cleanup requirements.
- **State Environmental Policy Act (SEPA) Determination of Non-Significance** – Based on an environmental checklist, Ecology has determined that the proposed cleanup is not likely to result in significant environmental impacts.

Scan the QR code to learn more about the cleanup or review documents.



Contact Information

All fields are optional unless otherwise indicated.

Submitted by: (Check one and write name)

- [X] Individual (add name below)
- [ ] Organization: _____
- [ ] Agency: _____
- [ ] Other _____
- [ ] Business: _____

First Name	Last Name
ELAINE ~~M~~ Bailey	Bailey

Address	City/Town
207 W. 12th St	Port Angeles

Country: ~~WA~~ Clallam

State/Province	ZIP
Wa	98362

Email: elainembailey@earthlink.net

Please write comment clearly on other side:

DEPARTMENT OF ECOLOGY
State of Washington

Please Write Clearly or Go Online:
go.ecology.wa.gov/comment2270

Public Comment Form

1 Comment | 2 Review | 3 Your Copy

Your Comment

Comments are due by August 12, 2025 at 11:59 p.m.
To make a comment, please enter your comment(s) in the text area. To submit attachments please visit Ecology's online comment form at https://go.ecology.wa.gov/comment2270.

Any information (e.g., personal or contact) you provide on this comment form or in an attachment may be publicly disclosed and posted on the Internet.

To submit comments for a group please visit our "Commenting Tips" webpage at https://ecology.wa.gov/About-us/Get-involved/Public-input-events/Commenting-tips

Next Steps: After the close of the comment period, Ecology will review and consider all comments received as we finalize the documents and respond accordingly.

What consideration has there been with the rise of ocean ? As climate change and melting continues what effect will your actions have for the future. — What consideration has been given to the possibility of the Cascadia Fault —

DEPARTMENT OF ECOLOGY
State of Washington

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

Accessibility: https://ecology.wa.gov/About-us/Accountability-transparency/Our-website/Accessibility

Bailey, Elaine

Date: 8/10/25
Method: Email
Comment: See below.

The only solution is SL 5! Why should Port Angeles be forever a toxic waste site? Covering a huge area with soil etc. with SL 3 creates a hazard that will continue forever. but the chances of climate change water rising and or the Cascadia event puts Port Angeles in harms way forever. We owe our children and grandchildren more than leaving them with a toxic hazard. Solution is SL5!!!

Thank you for making our life safer

Elaine Bailey

Bair, Steven

Date: 8/10/25
Method: Website
Comment: See below.

I have read and reviewed the Interim Action Plan (February 2025) and strongly disagree with the conclusion that Soil Alternative SL-3 should be selected based on cost-benefit ratios. The only alternative consistent with the goal of long-term safety and future use would be Alternative SL-5.

The City of Port Angeles, as the future custodian of much of the site, has already submitted comments in favor of SL-5. I seriously wonder if a more politically powerful local government would have its concerns ignored the way adopting SL-3 would treat the citizens and city of Port Angeles.

Baker, Norman

Date: 7/29/25
Method: Email
Comment: See below.

From: Norman Baker
To: Sixkiller, Casey (ECY)
Subject: Rayonier Pulp Mill cleanup plan
Date: Tuesday, July 29, 2025 10:31:54 AM

Mr Sixkiller and Dept of Ecology;

The following points are important in the Rayonier Pulp Mill Cleanup and I support them all.

Support the Port Angeles City Council decision - Option 5

• Tell Ecology to factor in to its cleanup cost analysis impacts to fish, wildlife, the environment and human health

• Support a full cleanup, not a coverup of soils and sediments. Remove all contaminated soils and sediments.

• Oppose leaving contaminated soils and sediment; then having to monitor them for 30 years.

• Support short- and long-term protection of the environment and public health; not a cheaper cleanup cost for Rayonier

• Remove all soils from the remaining concrete pad built hundreds of feet over the Harbor on fill that once held Rayonier's pulp mill

• Do not pile onto the concrete pad toxic sediments or wharf infrastructure; send these to appropriate hazardous waste landfills.

• Remove the concrete pad and restore the original shoreline now under the foundation

• As soon as possible relieve remove that dock pilings covered with creosote that is harmful to fish and other marine life.

• Ensure Ennis Creek is restored to its original shape and given space to continue the movement essential for a salmon stream

• Recreate the brackish water at the mouth of Ennis Creek for the salmon

• Support returning this area to its natural state to attract wildlife and connect it with the wildlife corridor to the east towards Sequim and Jefferson County.

• Oppose rebuilding on the site. Construction will face the same climate conditions as the mill infrastructure - sea level rise, storm surges, tsunamis, earthquakes,

• Ensure the Natural Resource Damage Assessment parties complete their work for cleaning up and providing other restoration for federal resources contaminated by the Rayonier Pulp Mill. The decision makers are NOAA, USFWS, the Klallam Tribes and WA State Ecology

• Support solid and high fencing surround the upland polluted area along with large signs that fully inform the public of the cleanup and the importance of staying off the site.

* Keep the public updated as the cleanup moves forward.

Norman T. Baker, PhD

Baker, Norman

Date: 8/11/25
Method: Website
Comment: See below.

Please Choose Alternative SL5 for a Permanent Cleanup of the Rayonier Mill Site

Marian Abbett, Site Manager Washington Department of Ecology PO Box 47775 Olympia, WA 98504-7775

I am writing as a concerned citizen and a member of the Port Angeles community to express my strong support for Alternative SL5 for the cleanup of the former Rayonier mill site. This is a critical issue for the long-term health of our community and the unique marine habitat of our waterfront.

The Port Angeles waterfront is a vital resource and a home to critical species, including our endangered Southern Resident killer whales, salmon, and migratory birds. The contamination at the mill site, including PCBs, dioxin, and heavy metals, poses a significant and ongoing threat to this sensitive ecosystem.

Alternative SL3, which involves simply capping the site, is not a permanent solution. This temporary fix ignores the very real risks of sea-level rise, coastal erosion, earthquakes, and floods that could breach the cap and re-release pollutants into our waters.

A complete and permanent cleanup is long overdue. I urge you to select Alternative SL5, which involves the full removal of all contaminated soil. This is the only lasting solution that will truly protect our community and our environment for generations to come.

I believe the benefits of SL5 are vastly understated, and the costs of SL3 are not accurately estimated. The long-term health of our community is a benefit that cannot be measured in simple terms.

[Add a few sentences here about why the Port Angeles waterfront is important to you personally, or why you care about this issue.]

Please, for the sake of our community and our environment, choose Alternative SL5.

Sincerely,
Norman T. Baker, PhD

Barclay, Stephen

Date: 8/12/25
Method: Website
Comment: See below.

Please select SL-5 as the preferred alternative for the cleanup of the Rayonier Mill contaminated site. Option SL-3 is a temporary measure that will result in further contamination of the bay, and will result in additional cleanup efforts when the short-sighted containment methods are breached in the coming decades. Rayonier must be held accountable for the hazardous contamination they have left in Port Angeles. Choosing option SL-5 and removing the toxic waste to an appropriate off-site landfill is the only responsible and long-term cost-effective action. Thank you for the opportunity to express my views on this critical topic.

Barkie, Rhiana

Date: 8/12/25
Method: Website
Comment: See below.

I empathize with Ecology staff. Before I moved out here to live with my parents, I was the Program Manager for the City of Indianapolis Brownfield Program. I was project and then program manager in brownfield redevelopment for over 5 years. So I've got atleast some familiarity with the struggle to pay for cleanups, the regulatory constraints, and the advantage that wealthy Responsible Parties have in avoiding the financial burden of full cleanups of their own messes.

I empathize with Ecology staff, but I must join other voices in demanding that Rayoneir pay for all contaminated soil to be removed. There are many times a cap is an appropriate mitigation/remediation technique. This is not one of those times.

We can look at maps of projected coastal erosion as an effect of climate change, but I don't think that we can ultimately model out just how bad it could be. Can we really trust that same cap won't soon be underwater, eroded by fluvial processes until the contaminants are once again harming the rest of the environment?

In addition to my skepticism regarding the limits of coastal erosion and tide incursion,I fail to see how economically this isn't just a net loss to our community. This land has sat unused for decades, and will continue to for atleast another decade or two. Decades of lost tax revenue, maybe affordable housing or mixed-use commercial areas. Maybe cleaner, more modern industry that is much lighter on the environment while still providing

just as many jobs. And that potential will continue to be unfulfilled and rotting away because the site was remediated just enough to industrial regulatory standards, but not to commercial or residential. Our community has a high cost of living, but it also just doesn't have enough affordable, attainable housing. We have little boutiques, but we don't have a dearth of good-paying jobs that can match the high cost of living. If we're going to spend so many years just to do the cleanup that is planned, we may as well go that extra bit and have all the contaminated soils hauled away.

Our community, like many others, is seeming to be transforming into one that is deeply divided, with neighbors against neighbors. I think a major reason for that is economic strain. Everybody is hurting right now while the big corporations and oligarchs continue to siphon tax dollars from all our pockets, convincing us to turn on each other instead of holding the real Responsible Parties, well, Responsible. Maybe part of what would heal our country is for economic growth of and investment into our rural communities to not be stifled by megacorporations manipulating regulatory frameworks to their own selfish ends.

I don't care how pompous I sound with dropping my brownfield redevelopment experience. I don't care how dramatic I sound with my analysis. Our community deserves better, and I can't sit idly by in silence when I know we are due better.

Other aspects of the proposed cleanup plan seem fair and reasonable to me.

Barley, Michael

Date: 8/8/25
Method: Email
Comment: See below.

Dear Site Manager Mariam Abbot,

I live in Port Angeles and regularly take walks on the trail along the bay. At the July 8th public meeting I was very disappointed to learn that the clean up plan was for a partial clean up only. I want to encourage the DOE to reconsider their plan and work for a Level 5 clean up. Rayonier has made many millions of dollars and left town leaving a contaminated Super Fund site. They should be held responsible for leaving it in the same condition as it was when they built the mill. I'm looking forward to the day when my walk along the bay does not include having to pass by the fenced in area of the mill site.

Sincerely,
Michael Barley

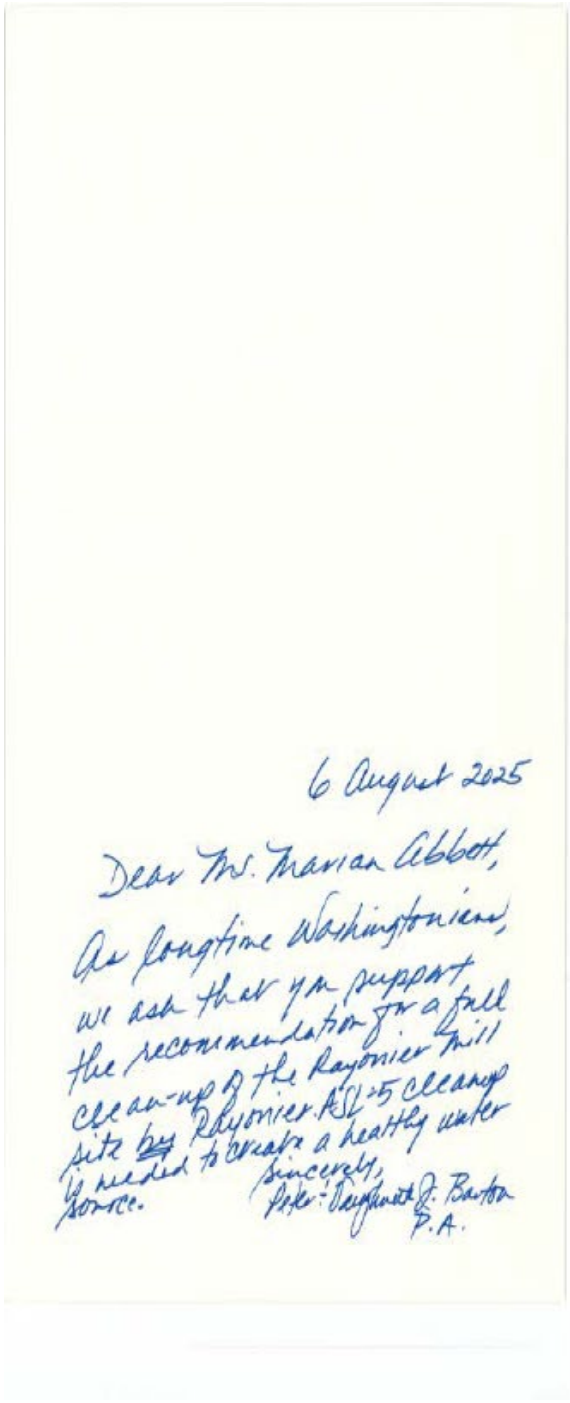
Barrington, Vanessa

Date: 7/27/25
Method: Website
Comment: See below.

I walk along the waterfront adjacent to the Rayonier site on a regular basis. When I look at the industrial wasteland situated in such a beautiful place and think about all the contaminants still there and the creosote out in the water, continuing to contaminate it, I think about how wonderful it would be for the community, visitors, and wildlife to have the site fully cleaned up and safe for the community to use, the creek restored so salmon and other wildlife can thrive, and a useable beautiful outdoor area near the water for the community and visitors alike to enjoy. Having read about the different cleanup options and learned a little about how this company has behaved in a bad faith way toward the community in the past, I believe SL-5 (the complete clean-up) to be the only way to go. Anything less is a shame. Our beautiful country is littered with such sites that companies have left behind after extracting all the profits they can and leaving the communities behind to deal with their toxic mess. We need to do better. Port Angeles deserves better.

Barton, Peter

Date: 8/6/25
Method: Letter
Comment: See the following two pages.



6 August 2025

Dear Ms. Marian Abbott,

As longtime Washingtonians, we ask that you support the recommendation for a full clean-up of the Rayonier Mill site by Rayonier. ASL 25 cleanup is needed to create a healthy water source.

Sincerely,
Peter Dargatz & Barbara J. Barton P.A.



EARTH RHYTHMS
PHOTOGRAPHY
© Nirvan Hope
nirvanhope@gmail.com
www. nirvanhope.com

Barton, Vaughnetta

Date: 8/7/25
Method: Email
Comment: See below.

From: Vaughnetta J Barton vajbarton@comcast.net
Sent: Thursday, August 7, 2025 7:34 AM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Cc: KDexter@cityofpa.us; NCarr@cityofpa.us
Subject: Rayonier Mill SL-5 Cleanup

Dear Ms. Abbett,

As a follow-up to renewed conversations regarding the Rayonier Mill site, I support Port Angeles City Council's request that Washington State Department of Ecology work toward a cleanup of the Rayonier Mill site.

It is my understanding that the Department of Ecology is unsure how to move forward with public officials' requests—made on behalf of voters, taxpayers, and visitors—and has proposed a SL-3 cleanup.

As a follow-up to this message and following the public comment period, it would be valuable to know the Department of Ecology's timeline for a SL-5 cleanup at the Rayonier site.

Given the Department of Ecology's purpose statement, "We are proud to protect, preserve, & enhance Washington's environment for current and future generations", citizens need the Department to Ecology to hold Rayonier accountable for a SL-5 cleanup.

Respectfully,

Mrs. V.J. Barton
Port Angeles, WA
vajbarton@comcast.net
Nothing can stop the power of a committed and determined people to make a difference in our society. -Congressman John R. Lewis (1940-2020)

Bartron, Janice

Date: 8/10/25
Method: Website
Comment: See below.

I am writing to support Level 5 cleanup of the former Rayonier Mill site in Port Angeles, WA

I support Level 5 cleanup as the ONLY option that the Dept. of Ecology should consider for the former Rayonier Mill site in Port Angeles, WA.

Baumann, Cheryl

Date: 8/12/25
Method: Website
Comment: See below.

Public Comment on Proposed Rayonier Clean Up, August 12, 2025

Dear Department of Ecology Clean Up Staff,

As a City of Port Angeles resident who was here when the Rayonier Mill closed, it is extremely frustrating to know we have waited almost 30 years for a massive clean up on our waterfront, only to learn that what is being proposing is a non-permanent solution which involves covering up the site and fencing it off, rather than an actual and total clean up. This is unfair to the citizens of Port Angeles and other state residents who think that polluters should be accountable for not only cleaning up their messes, but doing so in a timely manner. That is the message we want to send to those whose work results in polluted lands and waterways.

What is being proposed in Port Angeles does the exact opposite. It is literally more of a cover up than a clean up, and it has dragged on for decades. What's worse, the proposed alternative involves covering over 10 acres of toxins with dirt and fill, capping a 7 foot high mound and fencing off that site along the water's edge. We are not comfortable with the non-permanence and rammifications of toxins leaching out over time or having a toxic eyesore of a mound spoiling the view for residents and tourists alike. With sea level rise and more frequent and intense storms as a result of the climate crisis, that could mean a serious storm washing away the polluted sediments, releasing and spreading toxins in the environment, and then forcing another decades long "clean up" process.

That makes no sense. I agree with the City of Port Angeles whose consultant asserts that the analysis provided does not accurately reflect realistic proposed costs for the capping alternative, while overestimating the cost of carting the toxins off site, and not considering the costs of being unable to use that land or the views it blocks or the harm to endangered species like ESA-listed salmon and forage fish impacted as a result. While it will take many truckloads to haul the contaminated soils offsite, how is that different then the many trucks which used to carry products from the Rayonier Mill or the many dangerous chemicals previously trucked in for the Mill's paper-making process? Collecting and hauling off the polluted sediments makes much more sense compared to just collecting it

and capping it at the water's edge, resulting in an unstable problem being left for the next generation of Port Angeles residents. Not to be forgotten is how much less expensive this project would have cost had it occurred 30 years ago when the mill closed. The attempt to run out the clock has resulted in significant cost increases. That does not mean the good people of Port Angeles should now be shortchanged in terms of clean up.

We have but one chance to get this right and that time is now. I support proposal SL-5 which is an actual full site clean up. The City and its residents deserve no less and it's the company's responsibility to right this wrong. We expect our state government to advocate for us in terms of protecting our lands, air, waters and viewscapes. We deserve no less.

Thank you for your consideration of this comment.

Cheryl Baumann
Resident, City of Port Angeles
baumannnw@yahoo.com

Baumann, Cheryl

Date: 8/12/25
Method: Email
Comment: See below.

Public Comment on Proposed Rayonier Clean Up, August 12, 2025

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Thank you for your consideration of this comment.

Cheryl Baumann
Resident, City of Port Angeles
baumannnw@yahoo.com

Beldin, Joan

Date: 8/7/25
Method: Email
Comment: See below.

From: Joanie Beldin joanibldn@gmail.com
Sent: Thursday, August 7, 2025 11:22 AM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Cc: Sixkiller, Casey (ECY) csix461@ECY.WA.GOV
Subject: Port Angeles Rayonier Mill Public Comment

Dear Site Manager Mariam Abbot,

I thank you for this opportunity to comment on the proposed options for the clean-up of the Rayonier Mill site.

I live in Port Angeles and regularly take the walkway that passes the chain link fence guarding the Rayonier Mill site. This is a popular walkway used by visitors from all over the country and the world. Not only is this site offensive to what is otherwise a scenic part of our town, but more importantly, it has been left as an area contaminated for decades from industrial pollution, once considered a Superfund site until that label was removed, not because it wasn't deserving of it, but due to city embarrassment. This site is a blight on our community.

DOE now has the opportunity to demand that the owner of this polluted site clean up the mess that it created. Rayonier is responsible for the contamination it left in the wake of its closure and they should be fully responsible for cleaning it up to its fullest extent.

I attended the July 8th public meeting put on by DOE. I was dismayed to hear this agency say that in spite of the fact that the majority of the local comments it receives and in spite of the stance of the Port Angeles city council demanding a full and complete cleanup, Rayonier cannot be required to do a full clean-up. Of course, Rayonier will never volunteer to do so. Rayonier can easily afford the costs of a complete clean-up. I was very disappointed to hear DOE stand behind Rayonier rather than the people of this state who DOE should be most responsible for.

I am making the following requests:

-- Follow the Port Angeles City Council recommendation and select Option 5 calling for a complete cleanup.

-- Remove all contaminated soils and sediments. Option 3 does not factor in the inevitable event of an earthquake or unknown impacts of climate change. There are no guarantees with a cover up in the long term. It makes no sense to do a partial job that may bring contaminants back to the surface and will need to be redone later at a greater cost not only in the monetary sense, but in cost to the environment and human health.

-- The current site must be restored to its natural state, prior to the building of the Rayonier Mill. Prioritize the needs of our fish in this decision. Ennis Creek, whose waters run into this site, is our last best chance for a salmon creek in this city. No fish have been seen swimming up this creek for several years. In order to provide for their habitat needs, the following steps need to be followed:

- Recreate an estuary to replace brackish water of a salt marsh Rayonier paved to create a parking lot. Salmonids need a mixture of fresh and saltwater to make physical adaptations as they leave the freshwater. Provide for a more naturally flowing stream such as is essential for a salmon stream and remove all pollutants entirely.

It is not unusual to see Southern Resident Orcas swimming in the waters near Port Angeles. These whales feed almost solely on salmon. It is well known that these whales are in danger of extinction due to the steep decline of salmon in the Strait and Sound. Creating a salmon stream in Ennis Creek will provide these whales with one more source of life saving salmon.

-- Oppose any rebuilding on this site. Returning it to its natural state, it will attract wildlife and will become part of the wildlife corridor connecting natural areas east and west of the site.

By choosing the option for a full and complete cleanup, DOE has the opportunity to change this site from one of a blight to an area of pride and an enhancement to our community.

Rayonier created this highly polluted and contaminated site. It must take responsibility and cover all costs. DOE must do right for the community of Port Angeles by holding them to this responsibility.

Thank you for your consideration.

Sincerely,

Joan Beldin
Port Angeles

Bengtson, Steve

Date: 8/11/25
Method: Website
Comment: See below.

I support level 5 cleanup of the former Rayonier mill site in Port Angeles Wa.

It is long past time to clean this toxic mess up.

Bengtson, Sandy

Date: 8/11/25
Method: Website
Comment: See below.

I support level 5 cleanup of the former Rayonier mill in Port Angeles WA, our waterfront is valuable and should be more then a toxic wast dump

---

Birmingham, David

Date: 8/7/25
Method: Website
Comment: See below.

I feel that the Mill Site must be completely cleaned of all contaminants so that no possibility of continued contamination of Ennis Creek and the harbor exists.

Thank You,

David Birmingham

Birmingham, David

Date: 8/7/25
Method: Email
Comment: See below.

From: David Birmingham dab@wavecable.com
Sent: Thursday, August 7, 2025 8:26 AM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Subject: Port Angeles Rayonier Mill Site

As a citizen of Port Angeles I am urging a complete clean up of all toxins from the Port Angeles Rayonier Mill site.

Thank You,

David Birmingham
dab@wavecable.com

Blaeloch, Janine

Date: 8/5/25
Method: Email
Comment: See below.

From: Janine Blaeloch blaeloch@gmail.com
Sent: Tuesday, August 5, 2025 2:10 PM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV

Cc: Sixkiller, Casey (ECY) csix461@ECY.WA.GOV
Subject: comments on Rayonier cleanup

Dear Ms. Abbett:

I am a resident of Clallam County who often visits the area near the Port Angeles Rayonier Mill site, often by bicycle on the Olympic Discovery Trail. This letter constitutes my comments on the cleanup.

I attended the Ecology presentation at Field Hall as well as the virtual meeting/presentation at Port Angeles City Hall. It is clear that the best and only option for the cleanup is Option 5.

The public has paid a huge price for the damage Rayonier did through its operations and continues to do through the delays in cleanup, and should accept nothing less than the total cleanup of the site.

Leaving contaminated materials onsite would mean that the public would continue to bear the burden, risk, and uncertainty associated with them, including the potential for climate-related factors that could undermine their stability. All contaminants must be removed from the site.

It was clear from the presentation made by the City's consultant that the cost for Option 3 was underestimated, and the cost for Option 5 overestimated. With these options closer in cost than suggested by Rayonier's/Ecology's analysis, and factoring in the risk of retaining and capping the materials onsite, there is no excuse to do less than full cleanup through Option 5.

Cleanup and restoration of Ennis Creek must be completed as soon as possible. The site should be left undeveloped, and when safe should be made accessible to the public, which has endured the presence of this toxic eyesore for decades.

Thank you for accepting these comments.

Janine Blaeloch
153 Glendale Drive
Sequim, WA 98382

Blankenship, Bianca

Date: 7/24/25
Method: Website
Comment: See below.

SL-5 is the only appropriate solution to cleaning up the Rayonier Mill site. SL-5 best protects the future of Port Angeles's citizens, industry (tourism, fishing, etc.), and health. Please consider the effects of rising sea levels and a severe earthquake (and potential following tsunami) when deciding how and where this waste should be disposed of. And hold Rayonier financially accountable for the harm it has done to the community.

Bless-Boenish, Bonnie

Date: 8/9/25
Method: Email
Comment: See below and the following page.

Attached is the comment from the League of Women Voters of Clallam County.

Thank you,

Bonnie

--

Bonnie Bless-Boenish

LEAGUE OF WOMEN VOTERS® OF CLALLAM COUNTY

Marian Abbett, Site Manager
WA Department of Ecology
P.O. Box 47775
Olympia, WA 98504-7775

August 9, 2025

Re: Port Angeles Rayonier Mill Public Comment

Marian Abbett,

The League of Women Voters of Clallam County wants to thank you for your public outreach opportunity on this important topic for our community. Since 1988 when voters passed I-97, an initiative written by the LWVWA and other environmental groups, the League had been a strong supporter of meaningful protection for public health and the environment.

The LWVCLA supports your statement that Rayonier must live up to the highest safety standards, to allow for a variety of future uses of the property. Alternative SL-5, requiring the removal of contaminated soil, is the only alternative that meets this goal. SL-5 thus provides the greatest benefit and is the only permanent environmental remedy for the Rayonier site. The City of Port Angeles, the Clallam County Commissioners and the Port Angeles Business Association all support the selection of Alternative SL-5.

During public hearings in Port Angeles, questions were raised regarding the cost/benefit analysis of these alternatives. Speakers were concerned that the cost for SL-3 was underestimated, and that the cost for SL-5 was overestimated. They were also concerned that "technical and administrative implementability" was over-scored for SL-3 and under-scored for SL-5. In addition, concerns were raised regarding the fencing of ten acres of the property, thirty years of post-construction monitoring, and the commitment to ongoing maintenance by the property-owner. Finally, a clean-up schedule of 7-10 years seemed optimistic, given the decades it took for the site to reach its current state. When an adequate schedule is set, the LWVCLA believes that the clean-up of Ennis Creek, its estuary and its riparian areas, should be given first priority.

Thank you for giving us the opportunity to comment on the proposed clean-up of the Rayonier Mill site in Port Angeles.

Sincerely,

Helle B Andersen

Helle Andersen, Council of Directors,
League of Women Voters of Clallam County

Boyes, Walt

Date: 8/10/25
Method: Website
Comment: See below.

The only cleanup method the entire Port Angeles community supports is to do 100% remediation and remove ALL of the toxic material on the site, remove the creosote soaked piles, and repair the damage to Ennis Creek. The Rayonier Mill Site is located in a central area and if not remediated completely, it will forever stall development of the waterfront of Port Angeles.

Brakauskas, Victor

Date: 8/8/25
Method: Website
Comment: See below and the following 11 pages.

There is no moral case for choosing a clean up option that priortizes greater company profits over the duty to clean up contaminants in the community that will be affecting our children and grand-children.

'Capping' waste is merely a stop-gap solution that will continue to pollute. Please choose the most comprehensive clean up plan for our community (option 5 in the attached powerpoint)



Port Angeles Rayonier Mill Public Comment Period

Marian Abbett, P.E., Section Manager TCP-SWRO and Site Manager
Connie Groven, P.E., UST/Technical Support Unit Supervisor
Abby Zabrodsky, Public Involvement Coordinator
July 8, 2025

1

Rayonier Mill Public Review

Consent Decree, Draft Interim Action Plan, SEPA Determination of Non-significance

Schedule of Events

5:00-6:00 Open House
6:00-7:15 Presentation and Q&A
7:15-8:00 Open House

Public Comment Period

Comments accepted until **August 12, 11:59 PM**
Submit comments online:
go.ecology.wa.gov/comment2270

Ecology's Rayonier Mill Webpage

Submit your comments online

2

Introductions

Ecology Project Team	
Bobbak Talebi	Southwest Region Director
Nhi Irwin	Toxics Cleanup Program Manager
Marian Abbett	Section Manager/Project Manager
Connie Groven	Unit Supervisor
Nancy Davis	Environmental Planner
Thomas Praisewater	Environmental Engineer
Valerie Chu	Toxicologist
Abby Zabrodsky	Public Involvement Coordinator
Carolyn Subramaniam	Public Involvement Coordinator
Sarah Miller	Public Involvement Coordinator

3

Documents Available for Comment

We are accepting comments on:

- Consent Decree
- Draft Interim Action Plan
- State Environmental Policy Act Determination of Nonsignificance and Checklist

4

Document Review

In-person document review

Port Angeles Main Library
Ecology Lacey Office (by appointment)

- PublicDisclosureSWRO@ecy.wa.gov
- or 360-407-6365



Online review

Visit go.ecology.wa.gov/2270



5

How to Comment

Comment period will close
Tuesday, August 12 at 11:59 PM

Submit comments online

go.ecology.wa.gov/comment2270

Or by mail or email

Marian Abbett, Site Manager
WA State Department of Ecology
PO Box 47775
Olympia, WA 98504-7775
Marian.Abbett@ecy.wa.gov

6

Comment Response

After the comment period, we will:

- Consider your comments
- Update the documents as needed
- Respond to comments in a comment responsiveness document

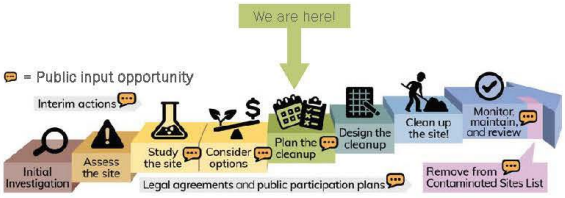
Presentation Overview

1. Washington's Cleanup Process
2. Rayonier Mill Study Area Cleanup
   - Draft Interim Action Plan
   - Cleanup, Structure Removal, and Restoration
   - Consent Decree
3. Next Steps

Port Angeles Cleanup Sites



Cleanup Process



Remedial Investigation and Feasibility Study (RI/FS) Process

1. Collect Data
- What?
- Where?
- How much?

2. Evaluate Risk
- Pathways

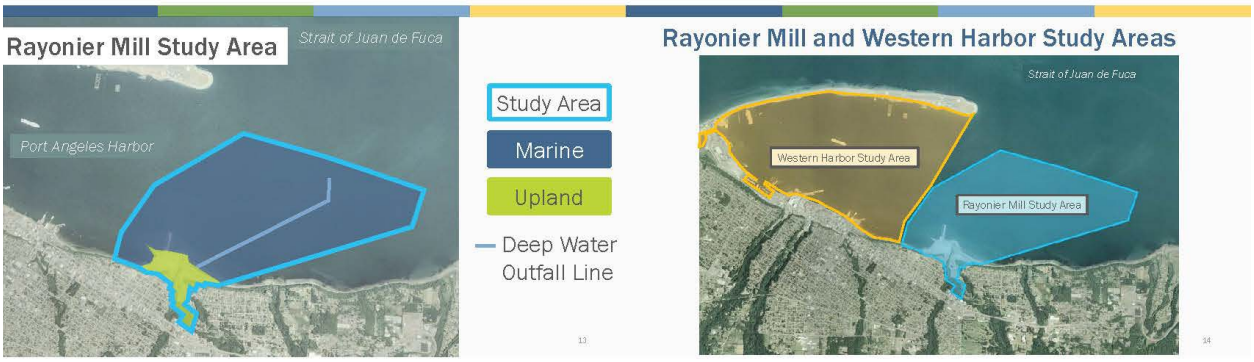
3. Set Cleanup Standards
- Cleanup Levels
- Points of Compliance

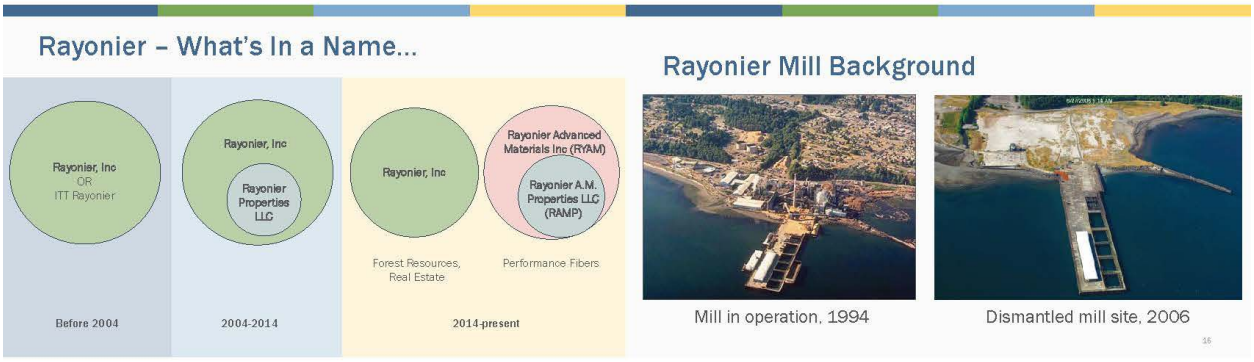
4. Evaluate Remedies
- Benefits
- Cost
- Permanence

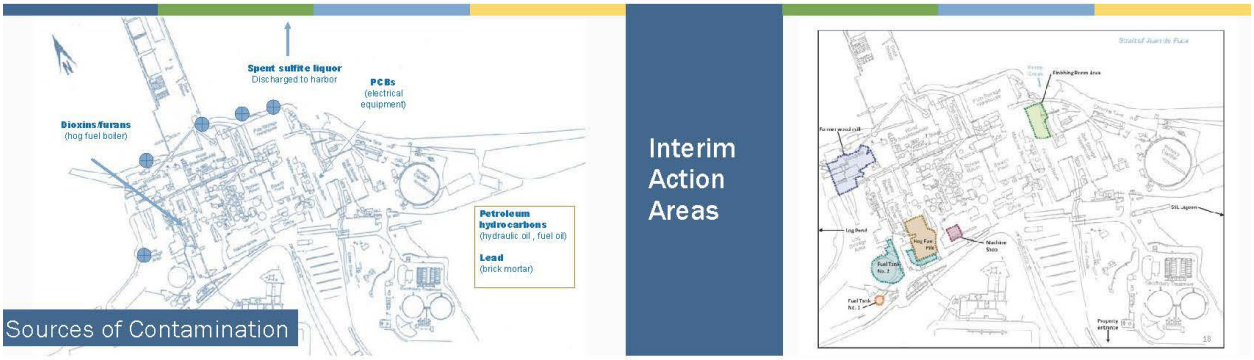
Rayonier Mill Study Area

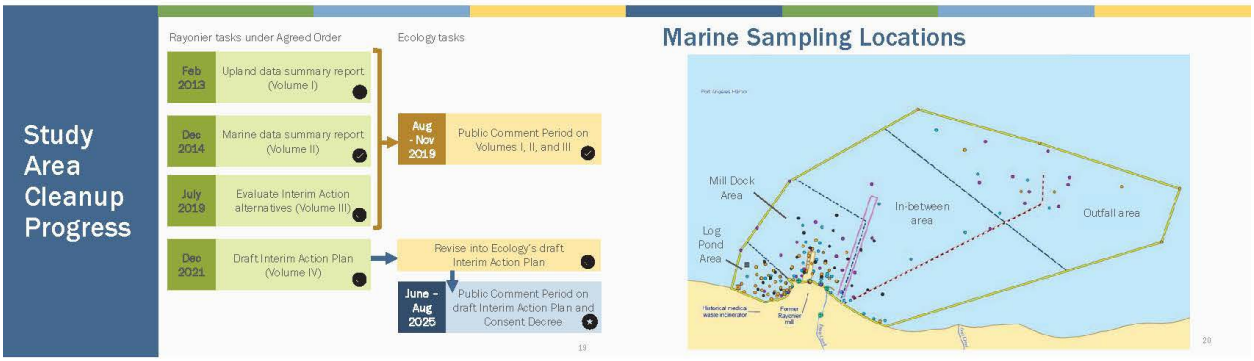


Rayonier Mill and floating log ponds while in operation


Rayonier Mill Study Area
Strait of Juan de Fuca
Port Angeles Harbor
Study Area
Marine
Upland
Deep Water Outfall Line
13
Rayonier Mill and Western Harbor Study Areas
Strait of Juan de Fuca
Western Harbor Study Area
Rayonier Mill Study Area
14


Rayonier – What's In a Name...
Rayonier, Inc
OR
ITT Rayonier
Before 2004
Rayonier, Inc
Rayonier Properties LLC
2004-2014
Rayonier, Inc
Forest Resources, Real Estate
Rayonier Advanced Materials Inc (RYAM)
Rayonier A.M. Properties LLC (RAMP)
Performance Fibers
2014-present
Rayonier Mill Background
Mill in operation, 1994
Dismantled mill site, 2006
16


Spent sulfite liquor
Discharged to harbor
PCBs
(electrical equipment)
Dioxins/furans
(hog fuel boiler)
Petroleum hydrocarbons
(hydraulic oil , fuel oil)
Lead
(brick mortar)
Sources of Contamination
Interim Action Areas
18


Study Area Cleanup Progress
Rayonier tasks under Agreed Order
Ecology tasks
Feb 2013
Upland data summary report (Volume I)
Dec 2014
Marine data summary report (Volume II)
July 2019
Evaluate Interim Action alternatives (Volume III)
Dec 2021
Draft Interim Action Plan (Volume IV)
Aug - Nov 2019
Public Comment Period on Volumes I, II, and III
Revise into Ecology's draft Interim Action Plan
June - Aug 2025
Public Comment Period on draft Interim Action Plan and Consent Decree
Marine Sampling Locations
Mill Dock Area
Log Pond Area
In-between area
Outfall area

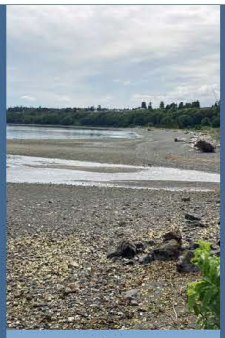

Marine Contamination
TISSUE
SEDIMENT
Metals
PAHs
PCBs
Dioxins
Metals
PAHs
PCBs
Dioxins
Phenols
Phthalates
Wood debris
Legend
Upland Study Area
Sample Location
Soil
Groundwater
Upland Sampling Locations


Upland Contamination
SURFACE SOIL 1-2'
SUBSURFACE SOIL
GROUNDWATER
PAHs
Metals
Dioxins
PAHs
Metals
Dioxins
TPH
PCBs
pH
Ammonia
PAHs
Metals
Exposure Pathways

Selected Remedy

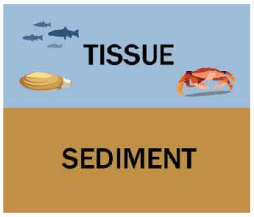
Media	Cleanup Actions	Cost (2019 $)
Sediment	SMA1 – fill berth, EMNR SMA2 – dredge intertidal; EMNR subtidal SMA3 – contingent (EMNR or thin-layer cap or dredge) SMA4 – contingent (EMNR or thin-layer cap or dredge)	$10.9M - $13M
Soil	Consolidate and cap where soil exceeds unrestricted use cleanup levels	$10M
Groundwater	Air sparging in phased approach	$5.7M
	Total	$26.6M - $28.7M

Sediment



Beach looking east

Marine Contamination

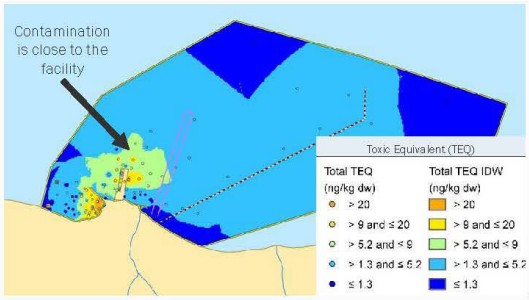


Metals
PAHs
PCBs
Dioxins

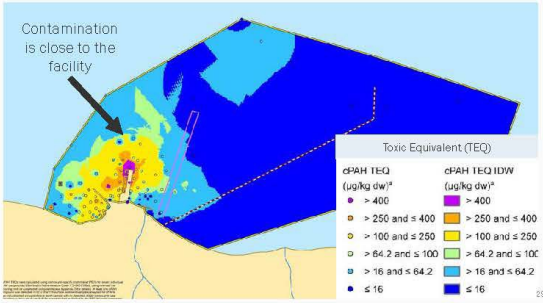
Metals
PAHs
PCBs
Dioxins

Phenols
Phthalates
Wood debris

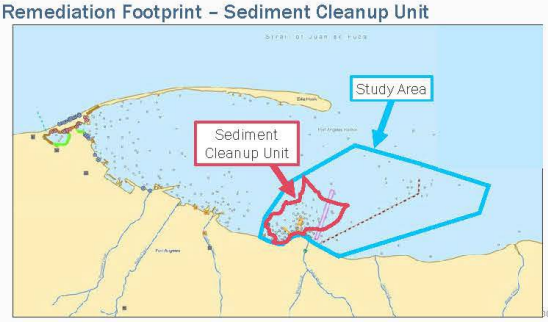
Sediment Contamination – PCB and Dioxin

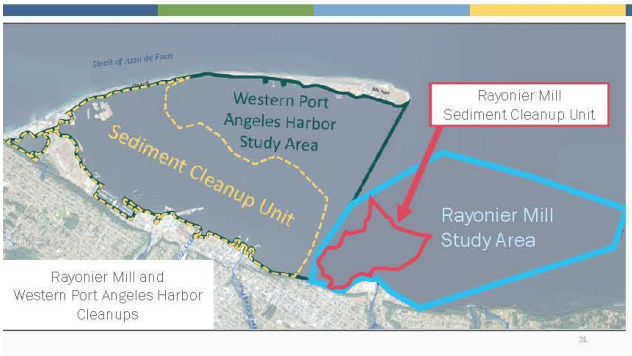


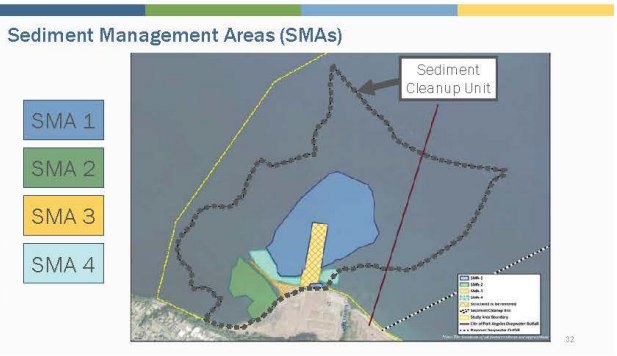
Sediment Contamination – Polycyclic Aromatic Hydrocarbons (PAHs)

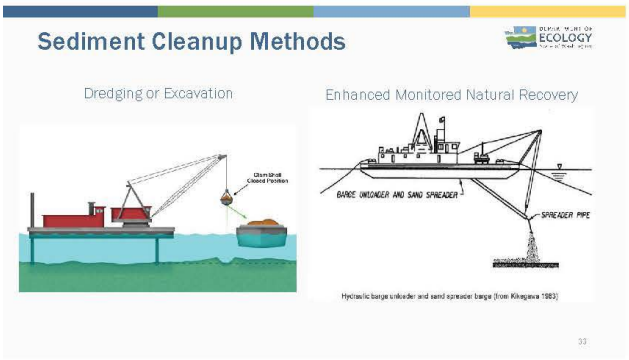


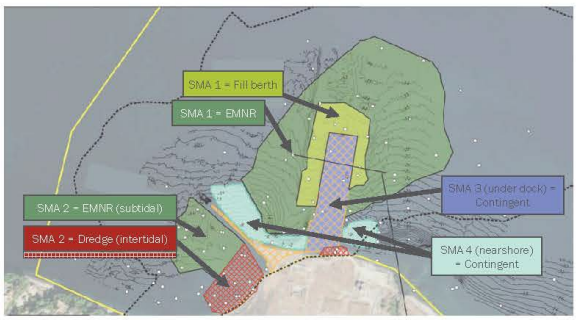
Remediation Footprint – Sediment Cleanup Unit

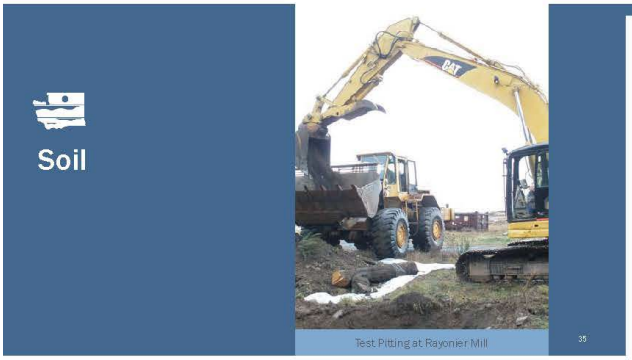


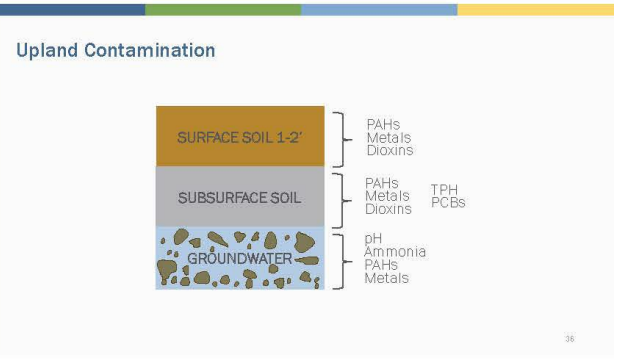

Western Port Angeles Harbor Study Area
Sediment Cleanup Unit
Rayonier Mill Sediment Cleanup Unit
Rayonier Mill Study Area
Rayonier Mill and Western Port Angeles Harbor Cleanups


Sediment Management Areas (SMAs)
SMA 1
SMA 2
SMA 3
SMA 4
Sediment Cleanup Unit


Sediment Cleanup Methods
Dredging or Excavation
Enhanced Monitored Natural Recovery
BARGE UNLOADER AND SAND SPREADER
SPREADER PIPE


SMA 1 = Fill berth
SMA 1 = EMNR
SMA 2 = EMNR (subtidal)
SMA 2 = Dredge (intertidal)
SMA 3 (under dock) = Contingent
SMA 4 (nearshore) = Contingent
Sediment Selected Cleanup Action

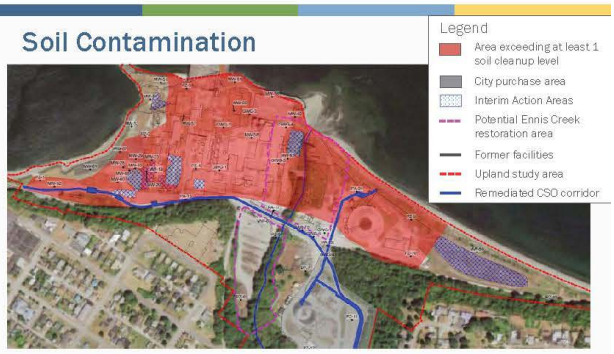

Soil
Test Pitting at Rayonier Mill


Upland Contamination
SURFACE SOIL 1-2'
SUBSURFACE SOIL
GROUNDWATER
PAHs
Metals
Dioxins
TPH
PCBs
pH
Ammonia

Zoning Map



Soil Contamination



Soil Selected Cleanup Action



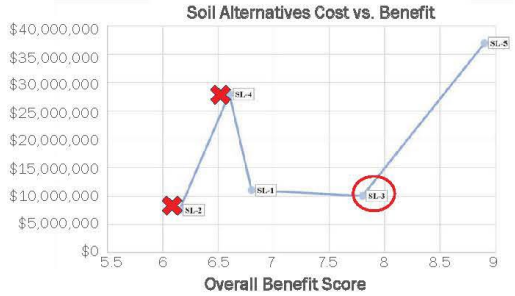
Upland study area
Potential restoration area
Shallow Excavation Area
Deep Excavation Area
Cap Area

Consolidate/Cap - Unrestricted Use Cleanup Levels

Soil Cap Example



Soil – Disproportionate Cost Analysis



Port Gamble Bay and Mill Site

- Former Pope & Talbot sawmill
- 26,000 tons of contaminated soil previously removed as part of interim actions
- Elevated dioxins remain in soil
- Cap ~6 acres of property with elevated dioxins



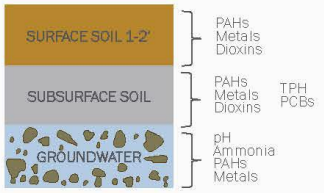
Groundwater



Drill Rig at Rayonier Mill

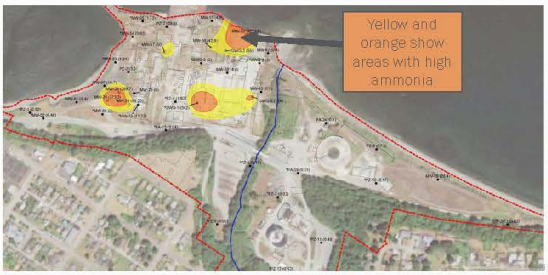
43

Upland Contamination

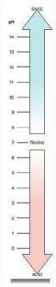


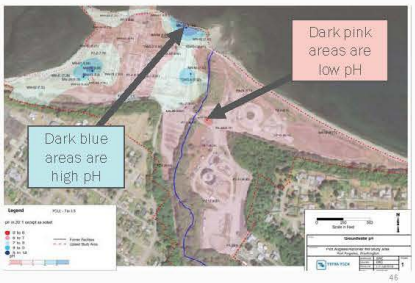
44

Groundwater Ammonia



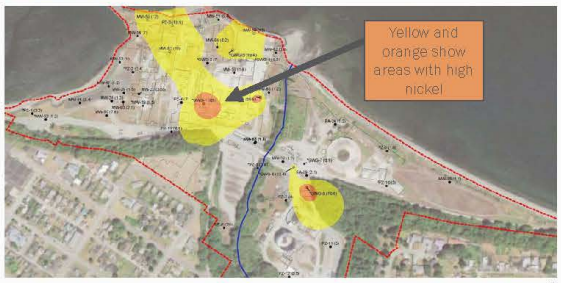
Groundwater pH





46

Groundwater Nickel

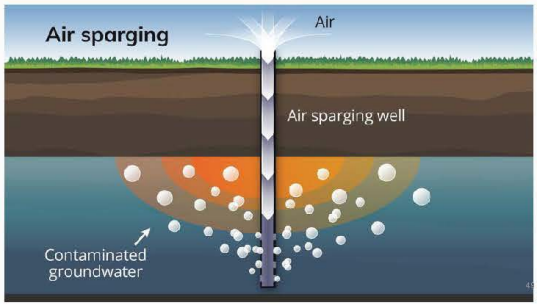


47

Groundwater Contamination



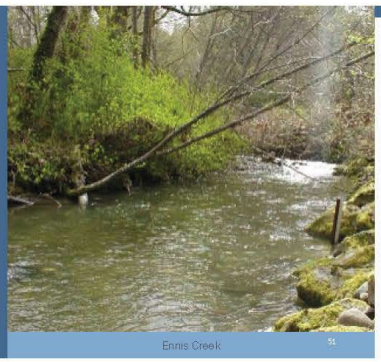
Groundwater Remedy – Air Sparging



Groundwater – Air Sparging



Surface Water



Surface Water Sampling Locations

- 5 surface water sampling locations
  - 2 upstream (White and Ennis Creeks)
  - 3 downstream
- Metals detected below cleanup levels
- Dioxins detected above cleanup levels
- Dioxin levels were the same both upstream and downstream



Selected Remedy

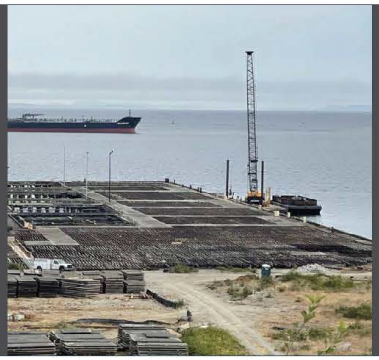
Cleanup Media	Cleanup Actions	Cost (in 2019 $)
Sediment	SMA1 – **fill berth, EMNR** SMA2 – **dredge intertidal; EMNR subtidal** SMA3 – **contingent** (EMNR or thin-layer cap or dredge) SMA4 – **contingent** (EMNR or thin-layer cap or dredge)	$10.9M - ~$13M
Soil	**Consolidate and cap** where soil exceeds unrestricted use cleanup levels	$10M
Groundwater	Air sparging in phased approach	$5.7M
	Total	**$26.6M - $28.7M**

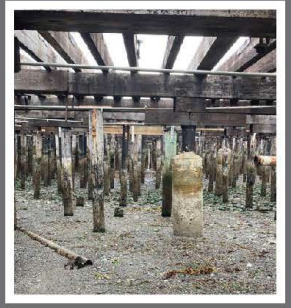
Cleanup, Structure Removal, and Restoration



Dock, Jetty and Shoreline

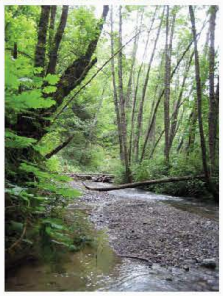






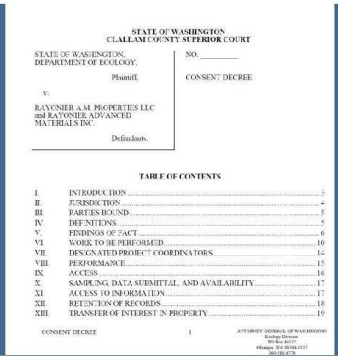


Ennis Creek Restoration





Rayonier Mill Consent Decree



STATE OF WASHINGTON
CLALLAM COUNTY SUPERIOR COURT

STATE OF WASHINGTON, DEPARTMENT OF ECOLOGY,
Plaintiff,
v.
RAYONIER A.M. PROPERTIES LLC and RAYONIER ADVANCED MATERIALS INC.
Defendants.

NO. _____
CONSENT DECREE

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CONSENT DECREE 1 ATTORNEY GENERAL OF WASHINGTON

Consent Decree

- 29 sections (I – XXIX)
  - 4 (IV) – Definitions
  - 6 (VI) – Work to be performed
- 3 Exhibits
  - Rayonier Mill Study Area Diagram
  - Interim Action Plan
  - Western Port Angeles Harbor Study Area Diagram

Next Steps



Soil excavation at Rayonier Mill during 2012/13 Interim Action

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Remedial Design and Construction Steps

Hydrodynamic Modeling and sediment sampling	• Pre-Remedial Design Work Plan • Data submittals • Sediment & Hydrodynamic Modeling Results Report
Master Plan	• Master plan and Schedule • Phases of design and construction
Data collection and engineering evaluations	• Remedial Design Work Plan • Data submittals
Remedial design and permitting	• Engineering Design Report • Construction Plans and Specs • Permits
Construction	• Monthly Progress Reports • Annual Progress Reports • Cleanup Action Report
Long-term monitoring	• Monitoring • Periodic Reviews

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Thank you!

Q&A Session



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How to Comment

Comment period will close
Tuesday, August 12 at 11:59 PM

Submit comments online
go.ecology.wa.gov/comment2270

Or by mail or email
Marian Abbett, Site Manager
WA State Department of Ecology
PO Box 47775
Olympia, WA 98504-7775
Marian.Abbett@ecy.wa.gov

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Brauner, Gayle

Date: 8/9/25
Method: Website
Comment: See below.

Each time I see wildlife in the Port Angeles harbor, I wonder how damaged they will be. People catching crabs, what are they ingesting? To allow this corporation to continually pollute the harbor over the last decades has been a travesty, and negligence by the company, the leaders in our community who supported them no matter what, the Council and City Management, the WA state dept of ecology,Port Angeles Harbor Natural Resource Trustees, Port of Port Angeles, and Clallam County Department of Health and Human Services. I've heard the lack of pollution control was to support jobs.There are times when we must choose our aquatic environment as important as human jobs. We live in an era where pollution can be controlled by various means, if there is a will. Now, the Harbor needs to be clean.

Brodahl, Jo

Date: 8/11/25
Method: Website
Comment: See below.

Option 5 should be the only choice. This situation has been unresolved for way too many years and simply trying to cover it up is not an acceptable solution. It's time to be responsible and do a complete, not half assed, clean-up! According to the 'Visit Port Angeles' website we are the…“gateway to the Olympic National Park—a top-of-the-bucket-list worthy wonder and one of few national parks in the Pacific Northwest.” It would be a shame to have to add 'and home to a toxic waste site' to the description simply because the Dept. of Ecology did not choose Option 5.

FWIW the 'Rayonier Mill Study' Table 5-1. Summary of the Soil Remediation Alternatives Evaluation states “Long-term effectiveness” shows Option 5 as “Score = 10 Most effective in long term because contamination removed from site.” Where as the Option 3 is “Score = 8 Larger excavation area than SL-2 increases the expected long-term effectiveness.”

Don't we, and the environment, deserve the 'MOST EFFECTIVE'?!?

Brown, Maxwell

Date: 8/8/25
Method: Website
Comment: See below.

Hello,

I am a local Port Angelian, business owner, and concerned citizen.

I have reviewed all of the relevant documents and have concluded that OPTION 5 TOTAL CLEAN UP is what is necessary for our community.

Thank you for reading this comment and please make the just decision for our community and environment.

Brownell, David

Date: 7/24/25
Method: Website
Comment: See below.

For 28 years, the Department of Ecology has failed its mission "to protect, preserve, & enhance Washington's environment for current and future generations." The proposed SL3 plan continues this pattern of apathy and indifference to the needs of the Clallam County and Port Angeles community. Once again, a corporation is being allowed to skirt its responsibilities for causing serious, irreparable harm to our local environment, then selling their holdings and leaving us to clean up the mess. Please hold Rayonier accountable and force them to clean up every single yard of contaminated soil from the Ennis site.

Buehner, Samuel

Date: 8/8/25
Method: Website
Comment: See below.

I agree with the City of Port Angeles in all their reasoning that Cleanup Alternative Five (SL-5) is the appropriate remedy. It will provide for permanent cleanup on the site.

Burger, Janis

Date: 7/27/25
Method: Website
Comment: See below.

I've been a resident of Port Angeles for over 44 years and saw and smelled the ITT Rayonier mill when it was operating and knew folks who worked there. I watched it narrowly avoid being a Superfund site. Now after all these years, I urge DOE to require full clean up of the site, including removal of all contaminated fill, NOT capping it. Given the current withdrawing of funds from many national projects, we're seeing how unreliable future funding may be, despite the need for ongoing monitoring in perpetuity and responding should rising sea level or an earthquake compromise the safety of the cap. Also, full clean up would open up wider possibilities for future land use. That site gets winter sun, is along the ODT, and has a beach, making it ideal for recreational use. Being in the tsunami zone would make investment in expensive development imprudent. Perhaps barging the material rather than trucking, could reduce the cost of that option. Also, I urge restoration of a natural, meandering stream channel and estuary so Ennis Creek can once again become an important salmon-bearing stream. Removal of all the creosoted pilings is important.

Byrnes, Coleman

Date: 8/12/25
Method: Website
Comment: See below.

Please choose option PL5 for remedying the toxic problem at the site of the defunct Port Angeles Rayonier Mill . Removal of the residual toxic mill wastes is the only way to protect my community from their ill effects. It is the only way to protect salmon, orcas and other marine organisms from contacting these toxins. Removal of these waste materials will also clear ground for the re-establishment of the Ennis Creek estuary, which is a vital component of any Ennis Creek salmon restoration plan. Capping the toxic soil, as advocated by PL3, is not a real solution. This option leaves the Rayonier waste in my community. Toxic soil in not a problem that should be swept under the rug. Do the right thing! Mandate the removal of the toxins. Choose option PL5. Thank you. Coleman Byrnes

---

Cambalik, John

Date: 8/9/25
Method: Website
Comment: See below.

As a frequent visitor of Port Angeles, user of the Olympic Discovery Trail, and Clallam County resident, I am writing to support Level 5 cleanup of the former Rayonier Mill site in Port Angeles, WA. Thank you for this opportunity to comment on the Port Angeles Rayonier MIll cleanup efforts.

Campbell, Andrea

Date: 8/10/25
Method: Email
Comment: See below.

I support the permanent solution of Alternative SL-5 for contaminated soil and sediment at the former Rayonier Mill site in Port Angeles, WA. Proposed Alternative SL-3, leaving contaminated soil in place forever in a capped mound which will greatly limit future development, is unacceptable and detrimental to our home. This land should be cleaned up.

Campbell, Kay

Date: 8/2/25
Method: Website
Comment: See below.

Thank you in advance for reading all comments.

I do not live in Port Angeles or the state of Washington, but over the past nearly twenty-five years, Port Angeles has become my adopted hometown -- my father, Bob Campbell, was the operations manager at Feiro Marine Life Center for fifteen years and did research on Ennis Creek at the former Rayonier site, including physically monitoring a fish trap tracking smolt on their way out of the creek. My now-grown son and I used to accompany him as he would check the trap every day and we'd get to hear the latest figures on the number of smolt coming down Ennis Creek. My dad's work would have contributed in small part to the research used to back up the enormous value -- environmental, monetary, and social -- in fully restoring the Rayonier site at a Level 5 restoration level.

Sometimes we only get one chance to do the right thing in restoring what both our logic and our hearts call for us to restore -- and this is that chance. Please support a full Level 5

restoration of this essential element of our collective future and the future for salmon and so much other wildlife and the people who depend on them in the Strait of Juan de Fuca and beyond.

Deepest thanks,

Kay Campbell, on behalf of Bob Campbell who died in March 2021

Campbell, Linda

Date: 8/9/25
Method: Website
Comment: See below.

Please choose Option 5 to remedy the toxic Rayonier site in Port Angeles. The only right & just way forward, after these many decades of inaction, is to rid this shoreline area of toxic material once & for all. Any other choice involves the future uncertainties of sea level rise, earthquakes, or tsunamis disrupting the "pile & cover" option. If this site were not along the shoreline, there could be other safe options, but the nearshore is a particularly dynamic & vulnerable area, with a salmon stream that has been & could be again, very productive. Clean up & restoration of Ennis Cr must be total. The dock pilings & cement pad must be removed & the natural shoreline restored. Once cleanup is complete, the site should be left in its original, pre-mill state & become accessible to the public, some of whom have already died waiting for appropriate action. Thank you.

Campbell, William

Date: 8/10/25
Method: Website
Comment: See below.

I support the permanent solution of Alternative SL-5 for contaminated soil and sediment at the former Rayonier Mill site in Port Angeles, WA. Proposed Alternative SL-3, leaving contaminated soil in place forever in a capped mound which will greatly limit future development, is unacceptable

---

Canepa, Shawn

Date: 8/12/25
Method: Website
Comment: See below.

As a concerned citizen and member of the Port Angeles community, I strongly urge the selection of Alternative SL5 for the cleanup of the former Rayonier mill site. This decision is critical to safeguarding the health of our community and the irreplaceable marine ecosystem along our waterfront.

The Port Angeles waterfront is a cornerstone of our region, supporting endangered Southern Resident killer whales, salmon, and migratory birds. The contamination at the mill site—PCBs, dioxin, and heavy metals—poses a severe and persistent threat to this fragile environment.

Alternative SL3, which relies on capping the site, is a shortsighted measure that fails to address the risks of sea-level rise, coastal erosion, earthquakes, or flooding. These could easily compromise the cap, releasing toxic pollutants back into our waters and endangering our ecosystem.

Alternative SL5, involving the complete removal of contaminated soil, is the only responsible, long-term solution. It ensures permanent protection for our community and environment, preventing future generations from inheriting this toxic legacy.

The benefits of SL5 are profound, far outweighing the understated risks and underestimated costs of SL3. A clean and safe waterfront is an invaluable asset that supports our health, economy, and way of life.

This issue matters deeply to me because the waterfront is where I walk with my family, where I find solace in nature, and where I hope future generations will thrive. Its beauty and biodiversity are treasures we cannot afford to lose.

For the sake of our community, our environment, and our future, I implore you to choose Alternative SL5.

Sincerely,
-Shawn

Caplow, Florence

Date: 8/12/25
Method: Website
Comment: See below.

I am writing in support of the City of Port Angeles request for a full cleanup of the site, SL-5. Rayonier benefited from releasing pollutants into the air, water, and sediments for 70 years; now it is time to give back to this bay and community and clean up the mess they left, thoroughly and completely, so that the land can be used again safely. We can't assume there will be funds for a cleanup in the future, if monitoring shows issues. Some of these chemicals will last for hundreds of years, and who will be monitoring then? We now have a major trail that goes along the edge of the site, and all of the waters within Ediz Hook are polluted. After wading in the water of the bay, I have been treated for what my dermatologist calls a "toxic burn." Yes, it's expensive to clean it up completely, but think of how much profit came from this site. I believe we - and more importantly, Rayonier - owes it to this community and to the water and soils it damaged, to clean it up completely for future generations of people, fish, and other animals.

Cardiff, Jeanine

Date: 7/25/25
Method: Email
Comment: See the following two pages.

From: Jeanine Cardiff <jeaninecardiff@gmail.com>
Sent: Friday, July 25, 2025 1:53 PM
To: Abbett, Marian L. (ECY) <MABB461@ECY.WA.GOV>
Subject: SL5 Is the Only Responsible Path Forward for Rayonier Cleanup

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To the Washington State Department of Ecology,

The following letter has been submitted by my colleague, Kelly Johnson. I support this clarity of statement for why SL5 is the only path forward, and why SL3 is not an acceptable solution:

- - - -

The time for half-measures is over. The Rayonier Mill site in Port Angeles has languished in a state of contamination and deferred accountability for decades. SL3 is not an acceptable solution—it's a temporary fix masquerading as progress.

At this week's special Port Angeles City Council meeting, residents, environmental experts, and community advocates spoke with remarkable unity: SL5 is the only viable path forward. SL3 proposes capping a contaminated 10-acre area, elevating the soil, fencing it off, and committing to thirty years of monitoring. This is containment—not remediation. Under SL3, development would be severely limited by physical constraints and long-term regulatory burdens, thwarting our Shoreline Master Plan and compromising public safety.

Moreover, it appears SL3's costs have been underestimated while SL5's have been inflated, downplaying its long-term value. SL5 would remove significantly more contaminated material and allow for unrestricted use of the land in alignment with modern urban planning standards and environmental justice goals.

Let's be honest about what's at stake. Although Rayonier is still zoned for heavy industrial use, our new Comprehensive Plan reimagines this waterfront as a vibrant mix of public space, recreation, commercial opportunity, clean industry, residential living, and ecological restoration. SL3 would strand this vision in bureaucratic purgatory. SL5, by contrast, opens the door to meaningful redevelopment—one that reflects the hopes and priorities of our community.

We urge the Department of Ecology to recognize the weight of this moment and reject SL3. Anything less than SL5 undermines environmental integrity and ignores the people of Port Angeles who are demanding a full and permanent cleanup.

Choose restoration. Choose accountability. Choose SL5.

- - - - -



Jeanine Cardiff

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213 E. 8th St. Suite B, Port Angeles

PROUDLY PARTNERED WITH CENTURY 21 REAL ESTATE CENTER

Carmean, Ingrid

Date: 8/10/25
Method: Website
Comment: See below.

Level 5 cleanup is the ONLY option that the Dept. of Ecology should consider for the former Rayonier Mill site in Port Angeles, WA.

Carpenter, Brenda

Date: 8/11/25
Method: Website
Comment: See below.

I support Option 5. I want the clean up of all toxic waste and complete remediation. For 30 years our community has dealt with the continued contamination of our harbor. Please don't let us down.

Carroll, Stefanie

Date: 8/10/25
Method: Website
Comment: See below.

Please consider SL5 as the only option for our community. Our waterfront deserves to be a destination for locals and tourists, and a source of recrea5and revenue. Don't sell us short!

Carson, Danielle

Date: 8/12/25
Method: Website
Comment: See below.

I support the permanent solution of Alternative SL-5 for contaminated soil and sediment at the former Rayonier Mill site in Port Angeles, WA. Proposed Alternative SL-3, leaving contaminated soil in place forever in a capped mound, will greatly limit future development. Temporary solutions such as this are a waste of resources because there will need to be additional cleanup in the future to make the area safe for mixed use development. Do it once, do it right! Our community deserves better. Thank you!

Casey, Rob

Date: 8/12/25
Method: Email
Comment: See below.

Hello,

I'm writing to show my support for Ecology to clean up the Rayonier Mill site at the mouth of Ennis Creek in Port Angeles, Wa.

Thank you.

Cheers. Rob Casey

Author, "Paddling the Salish Sea 80
Trips" Mountaineers Books.

Caskey, Annie

Date: 8/7/25
Method: Website
Comment: See below

I believe that the company that polluted the area needs to pay for the entire cleanup. What kind of world do we leave our children when we leave it only semi-safe? What kind of example do we set, to say that the poor corporation can't afford to take care of the mess they knowingly caused, increasing the risk to the next several generations' health, who reside here? This should be a no-brainer, clean it up to how it was "before" it was contaminated, partial cleanup is NOT acceptable!



Catastini, Jennifer and Claudia

Date: 8/5/25
Method: Website
Comment: See below.

The proposed clean up plan, while following regulations that Dept of Ecology must consider, is not a complete solution.

We believe our community is looking for a real, final solution.

One that is respectful of generations which will follow us and the challenges they will have due to climate changes.

We feel the proposed solution does not truly consider:

#1. An earthquake of magnitude 8-9, which will be followed by a tsunami.

This is NOT a situation of “IF an earthquake occurs”.

It is a situation of “WHEN an earthquake occurs.”

This is not conjecture.

There is current scientific data showing that a tsunami of significant size and volume will sweep over the area currently proposed as a depot for contaminated materials.

Consider the disaster that will be.

#2. The solution proposes a depot for contaminated materials “200 feet from the shoreline”.

It does not stipulate the elevation of this capped soil material.

The capped material certainly will be in reach of a tsunami, which will spread the soil throughout the area.

The capped material will also be at risk when future water levels are significantly elevated, due to continued climate change.

The cap itself has a high probability of being eroded due to water movement, and contaminated soils redispersed.

This is also not an “IF” but a “WHEN”, supported by scientific data regarding increased ocean elevation within the next 100 years.

3. Finally, Ennis Creek flows through the site.

If there is a significant change of water volume in the creek due to change in climate, the creek bed itself may wander and change course. This may also affect the capped material.

One can't predict the future wandering course of a stream, unless the stream is contained within a channel; even so --it can overflow the channel.

We are joining the Port Angeles City Council and many, many others in the community who want a complete solution.

This means removal of all contaminated soils from the site.

A real clean up; not a partial one!

Leaving contaminated soils on the site means an almost certain duplication of clean up efforts in the future.

Why do this?

We don't want to kick the can down the road for our children and grandchildren to face.

They will have enormous challenges, if not almost insurmountable ones.

We are in favor of Solution #5.

We strongly urge the Department of Ecology to consider that while a partial solution may appear to be “less expensive” it is, in fact, a choice that will require future efforts which will cost more.

Please advocate for Solution #5, and insist that Rayonnier clean the site completely!

Jennifer Catastini and Claudia Catastini

Cendejas-Zarelli, Sara

Date: 8/11/25
Method: Website
Comment: See below.

I strongly agree with the City of Port Angeles's support of the permanent cleanup of the Rayonier Mill Site and favor Alternative Five as opposed to Ecology's option #3. I feel strongly that leaving the site with remaining toxins would allow Rayonier to walk away without fully being held responsible for all of the pollution present at the site. Full cleanup will allow the highest level of flexibility for any future land uses at that location.

Chadd, Susan

Date: 8/11/25
Method: Email
Comment: See below.

I support the permanent solution of Alternative SL-5 for contaminated soil and sediment at the former Rayonier Mill site in Port Angeles, WA. Proposed Alternative SL-3, leaving contaminated soil in place forever in a capped mound which will greatly limit future development, is unacceptable.

Rayonier may have once provided jobs for this community, but the devastation to our waters and forests has been despicably destructive. The Mantooths, Darlene Schanfield and others have provided a mountain of evidence to help DOE make the right decision for this community and its natural resources. Our community has proven to be resourceful if given a fighting chance.

How in good conscious, can the DOE choose to bow to the avarice of the industry who profited from our community by stripping and contaminating our forests and waters, and due to their careless greed, have the only resources to bankroll a proper clean-up?

The compromise is no compromise. Make them take the fullest responsibility.

Susan Chadd (64 year resident)

1774 Little River Road
Port Angeles, WA 98363

Chiabotti, Dianna

Date: 8/9/25
Method: Website
Comment: See below.

I strongly encourage the Washington Department of Ecology to select only option 5. I completely agree with our city manager, Nathan West. Allowing for an option that is less thorough is harmful to our children and our local climate/ecology. Our children and families boat in this area, explore this area, and fish/crab in this area. I urge you to not allow Rayonier shirk their responsibility of providing a complete clean-up. Their actions created this harmful situation and full accountability is necessary since not doing so is a health and safety issue for the environment, and the animals and people that call this area home.

Christian, MD, Elizabeth

Date: 8/12/25
Method: Email
Comment: See below.

Please choose option PL5 for remedying the toxic problem at the site of the defunct Port Angeles Rayonier Mill .
Removal of the residual toxic mill wastes is the only satisfactory way to protect our community from their ill effects over the long term.

Removal of these waste materials will also enable re-establishment of the Ennis Creek estuary, which is a vital and foundational component of any Ennis Creek restoration plan. We await with eager longing to see restored runs of Salmon in that otherwise intact stream!!

Even as the contemporary community seeks restoration, our future generations, human and other than human depend on us to do the right thing.

PL5 is the right choice.

Elizabeth Christian MD

Christison, Megan

Date: 8/10/25
Method: Website
Comment: See below.

Dear Washington Department of Ecology,

I am writing as a concerned resident and community member to urge you to select Alternative SL-5 for the cleanup of the former Rayonier Mill site in Port Angeles.

Leaving contamination in place under a cap, as proposed in Alternative SL-3, is not an acceptable long-term solution for our waterfront. While capping may reduce short-term exposure, it does not remove the toxic materials from our community, and it places a permanent burden of monitoring, maintenance, and land-use restrictions on future generations.

SL-5 is the only option that truly protects public health, the environment, and the future of Port Angeles. By excavating and removing all contaminated soil for proper disposal in a licensed facility, SL-5 eliminates the risk of future leaching into Port Angeles Harbor, prevents cap failure or storm damage from re-exposing toxins, and ensures that our waterfront can be safely redeveloped for housing, parks, and businesses.

This site has been contaminated for decades, and our community has waited long enough for a permanent solution. Anything short of complete cleanup will leave us with a toxic legacy and limit the economic and recreational potential of this unique waterfront location.

I urge the Department of Ecology to listen to the City of Port Angeles, local leaders, and residents by choosing SL-5—not as an interim measure, but as the final, comprehensive cleanup our community deserves.

Thank you for your consideration.

Sincerely,

Megan Christison
Port Angeles, WA

Christoffel, Ronald

Date: 7/31/25
Method: Website
Comment: See below.

I request the SL-5 full cleanup plan for the Rayonier Mill - any other plan besides full cleanup risks venture leeching of the toxic materials.

Churchill, Lauren

Date: 8/10/25
Method: Website
Comment: See below.

I am writing to express my opinion that the level 5 clean up of the Rayonier Mill site must proceed as planned. In fact it is the only plan that should be followed for the reasons that it is the only way the site can actually be cleaned up in perpetuity. A level 3 clean up, for instance would only partially remove the toxic material. If that happens they may as well continue to keep the area off limits. The site was razed 30 years ago, and we are still arguing over how much to clean up. It is kind of ridiculous.

Sincerely, Lauren Churchill

Clallam County Board of Commissioners

Date: 7/29/25
Method: Email
Comment: See the following two pages.

Board of Clallam County Commissioners

223 East 4th Street, Suite 4
Port Angeles, WA 98362-3015
360.417.2233 Fax: 360.417.2493
Email: commissioners@clallamcountywa.gov

MIKE FRENCH, District 3, Chair
RANDY JOHNSON, District 2
MARK OZIAS, District 1

TODD MIELKE, County Administrator

July 29, 2025

Marian Abbett, Site Manager
WA Department of Ecology
P O Box 47775
Olympia, WA 98504-7775

Re: Port Angeles Rayonier Mill Public Comment

Marian Abbett:

First, we want to thank you for your outreach to the public on this very important subject to our community. The following comments from the County Commissioners relate to Ecology's proposed interim action clean-up program for the Rayonier site.

We totally agree with your statement in this plan that "Rayonier must clean it up to the highest safety standards called unrestricted land use levels. This would allow for a variety of future uses." Unfortunately, your preferred plan SL-3 does not meet this goal. A five to seven-foot cap over ten acres of contaminated soil will preclude some future uses of the site and/or require the removal of the cap. We also believe that the estimated cost for this alternative is undervalued, and in addition, this alternative is more complex than our preferred alternative. Although more costly, we believe the alternative SL-5 with the removal of all the contaminated soil to a safe site is the only alternative that meets your above-mentioned goal. This alternative will provide the greatest benefit and is the only permanent environmental remedy for the Rayonier site. The cost/benefit ratio might have been skewed simply due to underestimation of the costs in SL-3 which and although more costly, the greatest benefit will always be the removal of the contaminated soil from this site under option SL-5.

A second issue is that the estimate of a seven-to-ten-year time horizon to clean up the site gives us concern. The fact that it has taken decades to even reach the current state of clean-up causes us to question the certainty of this forecast. A shorter required time to reach a satisfactory clean-up will allow the development of the site into the appropriate future use. Time does matter.

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Since the proposed clean-up process will take years under any scenario, we also believe that there should be priority given to Ennis Creek, its estuary, and the riparian areas around the stream. The salmon and steelhead need help immediately, and we believe this should be the FIRST priority for cleanup---restore Ennis Creek for all riparian dependent species as rapidly as possible.

Finally, we also ask that Ecology continue to communicate closely with Rayonier (RYAM) given their recent corporate financial record. This will take close coordination with all parties to ensure that this project is completed in an expeditious manner.
Again, thank you for reaching out to all of us.

Sincerely,

BOARD OF CLALLAM COUNTY COMMISSIONERS

Mike French, Chair | Randy Johnson | Mark Ozias

J:\public\Correspondence\from BOCC\2025\Department of Ecology Rayonier Mill 7-29-25.docx

Clark-Getzin, Wendy

Date: 8/12/25
Method: Website
Comment: See below.

Solution #5 is the only viable solution to the polluted site. DOE needs to not preclude any remediation actions that would keep the site from salmon restoration and redevelopment occurring concurrently and within my lifetime.

Collins, Bradley

Date: 8/11/25
Method: Email
Comment: See below.

I object to the WA Dept of Ecology proposed draft Interim Action Plan for many reasons as follows:

1) An Interim Action Plan is not a Final Remedial Action Plan required by Washington law under the Model Toxics Control Act.

2) The proposed final cleanup actions are likely to cause significant environmental harm by leaving 128,000 cubic yards of contaminated soil and sediment on a 10 acre portion of the upland area of the Rayonier Mill Site in Port Angeles, WA.

3) The Rayonier Mill cleanup site is culturally, historically, and environmentally important to the greater Port Angeles community and must be cleaned up to the highest safety standards for unrestricted land uses.

4) This siete was a significant Klallam village, a major portion of the City of Port Angeles tax base, and an environmentally sensitive area due to the Olympic Discovery Trail (a major public recreation use), Ennis Creek (a salmon rearing stream), and Port Angeles Harbor shoreline. The 10 acre hazardous waste dump covered by a 2 foot protective cap bordered by the Tail, Creek, and Shoreline is the absolute worst placement for a perpetual hazardous waste dump.

5) After many years of study and evaluation of cleanup options (28 years since the Rayonier Mill closed down in 1997), Ecology proposes a Level 3 cleanup as the final cleanup action instead of a Level 5 clean up as required by MCTA - an abject failure for which the Department of Ecology is ashamed.

6) Most agency and general public comments oppose this the retention of hazardous waste in place limiting how the land in the capped area can be used for any other purpose

than protecting the public from the contamination from being released again - these opposing agency and public comments demand a Level 5 cleanup.

My perspective in making these comments is from my nearly 50 years as a professional urban planner, including 26 years as a SEPA Responsible Official for the Cities of Tukwila, Port Angeles, Arlington, and Sultan.

The Rayonier Mill hazardous waste site cleanup has been the most inept environmental protection effort by public officials that I have witnessed firsthand since 1997.

Bradley J. Collins FAICP
August 11, 2025

Conklin, Neil

Date: 8/12/25
Method: Website
Comment: See below.

I am writing you today asking you to reconsider your Disproportionate Cost Analysis with consideration of the following:

1. Future Use - Clean-up Goals to include rezoning to residential housing.

'Include any planned future uses of the site and any habitat restoration or rescue recovery for the site' (WAC 173-340-351(6)(a))

2. Permanent Solution

'A permanent solution is defined as one in which cleanup standards can be met without further action being required at the site'n (WAC 173-340-200)

3. The resilience of Alternative S-3 to climate change impacts.

'The ability to resist and recover from climate change impacts should be considered explicitly and documented.' (WAC 173-340-360 (5)(d)(iii)(A)(III) and 173-340-351 (6) (f) (vii)

If the MTCA rule requires cleanup actions to "use permanent solutions to the maximum extent practicable", Alternative S-5 should be the only feasible and cost effective method to restore the ecology of this important cultural and economic resource with urgency.

Thank-you kindly,

Neil Conklin

Copass, Lucy

Date: 8/10/25
Method: Website
Comment: See below.

I am writing in regard to the Final Plan issued by the Department of Ecology in regard to clean-up of the former Rayonier mill site in and near the Port Angeles harbor.

I respect the time and effort DOE staff put into development and evaluation of an array of potential clean-up plans for the site. I also appreciate DOE's past programs and processes to inform the public and gather their input.

However, I disagree mightily with the final choice of SL-3. My reasons:

- The site, both in the inter-tidal and upland areas, has been shown to have a long list of extremely serious contaminants, all well above levels known to threaten human health and/or aquatic life. A plan for Rayonier to cap and monitor contaminated sediments and then all of us just “hope for the best' will not suffice.

- Choosing a less-expensive alternative may fit the pre-established criteria for making a selection but if the more “practical” plan proves to be a comprise that fails to hold up to coastal conditions of the future, then that's no savings at all.

As a concerned citizen, I join many others plus local leaders in government and business in asking Ecology to serve as the environmental protector it was created to be by adopting a plan (SL-5) that includes total removal of contaminated soils from the site, and requires Rayonier to make good on its responsibilities to people and wildlife who visit and use the site in the future. Restoration of the salmon-protective estuary that once existed at the outfall of Ennis Creek would certainly be a part of this responsibility.

I have been inspired when reading recent news coverage about Ecology's decisive actions in regard to a contaminated mill site in Southwest Washington. These include bringing legal action against the current owner when he failed to comply. Although there are sure to be explanations for the differences, the sharp contrast between that case and the 20 years of delay and indecision that have characterized clean-up efforts for the Port Angeles site is striking. I feel certain that, with sufficient determination and consideration of new information about the Port Angeles site that has been gathered and submitted to Ecology in recent weeks a better outcome can be achieved for this beautiful and ecologically-important place.

Costantino, Lisa

Date: 8/12/25
Method: Website
Comment: See below.

We have recently become aware that Rayonier is responsible for the hiring of consultants who estimate the costs of preferred solutions and is overseen by the Department of Ecology (also known as the DOE).

I believe DOE to be negligent in their oversight of costs and benefits estimates.

The DOE informed us that SL3 had to be the choice because the cost-benefit ratio was too high, and this was “the law,” an RCW over which they had no control. The fact that the estimated costs have been minimized in SL3 and exaggerated in SL5 results in a differential of $27 million, which forces SL3 to be the preferred solution by the letter of the law.

After further examination of the cost estimates of SL3, several areas are underestimated and incomplete, for instance, permitting, design and modeling, maintenance, repairs, and monitoring (to be done by Rayonier), plus coordination with sediment work and potential toxicity of untested sediments beneath the current dock as well as unknown protocols necessary for that remediation.

The benefits have been estimated too high and the costs too low for SL3.

How much will it cost when there is damage to the 10-acre capped toxic soil along the waterfront?

There's no modeling for loss of taxes, economic benefits, acts of God, along with sea level rise in these estimates.

SL-5 estimates are higher than expected. Engineering is not as complex, economy of scale, erroneous $75,000 restrictive covenant preparation cost included (which should not be there), and non-construction cost of $6.25 million higher than for SL3, which seems inaccurate as well.

For the benefit of Rayonier, future generations, and the restoration of the estuary and creek, the cleanup should be permanent. SL5 is permanent and allows property reuse.

How is it possible that in these cost-benefit ratio estimates, there's no financial accounting for the fish, salmonids, and the estuary that is no longer available to them, yet essential to their survival?

SL3 is much more complex. It involves fencing, signs to limit access, 30 years of post-construction monitoring, an environmental covenant, and a commitment to maintenance by Rayonier.

It should be easy to build, yet SL5 is underscored at 6, as excavation, loading, and transfer are well-known technologies.

On the other hand, SL3 has been over-scored at 9 with complex engineering for erosion-proof 7-foot (possibly more, depending on sediment findings) fenced 10-acre mound, considering sea level change, inclement weather, and an environmental covenant are the factors NOT being considered in this over-scoring of SL3.

Compliance with the Comprehensive Plan is not considered in estimates.

We need a PERMANENT, resilient solution and consideration of modeling and repair challenges to design, construct, and maintain the consolidation area. The cost estimate must recognize that SL3 is more complex and will cost more than SL5 to design and maintain.

These discrepancies and oversights make it clear that SL5 is the actual correct choice of preferred solutions.

We request that SL5 be the preferred and permanent solution to this long-delayed toxic cleanup.

We request that you do the right thing for the community, the ecosystem, and the future.

Crane, Cheryl

Date: 8/10/25
Method: Website
Comment: See below.

As a resident of Port Angeles, I live with my family less than a mile from the old Rayonier mill site. This community has waited long enough for the company to remediate the site to allow anything less than a full clean up. I support the city council, the county, the tribal council, and the other residents of Port Angeles who demand that Rayonier take full responsibility for destroying the ground and water and to clean the site in a way that will protect the residents of the area for generations to come.

Cross, Chelsy

Date: 7/8/25
Method: Other
Comment: See the following two pages.

DEPARTMENT OF ECOLOGY
State of Washington

Please Write Clearly or Go Online:
go.ecology.wa.gov/comment2270

Public Comment Form

1 Comment | 2 Review | 3 Your Copy

Commenting open: **June 12, 2025 8:00 AM PT—August 12, 2025 11:59 PM PT.**

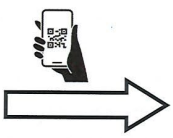
Port Angeles Rayonier Mill: Consent Decree, Draft Interim Action Plan, and SEPA Checklist & Determination of Non-significance

Please note that this comment form is for the purpose of submitting a comment to the Washington Department of Ecology. Commenter contact information is optional. Contact information is necessary if you want to receive future notices or responses related to this topic.

We would like your input on the following documents:

- **Consent Decree** – To move the cleanup forward, Ecology will enter into a legal agreement called a consent decree with the parties responsible for cleanup—Rayonier A.M. Properties LLC and Rayonier Advanced Materials (collectively referred to as "RAMP" or "Rayonier"). The consent decree is a legal agreement that would require RAMP to carry out Ecology's Interim Action Plan.
- **Draft Interim Action Plan** – Ecology's proposal of how to clean up the study area. It includes a schedule and cleanup requirements.
- **State Environmental Policy Act (SEPA) Determination of Non-Significance** – Based on an environmental checklist, Ecology has determined that the proposed cleanup is not likely to result in significant environmental impacts.

Scan the QR code to learn more about the cleanup or review documents.



Contact Information

All fields are optional unless otherwise indicated.

Submitted by: (Check one and write name)

- [x] Individual (add name below)
- [ ] Organization: _____
- [ ] Agency: _____
- [ ] Other _____
- [ ] Business: _____

First Name: Chelsy

Last Name: Cross

Address: 22 S. Ridge View Dr

City/Town: Port Angeles

Country: USA

State/Province: WA

ZIP: 98362

Email: chelsy.cross@gmail.com

Please write comment clearly on other side:

DEPARTMENT OF ECOLOGY
State of Washington

Please Write Clearly or Go Online:
go.ecology.wa.gov/comment2270

Public Comment Form

1 Comment | 2 Review | 3 Your Copy

Your Comment

Comments are due by August 12, 2025 at 11:59 p.m.
To make a comment, please enter your comment(s) in the text area. To submit attachments please visit Ecology's online comment form at https://go.ecology.wa.gov/comment2270.

Any information (e.g., personal or contact) you provide on this comment form or in an attachment may be publicly disclosed and posted on the Internet.

To submit comments for a group please visit our "Commenting Tips" webpage at https://ecology.wa.gov/About-us/Get-involved/Public-input-events/Commenting-tips

Next Steps: After the close of the comment period, Ecology will review and consider all comments received as we finalize the documents and respond accordingly.

I would like this site cleaned up to healthy modern standards where the land could be used for parks, housing or other community use.

I hope to see the easment, right-of-way, maintained for the users of the ODT

DEPARTMENT OF ECOLOGY
State of Washington

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

Accessibility: https://ecology.wa.gov/About-us/Accountability-transparency/Our-website/Accessibility

Ecology's online comment form is powered by SmartComment Software
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Cross, Cyndi

Date: 8/12/25
Method: Website
Comment: See below.

I am writing to support Level 5 cleanup of the former Rayonier Mill site in Port Angeles, This is an action that will have long lasting effects on the health and safety of our environment for future generations. We need a proper clean up so we can use this property for future homes, parks or tourism ventures that can revitalize our town. I am also concerned about the Olympic Discovery RAIL Trail access during this work. This is more than a recreational path, it is a commuter route and a tourism draw. I hope to see accommodations made for proper detours or access created during this work around as well as improvements made to the trail that is currently rutted along this section.

if capping could be done in a manner where the property could be safe to build and for fish and wildlife, that sounded good at a glance in the presentation but reality is, a full cleanup would be best for our future on this beautiful waterfront located at the gateway of Olympic National Park. So much potential here.

Sincerely,

Cyndi Cross

Curry, Rhonda

Date: 8/11/25
Method: Website
Comment: See below.

I submit the following as my position, please:

• Support the Port Angeles City Council decision supporting Option 5.

• Tell Ecology to factor into its cleanup cost analysis all impacts to fish, wildlife, the environment and human health.

• Support a full cleanup, not a coverup of soils and sediments. Remove all contaminated soils and sediments.

• Oppose leaving contaminated soils and sediment; then having to monitor them for 30 years.

• Support short- and long-term protection of the environment and public health; not a cheaper cleanup cost for Rayonier

• Remove all soils from the remaining concrete pad built hundreds of feet over the Harbor on fill that once held Rayonier's pulp mill

• Do not pile onto the concrete pad toxic sediments or wharf infrastructure; send these to appropriate hazardous waste landfills.

• Remove the concrete pad and restore the original shoreline now under the foundation

• As soon as possible relieve remove that dock pilings covered with creosote that is harmful to fish and other marine life.

• Ensure Ennis Creek is restored to its original shape and given space to continue the movement essential for a salmon stream

• Restore the brackish water zone at the mouth of Ennis Creek for the salmon

• Support returning this area to its natural state to attract wildlife and connect it with the wildlife corridor to the east towards Sequim and Jefferson County.

• Ensure the Natural Resource Damage Assessment parties complete their work for cleaning up and providing other restoration for federal resources contaminated by the Rayonier Pulp Mill. The decision makers are NOAA, USFWS, the Klallam Tribes and WA State Ecology

• Support solid and high fencing surround the upland polluted area along with large signs that fully inform the public of the cleanup and the importance of staying off the site.

• Keep the public updated as the cleanup moves forward.

Danks, Lois

Date: 8/10/25
Method: Email
Comment: See below.

I firmly support the permanent solution of Alternative SL-5 for contaminated soil and sediment at the former Rayonier Mill site in Port Angeles, WA. Proposed Alternative SL-3, leaving contaminated soil in place forever in a capped mound which will greatly limit future development, is unacceptable.

I've lived in Port Angeles for 42 years and remember the closing of the mill and the promises to clean up the site! These promises were delayed and stalled and never kept! Those responsible for the pollution MUST be held accountable for the harm to our waterfront. The area is part of a city plan to increase to livability of our town and make more of the waterfront accessible to all of us.

We put up with years of air pollution and water pollution and now it must be cleaned!!!

Sincerely,

Lois F. W. Danks
1621 South F Street
Port Angeles, WA 98363
360-808-3196

Darragh, Peter

Date: 8/7/25
Method: Email
Comment: See below.

To Whom It May Concern,

I am writing to strongly oppose the Washington Department of Ecology's proposed "cleanup" plan for the former Rayonier mill site in Port Angeles. The current plan—to pile up toxic waste over 10 acres along the Discovery Trail, cover it with a cap, surround it with a chain-link fence, and declare the job done—is wholly unacceptable.

This is not cleanup. It is containment, and it leaves future generations to deal with a hazardous legacy. The toxins at this site threaten our community's health, our environment, and our economy. Simply capping and fencing the waste will not prevent long-term contamination of the soil, groundwater, or marine waters of Port Angeles Harbor.

The Rayonier company is a profitable corporation and has the financial capacity to fund a complete cleanup. The Department of Ecology's claim that it cannot require full removal due to a "cost-benefit" provision in state law (RCW) is unacceptable. Public health, environmental integrity, and the future of this beautiful waterfront area must outweigh short-term cost calculations.

The Discovery Trail is a beloved public asset, drawing visitors from around the region and beyond. Placing a fenced toxic waste site directly alongside it will harm tourism, diminish our community's reputation, and send a message that industry can pollute without full accountability.

I urge the Department of Ecology to reject the current plan and require a full removal of contaminated materials from the site. We have one chance to restore this waterfront properly. Let's not settle for a temporary, unsafe, and unsightly solution that compromises our community's future.

Respectfully

Peter Darragh

Darst, Robert

Date: 7/24/25
Method: Website
Comment: See below.

THE ONLY CLEAN UP OPTION IS S L5 anything else is a non starter

---

Davis, Christine

Date: 8/8/25
Method: Website
Comment: See below.

I am writing to support Level 5 cleanup of the former Rayonier Mill site in Port Angeles, WA.

Level 5 cleanup is the ONLY option that the Dept. of Ecology should consider for the former Rayonier Mill site in Port Angeles, WA.

Demers, Tara

Date: 8/7/25
Method: Website
Comment: See below.

Dear DOE,

Please select Option 5 regarding the Rayonier Mill cleanup in Port Angeles, WA. There needs to be a FULL cleanup, not a partial one. ALL contaminated soils and sediments need to be removed, and whatever the cost is, Rayonier is liable for this environmental disaster of their own making. It's disgusting and ridiculous that it's taken this long for the FULL cleanup work to be done. Please remove the concrete pad, remove the dock pilings, restore the shoreline, and protect wildlife. Do not allow any rebuilding on the site so the area can go back to its vegetative state.

Thank you, Tara Demers

Dexter, Robert

Date: 7/30/25
Method: Email
Comment: See below and the following four pages.

From: Robert Dexter rndexter98@gmail.com
Sent: Wednesday, July 30, 2025 8:11 AM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Subject: Public Comment Submission – Port Angeles Rayonier Mill Study Area Cleanup

Ms. Abbett,

Thank you for this opportunity to comment on the proposed cleanup of the Rayonier Mill.

1. The soil cleanup is inadequate in leaving large quantities of contaminated soil on site to pose potential releases of contamination under a number of scenarios including eathquake, tsunami, and sea-level rise. In addition, hindering any future use of such a large area adjacent to the shore is inappropriate and cleanly economically stupid.

2. The cleanup of the offshore areas is replete with “to be determined.” This creates the likelihood of further delays and controversies. It was also not clear how stable the ENR/capping will be under extreme conditions, again such as a tsunami.

3. The proposed cleanup, or rather lack there of, of the Ennis Creek watershed, based on limited sampling that claimed no site-related contamination flies in the face of an earlier Ecology study (attached) that showed stack emissions from the mill caused substantial dioxin contamination in many areas of Port Angeles. It seems highly likely that the contamination along Ennis Creek is site-related and must be addressed.

Thanks,
Bob



DEPARTMENT OF ECOLOGY
State of Washington

Rayonier Mill Off-Property Soil Dioxin Study

Toxics Cleanup Program — July 2011

Draft Report Available for Public Review and Comment

In 2008, Department of Ecology analyzed one soil sample from 83 different locations near and downwind of the Rayonier Mill property. The purpose of this sampling is to help determine:

- The concentration of dioxins and furans (referred to as dioxins in this fact sheet) in surface soils that might have been impacted by air emissions from the Rayonier Mill, and
- The former Rayonier Mill's contribution to measured dioxin contamination, compared to other possible sources.

Ecology released data in February of 2009 and now has further evaluation of the study. The draft report is ready for public review at the locations listed in the box on the right. Please submit comments by August 30, 2011.

Study Conclusions

Chemical and spatial patterns in the data indicate that the former Rayonier Mill was one source of dioxins. Other sources also contributed to the dioxins found in this study. Ecology did not design this study to determine the boundaries of Rayonier's responsibility or assess human health risk. Instead, it identifies areas of concern and potential sources. Under state cleanup law, Rayonier must address its off-property dioxin contamination.

Figure 1 compares the data to a level of 11.1 parts per trillion (ppt) TEQ.* This is the "Method B" direct contact value for protection of human health. Above 11.1 ppt, there is greater than a one-in-a-million additional cancer risk, depending on type and length of exposure. Forty samples had above 11.1 ppt TEQ.

Figure 1. Soil dioxin concentrations in parts per trillion (ppt) TEQ*

*TEQ is a measure of the toxicity of a dioxin mixture. For more on TEQs, see the Reading Guide, available online and at the locations listed to the right.

Publication Number: 11-09-090

Please reuse and recycle

Comments Accepted
July 14—August 30, 2011

Submit Comments and Questions to:
Connie Groven, Project Manager
WA Department of Ecology
Toxics Cleanup Program, SWRO
P.O. Box 47775
Olympia, WA 98504-7775
Phone: (360) 407-6254
E-mail: Connie.Groven@ecy.wa.gov

Public involvement contact:
Hannah Anyagi
Phone: (360) 407-6790
E-mail: Hannah.Anyagi@ecy.wa.gov

DOCUMENT REVIEW LOCATIONS

Port Angeles Public Library
2210 South Peabody Street
Port Angeles, WA 98362
Phone: (360) 417-8500

Peninsula College
1502 E. Lauridsen Blvd.
Port Angeles, WA 98362
Phone: (360) 417-6280

WA Department of Ecology
Southwest Regional Office
300 Desmond Drive SE
Lacey, WA 98503
By appointment only:
Contact Debbie Nelson,
Debbie.Nelson@ecy.wa.gov or
(360) 407-6365

Ecology's Toxics Cleanup website
http://www.ecy.wa.gov/programs/tcp/sites_brochure/rayonierOffProp/rayonierOffPr_hp.htm

DEPARTMENT OF ECOLOGY
State of Washington

Rayonier Mill Off-Property Soil Dioxin Study

Toxics Cleanup Program — **July 2011**

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- The concentration of dioxins and furans (referred to as dioxins in this fact sheet) in surface soils that might have been impacted by air emissions from the Rayonier Mill; and
- The former Rayonier Mill's contribution to measured dioxin contamination, compared to other possible sources.

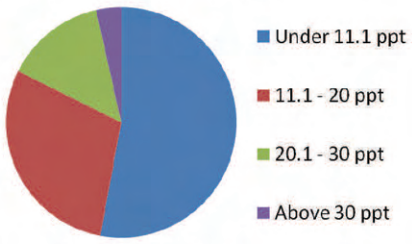
Ecology released data in February of 2009 and now has further evaluation of the study. The draft report is ready for public review at the locations listed in the box on the right. Please submit comments by August 30, 2011.

Study Conclusions

Chemical and spatial patterns in the data indicate that the former Rayonier Mill was one source of dioxins. Other sources also contributed to the dioxins found in this study. Ecology did not design this study to determine the boundaries of Rayonier's responsibility or assess human health risk. Instead, it identifies areas of concern and potential sources. Under state cleanup law, Rayonier must address its off-property dioxin contamination.

Figure 1 compares the data to a level of 11.1 parts per trillion (ppt) TEQ.* This is the "Method B" direct contact value for protection of human health. Above 11.1 ppt, there is greater than a one-in-a-million additional cancer risk, depending on type and length of exposure. Forty samples had above 11.1 ppt TEQ.

Figure 1. Soil dioxin concentrations in parts per trillion (ppt) TEQ*



**TEQ is a measure of the toxicity of a dioxin mixture. For more on TEQs, see the Reading Guide, available online and at the locations listed to the right.*

Comments Accepted

July 14—August 30, 2011

Submit Comments and Questions to:

Connie Groven, Project Manager
WA Department of Ecology
Toxics Cleanup Program, SWRO
P.O. Box 47775
Olympia, WA 98504-7775
Phone: (360) 407-6254
E-mail: Connie.Groven@ecy.wa.gov

Public involvement contact:

Hannah Aoyagi
Phone: (360) 407-6790
E-mail: Hannah.Aoyagi@ecy.wa.gov

DOCUMENT REVIEW LOCATIONS

Port Angeles Public Library
2210 South Peabody Street
Port Angeles, WA 98362
Phone: (360) 417-8500

Peninsula College
1502 E. Lauridsen Blvd.
Port Angeles, WA 98362
Phone: (360) 417-6280

WA Department of Ecology Southwest Regional Office
300 Desmond Drive SE
Lacey, WA 98503
By appointment only:
Contact Debbie Nelson, Debbie.Nelson@ecy.wa.gov or (360) 407-6365

Ecology's Toxics Cleanup website
http://www.ecy.wa.gov/programs/tcp/sites_brochure/rayonierOffProp/rayonierOffPr_hp.htm

Publication Number: 11-09-090

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Ecology's Next Steps

Ecology will respond to questions at the end of the comment period and address general public concerns in a responsiveness summary. The responsiveness summary will be available at locations listed on page one.

Ecology has shared these results with Rayonier and will ask the company to address dioxins outside of its property. Ecology will work with Rayonier on a legal agreement and a plan for the next steps.

Study Findings

For a detailed summary of the report, see the Reading Guide (locations listed on page one).

Chemical patterns: There are many different types of dioxins and related furans. Different sources have certain proportions of dioxins and furans. The lab looked at the 17 dioxins and furans that are considered most toxic. The study looked at possible sources by analyzing for certain patterns. This is a complex process because samples rarely have dioxins from only one source.

All of the samples had one or more of three patterns (Figure 2). Each of these patterns may represent a single source or a mix of different sources.

Sources of dioxins: The next step was to see if these patterns matched any known sources of dioxins. Ecology gathered data on many different known dioxin sources, including hog fuel boilers that burned saltwater laden wood to fuel pulp mills.

The source three pattern (Figure 2) closely matches a hog fuel boiler source. There were several hog fuel boilers in Port Angeles, including the Rayonier Mill. Source one is a profile similar to tire burning or possibly a certain pesticide. Source two matches other urban soils and some hog fuel boilers, and may be a mix of sources.

Magnitude: The dioxin levels found in Port Angeles appear higher than in typical urban areas, based on available data. However, when source three dioxins are removed, the overall levels look more like a typical urban area.

Spatial patterns: Total dioxins from all three sources do not follow a spatial trend. However, each of the three sources looks distinct when mapped out separately. Higher concentrations of source one are mainly found on a few scattered properties. Source two is more uniform across the area investigated. Source three is highest closer to the Rayonier Mill (Figure 3).

Mass balance: Ecology also did a rough calculation and found that Rayonier's past emissions *could* account for the levels of source three dioxins seen in soil within the area investigated. This does not rule out other sources that could have contributed to source three dioxins.

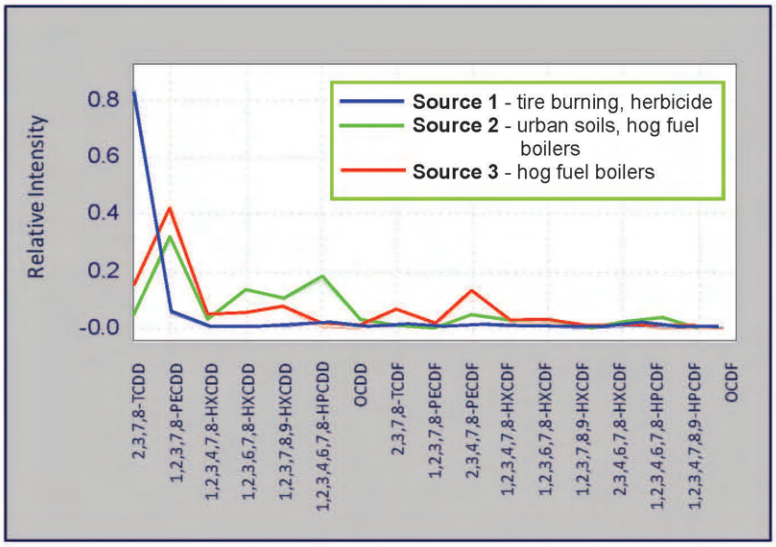


Figure 2. Dioxin patterns found in Port Angeles soils shown as fractions of TEQ

Keep In Mind...

- Dioxins are unintentional byproducts of human activities and natural processes. They do not break down easily in the environment and, as a result, are found everywhere.
- A single sample cannot be used to say whether a property is contaminated or not. Dioxin levels can vary widely, even within a single property. Other parts of a property may not have the same results.
- A single sample cannot predict if there is a health risk on a property. Samples were taken from the least disturbed part of each property in the study, which may not be an area where people are exposed.

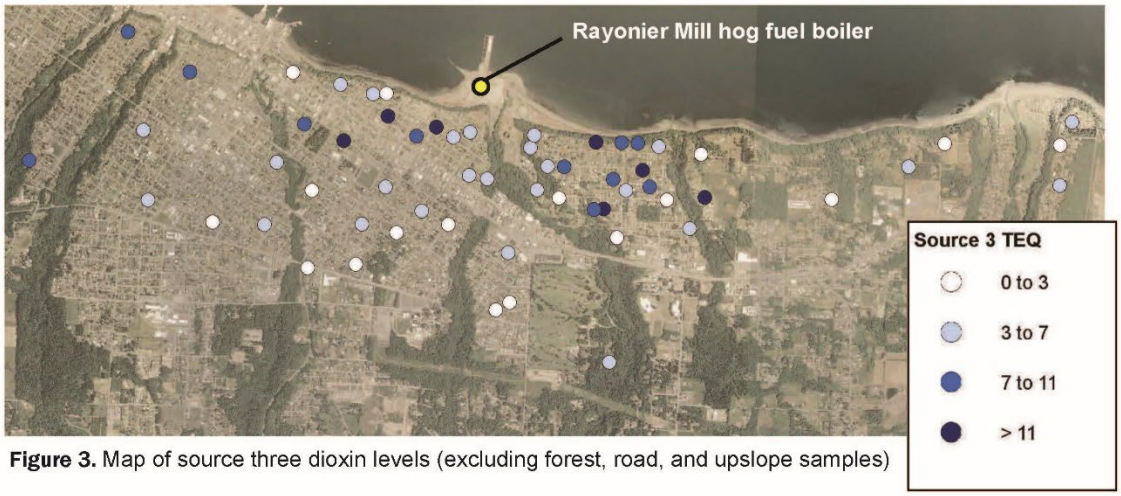


Figure 3. Map of source three dioxin levels (excluding forest, road, and upslope samples)



Healthy Actions

If you or members of your household are concerned, you can reduce exposure to potentially contaminated soil by:

- Washing your hands after working or playing outside, and before eating.
- Scrubbing fruits and vegetables from the garden.
- Vacuuming regularly and dusting with a damp cloth.
- Keeping children's toys clean.

Also, dioxins from air emissions tend to stay in the upper layer of soil until they are disturbed. Landscaping and development can dilute these dioxins, while grass and other ground cover can help prevent exposure.

DEPARTMENT OF
ECOLOGY
State of Washington
PO Box 47775
Olympia, WA 98504-7775

Rayonier Mill Off-Property Soil Dioxin Study
Clallam County, WA

Study Results Available

Public Comment Period:
July 14-August 30, 2011

If you need this publication in an alternative format, call reception at (360) 407-6300. Persons with hearing loss, call 711 for Washington Relay Service. Persons with speech disability call 877-833-6341.

Technical Workshop & Public Open House

August 3, 2011
Port Angeles Senior Center
728 E. 7th Street, Port Angeles, 360-457-7004

Technical Workshop, Craft Room 3:00—5:00 p.m.
Presentation and discussion with Greg Glass about the analysis and conclusions of this study. **This event is also open to the public.**

Open House, Multi-purpose Room 6:30—8:30 p.m.

6:30—7:00 p.m.	Open House session
7:00—8:00 p.m.	Presentation on the results of the study and Ecology's next steps Question & answer
8:00—8:30 p.m.	Open House session

Publication Number: 11-09-090

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DiMarchi, John

Date: 8/6/25
Method: Website
Comment: See below.

We support a "full" cleanup of the Rayonier mill site. We support removal of all contaminated material. We do not support burying/covering contaminated material and leaving it onsite. For the long-term we support the complete removal of waste to avoid as much long-term monitoring and the potential of additional impacts long into the future. In my mind the only argument for covering/burying waste in place at site is to save money but this is trumped by the possibility of long-term impacts (even far into the future). We want Ennis Creek to be clean and a viable salmon stream for the long-term.

DiMartino, Terri

Date: 7/25/25
Method: Website
Comment: See below.

The abandon Rayonier Mill is the worst blight in Port Angeles, Washington. The Department of Ecology should be ashamed of themselves for letting this toxic albatross simmer for over 30 years. Clean it up now. No more studying it. Rayonier owes billions of dollars to the city of Port Angeles for the impact it has had on letting this valuable property rot. This site reminds me of the Salton Sea in Southern California. Do your job and force Rayonier to remove all contaminates.

DiMartino, Terri

Date: 8/11/25
Method: Email
Comment: See below.

Dear Mr. Sixkiller,

I am a granddaughter of a World War II Army veteran and University of Washington graduate. My grandfather fought aboard to protect our American freedoms. I am writing you because I believe Rayonier Industries has created a toxic mess in Port Angeles and refuses to acknowledge any responsibility to make things right. The property is fenced off and it's an eyesore to look at for those that walk, bike and enjoy the water views. Personally, this feels like a deliberate environmental attack. There are no salmon living in Ennis Creek. Where is the stewardship to protect the salmon? Rayonier has abandoned the

salmon and people of Clallam County. This property continues to damage Washington's most beautiful, yet poorest counties in the state.

I know you have many priorities, but would consider making the Port Angeles Rayonier Industries toxic property your number one? The current and future generations citizens of Port Angeles, the salmon and Salish Sea desperately need your leadership to correct this mess. I have been aware of this environmental problem since the 1980's.

Any help you can lend to my requests would be greatly appreciated.

Thank you for your time and considering my plea for help.

Respectfully,

Terri DiMartino
Sequim, Washington

Dobson, Teri

Date: 8/10/25
Method: Website
Comment: See below.

Please move forward to adopt SL5, not SL3.

SL3 proposes covering and fencing off the area for 30 years!

Development under those conditions would be legally and physically constrained and would hinder our Shoreline Master Plan.

This is a highly valuable area of our waterfront in Port Angeles. Don't let it remain a brownfield for yet another 30 years.

Doherty, Mike

Date: 8/12/25
Method: Website
Comment: See below.

I was raised, educated and employed in Port Angeles. After service in the US Navy, I returned to Port Angeles and enrolled at Peninsula College. While attending Peninsula, I worked full time at the Rayonier mill, primarily “grave yard” shifts. On numerous occasions I worked “overtime” which periodically involved “cleaning boilers”, where one worked in the inside of the boiler, in over 100 degree temps, breathing without protection… It was good money for a college student. But in subsequent adult years you often wondered what

the chemical makeup was of the air you had been breathing, without any warnings. Several of the mill jobs involved health and safety risks.

Rayonier was very profitable through most of its operational years.

When the Rayonier mill finally closed, local employment suffered dramatically and lasted for many years. Retraining programs were offered, but real success was marginal.

The clean-up of the former mill site has been prolonged at the convenience of Rayonier. I believe that it is long past the appropriate time for the Rayonier Corporation, and successor owners, to be required to perform a complete cleanup at the site. As I listened to the discussions in our City Council meetings, I found myself supporting the concept summarized by the statement "require a cleanup, not a coverup". From what I have learned in the several discussions over recent years, for the quantities of material to be removed for treatment, barge transport would be most efficient and in the best interests of public health.

Thank you for the opportunity to make public comment.

Doherty, Paula

Date: 8/10/25
Method: Website
Comment: See below.

I am writing to support Level 5 cleanup of the former Rayonier Mill site in Port Angeles, WA

Level 5 cleanup is the ONLY option that the Dept. of Ecology should consider for the former Rayonier Mill site in Port Angeles, WA.

Doss, Dana

Date: 8/12/25
Method: Website
Comment: See below.

There is only one clear solution to the toxic mess that has leached for 30 years in the Port Angeles harbor: option 5, complete cleanup, removal and remediation. The entire community and residents of Clallam County support this.

Thank you!

Driscoll, Ryan

Date: 8/10/25
Method: Website
Comment: See below.

I am writing to support Level 5 cleanup of the former Rayonier Mill site in Port Angeles, WA

Level 5 cleanup is the ONLY option that the Dept. of Ecology should consider for the former Rayonier Mill site in Port Angeles, WA.

Duff, Katherine

Date: 8/11/25
Method: Website
Comment: See below.

I became involved in the cleanup of the Rayonier Mill site when they shut down and attempted to dispose of their toxic (dioxins, mercury, etc) facilities at the Mt Pleasant Landfill - to a height of about 60 feet. The contents of the sludge that was deposited to the landfill and left on the streets and access roads was verified through EPA testing. That was stopped but as we know the liners on those pits will at some point leak - they are not guaranteed to last forever. This leaves future residents to deal with possible hazardous materials leaching into their property. The buck was passed to future generations - again! The woman who lived on the access road to that dump, which was littered with sludge from the mill, developed multiple cancers, which is a sign of toxic exposures according to her doctor. She had small children. I remember attending meetings where her husband was begging for help from the state and Rayonier, but that never came.

The clean-up plan for the Mill site is proposed at the same inadequate, lazy, dangerous level as was permitted at the Mt. Pleasant landfill. Covering the toxic waste will only last so long before it starts leaching into the bay. This is another example of leaving the problem for future generations to clean.

It is time for the Rayonier Corporation to take responsibility for their mess. They enjoyed profits while operating here, fighting all pollution requirements. In order to save money they want to pass on their mess to future generations. They have stalled this for decades.

The only ethical, legal, and cost effective solution is to select Option 5 for a total clean-up of the site so it will be safe for residents, marine life, and future generations. Rayonier is already becoming a footnote in history books but their mess here continues. How is it even legal to knowingly leave a known health risk to people in the future who never benefitted from Rayonier's existence? Please select Option 5.

Dungeness Levee Trail Advocates

Date: 8/12/25
Method: Website
Comment: See below.

We attended the Ecology presentation at Field Hall as well as the virtual meeting/presentation at Port Angeles City Hall. It is clear that the best and only option for the cleanup is Option 5.

The public and environment has paid a huge price for the damage Rayonier did through its operations and continues to do through the delays in cleanup, and should accept nothing less than the total cleanup of the site.

Leaving contaminated materials onsite would mean that the public and environment would continue to bear the burden, risk, and uncertainty associated with them, including the potential for climate-related factors that could undermine their stability. All contaminants must be removed from the site!

It was clear from the presentation made by the City's consultant that the cost for Option 3 was underestimated, and the cost for Option 5 overestimated. With these options closer in cost than suggested by Rayonier's/Ecology's analysis, and factoring in the risk of retaining and capping the materials onsite, there is no excuse to do less than full cleanup through Option 5.

Furthermore, cleanup and restoration of Ennis Creek must be completed as soon as possible.

The site should be left undeveloped, and when safe should be made accessible to the public, which has endured the presence of this toxic eyesore for decades.

Thank you for accepting these comments,

Dungeness Levee Trail Advocates

Dziadek, Tammy

Date: 8/7/25
Method: Website
Comment: See below.

The former Rayonier mill site in Port Angeles needs a complete level 5 cleanup. As a long-time Port Angeles resident, I regularly ride bicycle in this area, and I also frequently kayak

there. Many Clallam County residents, and, indeed, many visitors pass the former mill site, with exposure to its many contaminates and toxins, via our Waterfront Trail. We deserve the life quality that a full cleanup would enable. Please treat us as first class, and not second class, Washingtonians.

Thank you.

Sincerely,

Dr. Tammy Dziadek
1106 Hazel Street
Port Angeles, WA 98363
tammydzi@protonmail.com

Eder, Kelvin

Date: 8/11/25
Method: Email
Comment: See below.

I support the permanent solution of Alternative SL-5 for contaminated soil and sediment at the former Rayonier Mill site in Port Angeles, WA. Proposed Alternative SL-3, leaving contaminated soil in place forever in a capped mound which will greatly limit future development, is unacceptable.

Kelvin Eder
215 N. Vine Street
Port Angeles Wa 98362
321 239 3414
kelvineder@mac.com

Ehtee, Pamela

Date: 8/8/25
Method: Email
Comment: See below.

Please hold Rayonier responsible to clean their site to a level 5 at Ennis Creek so that future restoration and development can be free of concern for the environmental effects of days past.

Ellison, Sarah

Date: 7/29/25
Method: Website
Comment: See below.

It is unconscionable that we would allow a company to profit for decades and then shirk full responsibility for the impacts of their profiteering. An incomplete job cleaning up now will fall on the taxpayers later, allowing irresponsible business owners to abscond with ill gotten profits. Requires a complete clean up that restores Ennis Creek fully and completely. SL5 is the only acceptable option.

Enerson, Hal

Date: 7/28/25
Method: Website
Comment: See below.

Please move forward to adopt SL5, not SL3.

SL5 is the only viable path forward.

SL3, which proposes capping and fencing off a contaminated 10-acre area with 30 years of monitoring, falls short.

Development under those conditions would be physically and legally constrained and unlikely to fulfill the Shoreline Master Plan's vision.

Worse still, SL3's costs may be underestimated, while SL5's have been unfairly inflated and its long-term value ignored.

Though Rayonier is zoned heavy industrial today, our new comprehensive plan reimagines it as a vibrant mix of open space, recreation, walkable commercial areas, hospitality, housing, public facilities and clean industries.

SL5 supports this vision with a complete, permanent cleanup.

It's not just preferable, it's essential to create a waterfront that's healthy, accessible and economically dynamic.

Please adopt SL5 and reject SL3. It is the only responsible option for this critical cleanup.

Engel, Eulalia

Date: 8/12/25
Method: Website
Comment: See below.

This plan sucks, yall know it, but just like DNR, the DOE, instead of protecting our forest and waters from toxins and clear cuts, sides with and enables the logging and old money operations that continue to pollute our environment and damage ecosystems without any accountability. Plans like this is the reason people furiously mistrust the motives of the department of ecology. I could face serious repercussions if I let my cow drink out of my pond on my property but Rayoneir can pollute a site for decades, leave it a wasteland, and you kindly suggest they pile their toxic waste up in a big mound and leave it there indefinitely while local tax payers foot the bill. What a sham and shame.

Enstrom, Greg

Date: 7/9/25
Method: Website
Comment: See below.

Ecology did a good job at the July 8th, 2025, Port Angeles presentation. I understand that some attendees do not understand nor like the constraints of existing laws that outline cleanup procedures. And private property rights are also at play in this large project.

I have 2 comments:

1) My primary concern is the proposed site location of the 55,000 cubic yards of contaminated soil that will be capped with 2 feet of topsoil. I find no mapped digital elevation data in the project records that show the consolidated dirty soil location's height above mean sea level. Though Ecology quickly dismissed the many public questions about tsunami risks with suggestions that project climate change analysis would address this, a tsunami is an independent earth movement risk event needing its own analysis. Yes, climate change may raise seawater levels across some selected future time period and augment or enhance a tsunami's potential destructive power. But a tsunami could happen

immediately and is not a risk event to be lumped with climate change risks, nor treated as an uncertain distant potential event linked to the uncertainties of climate change.

Elevation data absence aside, tsunami heights classically in the Pacific Northwest are modeled by universities to be particularly destructive in an elevation zone of 15 to 30 feet above sea level. These are only estimations of the height and area extent that might be affected by Geographic Information System mapping which can easily map and delineate the extent of an indundation area 30 feet (or greater) above mean sea level.

I propose you do the spatial analysis, examine the extent of potential tsunami-powered soil movement, and strongly consider removing that soil from the sealevel adjacency you now propose. Leaving the soil onsite pencils out as a cheaper alternative than removing 5500 10-cubic yard loads of soil, but failure to remove that soil leaves a high probabilty of dispersing all those contaminants you are concerned about across a much larger (and new) project area.

2) Finally, time is of the essence for a number of reasons, including widely expected increases in inflation, and the time risk exposure associated with protracted decision-making. I.e.: your high end project estimated cost of $28.7 million dollars is in 2019 year dollars. Consumer Price Index application, already today, only 6 years later pushes that figure to ~$36 million in today's dollars, a 25% increase to the costs you are using in discussions broadly about this project. You estimate 6 to 10 years to project completion and, conservatively, if completion is only 6 years ahead of us at 4% inflation that current $36 million will become 24% higher, which equals approximately $45 million in 2031 dollars, or $50 million in 2035 dollars 10 years out. These figures need to be used in current discussions so as to not underestimate budget needs by both Rayonier and by government.

Erickson, Diana L

Date: 8/12/25
Method: Website
Comment: See below.

The cleanup of this site has been under negotiation since 2001 by the Department of Ecology and Rayonier. This area has not only grown in population, but has also become a major tourist destination nationally and internationally—resulting in an increased use of the Olympic Discovery Trail which goes through the contaminated Rayonier site. Major changes have occurred in the understanding of pollution and the impact of chemicals on the environment and our food supply. Federal, State, County and local governments have

invested a great deal of time and money to improve and restore the environment, correcting mistakes (in part due to limited scientific understanding of the impacts) which damaged the environment and harmed human, aquatic and animal health.

Below are a few examples of recent actions and investments in the local area relating to environmental restoration and protection, as well as increased use by the community and visitors alike—impacting the local economy and quality of life.

• DOE fined two oil companies on August 5th over $1.3 Million each for sludge and dangerous waste on their properties and which is still being investigated for their impact.

• The July 20th tanker spill into the Elwah shut down drinking water for the City of Port Angeles and has unknown impact to protect newly restored salmon runs.

• Cost of repair to fish culverts on Ennis and Lee's Creek $136,000,000

• Olympic Discovery Trail Cost of Spruce Road Trail improvements $4,758,075.

Department of Ecology's stated requirements—"The cleanup action objectives include protection of the following: • *Humans who* ***could be exposed*** *to contaminated sediment or exposed indirectly through the consumption of seafood.* • *The benthic invertebrate community and higher-trophic-level organisms that* ***could be exposed*** *to contaminated sediment.* • *Aquatic life and humans that* ***could potentially be exposed*** *to contaminated groundwater via the discharge of groundwater to fresh and marine surface water and sediment, and direct contact during construction.* • *Humans and terrestrial wildlife that* ***could potentially come into contact with contaminated soil*** *in the Upland Study Area."*

These requirements clearly state that potential exposure must be considered. Given the Olympic Discovery Trail is used daily and travels through the contaminated area to be addressed, the exposure risk is high.

In the report it states. "Only one of the evaluated alternatives can satisfy the requirement to use **permanent** solutions to the maximum extent practicable" Requirements for determining the appropriate method are **Protectiveness, Permanence, Cost, Effectiveness over the long term, Management of short-term risks, Technical and administrative implementability,** and **Consideration of public concerns**."

Of the 7 requirements, only "**management of short term-risks**" can potentially be seen to meet the requirements in the Department of Ecology's proposed clean up.

The proposed approach does not **protect, provide permanence or assure effectiveness over the long term** for the area. Capping provides no guarantee that it will remain safe. Climate change will likely have both short and long-term impacts. We are already seeing a

change in sea and groundwater levels, an increase in the severity of storms, and experienced a recent tsunami risk. There is no guarantee that the capped area will not be impacted. In addition, a fence and occasional monitoring do not ensure access or exposure to animals or humans will not occur—the fence or cap can be damaged and expose the public to toxins. The only way to provide those assurances is to remove all known contaminants.

Cost must include the impact on the economy and community. Failing to remove the contamination, completely, places an additional burden on the state, county and local governments, non-profits, communities and local tribes who have invested in restoring salmon runs and the local ecosystem. It will have an impact on fishery and aquaculture—the harbor of Port Angeles and Salish Sea will not be safe with capped forever chemicals, given the uncertainty of rapid environmental changes which cannot be controlled or anticipated.

Technical and administrative implementability. The complete removal of toxins is as available as with the current proposal by DOE. What is not assured with the proposed plan, is future implementability given the environmental changes we cannot necessarily anticipate over the next 30 years. In addition, the possible impact of the toxins involved are not fully understood scientifically. The current proposal is insufficient, given the ability to completely mitigate the toxins by removing them.

Consideration of Public concerns. The public does not just include the local community. It includes the Tribes, the local community, businesses, visitors to the area (including those coming from out of state and internationally) and organizations invested in the health and well-being of the area. In addition, prehistoric indigenous sites, which have yet to be accessed cannot be accessed in such a contaminated environment.

The quality of life here is impacted by the presence of known toxins, no matter how well fenced and buried. The site is on the highly used Olympic Discovery Trail, and damage to the minimally fenced area with only 30 years of monitoring is a very real risk. It is the definition of an attractive nuisance. There is no way to assure the community that the toxins won't impact our economy, our food, our environment or our enjoyment of this area. That is why the overwhelming public response to the DOEs proposal is negative.

The only legitimate option, based on the Department of Ecology's own requirements, is the complete removal of toxins from the former Rayonier site. Rayonier is financially capable of correcting its damage. Its current reported value is $3.76 billion and it recently sold a property for $699,000,000. Partial removal is insufficient and unwarranted for the people of this community and this state.

Erickson, Ron

Date: 7/2/25
Method: Letter
Comment: See the following four pages.

Ron Erickson
934 W. Lauridsen Blvd. #209
Port Angeles, WA 98363

Marian Abbett, Site Manage
WA Dept. of Ecology
P.O. Box 47775
Olympia, WA 98504-7775

June 26, 2025

Dear Review Committee,

Attached is an article entitled, "What do Cattails and Hemp Have in Common? Learn about the Impressive Benefits of Phytoremediation." This article was hosted on the web by Straughan Environmental, Inc. (c) 2025.

I suspect that some of your consulting firms are familiar with phytoremediation, but they may not have yet used cattails as a component in the elimination of heavy metals. I was introduced to this concept forty years ago when I read an article about treating septage to become drinkable water. The final test was the survival of fish in the last testing tank. Frogs are also a good indicator of safe water. Frog skin is sensitive to chemicals and unsafe pH levels as species vacate a region when the pH level is harmful. Croak! Croak! No more croaking in the night!

In your publication 25-090092 - *Public Comment Period*: I saw no clear identification or list of plants used in the proposal. I saw the intent to use *permeable soil covers* on the 1-foot of imported soil.

Some plants specifically retain toxins in their foliage for possible removal and processing. Such could be included in your plan before resurfacing contaminated soils with layers of rock and fill. Or they could be part of the *permeable soil covers* for continual removal of heavy metals. This plant can enable the further removal of heavy metals and toxins from the area.

Although this plan asserts it *restores* the land, it does not consider the actual depth plant roots achieve. Alfalfa roots can reach 40 feet. Consequently, toxins may reach the surface to be consumed by wild animals and birds. How is this potential damage addressed in this plan?

I request that the plan identify the testing standards for cleanup areas.

In conclusion, I am concerned with the potential contamination of heavy metals from the covered contaminated soils. Heavy metals do not break down unless removed. It is my suggestion that your plan utilize phytoremediation and cattails in some way to eliminate contaminants in the buried soils. Such could occur before covering soils. Such could also be part of a post-monitoring of toxins escaping into a swampy ditch or pond area in the *shallow excavation areas*. I suggest planting and testing cattails annually until safe levels are acquired.

Respectfully,

Ron Erickson

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of Ecology (SWRO)

Blog
AUGUST 24, 2021

What do Cattails and Hemp Have in Common? Learn about the Impressive Benefits of Phytoremediation

BACK

By: Hannah McGee, Environmental Scientist

Many people know that plants can stabilize soil, provide food and habitat for wildlife, and improve the aesthetics of their surroundings, but did you know they can also remove harmful toxins from the environment?

Areas that have been developed and used for landfills, industry, mining, and other functions usually remain contaminated for decades, and full restoration of the soil and groundwater can be extremely difficult. In 1980, legislation was put forward to specifically address sites with high contamination levels. These sites, known as "Superfund sites," are still present in the thousands throughout the US and remain a lasting legacy of the pre-environmental industrial period.[1]

As an environmental consulting firm, Straughan tackles a variety of environmental problems – including remediation of Superfund sites. When restoring these sites we look at all possible methods, including the use of plants. The use of plants to reduce the concentration of contaminants in the soil and water is a field of study known as phytoremediation. The term originated in the 1990s, when a scientist named Ilya Raskin coined the term as part of a study examining the ability of plants to remove metals from soil and water.[2]

other toxins. phytoremediation can have different roles to play in the restoration process. completely broken down and removed from the environment, while others may be stored in the plant's tissue where it can either be harvested and removed or left at the site, where it reduces the transport of the contaminant to surrounding areas.[3]

When is Phytoremediation Useful?

Phytoremediation is utilized around the world for a myriad of reasons – in Italy, a sheep farmer discovered dioxin, a potent toxin, in his herd of sheep. Due to the toxin, the farmer was forced to cull his entire herd. He eventually traced the source of the toxin to a nearby steel plant. To continue farming, he had to find a way to decontaminate his soils. He found that he could plant hemp, which has shown a remarkable ability to store and transform toxins by removing them from the soil and transforming them into harmless compounds in their leaves.[4]

In another unusual case, phytoremediation was found to be a successful strategy in purifying explosive-laden groundwater at army ammunition plants. A 1997 study found that the addition of plants to contaminated groundwater removed 100% of TNT by transforming it into a less harmful compound.[5]

It's possible that even plastic waste can be addressed by phytoremediation practices. As plastics and their harmful byproducts (such as PCB) garner more attention, the scientific community has turned its eye to phytoremediation as a possible tool in contaminant reduction. By introducing the genes of bacteria that can metabolize PCBs, genetically altered plants may be an effective and cost-efficient method of pulling plastic contamination out of the environment.[6] As plastic use becomes more prevalent and older plastic continues to age, degrade, and leach toxins into the environment, plants may come to perform an even more critical role in public health.

Phytoremediation Spotlight: Cattails

Acting almost as a mascot of the wetland plant community, cattails are a widely known, familiar plant. Cattails are known for their characteristic flowers, edible tubers, and medicinal benefits,[7] but they can also act as potent phytoremediators. Cattails are one of the most popular phytoremediators for sites contaminated with heavy metals, as they are very effective at pulling metals from the soil and storing them in their leaves.[8], [9] Their hardiness and fast-growing nature position them as a favorite among contractors tasked with remediation of wetland sites.[10]

Want to learn more about phytoremediation? Check out these resources:

EPA Phytoremediation Resource Guide

[1] https://www.epa.gov/superfund/what-superfund

[2] https://plantbiology.rutgers.edu/faculty/raskin/Raskin%20Ilya_CV2017.PDF

[3] https://www.nature.com/scitable/knowledge/library/phytoremediation-17359669/

[4] https://www.cbsnews.com/news/cannabis-plant-soil-decontamination-italy-vincenzo-fornaro/

[5] Best, Elly P., Zappi, Mark E., Fredrickson, Herb L., Sprecher, Susan L., Larson, Steven L. *Screening of aquatic and wetland plant species for phytoremediation of explosives-contaminated groundwater from the Iowa Army Ammunition Plant*. Army Engineer Waterways Experiment Station Vicksburg MS Environmental Lab, (1997).

[6] https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3025541/

[7] https://www.mtpr.org/post/cattail-plant-thousand-uses

[8] Rai, Prabhat Kumar. "Heavy metal pollution in aquatic ecosystems and its phytoremediation using wetland plants: an ecosustainable approach." International journal of phytoremediation 10.2 (2008): 133-160.

[9] Borowiak, Klaudia, and Kanclerz, Jolanta. "Phytoremediation Applications for Waste Water and Improved Water Quality." Phytoremediation. Springer, Cham (2016): 213-232.

[10] Neralla, S., et al. "Phytoremediation and on-site treatment of septic effluents in sub-surface flow constructed wetlands." Environmental technology 20.11 (1999): 1139-1146.

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Erickson, MDiv. JD, Diana

Date: 8/12/25
Method: Email
Comment: See below.

Mr. Sixkiller,

Thank you for your commitment to protecting our lands, waterways and larger environment. I recognize you have many claims on your attention and have to balance sometimes competing demands and responsibilities. Yours is a difficult job.

The cleanup of the old Rayonier is one of the challenges the Department of Ecology faces. I and my community are very dismayed that the Department of Ecology is not requiring a full clean up pf the old Rayonier Mill in Port Angeles. This negotiation has been going on since 2001. It seems to be an enormous waste of resources and time given the millions of dollars which have been spent to restore fish passages, improve the economy of our area through tourism, business and locally sourced food--to name a few, because of an incomplete cleanup leaving forever toxins in the ground, rather than removing them. Yes, we are a smaller city, however, climate maps show that we will be a preferred destination for those relocating because of climate change. Below is my statement to DOE. Please protect the interest of our communities, local, tribal, county and visitors, in advocating for the full cleanup of the Rayonier site in Port Angeles.

DOE Submitted Public Comment:

The cleanup of this site has been under negotiation since 2001 by the Department of Ecology and Rayonier. This area has not only grown in population, but has also become a major tourist destination nationally and internationally—resulting in an increased use of the Olympic Discovery Trail which goes through the contaminated Rayonier site. Major changes have occurred in the understanding of pollution and the impact of chemicals on the environment and our food supply. Federal, State, County and local governments have invested a great deal of time and money to improve and restore the environment, correcting mistakes (in part due to limited scientific understanding of the impacts) which damaged the environment and harmed human, aquatic and animal health.

Below are a few examples of recent actions and investments in the local area relating to environmental restoration and protection, as well as increased use by the community and visitors alike—impacting the local economy and quality of life.

• DOE fined two oil companies on August 5th over $1.3 Million each for sludge and dangerous waste on their properties and which is still being investigated for their impact.

• The July 20th tanker spill into the Elwah shut down drinking water for the City of Port Angeles and has unknown impact to protect newly restored salmon runs.

• Cost of repair to fish culverts on Ennis and Lee's Creek $136,000,000

• Olympic Discovery Trail Cost of Spruce Road Trail improvements $4,758,075.

Department of Ecology's stated requirements-- "The cleanup action objectives include protection of the following: • Humans who could be exposed to contaminated sediment or exposed indirectly through the consumption of seafood. • The benthic invertebrate community and higher-trophic-level organisms that could be exposed to contaminated sediment. • Aquatic life and humans that could potentially be exposed to contaminated groundwater via the discharge of groundwater to fresh and marine surface water and sediment, and direct contact during construction. • Humans and terrestrial wildlife that could potentially come into contact with contaminated soil in the Upland Study Area."

These requirements clearly state that potential exposure must be considered. Given the Olympic Discovery Trail is used daily and travels through the contaminated area to be addressed, the exposure risk is high.

In the report it states. "Only one of the evaluated alternatives can satisfy the requirement to use permanent solutions to the maximum extent practicable" Requirements for determining the appropriate method are Protectiveness, Permanence, Cost, Effectiveness over the long term, Management of short-term risks, Technical and administrative implementability, and Consideration of public concerns."

Of the 7 requirements, only "management of short term-risks" can potentially be seen to meet the requirements in the Department of Ecology's proposed clean up.

The proposed approach does not "protect, provide permanence or assure effectiveness over the long term" for the area. Capping provides no guarantee that it will remain safe. Climate change will likely have both short and long-term impacts. We are already seeing a change in sea and groundwater levels, an increase in the severity of storms, and experienced a recent tsunami risk. There is no guarantee that the capped area will not be impacted. In addition, a fence and occasional monitoring do not ensure access or exposure to animals or humans will not occur—the fence or cap can be damaged and expose the public to toxins. The only way to provide those assurances is to remove all known contaminants.

"Cost" must include the impact on the economy and community. Failing to remove the contamination, completely, places an additional burden on the state, county and local governments, non-profits, communities and local tribes who have invested in

restoring salmon runs and the local ecosystem. It will have an impact on fishery and aquaculture—the harbor of Port Angeles and Salish Sea will not be safe with capped forever chemicals, given the uncertainty of rapid environmental changes which cannot be controlled or anticipated.

“Technical and administrative implementability.” The complete removal of toxins is as available as with the current proposal by DOE. What is not assured with the proposed plan, is future implementability given the environmental changes we cannot necessarily anticipate over the next 30 years. In addition, the possible impact of the toxins involved are not fully understood scientifically. The current proposal is insufficient, given the ability to completely mitigate the toxins by removing them.

“Consideration of Public concerns.” The public does not just include the local community. It includes the Tribes, the local community, businesses, visitors to the area (including those coming from out of state and internationally) and organizations invested in the health and well-being of the area. In addition, prehistoric indigenous sites, which have yet to be accessed cannot be accessed in such a contaminated environment.

The quality of life here is impacted by the presence of known toxins, no matter how well fenced and buried. The site is on the highly used Olympic Discovery Trail, and damage to the minimally fenced area with only 30 years of monitoring is a very real risk. It is the definition of an attractive nuisance. There is no way to assure the community that the toxins won’t impact our economy, our food, our environment or our enjoyment of this area. That is why the overwhelming public response to the DOEs proposal is negative.

The only legitimate option, based on the Department of Ecology’s own requirements, is the complete removal of toxins from the former Rayonier site. Rayonier is financially capable of correcting its damage. Its current reported value is $3.76 billion and it recently sold a property for $699,000,000. Partial removal is insufficient and unwarranted for the people of this community and this state.

Thank you for taking the time to read and consider my comments.

Diana L. Erickson, MDiv. JD
2227 E Lindberg Road
Port Angeles, WA 98362

Sent from my iPad

Esquivel, Isabel

Date: 8/10/25
Method: Website
Comment: See below.

Option 5 MUST be chosen for cleaning up the Rayonier Mill site. Leaving a toxic dump for to hurt us and future generations is absolutely unacceptable. I live just outside of the city and frequently use the Olympic Discovery Trail with my children. Do the right thing, the healthy thing, clean up the mess completely and forever. Choose option 5, the only one that makes sense.

Evans, Shaelee on behalf of Goodness Tea Farm

Date: 8/10/25
Method: Website
Comment: See below.

I support the City of Port Angeles and agree with their recommendation for option 5. This area needs to be fully cleaned up.

Leaving a large mound of contaminants to be monitored is taxing generations ahead with surveying this pollution problem and limited public access and development of a critical and wonderful stretch of waterfront. Option 3 is a partial measure that will cost more over time in monitoring and lost economic potential in addition to continuing to harm wildlife and the environment.

The only sensible answer is a full and complete cleanup.

Evert, Summer

Date: 8/11/25
Method: Website
Comment: See below.

The mill site MUST be COMPLETELY and Thoroughly cleaned. Anything less than absolutely clean is a huge disservice to our community. Every single ine if us relies in preservation of our environment in one way or another, whether it is employment in the hospitality industry or the waters we drink and fish in.

We broke it. We must fix it!

Fariss-Bateman, Barbara

Date: 8/12/25
Method: Website
Comment: See below.

I support Alternative SL-5, full and complete removal of contaminated materials from the site, for these reasons: 1) This shoreline, off shore and upland habitat is too valuable for the long term environmental health of the Strait of Juan de Fuca to leave the contaminants 'capped and covered'. Not enough is known about the role of the area's extensive network of underground waterways. 2) It would be detrimental to the long term growth and financial success of the City of PA to abandon this much premier waterfront property to a permanent non usable area. Short term costs incurred by removal to an appropriate controlled hazardous waste facility will be vastly outweighed by the long term benefits potential for development and recreation. 3) Future adherence to DOE covenants and restrictions cannot be guaranteed. By allowing cap & cover to proceed the City would be greatly elevating their risk of responsibility for future negative environmental and financial impacts.

Thank you.

Feltham, Wendy

Date: 7/31/25
Method: Website
Comment: See below.

From: Wendy Feltham wfeltham9@gmail.com
Sent: Thursday, July 31, 2025 8:00 PM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Cc: Sixkiller, Casey (ECY) csix461@ECY.WA.GOV
Subject: Rayonier Pulp Mill Cleanup

Dear Marian Abbott,

I am writing to express my support for the Port Angeles City Council's Option 5 regarding the Rayonier Pulp Cleanup. I live in neighboring Port Townsend, and often visit Port Angeles. This is why I have followed this disaster for years.

Please ensure Ennis Creek is restored to its original shape and given space to continue the movement essential for a salmon stream, recreating the brackish water at the mouth of Ennis Creek for the salmon.

I strongly support returning this area to its natural state to attract wildlife and connect it with the wildlife corridor to the east towards Sequim and Jefferson County, where I live.

I strongly oppose rebuilding on the site. Construction will face the same climate conditions as the mill infrastructure -- sea level rise, storm surges, tsunamis, earthquakes.

I urge you to ensure that the Natural Resource Damage Assessment parties complete their work for cleaning up and providing other restoration for federal resources contaminated by the Rayonier Pulp Mill. The decision makers are NOAA, USFWS, the Klallam Tribes and WA State Ecology.

Sincerely,

Wendy Feltham
Port Townsend

Fitzsimmons, William

Date: 8/5/25
Method: Website
Comment: See below.

There is the opportunity now to require a multi billion dollar corporation to stop padding their bottom line at the expense of the environment and the local population who call PORT ANGELES home. It is probably the only chance we have at restoring an area that should be the showcase of our town. Please require a complete clean up and restoration of sensitive and environmentally fragile waterfront property so that generations to come can benefit from the enjoyment it brings. In doing so not only will you be doing the just and proper thing. You will also help alleviate the distrust engendered when political forces cave to corporate interests at the expense of their constituents. Lord knows this country needs a healthy dose of that. It is your opportunity to do your part. Please take advantage of it. Respectfully, William D Fitzsimmons, an adjacent neighbor of the mess Rayonier is trying to bequeath to us.

Fitzsimmons, William

Date: 8/5/25
Method: Email
Comment: See below.

From: William Fitzsimmons wdfitz1@gmail.com
Sent: Tuesday, August 5, 2025 10:46 AM

To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Subject: PORT ANGELES clean up

There is the opportunity now to require a multi billion dollar corporation to stop padding their bottom line at the expense of the environment and the local population who call PORT ANGELES home. It is probably the only chance we have at restoring an area that should be the showcase of our town. Please require a complete clean up and restoration of sensitive and environmentally fragile waterfront property so that generations to come can benefit from the enjoyment it brings. In doing so not only will you be doing the just and proper thing. You will also help alleviate the distrust engendered when political forces cave to corporate interests at the expense of their constituents. Lord knows this country needs a healthy dose of that. It is your opportunity to do your part. Please take advantage of it. Respectfully, William D Fitzsimmons, an adjacent neighbor of the mess Rayonier is trying to bequeath to us.

Force, Laurie

Date: 8/9/25
Method: Website
Comment: See below.

Any action (or inaction) other than total cleanup of the Rayonier site is unacceptable.

Ford, Catherine

Date: 8/6/25
Method: Website
Comment: See below.

I wish to express concerns regarding the current cost-benefit analysis and selection of SL3 as the preferred cleanup solution overseen by the Department of Ecology (DOE) and consultants hired by Rayonier.

It appears that DOE's oversight of the cost and benefit estimates has been insufficient. The DOE has stated that the law (RCW) requires SL3 to be selected due to its cost-benefit ratio. However, a detailed review shows that SL3 costs have been understated, while SL5 costs have been overstated by approximately $27 million, resulting in a skewed preference toward SL3.

Key cost components for SL3—including permitting, design, modeling, ongoing maintenance, monitoring by Rayonier, coordination with sediment cleanup, and

addressing potential toxicity in untested sediments—are either underestimated or omitted. At the same time, SL3's benefits seem inflated, with important liabilities such as damage to the capped toxic soil and costs related to sea level rise and extreme weather not reflected.

The analysis does not account for significant economic impacts, such as lost tax revenue or other consequences from environmental damage. This narrow focus limits a full understanding of the true long-term costs.

SL5's cost estimates include questionable expenses such as a $75,000 restrictive covenant preparation charge, which should not be included, and unusually high non-construction costs compared to SL3, undermining the accuracy of the analysis.

From an environmental perspective, the valuation fails to include crucial ecosystem services—such as fish, salmonids, and estuary health—that are essential and currently impaired. This omission undervalues the importance of a permanent cleanup.

SL3 is more complex than represented, requiring physical barriers, signage, decades of monitoring, environmental covenants, and ongoing maintenance—responsibilities that Rayonier will bear long-term. Yet, this complexity is underappreciated or ignored in the scoring, while SL5, which uses proven excavation and transfer techniques, is undervalued.

Important considerations such as compliance with the Comprehensive Plan, resilience to ongoing and future environmental challenges, and maintenance costs are missing from the evaluation but are critical for a sustainable solution.

For the benefit of the local environment, community, future generations, and Rayonier itself, I urge that SL5 be reconsidered as the preferred cleanup option. It offers a permanent, more straightforward, and reusable property outcome, aligning better with public interest and long-term environmental stewardship.

Thank you for your attention to these important issues. I respectfully request a thorough re-evaluation of the cost-benefit analysis and selection process to ensure the most effective, permanent, and economically sound cleanup solution is chosen.

Fox, David

Date: 8/9/25
Method: Website
Comment: See below.

Hello, I'm a retired RN, with a degree in global health and tropical medicine. Our home is blessed with beautiful nature with a glaring exception; the former Rayonier mill site. We've

been looking at it surrounded by fencing for decades and nothing's been done. When I attended the presentation put on by Ecology at the Field Hall last month, I thought I would land in the "let's just get it done camp". I expected Ecology would have a "good enough" plan that I would gladly accept. "I don't need things perfect" I thought, as I walked into the lobby. I was surprised to see so many yummy treats and smiling faces there to greet me. I was a little put off by that, getting the feeling like someone was trying to sell me a timeshare. But I pushed back that feeling and entered the hall with an open mind. But I was astonished to hear the plan. A whole hour was used to say what I can say in one sentence, "Push it into a pile and cover it up" or "Sweep it under the rug". I thought, "You've got to be kidding me!" Why do they call it Ecology"! And we are supposed to trust the same people who left the mess all of this time to do the work and to monitor it? OK...sure. And they are broke...at least that's what my County Commissioner told me. No way folks. Do it right. Sincerely, David Fox

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Frank, Cameron

Date: 7/31/25
Method: Website
Comment: See below.

I do not believe a partial clean up is sufficient as it would leave horrible chemical contaminants there forever. We need full remediation so our children can play there one day, and so we can one day eat fish from the harbor again. Please consider doing the most full-on hardcore clean up possible for the sake of future generations. Now is our chance!

Fredrickson, Connor

Date: 8/9/25
Method: Website
Comment: See below.

Clean it once, and clean it thoroughly. Consider Cleanup Alternative 5 so this space can be toxin free and enjoyed by the community for years to come. Don't just cover up past mistakes, fix them.

Fredson, Deborah

Date: 8/9/25
Method: Website
Comment: See below.

The former Rayonier Mill in Port Angeles needs a complete clean-up using option 5. It is the ONLY option good enough for our town!

Fretter, Tamina

Date: 8/12/25
Method: Website
Comment: See below.

It is imperative that the Rayonier Mill site is cleaned up to level 5 status. We must respect and preserve the natural habitat that supports our lives. Thank you

Tamina Fretter

Gale, Joseph

Date: 6/13/25
Method: Website
Comment: See below.

Dear Ms. Marian Abbett,

My name is Joseph Gale, and my family and I live in Port Angeles. Per page 3 of the Public Comment Period Document, section “Proposed cleanup plans,” how did the department of ecology determine that this “interim action” is expected to be the final cleanup action needed for the Rayonier Mill Study Area?

This sections goes on to say that “Rayonier remains responsible for any additional cleanup of the site, outside of the study area, as required by MTCA”. What properties/areas are included “outside of the study area”, for which Rayonier would potentially clean up in the future? Are any additional clean up actions or funds from Rayonier anticipated to be received to support regeneration of this site for future use cases?

Would cleanup of the site to the level of determination selected by the Washington state department of ecology be compatible with park/recreational land use? It would be a great asset to the Port Angeles community if this area were to become a community park or natural area for recreational use as it is conveniently situated adjacent to the Discovery Trail and a short walk from downtown Port Angeles.

Thanks for your time and feedback.

Sincerely,

Joseph Gale

Gallant, Connie

Date: 7/27/25
Method: Website
Comment: See below.

I support the SL5 solution. It is the only logical and final solution to finally resolve the incredible toxic pollution caused by Rayonier throughout the years after profiting from running the mill and harvesting majestic trees from our beautiful Olympic Peninsula. Restoration of Ennis Creek is crucial to salmon run and other wildlife. After the incredible amount of money, time, and effort we all spent on removing one of the largest dams in our state and seeing the wonderful results from it, we owe the same to the City of Port Angeles and its residents. It is high time that we stand up for the future of our environment and solve such ill-fated crisis. If we do not do it, it will totally destroy Ennis Creek and the surrounding area, leaving the city of Port Angeles with a permanent pox mark. SL5!

Gartside, Ellen

Date: 8/10/25
Method: Website
Comment: See below.

Regarding the Rayonier Mill project, I am submitting questions rather than comments.

1. How were the boundaries of study area determined?

2. Was there sampling done outside of the study area that shows contaminants are below clean up levels outside of the study area?

3. Please clarify that all of the dock pilings and jetty will be removed before sediment cleanup can begin since the removal of these structures may potentially change how contaminants are distributed in the sediment clean up unit?

4. Will there be additional sampling in the sediment clean up unit after removal of the dock and jetty to determine how distribution of contaminants may have changed?

5. How many air sparging remediation wells will be required?

6. Does each black square in slide #50 from the Power Point presentation represent a well?

7. How long will air sparging be required?

8. How much noise do the air sparging wells produce?

9. Are there vapors released from the ground during the air sparging process?

10. If so, how are these vapors controlled?

11. Regarding the dioxins in Ennis Creek surface water, where is the upstream contamination coming from?

Thank you!

Geddes, Elizabeth

Date: 7/26/25
Method: Website
Comment: See below.

This site has been an eyesore and a blight on the waterfront of Port Angeles for far too long. A partial cleanup is not an answer that will help our city to make use of this valuable property. I support SL5 as the only path forward. Anything other than a complete cleanup is cheating the future of Port Angeles.

Germain, Carmen

Date: 8/9/25
Method: Website
Comment: See below.

Public and environmental health for our town and surrounding watershed must be a priority. I support clean-up to Level Five. The future, even given the best science, is unpredictable. The political will and/or the economic situation may have changed by the time the phase of revisiting the site for more mitigation appears. We must take the opportunity for complete removal of toxins from the harbor before the unknown future decides for us. It will then be too late.

Giuntoli, Philip

Date: 7/24/25
Method: Website
Comment: See below.

Why wait thirty years and then cheap out on the process? Remove the material. An earthquake could easily disrupt the encapsulation. This could be a premier destination site. Make it whole.

Golde, Marcy

Date: 7/27/25
Method: Website
Comment: See below.

"I support the SL5 solution. It is the only logical and final solution to finally resolve the incredible toxic pollution caused by Rayonier throughout the years after profiting from running the mill and harvesting majestic trees from our beautiful Olympic Peninsula. Restoration of Ennis Creek is crucial to salmon run and other wildlife. After the incredible amount of money, time, and effort we all spent on removing one of the largest dams in our state and seeing the wonderful results from it, we owe the same to the City of Port Angeles and its residents. It is high time that we stand up for the future of our environment and solve such an ill-fated crisis. If we do not do it, it will totally destroy Ennis Creek and the surrounding area, leaving the city of Port Angeles with a permanent pox mark. SL5!"

Goldstein, David

Date: 8/12/25
Method: Website
Comment: See below.

As a twenty five year resident of Clallam County, I support only Alternative S-5 /SL-5 for the Rayonier mill Cleanup site. Sadly as long as this project has taken, I doubt I will still be alive to see its completion. However, I strongly believe that the current and future residents of Port Angeles deserve a complete cleanup fo the Rayonier mill site so that it can be fully developed into something that will benefit all current and future residents in the near future. Thank you for your consideration.

David Goldstein

Gonzalez, Dioselin

Date: 8/9/25
Method: Website
Comment: See below.

Like many other residents of Port Angeles, I believe Level 5 cleanup is the ONLY option that the Dept. of Ecology should consider for the former Rayonier Mill site in Port Angeles, WA. Thank you.

Good, Ron

Date: 8/9/25
Method: Email
Comment: See below.

Hello Washington state Department of Ecology,

I am writing regarding the proposed clean-up plan for the Rayonier site in Port Angeles.

Any clean-up plan for the site must be comprehensive in order to take into account long-term protection of aquatic life, animal terrestrial life, avian life, soils, plant life and human life not only on the immediate site but in connected areas of the site as well. After all, like John Muir said, "Everything is connected to everything else in the Universe."

For these reasons, I am supporting alternative SL-5 as the best alternative because it provides for a permanent and long-term solution to the problems, unlike SL-3 which is inadequate to address all of the above long-term and connected issues.

Thank you for taking my concerns into your decision-making process.

Ron Good
151 Gehrke Road
Port Angeles, WA 98362

Grad, Brian

Date: 8/10/25
Method: Website
Comment: See below.

I support and urge action for a full clean-up of Port Angeles Harbor. Plans to cap the contaminated soils will not provide the confidence that reclamation will be successful. Only the removal of all identified contaminant sources can allow for the restoration of

environmental factors necessary to promote a healthy environment for marine species. Without posting a bond sufficient to cover any potential further degradation caused by existing pollutants, the proposed monitoring program is meaningless. Public Health is inextricably linked to a healthy environment and cannot be guaranteed unless a total clean-up is accomplished.

Greeson, Roxanne on behalf of The Hubbub, LLC

Date: 8/7/25
Method: Website
Comment: See below.

August 7, 2025
Re: Rayonier Mill Cleanup – Support for Option SL-5 (Full Removal)

Dear Department of Ecology Team,

At The Hub, we are committed to creativity, community, and building a future that honors both people and place. We are writing to strongly urge the Department of Ecology to adopt Option SL-5—the full removal of contaminated materials from the former Rayonier Mill site in Port Angeles. Anything less is not just short-sighted—it's a failure to reckon with the full weight of this site's toxic legacy.

For decades, the Rayonier Mill discharged waste and chemicals into Port Angeles Harbor and the surrounding lands. Our community has lived with the consequences: polluted shorelines, long-term ecological damage, and a profound erosion of public trust. Today, we have a chance to restore that trust—not with temporary fixes or buried problems, but with decisive action that clears the way for a truly healthy and revitalized waterfront.

We cannot build a vibrant, resilient future on a capped landfill of toxic waste. Option SL-3—the proposal to simply move and cover the contamination on-site—might check a regulatory box, but it leaves behind the same burden we've carried for generations. It's a half-measure that perpetuates harm and hinders meaningful redevelopment.

Option SL-5 is the only reasonable pathway forward. It's the only option that fully removes contamination and allows Port Angeles to begin again—with transparency, integrity, and clean ground beneath our feet. It sends a powerful message: that state agencies are willing to prioritize public health over corporate convenience, and that the future of our harbor is not for sale.

The Rayonier site should be a place where children can safely play, where salmon can thrive, and where local businesses can grow without fear of hidden toxins. Port Angeles deserves a waterfront we can proudly reclaim—not just cosmetically, but completely.

We urge you: choose SL-5. Rebuild trust. Restore the land. Let this be a turning point we can all believe in.

Sincerely

Roxanne Greeson
CEO, The Hub
roxanne@thehub.art

Grello, Sam

Date: 8/12/25
Method: Website
Comment: See below.

I am writing this comment as a citizen who lives and works in Port Angeles. I regularly walk or kayak to work downtown from the 9/11 Memorial park. I have attended the public meetings about this cleanup that were hosted by Ecology and by the City of Port Angeles. I am in favor of a full removal of contaminated materials (Option 5) over the consolidation and capping of materials onsite (Option 3). I would ask the Department of Ecology to revisit the pricing estimates for Cleanup options 3 and 5.

The removal of the creosote pilings is not in this cleanup plan. I want the creosote pilings to be addressed in an adopted cleanup plan.

In the City presentation with the consultant group (Integral Consulting) the City hired, Ms. Ott mentioned that new contaminants had been found on site over the past thirty or so years. They were found not because new polluting had been done but because new science had been done and we now recognized new "bad" chemicals. What other undiscovered contaminants may be newly classified in the next 30 years of monitoring (if option 3 is selected)? Will a whole new process have to be undertaken at that point to clean up the newly discovered contaminants that were not accounted for in the current cleanup plan? Is this possibility accounted for when considering Option 3 as cheaper than Option 5?

Thank you for considering to re-evaluate your decision. In a time when democracy is under assault by big business it is you the government employee who still has discretionary

power to hold powerful companies accountable for their actions. Thank you for your service and I hope you sleep well at night.

Grello, Sam on behalf of the Port Angeles Waterfront District

Date: 8/12/25
Method: Website
Comment: See below.

The Port Angeles Waterfront District is officially asking that the Department of Ecology change their apparent recommendation of the proposed cleanup option from SL-3 (permanent consolidation of contaminated materials onsite) to SL-5 (complete removal of contaminated materials).

After attending the Department of Ecology's local presentations on 7/8/25 at Field Hall and 7/15/25 at the Port Angeles Business Association meeting, we understand why the Department of Ecology favors Option SL-3 over Option SL-5. Marian Abbett did a good job presenting the Department of Ecology's decision-making process. According to the Department of Ecology's analysis, Option SL-5 appears prohibitively expensive for the polluter, Rayonier, and SL-5 received only a slightly higher overall benefit score in their analysis than Option SL-3. The Department of Ecology used a Disproportionate Cost Analysis to make this determination.

In our opinion, the Disproportionate Cost Analysis needs to be re-evaluated, and we ask that the Department of Ecology do so in good faith before moving forward with this process. More data is required to determine and compare actual cleanup costs.

We also attended an additional meeting about the Rayonier Mill Clean Up, hosted by the City of Port Angeles. The City hired Nicole Ott, Integral Consulting, to review the recommended cleanup plan (SL-3) and give a presentation. In her presentation, Ms. Ott highlighted some of the inaccuracies in the cost estimates for both SL-3 and SL-5 options, as well as some seemingly unconsidered factors. For example, was the opportunity cost in loss of tax revenue and other economic benefits considered? Under the recommended SL-3 option, the land would be cleaned up to “unrestricted use cleanup level,” however, restrictive environmental covenants will be placed on the site due to the cap, limiting the use of that land forever. If the State claims that the additional $27 million for Option SL-5 is too expensive for the polluter to clean up, no one ever will, and the Department of Ecology is creating the State's prettiest toxic dump. The costs to design and build the cap are loosely understood; the numbers used are very vague in the plan and SL-3 is likely to cost more. Since these costs are what the Department of Ecology used to recommend the

cleanup plan, we ask that the Department do better in assessing these costs. The cost estimates for design should match the complexity of this project, rather than based on loose estimates. But currently the design cost estimates use vague percentages tied to estimated construction costs. This is likely an underestimate due to both methodology AND the current rate of inflation.

Our membership and our community are understandably riled about this and very frustrated. Please reconsider the cleanup option you seem to be recommending. Like any community would, we want and deserve a permanent solution to this toxic site in the form of a complete removal of contaminated materials. Allowing the polluter to leave behind the contaminated materials they brought is not a solution; and therefore SL-3 is not an acceptable option.

Gussman, John

Date: 8/11/25
Method: Email
Comment: See below.

I wanted to let you know I fully upport the Port Angeles City Council decision - Option 5

We need to factor in to its cleanup cost analysis impacts to fish, wildlife, the environment and human health. All contaminated soils should be removed, and removal of all concrete pads and pilings. Ensure Ennis Creek is restored to its original shape and meanders.

This cleanup is so very important and Dept. of Ecology should do the right thing and fix all the damage that humans have done. If we can easily break it we should be able to fix it. thanks, John Gussman

---

Gyori, William

Date: 8/11/25
Method: Website
Comment: See below.

There needs to be a total and complete cleanup on this site

Halberg, Sean

Date: 8/12/25
Method: Website
Comment: See below.

The plan for the upland areas seems inadequate and harmful over the long run. All contaminated soil should be removed in the upland area, or at least to a depth where capping is less about a barrier between contaminated soil and soil that is safe for humans and wildlife, and more about restoring the natural topography and landscape.

Halberg, Kristin

Date: 8/9/25
Method: Website
Comment: See below.

Mill site in Port Angeles, WA

Level 5 cleanup is the ONLY option that the Dept. of Ecology should consider for the former Rayonier Mill site in Port Angeles, WA.

Hamilton, Jon

Date: 7/25/25
Method: Email
Comment: See below.

From: Jon Hamilton hamilton.jon1116@gmail.com
Sent: Friday, July 25, 2025 11:50 PM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Subject: Public Comment on Rayonier Mill Cleanup – Support for SL-5

Dear Ms. Abbett,

My name is Jon Hamilton, and I am a long-time Port Angeles resident and community member deeply invested in the future of our city and its environment. I am writing to submit my public comment on the proposed cleanup plans for the Rayonier Mill site.

I strongly urge the Washington State Department of Ecology to adopt **Option SL-5**, the only plan that ensures complete removal of toxic and contaminated soil from the site.

Anything less than full remediation—such as the currently recommended SL-3 option—would leave future generations burdened by the costs, risks, and limitations of a capped,

contaminated site. The community has clearly expressed its desire for a permanent solution that restores the land, protects public health, supports salmon recovery, and allows for a meaningful and sustainable future reuse of the property.

The Rayonier site lies adjacent to the Elwha River and Ennis Creek—critical ecological and cultural corridors for the Lower Elwha Klallam Tribe. We must do better by the river and by the Tribe, who have already invested decades into salmon restoration efforts in this region.

SL-5 is not just the most environmentally responsible option—it is also the most aligned with the community's long-term vision, as reflected in the City of Port Angeles Comprehensive Plan, which prioritizes a mixed-use future for this site.

The Department of Ecology has a responsibility to hold Rayonier accountable and to demonstrate leadership in climate-forward ecological restoration. Port Angeles deserves a real cleanup, not a shortcut.

Thank you for your time and consideration.

Sincerely,

Jon Hamilton
1116 Eckard Ave.
Port Angeles, WA 98362
hamilton.jon1116@gmail.com
(360) 477-8225

Hamilton, Jon

Date: 8/6/25
Method: Website
Comment: See below.

I strongly support SL-5 for the Rayonier Mill cleanup. Only full removal of contamination will protect our environment, public health, and future waterfront use. The City Council, Tribe, and many residents agree—SL-5 is the right path forward. Please choose SL-5.

Hamilton, Jon

Date: 8/8/25
Method: Website
Comment: See below and the following two pages.

I am submitting the attached letter summarizing a thematic analysis of all unique public comments posted to the Department of Ecology's portal through August 8, 2025, regarding the Rayonier Mill site cleanup.

This analysis, conducted using Braun and Clarke's (2022) approach, identifies seven recurring themes from residents, business owners, environmental organizations, and local governments. Across these perspectives, there is consistent and overwhelming support for Cleanup Alternative SL-5 as the only solution that is permanent, climate-resilient, and aligned with long-term community and environmental well-being.

I respectfully urge the Department of Ecology to adopt SL-5, in alignment with the positions of the Port Angeles City Council, the Lower Elwha Klallam Tribe, and the clear consensus reflected in the public record.

Jon Hamilton
1116 Eckard Ave.
Port Angeles, WA 98362

August 12, 2025

Marian Abbett
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Subject: Public Comment Summary and Thematic Analysis – Rayonier Mill Site Cleanup Plan

Dear Ms. Abbett,

I am writing to provide a consolidated thematic analysis of the public comments submitted to the Washington State Department of Ecology (DOE) regarding the proposed cleanup of the former Rayonier Mill site in Port Angeles, WA. This synthesis is based on all unique public comments posted to DOE's public portal through August 8, 2025. My intent is to ensure that DOE's decision-making process fully considers the breadth and depth of the community's expressed priorities, concerns, and recommendations.

The analysis was conducted using Braun and Clarke's (2022) approach to thematic analysis, systematically reviewing each public comment, identifying recurring codes, and grouping them into coherent themes. The result is a transparent, data-driven summary that reflects the consensus of residents, business owners, environmental organizations, and local government representatives.

1. **Only SL-5 Offers True Permanence**
Community members overwhelmingly reject capping (SL-3) as a temporary measure prone to failure. Full removal (SL-5) is viewed as the only safe and final solution.

> ***"The Port Angeles community does not want toxic waste capped on site."***

2. **The Site is Too Vulnerable for Half Measures**
Many comments cite sea level rise, tsunamis, earthquake risk, and liquefaction potential as reasons SL-3 is unsafe.

> ***"What happens when a Cascadia event causes the site to sink and re-release contaminants?"***

3. **The State's Math Doesn't Add Up**
Commenters challenge DOE's cost-benefit analysis, citing undervalued habitat restoration, uncounted disaster risks, and inflated SL-5 costs.

> ***"Please do not sacrifice our long-term benefits for short-term cost considerations."***

4. **Restore the Creek, Restore the Coast**
Restoration of Ennis Creek and adjacent estuary is a recurring priority for salmon recovery, orca food supply, and biodiversity.

> ***"Our habitat deserves to have all hazardous material fully removed."***

5. **Our Health and Our Children Come First**
Public health, especially child safety, is a central concern—raised by parents, educators, and childcare providers located near the site.

> ***"We want the area clean so our children can safely explore it again."***

6. **Clean Land is Good Business**
SL-5 is linked to long-term economic opportunity—parks, housing, commercial spaces, and a revitalized waterfront.

> ***"A park, walking paths, and restaurants would be an awesome change for Port Angeles."***

7. **Trust is Earned by Doing the Right Thing**
Comments express skepticism about the process and urge DOE to follow the unified positions of the Port Angeles City Council and the Lower Elwha Klallam Tribe.

> ***"They broke it; they should fix it."***

Across all perspectives—residential, commercial, environmental, and governmental—the call is clear: adopt SL-5, the full cleanup alternative. This approach protects public health, restores vital habitat, ensures long-term site stability, and honors the overwhelming public consensus and the City and Tribe's positions.

I urge the Department of Ecology to listen to the community it serves, integrate these themes into your decision-making, and commit to a cleanup that is permanent, comprehensive, and just.

Thank you for your time and for considering this summary as part of the public record.

Sincerely,
Jon Hamilton
Port Angeles, WA

Hanan, Karen

Date: 8/2/25
Method: Website
Comment: See below.

A Call for Complete Remediation at the Former Rayonier Mill Site

To the Washington State Department of Ecology

The future of the former Rayonier mill site in Port Angeles demands nothing less than a comprehensive and permanent environmental cleanup. As an evolving community, Port Angeles's economic and community vitality are intrinsically linked to the complete remediation of this crucial waterfront area. Only a full cleanup can definitively resolve the site's persistent contamination and its related environmental, economic, and community problems.

It is imperative to acknowledge that the responsibility for this full cleanup lies squarely with Rayonier. For years, the company enjoyed significant prosperity as a direct result of the mill's operations in Port Angeles. This history of profitability, however, came at a severe environmental cost, leaving behind a legacy of pollution that continues to harm the community and its natural resources. Given their past gains and the scale of the damage inflicted, Rayonier, with the Department of Ecology's oversight, has a profound moral, ethical, and legal obligation to ensure a complete and thorough remediation of the site.

For decades, the mill's operations resulted in severe environmental degradation. The vital salt marsh, which served as an essential estuary for Ennis Creek fish, was egregiously paved over, and Ennis Creek itself was straightened and narrowed. This directly impacted critical salmon spawning grounds, leading to the washout of gravel, eggs, and young fry into the harbor. Furthermore, over 4,000 timber pilings continue to leach creosote, a known toxic substance containing polycyclic aromatic hydrocarbons (PAHs), into the harbor's shoreline waters and bay floor. These contaminants pose ongoing, unacceptable risks to marine ecosystems and human health.

Beyond the immediate local impact on Port Angeles, the full cleanup holds profound environmental importance for the entire Olympic Peninsula. The health of the Port Angeles Harbor is interconnected with the broader Salish Sea ecosystem, a vital regional resource. The removal of these persistent pollutants will contribute significantly to regional ecological recovery, enhance biodiversity, and support the health of a globally significant marine environment.

Moreover, the land on which the mill was built holds immense cultural significance for the Lower Elwha Klallam Tribe. This site is part of their ancestral lands, and the complete

restoration of the natural environment is crucial for the preservation of their cultural heritage, traditional practices, and the spiritual connection to their land and waters. A truly clean site respects this deep cultural tie and supports the Tribe's ongoing efforts to restore their ancestral resources, including the recently re-established salmon runs on the Elwha River.

Current proposals for partial cleanup, such as “SL3,” which suggests merely capping and fencing off a contaminated 10-acre area with 30 years of monitoring, are fundamentally inadequate. Such an approach does not remove the contaminants but merely covers them, leaving the potential for future release due to natural events like erosion or seismic activity, and creating a perpetual environmental liability for the community. This is not merely a compromise; it is a false economy that defers true remediation and perpetuates risk. A capped site would also severely constrain any future development, physically and legally limiting the potential for the waterfront. The true costs of such a limited approach are significantly underestimated when considering long-term maintenance, monitoring, and the lost opportunities for the community.

In stark contrast, “SL5,” which advocates for a complete and permanent cleanup, represents the only viable path forward. This approach involves the full removal of all contaminants, ensuring that the site is truly healthy and safe for future generations. A complete cleanup aligns perfectly with the community's vision for the waterfront, as articulated in the new comprehensive plan. This plan reimagines the former heavy industrial zone as a vibrant mix of open space, recreation, walkable commercial areas, hospitality, housing, public facilities, and clean industries. Only with full remediation can this transformative vision be realized, unlocking the site's immense potential for economic revitalization and community well-being. The economic and community vitality of Port Angeles hinge in part on the successful transformation of this important waterfront parcel.

The overwhelming public sentiment, expressed in previous calls for input, has consistently favored complete contaminant removal. The Department of Ecology, as the state's lead environmental protection agency, bears the critical responsibility to oversee cleanup that prioritizes the long-term health of the environment and the community. While concerns about cost and logistical challenges for off-site disposal have been raised, these are surmountable. The long-term costs of inaction—including continued environmental degradation, public health risks, depressed property values, and lost economic opportunities—far outweigh the investment in a comprehensive cleanup.

Now is a critical time for the Department of Ecology to decisively implement SL5 and ensure a complete and permanent cleanup. This is essential to uphold environmental accountability, to honor the cultural heritage of the Lower Elwha Klallam Tribe, and to

transform this historically polluted site into a source of community pride, a healthy ecosystem, and a dynamic economic asset for decades to come.

Sincerely,

Karen J. Hanan
183 Peele Rd, Port Angeles WA 98363

Hare, Taresa

Date: 7/17/25
Method: Email
Comment: See below.

From: taresa@wavecable.com taresa@wavecable.com
Sent: Thursday, July 17, 2025 9:41 PM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Cc: warren.snyder@ryam.com; ECY RE SWRO Public Disclosure PublicDisclosureSWRO@ECY.WA.GOV
Subject: FW: dump site in Port Angeles

Good morning!

Unfortunately, I was not able to attend the recent Public Meeting for the Port Angeles Rayonier Mill site.

After reading through the Toxics Cleanup Program and the State Environmental Policy Act – Determination of Nonsignificance (funny name for something many seem VERY significant), I found it very interesting that the Rayonier dump site, located West of M Street located between 12th & 14th Streets, was not mentioned at all.

This site should definitely be included in the process of clean up and elimination of toxic waste that was generated by the Rayonier Mill. There are many families and residents that live in close proximity of that site. We all know what can happen when underground tanks leak and they do.

Is there a reason why this dump site was not included in this cleanup project? Could it be that it is tucked away from the eye of the public and tourists?

I am in the process of getting water and soil samples from the "run-off" located on the north side of that site. I am truly hoping that there will be no positive test results, as I have stated previously to you (below) that I live in this neighborhood. I could not find that you ever responded to my previous email.

I am hoping that this site has been overlooked and that it will be considered for cleanup and removal, as well. Please provide an update on the status of monitoring and/or cleanup and removal of the Rayonier Mill dump site located West of M Street located between 12th & 14th Streets, in Port Angeles WA.

Thank you – Sincerely,

Taresa Hare

Hargis, Laurel

Date: 8/12/25
Method: Website
Comment: See below.

clean up option 5 is the only acceptable option!

Harksell, Scott

Date: 8/8/25
Method: Website
Comment: See below.

Having been a resident of Port Angeles for the nearly 10 years we often walk the trail along the waterfront. The former Rayonier site is located in what could be a beautiful site. With continued work along all of Washington's waterfront site this is an opportunity to really make a difference. I think the site should be completely devoid of toxic material so that full and complete use of the land can take place. A park, walking paths, living area (condo's) and restaurant site would be an awesome change for Port Angeles. Rayonier AM should pay for a complete cleanup. Option 5.

Thank you for your consideration.

Harper, Tom

Date: 8/9/25
Method: Website
Comment: See below.

Level 5 cleanup is the ONLY option that the Dept. of Ecology should consider for the former Rayonier Mill site in Port Angeles, WA.

Harrington, Madeleine

Date: 7/24/25
Method: Email
Comment: See below.

From: bluemnt@olympus.net bluemnt@olympus.net
Sent: Thursday, July 24, 2025 9:57 AM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Subject: Rayonier cleanup in Port Angeles

To Whom it May Concern:

We have lived, worked and raised our children and grandchildren in Port Angeles, bordering the pristine Olympic National Park.

I am writing to strongly oppose the decision of Ecology for only Level 3 cleanup of the Rainier site and harbor.

The humans, animals, fish and trees of our beautiful community deserve nothing less than complete cleanup of the toxic waste created by Rainier over many decades - level 5.

Thank you for your attention to this email.

Madeleine Harrington MD

Hartnett, Ann

Date: 8/2/25
Method: Website
Comment: See below.

As a Port Angeles resident and someone who regularly swims and hikes in and along the Elwha, I demand that Rainier be held accountable to completely clean up their mess under option 5 of the options presented during the special meeting at city hall.

Hatch, Julie

Date: 7/30/25
Method: Website
Comment: See below.

1. The proposed timeline for the remaining cleanup is unacceptably long. The Scott Paper Mill cleanup in Anacortes – same industry, similar contaminants - took about five years

from beginning to end. In 2000, an Ecology official told us the clean up would take four to six years. 25 years later we are given an estimate of an additional 10 years.

With all the studies and preparatory work already done, there is no technical reason the cleanup could not be completed in well under five years. Rayonier received an excellent financial deal from Ecology's forbearance, being able to postpone the $30 million cleanup cost by already 28 years. They should be informed now that the cleanup must proceed on an expedited schedule, or else Ecology will declare them unable to carry out the clean up as required and conduct the cleanup itself using funds from the Hazardous Substance Tax, pursuing recovery of the costs from Rayonier. The citizens of Port Angeles deserve no further delay in restoring the centerpiece of their waterfront

2. The upland cleanup timetable should not be tied to the marine cleanup if the latter takes longer, so that the land portion of the cleanup area can be sold by Rayonier and placed back into productive use as soon as possible.

3. The Natural Resource Damage Assessment (NRDA) process should not delay the cleanup, nor prevent Rayonier from being incentivized to eventually make the property available for productive use again. Any Ennis Creek related restoration projects should not delay the conclusion of the upland area cleanup.

4. And, importantly, Rayonier should not be incentivized to never sell the property by being offered NRDA credits with a value in excess of the property's market value once cleaned up, for ceding the property for a nature or cultural preserve. Ecology cannot force Rayonier to sell the cleaned-up property, but it can make certain that eventually selling it is in Rayonier's economic interest.

As a former board member of the Port Angeles Harbor Works Public Development Authority, I want to dispel the narrative that Harbor-Works failed because it was concluded that the Rayonier property would never have any commercially valuable use once cleaned up. This was not the case. The Rayonier property could be an important engine for the economy of the City of Port Angeles, with a tribal cultural center, such as proposed by the Jamestown S'Klallam Tribe, an Anthony's Restaurant, a marina, light marine industry, or many other alternative potential uses.

Harbor-Works failed because with the glacially slow pace of the cleanup and Ecology's inability or unwillingness to place pressure on Rayonier for a prompt cleanup, Rayonier had no incentive to make a deal that involved a quick cleanup. A dollar spent today is worth much more than a dollar spent 20 years from now. 16 years later, things have worked out exactly as Rayonier had hoped when Harbor-Works failed – it has not yet had to pay the $30

million for the cleanup and under the current schedule would not have to do so for many years to come.

I have lived in Port Angeles since 1988 and every time someone from Ecology speaks we see almost the same slides and hear the same story "another 7-10 years" I will likely be dead before it gets closure!!! PLEASE, take a stand for our community and demand that this is completely resolved (cleaned and ready for development) in the 5 years!!! Thank you

---

Hatten, Toyia

Date: 7/25/25
Method: Website
Comment: See below.

The only acceptable option for cleaning up the Rayonier mill site in Port Angeles is option 5, removing all contaminated materials from the site. The people and wildlife in this community (along with the body of water the mill is situated on) all deserve to have the property cleaned up completely.

Heselbach, Rae

Date: 8/12/25
Method: Website
Comment: See below.

As a resident of the area, I am stating that Ecology should hold Rayonier liable for a Level 5, complete clean up. They have plenty of income to afford it. The level 3 clean up is just burying toxic waste on site, not cleaning it up. Port Angeles, Ennis Creek, and all of us who live along the Salish Sea deserve a full and complete clean up.

Sincerely,

Rae Heselbach

Holt, Danielle

Date: 7/25/25
Method: Website
Comment: See below.

ALL contaminated materials must be removed. Do not leave toxic waste behind in an ecologically sensitive area. If the environment and local residents aren't reason enough,

consider this is in a location that could be used to great community benefit including increased tourism were it safe to use.

Hopson, Candice

Date: 8/11/25
Method: Website
Comment: See below.

I strongly support the level 5 option for cleanup, which will remove all environmental toxins.

Thank you,

Candice Hopson

Horn, Justin

Date: 8/9/25
Method: Website
Comment: See below.

Living in Port Angeles my entire life, it has always been disappointing to see massive chunks of land that could be utilized to the benefit of all just sit idle. The old Rainier mill site is no different. I believe all measures should be taken to fully clean this site of all previous contaminants so that this stretch of waterfront, with amazing potential, can be turned into something that will add to our already wonderful town for generations to come.

Hudson, Claire

Date: 8/10/25
Method: Website
Comment: See below.

I am writing as a concerned citizen and a member of the Port Angeles community to express my strong support for Alternative SL5 for the cleanup of the former Rayonier mill site. This is a critical issue for the long-term health of our community and the unique marine habitat of our waterfront.

The Port Angeles waterfront is a vital resource and a home to critical species, including our endangered Southern Resident killer whales, salmon, and migratory birds. The

contamination at the mill site, including PCBs, dioxin, and heavy metals, poses a significant and ongoing threat to this sensitive ecosystem.

Alternative SL3, which involves simply capping the site, is not a permanent solution. This temporary fix ignores the very real risks of sea-level rise, coastal erosion, earthquakes, and floods that could breach the cap and re-release pollutants into our waters.

A complete and permanent cleanup is long overdue. I urge you to select Alternative SL5, which involves the full removal of all contaminated soil. This is the only lasting solution that will truly protect our community and our environment for generations to come.

I believe the benefits of SL5 are vastly understated, and the costs of SL3 are not accurately estimated. The long-term health of our community is a benefit that cannot be measured in simple terms.

[Add a few sentences here about why the Port Angeles waterfront is important to you personally, or why you care about this issue.]

Please, for the sake of our community and our environment, choose Alternative SL5.

Sincerely,

Claire Hudson

Hueter, Tammy

Date: 8/8/25
Method: Website
Comment: See below.

I have recently become aware that Rayonier is responsible for the hiring of consultants who estimate the costs of preferred solutions and is overseen by the Department of Ecology (also known as the DOE).

I believe DOE to be negligent in their oversight of costs and benefits estimates.

The DOE informed us that SL3 had to be the choice because the cost-benefit ratio was too high, and this was “the law,” an RCW over which they had no control. The fact that the estimated costs have been minimized in SL3 and exaggerated in SL5 results in a differential of $27 million, which forces SL3 to be the preferred solution by the letter of the law.

After further examination of the cost estimates of SL3, several areas are underestimated and incomplete, for instance, permitting, design and modeling, maintenance, repairs, and monitoring (to be done by Rayonier), plus coordination with sediment work and potential

toxicity of untested sediments beneath the current dock as well as unknown protocols necessary for that remediation.

The benefits have been estimated too high and the costs too low for SL3.

How much will it cost when there is damage to the 10-acre capped toxic soil along the waterfront?

There's no modeling for loss of taxes, economic benefits, acts of God, along with sea level rise in these estimates.

SL-5 estimates are higher than expected. Engineering is not as complex, economy of scale, erroneous $75,000 restrictive covenant preparation cost included (which should not be there), and non-construction cost of $6.25 million higher than for SL3, which seems inaccurate as well.

For the benefit of Rayonier, future generations, and the restoration of the estuary and creek, the cleanup should be permanent.

SL5 is permanent and allows property reuse.

How is it possible that in these cost-benefit ratio estimates, there's no financial accounting for the fish, salmonids, and the estuary that is no longer available to them, yet essential to their survival?

SL3 is much more complex.

It involves fencing, signs to limit access, 30 years of post-construction monitoring, an environmental covenant, and a commitment to maintenance by Rayonier.

It should be easy to build, yet SL5 is underscored at 6, as excavation, loading, and transfer are well-known technologies.

On the other hand, SL3 has been over-scored at 9 with complex engineering for erosion-proof 7-foot (possibly more, depending on sediment findings) fenced 10-acre mound, considering sea level change, inclement weather, and an environmental covenant are the factors NOT being considered in this over-scoring of SL3.

Compliance with the Comprehensive Plan is not considered in estimates.

We need a PERMANENT resilient solution and consideration of modeling and repair challenges to design, construct, and maintain the consolidation area. The cost estimate must recognize that SL3 is more complex and will cost more than SL5 to design and maintain.

These discrepancies and oversights make it clear that SL5 is the actual correct choice of preferred solutions.

We request that SL5 be the preferred and permanent solution to this long-delayed toxic cleanup.

Huffstetler, John

Date: 8/8/25
Method: Website
Comment: See below.

Concerning the Port Angeles Rayonier Mill interim action plan, the document states in Tables 5-4 through 5-6 (pages 78-80) that alternatives SL-5, G-3, and S-5 scored highest by your own objective criteria. Only when costs are considered does the plan change to SL-3, G-1, and S-2. On interim action plan page 41 it states, "MTCA requires Ecology to select the most permanent alternative whose incremental cost is not disproportionate to the incremental benefit it would achieve compared to the lower cost alternatives." While I do not dispute the projected costs, I do not believe that all benefits have adequately been considered. There is no consideration of the following benefits: long-term benefits, projected profits from restored land and marine use, cultural benefit to the Lower Elwha Klallam Tribe, and many more. Even if some of these benefits were adequately considered, the highest scoring alternatives would rise to their rightful prominence. In short, the choice is not the best versus the most cost-effective. We are choosing less cost-effective options, because the benefits are being downplayed. Alternative SL-5, G-3, and S-5 not only have the highest benefits to my community, but over time the thoroughness of these cleanups will prove to be invaluable investments in the life, culture, and profits of Port Angeles. Please do not sacrifice our long-term benefits for short term cost considerations!

Huffstetler, John

Date: 8/11/25
Method: Website
Comment: See below.

In the current proposal, there is no current cost analysis of the threat of sea-level rise and/or tsunami on the planned soil cap. What happens if sea level rises above the cap? What happens if a tsunami big enough crashes in the cap? Your own documentation admits that caps only work if they are not eroded, and these events could seriously damage and erode the cap. And these risks are not hypotheticals. Sea level rise and a large

tsunami triggered by earthquakes from the Juan de Fuca plate are real threats that WA communities have been planning for for years. I support plan SL-5; full removal of soil and no cap. Please don't try to save a few bucks now only to end up with a costly cap disaster in the future.

Jacoby, Mary

Date: 8/11/25
Method: Email
Comment: See below.

I have been following the issue of the contamination left behind by Rayonier for decades! The current proposal described in SL-3 is totally unacceptable and a slap in the face to the residents of Port Angeles. SL-5 is the only responsible way forward and should be the only option considered. Do the right thing!

Respectfully,

Mary Jacoby
318 West 6th Street
Port Angeles, WA 98362

James, Rich on behalf of the Peninsula Trails Coalition

Date: 7/8/25
Method: Other
Comment: See the following two pages.

DEPARTMENT OF ECOLOGY
State of Washington

Please Write Clearly or Go Online:
go.ecology.wa.gov/comment2270

Public Comment Form

1 Comment | 2 Review | 3 Your Copy

Commenting open: **June 12, 2025 8:00 AM PT—August 12, 2025 11:59 PM PT.**

Port Angeles Rayonier Mill: Consent Decree, Draft Interim Action Plan, and SEPA Checklist & Determination of Non-significance

Please note that this comment form is for the purpose of submitting a comment to the Washington Department of Ecology. Commenter contact information is optional. Contact information is necessary if you want to receive future notices or responses related to this topic.

We would like your input on the following documents:

- **Consent Decree** – To move the cleanup forward, Ecology will enter into a legal agreement called a consent decree with the parties responsible for cleanup—Rayonier A.M. Properties LLC and Rayonier Advanced Materials (collectively referred to as "RAMP" or "Rayonier"). The consent decree is a legal agreement that would require RAMP to carry out Ecology's Interim Action Plan.
- **Draft Interim Action Plan** – Ecology's proposal of how to clean up the study area. It includes a schedule and cleanup requirements.
- **State Environmental Policy Act (SEPA) Determination of Non-Significance** – Based on an environmental checklist, Ecology has determined that the proposed cleanup is not likely to result in significant environmental impacts.

Scan the QR code to learn more about the cleanup or review documents.

Contact Information

All fields are optional unless otherwise indicated.

Submitted by: (Check one and write name)

☐ Individual (add name below) ☒ Organization: PENINSULA TRAILS COALITION

☐ Agency: _____ ☐ Other _____

☐ Business: _____

First Name: RICH

Last Name: JAMES

Address: 2813 E. BAY ST.

City/Town: PORT ANGELES, WA 98362

Country:

State/Province:

ZIP: 98362

Email:

Please write comment clearly on other side:

DEPARTMENT OF ECOLOGY
State of Washington

Please Write Clearly or Go Online:
go.ecology.wa.gov/comment2270

Public Comment Form

1 Comment | 2 Review | 3 Your Copy

Your Comment

Comments are due by August 12, 2025 at 11:59 p.m.
To make a comment, please enter your comment(s) in the text area. To submit attachments please visit Ecology's online comment form at https://go.ecology.wa.gov/comment2270.

Any information (e.g., personal or contact) you provide on this comment form or in an attachment may be publicly disclosed and posted on the Internet.

To submit comments for a group please visit our "Commenting Tips" webpage at https://ecology.wa.gov/About-us/Get-involved/Public-input-events/Commenting-tips

Next Steps: After the close of the comment period, Ecology will review and consider all comments received as we finalize the documents and respond accordingly.

THE PENINSULA TRAILS COALITION IS CONCERNED ABOUT EXTENDED SHUTDOWNS OF THE OLYMPIC DISCOVERY TRAIL AS IT TRAVELS THROUGH THE RAYONIER SITE. THIS SECTION OF TRAIL IS UTILIZED BY BICYCLISTS & WALKERS WITH A YEARLY TRIP COUNT OF OVER 300,000. IT IS THE TRAIL SECTION THAT SEES THE HEAVIEST USE AND IS EQUIVALENT TO US 101 IN IMPORTANCE TO BICYCLISTS TRAVEL. THE ONLY ALTERNATIVE ROUTE IS THE DANGEROUS US 101 ROUTE WITH HEAVY TRAFFIC & NARROW SHOULDERS.

MOST OF THE CURRENT ROUTE IS PAVED THROUGH THE SITE SO ANY CONTAMINATION IS ALREADY CAPPED. PTC HOPES THE TRAIL WILL REMAIN OPEN DURING CLEANUP AND THAT BICYCLE/PED ACCESS IS MAINTAINED EVEN AT EQUIPMENT ACCESS POINTS.

RICH JAMES
PTC PRESIDENT
RICHJAMES@JMO.COM

DEPARTMENT OF ECOLOGY
State of Washington

Abby Zabrodsky, Public Involvement Coordinator
564-250-0561
Abby.Zabrodsky@ecy.wa.gov
Accessibility: https://ecology.wa.gov/About-us/Accountability-transparency/Our-website/Accessibility

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Jellicoe Pressley, Katherine

Date: 8/8/25
Method: Website
Comment: See below.

As a lifelong student and proponent of sustainable environmental practices and as a transplanted Canadian familiar with Love Canal, the Great Lakes, I am requesting a complete, timely, and high-quality cleanup of the Rayonier Mill Site, urging the Washington Department of Ecology to select alternative five (SL-5). This land was contaminated eliminating the possibility of the commuunity enjoying and profiting from this incredible space. It needs to be restored to its original pristine state so all inhabitants and visitors may benefit safely and for perpetuity.

Johnson, Kelly

Date: 7/24/25
Method: Email
Comment: See below.

From: Kelly Johnson kellyjohnson@olypen.com
Sent: Thursday, July 24, 2025 12:37 PM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Cc: council@cityofpa.us; 'Calvin Goings' Cgoings@cityofpa.us; 'Nathan West' Nwest@cityofpa.us; Chapman, Mike (LEG) mike.chapman@leg.wa.gov; Bernbaum, Adam (LEG) Adam.Bernbaum@leg.wa.gov; Tharinger, Steve Steve.Tharinger@leg.wa.gov; randy.johnson@clallamcountywa.gov; Todd.Mielke@ClallamCountyWA.gov
Subject: SL5 Is the Only Responsible Path Forward for Rayonier Cleanup

To the Washington State Department of Ecology,

The time for half-measures is over. The Rayonier Mill site in Port Angeles has languished in a state of contamination and deferred accountability for decades. SL3 is not an acceptable solution—it's a temporary fix masquerading as progress.

At this week's special Port Angeles City Council meeting, residents, environmental experts, and community advocates spoke with remarkable unity: SL5 is the only viable path forward. SL3 proposes capping a contaminated 10-acre area, elevating the soil, fencing it off, and committing to thirty years of monitoring. This is containment—not remediation. Under SL3, development would be severely limited by physical constraints and long-term regulatory burdens, thwarting our Shoreline Master Plan and compromising public safety.

Moreover, it appears SL3's costs have been underestimated while SL5's have been inflated, downplaying its long-term value. SL5 would remove significantly more contaminated material and allow for unrestricted use of the land in alignment with modern urban planning standards and environmental justice goals.

Let's be honest about what's at stake. Although Rayonier is still zoned for heavy industrial use, our new Comprehensive Plan reimagines this waterfront as a vibrant mix of public space, recreation, commercial opportunity, clean industry, residential living, and ecological restoration. SL3 would strand this vision in bureaucratic purgatory. SL5, by contrast, opens the door to meaningful redevelopment—one that reflects the hopes and priorities of our community.

We urge the Department of Ecology to recognize the weight of this moment and reject SL3. Anything less than SL5 undermines environmental integrity and ignores the people of Port Angeles who are demanding a full and permanent cleanup.

Choose restoration. Choose accountability. Choose SL5.

Sincerely,

Kelly Johnson

226 W. 2nd Street, # 7
Port Angeles, WA 98362
PH# 360-477-5876

Johnson, Kelly on behalf of the Port Angeles Business Association

Date: 8/1/25
Method: Email
Comment: See the following five pages.

July 29th, 2025

Public Comment on Rayonier Mill Cleanup

Attention: Marian Abbett, Washington State Department of Ecology

The Port Angeles Business Association, with over 80 members, has as its goal the promotion of healthy, vibrant economic growth in Port Angeles and Clallam County. Please find following our comments on the Rayonier Draft Interim Action Plan.

1. The proposed timeline for the remaining cleanup is unacceptably long. The Scott Paper Mill cleanup in Anacortes – same industry, similar contaminants - took about five years from beginning to end. In 2000, an Ecology official told us the clean-up would take another four to six years. 25 years later Ecology is giving us estimate of up to an additional 10 years.

With all the studies and preparatory work already done, there is no technical reason the cleanup could not be completed in well under five years. Rayonier so far has fulfilled all of its legal responsibilities with respect to the clean-up, and the Action Plan should not be punitive towards Rayonier. However, Rayonier received an excellent financial deal from Ecology's forbearance, being able to postpone the bulk of the cleanup cost by already 28 years.

Rayonier should be informed now that the cleanup must proceed on an expedited schedule, or else Ecology will declare them noncompliant and conduct the cleanup itself using funds from the Hazardous Substance Tax, pursuing recovery of the costs from Rayonier. The citizens of Port Angeles deserve no further delay in restoring this important part of their waterfront.

2. The upland cleanup timetable should not be tied to the marine cleanup if the latter takes longer, so that the land portion of the cleanup area can be sold by Rayonier and placed back into productive use as soon as possible.

3. The Natural Resource Damage Assessment (NRDA) process should not delay the cleanup, nor prevent Rayonier from being incentivized to eventually make the property available for productive use again. Any Ennis Creek related restoration projects should not delay the conclusion of the upland area cleanup.

4. Importantly, Rayonier should not be incentivized to never sell the property by being offered NRDA credits with a value in excess of the property's market value once cleaned up, for ceding the property for a nature or cultural preserve. Ecology cannot force Rayonier to sell the cleaned-up property, but it can make certain that eventually selling it is in Rayonier's economic interest.

5. We favor the SL5 option for the cleanup. Capping 10 acres of the site, fencing it off, and monitoring it for decades, as SL3 would require, would make any sale of the property and future development extremely difficult, if not impossible, particularly if Ecology needs to approve any construction on that site.

We believe that the full costs of option SL3 may have been underestimated and those of SL5 inflated. Furthermore, the range of future uses possible under option SL5 aligns far better with the City of Port Angeles's Comprehensive Plan and future zoning designations for the Rayonier property.

We believe that on the Rayonier site there is room for conservation, such as restoration of Ennis Creek, public access and recreation, as well as productive use resulting in the jobs, housing, and tax revenues so needed by our community.

Thank you for your consideration.

Sincerely,

Kelly Johnson

President, Port Angeles Business Association

From: Kelly Johnson <kellyjohnson@olypen.com>
Sent: Friday, August 1, 2025 11:28 AM
To: Abbett, Marian L. (ECY) <MABB461@ECY.WA.GOV>
Cc: council@cityofpa.us; 'Calvin Goings' <Cgoings@cityofpa.us>; 'Nathan West' <Nwest@cityofpa.us>; Chapman, Mike (LEG) <mike.chapman@leg.wa.gov>; Bernbaum, Adam (LEG) <Adam.Bernbaum@leg.wa.gov>; Tharinger, Steve <Steve.Tharinger@leg.wa.gov>; randy.johnson@clallamcountywa.gov; Todd.Mielke@ClallamCountyWA.gov; Jarkiewicz, Paul (Port Angeles) <paulj@portofpa.com>; matt.beirne@elwha.org; 'Frances Charles' <Frances.Charles@elwha.org>; ahlburgkaj@gmail.com; 'Robbie Mantooth' <ennis@olypen.com>
Subject: Port Angeles Business Association Public Comment for the Rayonier Mill Cleanup

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Public Comment on Rayonier Mill Cleanup

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Thank you for your consideration.

Sincerely,

Kelly Johnson

President

Port Angeles Business Association | PO Box 545, Port Angeles, WA 98362 | www.paba.org

Johnson, Wendy Rae

Date: 8/3/25
Method: Website
Comment: See below.

I have recently become aware that Rayonier is responsible for the hiring of consultants who estimate the costs of preferred solutions and is overseen by the Department of Ecology (also known as the DOE).

I believe DOE to be negligent in their oversight of costs and benefits estimates.

The DOE informed us that SL3 had to be the choice because the cost-benefit ratio was too high, and this was “the law,” an RCW over which they had no control. The fact that the estimated costs have been minimized in SL3 and exaggerated in SL5 results in a differential of $27 million, which forces SL3 to be the preferred solution by the letter of the law.

After further examination of the cost estimates of SL3, several areas are underestimated and incomplete, for instance, permitting, design and modeling, maintenance, repairs, and monitoring (to be done by Rayonier), plus coordination with sediment work and potential toxicity of untested sediments beneath the current dock as well as unknown protocols necessary for that remediation.

The benefits have been estimated too high and the costs too low for SL3.

How much will it cost when there is damage to the 10-acre capped toxic soil along the waterfront?

There's no modeling for loss of taxes, economic benefits, acts of God, along with sea level rise in these estimates.

SL-5 estimates are higher than expected. Engineering is not as complex, economy of scale, erroneous $75,000 restrictive covenant preparation cost included (which should not be there), and non-construction cost of $6.25 million higher than for SL3, which seems inaccurate as well.

For the benefit of Rayonier, future generations, and the restoration of the estuary and creek, the cleanup should be permanent.

SL5 is permanent and allows property reuse.

How is it possible that in these cost-benefit ratio estimates, there's no financial accounting for the fish, salmonids, and the estuary that is no longer available to them, yet essential to their survival?

SL3 is much more complex.

It involves fencing, signs to limit access, 30 years of post-construction monitoring, an environmental covenant, and a commitment to maintenance by Rayonier.

It should be easy to build, yet SL5 is underscored at 6, as excavation, loading, and transfer are well-known technologies.

On the other hand, SL3 has been over-scored at 9 with complex engineering for erosion-proof 7-foot (possibly more, depending on sediment findings) fenced 10-acre mound, considering sea level change, inclement weather, and an environmental covenant are the factors NOT being considered in this over-scoring of SL3.

Compliance with the Comprehensive Plan is not considered in estimates.

We need a PERMANENT resilient solution and consideration of modeling and repair challenges to design, construct, and maintain the consolidation area. The cost estimate must recognize that SL3 is more complex and will cost more than SL5 to design and maintain.

These discrepancies and oversights make it clear that SL5 is the actual correct choice of preferred solutions.

We request that SL5 be the preferred and permanent solution to this long-delayed toxic cleanup.

Jonak, Juliet

Date: 8/8/25
Method: Website
Comment: See below.

It is shocking that cleanup will have take over four decades with this proposal, and “clean up” isn't even the correct term when it's solely being packaged up for a future Port Angeles to deal with down the line.

Rayonier caused this problem and real harm to this community. They are responsible for a full and proper clean up that allows for a mixed use site at the end of the project. Port Angeles needs more mixed use space in our prime areas by the water. Our habitat deserves to have all hazardous and harmful material fully removed, not solely sealed up as is.

Corporations and Ecology must be held accountable, especially where small rural communities are being taken advantage of, harmed and deserted. This plan is not sufficient in its steps and should not proceed until improved.

Kale, Patrick

Date: 8/11/25
Method: Email
Comment: See below.

I support the permanent solution of Alternative SL-5 for contaminated soil and sediment at the former Rayonier Mill site in Port Angeles, WA. Proposed Alternative SL-3, leaving contaminated soil in place forever in a capped mound which will greatly limit future development, is unacceptable.

Kathol, Candace

Date: 8/11/25
Method: Website
Comment: See below.

I have been a Port Angeles resident for 51 years, I encourage the DOE to require Rayonier to clean up the harbor, soil, and groundwater to the highest level possible with current technology which would be Option 5. Rayonier polluted the Port Angeles harbor for far too long and DOE has been seriously delinquent in requiring Rayonier to clean up the harbor. The creosote pilings should have been removed back in the late 1990's. We know the pilings continue to pollute! Our harbor is a rare asset which the local residents deserve to have back in as clean a manner as possible. i recognize quite a bit of the damaging pollution cannot be undone. However, Rayonier has had all these years to invest their millions so the difference between option SL3 and SL5 which Rayonier has kept their $$ in the bank, they could have earned quite a lot on not cleaning up the site since there was enough data showing contamination many year ago. The land is private and zoned industrial, I get that, but the eventual earthquakes will possibly allow the contaminated soil to end up back in the harbor. This is the community's harbor and Rayonier needs to do the right thing and clean up and truck the contaminated soil off site to a hazardous waste disposal site that isn't near our harbor where we fish and crab! I thank DOE for all the work to monitor and summarize the data, now lets get this ordered to be cleaned up so the community can be proud of what we are leaving to future generations! DOE should be protective of future generations, not protective of corporations above the environment. Thank you,

Kellendy, Lev

Date: 7/31/25
Method: Website
Comment: See below.

Support Alternative 5 (complete removal of contaminated soil and sediment).

Please consider long-term environmental and health impacts—not just cost.

We demand protection for fishing rights, salmon habitat, and marine ecosystems.

We reject capping contamination and leaving it to future generations.

Please prioritize restoration of Ennis Creek and natural shorelines.

Even decisions in Port Angeles might impact outcomes in Tacoma.

Kellogg-Kilmer, Cecilia

Date: 8/12/25
Method: Website
Comment: See below.

Continue the cleaning! Cannot ignore the impact the toxic chemicals have had, and continue to have! Must continue to clean the area where the Rayonier Pulp mill operated. Educate the public about the effects of the leached chemicals upon the health of all living organisms in the area. Thanks for all you do already and continue to do!

Kelly, Chrissy

Date: 8/8/25
Method: Website
Comment: See below.

Our licensed childcare center, Comfort and Cozy Learning Center has sat above the site for over 25 years. We serve 36 families daily ages 1-5yrs old. We have seen the constant deterioration of the property and deal with its current habitats daily. Many years ago we could walk our young students down the giant hill for a nature walk, now we have to rush them inside often to avoid transient interactions and incidents. We have parents inquire regularly about the site and if it is toxic, our answer is to ask the city as we have never been notified one way or the other. We would love for the area to be clean of toxic waste and lifestyles as to ensure a safer healthier environment for our young students to grow in. Maybe even safe enough for a nature walk.

Kendall, John

Date: 8/3/25
Method: Email
Comment: See below.

From: kendalls@olypen.com kendalls@olypen.com
Sent: Sunday, August 3, 2025 2:00 PM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Subject: Rayonier mill site cleanup

Re: necessary cleanup of the former Rayonier mill site in Port Angeles harbor.

The state Department of Ecology needs to be sure Option 5 is implemented — and enforced. The result will be a cleaner harbor — great for the marine life, tourism and possible development. Also, much volunteer work has brought Ennis Creek back to life; now the mill site needs to be restored so the creek's estuary is clean as well.

It is telling that no representatives from Rayonier were present at any hearings or public discussions and presentations. The state Department of Ecology must press for Option 5 because Rayonier continues to show no interest in being responsible stewards of the abandoned mill site from which it profited from for many years.

Strive for Option 5.

John Kendall

Kicklighter, Wayne

Date: 8/11/25
Method: Website
Comment: See below.

Top 10 Reasons I Hate the Rayonier Mill Cleanup Project

I had little familiarity with the Rayonier Mill Cleanup project until the public meeting a month ago. But I found myself subsequently going down various rabbit holes to try to better understand the MTCA process, current project status, and future plans for the project. I chose to focus on the marine portion of the project since everyone else I heard at the public meeting seemed focused on the upland portion of it. So most of my comments are related to the contents of the Interim Action Plan (IAP) and associated Marine Data Summary Report, focusing on the basic foundation of what got us to where we appear to be now and where's this thing going. I suspect that many of the types of

comments I have on the marine portion of the project may be similar to concerns others have regarding upland and groundwater remediation including public involvement, outdated site characterization, questionable cleanup criteria, and ludicrous plans to basically leave all the contamination on-site. So without further ado.

1. **Public Meeting.** I was pretty surprised when I started reviewing the IAP and associated documents to see that the plan was not near as straightforward as indicated in Ecology's presentations. Some of this could obviously be written off to having limited time and an audience with unknown familiarity with the project history or technical concepts/jargon. But it also resulted in a false impression of the level of remaining uncertainty and wiggle room around remediation plans after 2-3 decades of development. For the marine sediment plans, probably the biggest examples of this were that

    a. Ecology did not indicate that 'no-action' was one of the alternatives still under consideration for SMA-3 and SMA-4. The IAP explicitly presents 'no action' as an ongoing alternative.

    b. Ecology indicated that a thin-layer cap was not really a consideration for any of the marine areas and that all marine remediation would likely either consist of EMNR or dredging/excavation. The IAP explicitly presents the thin-layer cap alternative as an ongoing alternative, and maybe even a likely alternative pending further modeling.

    c. Ecology indicated that contaminated soils would likely be permanently stockpiled on-site and contaminated sediments would be transported offsite. The IAP clearly presents permanent on-site stockpiling (consolidation) as the intended strategy although it left the door open for some off-site transport.

    Since the public meeting occurred months after the IAP was issued, I wanted to believe that these additional protective steps were refinements to the plan outlined in the IAP, but I suspect that hopeful assumption would be foolish. Also, the Ecology representatives giving the presentations didn't really convey interest in public engagement as the presenters largely just stared at their computers reading their pre-written speeches in a mono-tone voice. But I'll acknowledge 3-4 Ecology representatives enthusiastically expressed how excited they were to get public comments, and then during the Q&A session, Ecology didn't come close to answering the questions asked (most of which I could have answered more completely after only 20 minutes of looking at

Ecology's posters just outside the auditorium [kudos to the Ecology rep running around the audience with the microphone for trying to get his coworkers to actually answer the questions asked]). And I left the meeting after 4-5 questions went unanswered as the Q&A session began to quickly degenerate to audience members yelling out questions, frustrated comments, or just yelling. The whole experience came across as a box-checking exercise on the part of Ecology where they had no interest in public engagement, comment, or, dare I say, decision-making. But Ecology has presumably now gone through the motions to fulfill their MTCA 'public' responsibility. I hope this wasn't representative of other MTCA processes.

2. **Outdated Sediment Chemistry.** Ecology's presentations conveyed that extensive sediment chemistry sampling had been conducted to support the IAP, but there was no hint that those studies were collected 17 to 28 years ago. So those results (and thus the current plans) may or may not represent the current chemicals of concern, or their locations, depths, or concentrations. Also, many, if not most, of the sediment chemistry samples for this Site did not include all of the 47 SMS benthic analytes, or at appropriate detection limits for many of the analyses that were conducted. Thus, it is not clear what all locations may have exceeded Washington standards at the time they were sampled, much less 2 decades later. As a result, the concentrations in some area may have gone down (e.g., natural attenuation, dilution, volatilization) while surface contaminant levels in other locations may now be higher (e.g., hydrodynamics resulting in exposure of previously subsurface contaminants or lateral transport from adjacent hot spots). Thus, any proposed remediation should be based on current sediment conditions and/or implement more extensive remediation to address the uncertainty.

3. **What is Going On With 'Total TEQ?"** The IAP and accompanying Marine Data Summary Report do a pretty good job of presenting text, maps, and chemical data summary tables to support the extent and concentrations of project SMS chemical exceedances with one glaring exception ("Total TEQ"). The IAP only mentions the term 'Total TEQ" four times in passing and the 246-page marine report that was prepared to support the IAP does not mention the term a single time. According to the IAP, the Total TEQ is the combined 'toxicity equivalency quotient' for PCBs and dioxins/furans, and indicates the rationale for using 'Total TEQ' is explained in an 2016 Ecology memo (which does not appear to be available in the Port Angeles library or a Google search). So the IAP presents no information on the basis or implications of its use on this project, nor any info on the potential extent, depth, or

concentrations of Total DEQ across the marine habitat. However, the marine report does extensively discuss the individual PCB TEQs and dioxin/furan TEQs in marine sediments ('TEQ' is mentioned over 150 times in the document). Based on the extremely superficial info in the IAP on the topic, it appears that the Total TEQ may consist of simply adding the PCB TEQ and dioxin/furan TEQ together. Thus, the use of a Total TEQ cleanup level would mathematically be much less protective for human health and the environment than using an individual PCB TEQ plus a dioxin/furan TEQ. The reason for going so far down this TEQ rabbit hole is that PCBs and dioxins are more toxic and persistent than most if not all of the other sediment contaminants, and the sparse context on the Total TEQ concept in the IAP makes it impossible to assess whether the use of Total TEQ is more or less protective of human health and the environment. But it appears to be less protective, and possibly much less so, based on the limited info provided.

a. PCBs and dioxins are the most prevalent, persistent, and toxic contaminants identified in the marine area.

b. There were more PCBs exceedances than any other SCO chemical in the marine environment (according to the marine report based on Total PCB concentrations). PCBs were detected in every single surface and subsurface sediment sample analyzed.

c. Dioxins/furans were also measured in all surface and subsurface sediment samples analyzed with the maximum concentration being 5 to 10 times higher in both surface and subsurface sediments than the proposed Total TEQ criteria.

d. While neither the IAP nor marine report present any text, maps, or data tables of the extent and magnitude of Total TEQ exceedances at the Site, Ecology did show a map of Total TEQ exceedances in the July 8 public meeting. This map depicted Total TEQ exceedances approximately 2-4 times the proposed cleanup criteria beyond the Mill Dock (both north and east) and in the Log Pond area beyond where dredging is currently being proposed. That is, based on Ecology's stated approach to determining appropriate remediation methods, dredging should be expanded to include the Total TEQ exceedance footprint north of the proposed dredging in the Log Pond and north and east of the Mill Dock. While it is not at all clear why Total TEQ was slipped into the remediation approach at such a late date, it seems these contaminants should warrant the most attention in assessing risks and

determining appropriate remediation in the marine area, but the IAP seems to give them the least attention or at least the least clarity.

4. **Over-Remediate based on Worst-Case.** Based on the outdated sediment chemistry data and the uncertainty of what may have subsequently happened to the contaminants during hundreds of subsequent storms and 10,000 tidal cycles since they were collected, the choice of remediation alternatives and the extent of those alternatives should be based on the worst-case of what may have reasonably happened to those contaminants over the past 2-3 decades. Thus, if sediment chemistry results indicated 100 yards of intertidal shoreline should be dredged, it is necessary to technically evaluate whether the actual remediation area should be 150 or even 300 yards wide (or more). This should also consider potential erosion/exposure of 'subsurface' contaminants, continued upland inputs (there will be continued inputs from upland for decades if not centuries to come), potential sea-level rise changing where the intertidal zone is located (vertically and horizontally), and what intertidal and subtidal areas may become erosive in the future. Also, it seems there should be EMNR buffers (or thin-layer cap) around all dredging areas to account for mobilization of contaminants during dredging/excavation (e.g., currently there is no remediation proposed immediately west/northwest of the proposed dredging in SMA-2 nor east of potential dredging in SMA-4). Lastly, it seems like a no-brainer but Ecology should implement EMNR or thin-layer capping at all subtidal dredging sites (post-dredging) since dredging will not eliminate all contaminants in those areas but it will remove the surface habitat, potentially expose additional chemicals on the new 'surface," and otherwise create a pit.

5. **Dredging the Mill Dock Area is a Slam-Dunk.** It appears the basic process for moving forward in SMA-3 and SMA-4 is to collect future sediment chemistry samples prestructure removal, conduct hydrodynamic modeling of post-structure removal erosion, remove the Mill Dock/pilings and jetty, fill the ship berths with clean sediment, and implement currently undefined remedial activities under the Mill Dock (SMA-3) and Nearshore Areas (SMA-4). And that the future remediation in those areas may include no-action, EMNR, thin-layer cap, and/or dredging/excavation based on the location, depth, and extent of SCO exceedances (or more accurately 1.5x-3x SCOs). I'll pick on the sediment sampling first. The IAP text presents the approximate number, location, total depth, and depth intervals for both physical parameter testing and chemistry analyses (including a long list of analytes) for subsurface sediment sampling under the Mill Dock (SMA-3). The text

curiously mentions only that surface sediment sampling will be done (no indication of approximate sample number, location, depth, or analytes). I suspect that there was corresponding text on the surface sediment approach in an earlier draft of the IAP, but it was inadvertently deleted. Similarly, no text is included on the number, location or analytes of any sediment sampling in any of SMA-4. But for the sake of keeping this moving, I'll assume the approximate sample numbers, locations, and analytes for surface sediment samples under the Mill Dock will be identical or similar to the subsurface approach for that area, and that a similar approach will be used for the Nearshore Areas (SMA-4). So I'll highlight that only collecting surface and subsurface sediments at 8 locations for SMA-3 and even worse in SMA-4 will not be adequate to reasonably support specific remediation alternatives (although dredging would obviously be easiest to justify with little spatially-meaningful data). I'll also highlight that the dock is basically the bulls-eye of significant exceedances of many of the criteria contaminants including cPAH TEQ and Total TEQ (and both PCB TEQ and dioxin/furan TEQ). Also, the collection of chemistry results under the Mill Dock only before piling removal will provide a hugely inaccurate characterization of post-removal contaminant concentrations, depths, and extent since the physical removal of 4,000 creosote-soaked pilings will not only smear petroleum hydrocarbons throughout the depth profile and to the surface, it will also provide a ready pathway for other contaminants to migrate both up and down in 4,000 locations within this area. This also highlights that only sampling to a maximum depth of 8 feet in this area is probably not valid unless you basically don't care what contaminants are deeper. So chemistry sampling and hydrodynamic conditions/modeling should also be thoroughly conducted post-structure removal with the extent of sampling being expanded beyond the Miil Dock and former ship berths depending on refined post-removal hydrodynamic monitoring/modeling. And the sediment chemistry analyte list should comprehensively align with all the benthic and human-health SCOs (e.g., adding phenols, phthalates, and alpha-BHC). With all that said, I'm shocked that Ecology is not already proposing dredging to the Mill Dock (SMA3) since there is no other valid alternative to address the wide range and extreme concentrations of contaminants already documented at and around the site, which will be spread even further vertically and horizontally during and potentially following piling removal (which makes the lack of any further public transparency even more disconcerting).

6. **On-site Consolidation is Ludicrous.** It sounds like most public discussion about permanently excavated contaminants on-site focused on legal MTCA terms like 'practicable' and 'disproportionate.' While I probably agree with the rest of the

public's concerns about Ecology's hiding behind those highly subjective concepts, I'll comment on simpler terms like 'cleanup' or 'permanent.' My understanding is that Ecology's 'permanent solution' to cleaning up the contaminants at the Rayonier Mill site is just to basically pile all of the 128,000 cubic yards of hazardous material on the existing contaminated(?) soil on the west end of the site, cover it with a layer of rocks and dirt and claim permanent success (kids, go clean ¾ of the backyard and just leave all the dog turds in a layer in the remaining ¼ of the yard. Just kick some dirt on it. It will be fine). OK, more usefully, this concept seems ludicrous as it is not a permanent solution.

a. The consolidation area would apparently not have an impermeable layer below it (lining) or an impermeable cap above it (clay, blue tarp) so rainfall will continue to drain through the clean dirt, clean rocks, and 5+ feet of contamination.

b. The IAP seems to indicate that less-protective cleanup standards and permanently stockpiling 128,000 cubic yards of contamination on-site are in line with the industrial nature of the site. The only reason that the site still has an industrial nature is because it's been a vacant hazardous waste site for the past 2 decades. There is no adjacent industry and apparently no plans for it. I suspect that virtually everyone that calls Clallam County home would prefer the site be cleaned up in its entirely and the land use be improved to residential, commercial, and/or (preferably) publicly accessible open space in line with the adjacent land uses.

c. The IAP indicates that cleanup doesn't need to address leaching from contamination to the groundwater, which sounds crazy since virtually all the current contamination has apparently leached/leaked/seeped/percolated/drained/flowed/oozed from the surface through subsurface soils to the groundwater across the entire site. And it will continue to do so from those soils whether the soil remains in its current location or maybe even more so if it is moved, aerated, and mixed with other contaminants.

d. That doesn't even begin to address disturbance of the stockpile from seismic activity, sea level rise, or climate change. Not only are all these events reasonably foreseeable, they will definitely occur. With a major earthquake, not only could the consolidation pile liquefy but much of the Rayonier site could as well since it is composed of fill material dumped into the ocean over the past century. Tsunamis will occur and they won't need to be very tall to impact the consolidation pile as it appears it is proposed only be a few

feet above the current high tide line. Sea level rise and increased storm events in the future will alter the shoreline, and raise the groundwater levels, which will encroach on a consolidation pile located '200 feet' from the current shoreline.

So it is a misnomer to call the IAP a cleanup plan, much less a permanent solution since it is simply rearranging the deck chairs.

7. **Consolidation of Marine Contaminants is Even More Ludicrous.** As previously mentioned, Ecology stated at the public meeting that contaminated sediments will be transported off-site, but the IAP does not. Much if not all of the criticism in #6 above for consolidation in general would be exacerbated if the consolidation pile includes contaminated marine sediments. Dredging of marine sediments is accomplished by creating a slurry to remove the sediments from the benthic habitat and transport it for disposal via barge, truck, or just piling upland. While some dredging and dredge spoil removal methods create more liquid slurry than other methods, it would seem that this currently proposed project would include piping the toxic dredge spoils to land, which tends to liquefy the dredge spoils more than other dredging methods. As such, this toxic slurry needs to be contained and confined from spreading out and down. Thus, dredged sediments would likely be significantly even worse candidates for upland stockpiling than upland soils, and even more so without impermeable linings beneath the pile, containment berms around the pile, an impermeable cover on top of the contaminants, or possibly binding agents to try to solidify the slurry or otherwise make the toxins inert.
8. **Long-Term Monitoring.** Obviously the biggest concern is that comprehensive construction, performance, and confirmational monitoring will actually be conducted in an appropriate manner and on an appropriate schedule. There are a lot of reassuring, albeit generic, words in the IAP but not much commitment, and this is further exacerbated by the fact that the pending monitoring plans, and their implementation will apparently be conducted outside public view (No, trust us). Long-term monitoring is probably a much bigger concern for upland and groundwater remediation than marine sediments, or at least subtidal sediments. Although subtidal remediation and subsequent monitoring of marine sediments might be costly, it theoretically should be successful as long as updated site characterization is accurate and remediation activities are implemented appropriately. That isn't because I trust that dredging will completely remove all contaminants or that EMNR actually will accelerate 'natural" attenuation of the contaminants, but because Ecology has selected the subtidal point of compliance

to be only the upper 4 inches of the sediment. Almost all of the currently proposed marine subtidal remediation consists of covering the native surface sediments via EMNR, thinlayer cap, and ship berth filling. And hopefully Ecology adds post-dredging EMNR or thin-layer cap to the remaining subtidal dredge areas too to better protect human health and the environment. While the IAP repeatedly indicates that thin-layer capping may consist of adding 6-inches of new sediment, it curiously does not provide a depth for EMNR although federal guidance is apparently between 6 and 12 inches. Assuming the added sediment stays in place, this means that compliance monitoring of sediment chemistry in these areas will only sample the added clean sediment. Thus, remedial success would be achieved simply by adding the sediment and it hopefully staying in place independent of the remaining toxic concentrations in the native sediment below it in 10 years or even 10 centuries. And even if half of the SMA only had 2 inches of clean sediment remaining, that would presumably reduce the 'sediment-weighted average' by 75% even if the contaminant concentrations measured 2-3 decades ago were still present in 2030 or 2050 or beyond. That isn't to say that EMNR and thin-layer capping will consistently provide a layer over 4 inches deep or that long-term monitoring isn't warranted. It's to point out that Ecology has stacked the deck in their favor for achieving their definition of 'success' even in areas where no actual contaminant reduction occurs.

9. **Future Public Involvement.** It was very disappointing to hear that the July 8 meeting was basically the last chance in the Rayonier Mill cleanup process for the public to be allowed to be informed much less involved in future sediment sampling/modeling plans or results, identification and design of selected remediation alternatives, actual implementation, long-term monitoring plans/results, or planning or implementation schedules. This isn't just an issue with there not being any public review, but it is more disconcerting that the people most affected by these efforts may not know what is going on (or when) with the project until we actually see heavy equipment at the site (or maybe more likely, no evidence of heavy equipment for another 5 or 10+ years or more). There apparently will be an Ecology website that can be monitored to check on the project status, but it sounded like the information provided might be as simple as 'final remediation methods selected,' not what they were much less the rationale or implications to the public or our environment. I hope this isn't representative of other MTCA processes.

10. **Is MTCA Broken?** This is my first MTCA cleanup project, so I have no idea whether the Rayonier Mill Cleanup process and proposed project are representative of other MTCA projects, but it does not appear to be working as intended here. Taking 2-3 decades to get to the draft IAP stage should be an embarrassment to all involved (and if they are not embarrassed, they are obviously part of the problem). The overall process and current plans are in sharp contrast (violation?) of the mission of Ecology and the legislature's purpose in enacting MTCA. Ecology's stated mission is 'to protect, preserve, and enhance Washington's environment for current and future generations.' This proposed cleanup plan clearly does not satisfy that mission now or especially for future generations. The stated purpose of MTCA is to find a 'workable process to accomplish effective and expeditious cleanups in a manner that protects human health and the environment' and 'encourages public and tribal involvement in decision making.' I don't think anyone would consider the Rayonier Mill Cleanup project efficient and effective, and the large majority of the public would not consider it protective, permanent, or even ethically or morally right.

I understand there is a fairly new version of MTCA that newer cleanup projects must adhere to, and hopefully the updated version of MTCA addresses the challenges this project has encountered with adhering to schedules, public engagement, vagaries in language, and loopholes so the Rayonier travesty, especially the delays and the current consolidation plan, is not inflicted on other Washington communities now or for future generations.

Kidd, Cherie

Date: 7/23/25
Method: Website
Comment: See below.

I support the SL5 alternative. It is the ONLY FINAL SOLUTION to the ongoing toxic pollution in the City of Port Angeles on the Rayonier property. To pile up toxic materials into Ten Toxic Acres would be a perpetual problem left to our citizens. We have to restore Ennis Creek and make the property available for mixed-use development in the future.

Option SL3 is NOT a SOLUTION for our city. It is only continuing the off-putting of a final cleanup that our city has endured for the last 28 years. That property is prime property for economic development that has been lost to our community. Final Clean up - please remove all toxic soil SL5.

Kleveno, Zana

Date: 7/30/25
Method: Website
Comment: See below.

We are recently retired and new to the most beautiful state in the country. In order to keep it beautiful and healthy, we must be good stewards and protectors of the environment we hold dear. That is why I fully support option 5 as it pertains to the Rayonier pulp mill in Port Angeles. The negative effects on both nature and humans is long term and half measures will not suffice. Salmon is an integral part of our evergreen state and we take that charge very seriously. Keystone species have that name for a reason and we must protect them.Capping contamination is a gamble we cannot afford and a dangerous game of kicking the problem down the road. All peoples will be affected in the most adverse way if we, and you, the stewards and caretakers fail to do our jobs. Restoration, of Ennis Creek and the natural shorelines, are integral to this mission. The world is a connected place. History has shown us in so many ways that what happens in one place affects another. Let's do what is right and protect Tacoma and the surrounding beautiful places and make the Evergreen State not just a slogan, but a way of life. I'm ready to do my part. I hope the Washington State Department of Ecology is as well.

Koehler, Steve

Date: 7/29/25
Method: Email
Comment: See below.

From: steve@stevekoehler.com
To: Abbett, Marian L. (ECY)
Cc: Sixkiller, Casey (ECY)
Subject: Interim Cleanup Action Program for the Rayonier Mill's Hazardous Waste Cleanup
Date: Tuesday, July 29, 2025 1:49:15 PM

Marian Abbett, Section Manager
WA State Department of Ecology
PO Box 47775 Olympia WA 98504
Marian.Abbett@ecy.wa.gov

Re: Interim Cleanup Action Program for the Rayonier Mill's Hazardous Waste Cleanup

We have lived 10 miles from the Rainier Cleanup Site for over 40 years. Taxpayers should not pay Rayonier's business costs. WA State Department of Ecology needs todo the following:

• Support the Port Angeles City Council decision - Option 5

• Factor in to its cleanup cost analysis impacts to fish, wildlife, the environment and human health

• Support a full cleanup, not a coverup of soils and sediments. Remove all contaminated soils and sediments.

• Oppose leaving contaminated soils and sediment; then having to monitor them for 30 years.

• Support short—and long-term protection of the environment and public health; not a cheaper cleanup cost for Rayonier

• Remove all soils from the remaining concrete pad built hundreds of feet over the Harbor on fill that once held Rayonier’s pulp mill

• Do not pile onto the concrete pad toxic sediments or wharf infrastructure; send these to appropriate hazardous waste landfills.

• Remove the concrete pad and restore the original shoreline now under the foundation

• As soon as possible, relieve remove that dock pilings covered with creosote that is harmful to fish and other marine life.

• Ensure Ennis Creek is restored to its original shape and given space to continue the movement essential for a salmon stream

• Recreate the brackish water at the mouth of Ennis Creek for the salmon

• Support returning this area to its natural state to attract wildlife and connect it with the wildlife corridor to the east towards Sequim and Jefferson County.

• Oppose rebuilding on the site. Construction will face the same climate conditions as the mill infrastructure—sea level rise, storm surges, tsunamis, earthquakes,

• Ensure the Natural Resource Damage Assessment parties complete their work for cleaning up and providing other restoration for federal resources contaminated by the Rayonier Pulp Mill. The decision makers are NOAA, USFWS, the Klallam Tribes and WA State Ecology

• Support solid and high fencing surround the upland polluted area along with large signs that fully inform the public of the cleanup and the importance of staying off the site.

* Keep the public updated as the cleanup moves forward.

Thank you for reading our comments.

Sincerely,

Steve Koehler
steve@stevekoehler.com
360.670.3158

Sharle Osborne
sharleo@stevekoehler.com
360.670.6124

80 Percy Ln.
Sequim, WA 98382

Kolesnikoff, Paul

Date: 8/11/25
Method: Website
Comment: See below.

I oppose the proposed “clean-up” because it doesn't clean up anything. As I read it, the proposal is to pile up a bunch of toxic waste on the Port Angeles shoreline, throw a bit of dirt on top and call it good.

It is not good, in fact, it is a terrible idea!

One good storm, earthquake, tsunami, or years of erosion, and all that toxic waste will be poisoning our harbor and the Strait!

All the contaminated soil needs to be removed and buried in an arid place where it will not contaminate anyone's water.

As the report states, the proposed solution was arrived at in cooperation with Rayonier - where the primary goal seems to be to protect their bottom line - not the health and welfare of our citizens and our environment.

The only responsible solution is Alternative SL-5.

Please do the right thing and remove the Rayonier toxins from Port Angeles!

Sincerely,

Paul Kolesnikoff

LaBaw, Joanne

Date: 7/31/25
Method: Website
Comment: See below.

Rayonier Pulp Mill Site, Port Angeles, WA; Comments on Proposed Cleanup

Thank you for the opportunity to comment. As you may or may not know, I became involved with the Rayonier site back in the 1990's as a site assessment manager with the EPA. We conducted an extensive Environmental Site Assessment on the property as well as some surrounding properties and Port Angeles Harbor. At the conclusion of this assessment, I recommended to EPA management that this site be placed on the National Priority List. This was met with a lot of resistance, particularly on the part of Rayonier, the City and Port of Port Angeles as well as Ecology. We were told that the clean up would go "faster, better, cheaper" with Ecology in charge. It is now 2025, so much for "faster". I no longer work for EPA and my comments are strictly my own.

While at the public meeting, I was informed that Ecology and Rayonier have entered into a Consent Decree for the cleanup. This has taken a very long time. I believe both Rayonier and Ecology should be embarrassed about this. Rayonier, has been dragging their feet about this cleanup for a very long, long time. It seems that they prefer to pay lawyers to delay the project rather than focus on getting the job done. I encourage Ecology to stand strong and not bend to any political maneuvers that Rayonier may try to use to further delay.

I was very disappointed that there were no representatives from Rayonier or their consultants at the public meeting. I hope you will convey this sentiment to them. As a responsible party, and a former prominent member of the community, I believe it was their duty to show up.

Overall, I thought the cleanup plan was solid and comprehensive. I am concerned about the timing. Ten years is a very long time. It has already been a very long time since this site first came to EPA's attention. For reference, when I first started working on this project my daughter was 7 years old, she is now 34....! 27 years is a very long time.

I had a few general comments and questions.

- There are a number of operable units that go into the cleanup. Do these units have specific schedules? Will these schedules be shared with the public?

- Air sparging is proposed to cleanup the contaminated groundwater. The air sparging units are located next to the shoreline. It is likely there will be saltwater intrusion. Has this method been tested in salt water environments?
- Ennis Creek. This used to be an important salmon stream. I believe that the schedule for restoration should be accelerated. Also, how many samples are proposed for the creek? The sampling locations on the diagram appeared to be limited. Will samples be collected at multiple times during the cleanup to confirm the cleanup is effective? At what depth with the sediments samples be collected?

Thank you for the opportunity to comment. I look forward to hearing more about Ecology's progress on this important project.

Sincerely,

Joanne LaBaw
Joanne.labaw@gmail.com

LaBaw, Joanne

Date: 7/31/25
Method: Email
Comment: See below.

Rayonier Pulp Mill Site, Port Angeles, WA; Comments on Proposed Cleanup

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Thank you for the opportunity to comment. I look forward to hearing more about Ecology's progress on this important project.

Sincerely,

Joanne LaBaw
Joanne.labaw@gmail.com

Lamont, James

Date: 6/30/25
Method: Email
Comment: See below.

From: James Lamont lamontinpa@wavecable.com
Sent: Monday, June 30, 2025 12:41 PM

To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Subject: Port Angeles Harbor/Rayonier Cleanup

Dear: Ms. Abbett:

When I moved to Port Angeles in 2004, cleanup of the pollution in the harbor and at Rayonier was a hot topic and it has been off and on since then. But, nothing has been done but more talk and more studies. From talking to various local officials I'm inclined to believe one of the principal reasons is that the Department of Ecology keeps changing it position on just what needs to be done. As it's been said, if you can't/won't fix a problem, there's money to be made from prolonging it. It's been suggested that there are employees at the Department of Ecology that have and will continue to make a career out of the Port Angeles pollution issue. If you were really interested in cleaning up the pollution it could have been done or at least started years ago.

Jim Lamont, Port Angeles

Landrum, Connie

Date: 8/11/25
Method: Website
Comment: See below.

The proposed seven foot tall by ten acre mound on old Rayonier Mill site is preposterous. This site has been allowed to continue to poison the area by unbelievable bureaucratic foot dragging. The contaminated material needs to be removed to even begin the process of reclaiming the area. I support SL-5 as a much more reasonable solution to decades old problem.

Laney, Kathleen

Date: 8/11/25
Method: Website
Comment: See below.

The solution purposed for Alternative SL former Rayonier site with contaminated soils by capping it in place is completely unacceptable. This proposal dooms the land and neighborhood with a toxic dump site that will limit the land's development and potentially harm the health of both marine environments and land surrounding the site. Port Angeles has been waiting for 30 years for this site to be cleaned up and it's high time you finished the job. This land could be used as a park, a center of commerce, even some residential

use but because you have not done your job, we can do nothing. Finish the job of clean up, not cover up.

Kathleen Laney

Lang, Lawrence

Date: 8/2/25
Method: Website
Comment: See below.

I moved to Port Angeles in Feb 1980. I can remember the brown haze that spread out over town, clearly coming from the Rayonier mill. I remember the health threats that were part of what lead to closing the mill. I remember families who were affected. I remember the decades of promises to clean up the mill. I was a young man when I first saw that haze.... now I am old. When will the mill site be fully cleaned up and made available for safe use?

In the past year I have moved to Sequim... I still think of myself as closely connected to Port Angeles. The future purpose of the mill site is no longer of great concern to me, and yet within my remaining years I hope that the cleanup can be completed and planning for the next iteration begun.

One thing that should be considered however is to remember the native culture that occupied the site for millennia, the establishment of the Cooperative Colony at the site in in 1887, and the way that 'progress' destroyed the site in the 20th Century.

Let's turn the page and begin a new story for the mill site that can serve the community in positive ways for the next millennium.

Lawrence Lang
Park Tanger, retired

Lanigan, Anni

Date: 8/11/25
Method: Website
Comment: See below.

Toxic waste doesn't care a lick about being covered over. The only forward-thinking, environmentally safe solution for our growing region is to clean it up. As taxpayers and citizens whose grandchildren may decide to live here, we ask you to not only hear the wealthy voices of the corporations, but also the complaints of a growing population group.

Sincerely,

Anni Lanigan

Larson, Judy

Date: 8/11/25
Method: Email
Comment: See below.

Attention: WA Department of Ecology (WA ECY)

Marian Abbett

I have resided in Clallam County since 1993 and have been following with interest and concern efforts for having an appropriate cleanup of the hazardous/toxic wastes associated with the Rayonier Mill operations.

For the record, I note that WA ECY needs to pursue SL-5, NOT SL-3 level cleanup to meet its protection responsibilities and provide for permanent removal of these wastes from our County.

Thank you for your consideration.

Judy Larson

1070 W Palo Verde Loop
Sequim,WA 98382

Lesser, Lauren

Date: 8/11/25
Method: Website
Comment: See below.

I support SL5 and cleaning up the site to the fullest extent possible.

Lessor, Michael

Date: 7/24/25
Method: Website
Comment: See below.

Hello,

I am commenting in regard to the Rayonier Mill site. I have lived here about 10 years and know this issue goes far back in time here. It is a shame that it continues to have little action taken upon it and progress is moving at a snail's pace. Meanwhile, the site and surrounding area has slowly been crumbling. People are cutting the fence to the site, illegally camping and trespassing, leaving garbage and being put into harm's way on that property. People have had to be rescued from the fire department from there as well. It is becoming quite the eye sore in town. The road and parking lot down to it have become littered with trash and human excrement. Many citizens do not feel safe in that area. When I moved here, there was a public port-o-potty down there which had to be removed due to vandalism. The land has so much promise and opportunity waiting to be untapped. And continues to wait…for decades. Which is insane. Things will only get more expensive. Surely had this issue been taken care of many years ago, we wouldn't be looking at the extreme costs to fix it. And as it continues to sit, it will continue to be the site of additional vandalism, blight, and unsanitary conditions. Rather than inviting families to go for walks, or cyclists to start their bike ride, this area will continue to be an attractant for vagrants, trash, and illegal activities. Please work with the city to make Rayonier get this property cleaned up and allow the city to make use of it and improve our town. Thank you!

Lewis, Karen

Date: 8/10/25
Method: Website
Comment: See below.

Through the unanimous support of City Council, the City is advocating for Cleanup Alternative Five, which supports a complete and permanent cleanup of the Rayonier Mill Site.

I agree that nothing short of a permanent and complete remediation for the area is needed and in the best interest for community health and long term land use.

Lewis, Thomas

Date: 8/10/25
Method: Website
Comment: See below.

The selection of SL-3 is a tacit acceptance of too many unknown costs and potential adverse outcomes. It is a mitigation that pushes a true solution down the road, leaving the citizens and economy of Port Angeles in the lurch.

SL-5 provides the only acceptable solution.

Ecology has lost sight of the maxim, “Pack it in, pack it out.”

“Pack it in, pack it out” is a principle of backcountry travel that emphasizes the importance of taking all trash and waste back home after visiting natural areas. This commitment helps preserve the environment and ensures that future visitors can enjoy clean and unspoiled landscapes.

Lindholm, Erika

Date: 8/9/25
Method: Website
Comment: See below and the following two pages.

Please accept my attached letter regarding the Rayonier site proposed Interim Action Plan and Consent Decree. I am in favor of Option 5.

ERIKA G. LINDHOLM
Port Angeles, Washington 98362

August 9, 2025

Washington State Department of Ecology
Attn: Marian Abbett
PO Box 47775
Olympia, WA 98504-7775

Subject:

Dear Ms Abbett:

Please accept this letter as my comment in response to Ecology's proposed Interim Action Plan for the Rayonier Mill Cleanup Site. After attending your presentation at the Field Hall on July 8th and reviewing the Draft Interim Action Plan and Consent Decree, I want to express my dismay that Ecology is proposing option SL-3 and my strong belief that option 5 – complete removal of all contaminants – to be only responsible solution.

My belief is based on three considerations: a) cost effectiveness, b) equity, and c) Washington Department of Ecology's mission and vision.

- As many others have already expressed, the prepared cost benefit analysis appears to be flawed. It has not adequately represented long term costs of option 3. Capping contaminated soils on the site with long term monitoring required doesn't adequately consider the costs of unanticipated events or conditions that could violate the barrier. Further, if it is later determined – because of an on-site conditions/catastrophe or advances in science determining that the capping solution is not sufficiently protecting human health and the natural environment - additional remediation and/or complete clean up at a later date will be much more expensive than the cost of requiring complete removal of all contaminants today.

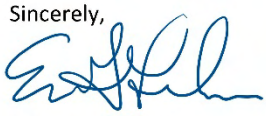
- Allowing Rayonier – who has no longer has a local presence and is a multi-billion dollar conglomerate – to be relinquished of their responsibility after complying with an order for less than complete clean up leaves the community of Port Angeles to shoulder an unequitable amount of the burden for a problem created by Rayonier. Yes, Port Angeles benefited from the jobs Rayonier provided for many years, but these jobs have been gone for over a generation and Port Angeles is left with a site that is an eyesore, a risk to human and wildlife health, and an economic drain – both from the long delays in being able to restore/rebuild the site and from possible future remediation costs should Option 3 result in additional damage after Rayonier has been indemnified. And this inequity says nothing of that which has been existing since the Klallam people were tricked into relinquishing their land and have been prevented from accessing what they thought they had preserved – access to their traditional hunting and fishing grounds. Option 3 simply perpetuates this inequity interminably.

- With the Option 3 proposal, Ecology is not adhering to its own stated mission and vision:"to protect, preserve, and enhance Washington's environment for current and future generations" towards the vision that its "partnerships protect and sustain healthy land, air, water, and climate in harmony with a strong economy." By having taken so long to arrive at this current unsatisfactory plan, Ecology has already failed at least one generation. Option 3 is not responding to the needs and wants of the current generation, and it is putting future generations at risk. The Port Angeles community has been let down by its "partnership" with Ecology. The proposed Option 3 is in direct conflict with the vision of sustaining a healthy ecosystem balanced with a strong economy. Port Angeles and the region is getting neither with this option.

I desperately hope Ecology will reconsider its proposed Interim Action Plan and Consent Decree and align with the needs and desires of the local community. At this time in history, people – particularly in rural America - are screaming to be heard in the economic and political headwinds that are intent on bending us to the will of powerful people far away from us. We are feeling less and less in control of our destiny. I truly hope that a state agency who is supposed to be working for the people and our environment will not let us down.

Thank you for your consideration.

Sincerely,



Erika G. Lindholm

Long, Kevin

Date: 7/3/25
Method: Website
Comment: See below.

We do not believe covering contaminants with fabric and soil and letting Rayonier check for leaks is adequate protection against exposure to toxic wastes that can harm health, including cancer risks. Sea-level rise, extreme weather and disturbances by animals and people could cause leaks.

This industry needs to clean up its mess completely and move it out of harms way. Rayonier made a big profit in this area and the burden of the mess they have left behind should be born by them, so what if it affects their bottom line, it should! This burden should not become the burden of the people that live, recreate and gather food on the lands and waters that are at risk of contamination from this site.

It is Department of Ecology's job to protect Washington Citizens from these harms completely, and the only way to do that is to require a complete clean up of the contamination with the contamination moved offsite to a lined landfill that accepts such materials. It does not belong in this sensitive area.

Require complete removal and site clean up, please!

Thank you!

Luker, Kim

Date: 8/8/25
Method: Website
Comment: See below.

It is astonishing to me that in the 25 years I've lived in this community, we are still here debating how to clean up the Rayonier site. I would like each member of the Department of Ecology team to remember that they are not beholden to make this process easier or less expensive for Rayonier. The goal should be to make this toxic property absolutely safe for the Port Angeles community, for our waterways, and to reclaim a beautiful piece of waterfront land.

The Port Angeles community does NOT want toxic waste capped on site - we have been very clear at every opportunity to communicate this. We want the waste removed, off site, and the entire site rehabilitated. The fact that this is deemed “too expensive” for Rayonier means nothing. They contaminated the land and then left Port Angeles with a gaping, toxic

eyesore for decades - they shouldn't be allowed to do the bare minimum. This is Ecology's opportunity to hold Rayonier accountable for the damage they have done to our community, and the fact that at every juncture they have resisted doing what should have been done for years upon years.

Please do the right thing for our community and hold Rayonier accountable.

M, Beth

Date: 7/24/25
Method: Website
Comment: See below.

I do not want to live in an area that's leaching toxic waste into our environment. I want all contaminated materials to be moved off site, option 5. This is our home and Rayonier should be held responsible for the damage they caused, no matter the cost.

MacMichael, Gretchen

Date: 8/8/25
Method: Website
Comment: See below.

Level 5 cleanup is the ONLY option that the Dept. of Ecology should consider for the former Rayonier Mill site in Port Angeles, WA.

You are the Dept. of Ecology, not the Dept. of semi-ecology. Do the right thing. LEVEL 5

Mahlow, Jeanette

Date: 8/10/25
Method: Email
Comment: See below.

I support the permanent solution of Alternative SL-5 for contaminated soil and sediment at the former Rayonier Mill site in Port Angeles, WA. Proposed Alternative SL-3, leaving contaminated soil in place forever in a capped mound which will greatly limit future development, is unacceptable

Thank you

Jeanette MAHLOW

Port Angeles resident
Kindness Matters

Main, Muriel

Date: 8/4/25
Method: Website
Comment: See below.

This beautiful site has been useless for so many years. A full cleanup is needed so, in future years, we can all benefit from it's unique beauty and location.

Maloney, Debi

Date: 8/4/25
Method: Website
Comment: See below.

Dear Marion Abbett

The Rayonier Pulp Mill property site has been in stasis for too many years.

It is time the Dept of Ecology step up and require that Rayonier fulfill its obligations to restore and protect this land for the future betterment of Port Angeles Harbor and the Ennis Creek watershed.

Continuing to ignore the necessity of a cleanup by trying to hide the issue under concrete and behind a fence is gross mismanagement of obligations by both Rayoiner and Washington State.

It is time to end the game playing and restore the health of the ecosystem and protect the people and ocean environment from further delay tactics.

I support the decision of the Port Angeles City Council to implement Option 5 for restoration and so should the Department of Ecology.

Sincerely

Debi Maloney

Manildi, Anna

Date: 8/10/25
Method: Email
Comment: See below.

Please respect the citizens of Clallam County and Port Angeles and do the maximum to clean up the contaminants left behind. That means Level 5, 100% clean up.

Thank you,

Anna Manildi

Manning, Kelly

Date: 8/10/25
Method: Website
Comment: See below.

As a concerned resident of Port Angeles I strongly urge the selection of Alternative SL-5 for the cleanup of the former Rayonier Mill site. This option represents a permanent and comprehensive solution that aligns with the City of Port Angeles' Comprehensive Plan and is essential for the future development and economic vitality of our community.

Alternative SL-5 offers a complete and lasting remediation of the site, which is crucial for public health, environmental protection, and future land use. Its implementation will facilitate sustainable growth and provide much-needed opportunities for redevelopment in an area where available sites are scarce.

Manning, Kelly

Date: 8/10/25
Method: Website
Comment: See below.

As a concerned resident of Port Angeles I strongly urge the selection of Alternative SL-5 for the cleanup of the former Rayonier Mill site. This option represents a permanent and comprehensive solution that aligns with the City of Port Angeles' Comprehensive Plan and is essential for the future development and economic vitality of our community.

Alternative SL-5 offers a complete and lasting remediation of the site, which is crucial for public health, environmental protection, and future land use. Its implementation will facilitate sustainable growth and provide much-needed opportunities for redevelopment in an area where available sites are scarce.

Manteith, James

Date: 8/1/25
Method: Website
Comment: See below.

As a Port Angeles native, I'm shocked that any consideration has been given to plans that compromise both the community's and nature's access to vitally important spaces and habitats. Please commit to Level 5 cleanup, holding Rayonier accountable for restoration and directing public funds appropriately to make up the balance for providing full healing and conditions for normative development going forward.

Mantooth, Jim on behalf of Friends of Ennis Creek

Date: 8/6/25
Method: Email
Comment: See below.

From: Jim Mantooth ennisarbor@olypen.com
Sent: Wednesday, August 6, 2025 9:52 PM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Cc: Sixkiller, Casey (ECY) csix461@ECY.WA.GOV
Subject: Comments for Rayonier mill property cleanup

There are many reasons I am favoring a Level 5 cleanup, but starting with the most important:

1. Level 5 is the only one that offers a complete cleanup, not leaving any toxic soils on site. That is most important because only that level of cleanup would allow a restoration of the complex ecosystem of Ennis Creek, which had evolved during thousands of years before it was destroyed by industrialization, lastly by Rayonier. I am referring to a snow-fed meandering stream, with a large estuary of brackish water, sheltering large trees sustaining and renewing a very large salmon population. A Klallam village was at the mouth of Ennis Creek, living in harmony with the fish and other wildlife, until the Tribal people were removed by colonization and industrialization. The last disturbance, the Rayonier mill, was built squarely on top of Ennis Creek and its estuary, along with fill dirt extending across the beach and onto a pier of thousands of creosote pilings (creosote is toxic to fish). The stream was armored and moved to the east side of its estuary, which was then paved with asphalt to provide a parking lot for the hundreds of Rayonier employees.

Since the mill was built on top of the entirety of the Ennis Creek ecosystem, very little would be left over to develop after a complete cleanup and restoration. A complete cleanup and restoration should include removing the asphalt parking lot plus removing the fill covering the historic beach and estuary. My point is that a complete cleanup is necessary before a complete restoration can start. Meanwhile, after waiting more than 25 years for a complete cleanup, the salmon and steelhead on Ennis Creek are in danger of becoming extinct. On our Conservation Easement of Ennis Creek, located about a mile upstream from the mouth, we have recently stopped seeing the small salmon preparing to move downstream. They need to acclimatize and grow in brackish water before entering the salt water. There is no decent estuary for this to happen. Spawning can happen on our land and farther upstream. A huge amount of time and money is being spent now on removing partial blockages at Highway 101 and north to the Rayonier property. But that will be wasted without a complete cleanup and restoration of the estuary and the surrounding ecosystem. I think this restoration should be done by the Lower Elwha Clallam Tribe Fisheries, mostly because of their sensitive gravesites under the parking lot, but also because of the sensitive expertise shown when they restored the stream on our property. A generous — and good PR — move by Rayonier would be to transfer ownership of the property to the tribe after the complete cleanup.

2. The remaining reasons for a complete cleanup are well known and covered already by many respondents: Our community does not want a toxic waste site left on our waterfront. Our community wants to be able to safely be on the property and safely consume fish from our harbor. Our community wants to be proud of the restored ecosystem, similar to our pride in the post dam removal Elwha River. It just seems to be the right thing to do. Then Rayonier could share the pride in a job well done.

Jim Mantooth

2238 E. Lindberg Rd.
Port Angeles, WA 98362
Co-founder, Friends of Ennis Creek

Mantooth, Jim and Robbie on behalf of Friends of Ennis Creek

Date: 8/8/25
Method: Email
Comment: See below.

We would like more information about why the cleanup process has been allowed to go on so long. In the meantime the salmonid population in Ennis Creek continues to decrease.

Thank you for helping us and others understand.
Jim and Robbie Mantooth
Co-founders, Friends of Ennis Creek

Mantooth, Robbie on behalf of Friends of Ennis Creek

Date: 8/6/25
Method: Email
Comment: See below.

From: Robbie Mantooth ennis@olypen.com
Sent: Wednesday, August 6, 2025 9:46 PM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Cc: Sixkiller, Casey (ECY) csix461@ECY.WA.GOV
Subject: Public Comment Submission – Port Angeles Rayonier Mill Study Area Cleanup

Dear Marian,

Thank you for your leadership and the opportunity to work with you.

As you see from comments arriving every day, people are adamant in wanting a complete cleanup. We certainly hope that unanimity will lead you to follow their desires.

I'm sure I don't need to tell the Ecology team working on the Interim Action Plan (ICAP) for the Rayonier Cleanup Study Area how complex this issue and all related documents are. Even though the current comment period is focused on cleanup under the state Model Toxins Control Act (MTCA), not restoration under the federal Natural Resource Damage Assessment (NRDA) law, as co-founders of Friends of Ennis Creek my husband, James E. "Jim" Mantooth, and I appreciate the ICAP's references to restoration. Thorough cleanup is essential for long-term as well as more urgently needed restoration.

We respect the care for related laws Ecology's team for the Rayonier property has shown. But we believe more attention needs to be given to the judgment the Plan (ICAP) also says it can use. This is essential for making sure needs of those most in need of the site's land and adjacent waters receive priority. Most important are the fish of Ennis Creek —

including steelhead listed under the Endangered Species Act or likely to be by the time Ecology proceeds with a plan. We are seeing evidence of their decline as well as that of the stream's native coho salmon and sea-run cutthroat trout. I first learned of the abundance of these fish in numerous reports I read when serving as a representative for our Watershed Resources Inventory Area group. Fish experts described Ennis Creek as the urban stream with the greatest potential for productivity.

We also heard Rayonier mill workers talk of watching the fish return to Ennis Creek. Mill operators had narrowed the stream to make it fit under a building where they were working, so they must have had a good view.

People we knew even talked of going to Ennis Creek to club the fish when they were so abundant they filled the stream. Of course, their deaths before being able to fulfill the purpose of their return to their natal stream deprived them of being able to create nests where spawning and fertilizing eggs would get the next generation started. Their carcasses would not even be available to nourish the bears, cougars, eagles, other animals, trees and other plants that depend on the vital riparian area created as Ennis Creek flows from the snowfields below Mount Angeles, in Olympic National Park, through land the State Department of Natural Resources manages and parcels under individual ownership. Three parcels, containing a total of more than 50 acres of watershed, are protected in perpetuity through voluntary conservation easement agreements with North Olympic Land Trust, which provides annual (not the every five years the Plan allows Rayonier) monitoring to make sure agreements are being fulfilled. The Land Trust, accredited by the national Land Trust Alliance and highly regarded as a partner for long-term conservation values, protects additional acreage through direct ownership.

I am providing this detail to reinforce our community's connections with Ennis Creek, its watershed and adjacent waters of Port Angeles Harbor, Puget Sound and other marine ecosystems. Port Angeles long has supported the Art Feiro Marine Life Center, named for a beloved Peninsula College professor so dedicated to sharing knowledge and caring that he led efforts before his untimely early death to build the original structure, on the Port Angeles City Pier. The red jump suit I wore as one of many volunteers applying the building's paint in the early 1980s still carries white blobs I dropped on it and always will treasure as one of many ways our community came together for shared efforts and benefits. A former Peninsula College fisheries student and Ennis Creek volunteer, Bob Campbell, became the Marine Life Center's beloved manager. My husband and I are stretching our family budget to donate monthly for the building that will replace it as part of the next phase of Waterfront Center construction after our community came together for

most of the Field Arts & Events Hall fundraising. The building will include recognition of the many contributions to research and education Bob made before his death.

We try to do everything we can to follow such examples as Art Feiro, Bob Campbell and others in what we believe is an exceptional community. We couldn't begin to count the people who have learned and gained community cohesiveness with such influences as are tribes, the Marine Life Center, Land Trust, Dungeness Nature Center, North Olympic Salmon Coalition, Clallam Conservation District, Olympic National Park and NatureBridge. They enhance our community and contribute to the sustainability — perhaps even survivability — of our planet.

My husband and I hosted the event the Land Trust started as StreamFest for a dozen years. Beginning with guided walks to Ennis Creek, it evolved into opportunities for diverse businesses, organizations and governmental entities to celebrate our environment while gaining knowledge and inspiration for living in harmony with it. Port Angeles Garden Club continues with the version it calls Forever StreamFest in the City Park just north of Field Hall and has explored expanding with offerings in the Hall. One of our sons even performs his original music with environmental awareness inspiration themes there and we work with other volunteers to host a booth for the Friends of Ennis Creek organization Jim and I established.

Celebrating the fish and other animals using Ennis Creek has been a priority since we got a chance to buy property in the stream's watershed. We are about as concerned about their well-being as we have been about our own family and those we've cared for in our professional lives — Jim as a children's doctor and I as a teacher and student newspaper adviser at our local college.

We try to make the steep descent and climb back to visit Ennis Creek at least weekly and sometimes daily. In the 50 years we've lived near the stream we've marveled at watching large coho making their way upstream. We've delighted in hearing coho splashing while females lay eggs and males compete to fertilize them. We like to peek into one of the side channels the Lower Elwha Klallam Tribe (LEKT) created as part of its model restoration inspired by our conservation easement agreement with North Olympic Land Trust. When we sent a photo of a large, long fish to a fisheries expert at the Tribe, we were excited to learn it represented the first documented sighting of a summer-run steelhead. Only winterrun steelhead had been officially noted before in Ennis Creek.

So not seeing any evidence of fish in recent years has convinced us of emergency conditions for the coho salmon, steelhead and sea-run cutthroat trout of Ennis Creek as well as others, including chinook salmon, we're told would come with improved habitat.

Of course, all those involved in cleanup and restoration efforts know many of the reasons for what we believe is an emergency, but I am repeating some of them for those who may read these comments and not know — just as I did not know before becoming so dedicated to saving "our last best chance of a salmon stream in Port Angeles." These problems related to lack of an estuarine environment, adequate space for stream meander and pollutants remaining from Rayonier mill operations need immediate action, following the precedent of interim remedial actions taken early in the history of efforts to clean up and restore the former Rayonier mill site.

ESTUARY — We don't know exactly how long Ennis Creek fish have been deprived of the brackish water salmonids need to make physical adaptations for moving from the stream's freshwater to the saltwater of Port Angeles Harbor and beyond to grow and get ready to return, adapt again and produce another generation of these iconic fish. Photos taken during the days of the Puget Sound Cooperative Colony's utopian community alongside Ennis Creek in the 1890s clearly show a salt marsh that would have functioned as an estuary, providing essential brackish water. Rayonier must have drained and paved that space sometime after it purchased the land where it operated a mill from 1930 to 1997, using toxic chemicals to turn wood pulp into a variety of products, including photographic film and hosiery. We understand a tribal cemetery remains beneath the pavement.

More than one observer of this desecration has quoted the Joni Mitchell song about paving paradise and putting up a parking lot. It's time for us to right these wrongs through some sort of emergency interim remedial intervention coordinated with cleanup. That earlier interim remediation combined cleanup and habitat restoration.

2. SPACE —Salmon streams need room they had when they were edged with big conifers essential for shade and nutrition for fish from bugs in their bark. Before replacement trees mature and fall into waters with their bugs, Ennis Creek needs space for logs to be moved in and anchored. The logs and log jams they create will force the stream to again be more sinuous, slowing flows enough to protect spawning gravels and nests from getting scoured. They also give young fish places to hide from predators and protect them from getting washed out into the Harbor without the physical adaptation or size that might help them be more likely to survive.

Just as interim remediation that removed fuel from Ennis Creek early in the MTCA cleanup process included moving the stream enough to reduce its artificially straight and narrow shape, the stream desperately needs intervention now. It seems that the expertise, creative minds and networking background of Ecology's team, with guidance from the Lower Elwha Klallam Tribe, should be able to do something about overcoming the

constraints Rayonier put on the stream as well as the loss of the salt marsh with its brackish water when it paved it for a parking lot.

3. POLLUTANTS —The fact that toxins still are harming fish and other marine life seems representative of the problems caused by division of responsibilities into cleanup and restoration. The team working on cleanup under MTCA can't change the law, but they should be able to expedite removal of all contaminants and increase opportunities for restoration. How long have people known the creosote pilings under Rayonier's dock are poisonous? Why haven't they been removed? It's way past time to get them and affected sediments to a landfill such as one in eastern Oregon where they can be stored safely.

Isn't it just a matter of time before Ecology is sued by people who have consumed contaminated seafood from Port Angeles Harbor? Warnings can't be adequate. And, if toxins are harmful to marine life, why aren't people warned about the dangers of affected waters for themselves, their children and pets? Of course, we also are concerned about damage to wildlife. Thinking warning signs will help them avoid the area, as one professional consultant stated, just plain "silly" — unless someone knows how to teach them to read.

Not many years ago I believe I was only one of two or three people testifying against Rayonier's proposal to put even more pilings under its dock when dangers of the creosote impregnating them already were known. The mayor at that time gave me this advice, in a superior-sounding voice: If we don't let Rayonier add more pilings, how are you going to feel when the dock collapses and pilings are scattered farther? The cost-benefit analysis from that past Mayor and City Council members obviously placed higher value on Rayonier continuing to profit from its dock than on the health of fish, other marine life, people, pets and wildlife exposed to toxins. Surely the authors of the Interim Action Plan can do better.

Port Angeles is fortunate to have much more enlightened leadership for the City, County, business and economic development community, nonprofits and tribes as well as ordinary residents who give time and resources out of appreciation for this exceptional place. Their realization of the importance of protecting quality of life for all sharing our area is particularly impressive when thinking about the enormous changes harming jobs and financial stability we've experienced over the decades of many residents' lifetimes. Ecology needs to respect the significance of people here supporting good habitat for all despite financial insecurity and not wanting to gamble losing it because of a patch of contaminants Rayonier doesn't want to pay to have moved to a landfill appropriate for them, such as the one often mentioned in eastern Oregon. We appreciated payrolls companies like Rayonier provided, but it's time to promote an economy that depends more on providing quality of life for people living and visiting here.

Just as some people once saw no problem with creosote, how do we know all the soils Ecology now considers least contaminated and wants to keep on the former mill site don't contain what also will be found harmful to health?

No one can know the future use of the Rayonier land with certainty. But if ALL contaminants are moved to an appropriate landfill, that will increase the former mill site's suitability for various uses, including the restored estuarine area, as well as space for a stream with the sinuosity and wood it once had. Only a Level 5 cleanup will do that.

Rayonier has had more than a quarter century to proceed much more rapidly than it has toward better cleanup and restoration. Costs keep rising for Rayonier, and patience keeps running out among the public.

Reading comments people submitted in 2019 in response to Ecology's previous cleanup plan tests one's patience. We've tried to be patient while also persistent, as the indigenous people have been despite countless desecrations of land, water, air, plants, animals and human health. But it is dispiriting that some comments coming in now repeat the arguments from the past, even from some of the same people! How can we have faith our oft repeated comments will make any difference?

When I asked the Ecology team why public opinion was so little valued when essentially all comments during the last time Ecology accepted them, in 2019, demanded a complete cleanup, I was told public opinion counts for only 10% in the cost-benefit analysis. Does that make our comments meaningless? The law's allowance for judgment in addition to such cold mathematical calculations would seem to enable people — mostly local — whose priorities for a complete cleanup obviously are only motivated by concerns for health and well-being of all life receive more respect. Sometimes locals can be so influenced by perceived material benefits that a broader view is needed. But who can argue with people wanting to do right for health and well-being of all life?

Ecology has sidestepped my questions about why cultural and commercial values of Ennis Creek's dwindling salmonid populations aren't being considered when determining costs for Level 5 to be "disproportionate" to benefits of taking all contaminants to an appropriate landfill. If the contaminants can't cause any harm, why are fences, signs and monitoring necessary? Why go to the expense of engineering and other calculations to protect against leakages from sea-level rise, extreme weather and such incidents as earthquakes and tsunamis?

The population in the town where most of the commenters live may be small, but that doesn't mean we're stupid.

We're thankful the City has hired experts who have found disparities in calculations Ecology has provided about cleanup levels 3 and 5. I have more faith in the City's consultants than in justifications Rayonier must believe it is obligated to make to its shareholders. We need to be able to have faith the State Department of Ecology isn't being more compliant with Rayonier's desire to save money than our state public servants should be.

We taxpayers are bearing the expense of improved fish passage, including the one for Ennis Creek under Highway 101. The least Rayonier can do is pay for cleanup and restoration of what enabled it to make great profits over many years.

We appreciate what members of the team have said about future opportunities to weigh in on topics still being researched, but we need written assurances not only about being able to comment but also about having our opinions given more regard than a meaningless 10%.

Failure to exercise appropriate judgment beyond explicit legalities tests our faith in democracy. We realize people have made the laws Ecology professes to follow, but legal interpretation tangles mean all life affected by Rayonier mill operations continue to be harmed. Some have said they know decisions will only be made by lawyers.

We urge those given this opportunity to do the right thing — for the sake of the proverbial seven generations and for the thousands of more years ahead when people can experience the satisfaction possible because at this point in time we gave back for the great privilege of living here.

People of our area — including Rayonier and its investors — can be known for the kind of community vision that opened up the Elwha River to its historic spawning and other habitat areas. Wouldn't that be better than trying to keep people and other life safe from fenced-off contaminants and breaches from sea-level rise, earthquakes, tsunamis and extreme weather that exceed what fences can control?

Our family is doing everything we can for the fish of Ennis Creek. We celebrate the community that is becoming increasingly aware of the need to give back for getting to live here.

It is very concerning that Ecology's preferences aren't supporting the community spirit we value.

Do we want to say, as the verse about paving paradise and putting up a parking lot ends:

"Don't it always seem to go
That you don't know what you got 'til it's gone?"

Robbie Mantooth
Co-founder, Friends of Ennis Creek

Mantooth, Robbie on behalf of Friends of Ennis Creek

Date: 8/12/25
Method: Email
Comment: See below.

5. Environmental Justice (section of the Ecology's Interim Action Plan)

WAC 173-340-380 requires that cleanup action plans summarize how impact on likely vulnerable populations and overburdened communities were considered when selecting the cleanup actions.

Selection of Level 3 is inadequate in complying with this State law in addition to many other points made in my earlier communications as part of the official public comment period.

Only a complete cleanup can make the kind of restoration possible that is needed to return salmonids to Ennis Creek in any numbers approaching their historic populations.

Otherwise polluted areas and the need to devote many acres to storing contaminants make restoration actions more difficult if not possible. The stream needs an estuarine area, space and water free of toxins.

Ecology seems to have relied on the requirement that the Lower Elwha Klallam Tribe review its plans and many other documents. That is good, but doesn't meet the requirements regarding likely vulnerable populations and overburdened communities.

Cleanup and restoration is supposed to be permanent. It needs to measure up to the highest standards science and technology determines regardless of what one tribe may agree to at a certain point in time.

Fish and other marine life in Port Angeles Harbor are not safe to eat. Ecology has the responsibility to change that as well as make sure the waters of Port Angeles Harbor are safe for people and others spending time in them.

Thank you for considering these additional thoughts.

Robbie Mantooth, co-founder, Friends of Ennis Creek

Mantooth, Wes

Date: 8/7/25
Method: Website
Comment: See below.

I believe strongly that Ecology must require the Rayonier corporation to address the environmental impact of its past use of this site using the highest level of remediation, SL5. Rayonier has the financial means to carry out this remediation, which would include complete removal of contaminated soil and creosote pilings, and restoration of the estuary that existed before the company developed the site. Any cost-benefit analysis must consider not only the economic value of restored land to the community and its many visitors, but also the cultural significance of a healthy creek to current and future generations.

Wes Mantooth
(Currently living in Kirkland, WA, but grew up in Port Angeles)

Markee, Anna

Date: 8/4/25
Method: Website
Comment: See below.

I was born and raised in Tacoma and am well acquainted with the impacts of a pulp mill. In my work creating ecological landscapes, I regularly deal with the challenges of gardening in contaminated soil. Washington state Residents from Port Angeles to Tacoma deserve clean air, water, and soil. I support Alternative 5 so that future generations don't bear the brunt of pollution. As a mother, I urge state leaders to consider the impact to the next seven generations, not just current cost. Additionally, we must take an opportunity to restore natural creeks and shorelines including Ennis Creek.

Marrs, John

Date: 8/11/25
Method: Website
Comment: See below.

At age 84, I have long observed the Rayonier Mill site, having ben a landowner and resident for 45 years. We ive at Lake Sutherland in and since 2017 winters in a town condo that overlooks the former mill site. That skeleton dock reminds us over and over of the toxic materials we know pollute that water. Because the possible use of fungi is NOT among the

listed options, I agree with the reasoning of the Port Angeles City Council in support of Option #5. We have waited and waited and waited … Moving ahead on the clean-up is more than overdue. Please accept the reasoning of the City Council and accept option #5. Thank you.

Marrs, Marie

Date: 8/11/25
Method: Website
Comment: See below.

As a Sr. Citizen, at age 82, I have long observed the Rayonier Mill site. I was born and raised here, but after living all over the country over the years, my husband and I chose to move "back home," after retirement, to the beautiful Olympic Peninsula. In the summer we are on Lake Sutherland; in the winter our town condo overlooks the former mill site. The condition of that skeleton dock reminds me over and over of the toxic materials we know are in the ground. After having taught Environmental Education among other secondary school subjects, I'm surprised that the use of fungi is not being considered. Since it is NOT one of the options, I am in full agreement with the reasoning of the Port Angeles City Council who support Option #5. We have waited and waited and waited and waited….Moving ahead on the clean-up is Way Overdue. Please accept the reasoning of the City Council and accept option #5. Thank you.

Martin, Roger

Date: 8/12/25
Method: Website
Comment: See below.

My residence is in Steilacoom. We have an old paper mill's property across the road from Chambers Creek. It has finally been sold. However, they want to rebuild there, and it ain't the situation that the creek don't rise. It is rising along with the rising sea level, and it won't be long before the old property is at least occasionally inundated (My daughter is on the team of six Oxford doctoral candidates finishing a four-year study on rising sea levels, and Chambers Creek will indeed rise with the rising tides.). A complete cleanup is necessary for these places, or you're going to pollute the Sound even more than it is already going to be polluted as a consequence of rising sea levels. The rights of the Tribes need to be honored, unlike what happened with the disappointing hearings on the lawsuits associated

with the Tacoma Tideflats' LNG facility, which were clearly biased by the judge who heard the hearings. Get it right this time.

Mattern, David

Date: 8/5/25
Method: Email
Comment: See below and the following two pages.

From: David Mattern dmattern@avvanta.com
Sent: Tuesday, August 5, 2025 6:27 PM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Cc: nwest@cityofpa.us
Subject: Comments on Port Angeles Rayonier Mill Site cleanup

Attached are my comments on the Port Angeles Rayonier Mill

Site. Thank you for your consideration.

David Mattern
Certified Environmental Professional, Emeritus
dmattern@avvanta.com
206-300-1798

I want to submit the following comments on the Port Angeles Rayonier Mill Site:

- I endorse Option 5 (full removal) as the appropriate, long-term approach that provides for public safety, environmental health and lowest overall risk. Other alternatives do not result in long-term protection for human health and the natural environment.
- I understand that MTCA and other regulations are fairly prescriptive, however, I don't think your application of these regulations adequately takes these considerations into account:
    - *Likely costs of future additional remediation:* Further remedial actions and higher costs are likely for two reasons. First, our scientific understanding of the effects of toxic materials continues to grow and there is no reason to believe our knowledge won't continue to increase. Materials and levels that are acceptable now very likely won't be acceptable in the future. Second, the cost of remediating contaminated sites has increased significantly over time. In 1980, the initial Superfund program allocated $1.6 billion for cleanup, averaging $3.6 million per site. By 1990, the EPA estimated total cleanup costs at $27 billion, averaging $26 million per site. Recent estimates suggest that cleaning up all Superfund sites could exceed $1 trillion, considering stringent standards and additional sites under various jurisdictions. These national trends are likely to apply to this site; there is no reason to think otherwise. Removing contamination during initial remediation avoids or minimizes this risk.
    - *More intensive and extensive public use of the site:* As you are aware, both the City of Port Angeles and Clallam County are updating their Comprehensive Plans in accordance with the Growth Management Act. By 2045 the City's and County's populations are projected to grow by 3,150 and 14,840, respectively. The City is proposing residential and recreational land use in the site area, and the County's increased population will further increase demand for recreational areas and shoreline access. Most importantly for the decision at hand these increases won't end in 20 years – they are most likely to continue well beyond that time. Remediation after the site has been developed would be much more difficult, disruptive, and costly than removing contamination during the initial remediation.
    - *Costs of additional measures to adapt to rising sea levels (climate change):* The proposed action acknowledges additional study and design is needed to adapt to changes in shoreline dynamics and sediment transport as sea levels rise. Unfortunately these changes now appear certain well into the next century. This means on-going adaptive measures

to ensure toxic materials are not released. If the materials are removed during the initial site remediation these future measures would be unnecessary.

- *Potential costs of protective measures:* The proposed preferred alternative includes ongoing monitoring and maintenance and so implicitly acknowledges that toxic materials remaining at the site would continue to pose a risk to human health and the natural environment. Many of the contaminants, such as metals, remain toxic for many decades and it does not appear the present value of monitoring and maintenance for the full duration of the risk is adequately incorporated into the evaluation. Obviously if the materials are removed these future costs are avoided.

In summary, while your analysis shows Option 5 appears expensive relative to its benefits, I believe a more realistic evaluation that recognizes likely and potential long-term costs of additional cleanup actions would show full removal is the most prudent and ultimately the least expensive alternative.



Matyus, Sandra

Date: 8/9/25
Method: Website
Comment: See below.

RAMP operated during a time when long term negative environment impacts weren't considered, profits were the priority. Now 28 years later after RAMP has closed and left behind the damage they are still trying to do the least possible for the most financial gain.

The remedial investigation reveals contamination in the SOIL, GROUNDWATER, and SEDIMENT. Which means the contamination is worse when a complete cleanup/investigation is performed. Consider the toxic waste that has been leaching into the surrounding areas for 28 years! Read the report, a clean up remedy designed by Port Angeles Rayonier Mill Site based on hydrodynamic/sediment transport modeling. How can we trust RAMP to conduct a study for clean up.

A complete clean up of the area with provisions for monitoring of future issues is the only acceptable agreement.

Tribal Nations, residents and future generations deserve better. Don't let this become another corporation ignoring the consequences of their actions. A full clean up and restoring the area to a healthy site is required.

McAleer, Colleen on behalf of the Clallam County Economic Development Council

Date: 7/28/25
Method: Email
Comment: See below the following two pages.

From: Colleen McAleer <cMcAleer@clallam.org>
Sent: Monday, July 28, 2025 4:32 PM
To: Abbett, Marian L. (ECY) <MABB461@ECY.WA.GOV>
Cc: sworthington@clallampud.net <seanw@clallampud.net>; sames@pencol.edu; calebm@portofpa.com; sequimfoodbank <sequimfoodbank@olypen.com>
Subject: Clallam EDC Comment Letter RE Rayonier Clean Up

Marian,

Please find comments from the Clallam County Economic Development Council.

Thank you,

Colleen



Colleen McAleer | Executive Director | Clallam County EDC
Cell 360.461.2218 | Office 360.457.7793
141 W First St, Port Angeles, WA 98362
cmcaleer@clallam.org | www.clallam.org
Click here to Sign Up to our EDC Newsletters

EDC
CLALLAM ECONOMIC DEVELOPMENT COUNCIL

July 23, 2025

Marian Abbett
Washington State Department of Ecology
PO Box 47775
Olympia, WA 98504-7775
Via email: Marian.Abbett@ecy.wa.gov

RE: Port Angeles Rayonier Mill Cleanup Documents Comments

Dear Marian,

The Clallam County Economic Development Council is the county and state-designated economic agency for Clallam County. Clallam County is economically distressed by both federal and state measures. Our median income is only 60% of the state's average income. As such, our comments come through a lens of ensuring Clallam County sustains a healthy environment while allowing for opportunities for our citizens to have careers in high wage sectors. For Clallam County citizens that primarily means growth in Construction, Forest Products, Clean Energy, Manufacturing and Maritime Clusters which will aid in improving local access and attainability of home ownership and a better quality of life.

The Rayonier site needs to be available for productive high wage job use, and currently there are extremely limited growth opportunities for the above-mentioned clusters. This rare property can not only facilitate these high wage industry sectors we rely upon, but it also offers a critical waterfront interface. It is imperative that the portion of the site most capable of improving our local economic base is permanently cleaned to prevent impediments to incoming business opportunities. A seven-foot cap of contaminated material with an environmental covenant will not enable the success of future job creating uses. Over the decades there have been dozens of interested parties that would have liked to purchase the property for a clean industrial use if only the cleanup had been completed.

We applaud you for speeding up the process this year. We urge you to ensure that Rayonier can soon sell the property to a new user to be able to use this unique property for creation of high wage job opportunities at the site for the betterment of the community as a whole.

Sincerely,

Colleen McAleer
Executive Director

Mcalpin Jr, Frank

Date: 8/10/25
Method: Email
Comment: See below.

Please have the proper cleanup done and not just bury it. Thanks much.

McCann, Sheila

Date: 7/28/25
Method: Email
Comment: See below.

From: sheila mccann sheila83014@yahoo.com
Sent: Monday, July 28, 2025 1:36 PM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Subject: Rayonier Cleanup

Dear Marian,

I feel very strongly that Rayonier should clean up this area to restore it to the natural and safe condition it was before they set up a business operation. Their responsibility is to make this a safe area for people and wildlife. And now that the Olympic Discovery Trail is gaining in popularity--to both locals and visitors from all over the world-- it should have lose the industrial-use designation and be deemed multi-use and open space to enhance our shoreline.

Thank you,

Sheila McCann

McCulloch, Tom

Date: 7/26/25
Method: Email
Comment: See below.

I am in support of a complete SL5 cleanup of the Rayonier mill in Port Angeles.

It is high time we get it done now!

Tom McCulloch
824 Caroline St.
Port Angeles, WA 98362

Thmcc824@gmail.com
Thlbm@olympus.net

McGee, Carolita

Date: 7/1/25
Method: Website
Comment: See below.

CLEANUP NOT COVERUP

I support the City of Port Angeles and many other governmental entities, nonprofit organizations and individuals for almost every comment submitted to the State Department of Ecology during the last comment period — in 2019 — that Rayonier must be required to remove ALL contaminants from its former mill site. For the latest report Ecology officially released about five years later — June 12, 2025 — Ecology has moved its preferred cleanup level only from Level 2 to 3, out of 5. Level 5 is the only alternative that would excavate ALL contaminants and move them to a landfill, like one in eastern Oregon, where they can be safely contained.

Covering contaminants with fabric and soil and letting Rayonier check for leaks is not adequate protection against exposure to toxic wastes that can harm health, including cancer risks. Sea-level rise, extreme weather and disturbances by animals and people could cause leaks.

Much of the rationale for Ecology letting Rayonier off with less expensive ways of dealing with least contaminated wastes is based on comparing estimated costs to perceived benefits. But Rayonier and Ecology aren't counting the value of salmon and steelhead or the well-being of current and future generations of people, fish and other animals.

McGee, Carolita on behalf of the Port Angeles Business Association

Date: 8/12/25
Method: Email
Comment: See below.

Ms. Abbett,

Please accept the reasoning of the Port Angeles City Council and select Option #5 - full clean-up. We live west of the city of Port Angeles and enjoy bike riding on the Olympic Discovery Trail along the coast, traversing the Rayonier toxic waste site. The site should be returned to the original state it was in before the Rayonier Mill was in operation, for the

benefit of fish, wildlife, the ecosystem, and residents. This includes restoring Ennis Creek back to its natural conditions. We cannot allow the pollution to remain and continue to harm the area for generations to come. Rayonier should pay for the full clean-up, as they profited from dumping the pollutants in the ground and air.

Thank you,
Carolita McGee
Port Angeles, WA

McGee, Scott

Date: 8/11/25
Method: Email
Comment: See below.

Ms. Abbett,

Please accept the reasoning of the Port Angeles City Council and select Option #5 - full clean-up. We live west of the city of Port Angeles and enjoy bike riding on the Olympic Discovery Trail along the coast, traversing the Rayonier toxic waste site. The site should be returned to the original state it was in before the Rayonier Mill was in operation, for the benefit of fish, wildlife, the ecosystem, and residents. This includes restoring Ennis Creek back to its natural conditions. We cannot allow the pollution to remain and continue to harm the area for generations to come. Rayonier should pay for the full clean-up, as they profited from dumping the pollutants in the ground and air.

Thank you,

Scott McGee
Port Angeles, WA

McIntyre, Amy

Date: 8/10/25
Method: Website
Comment: See below.

Subject: Please Choose Alternative SL5 for a Permanent Cleanup of the Rayonier Mill Site

Marian Abbett, Site Manager Washington Department of Ecology PO Box 47775 Olympia, WA 98504-7775

I am writing as a concerned citizen and a member of the Port Angeles community to express my strong support for Alternative SL5 for the cleanup of the former Rayonier mill site. This is a critical issue for the long-term health of our community and the unique marine habitat of our waterfront.

The Port Angeles waterfront is a vital resource and a home to critical species, including our endangered Southern Resident killer whales, salmon, and migratory birds. The contamination at the mill site, including PCBs, dioxin, and heavy metals, poses a significant and ongoing threat to this sensitive ecosystem.

Alternative SL3, which involves simply capping the site, is not a permanent solution. This temporary fix ignores the very real risks of sea-level rise, coastal erosion, earthquakes, and floods that could breach the cap and re-release pollutants into our waters.

A complete and permanent cleanup is long overdue. I urge you to select Alternative SL5, which involves the full removal of all contaminated soil. This is the only lasting solution that will truly protect our community and our environment for generations to come.

I believe the benefits of SL5 are vastly understated, and the costs of SL3 are not accurately estimated. The long-term health of our community is a benefit that cannot be measured in simple terms.

[Add a few sentences here about why the Port Angeles waterfront is important to you personally, or why you care about this issue.]

Please, for the sake of our community and our environment, choose Alternative SL5.

Sincerely,

Amy McIntyre
Port Angeles

Meiner, Grant

Date: 8/11/25
Method: Email
Comment: See below.

Ms. Abbett:

I reside in Port Angeles and I respectfully submit my comment to you regarding the cleanup of the site of the former Rayonier mill in my city.

I urge that Rayonier be required to abide by Cleanup Alternative Five (SL-5) for the return of it's former mill site to our community in the condition it was before Rayonier took over.

The solution proposed by Rayonier, SL-3, will leave contaminated soils and sediments in a large raised mound on a 10 acre area forever. That proposed solution is not a solution at all since it will leave a permanent, massive, unhealed wound in our otherwise beautiful waterfront that will never allow proper and useful development of that area.

Rayonier took a valuable piece of our community and misused it for years to make profits for its shareholders. Now that the corporation is finished with abusing our community, it should be required to return the land to us in the same condition that it found it. We should not be further abused and left to deal with Rayonier's noxious waste forever. That would be the ultimate cut and run by Rayonier to the eternal detriment of Port Angeles.

Sincerely,

Grant S. Meiner

Melquist, Wayne

Date: 7/28/25
Method: Website
Comment: See below.

Greetings. I live on the bluff directly above the Rayonier mill site. I support option EL5, total cleanup of the former mill site. In any case, I suspect that a clean site with the removal of all structures extending into the water, will likely not occur in my lifetime. Nonetheless, every effort should be made to expedite cleanup. Thank you for the opportunity to comment.

Menshew, Ellen on behalf of Clallam County Democrats

Date: 8/12/25
Method: Website
Comment: See the following four pages.

CLALLAM COUNTY DEMOCRATS

PARTY OF THE PEOPLE

August 12, 2025

Ms. Marian Abbett – Site Manager
WA Department of Ecology
Olympia, WA

Re: Public comments – former Rayonier Mill site – Port Angeles, WA

Dear Ms. Abbett,

The Clallam County Democrats (CCD), affirm our unwavering commitment to wise environmental stewardship in accordance with our adopted Party Platform. As stated therein, *"Restrictions on practices by individuals or corporations should be in accordance with protecting and conserving our environment or repairing degraded areas. We support environmental restoration and protection."* In upholding these values, CCD has consistently collaborated with our local, state, and federal elected officials, tribal partners, and state agencies to facilitate these goals.

It has been almost thirty years since the Rayonier Mill site was razed, leaving behind more than 4,000 creosote pilings and a legacy of contaminants that continue to leach toxins into the Port Angeles harbor and its environs. During this time, CCD members and other dedicated local advocates have actively participated in restoring the Ennis Creek area, remarkably resulting in a return of salmonids to its waters—a testament to the power and necessity of restoration. But populations of the stream's dominant Coho salmon and threatened steelhead have been diminishing over recent decades.

On July 8, 2025, at the Department of Ecology (DOE) presentation held at the Field Arts & Events Hall in Port Angeles, public comment was clear and resounding: the community overwhelmingly supports a total cleanup of the former mill site. With the estimated cost for comprehensive remediation projected at $25 million, DOE officials referenced the Model Toxics Control Act (MTCA) and its requirement to weigh cleanup costs against projected benefits. We are deeply concerned that the DOE, citing these provisions, is considering a lesser option involving only partial removal and covering remaining contaminants with fabric and such materials as gravel, sand, and soil. Former mill operator Rayonier would be delegated to monitor periodically for leaks. This proposed approach raises serious questions regarding value, accountability and efficacy. There are no calculations including commercial and cultural value of the fish that could be damaged by leaving contaminants when calculating costs of removal versus benefits—it evokes the troubling image of the fox guarding the henhouse.

When the will of the people is so clearly in favor of a full cleanup, we believe it is imperative to lend our voices in support of Option 5 – total cleanup, removal of all toxic waste, and remediation at this site. Going forward, we will work with our elected officials to ensure that laws must evolve to reflect not only economic calculations, but our collective values and vision for the future.

P.O. Box 2454 Port Angeles, WA 98362 (360)452-0500

Our community deserves action that reflects both scientific best practices and the expressed will of its citizens.

On July 11, 2025, the Clallam County Democrats unanimously passed Resolution No. 2025-09 (attached), supporting total cleanup at the former Rayonier Mill site. We see Option 5 as the only path forward to ensure the health and well-being of current and future generations in our community. We urge you to negotiate a full settlement with Rayonier, and its subsidiaries, to ensure this outcome.

Sincerely,



Ellen Menshew
Chair, Clallam County Democrats
clallamdemschair@gmail.com

Resolution for Public Comment on Port Angeles Rayonier Mill Cleanup

Resolution 2025-09

Whereas The Washington State Department of Ecology has established this current period until 11:59 p.m., August 12, 2025, for public comment on the proposed action plan for environmental cleanup at the Port Angeles Rayonier property where industrial pollution has occurred for over 100 years; and (1)

Whereas The Clallam County Democrats' Mission includes promoting wise environmental stewardship, including Clean Air and Clean Water and it is important that we stand up and have our voices counted (2); and

Whereas Investigations by U.S. Environmental Protection Agency and Washington Department of Ecology have revealed that dangerous chemicals and sediments exist at levels of concern and pose a risk to marine and wildlife, humans and the environment (3); and

Whereas Democrats believe it is in the best interest today to build a healthy environment, respect the humans, wildlife and marine creatures that historically will follow us inhabiting our land, waters, air and forests. (4)

THEREFORE, BE IT RESOLVED that the Clallam County Democratic Party (CCD) unequivocally demands removal of all contaminants from the Upland Study Area and transport of contaminated materials to an appropriate disposal site such as one in Eastern Oregon; and

BE IT FURTHER RESOLVED that CCD calls upon The State Department of Ecology to modify its Interim Action Report to require such removal; and

THEREFORE, BE IT FINALLY RESOLVED that this Resolution be adopted by the Clallam County Democrats and distributed to the State Department of Ecology administration, Washington Governor Bob Ferguson and our representatives in Congress and the State Legislature.

Submitted by: Robbie Mantooth, and Bill Biery - Clallam County Democrats
Adopted: July 11, 2025, by the membership of the Clallam County Democrats

References

1 Public Comments Welcomed

https://ecology.wa.gov/spills-cleanup/contamination-cleanup/cleanup-sites/puget-sound/port-angeles-harbor/ rayonier-mill

[2] Clallam County Democrats' Mission
https://www.clallamdemocrats.org/mission.html

3 Contaminants in the upland and marine areas
ecology.wa.gov/rayonier page 3,
In the upland area, soil and groundwater are impacted by:
• Polycyclic Aromatic Hydrocarbons (PAHs)
• Polychlorinated Biphenyls (PCBs)
• Dioxins
• Ammonia
• Metals: Such as arsenic, iron, lead, zinc, thallium, copper, manganese, and nickel
• Total Petroleum Hydrocarbons (TPH): Diesel and heavy oils
• Elevated pH: Impacting groundwater quality

In the marine area, marine sediments and animal tissue are impacted by:
• Polycyclic Aromatic Hydrocarbons (PAHs)
• Polychlorinated Biphenyls (PCBs)
• Metals: Such as arsenic and lead
• Dioxins
• Phenols
• Phthalates
• Woody debris: May impact habitat and water quality

Contaminants pose a risk to human health through direct contact with contaminated materials or by eating fish and shellfish exposed to these substances. (Department of Ecology Publication 25-09-092, page 3)

4 Washington Model Toxics Control Act
(MTCA) Chapter 173-340 WAC Cleanup Standards
https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305&full=true
https://ecology.wa.gov/regulations-permits/laws-rules-rulemaking/closed-rulemaking/wac-173-340

Washington State Department of Ecology publication 94-06
https://ecology.wa.gov/regulations-permits/laws-rules-rulemaking/closed-rulemaking/wac-173-340

Menshew, Ellen

Date: 8/8/25
Method: Website
Comment: See below.

I have lived in this community for 35 years. My husband has lived in Port Angeles for 55 years and grew up just a block west of the Rayonier Mill.

It has been almost thirty years since the Rayonier Mill was razed in Port Angeles, WA. In the years since, the devastating effects of toxic waste - from the 4,000 creosote covered pilings and other contaminents - leaching into the water and surrounding areas has grown exponentially. The harm to our environment, the risks and exposures to humans and other species cannot be overstated. Clean up and restoration of this site is long overdue.

I've attended public meetings and forums throughout our community and the consensus has been unanimous in support of a total cleanup of this former mill site. It is incumbent on the Department of Ecology to act in full support of the will of the people in moving this effort forward and to hold the property owner, Rayonier and its subsidiaries, accountable to pay for Level 5 cleanup at this site. The protection of the health and well being of the citizens in our community, the waters, marine life, and surrounding environment demands total remediation. No more negotiating, act now! We can't afford to suffer through this for another generation.

Merriwether, Ph.D., Megan

Date: 8/11/25
Method: Email
Comment: See below.

I support the permanent solution of Alternative SL-5 for contaminated soil and sediment at the former Rayonier Mill site in Port Angeles, WA. Proposed Alternative SL-3, leaving contaminated soil in place forever in a capped mound which will greatly limit future development, is unacceptable.

Megan C. Merriwether, Ph.D.
Clinical Psychologist
206-300-5865

Miller, Helen

Date: 8/11/25
Method: Website
Comment: See below.

The only conscionable action is to fully clean up the Rayonier Mill site even if the upfront cost is higher. We must think of the people who follow us and the interconnectedness of our ecosystems, particularly as climate changes and people move to cooler climates and more abundant water sources. Any later discoveries of failed containments will only burden the people who live here with more costs. This we've learned with Hanford and the Duwamish. The list goes on. Thank you.

Miller-Indresano, Nathan

Date: 7/25/25
Method: Website
Comment: See below.

It is my desire that we do not go with option 3 (capping), and instead go with option 5 (removing). If we are going to get the site cleaned up, we should do so in the most permanent manner, not one in which leads to further costs for future development. The slow pase of the clean up is preventing the sustainable development of our town. Personally I have desires to start my own marine business, growing seaweed for fertilizer and other agricultural purposes, but the status of the polluted site prevents me from seriously moving forward with it.

Please go with the option that leads to permanent remediation of the area, so that we can once again safely use the area."

Minton, Mary

Date: 8/10/25
Method: Email
Comment: See below.

I support clean up of the former Rayonier mill site cleaned up to Level 5 — the only level that would have ALL contaminants taken to an appropriate landfill such as one in eastern Oregon.

Thank you for your work and effort toward this goal.

Mary W Minton, MSW, LICSW
2442 Lower Elwha Rd, Port Angeles, WA 98363

Mittmann, Laura

Date: 8/12/25
Method: Website
Comment: See below.

Capping is NOT acceptable as a cleanup. Rayonier came into this community and contaminated it with pollutants, and is trying to get out of paying to clean up after itself. I want a FULL and TOTAL cleanup of all contaminents and it needs to be done NOW. This has been going on for DECADES and we still do not have land that is safe and usable. It is a blight on the community.

Monahan, Jo

Date: 8/11/25
Method: Website
Comment: See below.

As a Port Angeles resident, I strongly urge the complete cleanup of the toxic Rayonier Mill site. Corporations must be held accountable for the impact of their business and harms of that business whether current or closed. Our watershed and bioregion, our communities and human/more-than-human inhabitants deserve to be free of ongoing and future harms. We know that impact to air, water, and soil impacts the lives, livelihoods, and health of this entire region. We ask you to do the ethical, moral and integrity-filled thing by a complete cleanup of this site.

Moore, Matthew

Date: 7/8/25
Method: Website
Comment: See below.

First of all, I would like to express my gratitude for everyone working on this.

Personally, I would like to see this site transformed into a public space for leisure and learning. The site has significant history and ought to teach a lesson while bringing some relief that we ultimately did as good as we could.

Regarding the cost and benefit of the extent of restoration. I believe we should take a scientific approach to the restoration with adequate safety factors in place to prevent a future unhealthy outcome. And where financing is always an issue, I believe the process should be as transparent as possible and allow the primary stakeholders a chance to weigh the risks and have the opportunity to take the restoration efforts further than recommended. For example, additional funding may come from interest groups - especially those whose industries rely on salmon populations.

Morris, Jason

Date: 7/11/25
Method: Website
Comment: See below.

My comment is in relation to the plan to cap 10 acres of contaminated soil rather than remove it altogether from the Port Angeles Rayonier Mill site. This is not an acceptable solution. Contaminated soil should be completely removed from the site to return it to closer to its natural state. Even the Dept. of Ecology itself acknowledges that this would be the best option. Nonetheless, Ecology has decided to choose the cap option, with the reasoning that the cost of removal would outweigh the benefits. I disagree strongly with this opinion. Having these chemicals in the environment does immeasurable harm to us as humans as well as the fish and mammals which live in the Port Angeles Harbor area. Not to mention the risks that natural disasters like earthquakes and tsunamis present to the long-term viability of any cap placed on contaminated soil. I understand this remedy will be designed with predicted future disasters in mind, but the risks of having these contaminants escape the cap in the future, whether due to natural disaster or poor design or construction, are far too great. There is no cost too great when it comes to removal of toxic waste that is doing harm to people and the environment. Rayonier saw fit to release these substances into the environment in the first place (and leave them there when they moved out of the site) and now they should be required to pay the price to clean up their mess completely, regardless of how much it costs. It is high time that companies begin to pay the true price of the messes they have made in the past and to stop placing the burden of cleaning those messes on taxpayers.

Morris, Judith

Date: 8/3/25
Method: Email
Comment: See below.

From: Judith Morris kudu1028@gmail.com
Sent: Sunday, August 3, 2025 11:00 AM
To: Sixkiller, Casey (ECY) csix461@ECY.WA.GOV
Subject: Rayonier cleanup

This is an easy choice. Please count me as favoring the full clean up - option 5. I've watched Rayonier bob and weave and find ways to do little or nothing for 25 years. It is the for them, and Ecology, to step up and do the right thing for this property. Thank you, Judith

---

Morrow, Dan

Date: 8/11/25
Method: Website
Comment: See below.

Capping the site and putting a fence around it is not a real solution. A bad bandaid at best. The site must be fully excavated per the Alternative S-5. This is the only realistic environmental fix and would allow Port Angeles to have a waterfront area it has been denied for close to 30 years. It's time to do it right!

Respectfully,

Dan Morrow

Murata, Marie

Date: 8/6/25
Method: Website
Comment: See below.

I am advocating for a complete clean up of the former Rayonier Mill site.

Murata, Marie

Date: 8/6/25
Method: Email
Comment: See below.

From: Marie Murata mlynne12@gmail.com
Sent: Wednesday, August 6, 2025 1:53 PM
To: Sixkiller, Casey (ECY) csix461@ECY.WA.GOV
Subject: Rayonier Mill Site

I am advocating for a complete clean up of the former Rayonier Mill site.

Marie L. Murata
916-217-4358
1011 Walker Street
Port Angeles, WA 98363

Nabors, Barbara

Date: 8/10/25
Method: Website
Comment: See below.

I urge the Washington Department of Ecology to select Alternative SL-5 for contaminated soil and sediment. This alternative provides a permanent solution and aligns with the City of Port Angeles Comprehensive Plan for future development of this area.

Alternative SL-3 is unacceptable. Alternative SL-3 requires perpetual maintenance and institutional controls. It is vulnerable to failure. A fenced 7-foot high, 10 acre mound will be a permanent eyesore that will cast a continued blight on the City of Port Angeles and greatly reduce the potential for development in a community with limited development opportunity.

In addition, the analysis prepared by the City's consultant, Integral Consulting, shows that the estimated costs of Alternative SL-3 are underestimated and incomplete and the costs of Alternative SL-5 are overestimated.

The proposed ten-year time frame for cleanup is unacceptably long. I worked in environmental cleanup of contaminated sites for another state for 25 years. The proposed cleanup is not overly complex. The Expanded Site Investigation occurred in 1997. The Port Angeles community has been waiting for a final solution for almost 30 years and now

another 10 years is proposed for a relatively straightforward cleanup. It's time to do right for the City of Port Angeles. Select Alternative SL-5.

Nattinger, Susan

Date: 8/12/25
Method: Website
Comment: See below.

Please choose alternative PL5 for Port Angeles Rayonier cleanup project. This choice will best protect people and the environment, and allow for eventual restoration of Ennis Creek Estuary.

A complete and permanent cleanup is long overdue. I urge you to select Alternative SL5, which

involves the full removal of all contaminated soil. This is the only lasting solution that will truly protect our community and environment.

Nilde, Cherste

Date: 7/27/25
Method: Website
Comment: See below.

I'm writing in support of SL5. I have retired in Port Angeles, working my way from the Midwest to this beautiful small town. I have walked the harbor area as well as sailed into the harbor. Half of that beautiful harbor is derelict because of the Rayonier Mill site. Please make sure it is cleaned right the first time. Make sure it is beautiful, safe for man and wildlife, and once again a living part of Port Angeles Harbor. Thank you.

Nunley, Suzie

Date: 6/30/25
Method: Website
Comment: See below.

CLEANUP NOT COVERUP

I do not believe covering contaminants with fabric and soil and letting Rayonier check for leaks is adequate protection against exposure to toxic wastes that can harm health, including cancer risks. Sea-level rise, extreme weather, and disturbances by animals and people could cause leaks.

I support the City of Port Angeles and many other governmental entities, nonprofit organizations, and individuals for almost every comment submitted to the State Department of Ecology during the last comment period — in 2019 — that Rayonier must be required to remove ALL contaminants from its former mill site. For the latest report, Ecology officially released about five years later — June 12, 2025 — Ecology has moved its preferred cleanup level only from Level 2 to 3, out of 5. Level 5 is the only alternative that would excavate ALL contaminants and move them to a landfill, like one in eastern Oregon, where they can be safely contained.

Nunley, Suzie

Date: 7/30/25
Method: Email
Comment: See below.

From: Suzie Nunley
Sent: Wednesday, July 30, 2025 9:18 AM
To: Sixkiller, Casey (ECY)
Subject: Rayonier clean up

Please provide a complete cleanup of the former Rayonier mill site — shuttered for more than a quarter century but still harming waters affecting fish, other wildlife AND people!

Thank you. Suzie Nunley
431 Maple Grove Rd, Port Angeles, WA 98363

Nutter, Linda

Date: 8/11/25
Method: Website
Comment: See below.

I am a 40-year resident of Port Angeles, and, obviously, during those 40 years, Rayonier has been in the state of operation, shutting, down, having a Consent Decree, some interaction with the City of Port Angeles, etc. Yet, so very little has been accomplished to remove an extreme toxic area.

Choice 5 is the correct choice, whereas Choice 3 is only postponing complete cleanup while leaving a toxic waste pile with no direction of what is to happen in the future with the toxic matter other than Rayonier is to “monitor” every 5 years. Obviously and logically, 2 feet of covering is not adequate whether due to placement of being directly on the Juan de

Fuca shoreline or possible burrowing animals, people climbing, cutting or going under the fence, earthquakes, etc. The recent highest recorded earthquake in Russia demonstrated the extreme possibility of an earthquake and/or tsunami along with West Coast, and Port Angeles is in the danger zone.

If the inadequate choice of #3 is chosen, then at some future date, a permanent disposal of the toxic pile will have to be completed. Why handle toxic material twice when once will complete the proves.

With Ecology stating that trucking would be bad, trucking moved a great deal to the site over the years including toxic materials via truck. Saying that trucking is not a choice is an invalid argument. Physical items arrived at the site generally by trucking and left by trucking. Saying the trucking is dangerous to everyone that drives and lives on the disposal route is in danger is ludicrous. Having a toxic “dump” on the shoreline exposes everyone living in Port Angeles and those traveling through the town. That is extremely dangerous because the “pile” goes on year after year after year, and between each 5-year inspections of the pile, who knows what is leaching, or off gassing, or being moved around by burrowing animals (now dead and eaten by other animals who ingest the toxic dead animal and then die themselves, and around and around it goes), etc.

Another point is the state's salmon restoration project to replace the current fish barrier culverts. A short distance just upstream from Rayonier's property, Washington's DOT is currently installing a friendly fish passageway for salmon. Why have a new and improved passageway when the salmon are negatively affected by the creosote pilings that are not being removed plus not having an estuary and salt marsh to acclimate to/from salt water. Ennis Creek's flow into the Strait has been paved over. Why not have Rayonier's part of Ennis Creek be re-established with an estuary and salt marsh with this cleanup? Or is DOT's new salmon passageway way on Ennis Creek just a waste of Washington taxpayer's money that will not help save salmon or other fish.

Just as a reminder or refresher, an average marine piling contains about 61 gallons of creosote. Creosote contains over 300 different chemicals. All pilings should be removed to a safe and permanent location; and when the non-fish and removal time coincide, can it be possible to have more than 1 removal crew working simultaneously? I have no knowledge if this is possible because of the movement of the soil while removing a pile plus if anything else is simultaneously affected.

I heard a person ask if Rayonier could afford the cleanup. First of all, does or does not the splitting the company into 2 corporations eliminate the responsibility of 1 of the 2 Rayonier organizations? As you know, splitting can have 1 company have more capital than the

other; thus, is Rayonier saying they do not have sufficient capital because only 1 company was financially evaluated. Really?

In the selection of either option 3 or option 5, it appears that the financial numbers have been elevated for option 5 while option 3 has been slightly modified. Option 5 is a permanent and best solution over option 3, which is: “kick the can down the road and come up with an answer in the future while letting Port Angeles live with a toxic dump during that time.” DO THE CLEANUP CORRECTLY THE FIRST TIME IS THE OBVIOUS AND CORRECT CHOICE. OPTION 5!

Obrebski, Paula

Date: 8/11/25
Method: Website
Comment: See below.

I want to make my strong preference known for a full cleanup (level 5) of the Rayonier Mill site. I am a regular early morning walker from downtown Port Angeles to Lees Creek, which takes me alongside the former mill property. During the 20 years I have lived in Port Angeles I have seen only minor improvements to this blighted section of the trail (improvements such as closing off the old parking lot, removing the loop to the city waste treatment plant, and replacing the Ennis Creek bridge). During all that time it has been known that the site is contaminated and without significant cleanup cannot become a recreation area. Only level 5 cleanup is appropriate for such a use. If capping and covering is put in place it will impede further improvement, making it more expensive and less likely to happen. Just get it done, now.

O'Neill-Eash, Marilyn

Date: 8/12/25
Method: Website
Comment: See below.

I have reviewed the information presented at the Port Angeles City Council Meeting on July 22, 2025. I believe that Solution #5, a full clean-up makes the most sense.

For the benefit of Rayonier, future generations, and the restoration of the estuary and creek, the cleanup should be permanent.

SL5 is permanent and allows property reuse.

P, Haley

Date: 8/12/25
Method: Website
Comment: See below.

Marian Abbett, Site Manager Washington Department of Ecology PO Box 47775 Olympia, WA 98504-7775

I am writing as a concerned citizen and a member of the Port Angeles community to express my strong support for Alternative SL5 for the cleanup of the former Rayonier mill site. This is a critical issue for the long-term health of our community and the unique marine habitat of our waterfront.

The Port Angeles waterfront is a vital resource and a home to critical species, including our endangered Southern Resident killer whales, salmon, and migratory birds. The contamination at the mill site, including PCBs, dioxin, and heavy metals, poses a significant and ongoing threat to this sensitive ecosystem.

Alternative SL3, which involves simply capping the site, is not a permanent solution. This temporary fix ignores the very real risks of sea-level rise, coastal erosion, earthquakes, and floods that could breach the cap and re-release pollutants into our waters.

A complete and permanent cleanup is long overdue. I urge you to select Alternative SL5, which involves the full removal of all contaminated soil. This is the only lasting solution that will truly protect our community and our environment for generations to come.

I believe the benefits of SL5 are vastly understated, and the costs of SL3 are not accurately estimated. The long-term health of our community is a benefit that cannot be measured in simple terms.

Not only is the site harmful from an ecological perspective, it is also unsightly. A cleanup of the site alongside coastal restoration would beautify the community and could also provide additional areas for recreation to enjoy this unique coastline.

Please, for the sake of our community and our environment, choose Alternative SL5.

Sincerely,

Haley P.

Paulson, Anonymous

Date: 6/30/25
Method: Website
Comment: See below.

Rayonier MUST be held accountable for the full and complete clean-up of the Port Angeles mill site. They enjoyed many years of profit running the mill, and harvesting trees from Olympic Peninsula.

I do not believe covering contaminants with fabric and soil and letting Rayonier check for leaks is adequate protection against exposure to toxic wastes that can harm health, including cancer risks. Sea-level rise, extreme weather, and disturbances by animals and people could cause leaks.

I support the City of Port Angeles and many other governmental entities, nonprofit organizations, and individuals for almost every comment submitted to the State Department of Ecology during the last comment period — in 2019 — that Rayonier must be required to remove ALL contaminants from its former mill site. For the latest report, Ecology officially released about five years later — June 12, 2025 — Ecology has moved its preferred cleanup level only from Level 2 to 3, out of 5.

Level 5 is the only alternative that would excavate ALL contaminants and move them to a landfill, like one in eastern Oregon, where they can be safely contained.

Rayonier was in operation for years. While living up hill from the mill I could watched the smoke from their stack. When the west wind blew the pollutants from the mill carried to Gales Addition.

In the 1980s the area east of Rayonier Mill was known as the 'cancer area'. I did not understand the name until I noticed when the wind was blowing from the west it settled in Gales Addition. When the wind blew northwest the pollution/contaminants traveled up the hill to where lived. I needed to close my home's windows and come inside if I was gardening.

I knew which way the wind was blowing because I could taste an acidic element in the air. The people of Port Angeles have suffered enough from the effects and negligence of Rayonier and the lack of adequate protection from government.

I worked for a business along Front Street. I was outside caring for merchandise and could not only see the gray cloud of pollution but taste it in the air. I mentioned this to a customer who told me he was from the government monitoring the air quality. He said they just fined the Mill $300.00. I gave a small laugh and said that what they spend on lunch.

I am happy to see something is finally getting done but it must be thorough and not just a patch. People's lives are at risk. Do the right thing get rid of these contaminants.

Pawl, Eleana

Date: 8/4/25
Method: Website
Comment: See below.

Last week, the west coast of the United States was under a tsunami threat following the earthquake in Kamchatka. I live in Seattle, and thought of my friends in Port Angeles.

This week I heard from friends in Port Angeles that “DOE proposes to pile up toxic waste over 10 acres right along the discovery trail, “cap” it and put a chain link fence around it and call it good. We want a COMPLETE cleanup!”

It is not responsible for the DOE to go along with anything short of a COMPLETE cleanup. We are living in a time of increasing earthquake and tsunami activity. It's not just theory. Please--while we have the chance, let's not put ourselves at risk for contamination or leave future generations this project as a legacy of our lack...do the right thing: CLEAN IT UP COMPLETELY.

--Eleana Pawl

Peet, Dr. Tom

Date: 8/9/25
Method: Website
Comment: See below.

I am a resident of East Port Angeles and I have attended a number of informational sessions on the cleanup of the former Rayonier Mill site since my wife and I moved here from Ohio 5 years ago.

I was appalled to learn that this situation has been allowed to stay unmitigated for almost 30 years. And that after over a century of dumping toxic chemicals into the harbor and Juan de Fuca Strait.

It is clear to me that only one of your proposed levels of cleanup is satisfactory, and that is the highest level of cleanup: Option 5. I will accept nothing less. To accept less would leave and “cap” 10 acres of toxic waste on site. Given the indisputable global warming that is right before our eyes, the risk of site damage or catastrophic failure of this “cap” from sea-level rise, storm surge, and tsunamis is simply too much. Would you like 10 acres of

capped toxic waste in your backyard, or is it simply that it isn't in YOUR backyard that makes the risk acceptable to you?

I ask that ALL costs be accounted for, including costs of not achieving full restoration of Ellis Creek and the costs of future damage to the site.

All toxic contaminants must be removed, if not, they will plague our community for the indefinite future! Only Option 5 accomplishes this reasonable request.

Option 5 is what the City Council of Port Angeles voted to recommend, and I stand with my community and our city council.

Dr. Tom Peet
Port Angeles

Peet, Georgia

Date: 8/9/25
Method: Website
Comment: See below.

I have lived in Port Angeles for 5 years. I have a Masters in Environmental Biology from Ohio State University and was shocked to find that the toxins from the Rayonier Mill site were not completely mitigated within 10 years of the closure of the Rayonier Mill plant.

The only cleanup option that is acceptable is Option 5. Anything less than that leaves a toxic dump site in Port Angeles and is totally unacceptable. The geology of this area and the risk of site damage or catastrophic failure is to high to do anything less than Option 5.

This problem has been shelved for 30 years and exposed our region to very dangerous toxins for far to long. The mitigation must include restoration of Ennis Creek and the surrounding area. Anything less is just shoving the problem and even more excessive cost down the road.

The cost estimates don't account for all the cost involved and compromises any decisions that will be made. Port Angeles deserves to have this cleaned up properly now!

Pelayo, Anne

Date: 8/12/25
Method: Website
Comment: See below.

Dump on the small town and then do a bare minimum leaving the consquences on a small rural working town. America at its worst. Please do a proper clean up in the proper timeframe. We've been waiting 25 years and this property is a prominent property in this town. We can and should do better than this. The clean up should allow this key property to be developed and not just covered up.

Pelayo, Steven

Date: 7/25/25
Method: Email
Comment: See below.

From: Steven Pelayo stevepelayo@gmail.com
Sent: Friday, July 25, 2025 5:19 PM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Subject: A Deeper Look Port Angeles' Past and Future

My name is Steven Pelayo, and I serve as Treasurer of the Port Angeles Waterfront District Board, which is leading revitalization efforts for the downtown waterfront.

My family has deep roots here — my wife's ancestors arrived in Port Angeles 135 years ago and played a foundational role in shaping the city. Her grandfather, a former City Engineer, helped design everything from the road tunnels leading to Hurricane Ridge to the breakwater in Sekiu.

I'm writing today to share my strong concern about the proposed cleanup options for the Rayonier Mill site. While I won't reiterate all the technical arguments that others have made, I will say this: Option 3 is not the right answer for Port Angeles. It limits the long-term potential of our community and fails to match the scale of opportunity that a full and thoughtful cleanup could unlock.

What I can offer is context—critical context about what's at stake. I urge you to take just 15 minutes to watch my presentation titled "Trends and Consequences - A Port Angeles Analysis of Where We Live and How We Grow." Link: https://youtu.be/lRHz9qEJmuQ .

I've presented this data to the Port Angeles Business Association, the Clallam County Economic Development Council, Rotary, Kiwanis, and the local Association of Realtors. It

outlines how Port Angeles compares to 10–15 other counties and cities in Washington across key indicators: job growth, wages, school enrollment, housing, crime, economic activity, and more. The data is compelling—and sobering.

Since the closure of the paper mill that left us with toxic waterfront, our community has struggled across nearly every measurable dimension. We've seen stagnation and decline in ways that other communities have avoided. The root of these challenges is economic. We need growth, opportunity, and a clean, usable waterfront to help create a vibrant future.

Port Angeles has incredible assets—our gateway to Olympic National Park, nearby timberlands, a deep-water port, and a stunning natural harbor. But without a full and future-oriented cleanup of the Rayonier site, we are squandering the chance to leverage those advantages.

Please don't settle for a half-measure. This community deserves more than a Band-Aid on a 30-year wound. We are ready to rebuild. We just need your help.

Regards,

Steven Pelayo

_____

Steven C. Pelayo, CFA
email: stevepelayo@gmail.com
mobile: 1 (360) 808-5154

Pendergrass, Ania

Date: 8/8/25
Method: Website
Comment: See below.

I absolutely and strongly feel that the clean up should be: SL5. I would urge the city of PA to vote for THE FULL SL5 clean up of Rayonier site.

Respectfully, Ania

Perkins, Matthew

Date: 7/24/25
Method: Website
Comment: See below.

Please go with option 5. It's only long term solution that is good for us, the environment, and the wildlife.

Perry, Janelle

Date: 8/9/25
Method: Website
Comment: See below.

I believe a Level 5 cleanup is the only acceptable option that the Dept. of Ecology should consider for the former Rayonier Mill site in Port Angeles, WA.

Perry, Judy

Date: 7/26/25
Method: Email
Comment: See below.

From: Judy Perry djcjcp5@gmail.com
Sent: Saturday, July 26, 2025 6:33 AM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Subject: SL5

Rayonier cleanup should have been declared a superfund years ago. It needs to be completely cleaned up so it can be safely used by the public. Please support SL5. Thanks for your consideration. Judy Perry

---

Perry, Judy

Date: 8/10/25
Method: Email
Comment: See below.

Rayonier Mill site should have been declared a super fund years ago.

SL5 is the only solution. Proposed Alternative SL-3, leaving contaminated soil in place forever in a capped mound which will greatly limit future development, is totally unacceptable. We already have covered vented piles of soil from the mill already located

around our city that are not usable and in questionable areas. These should be removed as well.

Judy Perry

Perry, Matt

Date: 8/10/25
Method: Website
Comment: See below.

I want to see the full clean up of the site and not just putting a cap on it forever. Rayonier came here, extracted our resources then left us with a huge mess. It's on them to clean it up. They have the money.

The citizens of this town deserve to have a clean waterfront and clean water. Putting a cap on it doesn't solve the problem.

Do the right thing!

Petri, Armand

Date: 8/7/25
Method: Website
Comment: See below.

I have recently become aware that Rayonier is responsible for the hiring of consultants who estimate the costs of preferred solutions and is overseen by the Department of Ecology (also known as the DOE).

I believe DOE to be negligent in their oversight of costs and benefits estimates.

The DOE informed us that SL3 had to be the choice because the cost-benefit ratio was too high, and this was “the law,” an RCW over which they had no control. The fact that the estimated costs have been minimized in SL3 and exaggerated in SL5 results in a differential of $27 million, which forces SL3 to be the preferred solution by the letter of the law.

After further examination of the cost estimates of SL3, several areas are underestimated and incomplete, for instance, permitting, design and modeling, maintenance, repairs, and monitoring (to be done by Rayonier), plus coordination with sediment work and potential toxicity of untested sediments beneath the current dock as well as unknown protocols necessary for that remediation.

The benefits have been estimated too high and the costs too low for SL3.

How much will it cost when there is damage to the 10-acre capped toxic soil along the waterfront?

There's no modeling for loss of taxes, economic benefits, acts of God, along with sea level rise in these estimates.

SL-5 estimates are higher than expected. Engineering is not as complex, economy of scale, erroneous $75,000 restrictive covenant preparation cost included (which should not be there), and non-construction cost of $6.25 million higher than for SL3, which seems inaccurate as well.

For the benefit of Rayonier, future generations, and the restoration of the estuary and creek, the cleanup should be permanent.

SL5 is permanent and allows property reuse.

How is it possible that in these cost-benefit ratio estimates, there's no financial accounting for the fish, salmonids, and the estuary that is no longer available to them, yet essential to their survival?

SL3 is much more complex.

It involves fencing, signs to limit access, 30 years of post-construction monitoring, an environmental covenant, and a commitment to maintenance by Rayonier.

It should be easy to build, yet SL5 is underscored at 6, as excavation, loading, and transfer are well-known technologies.

On the other hand, SL3 has been over-scored at 9 with complex engineering for erosion-proof 7-foot (possibly more, depending on sediment findings) fenced 10-acre mound, considering sea level change, inclement weather, and an environmental covenant are the factors NOT being considered in this over-scoring of SL3.

Compliance with the Comprehensive Plan is not considered in estimates.

We need a PERMANENT resilient solution and consideration of modeling and repair challenges to design, construct, and maintain the consolidation area. The cost estimate must recognize that SL3 is more complex and will cost more than SL5 to design and maintain.

These discrepancies and oversights make it clear that SL5 is the actual correct choice of preferred solutions.

We request that SL5 be the preferred and permanent solution to this long-delayed toxic cleanup.

Phillips, John

Date: 6/22/25
Method: Website
Comment: See below.

Rayonier MUST be held accountable for the full and complete clean up of the Port Angeles mill site. They enjoyed many years of profit running the mill, and harvesting trees from our beautiful Olympic Peninsula. They reaped the rewards of where we live, and now that they have have left, they need to be held accountable for leaving it the way they left it. This area was pristine and beautiful before they built the mill. Now that the mill is gone, it is their responsibility to "leave it the way they found it". Just the same standard as we as individuals are expected to adhere to when we visit nature. There is no difference. PLEASE please please....hold them accountable for cleaning up the mess they left behind.

Phillips, John

Date: 7/21/25
Method: Website
Comment: See below.

Rayonier needs to be held accountable for a full and complete cleanup and restoration of the old Rayonier Port Angeles Mill site. They have managed to stall doing anything at all with this for 28 years, leaving a valuable piece of property useless to anyone. Between the Mill and their timberland holdings, Rayonier has reaped the rewards of the Olympic Peninsula substantially. Walking away from, and leaving a mess that they created is unacceptable. The Rayonier Mill site needs to be completely cleaned up so that every inch can be utililized by future generations.

Pickett, Paul

Date: 7/8/25
Method: Other
Comment: See the following two pages.

DEPARTMENT OF ECOLOGY
State of Washington

Please Write Clearly or Go Online:
go.ecology.wa.gov/comment2270

Public Comment Form

1 Comment | 2 Review | 3 Your Copy

Commenting open: **June 12, 2025 8:00 AM PT—August 12, 2025 11:59 PM PT.**

Port Angeles Rayonier Mill: Consent Decree, Draft Interim Action Plan, and SEPA Checklist & Determination of Non-significance

Please note that this comment form is for the purpose of submitting a comment to the Washington Department of Ecology. Commenter contact information is optional. Contact information is necessary if you want to receive future notices or responses related to this topic.

We would like your input on the following documents:

- **Consent Decree** – To move the cleanup forward, Ecology will enter into a legal agreement called a consent decree with the parties responsible for cleanup—Rayonier A.M. Properties LLC and Rayonier Advanced Materials (collectively referred to as "RAMP" or "Rayonier"). The consent decree is a legal agreement that would require RAMP to carry out Ecology's Interim Action Plan.
- **Draft Interim Action Plan** – Ecology's proposal of how to clean up the study area. It includes a schedule and cleanup requirements.
- **State Environmental Policy Act (SEPA) Determination of Non-Significance** – Based on an environmental checklist, Ecology has determined that the proposed cleanup is not likely to result in significant environmental impacts.

Scan the QR code to learn more about the cleanup or review documents.



Contact Information

All fields are optional unless otherwise indicated.

Submitted by: (Check one and write name)

- [X] Individual (add name below)
- [ ] Organization: _____
- [ ] Agency: _____
- [ ] Other _____
- [ ] Business: _____

First Name	Last Name
Paul	Pickett

Address	City/Town
2354 E. 3rd Ave	Port [redacted] Angeles

Country: USA

State/Province	ZIP
WA	98362

Email: fraxinus@reachone.com

Please write comment clearly on other side:

DEPARTMENT OF ECOLOGY
State of Washington

Please Write Clearly or Go Online:
go.ecology.wa.gov/comment2270

Public Comment Form

1 Comment | 2 Review | 3 Your Copy

Your Comment

Comments are due by August 12, 2025 at 11:59 p.m.
To make a comment, please enter your comment(s) in the text area. To submit attachments please visit Ecology's online comment form at https://go.ecology.wa.gov/comment2270.

Any information (e.g., personal or contact) you provide on this comment form or in an attachment may be publicly disclosed and posted on the Internet.

To submit comments for a group please visit our "Commenting Tips" webpage at https://ecology.wa.gov/About-us/Get-involved/Public-input-events/Commenting-tips

Next Steps: After the close of the comment period, Ecology will review and consider all comments received as we finalize the documents and respond accordingly.

Ecology has a remarkable opportunity to "renature" the Port Angeles waterfront. I worked for Ecology for over 30 years as an environmental engineer, mostly in EAP. I moved here several years ago. Almost immediately, I discovered the Olympic Discovery Trail and applied a section as a volunteer steward. As such, I ride my bicycle through this area regularly. It is a remarkable area with so much potential to restore its natural capital and environmental services. It has cultural importance - the former location of a Native American village. It has importance as the mouth of Ennis Creek, the most important salmon stream between the Elwha River and Morse Creek. It has waterfront and near-shore marine habitat of priceless value. I call this "renaturing" because we have an opportunity to create a magnificent natural area. This would be an investment in our community. It also represents this area's shift from a wildly economy to a tourist + retirement economy. I'm glad I speak for my dog, this jogger, their children, and many other local businesses and residents. We need the best cleanup possible. Ecology should require the highest level of restoration. Rayonier can afford it. The community and our environment needs it. Leave no toxic materials on the site. Complete removal is necessary. Do this for us, and for future generations.

DEPARTMENT OF ECOLOGY
State of Washington

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

Accessibility: https://ecology.wa.gov/About-us/Accountability-transparency/Our-website/Accessibility

Pickett, Paul

Date: 8/10/25
Method: Website
Comment: See below and the following two pages.

My comments are in the attached document.

August 10, 2025

FROM: Paul J. Pickett, Port Angeles WA
TO: Marian Abbett, Site Manager, Washington Department of Ecology
CC: Casey Sixkiller, Director of the Department of Ecology

Comments on Rayonier Mill Cleanup Plan

Core message
Ecology needs to clean up the Rayonier mill site to the Option 5 level – the highest level of clean-up. Detailed comments follow.

Written comments provided at Ecology's Port Angeles meeting
(in case you had trouble reading my handwriting 😊)

Ecology has a remarkable opportunity to "renature" the Port Angeles waterfront. I worked for Ecology for over 30 years as an environmental engineer, mostly in EAP. I moved here several years ago. Almost immediately, I discovered the Olympic Discovery Trail and adopted a section as a volunteer steward. As such, I ride my bicycle through this area regularly. It is a remarkable area with so much potential to restore its natural capital and environmental services. It has cultural importance – the former location of a Native American village. It has importance as the mouth of Ennis Creek, the most important salmon stream between the Elwha River and Morse Creek. It has waterfront and nearshore marine habitat or priceless value. I call this "renaturing" because we have an opportunity to create a magnificent natural area. This would be an investment in our community. It also represents this area's shift from a mill economy to a tourist and retirement economy. I'm sure I speak for my son and his wife, their children, and many other local businesses and residents. We need the best cleanup possible. Ecology should require the highest level of restoration. Rayonier can afford it. The community and our environment need it. Leave no toxic materials on the site. Complete removal is necessary. Do this for us, and for future generations.

Detailed comments
- I support the Port Angeles City Council decision supporting Option 5.
- Ecology needs to factor into its cleanup cost analysis all impacts to fish, wildlife, the environment and human health. It should also factor in the benefits of a complete site restoration to community and Tribal culture and values.
- Ecology should include in its analysis the risks at this site to disturbance. The site is close the shore and there are significant and probable hazards at this location, including earthquake, tsunami, and ocean inundation from high tides and storm waves. A storm from the north a couple years ago overtopped and blew out the berm along the Olympic Discovery Trail a short distance to the east. This is not a stable location, rather it is a dynamic shoreline bordering a large exposed ocean waterbody. This reality supports a full cleanup, not just a coverup of soils and sediments. Remove all contaminated soils and sediments from the site.
- Risks increase with time due to the inevitable impacts of climate change and sea level rise, and the natural process that will cause deterioration of the site. If contaminated soils and sediment are left

on the site, monitoring will need to continue indefinitely, not just for 30 years. This is a cost to be included. Also repair to the site in the indefinite future needs to be include in your analysis.

- Your analysis needs to include short- and long-term protection of the environment and public health. Rayonier can afford this cleanup, so Option 5 is not just providing the most benefit, it is also financially feasible to the responsible party.
- Ensure Ennis Creek is restored to its original shape and given space to allow the connectivity and natural dynamics essential for a salmon stream. This includes restoring the brackish water zone at the mouth of Ennis Creek. All benefits or fully restoring the mouth of Ennis Creek should be included in Ecology's analysis.
- Ecology needs to support returning this area to its natural state to attract and support upland wildlife and connect it with the wildlife corridor to the east towards Sequim and Jefferson County. These benefits should be included in the analysis.
- Other aspects of the cleanup to consider:
    - Remove all soils from the remaining concrete pad built hundreds of feet over the Harbor on fill that once held Rayonier's pulp mill.
    - Do not pile onto the concrete pad toxic sediments or wharf infrastructure; send these to appropriate hazardous waste landfills.
    - Remove the concrete pad and restore the original shoreline now under the foundation
    - As soon as possible relieve remove that dock pilings covered with creosote that is harmful to fish and other marine life.
- Ecology needs to ensure the Natural Resource Damage Assessment parties complete their work for cleaning up and providing other restoration for federal resources contaminated by the Rayonier Pulp Mill. These decision makers include NOAA, USFWS, the Lower Elwha Klallam Tribe, the Jamestown S'Klallam Tribe.
- Any remaining polluted areas, in particular any upland areas need to be surrounded with solid and high fencing along with large signs that fully inform the public of the cleanup and the importance of staying off the site.
- Ecology needs to ensure that the public is updated as the cleanup moves forward. In addition, Option 3 would require regular updates of site conditions, while Option 5 allows minimal monitoring and reporting. These are additional costs to consider.

Thank you for consideration of my comments.



Pickett, Paul

Date: 8/11/25
Method: Email
Comment: See below and the following two pages.

Marian and Casey,

My comments on the Rayonier Mill cleanup in Port Angeles are attached.

There are many reasons to do a complete cleanup at this site. I hope a full analysis is completed and the desires of the community are respected. Please require Rayonier to do a complete cleanup as described in Option 5.

Thank you,

Paul Pickett
Port Angeles, WA
360-359-3435

"What you do makes a difference, and you have to decide what kind of difference you want to make."
- Dr. Jane Goodall

August 10, 2025

FROM: Paul J. Pickett, Port Angeles WA
TO: Marian Abbett, Site Manager, Washington Department of Ecology
CC: Casey Sixkiller, Director of the Department of Ecology

Comments on Rayonier Mill Cleanup Plan

Core message
Ecology needs to clean up the Rayonier mill site to the Option 5 level – the highest level of clean-up. Detailed comments follow.

Written comments provided at Ecology's Port Angeles meeting
(in case you had trouble reading my handwriting 😊)

Ecology has a remarkable opportunity to "renature" the Port Angeles waterfront. I worked for Ecology for over 30 years as an environmental engineer, mostly in EAP. I moved here several years ago. Almost immediately, I discovered the Olympic Discovery Trail and adopted a section as a volunteer steward. As such, I ride my bicycle through this area regularly. It is a remarkable area with so much potential to restore its natural capital and environmental services. It has cultural importance – the former location of a Native American village. It has importance as the mouth of Ennis Creek, the most important salmon stream between the Elwha River and Morse Creek. It has waterfront and nearshore marine habitat or priceless value. I call this "renaturing" because we have an opportunity to create a magnificent natural area. This would be an investment in our community. It also represents this area's shift from a mill economy to a tourist and retirement economy. I'm sure I speak for my son and his wife, their children, and many other local businesses and residents. We need the best cleanup possible. Ecology should require the highest level of restoration. Rayonier can afford it. The community and our environment need it. Leave no toxic materials on the site. Complete removal is necessary. Do this for us, and for future generations.

Detailed comments
- I support the Port Angeles City Council decision supporting Option 5.
- Ecology needs to factor into its cleanup cost analysis all impacts to fish, wildlife, the environment and human health. It should also factor in the benefits of a complete site restoration to community and Tribal culture and values.
- Ecology should include in its analysis the risks at this site to disturbance. The site is close the shore and there are significant and probable hazards at this location, including earthquake, tsunami, and ocean inundation from high tides and storm waves. A storm from the north a couple years ago overtopped and blew out the berm along the Olympic Discovery Trail a short distance to the east. This is not a stable location, rather it is a dynamic shoreline bordering a large exposed ocean waterbody. This reality supports a full cleanup, not just a coverup of soils and sediments. Remove all contaminated soils and sediments from the site.
- Risks increase with time due to the inevitable impacts of climate change and sea level rise, and the natural process that will cause deterioration of the site. If contaminated soils and sediment are left

on the site, monitoring will need to continue indefinitely, not just for 30 years. This is a cost to be included. Also repair to the site in the indefinite future needs to be include in your analysis.

- Your analysis needs to include short- and long-term protection of the environment and public health. Rayonier can afford this cleanup, so Option 5 is not just providing the most benefit, it is also financially feasible to the responsible party.
- Ensure Ennis Creek is restored to its original shape and given space to allow the connectivity and natural dynamics essential for a salmon stream. This includes restoring the brackish water zone at the mouth of Ennis Creek. All benefits or fully restoring the mouth of Ennis Creek should be included in Ecology's analysis.
- Ecology needs to support returning this area to its natural state to attract and support upland wildlife and connect it with the wildlife corridor to the east towards Sequim and Jefferson County. These benefits should be included in the analysis.
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- Any remaining polluted areas, in particular any upland areas need to be surrounded with solid and high fencing along with large signs that fully inform the public of the cleanup and the importance of staying off the site.
- Ecology needs to ensure that the public is updated as the cleanup moves forward. In addition, Option 3 would require regular updates of site conditions, while Option 5 allows minimal monitoring and reporting. These are additional costs to consider.

Thank you for consideration of my comments.



Piper, Dave

Date: 8/12/25
Method: Website
Comment: See below.

Let's get it right, i.e., a complete and permanent cleanup. Remove the contaminated soils — all of it! If Alternative SL-5 is the best we can possibly do to achieve a complete and permanent cleanup, then let's do that! Let's not leave a toxic waste dump that future generations will have to deal with!

Popinski, John

Date: 8/9/25
Method: Website
Comment: See below.

I am writing to support Level 5 cleanup of the former Rayonier Mill site in Port Angeles, WA

Level 5 cleanup is the ONLY option that the Dept. of Ecology should consider for the former Rayonier Mill site in Port Angeles, WA.

Anything less is a complete waste of monies and resources as well as a failure to our environment.

R, Lois

Date: 8/12/25
Method: Website
Comment: See below.

I do not live in Port Angeles, but have been a frequent visitor over the years and have strong family connections to the region. I care deeply about this issue.

A full cleanup of the former Rayonier site may be more expensive, but in the long run, it's the only way that the site can ever reach its full environmental, cultural, and economic potential. A partial clean-up with capped, toxic materials remaining on site will only delay a revisiting of the issue. In such a location, along the water, in a seismically active area, and with entropy governing the universe, it's only a matter of time before the toxic materials again pose a threat to people and the broader environment.

Again, I strongly urge the Washington State Dept of Ecology to pursue a full clean-up at the Port Angeles Rayonier site.

Radich, Andrea

Date: 7/27/25
Method: Website
Comment: See below.

Port Angeles needs a permanent, resilient solution to the contamination Rayonier has left on, and in, our beautiful harbor. To that end, SL-5 is a much less complicated solution that will not require a long-term commitment to maintenance by so-far negligent owners.

SL-5 would also allow use of ALL of this valuable waterfront property for our city, which we need.

It is also evident that SL-3 is more complex than SL-5 to design and maintain. Thus the cost estimates are not believable.

We need a permanent, resilient solution and that is SL-5.

Rattle, Margaret

Date: 8/12/25
Method: Website
Comment: See below.

I believe the solution of a covered pile of hazardous materials, left by the Strait and Olympic Discovery Trail to be unacceptable.

It should be completely removed.

Reandeau, Kenneth

Date: 8/10/25
Method: Website
Comment: See below.

Greetings DOE of Washington State. I am a lifetime resident of Port Angeles. I would prefer the option that provides the most removal of contaminated materials from the Rayonier site.

Reid, Nancy

Date: 7/28/25
Method: Website
Comment: See below.

SL5 is not just preferable, it provides a complete and permanent cleanup. This is the only viable way forward - we've put up with environmental destruction at the Rainier mill site way too long. Let's take the correct environmental action now.

Reinwald, Alexandra

Date: 8/9/25
Method: Website
Comment: See below.

Re: Draft Interim Action Plan.

I do not believe that the proposed cleanup plan SL3 goes far enough.I am in support of cleanup alternate plan SL5.

Renault, Phillip

Date: 8/12/25
Method: Website
Comment: See below.

As a resident of the Gales Addition I feel that the best option for the former Rayonier Mill site is option 5, the complete removal of all contaminants. I graduated as a Geological Engineer from the University of Arizona and worked around heap leached mines. As a trained engineer I question the impermanence of the proposal the DOE has put forth - option 3 is impermanent and what this community needs and deserves from Rayonier is a permanent full solution to the pollution of their public space. Port Angeles is in a geologically unstable area. This amplifies and underscores the need to remove the contaminants away from the water's edge and away from the edge of the harbor. The best way to do this is to require Rayonier to clean up to the level described in DOE's option 5. The only way to guarantee the safety of the residents of Port Angeles is to remove the chances of exposure that will happen after a geologically catastrophic event.

Renault, Phillip

Date: 8/12/25
Method: Email
Comment: See below.

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Phillip Renault

Reynolds, Kim

Date: 8/10/25
Method: Email
Comment: See below.

Dear Ms. Abbett

I urge the Washington Department of Ecology to select Alternative SL-5 for the former Rayonier Mill site in Port Angeles. SL-5 offers a permanent cleanup that supports the City's Comprehensive Plan and allows for future development.

Alternative SL-3 is unacceptable. It leaves contaminated soil in place under a capped mound, creating perpetual maintenance needs, risk of failure, and a permanent 7-foot-high, 10-acre eyesore that limits development in a community with few available sites.

Independent analysis shows SL-3's costs are underestimated and SL-5's are overstated. The proposed 10-year cleanup is far too long—Port Angeles and the Olympic Peninsula have already waited nearly 30 years. It's time for a lasting solution and accountability. Select SL-5 and require Rayonier to meet an accelerated, reasonable schedule.

Thank You

Kim Reynolds

Reynolds, Kim on behalf of Cruise Planners

Date: 8/10/25
Method: Website
Comment: See below.

I urge the Washington Department of Ecology to select Alternative SL-5 for the former Rayonier Mill site in Port Angeles. SL-5 offers a permanent cleanup that supports the City's Comprehensive Plan and allows for future development.

Alternative SL-3 is unacceptable. It leaves contaminated soil in place under a capped mound, creating perpetual maintenance needs, risk of failure, and a permanent 7-foot-high, 10-acre eyesore that limits development in a community with few available sites.

Independent analysis shows SL-3's costs are underestimated and SL-5's are overstated. The proposed 10-year cleanup is far too long—Port Angeles and the Olympic Peninsula have already waited nearly 30 years. It's time for a lasting solution and accountability. Select SL-5 and require Rayonier to meet an accelerated, reasonable schedule.

Rial, Daniel

Date: 7/24/25
Method: Email
Comment: See below.

From: Daniel Rial mertensiano@gmail.com
Sent: Thursday, July 24, 2025 9:11 PM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Subject: Port Angeles Rayonier Mill cleanup

TO:
Marian Abbett, Site Manager
WA Department of Ecology
PO Box 47775
Olympia, WA 98504-7775
< Marian.Abbett@ecy.wa.gov >

I support option SL-5, which would remove all of the contaminated soil from the Port Angeles Rayonier Mill site and truck it to a landfill designed to handle toxic soil.

Daniel Rial
Clallam County resident

Richards, Ronald

Date: 8/2/25
Method: Website
Comment: See below.

I am shocked that after almost three decades of mostly Democratic controlled administrations in Washington State that Rayonier has been held, and is being held, to such low standards in the cleanup of the old Rayonier mill site. It is mind boggling that the creosote treated pilings are still in place, still polluting the Strait of Juan de Fuca, and still harming sea life and migrating salmon, both out migrants and in migrants. And the plan to store the contaminated soils on site is just as unfathomable, helped along by overstated costs of removal and understated costs of on-site storage. Please demonstrate that Ecology has the people's interests in mind, as opposed to Rayonier's, and require cleanup to the maximum level.

Riski, Rich

Date: 7/28/25
Method: Website
Comment: See below.

Dear WA Dept. of Ecology officials:

I strongly support the extraction and full removal of toxic waste material from the former Rayonier Mill in Port Angeles, as described in Option 5 and recently advocated by the Port Angeles City Council.

Such actions will be costly and time-consuming. However it is the responsible and ethical course of action necessary from a corporate player who gained historic profits from the labors of local workers and left behind decades of waste. The time for measured negotiations is long past.

The Department of Ecology has been witness to this long-running environmental violation. It needs to act decisively to begin the first steps of cleaning up and restoring the Port Angeles waterfront and Ennis Creek estuary ecosystem.

A full clean up will help some measure of biological restoration begin in our community that relies so heavily on recreation and ecotourism.

Sincerely,

R. Riski

Rivard, Mary

Date: 8/6/25
Method: Website
Comment: See below.

I have studied the Rayonier Mill cleanup issue and attended the City Council meeting where they voted in favor of Option 5 cleanup plan, which I also favor. I lived 14 years 3 blocks from GasWorks Park, and recall when the City of Seattle put up signs not to swim in Lake Union because the toxic stew that was capped years ago was documented to be leaking tar balls into Lake Union. That cleanup still has not been dealt with. Port Angeles needs to get the funding from Rayonier to do a thorough cleanup of the land and adjacent underwater ground. It will only get more complicated, expensive.

I just read GasWorks Park issue online from Terrain.org “A Toxic Mess: Seattle's GasWorks Park and The Politics of Environmental Cleanup” by Amber Wong, Oct. 16, 2023.

Roberts, Abi on behalf of the Olympic Region Clean Air Agency (ORCAA)

Date: 6/23/25
Method: Email
Comment: See the following five pages.

From: SEPA SEPA@orcaa.org
Sent: Monday, June 23, 2025 9:58 AM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
*Subject: ORCAA Comments on SEPA#202502471 - Rayonier Mill Study Area Remedial Actions, Former Rayonier Port Angeles Mill Site (project_*

Good Day,

Olympic Region Clean Air Agency (ORCAA) reviewed the proposal for the Rayonier Mill Study Area Remedial Actions, located at 700 N Ennis St in Port Angeles, WA. ORCAA has the following comments for the applicant:

Olympic Region Clean Air Agency (ORCAA) is a local government agency charged with regulatory and enforcement authority for air quality in Clallam, Grays Harbor, Jefferson, Mason, Pacific, and Thurston counties. In general, ORCAA's approval is required before constructing an air pollution source. If you are unsure about whether a permit from ORCAA is required for this proposal, please contact our office at 360-539-7610 for assistance. Attached are two focus sheets which broadly cover when a permit from ORCAA is required, and what the process looks like once ORCAA receives a permit application. Additional information is on ORCAA's website at: https://www.orcaa.org/forbusiness/permits-regstration-standards/ .

Thank you for the opportunity to comment.

Best Regards,

Abi Roberts, Engineer I

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Olympic Region Clean Air Agency

2940 Limited Lane NW

Olympia, WA 98502

Office – (360) 539-7610 x 106

www.orcaa.org

Please take notice that any records or communications with ORCAA are subject to public disclosure under the Public Records Act (RCW 42.56) unless exempt under applicable law.

Focus on When an Air Permit is Required

Approval is Required Before Constructing, Modifying, or Restarting an Air Pollution Source



Olympic Region Clean Air Agency (ORCAA) rules[1] require approval of an air permit application prior to commencing any of the following actions involving facilities, stationary equipment or operations that emit air pollution, which are generally referred to as "sources":

- **New Sources** - Constructing, installing, or establishing stationary equipment, operations or an entire facility that emits air pollution.
- **Replacements** - Replacing an existing source, even "in-kind" replacements.
- **Modifications** - Modifying an existing source, which includes physical changes or changes in the method of operation of the source that have the potential to increase air pollutant emissions.
- **Replacing/Altering Control Devices** - Replacing or substantially altering any air pollution control device, like a baghouse or dust collector.
- **Restarting a Facility** - Reopening and restarting an existing facility or restarting a piece of equipment that has been shut down and not registered with ORCAA for over a year.
- **Establishing Portable/Temporary Equipment** - Moving portable, temporary equipment that emit air pollution to a facility like generators or boilers.

The purpose of this requirement is to protect public health and welfare by assuring compliance with applicable equipment performance standards, air pollution control requirements, and ambient air quality standards. Failure to secure ORCAA's approval prior to commencing any of the above-listed actions is a violation of ORCAA Rule 6.1 and could be subject to penalty. Securing approval before starting a project helps save and protects your project from costly delays and possible enforcement. In addition, facilities that are major sources (per Chapter 173-401 WAC) may require an Air Operating Permit that must be renewed every five years.

When is ORCAA's Approval Required?

For all projects subject to an air permit, ORCAA's approval is required before commencing construction or re-starting equipment that has been shut down, even when re-opening a formerly operating facility that was previously registered with ORCAA. Most often, this means before breaking ground, pouring foundations, conducting electrical or plumbing work, or moving equipment that emits air pollution to the facility. For actions that require an air permit but do not involve construction activities, ORCAA's approval is required before initiating or taking the action. As such, ORCAA recommends against purchasing any equipment that emits air pollution (including air pollution control devices) until ORCAA's approval is secured.

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[1] ORCAA rules are pursuant to requirements of Washington's Clean Air Act under 70A.15 of the Revised Code of Washington.

Focus on When an Air Permit is Required

Modifications

Modifications requiring an air permit include both physical changes and changes in the method of operation of a source resulting in increasing emission rates or potential to emit. Some examples of modifications triggering an air permit that are changes in the method of operation include, but are not limited to:

- Changing the type of fuel combusted
- Changing to a raw material containing a new or higher concentration of a substance
- Changing operation of an existing piece of equipment
- Increasing production rates above those previously approved by ORCAA
- Rebuilding a piece of equipment or control device after a fire or other catastrophic event
- Removing a "bottle-neck" in a process resulting in increasing air pollutant emissions

Restarting a Facility

Facilities that have been shut down (ceased operation for more than 12-months and not registered with ORCAA) must submit an air permit application and secure ORCAA's approval prior to commencing construction or re-starting equipment as described above. If construction activities are not involved to restart a facility, ORCAA's approval is required prior to starting operation.

Are there any exemptions?

Yes. ORCAA's Rule 6.1(c) lists over 100 categorical exemptions or you may qualify for an exemption based on de minimis emissions under ORCAA Rule 6.4, which is a streamlined process for projects with minor air emissions. Call ORCAA for details on exemption, (360) 539-7610 or www.orcaa.org

Approval Process

The air permit required in all cases described above is a "New Source Review" permit referred to as a Notice of Construction (NOC). The NOC process is initiated by submitting a **NOC application** to ORCAA. The approval process may take anywhere from 15 days to several months to complete (see ORCAA Focus Sheet: Air Permit Approval Process). For certain proposals, a **public notice and comment period** and **public hearing** may be required. Therefore, it is important to contact ORCAA early to get a project-specific estimate of the approval timeline. The general NOC approval timeline follows the timeline allowed under the Washington Clean Air Act (Chapter 70A.15 of the Revised Code of Washington).

Upon concluding a project can be approved, ORCAA will issue an Order of Approval. The Order of Approval is the air permit and will include emissions and operating limits, and associated requirements like monitoring, testing, recordkeeping, and reporting requirements. Final Orders of Approval issued by ORCAA may be appealed to the Washington Pollution Control Hearings Board (PCHB) within 30 days from receiving the order. Please visit the PCHB's website for procedures and details related to appeals.

Does ORCAA offer application assistance?

Yes. Information specific to industry categories that are common air pollution sources are provided under ORCAA's Business Assistance web page, www.orcaa.org. You may also contact ORCAA's Engineering Staff directly to ask questions regarding your proposed project, (360) 539-7610.

Focus on Air Permit Approval Process

Process/Timeline for Air Permit[1] Approval

Many projects involving equipment or operations that emit air pollution require approval of an air permit by the Olympic Region Clean Air agency (ORCAA) referred to as a Notice of Construction (NOC). For information on when projects trigger this requirement, see ORCAA's focus sheet, *When is an Air Permit Required?* The NOC process is initiated by submitting a NOC application to ORCAA. The approval process may take anywhere from 15 days to several months to complete. For certain proposals, a **public notice and comment period** and **public hearing** may be required. Therefore, it is important to contact ORCAA early to get a project-specific estimate of the approval timeline. The NOC approval timeline (see back of page for flowchart) adheres to the Washington Clean Air Act (Chapter 70A.15 of the Revised Code of Washington):

NOC Approval Process

Receipt of NOC application	Day 1
Public Notice of the NOC application	15 days from website posting
Application Completeness Determination	Up to 30 days from day 1
Review and Preliminary Determination	Up to 60 days from complete application
Final Determination	15 to 120 days from complete application

Special Circumstances (if required)

30-day Public Comment period triggered	adds a minimum of 30 days
Public hearing required	adds 30 days (may run concurrent with public comment period)
Project Appealed	Approval may be stayed during an appeal[2].

Integration with SEPA

Many projects requiring a NOC also trigger a State Environmental Policy Act (SEPA) review. If this is the case, ORCAA cannot approve the NOC application until a SEPA determination has been issued. ORCAA recommends working with the city or county SEPA "Lead Agency" prior to, or at least simultaneously with, submitting a NOC application to find out SEPA requirements for a project. If required, ORCAA may be the Lead Agency for a project, but this is rare.

Approval

Upon concluding a project can be approved, ORCAA will issue an Order of Approval. The Order of Approval is the air permit for the source and will include emissions and operating limits and associated requirements like monitoring, testing, recordkeeping, and reporting requirements. Final Orders of Approval issued by ORCAA may be appealed to the Washington Pollution Control Hearings Board (PCHB) within 30 days from receiving the order. Please visit the PCHB's website for procedures and details related to appeals.

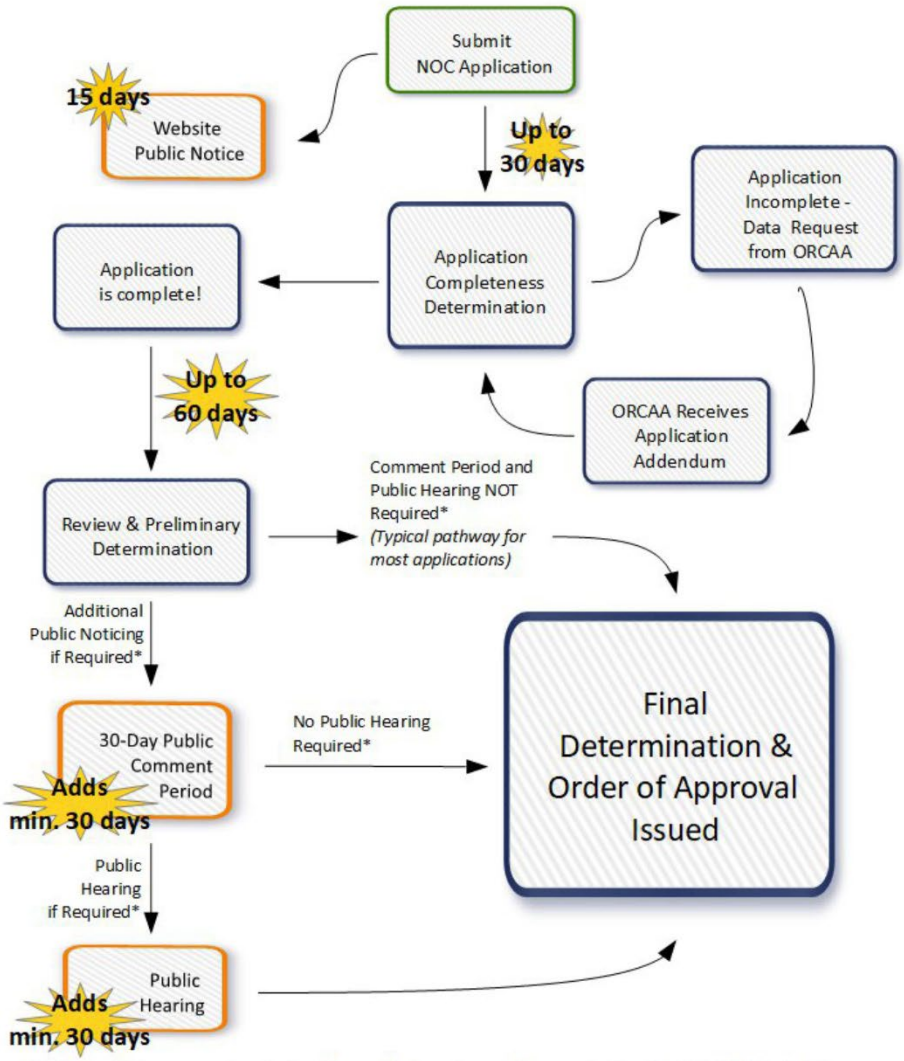
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[1] This focus sheet covers "New Source Review" permits. Please see our website for information about Air Operating Permits for major sources.

[2] Effectiveness of an Order of Approval may be stayed by either ORCAA in accordance with Rule 1.8(c), or by the Washington Pollution Control Hearings Board (PCHB).

Focus on Air Permit Approval Process

NOC Approval Timeline Overview



*30-day public comment period and/or public hearing may be required under ORCAA Rule 6.1.3.
The 30-day public comment period and notice of hearing may run concurrently for one 30-day period.

Roberts, Monica

Date: 8/12/25
Method: Website
Comment: See below.

I appreciate the effort to come to an agreement on a cleanup plan for the old Rayonier site. When I walk or cycle by, I am sadden that this precious and accessible shoreline is unavailable for all. I wonder what the area does to the wildlife already using the site.

I support option 5 with the Port Angeles City Council. I can imagine the next generations considering various use options for this land and I would hate for us to sell them short by leaving tons of toxic soil under either a porus soil cap or an asphalt parking lot. I wonder how the option of leaving toxic soil will fair if we experience sea level rise.

Please choose the option which will best serve the next generations. We owe it to them.

Robins, Betsy

Date: 7/30/25
Method: Email
Comment: See below.

From: Betsy Robins betsyrobins114@gmail.com
Sent: Wednesday, July 30, 2025 12:01 PM
To: Sixkiller, Casey (ECY) csix461@ECY.WA.GOV
Subject: Rayonier site cleanup.

Please plan for a complete clean up. The concerns and costs going forward make this the only sensible resolution. That site is incredibly valuable and will pay back the cleanup cost many times over when it is finally allowed to develop.

Thank you,

Betsy Robins
114 N Peabody St
Port Angeles WA 98362

Rogatz, Janet

Date: 8/11/25
Method: Email
Comment: See below.

There is no question that a complete clean up should take place at the former Rayonier site.

Capping materials and leaving in place is more convenient and less expensive but those considerations should not be the deciding factor.

I support SL-5, a complete cleanup.

Janet Rogatz
Sequim

Rossman, Ilona

Date: 7/21/25
Method: Website
Comment: See below.

Remove ALL contaminants - don't cover up and monitor to make sure severe weather, earthquakes, tsunamis, people and animals haven't caused leaks that could increase cancer exposure. Why has Ecology determined that removing some contaminants are too high compared to benefits, yet the value of the fish — culturally and commercially — isn't counted in that equation?

S, Emily

Date: 8/11/25
Method: Website
Comment: See below.

I have recently become aware that Rayonier is responsible for the hiring of consultants who estimate the costs of preferred solutions and is overseen by the Department of Ecology (also known as the DOE).

I believe DOE to be negligent in their oversight of costs and benefits estimates.

The DOE informed us that SL3 had to be the choice because the cost-benefit ratio was too high, and this was “the law,” an RCW over which they had no control. The fact that the

estimated costs have been minimized in SL3 and exaggerated in SL5 results in a differential of $27 million, which forces SL3 to be the preferred solution by the letter of the law.

After further examination of the cost estimates of SL3, several areas are underestimated and incomplete, for instance, permitting, design and modeling, maintenance, repairs, and monitoring (to be done by Rayonier), plus coordination with sediment work and potential toxicity of untested sediments beneath the current dock as well as unknown protocols necessary for that remediation.

The benefits have been estimated too high and the costs too low for SL3.

How much will it cost when there is damage to the 10-acre capped toxic soil along the waterfront?

There's no modeling for loss of taxes, economic benefits, acts of God, along with sea level rise in these estimates.

SL-5 estimates are higher than expected. Engineering is not as complex, economy of scale, erroneous $75,000 restrictive covenant preparation cost included (which should not be there), and non-construction cost of $6.25 million higher than for SL3, which seems inaccurate as well.

For the benefit of Rayonier, future generations, and the restoration of the estuary and creek, the cleanup should be permanent.

SL5 is permanent and allows property reuse.

How is it possible that in these cost-benefit ratio estimates, there's no financial accounting for the fish, salmonids, and the estuary that is no longer available to them, yet essential to their survival?

SL3 is much more complex.

It involves fencing, signs to limit access, 30 years of post-construction monitoring, an environmental covenant, and a commitment to maintenance by Rayonier.

It should be easy to build, yet SL5 is underscored at 6, as excavation, loading, and transfer are well-known technologies.

On the other hand, SL3 has been over-scored at 9 with complex engineering for erosion-proof 7-foot (possibly more, depending on sediment findings) fenced 10-acre mound, considering sea level change, inclement weather, and an environmental covenant are the factors NOT being considered in this over-scoring of SL3.

Compliance with the Comprehensive Plan is not considered in estimates.

We need a PERMANENT resilient solution and consideration of modeling and repair challenges to design, construct, and maintain the consolidation area. The cost estimate must recognize that SL3 is more complex and will cost more than SL5 to design and maintain.

These discrepancies and oversights make it clear that SL5 is the actual correct choice of preferred solutions.

We request that SL5 be the preferred and permanent solution to this long-delayed toxic cleanup.

Sanderbeck, Kelly

Date: 7/10/25
Method: Website
Comment: See below.

I want to argue that SL5 is the more appropriate proposal, the only practicable solution, considering a Level 9 earthquake (and possible tsunami) is predicted for our area. This is not an 'if' but a 'when.' In addition, climate change will bring rising sea levels, which is also not disputed by scientists. If your criteria for making this decision does not include earthquakes and climate change, then they are not accurate assessments and should be updated. Because of this scientific data and predictions, the cost/benefit leans toward SL5, because having to redo the mitigation far outweighs doing it correctly and permanently the first time. Thank you.

Sanford, Tom on behalf of North Olympic Land Trust

Date: 7/10/25
Method: Website
Comment: See the following two pages.

NORTH OLYMPIC
Land Trust

Farms • Fish • Forests

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North Olympic Land Trust is accountable:

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· Responsible Governance
· Lasting Stewardship

August 4, 2025

Washington State Department of Ecology
Attn: Marian Abbett
PO Box 47775
Olympia, WA 98504-7775

Subject: Public Comment on the Rayonier Mill Cleanup Site and Proposed Interim Action Plan

Dear Marian Abbett,

On behalf of North Olympic Land Trust, a non-profit organization dedicated to conserving the lands and waters of the Olympic Peninsula for the benefit of all, we are pleased to submit this public comment regarding the proposed cleanup actions for the former Rayonier Mill site at the mouth of Ennis Creek. Our mission is to protect the region's natural resources, including important farmland, forestlands, and wildlife habitats. We are specifically and deeply committed to habitat restoration and salmon recovery in the Ennis Creek watershed, where we have conserved a number of properties upstream of the clean-up site. We appreciate the opportunity to provide feedback on this critical matter.

We have reviewed the proposed cleanup documents, including the Draft Interim Action Plan and the Consent Decree. We want to express our strong concern that the current proposal, Option SL-3, is not a sufficiently permanent or protective solution for this vital property. Based on our dedication to the long-term health of this ecosystem, we believe that the Department of Ecology must require the complete removal of all contaminants from the property, as outlined in **Option 5**.

Specifically, we wish to highlight the following points:

- **Flawed Cost Analysis and Long-Term Liability:** The cost estimates for the proposed cleanup options are a critical factor, especially since the Consent Decree will relieve the Potentially Liable Party, Rayonier, of future liability once the cleanup is complete. The published costs appear to undervalue the true long-term expenses of Option SL-3 (on-site capping), which will include perpetual monitoring, maintenance, and the risks associated with natural disasters. Conversely, the cost estimate for a complete removal (Option 5) seems disproportionately high, particularly given that a one-time, permanent cleanup would eliminate these ongoing costs and risks. We believe a revised, more comprehensive cost-benefit

analysis will show that Option 5 is the most responsible and cost-effective long-term solution.

- **Impact on Upstream Conservation and the Natural Environment:** North Olympic Land Trust has conserved a number of properties upstream on Ennis Creek. The proposed cleanup, which involves capping contaminated soil on-site, poses a long-term risk of re-contaminating the environment. We are concerned about the potential for dioxins, furans, PCBs, and other pollutants to migrate from the capped area due to sea level rise and seismic activity, which could impact our protected lands and the broader Port Angeles Harbor ecosystem. A full cleanup is the only way to safeguard our investment in upstream conservation efforts.
- **Water Quality and Habitat Restoration:** Ennis Creek is recognized as the healthiest of Port Angeles' urban streams and is the last best chance for salmon and steelhead habitat in the area. Leaving contaminants buried on-site will continue to threaten water quality and prevent the full recovery of this critical habitat. We urge the Department of Ecology to adopt a permanent solution that supports the full recovery of Ennis Creek and its fish populations through specific restoration actions, including the restoration of the salt marsh at the mouth of the creek, encouragement of meanders along its length, and the removal of all pilings in the nearshore.
- **Respect for Tribal Treaty Rights and Cultural Significance:** The mouth of Ennis Creek is a historically significant site, formerly home to the Lower Elwha Klallam village of I'e'nis. The Tribe has expressed a desire for cleanup that restores the site to a natural state and supports their treaty rights to harvest aquatic resources. We support these goals and believe that a full removal of contaminants (Option 5) is the only way to honor the cultural and historical significance of this location.

We are committed to working collaboratively with the Department of Ecology and other stakeholders, including the Lower Elwha Klallam Tribe and Friends of Ennis Creek, to ensure that the cleanup of the Rayonier Mill site is as complete and protective as possible. Our community has been waiting for over two decades for a final, effective cleanup of this site. We strongly urge the Department of Ecology to seize this opportunity for a permanent and positive resolution for the health of our environment and our community.

Thank you for your time and for the opportunity to comment. We look forward to your response and to continued partnership in environmental stewardship.

Sincerely,



Tom Sanford
Executive Director
North Olympic Land Trust

Santiago, Marilyn

Date: 8/9/25
Method: Website
Comment: See below.

Level 5 cleanup is the ONLY option that the Dept. of Ecology should consider for the former Rayonier Mill site in Port Angeles, WA.

Sarmiento, Nina

Date: 8/7/25
Method: Email
Comment: See below.

August 7th 2025

To Whom It May Concern,

I am writing to strongly oppose the Washington Department of Ecology's proposed "cleanup" plan for the former Rayonier mill site in Port Angeles. The current plan—to pile up toxic waste over 10 acres along the Discovery Trail, cover it with a cap, surround it with a chain-link fence, and declare the job done—is wholly unacceptable.

This is not cleanup. It is containment, and it leaves future generations to deal with a hazardous legacy. The toxins at this site threaten our community's health, our environment, and our economy. Simply capping and fencing the waste will not prevent long-term contamination of the soil, groundwater, or marine waters of Port Angeles Harbor.

The Rayonier company is a profitable corporation and has the financial capacity to fund a complete cleanup. The Department of Ecology's claim that it cannot require full removal due to a "cost-benefit" provision in state law (RCW) is unacceptable. Public health, environmental integrity, and the future of this beautiful waterfront area must outweigh short-term cost calculations.

The Discovery Trail is a beloved public asset, drawing visitors from around the region and beyond. Placing a fenced toxic waste site directly alongside it will harm tourism, diminish our community's reputation, and send a message that industry can pollute without full accountability.

I urge the Department of Ecology to reject the current plan and require a **full removal of contaminated materials** from the site. We have one chance to restore this waterfront

properly. Let’s not settle for a temporary, unsafe, and unsightly solution that compromises our community’s future.

Respectfully,



Nina Sarmiento, Port Angeles

Founder & Guide
Magic Forest Tours
(360) 543- 4970

Schanfald, Darlene on behalf of the Olympic Environmental Council and Protect the Peninsula's Future

Date: 8/5/25
Method: Email
Comment: See the following 10 page.

Olympic ENVIRONMENTAL Council PO Box 2664 Sequim WA 98382

PO Box 421 Sequim WA 98382

August 5, 2025

Marian Abbett, Section Manager
WA State Department of Ecology
PO Box 47775
Olympia WA 98504
Marian.Abbett@ecy.wa.gov

Re: Interim Cleanup Action Program for the Rayonier Mill's Hazardous Waste Cleanup

The Olympic Environmental Council and Protect the Peninsula's Future concur with the 22 July 2025: Port Angeles City Council: Direct staff to submit comments to department of Ecology requesting a complete, timely and high quality cleanup of the Rayonier site including a request that Ecology select disproportionate cost analysis alternative 5. (Motion carried 5-0) An Option 5 cleanup is the morally right thing to do.

Our two organizations have a thirty-year association with this contaminated site beginning with its Mt Pleasant Landfill. We will comment on the ICAP, the AO and the SEPA.
https://www.google.com/search?client=firefox-b-1-e&q=go.ecology.wa.gove%2F2270

First, it is important to include some historical background.
• 1980s Clean Air formed. Its mission was to work with Port Angels Harbor Mill owners to clean up their air emissions. Results failed.
• Around 1990, Clean Air Hotline (CAH) formed. Citizens called the Hotline and described their toxic assault and the geographical area of the occurrence. The calls were mapped with photographs taken of mill emissions from the three operating mills: Rayonier, KPly/PenPly and Daishowa. Over a 5-yr period, 3000 incidents were mapped. Most clustered in the Rayonier area, next in the Daishowa area and last in the KPly area.
• 1990 was the first USEPA Toxics Release Inventory of water, air and soil emissions. It totaled the required toxins emission logs released by industries to the USEPA. Three years in a row, Rayonier ranked the highest polluter in WA State for air, water and soil and the 17^{tth} worst in the nation.
• 1995 Rayonier announced it would create another 5-acre hole at its Mt Pleasant Landfill to dump mill waste. The current 5-acres of mill waste was dumped on clay. The landfill was surrounded by four residential communities. Some dump leachate was directed westward along curbs to the East Fork of Lees Creek eventually emptying into the Strait of Juan de Fuca. Other leachate seeped eastward, downhill into the Four Seasons Park wetland and beyond into Morse Creek through the Four Seasons Ranch. The communities opposed the second landfill hole.
• 1997: Rayonier, unable to renew its air permit from Ecology unless it brought its mill up to code, announced it would close the mill on May 1, 1997. The Olympic Environmental Council (OEC), joined by multiple environmental non profits from western WA and community members, with the help of the National USEPA Ombudsman, petitioned USEPA Region 10 – Seattle office to evaluate the contaminants in the Port Angeles Harbor, on the Rayonier Mill site, soils around town and properties of

the Olympic National Park, and Rayonier's two landfills it owned and Daishowa's that held Rayonier mill waste 25 ft below ground level. EPA complied except for the Daishowa dump. The other sites ranked for the Superfund Priority List. But the cleanup focus remained on the Harbor and upland.
• 2000. Politics forced this site to remain with Ecology's Solid Waste Department, claiming that staff would have the site cleaned up two years earlier than EPA; i.e., in 7 years. Decision makers were Rayonier, Ecology and the Lower Elwha Klallam Tribe (LEKT). In 7 years, little was accomplished besides removing oil soils/groundwater from Ennis Creek. Too, federal resources were contaminated. NOAA, Ecology, the LEKT and the USFWS under Natural Resource Damages Assessment (NRDA) were to determine Rayonier's responsibility.
* 2006-7 The pending Puget Sound Partnership cleanup moved cleanup oversight to Ecology Toxics Cleanup Program under the Model Toxics Control Act. In 2008 three engineers from that department were assigned oversight. They had another sampling of the Harbor waste but only for dioxin. The overlapping OEC data, PPF-Department of Health sub-census-tract-death rates and CAH mapped density of calls helped determine the area of Rayonier's pollution.

From then until now, Ecology found Rayonier did not come willingly but this year, 2025, was able to get Rayonier to sign an Agreed Order.

COMMENTS ON ICAP (Cited page numbers are from the online-electronic copy.)

Overall it is clear that Ecology will insist on cleanup Option 3, some removal of toxic sediments and wharf pilings, instead of a permanent solution to the maximum extent and respect for human health, fish and wildlife. Option 3, a very complex remediation choice, underestimates the costs of having to permit, design, model, maintain, repair, mother nature, fencing, inflation costs, restrictive covenant and, over time, lost economic benefits for the community and the Lower Elwha Tribe. Perhaps this is the best agreement Ecology staff could get from Rayonier, but the community should be Ecology's client, not Rayonier. Hence, Option 5, a full cleanup is needed.

The past health, environment and financial costs the community suffered while the mill operated. High rates of childhood asthma should not be forgotten. General respiratory issues of community members. Devalued private property from Rayonier pollutants. Olympic National Park air quality and tree impacts. Loss of Ennis Creek habitat and salmon. Etc.

6.2.1 P. 38, Last para: *Fencing and signs **may** be installed.* No "may." During the cleanup Rayonier *must* install a tall fence with signs that are large, colorful and include clear language about the purpose of the cleanup and the dangers of accessing the area during cleanup. A good example can be had from the Port of Port Angeles KPly/PenPly cleanup.

6.1: Is the "trustee council" the same as NRDA?
Rayonier and RAMP engaged in multi-year substantive discussions with the Trustee Council to develop a project to restore Ennis Creek as a way to resolve potential natural resource damage (NRD) claims. A settlement has thus far not been reached. What is the issue(s)?

6.1.2 Potential Restoration of Ennis Creek. We concur that it would be beneficial "to conducting restoration and remediation activities simultaneously." (P. 41)

P. 42: 6.2.1 Solid Selected CA Para.1: *Much of the contaminated soil will be consolidated and capped in the west mill area.* This introduces more plastic into the environment. "woven geotextile" breaks down allowing water seepage into the toxic soil releasing the toxins to run off.

Option 5 is the only choice for restoring the area once and for all; no half measures. Option 5 respects the health of the community, public safety and the environment. It accounts for future climatic happenings – sea level rise, storm surges, earthquakes, tsunamis, other. Take note of the July 29, 2025

8.8 Russian earthquake and tsunami that sent warnings across the Pacific including to WA State and the Strait of Juan de Fuca

The additional cleanup cost for the polluter will, in the long rung, be less expensive. There would be no need to monitor the contaminants for decades - whether covered sediments hold or wash away, or whether the toxic soils leach or run off site and re-contaminate the sediments.

Even now there is upland soil leaching. 3.3 Nature and Extent of Contamination 3.3.1, P. 29 Rayonier Mill Interim Action Plan

The soil and groundwater analytical data suggest that PCBs and select metals may have leached from soil to groundwater in some localized areas at concentrations that could present a risk via the groundwater-to-surface water pathway. However, in general, the concentrations of PCBs and metals detected in soil beneath the mill property are relatively low (e.g., most detections are below unrestricted land use soil CULs, a few are two-three times CULs, a very few are at ten times CULs) and the areas where PCBs and metals may have leached to groundwater appear to be limited in spatial extent.

QUESTION: *An environmental covenant will include documentation of the contamination remaining under the cap.* How will the cap be monitored and maintained and how will burrowing animals be removed? (Pp 43 & 72)

Costs will rise over the years. Clean it up and be done with it. This Ecology staff and others invested in seeing the area cleaned up will not be around in 10-30 plus years. Maybe, too, Rayonier entities.

6**.2.3 Sediment Selected Cleanup Action**

Enhanced monitored natural recovery (EMNR), or covering up of the contaminated sediments will not be effective. Ecology states that even if the covering doesn't hold, it will mix with the toxic sediments and decrease the contamination level. (P. 38) That is conceptually irresponsible.

Upon completing the construction, the remediation goals for sediment will be achieved and long-term monitoring will be implemented. (P. 45)

This, too, is irresponsible. Why continue to monitor? Who will be watching in 10 years? In the long run, it will be cost effective and timelier to remove the contamination rather than monitor it.

Wharf infrastructure (decking and maybe pilings) is considered to be left on the upland pad of the mill along with the soils. This is much covering up and insufficient cleanup and removal of dangerous wastes from the community.

The contingent remedies do not restore the original shoreline. The considered shoreline restoration around the upland pad is not the real shoreline. (P. 44) The real shoreline is where the Olympic Discovery Trail (ODT) is sited. We feel the cement pad/concrete foundation should be removed. The area faces considerable weather impacts that supports this. As mentioned above, sea level rise, storm surges, and earthquake faults. Too, the mouth of Ennis Creek is not at the end of the concrete foundation. It is hundreds of feet south at the original shoreline. Restoration to the original shoreline can restore the beach, the salmon habitat, a healthier tribal fishing area, a recreational area, and the nature area it once was.

Consideration of leaving the upland concrete foundation in order for redevelopment is not a realistic idea. Any building of homes, businesses, etc. would face the same climate conditions and would re-contaminate the water, sediments and wildlife.

It is imperative that the soils and sediments be analyzed for PFAS. When early studies were conducted, PFAS was not on anyone's radar. Now it is on everyone's radar and it cannot and should not be dismissed.

6.2.3 Sediment Selected Cleanup Action *Excavated and dredged materials will be sent off-site for disposal or placed in the Upland Study Area soil consolidation area to be determined in the remedial design.* P. 44. Sending these off-site is the correct choice.

6.3.1 ***Only one of the evaluated alternatives can satisfy the requirement to use permanent solutions to the maximum extent practicable. MTCA requires using a disproportionate cost analysis (DCA) to determine which alternative uses permanent solutions to the maximum extent practicable when determining which cleanup action alternative.*** **(P. 46) We place emphasis on "permanent solutions," hence Option 5 would accomplish this goal.**

SUPPLEMENTAL QUESTIONS/COMMENTS:

P. 9, para. 2: How much citizen input was incorporated into the earlier volumes?

P. 14, Para. 1: During its operation, the mill stacks [etc.] released hazardous substances.

Bullet 1, line 7 omission: proposal to use the (insert) "area" in a manner….

P. 15, bullet 4:… sediments…disposal or placed in the Upland Study Area soil consolidation area… Disposal Yes. Placed upland NO!

Bullet 5: Fig. 6-5: SMA-3 and 4 in the figure isn't distinguishable.

The contingent remedies do not restore the original shoreline.

1.3 Regulatory Framework. P. 19: In 2004…Rayonier removed over 30k tons of contaminated soil. Where were they sent to?

P. 25: 3.1 Site Geology and Hydrogeology. Fill material beneath the mill property: Will this be removed and to where?

P. 31 (and elsewhere). "may" is used. Example: Rayonier Mill Interim Action Plan February 2025 Page 27 3.2.2 *Release Mechanisms During pulp mill operations, the following mechanisms may have released COCs from the sources identified in Section 3.2.1:*

"May" is an nappropriate term when addressing that the area was contaminated. If it was "may," we wouldn't be starting a cleanup process.

P. 33 Fig 4-1 When was the last test of the CULs?

P. 40: 6.1.1 Removal of In-Water Structures. Removal of these structures **and re-contouring the shoreline are expected to be a part of the DNR lease closeout. We are pleased to learn that Ecology will ensure the removal should DNR falter. But the shoreline re-contouring must be taken southward to its original site.**

P. 41. Para 3: …"benefits to conducting restoration and remediation activities simultaneously." Explain the difference between the two?

6.2, line 3: Remove the comma after "the" (…is necessary due to the size of the , complexity…)

P. 42: 6.2.1 Solid Selected CA Para. 1: *Much of the contaminated soil will be consolidated and capped in the west mill area.* These should be removed. There should be no capping. Our reasons are stated above.

Last Para: *Fencing and signs **may** be installed!* Fencing and signs will be needed during cleanup operations. These will not be necessary once ALL mill contaminants are removed from the City.

P. 46 **when determining which cleanup action alternative "uses permanent solutions to the maximum extent practicable…"** Option 3 does not account for fish, wildlife or human health. (See P. 43) Comment: #5 is permanent and practicable.

P. 48 Para. 1 Consider inflation in the costs;

Para. 2 "institutional controls " include physical measures like fences, use restrictions and educational programs like signs and postings. Install during cleanup. Remove after all contaminants are removed from the site.

P. 51 6.5 Environmental Justice. Para. 2: Environmental Justice is needed for the fish, as well.
P. 56, bullet 2: Financial assurances. *The implementing agreement to which this draft IAP is an exhibit, requires the PLP to maintain sufficient and adequate financial assurance mechanisms to fund all costs associated with the operation and maintenance of the cleanup action for the Study Area.*

6.10 Periodic Review

Ecology will publish a notice of all periodic reviews in the site register and provide an opportunity for public review and comment by the potentially liable person and the public. If Ecology determines that substantial changes in the cleanup action are necessary to protect human health and the environment at the Site, a revised IAP will be prepared and provided for public review and comment in accordance with WAC 173-340-380 and 173-340-600.

This will take another 25 years! More reviews are unnecessary if Option 5 is chosen.

SEPA

P. 2 DETERMINATION *Ecology has determined that this proposal will not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW43.21C.030(2)(c).*

Include in every recommendation or report on proposals for legislation and other major actions that significantly affecting the quality of the environment, a detailed statement by the responsible official on:

i. the environmental impact of the proposed action;
ii. any adverse environmental effects which cannot be avoided should the proposal be implemented;
iii. alternatives to the proposed action;
iv. the relationship between local short-term uses of the environment and the maintenance and enhancement of long-term productivity; and
v. any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented;

SEPA P. 3 Sediment Cleanup Action

The purpose of this project is to protect human health and the environment by addressing concentrations of metals, dioxin and furans, polychlorinated biphenyls (PCBs), and carcinogenic polycyclic aromatic hydrocarbons (cPAHs), in surface intertidal and subtidal sediments within the Rayonier Mill Study Area portion of Port Angeles Harbor. As such, it is intended to significantly improve, rather than adversely impact, environmental condition

Ecology's DNS is beyond puzzling. This area is a superfund-level site. If the purpose of this project is to protect human health and the environment, the proposed Option 3 will not achieve this. If Option 3 were kept, then an EIS is called for.

P.3 *The project will achieve sediment cleanup levels by excavating or dredging sediment, or applying enhanced monitored natural recover (EMNR) layers to reduce sediment contamination.*

EMNR will not hold. Consider the environmental factors facing this area. The toxic sediments must be removed off-site.

P. 5 *The engineering design will include evaluation of and adaptation to reduce potential impacts from climate change and sea level rise with inclusion of green remediation best management practices and institutional control language.*

This is well meaning, but not doable. EMNR and covering up will not "adapt" to the areas climate conditions. Removal of the contaminants must be the sole goal.

CHECKLIST (Page numbers refer to Checklist page numbers.)
P. 2 in-water work not permitted in the Harbor during 2/16 – 7/14, but on P. 13 *The in-water work window typically occurs between July 16 and January 14.*

P. 9 b,1. *Purge water and sampling water will be contained in drums and disposed of appropriately, such as at a municipally owned treatment facility.* If you mean at a wastewater processing plant, which do not treat much, the purged water will be released right back in to the surface water

c. *Dock materials will be lifted by barge-mounted cranes and placed into transport barges. Nearshore sections may be removed using similar land based equipment. No materials will be allowed to fall into surface water.*

2 "nearshore sections" of the dock? No removal of the cement pad/concrete foundation?

P. 11 5. Animals. According to a local Audubon bird expert:
Heerman's Gulls and Thayer's Gulls are occasional winter species, so it's probably not appropriate to call them "populations". Ducks, guillemots, eagles, owls, and pelicans are not shorebirds. Snowy Owl'sl should probably not be listed, because they have only occurred in irruption years. Their last irruption was 2013, with only a couple birds.

P. 14 7. Environmental Health a. *All contaminated excavated materials will be appropriately disposed of at a Subtitle D landfill, or, placed beneath the cap on the uplands or, subject to further remedial design characterization and as approved by Ecology, suitable excavated sediment and nearshore soils that meet upland cleanup levels may be beneficially reused locally or regionally, as appropriate.* Remove the comma after "or".

Make one plan, not more re: disposal. The "plan" should be to remove these to the Subtitle D landfill. This goes for *Proposed measures to reduce or control environmental health hazards, if any*. (P. 15. 5)

P. 16 LAND AND SHORELINE USE. P. 18 *Per Title 15 Environment, Chapter 15.20.01 Environmentally Sensitive Areas Protection of the Port Angeles Municipal Code (PAMC). The Harbor is a fish and wildlife habitat conservation area and habitat of local importance for migrating fish and wildlife. Historical use in the area has degraded the available marine habitat. Generally, cleanup actions will improve habitat functions compared to existing conditions* . We trust the full cleanup will make this difference.

16. TRANSPORTATION P. 26 g. *... signs will be posted near the Rayonier property during Project design and construction that will include website and contact information to support communication and outreach.*

In addition to "contact information," the sign language and print must clearly, boldly, colorfully and largely include reasons for staying off the cleanup site. A good example are the signs posted by the Port of Port Angeles on the fencing of the PenPly/KPly cleanup.

AGREED ORDER (Using document page numbers)

We are displeased that you would lock **in the cleanup to a coverup. Option 3 will not do.**

P. 3 *This Decree shall not be construed as proof of liability or responsibility for any releases of hazardous substances or cost for remedial action nor an admission of any facts; provided, however, that Defendants shall not challenge the authority of the Attorney General and Ecology to enforce this Decree.*

This makes no sense. Rayonier has already signed as the liable party. This cannot be retracted even by this Consent Decree. And Ecology cannot trust Rayonier will not challenge later on, especially if the cleanup moves to Option 5. This Decree undercuts the authority of Ecology, other agencies and the City of Port Angeles.

P. 4 II JURISDICTION *7. The Court is fully advised of the reasons for entry of this Decree, and good cause having been shown:* What court? At Ecology's July 8, 2025 presentation, we were told Clallam County Court would oversee the agreement.

Then the Decree states: *2. Authority is conferred upon the Washington State Attorney General by RCW 70A.305.040(4)(a) to agree to a settlement with any potentially liable person (PLP) if, after public notice and any required public meeting, Ecology finds the proposed settlement would lead to a more expeditious cleanup of hazardous substances. RCW 70A.305.040(4)(b) requires that such a settlement be entered as a consent decree issued by a court of competent jurisdiction* Is it correct to assume that if Option 5 were selected that authority would be under the WA State Attorney General?

P. 10 S. *The treated timbers and pilings are a possible source of contamination to the marine water and sediment with which they are in contact.* Why do you use the term "possible"? Isn't it a known fact that they are?

P. 17 XI Access To Information: Fencing and signs are omitted. These should be included.

P. 21 XV Amendment of Decree Can the public weigh in on amendments?

P. 22 XVI. EXTENSION OF SCHEDULE Remove "god"

2, C. Acts of God, including fire, flood, blizzard, extreme temperatures, storm, or other unavoidable casualty…

P. 23 XVII Endangerment This section should include workers.

Rayonier has left its contamination marks throughout the City of Port Angeles and Clallam County. Leachate from the Mt Pleasant Landfill that was to be trucked to the city wastewater processing plant has, instead, allowed the truckers to lift a sewer manhole cover on Hwy 101 and pour the

leachate from there. Is the pipe whole or fractured? And at the City landfill where Rayonier dumped its mill infrastructure, is that leachate contaminating aquifers? Attention should be given to these sites.

Darlene Schanfald, Ph.D.
Commenting for the Olympic Environmental Council

Jamie Porter, President
Protect the Peninsula's Future

We will be attaching the May 7, 2015 letter from the Department of Natural Resource comments on the Vol. III Interim Action Report

May 7, 2015

Marian Abbett, Toxics Cleanup Program
Washington State Department of Ecology
P.O. Box 47775
Olympia, WA 98504-7775

Subject: Rayonier Sediment

Dear Ms. Abbett:

The Washington State Department of Natural Resources (DNR) would like to thank you for the opportunity to comment on the Interim Action Report Volume III for the Rayonier, Inc. site in Port Angeles.

DNR's comments are based on principles of stewardship and proprietary management derived from our legislative defined goals to protect State-Owned Aquatic Lands (SOAL) and preserve them for the public's benefit. We appreciate Ecology's consideration of these and any future comments related to the investigation and cleanup of the site.

First, regarding the future use scenarios, DNR supports restoration as part of its role as a steward of State-Owned Aquatic Lands. Removal of the dock and jetty structures will help to restore this portion of the bay to a more natural state and allow a wider range of remedial alternatives for contaminated sediments near these structures. DNR supports removal of the dock and jetty as described in future use scenario 1. This removal would ideally be performed in coordination with sediment remediation activities to reduce the potential impact of any disturbed contaminated sediments. Removal of the dock and jetty will also reduce constraints on the implementation any future remediation work.

Secondly, regarding Appendix B's analysis of sediment remediation technologies, DNR is concerned that any potential design for fill/capping balance the need for an effective remediation of contamination, potential future uses that may be constrained by capping, and appropriateness of any armoring material for the potential restoration of the site to a functioning habitat for aquatic organisms.

Finally, regarding Appendix C's analysis of remedial alternatives, DNR is supportive of alternatives that incorporate permanent, effective remediation technologies. Where feasible, DNR supports removal of contaminated sediments, especially in the log pond and in the most contaminated areas of the dock footprint. DNR supports enhanced natural recovery where sediment contaminant concentrations are lower if designed appropriately for future uses and

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RECYCLED PAPER

sediment transport. In the case of both the fill/cap areas and enhanced natural recovery areas, DNR requests that the potential for sediment erosion or vessel scour be considered in the final remedial design. Because institutional controls will likely be required to ensure long term performance and efficacy of these remedial alternatives, DNR acknowledges that coordination will be required from the agency in its role as land manager. These institutional controls will likely place restrictions on the ways the resources of State-Owned Aquatic Land may be utilized by the people of Washington State, including potential limitation to shellfish harvesting, short term anchoring, restoration of habitat, and general public access. These restrictions should be weighed in the evaluation of the costs and benefits of these remediation technologies.

Sincerely,

Erika A Shaffer, MS
Aquatics Division, Sediment Specialist

Schmid, Edward

Date: 8/11/25
Method: Website
Comment: See below.

Please pursue the highest level of de-contamination possible, removing ALL toxins from the site.

Ed schmid

Schmitt, Joe

Date: 7/11/25
Method: Email
Comment: See below.

From: Joe Schmitt whiskeycreekbeach@gmail.com
Sent: Friday, July 11, 2025 12:44 PM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Subject: Public Comment Submission – Port Angeles Rayonier Mill Study Area Cleanup

You need to get this done. So far its been a joke. Rayonier is stalling and no way should this drug out so long They and you are dragging this out nearly as long as the mill ran.

Captain Joe Schmitt
Whiskey Creek Marine services
360 460 0025

Scholl, Carole

Date: 8/11/25
Method: Website
Comment: See below.

I'm a resident of Port Angeles and very supportive of our tourism business. Let's finish this clean up and enhance our waterfront. So, I am writing to support Level 5 cleanup of the former Rayonier Mill site in Port Angeles. Level 5 cleanup is the ONLY option that the Dept. of Ecology should consider for the former Rayonier Mill site in Port Angeles, WA.

Schorr, Anna

Date: 8/10/25
Method: Website
Comment: See below.

PLEASE CLEAN UP THIS SITE- it is a sore on our community - it is blighted property and it is not fair to the future generations or the current to leave this contaminated site fence off still haunted by our ancestors mistake.

Additionally this location has historical significance to the local Elwah tribe as a burial ground. We should prioritize cleaning this space and opening it back up, so the tribe, as well as the community can be reunited with this space.

There is no point to do the job halfway - we have decided to address this hazard zone, we should do it properly so future generations do not need to finish our work that is redudant and a waste of tax payers dollars.

Lastly he benefits of SL5 are vastly understated, and the cost of SL3 are underestimated. For example, the value of this prime waterfront property to the community, economy, and environment is not accounted for.

Schouten, Arnold

Date: 8/10/25
Method: Website
Comment: See below.

I am writing as a concerned citizen and a member of the Port Angeles community to express my strong support for Alternative SL5 for the cleanup of the former Rayonier mill site. This is a critical issue for the long-term health of our community and the unique marine habitat of our waterfront.

The Port Angeles waterfront is a vital resource and a home to critical species, including our endangered Southern Resident killer whales, salmon, and migratory birds. The contamination at the mill site, including PCBs, dioxin, and heavy metals, poses a significant and ongoing threat to this sensitive ecosystem.

Alternative SL3, which involves simply capping the site, is not a permanent solution. This temporary fix ignores the very real risks of sea-level rise, coastal erosion, earthquakes, and floods that could breach the cap and re-release pollutants into our waters.

A complete and permanent cleanup is long overdue. I urge you to select Alternative SL5, which involves the full removal of all contaminated soil. This is the only lasting solution that will truly protect our community and our environment for generations to come.

I believe the benefits of SL5 are vastly understated, and the costs of SL3 are not accurately estimated. The long-term health of our community is a benefit that cannot be measured in simple terms.

As a resident and business owner for over 50 years in Port Angeles, I feel it has taken an unacceptable period of time to complete this remediation. SL5 is the only long term safe effective solution for the environment and community.

Schouten, Debra

Date: 8/10/25
Method: Website
Comment: See below.

I am writing as a concerned citizen and a member of the Port Angeles community to express my strong support for Alternative SL5 for the cleanup of the former Rayonier mill site. This is a critical issue for the long-term health of our community and the unique marine habitat of our waterfront.

The Port Angeles waterfront is a vital resource and a home to critical species, including our endangered Southern Resident killer whales, salmon, and migratory birds. The contamination at the mill site, including PCBs, dioxin, and heavy metals, poses a significant and ongoing threat to this sensitive ecosystem.

Alternative SL3, which involves simply capping the site, is not a permanent solution. This temporary fix ignores the very real risks of sea-level rise, coastal erosion, earthquakes, and floods that could breach the cap and re-release pollutants into our waters.

A complete and permanent cleanup is long overdue. I urge you to select Alternative SL5, which involves the full removal of all contaminated soil. This is the only lasting solution that will truly protect our community and our environment for generations to come.

I believe the benefits of SL5 are vastly understated, and the costs of SL3 are not accurately estimated. The long-term health of our community is a benefit that cannot be measured in simple terms.

The Port Angeles waterfront needs this vital piece of real estate for economic development and protection and health of the marine environment. This property could be developed into a world class destination. It is devastating that a proper clean-up has not taken place

after closing the mill 28 years ago. A delayed total clean-up proposal has continued year after year without adequate results. After all this time, here is another proposal for an additional 10 years offering an ineffective solution. The right action, solution and outcome are possible.

Please, for the sake of our community and our environment, choose Alternative SL5.

Sincerely,

Debra Schouten

Scouten, Michele

Date: 8/10/25
Method: Website
Comment: See below.

I am writing as a concerned citizen and a member of the Port Angeles community to express my strong support for Alternative SL5 for the cleanup of the former Rayonier mill site. This is a critical issue for the long-term health of our community and the unique marine habitat of our waterfront.

The Port Angeles waterfront is a vital resource and a home to critical species, including our endangered Southern Resident killer whales, salmon, and migratory birds. The contamination at the mill site, including PCBs, dioxin, and heavy metals, poses a significant and ongoing threat to this sensitive ecosystem.

Alternative SL3, which involves simply capping the site, is not a permanent solution. This temporary fix ignores the very real risks of sea-level rise, coastal erosion, earthquakes, and floods that could breach the cap and re-release pollutants into our waters.

A complete and permanent cleanup is long overdue. I urge you to select Alternative SL5, which involves the full removal of all contaminated soil. This is the only lasting solution that will truly protect our community and our environment for generations to come.

I believe the benefits of SL5 are vastly understated, and the costs of SL3 are not accurately estimated. The long-term health of our community is a benefit that cannot be measured in simple terms.

The mill site borders part of the Olympic Discovery Trail, which is heavily used in Port Angeles by both residents and tourists alike. The mill site is currently an eyesore, to say the least. We need a permanent clean-up of this site to return it to its natural beauty and to improve the health of the ecosystem.

Please, for the sake of our community and our environment, choose Alternative SL5.

Sextro, Robert

Date: 8/8/25
Method: Website
Comment: See the following two pages.

6 August 2025

Ms Marion Abbett
Department of Ecology
PO Box 47775
Olympia WA. 98504

Subject: Comments on the Port Angeles Rayonier Mill SEPA Determination and Checklist (dated June 2025), and the Rayonier Mill Interim Action Plan (Dated February 2025)

Dear Marion:

I believe that this site and the area around it including Ennis Creek are important conservation and recreation areas in the heart of Port Angeles and they must be remediated as thoroughly as practicable. Furthermore, I attended a special city council meeting held in Port Angeles on 22 July 2025 where they passed a motion (that I agree with) to direct staff to submit comments to Department of Ecology (DOE) requesting a complete, timely and high quality cleanup of the Rayonier Mill site including a request that DOE select disproportionate cost analysis (DCA) alternative SL-5.

Unfortunately, neither the 2021 Interim Action Report, Volume III, or this current Interim Action Plan, were prepared (and remedial alternatives evaluated) considering what is stated in the last bullet of the SEPA checklist, "impacts from climate change, sea level rise and the predicted Cascadia earthquake event(s) with subsequent tsunamis! This leads me to believe that virtually all remedial alternatives evaluated and scored are potentially incorrect since I (and the concerned public) do not know what would happen to the 10 acre capped area when one or more of these events takes place. Contaminants could be spread and exposure pathways completed. For example, would a 100-year or 500-year flood of Ennis Creek destroy the integrity of only the eastern portion of the capped area or the entire capped area? Not knowing answers to these type of questions leads me to believe that the only "permanent" remedial option for the site is complete removal of contaminants, or SL-5 and S-5.

Comments on the SEPA checklist:

Bulleted list, last bullet, on page 5 under Upland Cleanup Action, re-word mid-bullet to read "impacts from climate change, sea level rise and the predicted Cascadia earthquake event(s) with subsequent tsunamis with".

Actual Checklist, Section B.3.5, Does the proposal lie within a 100-year floodplain? Would recommend expansion of this question to also include "within a 500-year floodplain" due to the greater likelihood of this severe event given our current climate change scenarios. Also, your initial answer says "see attached map" but there is no attached floodplain map. Please attach a map or two as needed to show the different floodplains.

Additionally, if for some reason DOE moves forward with alternative SL-3, which leaves the majority of the contaminated soils and sediments on site, then DOE must prepare an Environmental Impact Statement (EIS) as I believe it would no longer be considered an action/ remedy of non-significance, but rather has the potential to result in significant environmental impacts when considered in the context of climate change and predicted Cascadia events.

Comments on the Interim Action Plan:

Section 3.1, Site Geology and Hydrogeology, for the "flat" portion of the Upland Study Area provide the general height of that area compared to mean sea level (MSL). This is important data to have when evaluating the effect of King-tides combined with storm surge or tsunamis would have on the site and capped area.

Comments on Next Steps in Section 7:

Since by your own admission at the public meeting on 8 July 2025 the remedial alternatives for soil and sediment at this site have not been evaluated in the context of climate change, sea level rise and Cascadia events, this section requires a narrative description of how and when DOE will orchestrate integration of these events and the findings identified. There needs to be a discussion of how and when the remedial alternatives will be re-scored for the MTCA criteria, and potentially re-ranked based on any revisions to the disproportionate cost analysis (DCA).

For example, what if this site and areas of heavy fill are identified as being in a liquefaction zone which could cause portions or all of the site to "sink" during a Cascadia event thereby breaking down the capped area re-releasing contaminated soils and sediments back into the environment. This would certainly seem to initiate a re-evaluation of the scoring to the protectiveness, permanence, long-term effectiveness, and consideration of public concerns criteria.

Because of the complexity of this site located along the coast and potentially highly effected by climate change events and earthquake events (including tsunamis), future remedial design work including hydrodynamic modeling and the drafting of a pre-remedial design Work Plan must allow for a public review and comment cycle. I believe that the public needs this type of informational detail to better understand the effects these types of catastrophic events will have on the site especially for contaminated media consolidated and left on site!

Thank you in advance for your consideration of our comments, concerns, and questions.

Bob Sextro
1323 1/2 McDonald Street
Port Angeles WA 98363
(360) 808-2672

Sextro, Robert on behalf of the North Olympic Group of the WA State Chapter of the Sierra Club

Date: 8/8/25
Method: Website
Comment: See the following three pages.

SIERRA CLUB
North Olympic Group,
P.O. Box 2664
Sequim, WA 98362

Ms Marion Abbett
Department of Ecology
PO Box 47775
Olympia WA. 98504

10 August 2025

Subject: Comments on the Port Angeles Rayonier Mill SEPA Determination and Checklist (dated June 2025), and the Rayonier Mill Interim Action Plan (Dated February 2025)

Dear Marion:

The North Olympic Group of the Washington State Chapter of the Sierra Club is writing you on behalf of our several hundred members that live, work and recreate in the Port Angeles area. We believe that this site and the area around it including Ennis Creek are important conservation and recreation areas in the heart of Port Angeles and they must be remediated as thoroughly as practicable.

Firstly, the Sierra Club agrees with the City of Port Angeles's motion to direct staff to submit comments to Department of Ecology (DOE) requesting a complete, timely and high quality cleanup of the Rayonier Mill site including a request that DOE select disproportionate cost analysis (DCA) alternative SL-5. Representatives from the Lower Elwha Klallam Tribe (LEKT) were present during the vote on this motion and agreed with the outcome and the call for a complete site cleanup including restoration of Ennis Creek.

Comments on the SEPA checklist:

Bulleted list, last bullet, on page 5 under Upland Cleanup Action, re-word mid-bullet to read "impacts from climate change, sea level rise and the predicted Cascadia earthquake event(s)with subsequent tsunamis with".

Actual Checklist, Section B.3.5, Does the proposal lie within a 100-year floodplain? Would recommend expansion of this question to also include "within a 500-year floodplain" due to the greater likelihood of this severe event given our current climate change scenarios. Also, your initial answer says "see attached map" but there is no attached floodplain map. Please attach a map or two as needed to show the different floodplains.

Additionally, if for some reason DOE moves forward with alternative SL-3, which leaves the majority of the contaminated soils and sediments on site, then DOE must prepare an Environmental Impact Statement (EIS) that includes a public review and comment cycle.

Comments on the Interim Action Plan:

Unfortunately, neither the 2021 Interim Action Report, Volume III, or this current Interim Action Plan, were prepared (and remedial alternatives evaluated) considering what is stated in the last bullet of the SEPA checklist, "impacts from climate change, sea level rise and the predicted Cascadia earthquake event(s) with subsequent tsunamis! This leads us to believe that virtually all remedial alternatives evaluated and scored are potentially incorrect since we do not know what would happen to the 10 acre capped area when one or multiple of these events takes place. Contaminants could be spread and exposure pathways completed. For example, would a 100-year or 500-year flood of Ennis Creek destroy the integrity of only the eastern portion of the capped area or the entire capped area? Not knowing answers to these type of questions leads us to believe that the only "permanent" remedial option for the site is complete removal of contaminants, or SL-5 and S-5.

Section 3.1, Site Geology and Hydrogeology, for the "flat" portion of the Upland Study Area provide the general height of that area compared to mean sea level (MSL). This is important data to have when evaluating the effect of King-tides combined with storm surge or tsunamis would have on the site and capped area.

Comment on Sections 6 and 7: We recommend that all future sample analyses for soil and sediment include include the addition of polyfluoroalkyl substances (PFAS) to the target analyte list.

Comments on Next Steps in Section 7:

Since by your own admission the remedial alternatives for soil and sediment at this site have not been evaluated in the context climate change, sea level rise and Cascadia events, this section requires a narrative description of how and when DOE will orchestrate integration of these events and the findings identified. There needs to be a discussion of how and when the remedial alternatives will be re-scored for the MTCA criteria, and potentially re-ranked based on any revisions to the disproportionate cost analysis (DCA).

For example, what if this site and areas of heavy fill are identified as being in a liquefaction zone which could cause portions or all of the site to "sink" during a Cascadia event thereby breaking down the capped area re-releasing contaminated soils and sediments back into the environment. This would certainly seem to initiate a re-evaluation of the scoring to the protectiveness, permanence, long-term effectiveness, and consideration of public concerns criteria.

Because of the complexity of this site located along the coast and potentially highly effected by climate change events and earthquake events (including tsunamis), future remedial design work including hydrodynamic modeling and the drafting of a pre-remedial design Work Plan must allow for a public review and comment cycle. We believe that the public needs this type of informational detail to better understand the effects these types of catastrophic events will have on the site especially for contaminated media consolidated and left on site!

Thank you in advance for your consideration of our comments, concerns, and questions.

Bob Sextro
Board Member
North Olympic Group of the Washington State Chapter of the Sierra Club

Sharpe, Rosie

Date: 8/11/25
Method: Email
Comment: See below.

Please remove all toxic remnants at the Rayonier Mill site in Port Angeles. 100% clean up please!

Rosie Sharpe
1603 S. Golf Course Rd
Port Angeles, WA

Sheedy, Joy

Date: 8/11/25
Method: Website
Comment: See below.

Subject: Please Choose Alternative SL5 for a Permanent Cleanup of the Rayonier Mill Site

Marian Abbett, Site Manager Washington Department of Ecology PO Box 47775 Olympia, WA 98504-7775

I am writing as a concerned citizen and a member of the Port Angeles community to express my strong support for Alternative SL5 for the cleanup of the former Rayonier mill site. This is a critical issue for the long-term health of our community and the unique marine habitat of our waterfront.

The Port Angeles waterfront is a vital resource and a home to critical species, including our endangered Southern Resident killer whales, salmon, and migratory birds. The contamination at the mill site, including PCBs, dioxin, and heavy metals, poses a significant and ongoing threat to this sensitive ecosystem.

Alternative SL3, which involves simply capping the site, is not a permanent solution. This temporary fix ignores the very real risks of sea-level rise, coastal erosion, earthquakes, and floods that could breach the cap and re-release pollutants into our waters.

A complete and permanent cleanup is long overdue. I urge you to select Alternative SL5, which involves the full removal of all contaminated soil. This is the only lasting solution that will truly protect our community and our environment for generations to come.

I believe the benefits of SL5 are vastly understated, and the costs of SL3 are not accurately estimated. The long-term health of our community is a benefit that cannot be measured in simple terms.

The people of Washington state deserve a thorough clean-up of this past industrial site…please make sure this happens!

Please, for the sake of our community and our environment, choose Alternative SL5.

Sincerely,

Joy Sheedy

Sherman, Jim

Date: 7/25/25
Method: Email
Comment: See below.

From: Jim Sherman jimsherman1945@gmail.com
Sent: Friday, July 25, 2025 8:57 PM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Subject: public comment

Please consider the attached comments regarding the Rayonier toxic waste site in Port Angeles.

Attachment:
To: Washington Dept. of Ecology
Re: Rayonier @ Port Angeles

I write to give my comments regarding the clean-up (or lack thereof) of toxic waste at the Rayonier property in Port Angeles. I was appalled to learn that 28 years of non-action has slipped by with the issue still unresolved. For 28 years the Rayonier company has used attorneys and lobbyist to postpone spending money and has relied on changes in government and bureaucratic loss of focus. The company started in WA with saw mills on the Olympic Peninsula. This is not the only property that Rayonier has polluted and walked away from in the PNW. During this same time period the list below shows business dealing that have taken place:

1952: Started giving charitable gifts to civic and educational organizations.

1994: 969,000 acres purchased in the southeast US.

2006: 228,000 acres purchased

2008: 56,000 acres purchased for $215 million

2013: Sold mill for $80 million. Bought shares in Matariki Forestry Group for $140 million

2016: Purchased 61,000 acres in Ore for $263 million and 55,000 acres in WA for $130 million.

2022: Started a 26,000 acres development in Wildlight, Florida. Bought Pope Resources in the PNW.

2025: Intending to sell a New Zealand properties for $710 million.

It should be obvious to anyone that this company has the resources necessary to finance the clean-up required in Port Angeles and the difference between proposal (3) and (5), although no small sum, would not put a significant dent in Rainier's profits. This is a publicly traded company which has the intent to provide the largest possible return on investment for the shareholders, without regard for the community in which it has done business or the ecology of the area it has disrupted.

I would also draw your attention to the estimates for the proposed two clean-up methods. I understand that these costs are based on a percentage that have been used on other jobs. I would argue that the cost of solution (5) would be much less than the amount that has been estimated based on the fact that solution (5) is much simpler in its planning and engineering than proposal (3). I also do not believe that enough money has been included in the long term (forever) maintenance and monitoring that proposal (3) would require to ensuring ongoing safety.

After reviewing proposal (3) I was interested in why the 10-acre toxic waste dump site covered by 2 feet of clean earth needed to be fenced. Could that mean that humans would still not be safe around that site? The point I wish to make is that proposal (3) is really not a permeant and final solution to this toxic waste site. The waste is still there. 10 acres of the property could not be used. It would have to be monitored by a company that does not really care about the problem. Additionally, possible future natural disasters would force a second clean-up effort. Who would pay for that clean-up?

I would prefer that the Dept. of Ecology choose the permanent solution which is proposal (5), the so-called dig and dump plan. It is time for your department to live up to your mandate to protect the people and environment of the state of Washington. It has been 28 years of "kick the can down the road", so now is your (a new generation of ecologist) chance stand up against those who pollute.

Thanks for reading this and your consideration.

Jim Sherman, 5153 Blue Mountain Road, Port Angeles, WA. 98362
jimsherman1945@gmail.com

Shreffler, Dave

Date: 7/31/25
Method: Website
Comment: See below and the following 19 pages.

As a retired restoration ecologist, I am writing to urge Ecology to hold Rayonier responsible for complete cleanup of the Rayonier Mill site. In my professional opinion, partial cleanup and capping of contaminated sediments are not scientifically justified and will not adequately protect human health or ecosystem health.

Decades of post-remediation monitoring at five large scale sediment remediation projects in Puget Sound (Bellingham Bay, St. Paul Waterway, Eagle Harbor, Hylebos Waterway, and Sinclair Inlet) revealed mixed effectiveness at reducing risks to human and ecosystem health (Patmont and Healy 2024).
https://onlinelibrary.wiley.com/doi/full/10.1002/ieam.4890

In addition, I believe Ecology is remiss in not demanding restoration of Ennis Creek in addition to the marine nearshore. Restoration of Ennis Creek and estuary is essential if there is any hope of ever recovering the ESA-listed fish species that currently use or historically used Ennis Creek. In 2009 and 2010, representatives from the Lower Elwha Klallam Tribe, Rayonier, the City of PA, and multiple other stakeholder groups spent six months developing a science-based conceptual plan for the restoration of Ennis Creek and estuary, which I have attached for your consideration. I was the facilitator of the Ennis Technical Team and the lead author of the plan.

Finally, MTCA's main purpose is “to raise sufficient funds to clean up all hazardous waste sites and to prevent the creation of future hazards due to improper disposal of toxic wastes into the state's lands and waters.” (RCW 70A.305.010). Can Ecology say with certainty that it is fulfilling it's legal obligation to prevent the creation of future hazards by capping contaminated sediments at the Rayonier Mill Site?

May 18, 2010

Frances G. Charles
Chairwoman
Lower Elwha Klallam Tribe
2851 Lower Elwha Road
Port Angeles, WA 98363

Carla Yetter
Director, Environmental Affairs
Rayonier Properties LLC
50 North Laura Street, Suite 1900
Jacksonville, FL 32202

Rayonier
Value From The Ground Up

Dear Mesdames Charles and Yetter:

Enclosed are ten (10) copies of the Ennis Creek Restoration Conceptual Plan prepared by the Ennis Technical Team ("ETT"). This conceptual plan was developed pursuant to a provision of the Cooperative Agreement between the Lower Elwha Klallam Tribe and Rayonier Properties' predecessor in interest, Rayonier Inc., dated June 21, 1999 (the "Agreement"), which stated in relevant part:

> The Company agrees to provide at its expense . . . . a conceptual plan for the restoration of Ennis Creek where it crosses the Company's property.

In developing the attached document, the ETT expanded the scope of the planning effort beyond just the boundaries of Ennis Creek on the Company's property which was above and beyond the scope of the Agreement. Restoration planning areas A through H, as shown on Figure 2 of the attached document, constitute the conceptual plan identified in the Agreement. In addition to the conceptual plan, the ETT identified suggested improvements to the estuary in planning areas I through M, some of which are located on property not owned by Rayonier. If these were implemented by present or future owners of the property, it would augment the functioning of the estuary and stream as a whole and provide additional benefits above and beyond the restoration of Ennis Creek.

The ETT recognizes that the material contained in the attached report relating to restoration planning areas A through H constitutes a conceptual plan only. Final restoration plans for Ennis Creek, if designed and implemented, may vary from this conceptual plan based on other activities and future land uses at the site.

Very truly yours,

Mike McHenry
Lower Elwha Klallam Tribe Lead

Warren Snyder
Rayonier Properties Lead

Enclosure
cc: Sonya Tetnowski, CEO (w/encl.)
Lower Elwha Klallam Tribe

Ennis Creek & Estuary Restoration Conceptual Plan:
A Synopsis of the Ennis Technical Team's Planning Efforts

1.0 The Purpose of this Report

The purpose of this report is to succinctly summarize the Ennis Technical Team's (ETT) science-based conceptual plan for restoring Ennis Creek and Estuary on property owned by Rayonier, Inc (Rayonier). The former Rayonier Mill Site is located on approximately 80 acres of land at the northern end of Ennis Creek. The site is bounded to the north by the Strait of Juan de Fuca, to the south by the Port Angeles Wastewater Treatment Facility, and to the east and west by bluffs with residential areas on top. Ennis Creek runs directly through the former mill site (Figure 1).

2.0 The Ennis Technical Team (ETT)

The Ennis Technical Team (ETT) was formed in response to a legal agreement between Rayonier and the Lower Elwha Klallam Tribe (LEKT) specifying that Rayonier agreed to provide at its expense: *(1) a survey of the elevations and location of Ennis Creek where the Creek crosses the Company's property* (See Figure 1), *and (2) a conceptual plan for the restoration of Ennis Creek where it crosses the Company's property.* Although not part of the legal agreement, there was also an understanding between Rayonier and LEKT that Ennis Creek and the estuary are functionally linked, and in order to restore the creek it will also be necessary to restore at least portions of the estuary.

The ETT was convened under the joint leadership of Warren Snyder of Rayonier and Mike McHenry of LEKT in November 2009. Shreffler Environmental was hired by Rayonier to facilitate the development of the conceptual plan between November 2009 and March 2010.

The invited participants on the ETT were:

Bill White	Lower Elwha Klallam Tribe
Byron Rot	Jamestown S'Klallam Tribe
Dave Shreffler	Shreffler Environmental (facilitator)
Joel Breems	Washington Department of Natural Resources
Julie Dieu	Rayonier
Kathryn Neal	City of Port Angeles
Larry Dunn	Lower Elwha Klallam Tribe
Matt Beirne	Lower Elwha Klallam Tribe
Michael Blanton	Washington Department of Fish and Wildlife
Mike McHenry	Lower Elwha Klallam Tribe (co-lead with Warren Snyder)
Randall McCoy	Lower Elwha Klallam Tribe
Warren Snyder	Rayonier (co-lead with Mike McHenry)



Figure 1. Boundaries of the Rayonier Mill Site.

3.0 Ennis Watershed Background

The reader already familiar with the Ennis Watershed may wish to skip directly to Section 7.0 (The Conceptual Plan for Restoring Ennis Creek and Estuary).

The following background information for Ennis Creek (WRIA #18-0234) has been extracted from the WRIA 18 Watershed Plan with some editing, modifications, and updates (http://www.clallam.net/environment/html/wria_18_watershed_plan.htm). The emphasis of the below summary is on Ennis Creek where it crosses the Rayonier property, although some upper watershed information is also provided for context.

Geography

Ennis Creek is a significant watershed draining directly to the Strait of Juan de Fuca at the eastern end of Port Angeles Harbor (Haring 1999). With a length of 8.65 miles, it is the smallest snow-fed stream on the Olympic Peninsula, draining approximately 10.5 square miles (Walton 1983; Haring 1999; Port Angeles Stormwater Management Plan 1996).

Ennis Creek is generally steep and is confined within much of its length by valley side slopes (Haring 1999). Both Ennis Creek and White Creek, its major tributary, pass through forested parcels, agricultural and pasture lands, commercial, and residential communities (Economic and Engineering Services, Inc. 1996). The 4.35-mile long White Creek, which enters Ennis Creek at RM 0.3, is heavily degraded from urbanization and has little salmon production potential due to impassable culverts (Haring 1999).

The floodplain immediately downstream from the confluence of White and Ennis creeks is channelized and fully constrained by dikes, armored banks, the Rayonier Mill parking lot, and several bridges associated with the mill (Haring 1999). The mill was dismantled by 2001 and rehabilitation of the site is ongoing. Future use of the reclaimed site, especially the use of the floodplain area, will have a major effect on the long-term health of the watershed and on the prospects for successful habitat and fisheries restoration.

Fluvial Geomorphology

LWD presence is generally poor below RM 3.0 of Ennis Creek, as most of the existing riparian forest has been logged at least once. In this reach, Ennis Creek is confined within a steep wooded ravine (Economic and Engineering Services, Inc. 1996). The section between RM 0.3 and HWY 101 (RM 1.0) is dominated by long riffle sections intermixed with small lateral scour and debris pools associated with large organic debris (LOD) and other debris, such as tires and auto parts (Economic and Engineering Services, Inc. 1996).

In many areas, the low-flow channel is well incised within a narrow floodplain that exposes bedrock and other parent materials (Economic and Engineering Services, Inc. 1996). The low flow channel appears to be downcutting and vertical streambanks are common, with some measuring three to four feet. The loss of instream wood and the altered riparian composition are likely the causes of this downcutting. The substrate is dominated by small gravels and sand/silt, with riffle areas composed largely of boulders, cobbles, or larger gravels (Economic and Engineering Services, Inc. 1996).

Several landslides occurred between RM 3.0 and HWY 101 and appear to be a dominant source of sediment inputs into the creek. These slides are associated with channel scour from increased

velocity of water delivery to the channel due to vegetation removal along the slope and stormwater discharge points at the top of the slope (Economic and Engineering Services, Inc. 1996).

The lower reaches of Ennis Creek through the Rayonier property lie on alluvium deposits such as sand, silt, and gravel on valley floors of main valleys and on beaches.

Hydrology

Ennis Creek is the smallest snow-fed stream on the Olympic Peninsula (Haring 1999). The predominant peak flow occurs during the winter rains. Summer base flows are maintained by snow runoff and groundwater discharge into the upper reaches. Peak flow concerns are associated with stormwater runoff from Highway 101 and other urban development (Haring 1999).

Flow data from the Ecology gage near the mouth of Ennis Creek (RM 0.3) is available for September 2002 to present at https://fortress.wa.gov/ecy/wrx/wrx/flows/station.asp?sta=18M060. For the 2009 water year, the annual mean flow was 12.3 cfs, the minimum daily mean flow was 3.1 cfs, and the maximum daily mean flow was 86.5 cfs.

Precipitation

The climate varies greatly throughout the watershed, depending largely on changes in elevation. Snow is the dominant form of precipitation in the higher areas of the Olympic Mountains, wherever the glaciers remain. In the lower elevations, the majority of precipitation occurs in the form of rain. Temperature variations are also influenced greatly by elevation. Perry (2001) reports average annual precipitation over the watershed in a range of 25-45 inches. The mean annual temperature is approximately 49.4° F. Minimum and maximum temperature differences range from approximately 11° F for most of the year to about 71° F in summer.

4.0 Ennis Creek Ecosystem Modifications, Functions, and Condition

The following information for Ennis Creek (WRIA #18-0234) has been extracted from the WRIA 18 Watershed Plan with some editing, modifications, and updates (**http://www.clallam.net/environment/html/wria_18_watershed_plan.htm**).

Channel

Channelization, development, culverting, and agricultural pressures have altered the Ennis Creek channel. The hydrological simplification from these practices has resulted in reduced habitat complexity. Pool habitat has been degraded from lack of large woody debris (LWD). Suitable spawning gravel is minimal due to the inundation of fine silts from landslides, downcutting, and lack of large wood.

Floodplain

The Ennis Creek floodplain downstream of White Creek is channelized and fully constrained by dikes, armored banks, the Rayonier Mill parking lot, and several bridges associated with the mill. It is constrained to the east by the Port Angeles wastewater treatment facility. Constriction of the channel and floodplain results in greater channel scour during flow events, as well as the elimination of escape cover for fish outside the active channel (EEC 1996).

Constrictions and Confinements

Constrictions include some development upstream of the Highway 101 culvert, the Highway 101 culverts, the White Creek culvert, the Ennis Creek Road culvert, the Rayonier Mill parking lot, Port Angeles wastewater treatment plant, and various bridges and pipeline crossings on the Rayonier property (Haring 1999).

Log Jam and Large Woody Debris Removal

Historically, log jams and LWD were abundant within the Ennis Creek Watershed. The reach of Ennis Creek that lies within the protection of Olympic National Park retains a high density of LWD and logjams. Below that area, the frequency of LWD and log jams decreases. LWD presence is generally poor below RM 3.0, because most of the existing riparian forest has been logged at least once. As instream wood is lost, the channel tends to downcut and eliminate gravels for spawning, isolating floodplains and off-channel habitat, resulting in a loss of pools which simplifies the system (McHenry personal communication 2002).

Substrate

Gravel is limited within the channel and deposits are confined primarily to lower reaches (Haring 1999). The channel upstream from RM 3.0 converts from gravel to cobble- and bedrock-dominated channel bed (Haring 1999). The City of Port Angeles (1996) provides details on substrate for most of the stream reaches.

Soil Erosion and Sediment Load

The combination of steep ravines and soil types of Ennis Creek leads to high erosion potential (Clallam County Critical Areas Code 2001).

Stormwater

Stormwater is a substantial concern in the Ennis and White Creek watersheds. Although there is a large area of the combined watershed that connects to the wastewater main along Front Street, much of the stormwater created in the developed areas is funneled directly to White Creek or Ennis Creek through culverts or stormwater outfalls (City of Port Angeles Mapping Data 2002). There are five direct stormwater outfalls to White Creek, seven on the lower portions of Ennis Creek, and one below the confluence of White and Ennis creeks. Polluted runoff from Highway 101 remains one of the largest stormwater concerns.

Runoff from impervious surfaces has increased with development in the watershed, and much of the existing development was constructed largely without stormwater detention and treatment facilities. Stormwater impacts resulting from altered hydrology in Ennis Creek likely include greater frequency and magnitude of peak storm flows, increased sedimentation, and rapid delivery to the streams of pollutants associated with motor vehicles, golf course maintenance, and lawn care.

Water Quality

Ennis Creek was classified as "impaired" below RM 3.0 in the State of the Waters of Clallam County, 2004. White Creek was classified as "critically impaired" below RM 1.0 and "highly impaired" between RM 1.0 and 2.0. Elevated fecal coliform levels have been reported for both

Ennis Creek and White Creek. Dissolved oxygen, turbidity, pH, temperature, nitrates, and conductivity have been measured for Ennis Creek. Little water quality data has been gathered for the White Creek watershed.

The State of the Waters report listed the following particular concerns for the Ennis Creek Watershed: impaired water quality, biological conditions, and habitat; impacts from pesticides and nutrients in golf course runoff, impacts from floodplain constrictions, encroachment, and conversion; fish passage barriers; lack of sufficient LWD; stormwater impacts; and potential leachates from old landfills.

Hazardous substances released from the Rayonier Mill Site are detailed in Section 6.0.

Noxious Weeds

Streamkeepers data note the presence of herb robert, Japanese knotweed, and reed canary grass along the lower reaches of Ennis and White creeks. The weeds are non-native species that invade ecosystems and may outcompete native vegetation.

Estuary

The lower channel and estuary have been significantly altered over time. It is thought that Ennis Creek historically emerged from the bluff over an alluvial fan before discharging into Port Angeles Harbor over broad intertidal and subtidal flats. There is no evidence that Ennis Creek flow lost an open connection to marine waters, even during summer low flows. Historic photographs indicate that Ennis Creek discharged directly to the harbor over a broad intertidal flat.

Randy Johnson, formerly of the Washington Department of Fish and Wildlife (personal communication 2001), suggests that the mill site has completely consumed the natural estuary of Ennis Creek. He references historic photographs to show that estuary conditions included about eight acres of salt marsh, with thirteen acres of sand and gravel flats. These twenty-one acres of intertidal flats associated with Ennis Creek were filled and covered over by the mill. Buildings built on pilings covered areas that were not filled. On the east bank where a building was removed, a portion of the former salt marsh is now exposed but prolific with pilings. Fill material prevents stream and tidal flow from entering this area.

The Rayonier Mill also extended into the subtidal area. Seaward of the intertidal area, the mill covered about five acres of subtidal flats. Seaward of the mill itself, the industrial pier covers another five acres. The development of the mill site has limited the natural mixing of salt and fresh water from Ennis Creek, altering hydrology and habitat.

5.0 Ennis Creek Fish Species and Status

The following information for Ennis Creek (WRIA #18-0234) has been extracted from the WRIA 18 Watershed Plan with some editing, modifications, and updates (**http://www.clallam.net/environment/html/wria_18_watershed_plan.htm**).

Ennis Creek is generally considered the healthiest of the seven small Port Angeles urban streams with respect to restoration potential for fish (Haring 1999). Salmonid stocks and historic and current status in Ennis Creek are summarized below.

Chinook salmon

Chinook salmon have not been documented in Ennis Creek. Ennis may historically have had spring Chinook salmon strays from other drainages along the Strait. In particular Elwha Chinook may have been attracted to the site when the Rayonier Mill was using 40-50 cfs of Elwha water. Up until 1997, excess Elwha water was spilled from the pipeline at the mill site.

Coho salmon

Ennis Creek continues to support a population of Morse Creek coho salmon, which does not demonstrate unique temporal or biological characteristics. Spawning is known to occur in Ennis Creek (to RM 5.0). The Lower Elwha Klallam Tribe has designated this population as "chronically depressed" (i.e. flat line and showing little sign of recovery), based on adult survey information and smolt data.

Chum salmon

Fall chum salmon were known in small runs historically, but are now thought to be extirpated.

Pink salmon

Not historically or currently present in this watershed.

Steelhead

Haring (1999) reports that Ennis Creek is known locally as supporting steelhead, but steelhead are not specifically noted in SASSI. Smolt production data collected by the Lower Elwha Klallam tribe indicates the watershed is producing small numbers of outmigrants. Spawning distribution in Ennis Creek is from approximately RM 0.2 upstream to the impassable cascade at RM 5.0 (approximately 36 redds were counted in one season in 1996 by Dick Goin).

Bull trout

While Ennis Creek does not appear to currently support a population of bull trout, there is one reported capture of a bull trout at the smolt trap site in 2000 by WDFW. However, bull trout from other adjacent drainages (Elwha and Dungeness) are at very low levels. If these populations recover, it is possible that the species will utilize habitats such as Ennis Creek. The USFWS has included Ennis Creek as a migration and rearing habitat in its definition of critical habitat in the Puget Sound Bull trout recovery plan.

Cutthroat trout

Historically and currently present in this watershed. Status is unknown.

Causes of fish declines

Possible causes of the fish stock declines in Ennis Creek include logging, channelization, urbanization, stream cleaning, estuary impacts, and fish passage problems (McHenry 1996). Randy Johnson (personal communication January 2002) reported that the estuarine and nearshore habitat modifications have impacted fish populations. Fish habitat types that have been entirely lost or severely impaired include: 1) estuarine rearing habitat for coho fry from Ennis Creek; 2)

estuarine rearing habitat for juvenile Chinook and chum from nearby systems (probably Dungeness River to Elwha River); 3) estuarine foraging habitat for cutthroat and bull trout originating across the northern Olympic Peninsula; 4) healthy nearshore migration habitat for juvenile coho, Chinook, chum, pink, steelhead, cutthroat, and bull trout; and 5) spawning habitat for sand lance and surf smelt.

6.0 Ennis Watershed History & Rayonier Mill Clean-up

The following watershed history information for Ennis Creek has been extracted from the WRIA 18 Watershed Plan with some editing, modifications and updates (http://www.clallam.net/environment/html/wria_18_watershed_plan.htm).

A Klallam village site (Y'Innis) was located at the mouth of Ennis Creek (Haring 1999). It was one of the most productive villages for the Klallam people. In the late 19th Century, the first cooperative colony in Washington was constructed at its location (Haring 1999). A small mill operation was established in 1918 with a large pulp mill following in the 1930s and operating until 1997 when it was shut down (Haring 1999).

Human Influences/Major Projects

Dams
There are currently no dams present in the Ennis Creek watershed. Historically there was a water diversion structure at the confluence of White and Ennis creeks, as well as a water diversion structure at RM 3.5. Both structures have been removed.

Diversions
A total of 248 gallons per minute (gpm) and 0.81 cubic feet per second (cfs) are allocated out of Ennis Creek through surface and groundwater rights (Clallam County Planning Division et al. 1994).

Dikes
Ennis and White creeks are both confined by riprap, development constraints, and culverts, including the Highway 101 culverts on White and Ennis creeks and the culvert under Ennis Creek Road. Both channels have been confined for much of their length from the mouth of Ennis Creek to Highway 101 (Haring 1999).

Land Development

The floodplain of Ennis Creek is moderately confined by urban development (Haring 1999). The lower portion of Ennis Creek is constrained to the east by the City of Port Angeles wastewater treatment plant (Haring 1999). Development along the stream corridor has led to the management or removal of some riparian vegetation. These activities in turn may result in the destabilization of streambanks and increased streambank erosion. Mature deciduous trees have replaced the historic coniferous vegetation along parts of the stream. The deciduous riparian zone provides less and lower quality large woody debris to the stream and alters the streamside canopy. In addition, livestock access to the corridor has trampled streambanks, increased streambank erosion, and increased the likelihood of animal wastes and associated pollutants in the aquatic environment (Economic and Engineering Services, Inc. 1996).

City Culvert

The City culvert lies under East Ennis Creek Road. It is composed of two dual concrete pipes. The seven-foot diameter concrete box culverts are 50-feet long and placed at a 6.8 percent slope with a 0.5 foot drop at the outfall.

In a letter to Jim Mahlum of the City of Port Angeles Public Works, WDFW Fish Biologist Thomas Burns writes "the culverts have been a long-standing fish passage problem by occlusion at the inlet and the subsequent hydraulic drop. Fish can either be completely blocked or delayed by the culverts depending on stream flows and/or maintenance" (January 2002). Burns recommended a structure that fully spans the width of the channel to accommodate for fish passage and habitat connectivity, as well as to reduce flooding and improve ecosystem health. This would open 5.4 miles of currently inaccessible fish habitat (Burns personal communication February 2002).

Rayonier Mill Clean-up

Rayonier, Inc. owned and operated a dissolving sulfite pulp mill on a portion of the site from 1930 until early 1997 (see Figure 1), when Rayonier, Inc. closed the mill and dismantled the mill buildings. During its operation, the mill stacks, machinery used at the mill site, the mill wastewater outfalls, and the log storage pond released hazardous substances. Hazardous substances released to the environment include, but are not limited to, petroleum hydrocarbons (TPH), carcinogenic polycyclic aromatic hydrocarbons (cPAHs), polychlorinated biphenyls (PCBs), lead, dioxins/furans, and arsenic.

At the time of mill closure, based on the results of an Expanded Site Investigation by the Environmental Protection Agency, the site qualified for listing on the National Priorities List (NPL) as a Superfund site. EPA's expanded site investigation (ESI) report identified areas of marine sediment, soil, and groundwater contamination that exceed applicable state criteria for the protection of human health and the environment on the site. Hazardous substances identified during the ESI at levels above applicable state criteria include dioxins/furans, cPAHs, PCBs, and metals.

In May 2000, oversight of the site cleanup was deferred to the state under a three party Deferral Agreement involving the EPA, Department of Ecology, and the Lower Elwha Klallam Tribe. The Deferral Agreement involves a cleanup process under the state Model Toxics Control Act (MTCA). The Lower Elwha Klallam Tribe has concurrence authority on all major cleanup decisions throughout this process because cleanup activities could affect its Treaty fisheries. The Tribe also has strong ties to the site, because of the known historic village site (Y'Innis) at the mouth of Ennis Creek. As a result, the Tribe is actively involved in planning activities associated with the cleanup process.

In 1992, Ecology issued MTCA Enforcement Order DE 92TCI029 requiring Rayonier, Inc. to take interim actions at the Finishing Room. The Enforcement Order required the removal of contaminated soils, control of water run-on and run-off to the Finishing Room area, and blocking of hydraulic oil migration towards Ennis Creek. In 1993, Rayonier, Inc. conducted interim actions in the area of the Finishing Room.

In 1998, following removal of the Finishing Room building, Ecology and Rayonier, Inc. entered into Agreed Order DE 98SW-S288 whereby Rayonier, Inc. agreed to undertake additional interim actions in the area of the Finishing Room. The Agreed Order required the removal of

contaminated soil and groundwater monitoring. Rayonier, Inc. conducted these additional interim actions in the area of the Finishing Room.

In 2002, Ecology and Rayonier, Inc. entered into Agreed Order DE 02SWFAPST-4571 whereby Rayonier, Inc. agreed to undertake additional interim actions in the area of the Finishing Room, Former Fuel Oil Tank No. 2, and the Former Machine Shop. The Agreed Order required: (1) removal of contaminated soil and sediment along the west bank of Ennis Creek (in the area of the Finishing Room) and to restore the area with an inundation area; and, (2) removal of contaminated soil to a depth of six to eight feet below the ground surface in the area of the Former Fuel Oil Tank No. 2 and the Former Machine Shop. Rayonier, Inc. conducted the interim actions in the area of the Finishing Room, Former Fuel Oil Tank No. 2, and the Former Machine Shop. Rayonier, Inc. submitted the *Interim Action Report, Ennis Creek-Finishing Room, Fuel Oil Tank No. 2, Machine Shop, Former Rayonier Mill Site, Port Angeles, Washington,* prepared by Integral Consulting, Inc., Foster Wheeler Environmental Corporation, Seattle, Washington, Final — March 2003.

7.0 The Conceptual Plan for Restoring Ennis Creek and Estuary

Rayonier and the Lower Elwha Klallam Tribe (LEKT) assembled the ETT to create a science-based conceptual plan consisting of graphics and accompanying narrative depicting a potential ecological restoration scenario for Ennis Creek and Estuary.

Definition of a Conceptual Plan

One of the first tasks of the ETT was defining what was meant by a "conceptual plan." The ETT established that their conceptual plan would depict an ecological restoration scenario for Ennis Creek and Estuary that achieves all of the identified restoration goals (listed below), while allowing for one bridge crossing to accommodate the City of Port Angeles' combined sewer outfall (CSO) connection to an existing industrial tank on the east side of Ennis Creek.

In developing the conceptual plan, the ETT was asked to assess to the best of its ability:

- ecological benefit;
- acreages of different land uses;
- constraints/challenges;
- data gaps/questions; and
- contaminant concerns.

Definition of Restoration

The ETT adopted the following definition of "restoration:"

> *The return of an ecosystem to a close approximation of its condition prior to disturbance… The goal is to emulate a natural, functioning, self-regulating system that is integrated with the ecological landscape in which it occurs (National Research Council 1992)* [1].

[1] National Research Council (NRC). 1992. *Restoration of Aquatic Ecosystems.* National Academy Press. Washington, D.C.

According to the Society for Ecological Restoration, a leading professional organization for restoration practitioners, the mission of every ecological restoration project is:

> *To reestablish a functional ecosystem of a designated type that contains sufficient biodiversity to continue its maturation by natural processes and to evolve over longer time spans in response to changing environmental conditions. The two attributes of biodiversity that are most readily attained by restoration are species richness and community structure. The restoration ecologist must assure adequate species composition and species abundance to allow the development of suitable community structure and to initiate characteristic ecosystem processes. Concomitantly, the restorationist must provide physical conditions to sustain these species (Clewell et al. 2000)*[2].

Restoration Goals

To guide planning efforts, the ETT established the following restoration goals:

1. Restore habitat forming processes (e.g. hydrology; sediment transport; geomorphology);
2. Remove, to the extent possible, anthropogenic stressors to the ecosystem;
3. Remove, to the extent possible, invasive plant species;
4. Restore habitat for fish, invertebrates, birds, and wildlife.

Embedded in these goals was our understanding that natural **processes** create the **structure** of habitats, which support ecological **functions** for species and people.[3]

Restoration Planning Units

To facilitate discussions of how to achieve the identified restoration goals, the ETT decided to break the planning area (i.e., the former Rayonier Mill Site shown in Figure 1) into logical "planning units" as depicted in Figure 2.

The potential restoration actions for each planning unit are summarized in Table 1, along with corresponding ecological benefits derived from implementing these restoration actions, acreages of different land uses, constraints/challenges, data gaps/questions to be addressed later in an engineering feasibility assessment, and contaminant concerns. It is vital to note that this table of potential restoration actions should not be viewed as an a la carte menu. The science of ecological restoration necessitates an understanding of the critical linkages between different restoration actions.

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[2] Clewell, A., J. Rieger, and J. Munro. 2000. *Guidelines for Developing and Managing Ecological Restoration Projects*. Published June 24, 2000 by the Society for Ecological Restoration, Madison, Wisconsin.

[3] This principle is well established in the literature, see for example: Fresh, K., C. Simenstad, J. Brennan, M. Dethier, G. Gelfenbaum, F. Goetz, M. Logsdon, D. Myers, T. Mumford, J. Newton, H. Shipman, C. Tanner. 2004. Guidance for protection and restoration of the nearshore ecosystems of Puget Sound. Puget Sound Nearshore Partnership Report No. 2004-02. Published by WashingtonSea Grant Program, University of Washington, Seattle, Washington. Available at http://pugetsoundnearshore.org.


Ennis Creek and Estuary Restoration (Rayonier Mill Site)
N
W
E
S
Pier
L
Jetty
M
NW
Beach
K
NE Beach
J
Restoration
Planning Area
59ac.
Estuary
H
Crossings
G
Estuary
Beach
I
Parking
Lot
Reach
F
Lower
Alder
St.
E2
Ennis
Creek
B
Upper
Alder
St.
E1
White
Creek
C
Gully
D
Ennis Ck. Culvert
A
Legend
Restoration Planning Area
Restoration Planning Units
A - Ennis Ck. Culvert 0.5 ac.
B - Ennis Creek 16 ac.
C - White Creek 4.1 ac.
D - Gully 4.2 ac.
E1 - Upper Alder St. 2 ac.
E2 - Lower Alder St. 3.1 ac.
F - Parking Lot Reach 4.7 ac.
G - Crossings 0.5 ac.
H - Estuary 4.4 ac.
I - Estuary Beach 4.9 ac.
J - NE Beach 3.2 ac.
K - NW Beach 5.9 ac.
L - Pier 5.7 ac.
M - Jetty 0.2 ac.
0
255
510
1,020
Scale in Feet
Lower Elwha Klallam Tribal GIS Dept.
Map prepared by: Randall McCoy
Background: 2009 Ortho Photo (USDA NAIP)
Ennis Creek Restoration.mxd 2/24/10

Summary of the Conceptual Plan

Between November 2009 and March 2010, the Estuary Technical Team met four times and conducted two site visits while developing the conceptual plan. The ETT came to the consensus that it would focus solely on the ecological restoration of Ennis Creek and Estuary. Thus, the ETT did not take into account uncertain and unknowable potential future land uses or re-development scenarios with the exception of the known bridge crossing required for the City's combined sewer overflow (CSO) pipelines, which was already in engineering design phase at the time the ETT was formed.

The ETT also recognized that ecosystems evolve through time, even in the absence of human stressors and habitat alterations. A great deal of discussion revolved around understanding the existing dysfunctional condition of the creek and estuary, as well as analyzing the historic condition using aerial photos, maps, optical remote sensing technology (LIDAR), and quantitative data. The ETT made full use of the various areas of expertise represented around the table, including cultural resources, restoration ecology, fisheries biology, hydrology, geomorphology, engineering, water quality, and geographic information systems (GIS), as well as city, state and federal natural resources regulations. In the end, the ETT did not propose returning the Ennis ecosystem to any one particular historic condition (e.g. 1892), but rather focused on restoring ecological processes that would foster improved habitat conditions in the Creek and Estuary.[4]

Implementation of all the potential restoration actions identified in Table 1 would result in a restored Ennis Creek and Estuary as depicted in Figure 3 (waiting on graphic from Randall). This restored ecosystem addresses all of the identified restoration goals and would result in ~59 acres of restored aquatic habitat.

The overall ecological benefits of the restored ecosystem depicted in Figure 3 include improved fish passage, direct benefit to salmonid feeding/rearing/spawning, improved hydrology and sediment transport, increased abundance and diversity of native plant species, improved water quality, restored connection between Ennis Creek and its floodplain, restored channel migration zone, increased tidal prism, and improved habitat for fish/invertebrates/birds/wildlife.

The vision of the ETT is *a natural, functioning, self-regulating system that is integrated with the ecological landscape in which it occurs*, including:

- A creek with more meanders, a wider floodplain, a forested riparian corridor comprised of native plant species, more pools/log jams/spawning gravel for declining salmon, trout, and steelhead populations, one bridge crossing to accommodate the City's CSO pipelines and the Olympic Discovery Trail, and all other unneeded infrastructure (e.g., culverts, rip rap, concrete, rubble, pipelines, pilings, bridges, roads, parking lots, etc.) and human waste/garbage removed;

[4] Much of the ground south of Planning Units J and K is fill. The ETT is assuming that leaving this fill to the southern edge of Planning Units J and K will not impact shoreline physical processes. This assumption is based upon untested observations of how the site should respond to, and how it will be affected by, longshore drift. It is possible that these remaining fill areas may be vulnerable to erosion if we do not remove the entire fill south to the historic 1892 beach.

- An estuary that is functionally linked with the creek, contains native plant communities in restored marsh, dune, beach, and eelgrass habitats, supports improved nearshore sediment transport, provides more natural nearshore migration corridors for juvenile salmonids, and within which the Rayonier Pier, jetty, concrete slabs, creosote pilings and all other unneeded infrastructure is removed; and

- Improved opportunities for public shoreline access and recreation.

The ETT recognized that interim cleanup actions of chemical contaminants will be required prior to implementation of some of the proposed restoration actions, but it did not identify what specific cleanup actions are required as this was beyond the scope of this team.

Before any restoration could proceed, an engineering feasibility assessment would need to be conducted to: address the data gaps and questions identified by the ETT, calculate volumes of material to be removed, identify restoration constraints, and calculate estimated costs for each potential restoration action identified in Table 1.

Planning Unit	Problems Identified & Restoration Opportunities	Proposed Restoration Actions	Ecological Benefits[1]	Acreage	Constraints/Challenges	Data gaps/questions	Contaminant Concerns[2]
A: Ennis Creek Culvert	This City-owned culvert is a known barrier to fish passage. Restoration opportunities include either: 1) replacing the culvert with a bridge or 2) removing it completely. Either of these restoration actions would: improve stream fish passage (by opening ~5.4 miles of currently inaccessible fish habitat); provide direct benefit to salmonid feeding, rearing, spawning; improve hydrology and sediment transport; and restore habitat for fish, invertebrates, birds, and wildlife.	1. Replace culvert w/ bridge; or	A, B, C, I	0.5	Where would funding come from? Who's responsibility is this culvert: City and/or Rayonier?	What are the dimensions of the existing culvert? What span of bridge is required?	No contamination from prior on-site industrial activities suspected or confirmed.
		2. Remove culvert	A, B, C, I		Requires re-route of wastewater treatment access road	What easements & property acquisition might be required to re-route the road (keeping it entirely on the east side of Ennis Creek)?	
B: Ennis Creek; downstream end of Ennis Creek Culvert to top of/top of parking lot on west side of Ennis mainstem, also including White Creek downstream of Planning Unit C	Within this planning unit, invasive, plant species on both banks are preventing the growth of native plants. Streamkeepers has reported herb robert, Japanese knotweed, and reed canary grass are the primary problems. The ETT during a November 2009 site visit also noted extensive Himalayan blackberries growing in dense thickets that outcompete any native species. Restoration opportunities include: restoring the riparian zone by removing invasives and planting native species (especially conifers).	Restore riparian zone by removing invasives & planting native plant species (especially conifers)	D, F	16.6		What native species would be best to plant?	No contamination from prior on-site industrial activities suspected or confirmed.
	This stream reach also lacks LWD and spawning gravel. The restoration opportunity is to place engineered log jams to scour pools and create habitat complexity.	Place engineered log jams to scour pools and create habitat complexity	B, C, I		Could affect DOE gage site; need to check w/ DOE	Source of lwd? Might need to provide spawning gravel for salmon? Specs for spawning gravel are species dependant.	
	Garbage, refuse, and human waste have historically (currently, too?) been dumped into Ennis Creek. Restoration opportunities include complete removal of all this material and posting of "no-dumping" signs as potential restoration actions.	Remove all and post. "no-dumping" signs	F			How frequently does this occur?	fecal coliform from human waste in floodplain
	The configuration of the unused parking lot on the east side of Ennis Creek confines the channel and floodplain. Restoration opportunities include removing the 90-degree bend of fill out of the parking lot to ensure that the Creek has a target width of 200 to 250 ft of unobstructed floodplain.	Remove the 90 degree bend of fill out of the parking lot	C, G, H		Need to ensure this action doesn't result in increased landslide potential	Volume of material that needs to be removed?	
C: White Creek; from southern boundary of Rayonier Property to top of Planning Unit B	Really wet riparian soils in this planning unit may preclude survival of conifers, the preferred species to have within the riparian corridor. Water parsley, an indigenous indicator not just of wetland soils but specifically of perennially wet soils, suggests that restoring this part of the riparian corridor may be problematic. Restoration opportunities include: removing invasives (if present) and planting native plant species to restore the riparian corridor to the extent possible.	Remove invasives (if present) & plant native plant species; restore riparian zone to extent possible	D, F	4.1	Unclear what native species will work in these perennially wet soils; conifers may not grow on all of these soils, but should still be planted on side slopes where water parsley is not present.	What native species would be best to plant?	No contamination from prior on-site industrial activities suspected or confirmed.
	This stream reach also lacks LWD and spawning gravel. Sediment supply to this reach has been interrupted by the culverts upstream. At the culvert inlet, sediment are periodically dredged and hauled away by the City. Restoration opportunities include: placing engineered log jams to scour pools and create habitat complexity, as well as placing spawning gravel in the stream bed and/or below th White Creek culvert outlet to be redistributed downstream through natural processes.	Place engineered log jams to scour pools and create habitat complexity	B, C, I			Source of lwd? Might need to provide spawning gravel for salmon? Specs for spawning gravel are species dependant.	
	Garbage, refuse, and human waste have historically (currently, too?) been dumped into White Creek. Restoration opportunities include complete removal of all this material and posting of "no-dumping" signs as potential restoration actions.	Remove all and post. "no-dumping" signs	F			Need to post no dumping signs?	fecal coliform from upstream septic drain fields & human waste in floodplain
D: Gully	No problems identified.	Protect this intact habitat.	O	4.2			No contamination from prior on-site industrial activities suspected or confirmed.
E1: Upper Alder St (former Rayonier Truck Route)	The ETT is concerned about the moderate to high potential for failure of this road and a landslide event(s) that would contribute unwanted sediment to the stream. Because this road is no longer needed by either the City or Rayonier, restoration opportunities include: completely removing the road and planting native vegetation to stabilize slopes and restore the riparian corridor.	Remove road completely and plant native vegetation to stabilize slopes and restore riparian corridor	C, D, E, G, H	2.0	Archeologist may need to be present during any digging	Stability of existing hill slope? How should road removal be done to decrease the potential for landslides?	No contamination from prior on-site industrial activities suspected or confirmed.
E2: Lower Alder St (former Rayonier Truck Route)	The lower portion of this road (south of the existing parking lot on the west side of Ennis Creek) confines Ennis Creek and prevents access to its former floodplain. Because this road is no longer needed by either the City or Rayonier, restoration opportunities include: completely removing the road and planting native vegetation to stabilize slopes and restore the riparian corridor.	Remove road completely and plant native vegetation to stabilize slopes and restore riparian corridor	C, D, E, G, H	3.1	Archeologist may need to be present during any digging	Likelihood of cultural resources under road bed?	No contamination from prior on-site industrial activities suspected or confirmed.

Planning Unit	Problems Identified & Restoration Opportunities	Proposed Restoration Actions	Ecological Benefits[1]	Acreage	Constraints/Challenges	Data gaps/questions	Contaminant Concerns[2]
F. Parking Lot Reach	This stream reach is severely confined and rip-rapped on both banks the entire length of the planning unit. Restoration opportunities include: removing all rip-rap and one to two vertical feet of fill at the edge of existing creek channel. The restoration actions will allow natural processes to gradually carve a new floodplain and channel meanders.	Remove all rip-rap & 1-2 vertical feet of fill at edge of existing creek channel and allow mother nature to gradually carve a new floodplain and channel meanders through natural processes	B, C, G, H, I, J	4.7	Significant concerns about cultural resources that could be unearthed beneath the existing parking lot; archeologist must be present during any digging	Where would rock & fill material be disposed? There's lots of excess rock in the project area; could it be used in the channel in a beneficial way to create habitat?	No contamination from prior on-site industrial activities suspected or confirmed.
	Within this planning unit, invasive plant species on both banks may be preventing the growth of native plants. Restoration opportunities include: removing invasives (where present) and planting native plant species to restore the riparian corridor to the extent possible.	Remove invasives (if present) & plant native plant species; restore riparian zone to extent possible	D, E			What native species would be best to plant?	
	This stream reach also lacks LWD and spawning gravel. The restoration opportunity is to place engineered log jams to scour pools and create habitat complexity.	Place engineered log jams to scour pools and create habitat complexity	B, C, J			Source of lwd? Might need to provide spawning gravel for salmon? Specs for spawning gravel are species dependant.	
	The current Olympic Discovery Trail (ODT) crossing confines Ennis Creek and prevents access to its former floodplain. Restoration opportunities include: removing the existing ODT Bridge and re-routing trail traffic to the new City Bridge that will be constructed downstream.	Remove ODT bridge and re-route trail traffic to new City bridge downstream	G, H		Would need to leave existing ODT crossing in place until new City bridge is done	Could bridge be saved intact & used at another ODT stream crossing?	
G: Crossings Reach; downstream end of parking lot reach (E) to upstream limit of tidal influence	Multiple stream crossings (i.e., bridges, pipelines, catwalks) confine Ennis Creek and prevent access to its former floodplain. Restoration opportunities include: removing all crossings within Unit F except the new bridge the City is constructing, which would carry all City pipelines and also be the new ODT crossing; the crossings (from S to N) are: traffic bridge, railroad bridge, sanitary sewer force mains, traffic bridge, utility catwalk).	Remove all crossings within Unit F except the bridge required for the City CSO project. The Ennis Technical Team recommended to the City a 100-ft long, 15-ft wide bridge that would carry the City's 3 pipelines underneath and the Olympic Discovery Trail on top, as depicted in Alternative 2C by the City's contracted engineering firm Berger ABAM. The existing traffic bridge must stary in place until the new City CSO bridge is constructed. Once the City CSO bridge is in place the traffic bridge must be removed.	F, G, H	0.5	This proposed action would eliminate the existing traffic bridge, which currently allows west to east access across Ennis Creek. Any future bridge crossing would need to occur within the existing railroad bridge corridor and be 100-ft minimum span in order to accommodate the restoration of the Creek. Any future bridge crossings must keep pilings and infrastructure out of the Ennis Creek channel. The City's concrete pipeline that is currently in the bed of the creek is acting as a grade control; as soon as the City's new CSO Bridge is constructed, the pipeline will no longer be needed and must be removed.	Are any of these existing structures creosote? Need to do an inventory. What road improvements are needed on east side of Creek if the traffic bridge is removed?	Creosote in pilings and cross-beams of some structures. No other contamination from prior on-site industrial activities suspected or confirmed.
	This reach is severely confined & rip-rapped on both banks the entire length of th planning unit. Restoration opportunities include: removing all rip-rap on both banks and re-meandering the stream channel.	Remove all rip-rap and re-meander the stream channel	B, C, G, H, I, J		Archeologist must be present during any digging	Where would rock & fill material be disposed? There's lots of excess rock in the project area; could it be used in the channel in a beneficial way to create habitat? Design of channel meanders: how many, where?	
	Within this planning unit, invasive plant species are preventing the growth of native plants. Restoration opportunities include: removing invasives (where present) and planting native plant species to restore the riparian corridor to the extent possible.	Remove invasives & plant native plant species; restore riparian zone	D, E			What native species would be best to plant?	
	This stream reach also lacks LWD and spawning gravel. Restoration opportunitie include: placing engineered log jams to scour pools and create habitat complexity, as well as placing spawning gravel in the stream bed.	Place engineered log jams to scour pools and create habitat complexity; place spawning gravel	B, C, J			Source of lwd? Might need to provide spawning gravel for salmon? Specs for spawning gravel are species dependant.	
H: Estuary; upstream limit of tidal influence to mouth of Ennis Creek	This reach is severely confined and rip-rapped on both banks the entire length of the planning unit. Mill rubble is acting like a dike that prevents the creek from accessing the former floodplain. Restoration opportunities include: removing all rip-rap, mill rubble, and fill, and allowing the stream channel to naturally meander.	Remove all rip-rap, mill rubble, fill, and allow the stream channel to naturally meander	B, C, G, H, I, J, N	4.4	Archeologist may need to be present during any digging	Where would rock & fill material be disposed? There's lots of excess rock in the project area; could it be used in the channel in a beneficial way to create habitat?	Metals and PAHs detected above screening levels in a few soil sample locations. Dioxins & PCBs detected above screening level in one soil sample.
	This reach also has remnant (and no longer needed) infrastructure from the Rayonier Mill, including concrete slabs, building foundations, pilings, and an unneeded creek crossing near the mouth of Ennis Creek. Restoration opportunities include: removing all pilings (~600), foundations, concrete slabs, and creek crossings.	Remove all pilings (~600), foundations, concrete slabs, and creek crossings	B, C, F, G, H, I, J, N		Archeologist may need to be present during any digging. Need to investigat whether the creosote pilings visible above ground in the former salt marsh are on concrete footings (i.e. remnant block & pier foundation) or whether they were driven deep and are creosoted their entire length.	Where would rock/concrete/pilings be disposed? There's lots of excess rock in the project area; could it be used in the channel in a beneficial way to create habitat? Are some (all?) of the estimated 600 pilings creosote?	Creosote in pilings and cross-beams of some structures. TPH detected above screening levels in soil samples near bridge at mouth of Ennis Creek.
	Within this planning unit, invasive plant species are preventing the growth of native plants. Restoration opportunities include: removing invasives (where present) and allowing native estuarine plant species to naturally colonize the former salt marsh in this area.	Remove invasives & plant native plant species and/or allov natural recolonization of estuarine plant species	D, E			What native species would be best to plant?	
	This stream reach also lacks LWD and spawning gravel. The restoration opportunity is to place engineered log jams to scour pools and create habitat complexity.	Place engineered log jams to scour pools and create habitat complexity	B, C, J			Source of lwd? Might need to provide spawning gravel for salmon? Specs for spawning gravel are species dependant.	

Planning Unit	Problems identified & Restoration Opportunities	Proposed Restoration Actions	Ecological Benefits[1]	Acreage	Constraints/Challenges	Data gaps/questions	Contaminant Concerns[2]
I. Estuary Beach; east of Ennis Mouth to eastern boundary of Rayonier Property	This shoreline planning unit has riprap, a berm, and remnant (no longer needed) infrastructure from the Rayonier Mill. Restoration opportunities include: removing all rip-rap, the berm, and mill infrastructure.	Remove all rip-rap, the berm, and remnant infrastructure	B, C, J, K, M	4.9	Restoration actions must not disturb the City Outfall; Archeologist may need to be present during any digging	Need to inventory what remnant infrastructure exists within this unit. Is this potential forage fish spawning habitat?	Dioxin/furan detected in only one soil sample location above standards.
	Invasive plant species along the shoreline are preventing the growth of native plants. Restoration opportunities include: removing the invasive species and restoring the native plant community either by planting native species or allowing natural recolonization.	Remove invasives and allow natural recolonization of estuarine plant species and the beach dune community; if natural recolonization does not happen, planting native plants and controlling exotics may be necessary.	D, E			Natural recolonization or replant? Was there ever coastal forest at this location, between the toe of the bluff and the dune?	
J. NE Beach; west of Ennis Mouth to Rayonier Pier	Along the shoreline of this planning unit there is a remnant concrete slab on pilings built over formerly functional beach/intertidal habitat. Restoration opportunities include: removing the fill, riprap, timber seawall, pilings, concrete slab, and all other infrastructure to beach/intertidal elevations.	Remove fill, rip-rap, timber seawall, pilings, concrete slab and all other infrastructure to beach/intertidal elevations	B, C, F, J, K, M, N	3.2	Archeologist may need to be present during any digging	Need to inventory what remnant infrastructure exists within this unit; How many of the pilings are creosote? Is this potential forage fish spawning habitat? Where did the limestone on the beach come from (there is no known limestone quarry on the Peninsula)?	Creosote in pilings. Potential for dioxin/furan, metals and cPAH in soils.
K. NW Beach; Rayonier Pier to Jetty, including shoreline along former log bay	This planning unit has rip-rap and remnant (no longer needed) infrastructure from the Rayonier Mill built over formerly functional beach/intertidal habitat. Restoration opportunities include: removing the fill, riprap, timber seawall, and all other infrastructure to beach/intertidal elevations.	Remove fill, rip-rap, timber seawall, and all other infrastructure to beach/intertidal elevations	B, C, F, J, K, M, N	5.9	Archeologist may need to be present during any digging	Need to inventory what remnant infrastructure exists within this unit; How many of the pilings are creosote? Is this potential forage fish spawning habitat?	Creosote in pilings. Potential for dioxin/furan, metals and cPAH in soils.
L. Rayonier Pier	The pier interrupts nearshore sediment transport and disrupts natural alongshore fish migration. Restoration opportunities include: complete removal of the pier and all associated infrastructure.	Complete removal of pier (~10,000 pilings) and all associated concrete, pipes, and infrastructure.	F, J, K, L, M, N	5.7	Public perception that this pier is useable in its current state. Removal cost will be the driver.	Exact number of pilings to be removed? Is this potential forage fish spawning habitat? Where did the limestone on the beach under the pier come from (there is no known limestone quarry on the Peninsula)?	Creosote in pilings. Dioxins, PCBs in sediments.
M. Jetty	The driven piling/rock crib jetty to the west of the Rayonier Pier was constructed to protect the log bay, but is no longer needed. The jetty interrupts nearshore sediment transport and disrupts natural alongshore fish migration. The restoration opportunity is complete removal of the jetty.	Complete removal of jetty; large logs trapped at base of jetty should be used in other areas of the restored site and/or stockpiled for use in nearby restoration projects.	J, K, L, M	0.2	Interim cleanup of the log bay must happen before jetty is removed.	Volume of rock to be removed? Does this rock have monetary value?	Creosote in pilings. Dioxins, PCBs in sediments.

[1] **Ecological Benefits Codes:**

A. Improves stream fish passage.
B. Provides direct benefit to salmonid feeding, rearing, and spawning.
C. Improves hydrology and sediment transport.
D. Removes non-native/invasive plant species.
E. Increases diversity and abundance of native vegetation.
F. Improves water quality.
G. Restores/partially restores historic connection between Ennis Creek and the floodplain.
H. Restores/partially restores channel migration zone.
I. Increases tidal prism.
J. Restores habitat for fish, invertebrates, birds, and wildlife
K. Restores more natural drift cell.
L. Removes shading of submerged vegetation (e.g. eelgrass
M. Restores more natural shoreline migration route for fish
N. Removes contaminated soil/sediment
O. Protects intact habitat

[2] **Contaminant Concerns Notes:**

The creek and buffer were not developed in the southern part of the property, and there is only sparse sampling data in that area. In the northern portion of the site, the former Finishing Room area interim action (IA) included the removal of contamination within the area adjacent to the creek. Currently, the majority of the creek area has not been identified as having contamination, with the exception of some residual TPH contamination left after the former Finishing Room IA and creosoted wood pilings in the former roll storage warehouses adjacent to the railroad bridge. Data from the Uplands RI and EPA ESI show that surface and subsurface freshwater sediment data for Ennis Creek indicated the presence of several metals (aluminum, barium, cobalt, manganese, nickel, and vanadium; some naturally occurring) exceeding freshwater and marine sediment quality levels; however, with the exception of manganese these concentrations fell within the range of results for the EPA ESI background locations (Integral 2007). A detailed review of site contamination data will be performed prior to any on-the-ground restoration activities.

[3] **Future Potential Restoration Opportunities**

Upland areas south of Planning Units I, J, and K were identified by ETT as "future potential restoration opportunities." The ETT consensus was that these upland areas were outside the essential area necessary to restore ecological processes for Ennis Creek and Estuary, and thus they were not included as part of the Conceptual Plan. However, the ETT also recognized that from a landscape ecology perspective, connectivity of habitats is essential to ecosystem function. Thus, there would be significant benefit to restoring these upland areas south of Planning Units I, J, and K to (now rare) forested marine riparian habitat to the base of the bluff.



Figure 3. Depiction of Ennis Creek and Estuary pre-restoration (left) and post-restoration (right) (graphics by Randall McCoy).

Siebrands, Alda

Date: 8/4/25
Method: Website
Comment: See below.

There is never a successful dump contaminated material, seal, cover-up, and fence-off operation that leaves doesn't leave the public to readdress the same issue decades later. The contaminants won't be gone - just governmentally sanctioned by hiding them. Why would the state Ecology even consider forcing Port Angeles, after 28 years already of dealing with contaminants in the water and air surrounding Raineer's old mill site, to pass the buck on to more generations. Please, please take the option of requiring Raineer to remove, the contaminated materials that m ade them money for many decades. Time for them to pay their dues is now.

Smith, Stephanie

Date: 8/11/25
Method: Email
Comment: See below.

Marian Abbet,

Hello there, I am a resident of Port Angeles and would like to submit a public comment regarding the Rayonier Pulp Mill Cleanup obligation.

I am an advocate for our fish, wildlife, soil, air and waters and insist on a full clean up of the ecologically significant and valued site, not a partial cover-up. There needs to be a complete removal of toxic sediments and soils for the long term protection of the community.

The plan for pollution clean up has taken far too long and should now be made a priority, especially given all of the data which documents the contamination.

Thank you!

Stephanie Smith

Sorensen, Alexis

Date: 8/7/25
Method: Website
Comment: See below.

Rainer parent corporation MzUST due complete clean up of their site in Port Angeles!! They have profited for decades from this site. The residents and decedents of our town should not have to clean up their pollutants and mess. They need to step up and do the right thing!! They should KNOW they should be held accountable!

Look in the mirror and and the children in this world and Do the RIGHT THING!

Be the start of a great thing.... Taking responsibility for your actions;)

Alexis Sorensen - long time resident and business person (retired now, but still living in (PA). Thank You in advance!!

Soule, Ann

Date: 8/11/25
Method: Website
Comment: See below.

Thank you for this opportunity to provide public input to the Rayonier Mill cleanup of pollution it caused over decades of operation. I have lived in Sequim since 1991 and remember when the mill closed. The big question was would the corporation be required to clean up the pollution they left behind, or not. Unfortunately, more decades have passed and we're finally asked to provide input and potentially agree to allowing them not to do so.

I am in agreement with the Port Angeles City Council, Friends of Ennis Creek, the local Surfrider chapter, and members like myself of the Clallam Marine Resources Committee: option SL-5 must be chosen.

There is no excuse not to finish the “cleanup” job with actual, permanent cleanup. I have learned that the risk from capping pollutants in the sediment under the marine shoreline is high given the storms and tsunami risk our area faces. Any failure of the cap in the future and the cost rests on taxpayers, especially local: residents and visitors, lost economic opportunity, and negative impacts on our fragile nearshore and anadromous animals, fish, and plants. I am not convinced these potential costs have been fully assessed.

I urge all parties to accept the responsibility of complete cleanup at the Rayonier site by selecting option SL-5. That plan is a good one and should be implemented as soon as

possible for the benefit of us all, and to avoid continuing the debate and cost of endless deliberation. Thank you for listening.

Sperr, Matt

Date: 8/8/25
Method: Website
Comment: See below.

SL5 is permanent and allows property reuse. I request that SL5 be the preferred and permanent solution to this long-delayed toxic cleanup. Make them clean up their mess. If this was your backyard would you want hazardous waste covered up?

Spock, Susannah

Date: 8/12/25
Method: Website
Comment: See below.

I am writing as a concerned citizen and a member of the Port Angeles community to express my strong support for Alternative SL5 for the cleanup of the former Rayonier mill site. This is a critical issue for the long-term health of our community and the unique marine habitat of our waterfront.

The Port Angeles waterfront is a vital resource and a home to critical species, including our endangered Southern Resident killer whales, salmon, and migratory birds. The contamination at the mill site, including PCBs, dioxin, and heavy metals, poses a significant and ongoing threat to this sensitive ecosystem.

Alternative SL3, which involves simply capping the site, is not a permanent solution. This temporary fix ignores the very real risks of sea-level rise, coastal erosion, earthquakes, and floods that could breach the cap and re-release pollutants into our waters.

Why should the taxpayers assume the liability of potential future leaks or other issues associated with the contamination on behalf of Rayonier? Why is a partial cleanup even being considered when this clearly is not in the best interest of the residents of Port Angeles? Please do the right thing and require the responsible party to clean up the contamination they left behind.

A complete and permanent cleanup is long overdue. I urge you to select Alternative SL5, which involves the full removal of all contaminated soil. This is the only lasting solution that will truly protect our community and our environment for generations to come.

I believe the benefits of SL5 are vastly understated, and the costs of SL3 are not accurately estimated. The long-term health of our community is a benefit that cannot be measured in simple terms.

Please, for the sake of our community and our environment, choose Alternative SL5.

Sprouse, Howard

Date: 8/10/25
Method: Website
Comment: See below.

The Remediators Incorporated along with project partners within Washington State and across the USA and Canada are recognized experts in cutting edge remediation technology that is capable of treating every aspect of the pollution within the areas effected by the mill operations from the Rayonier Mill. Attached is a document complete with references to the technology. Currently this technology is in use with the full support of the USFS, US Agricultural Research Station, many universities across the continent and public and private industry. Our technology was listed by the former head of the USDA as the most promising new technological development in decades and has been fully commercialized. It fits seamlessly within Option three of the cleanup processes identified by ECY. Further, within portions of the cleanup area this technology can be used without the need for major excavation as well as for a vegetative buffer protecting Ennis Creek habitat. Validation from members of the federal government, Battelle, and within your own agency can confirm these statements. Please see the attachment. We look forward to your positive response and dialogue with stakeholders and the property owner.

Squires, Jen

Date: 8/11/25
Method: Website
Comment: See below.

This is criminal! I fully support the permanent solution of Alternative SL-5 for contaminated soil and sediment at the former Rayonier Mill site in Port Angeles, WA. Proposed Alternative SL-3, leaving contaminated soil in place forever in a capped mound which will greatly limit future development, is unacceptable.

YOU NEED TO FIX THIS NOT COVER IT UP!

Stastny, Bret

Date: 8/9/25
Method: Website
Comment: See below.

I want a full and complete clean up and not just a surface clean up, restore the land to how it was before it was polluted.

Stedman, Peter

Date: 8/7/25
Method: Website
Comment: See below.

I have recently become aware that Rayonier is responsible for the hiring of consultants who estimate the costs of preferred solutions and is overseen by the Department of Ecology (also known as the DOE).

I believe DOE to be negligent in their oversight of costs and benefits estimates.

The DOE informed us that SL3 had to be the choice because the cost-benefit ratio was too high, and this was “the law,” an RCW over which they had no control. The fact that the estimated costs have been minimized in SL3 and exaggerated in SL5 results in a differential of $27 million, which forces SL3 to be the preferred solution by the letter of the law.

After further examination of the cost estimates of SL3, several areas are underestimated and incomplete, for instance, permitting, design and modeling, maintenance, repairs, and monitoring (to be done by Rayonier), plus coordination with sediment work and potential toxicity of untested sediments beneath the current dock as well as unknown protocols necessary for that remediation.

The benefits have been estimated too high and the costs too low for SL3.

How much will it cost when there is damage to the 10-acre capped toxic soil along the waterfront?

There's no modeling for loss of taxes, economic benefits, acts of God, along with sea level rise in these estimates.

SL-5 estimates are higher than expected. Engineering is not as complex, economy of scale, erroneous $75,000 restrictive covenant preparation cost included (which should not be there), and non-construction cost of $6.25 million higher than for SL3, which seems inaccurate as well.

For the benefit of Rayonier, future generations, and the restoration of the estuary and creek, the cleanup should be permanent.

SL5 is permanent and allows property reuse.

How is it possible that in these cost-benefit ratio estimates, there's no financial accounting for the fish, salmonids, and the estuary that is no longer available to them, yet essential to their survival?

SL3 is much more complex.

It involves fencing, signs to limit access, 30 years of post-construction monitoring, an environmental covenant, and a commitment to maintenance by Rayonier.

It should be easy to build, yet SL5 is underscored at 6, as excavation, loading, and transfer are well-known technologies.

On the other hand, SL3 has been over-scored at 9 with complex engineering for erosion-proof 7-foot (possibly more, depending on sediment findings) fenced 10-acre mound, considering sea level change, inclement weather, and an environmental covenant are the factors NOT being considered in this over-scoring of SL3.

Compliance with the Comprehensive Plan is not considered in estimates.

We need a PERMANENT resilient solution and consideration of modeling and repair challenges to design, construct, and maintain the consolidation area. The cost estimate must recognize that SL3 is more complex and will cost more than SL5 to design and maintain.

These discrepancies and oversights make it clear that SL5 is the actual correct choice of preferred solutions.

We request that SL5 be the preferred and permanent solution to this long-delayed toxic cleanup.

Steelquist, Peter on behalf of the Surfrider Foundation

Date: 8/12/25
Method: Website
Comment: See below and the following two pages.

Please see attached document.

August 10, 2025

Marian Abbett, Site Manager
Washington Department of Ecology
PO Box 47775
Olympia, WA 98504-7775

RE: Port Angeles Rayonier Mill 2025 Comment Period

Thank you for this opportunity to comment on the proposed Port Angeles Rayonier Mill Cleanup comment period.

The Surfrider Foundation is a non-profit dedicated to the protection and enjoyment of the world's ocean, waves, and beaches for all people. Our network focuses on coastal issues, including clean water, plastic pollution, beach access, climate change, and coastal resilience. On behalf of our broader statewide membership of thousands of ocean users and coastal stakeholders, Surfrider Foundation appreciates this opportunity to provide feedback and recommendations on the Port Angeles Rayonier Mill Cleanup comment period.

Surfrider Washington strongly recommends that the Department of Ecology select Alternative SL5, the most comprehensive option for the cleanup of the Rayonier mill site. This is a critical matter for the health of our community and the unique marine habitat of the Port Angeles waterfront and harbor.

The Importance of a Thorough Cleanup

The Port Angeles waterfront is a vital marine habitat and a special place for recreation. It is essential habitat for salmon, migratory birds, eelgrass, and our endangered Southern Resident killer whales. The Rayonier mill site, and the Ennis Creek Watershed, were among the most contaminated sites in Washington State. Previous to its closure, the mill was one of the worst polluters in the state, and its legacy of contamination remains a significant threat.

The site is still extremely contaminated with **PCBs, dioxin, and heavy metals**, which pose long-term threats to the ecosystem and the community. The City's Comprehensive Plan acknowledges that this is an extremely valuable area, designated for high-intensity mixed-use opportunities. A complete cleanup and permanent solution are long overdue.

Concerns with Alternative SL3

We are concerned that Alternative SL3, which involves simply capping the site, is not a long-term solution. This approach is a "band-aid" that fails to address the true costs of remediation and will ensure these pollutants continue to impact our community for years to come. Simply capping and cordoning off the site is not an acceptable solution, as it ignores future risks like **sea-level rise, coastal erosion, earthquakes, tsunamis, or flood events** that could compromise the cap and re-release the toxic materials.

The Case for Alternative SL5

We believe that SL5, which involves the removal of all contaminated soil, is the best and only lasting solution. It will allow for future mixed-use land development and has the greatest long-term benefit for the health of the community.

We would like to speak to ECY's Disproportionate Cost Analysis for the different alternatives. We believe the benefits scoring for each option does not accurately and comprehensively reflect a reliable cost-benefit analysis. We are concerned that under SL3, the true costs are not estimated well, and the costs of SL5 are over-exaggerated. The benefit difference between the two alternatives is not as narrow as the current scoring suggests.

In conclusion, we strongly recommend that Ecology chooses the plan that removes all contaminants (SL5) instead of just capping the site (SL3). This permanent solution should be addressed in the shortest possible timeframe to protect our community and our environment.

Pete Steelquist
Washington Policy Manager

Liz Schotman
Washington Regional Manager

Surfrider Foundation Washington | washington.surfrider.org

Stephanz, Nancy

Date: 7/23/25
Method: Website
Comment: See below.

I do not believe that a covering of fabric and soil is adequate to protect the ecosystem of the area of Rayonier's former mill site. We have small earthquakes here frequently. One of these could disrupt the covering enough to make the toxins circulate in the water column. This would violate treaties we have with tribes and further impair our efforts to restore their traditional fisheries.

Require a Level 5 clean up effort. The polluted waste can be dredged up, loaded on barges, and shipped to an inland landfill. Rayonier profited from this mill. They, not the State of Washington or the taxpayers of Washington, must pay to clean up their waste.

Nancy Stephanz

Straits, Jessica

Date: 8/12/25
Method: Website
Comment: See below.

I'm writing to express my strong support for cleanup alternative SL-5. It's so important that we prioritize the long-term physical and mental health of the people in our community. Protecting our environment is just as important, both for its health and for creating safe opportunities for our community and local economy to growth and thrive. SL-3 does not provide lasting environmental protection and could leave behind risks that make it harder for our area to recover. SL-5 is the only option that ensures a permanent cleanup and truly reflects a commitment to our community's future.

Swann, Vicki

Date: 8/12/25
Method: Website
Comment: See below.

Washington Department of Ecology, Publication 25-09-092 by the Toxics Cleanup Program proposes the contaminated soils will be compacted into a dense area, essentially a shallow grave, with a fence and signage warning people away. This is not a clean-up plan. This is a costly plan to leave a worse situation.

These now concentrated toxins will be left to leach and continue contamination of the area. A post implementation revision to Figure 5, Page 4 should show the Cap Area as a concentrated contamination site.

How is this in line with the Department mission to proudly protect, preserve and enhance Washington's environment? Alternative SL-5 is the responsible plan.

Swartz, Pamela

Date: 8/12/25
Method: Website
Comment: See below.

Department of Ecology's mission statement: To protect, preserve, and enhance Washington's environment for current and future generations.

PROVE IT!! The corporate-friendly, citizen harming Option 3 is not consistent with their mission statement. Clearly, Option 5 is the only option that is consistent with their mission statement and the well being of current and future generations.

It is insulting to hear the Department of Ecology is more concerned with Rayonier's bottom line than fulfilling their mission statement especially considering the cancer causing toxic chemicals present in the soil and water at the Rayonier Mill site.

PAH exposure has been linked to various types of cancer, including lung, skin, bladder, and stomach cancer.

PCBs (polychlorinated biphenyls) are a group of man-made chemicals that have been linked to cancer in both animal studies and some human populations. While PCBs were banned in the United States in the 1970s, they persist in the environment and can be found in soil, water, and even some older products. Exposure to PCBs, particularly at high levels, has been associated with an increased risk of certain cancers, including liver and biliary tract cancers.

Dioxins, particularly 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD), are classified as probable human carcinogens, with strong evidence linking them to soft tissue sarcomas, Hodgkin's lymphoma, and non-Hodgkin's lymphoma. While some studies suggest links to other cancers like bladder, laryngeal, lung, and prostate cancers, the evidence is considered limited or suggestive. Dioxins are persistent organic pollutants that can accumulate in the environment and living organisms, primarily through dietary exposure.

Ammonia, while typically considered a toxic waste product, can play a surprising role in cancer. It's not just a byproduct of metabolism; it can also be a fuel source and signaling

molecule for cancer cells, influencing their growth, survival, and interaction with the immune system. Research indicates that ammonia can promote cancer cell proliferation, potentially contributing to tumor development and progression.

Total Petroleum Hydrocarbons (TPH) is not a single substance, but a broad category of hundreds of chemicals found in crude oil. Some TPH compounds, like benzene and benzo(a)pyrene, are known carcinogens. Exposure to TPH, particularly through certain pathways or specific compounds, can increase the risk of certain cancers.

Arsenic, specifically inorganic arsenic compounds, is a known human carcinogen and can increase the risk of developing certain cancers. Exposure to inorganic arsenic has been linked to cancers of the bladder, lungs, and skin. Additionally, it has been associated with cancers of the liver, prostate, and kidneys.

Phthalates, a group of chemicals, are known endocrine disruptors and have been linked to an increased risk of certain cancers, particularly breast and childhood cancers. Studies suggest that phthalate exposure can affect hormone-related cancers and may contribute to cancer development and progression, including chemotherapy resistance.

And the Department of Ecology is advocating for CAPPING this into the ground forever? Are you seriously kidding?

NO!! Rayonier Mill (who made many millions polluting this area) needs to collect, truck OUT and refill with clean soil - the ENTIRE SITE!!

OPTION 5 is the only choice, unless that State of WA wants to be in legal challenges to their corporate friendly OPTION 3 choice.

Taft, Caleb

Date: 8/12/25
Method: Website
Comment: See below.

As a Port Angeles resident, I strongly urge the complete cleanup of the toxic Rayonier Mill site. Anything less is a betrayal of the public trust. Corporations must be held accountable for the impact of their business and harms of that business, whether operating or closed. Our watershed and bioregion, our communities and all its inhabitants deserve to be free of ongoing and future harms. We know that impact to air, water and soil impacts the lives, livelihoods and health of this entire region. We ask you to do the ethical, moral and integrity-filled thing by a complete cleanup of this site.

Taggart, Andrew

Date: 7/24/25
Method: Website
Comment: See below.

It is the responsibility of the parties that caused this mess to clean it up. Simple as that.

Targan, Julianne

Date: 7/24/25
Method: Website
Comment: See below.

The proposed cap solution for the destruction of the Port Angeles strait ecosystem by Rayonier is an unacceptable attempt to finally be done with the liability of the mess and a blatant attempt to choke off the voices of our citizens and make the whole problem “go away”. It's an incomplete remediation, and as such, is clearly substandard. There's no past behavior by Rayonier that would engender confidence in their commitment to monitor to site long term in good faith.

I'm TOTALLY opposed to the solution put forth by Dept of Ecology and Rayonier. Clean it ALL up properly once and for al!

Taylor, Kathryn

Date: 8/3/25
Method: Website
Comment: See below.

We need a permanent solution which is removal of the toxic material from the Rayonier Mill site. This is the only viable solution.

Thompson, Dean

Date: 7/24/25
Method: Website
Comment: See below.

Please consider option 5, entire removal of soil so the site is fully taken care of not just given a blanket top coat

---

Toschlog, Cletus

Date: 8/11/25
Method: Email
Comment: See below.

I support the permanent solution of Alternative SL-5 for contaminated soil and sediment at the former Rayonier Mill site in Port Angeles, WA. Proposed Alternative SL-3, leaving contaminated soil in place forever in a capped mound which will greatly limit future development, is unacceptable.

Cletus Toschlog
1012 W 6th St, Port Angeles, WA 98363

Tracy, Shawn

Date: 8/12/25
Method: Website
Comment: See below.

I am asking for the SL5 cleanup option, and for the company that left the materials in this location to be held accountable for a full cleanup. Others have submitted documentation which shows how a partial cleanup would be more expensive in the long run and have potential continued long term contamination esp to Ennis Creek."

Tuller, Cheyenne

Date: 8/6/25
Method: Website
Comment: See below.

For the benefit of Rayonier, future generations, and the restoration of the estuary and creek, the cleanup should be permanent. The proposed SL3 clean up is based on faulty, exaggerated information from consultants hired by the mill industry. SL5 is permanent and allows property reuse. We request that SL5 be the preferred and permanent solution to this long-delayed toxic cleanup.

Ulsund, Kristin

Date: 8/10/25
Method: Website
Comment: See below.

Regarding the clean-up of the old Rayonier site in Port Angeles, Option 5 (complete removal of hazardous materials off-site) is the ONLY acceptable option! Our community should not be saddled with Rayonier's dangerous materials any longer. We deserve to have our waterfront restored to us, and to have it be a safe place free from hazardous materials! Rayonier will have to find a way to pay for this as it is the right thing and the only safe, fair solution to a problem that has existed far too long!

Thank you.

Ulsund, Kristin on behalf of First Street Haven, Inc

Date: 8/10/25
Method: Website
Comment: See below.

With regard to the mitigation of the hazardous waste at the old Rayonier mill site in Port Angeles, I think it's of vital importance to commit to Option 5 (complete removal of waste away from the site). As a local business owner in a town where tourism is vital to our success, having the waterfront restored and safe is crucial to both locals and as a draw to visitors. Any plan other than Option 5 is a cop out and is unacceptable! It's long past time for Rayonier to clean up after itself! Thank you.

Uraga, Elizabeth

Date: 8/10/25
Method: Website
Comment: See below.

I support the permanent solution of Alternative SL5 for contaminated soil and sediment at the former Rayonier Mill Site in Port Angeles WA. Proposed Alternative SL3 which leaves contaminated soil on site forever limits future development. It is not acceptable for current and future citizens.

Vail, Michele

Date: 7/21/25
Method: Website
Comment: See below.

I support and endorse the following comments (from a document provided by a great supporter of the environment, Robbie Mantooth):

Please remember ESP for remedial intervention NOW!

E for estuary — essential brackish water fish need for their bodies to adapt to leaving Ennis Creek for their growth in Port Angeles Harbor and beyond and then return to their home stream to spawn.

S for space —so stream waters can move more naturally, protecting spawning gravels, eggs and young fish.

P for pilings — Stop letting toxic creosote harm Harbor marine life.

And demand these overarching priorities as Rayonier's financial responsibilities:

- Complete cleanup.
- Restoration under Lower Elwha Klallam Tribe and Rayonier agreement.

Vail, Michele

Date: 8/3/25
Method: Website
Comment: See below.

There needs to be a higher level of 'cleanup' than I see in the plan documents. Mother Nature is great at restoration but needs to have a better place to start it's remediation!

Van Voast, Jordan

Date: 8/10/25
Method: Website
Comment: See below.

Subject: Please Choose Alternative SL5 for a Permanent Cleanup of the Rayonier Mill Site

Marian Abbett, Site Manager Washington Department of Ecology PO Box 47775 Olympia, WA 98504-7775

I am writing as a concerned citizen and a member of the Port Angeles community to express my strong support for Alternative SL5 for the cleanup of the former Rayonier mill site. This is a critical issue for the long-term health of our community and the unique marine habitat of our waterfront.

The Port Angeles waterfront is a vital resource and a home to critical species, including our endangered Southern Resident killer whales, salmon, and migratory birds. The contamination at the mill site, including PCBs, dioxin, and heavy metals, poses a significant and ongoing threat to this sensitive ecosystem.

Alternative SL3, which involves simply capping the site, is not a permanent solution. This temporary fix ignores the very real risks of sea-level rise, coastal erosion, earthquakes, and floods that could breach the cap and re-release pollutants into our waters.

A complete and permanent cleanup is long overdue. I urge you to select Alternative SL5, which involves the full removal of all contaminated soil. This is the only lasting solution that will truly protect our community and our environment for generations to come.

I believe the benefits of SL5 are vastly understated, and the costs of SL3 are not accurately estimated. The long-term health of our community is a benefit that cannot be measured in simple terms.

[Add a few sentences here about why the Port Angeles waterfront is important to you personally, or why you care about this issue.]

Please, for the sake of our community and our environment, choose Alternative SL5.

Sincerely,

Jordan Van Voast

Vess, Lora

Date: 8/12/25
Method: Website
Comment: See below.

I am writing to express my extreme concern regarding the Port Angeles Rayonier Mill proposed cleanup. Use of a protective cap on the property for contaminated soil fails to adequately guarantee safety to humans and wildlife now or in the future. One only has to consider the recent tsunami advisory to realize the limitation of this approach. Moreover, as the Department acknowledges, “The Harbor is located within the traditional territory of the Lower Elwha Klallam Tribe (LEKT), a federally recognized Tribe with treaty fishing,

hunting, and gathering rights in the Harbor, whose people have lived throughout the northern Olympic Peninsula, including the Harbor, for thousands of years" and furthermore with "a moderate to high probability of prehistoric to historic period Native American cultural resources in some portions of the mill property (Interim Action Plan)

The proposed approach is short-sighted, culturally insensitive, relies on limiting access and good faith efforts by Rayonier to "regularly" check on the cap, and a presumption that the land will remain zoned industrial. However, since the Department of Ecology recognizes that the land may be used for non-industrial purposes in the future, all efforts should be taken now for full remediation and clean-up of all heavy metals and carcinogens. SL5 should be the preferred and permanent solution to this long-delayed toxic cleanup.

Sincerely,

Lora Vess, PhD

Vickery Cook, JoAnn

Date: 7/23/25
Method: Website
Comment: See below.

I strongly advocate for Option 5 to clean up the Rayonier site. It only makes sense to recover and restore the site to its original state. For the health of the community and the environment, for the salmon and for Ennis Creek, the toxic materials need to be completely removed. It's the only right and honorable action.

Vine, Rachel

Date: 8/10/25
Method: Website
Comment: See below.

I am writing in support of a full clean up of the Rayonier Mill Site. The company benefitted from the usage of this land for many years, extracted a profit, and then left behind a poisonous problem for the community to deal with. The site leaks toxins into the environment, creating an unsafe situation for the human and animal residents of Port Angeles. Equity demands that the site is restored to a safe condition, so that the land is able to be used and enjoyed by the community. Capping the site is a temporary and

inadequate measure. Only a full and timely clean up will solve the problems caused by the many years of pollution and neglect.

Vito, Olivia

Date: 8/4/25
Method: Website
Comment: See below.

Rayonier has a responsibility to remove their toxic debris to an appropriate off site facility. Covering in place is not a viable option when this site is so close to the main population areas of Port Angeles; the largest town on the Olympic Peninsula and with high tourism visitation rates. Local, Tribal, State, and federal agencies have each spent millions on environmental restoration in the vicinity. Rayonier must pay their share and remove their debris as it is too toxic to cover and leave in place where it currently sites, adjacent to our homes, schools, and recreation areas.

Waknitz, John

Date: 7/25/25
Method: Website
Comment: See below.

The state and feds have let RAMP get away with doing nothing to clean up the mess they made. Fines have not pressured them to clean up the blight on our town. Get it cleaned up so it can be used for good instead of a run down industrial waste site. Return the land to the Elwha tribe or turn it into a city park.

Walls, Caroline

Date: 8/10/25
Method: Website
Comment: See below.

I support SL-5 and so should you! It is the only alternative that puts the people and environment of Port Angeles first! We deserve a full clean-up. Anything less than the full clean up in SL-5 is letting Rayonier off easily at the expense of our community.

Walthall, Margaret

Date: 7/2/25
Method: Website
Comment: See below.

The State must hold responsible, the mill that created this contamination. Because there were NT stricter regulations during the time it operated does not mean the mill is absolved if any damages to the environment. Ennius Creek and the surrounding area must be cleaned and rstored I order that salmon can once again actively contribute to the ecology of the creek and the Olympic Peninsula. Thank you for listening.

Margaret

Ward, Victor

Date: 8/10/25
Method: Website
Comment: See below.

I support the permanent solution of Alternative SL-5 for contaminated soil and sediment at the former Rayonier Mill site in Port Angeles, WA. Proposed Alternative SL-3, leaving contaminated soil in place forever in a capped mound which will greatly limit future development, is unacceptable.

Watt, PhD, James on behalf of the Washington Department of Health

Date: 8/12/25
Method: Email
Comment: See below.

Hi Marian,

Washington Department of Health, Site Assessment and Toxicology section (SATS) reviewed the Interim Action Plan for Port Angeles Rayonier Mill Study Area (Feb 2025), with particular interest in the proposed cleanup levels, conceptual site model, and future remedial actions as they pertain to protection of human health. SATS has the following comments/questions:

Pg. 30 – Section 4.2

In Section 4.2, the plan states that soil CULs are set to Unrestricted Land Use but suggests that this will be re-evaluated if the PLP demonstrates that future use of the land will be industrial. SATS recommends that this standard remains the most stringent to protect

human health, and as a corollary, it would allow for future unrestricted use of the property. Furthermore, in 6.2.1, the plan states that, “all soil exceeding the unrestricted land use soil CULs…will be excavated” and that soil will be sampled, “during remedial design to refine the remediation footprint both laterally and vertically”. With the soil standard open to being re-evaluated, it raises the possibility that the cleanup footprint will be reduced while this process is underway, should the CULs revert to industrial. It would be most efficient to excavate where applicable to the stricter standard while the process is already underway, rather than have to revisit this process in the future, introducing a new environmental impact. This would also provide a “more permanent cleanup action for all or part of the site”, as stated in section 6.3, Rationale for Selecting the Remedies.

Pg. 69 – Table 4-4

This shows the sediment cleanup levels (CUL) for the COCs. Although the table is titled, “Sediment Cleanup Levels Protective of Human Health”, for most chemicals the CUL is Regional or Natural Background. SATS agrees that these numbers are lower than those derived from human health screening calculations for specific populations interacting with the site, but it is inaccurate to infer that these values were derived from human health-protective exposure estimates. It would be informative to include, in the table, human health-based values (specifically, the most conservative, with the exposure model population identified) to provide this comparison, especially because MTCA permits cleanup screening levels to be set higher than levels based on protection of human health.

The Regional Background for cPAH TEQ is listed as 64 ug/kg, but in the cited Ecology document (North Olympic Peninsula Regional Background Sediment Characterization (2016)), cPAH TEQ is listed as 31 ug/kg (natural background 16 ug/kg). However, in Ecology (2016), there is also a Port Angeles-specific value of 64 ug/kg which used samples from Port Angeles Harbor combined with three other locations. This runs counter to WAC 173-204-560 (5)(d): “Calculation of regional background for a contaminant must exclude samples from areas with an elevated level of contamination due to the direct impact of known or suspected contaminant sources, including areas within a sediment cleanup unit or depositional zone of a discharge.” Although this cleanup plan follows the standard set by Ecology in the 2016 Regional Background document, it is worth stating that the Regional Background here includes Port Angeles-specific data that make the cleanup levels less conservative than if they had been derived from areas not influenced by the PLP.

Thank you for the opportunity to comment on this Interim Action Plan. Please feel free to reach out if you if have questions or would like any further clarifications.

James Watt, PhD
Pronouns: he/him

Toxicologist
Site Assessment and Toxicology Section
Environmental Public Health Sciences
Washington State Department of Health
james.watt@doh.wa.gov
doh.wa.gov | 564-669-4205

Wesley, Ethan

Date: 8/4/25
Method: Email
Comment: See below.

From: Ethan wesley ejamesw@hotmail.com
Sent: Monday, August 4, 2025 3:17 AM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Subject: Rayonier Mill Site, Port Angeles Greetings,

Regarding the restoration at the waterfront in Port Angeles on the old Rayonier Mill Site.....complete — Level 5 — cleanup, nothing less. Rayonier pays for every penny.

Best Regards,

Ethan Wesley
Seattle, WA
Born and Raised In Port Angeles

Wesley, James

Date: 8/3/25
Method: Website
Comment: See below.

I can't think of a more broadly based local issue that has triggered the overwhelming and unanimous public response Ecology is receiving on implementation of SL5 for eliminating the ongoing environmental, economic, and health risk damage emanating from Rayonier's 80 acre mill site. Rayonier has been coddled since '97 with one extensive study/report after another allowing it to skate by for 28 years without financing a permanent/comprehensive rehabilitation of what existed as a spectacular example of what made the North Olympic

Peninsula shoreline the world class attraction it is. This lack of financial responsibility by Rayonier for covering the complete and total costs of its own environmentally bankrupt behavior sticks deeply in the craw of this community while expensive tax-funded remediation for enhanced anadromous fish passage is currently conducted within 2 miles of Rayonier's desecrated mill site just upstream on the same body of water Rayonier trashed down below near the beach: ENNIS CREEK! Neither the public funding of the Department of Ecology's oversight on the mill site fiasco nor the fish enhancements under Hwy 101 on Ennis Creek are of ANY benefit to this area without the full implementation of SL5.

Wesley, Kathy

Date: 8/3/25
Method: Website
Comment: See below.

The unanimous voices for SL5 have been received by the Washington State Dept of Ecology from the Port Angeles City Council, the Clallam County Board of Commissioners, the Port Angeles Business Assn., the North Olympic Peninsula tribes, and countless members of the general public. The remediation plan needs to involve the complete and total removal of ALL contaminants to an EPA approved treatment/storage facility, complete restoration of the Ennis Creek estuary for reestablishment of the once highly productive anadromous salmon runs, and proceed in an expeditious manner given the 28 year delay for getting this remediation even started.

West, Nathan on behalf of the City of Port Angeles

Date: 8/7/25
Method: Website
Comment: See below and the following 17 pages.

Please see attached.

PORT ANGELES
WASHINGTON, U.S.

321 East Fifth Street
Port Angeles, WA
98362

August 7, 2025

Marian Abbett, Site Manager
Washington Department of Ecology
PO Box 47775
Olympia, WA 98504-7775

Dear Ms. Abbett,

The City of Port Angeles thanks you for the opportunity to comment on the Consent Decree, Draft Interim Action Plan, and SEPA Determination of Non-Significance for the Rayonier Mill Site in Port Angeles, WA. On July 22, 2025, City Council voted unanimously to direct staff to request a complete, timely, and high-quality cleanup of the Rayonier Mill Site, urging the Washington Department of Ecology to select alternative five (SL-5). The comments below reflect this decision.

The current selected soil remedy in the Interim Action Plan proposed by Rayonier and presented by the Department of Ecology is unacceptable. The consolidation of contaminated soils and sediments would result in a 10-acre, seven-foot-tall mound of contaminated land, subject to ongoing monitoring and maintenance of a protective cap. The selected location of these contaminated soils and sediments is in the site's most suitable location for future development opportunities. The location also directly adjoins the boundary for shoreline protection and will intrude into this protection area once necessary restoration of the fill, dock and jetty are remedied in accordance with the State Department of Natural Resources lease. This proposed method of remedy is inconsistent with the planned future land use of the site that is being adopted in the 2025 City of Port Angeles Comprehensive Plan Update. The upshot of the combination of these factors means there is not one bit of permanency in this remedy. It will have to be physically altered at some point in the future, and we in the City of Port Angeles hope that point comes sooner, not later.

For several years now, the City has planned for mixed-use development of the site, with a focus on a mix of commercial, residential, recreational and conservation related uses. SL-3 not only significantly reduces the amount of usable space available for future development, it also does not meet cleanup standards to "protect human health and the environment for current and *potential future* site and resource use" as required by the Model Toxics Control Act. A full cleanup including the complete removal of all contaminated soils is the only permanent, practicable solution to allow for any potential future development opportunities to occur.

Attached you will find a Summary of Technical and Legal Flaws regarding the Interim Action Plan as well as an Interim Action Plan Soil Remedy Evaluation memorandum provided by Nicole Ott of Integral Consulting highlighting the cost estimates and disproportionate cost analysis having artificially inflated the favorability of SL-3 over SL-5. Through incorrectly assessed indirect costs, construction costs, failure to consider the costs for sediment dredging, and the underestimated operation and maintenance costs associated with long-term ecological monitoring, the actual cost difference between SL-3 and SL-5 is unlikely to be $27 million. Ecology should prepare a more careful consideration of costs that reflects the uncertainties, complexities, and lack of permanence of SL-3. The City has made a substantial investment in these comments with a desire to aid and equip Ecology with the information necessary to re-evaluation the current recommendation.

Based on the above details it is imperative that you to reconsider your decision on the selected soil remedy of SL-3 and move to a more permanent and stringent cleanup of the site using soil remedy SL-5. This is the only path forward to allow for the complete and final cleanup of the site so that it may be used to its fullest extent by generations to come.

Thank you,

Nathan A. West
City Manager

8/7/2025
Date

Summary of Technical and Legal Flaws on Rayonier Interim Action Plan

Inaccurate Cost Estimates and Benefit Valuation

The attached technical memorandum by Integral Consulting identifies and analyzes the technical flaws in the soil remedy selection under the February 2025 draft Interim Action Plan (IAP). These technical flaws are briefly summarized below:

- SL-5, which involves offsite disposal of contaminated soil, is undisputedly the most permanent and protective solution and thus the preferred remedy unless its costs are "disproportionate" to its benefits. Because of problems with the estimations of remedy costs and valuation of benefits, the City does not believe the SL-5 costs are disproportionate.
- The selected remedy, SL-3, does not align with the City's 2025 Comprehensive Plan, which designates for mixed-use development the area that SL-3 would use for a contaminated-soil landfill. SL-3 would likely hinder such future redevelopment opportunities by increasing engineering challenges and cost constraints.
- The justification behind SL-3 relies heavily on long-term institutional controls (like an environmental covenant, fencing, and signage) and engineered caps. Unlike SL-5's more permanent solution, these controls are vulnerable to future failures, erosion, and climate impacts.
- The SL-3 cost estimate is almost certainly too low. It does not account for additional contaminated material that may be found and removed from the shoreline. It also fails to account for the complexity of design, engineering, operation, and long-term maintenance for SL-3. And the estimated costs for long-term monitoring and maintenance are unrealistically low and do not meet regulatory standards for ensuring long-term protectiveness.
- In contrast, SL-5 costs are likely overestimated. In particular, indirect costs for SL-5 are likely overestimated, as the calculation method is not representative of how straightforward excavation and off-site disposal is as a remedy.
- The benefit scoring for SL-3 is likely inflated, particularly regarding technical and administrative implementability, while SL-5's straightforward approach is undervalued. To take one example, SL-3 could pose future risks if hazardous or dangerous wastes are discovered, and the current plan lacks contingencies for such discoveries.

For these reasons, the City encourages Ecology to reassess both the benefit scoring and cost estimates for SL-3 and SL-5 and consider the long-term effectiveness and redevelopment potential offered by SL-5.

Ecology Authority to Select Remedy that is PMEP

Where, as here, Ecology has ordered a remedial action under an Agreed Order, it has broad authority to select and enforce the remedial action. WAC 173-340-510, -530. Even after doing so, it "may require additional remedial actions should it deem such actions necessary." WAC 173-340-530(1).

Ecology has statutory authority to "give preference to permanent solutions to the maximum extent practicable and . . . provide for or require adequate monitoring to ensure the effectiveness of the remedial action." RCW 70A.305.030(1)(b). A performing party must follow the remedy-selection requirements in the cleanup rule, including the stepwise disproportionate cost analysis (DCA) process for selecting the remedy that is permanent to the maximum extent practicable (PMEP). "The estimation and comparison of benefits and costs may be quantitative, but will often be qualitative and require the use of best professional judgment." WAC 173-340-360(5)(c)(i)(A).

2025 DCA Guidance: Ecology recently issued guidance on using the DCA process to select a remedy that is PMEP. Ecology TCP, *Guidance for Determining if a Cleanup Action uses Permanent Solutions to the Maximum Extent Practicable using Disproportionate Cost Analysis*, Pub. No. 25-09-059 (Feb. 2025). Relevant to selecting a soil remedy for the Rayonier Study Area, this guidance emphasizes the use of best professional judgment and sensitivity analysis when conducting a PMEP evaluation. *Id.*, ch. 9. The guidance is precise regarding methods for performing a sensitivity analysis. *Id.,* § 9.3.

The guidance emphasizes that "Ecology retains all authority to determine compliance with state cleanup law requirements." Id., § 9.4. This includes "[w]hether an alternative meets cleanup action requirements, including whether it is PMEP." *Id.* (citing WAC 173-340-130(9)). It states:

> When conducting a PMEP evaluation, . . . Ecology may use best professional judgment to:
>
> - Weight the benefit criteria.
> - Estimate the costs and degrees of benefits of each alternative.
> - Favor or disfavor qualitative benefit and cost estimates in the analysis.
> - For each iteration of the DCA in Step 4 of the PMEP evaluation, determine whether the baseline alternative is practicable (more cost-effective) compared to the next most permanent alternative on the ranked list.

*Id. "*The benefit criteria may be weighted, but *any unequal weights need to be justified.*" *Id.*, § 9.3 (emphasis added).

Ecology must follow its own guidance in selecting a remedy. *See* Draft IAP, § 6.4 ("The "relevant and appropriate requirements" include regulatory requirements and guidance that have been determined to be appropriate for use by Ecology.").

Perhaps because of how recently the guidance was issued, Ecology and Rayonier do not appear to have considered it in the draft IAP. **In revising the draft IAP, Ecology should take the opportunity to implement the new PMEP guidance**, including applying its best professional judgment to the estimated costs and benefit scores assigned by Tetra Tech in the DCA (*see* Agreed Order Task 4e Deliverable Interim Action Report Volume III: Alternatives Evaluation, § 6 (Sept. 1, 2021)), justifying the unequal weights used in the DCA, and performing a sensitivity analysis.

In short, Ecology has express regulatory authority to re-examine and revise the cost and benefit determinations and procedural deficiencies in the IAP's DCA, particularly in this supervised cleanup where the agency retains ultimate decision-making responsibility. RCW 70A.305.030.

Sea-level rise (assuming uplands remediation is in shoreline jurisdiction): Ecology is required to ensure that remedial actions comply with substantive requirements of the SMA and regulations and shoreline master programs issued pursuant to the SMA. See RCW 70A.305.090(1). Ecology is in the process of revising its rules governing shoreline master program guidelines. See preliminary draft revisions to ch. 173-26 WAC. The final rules will require that any construction within SMA jurisdiction account for sea-level rise impacts.

In addition, the MTCA rule revisions in 2023 specified that **a cleanup action must "[p]rovide resilience to climate change impacts that have a high likelihood of occurring and severely compromising its long-term effectiveness." -360(2)(a)(v)**. It is not clear that this requirement has been accounted for given the proximity that the contaminated landfill under SL-3 will have to Port Angeles Harbor. (NOTE: Sea level rise was analyzed in IAP, Vol. III (2021) for the sediments cleanup, but not the uplands work.)

Integral Consulting Inc.
2025 First Avenue
Suite 310
Seattle, WA 98121

www.integral-corp.com

MEMORANDUM

To:	Nathan West and Calvin Goings, City of Port Angeles
From:	Nicole Ott and Elena Downs, Integral Consulting
Date:	August 4, 2025
Subject:	Interim Action Plan Soil Remedy Evaluation: Port Angeles Rayonier Mill Study Area, Port Angeles, Washington
Project No.:	CF935A

Integral Consulting Inc. (Integral) is pleased to submit this memorandum providing comments for the City of Port Angeles (City) to incorporate into its formal public comment letter to the State of Washington Department of Ecology (Ecology). A public comment period is open from June 12 to August 12, 2025. Ecology is considering public input on its version of the Interim Action Plan for the Rayonier Mill site, drafted in February 2025. Integral's comments relate only to the analysis of the proposed alternative for soil remediation in the upland portion of the site. The Interim Action Plan also addresses groundwater and sediment remedial alternatives. Ecology held a public meeting presenting the plan and addressing public questions on July 8, 2025.

This memorandum discusses adjustments to the Disproportionate Cost Analysis (DCA) that would align it with Ecology's recent guidance[1] and lead toward identification of SL-5 as the selected soil remedy (as opposed to the currently-selected remedy: SL-3).

SOIL SELECTED REMEDY

Ecology has selected soil remedy SL-3, which involves excavation of soil exceeding unrestricted land use criteria and consolidating that soil within a 10-acre fenced area on the western side of the Rayonier Mill site. The consolidation area shall also receive and store in perpetuity impacted sediment dredged from the nearshore areas around the mill. The pile of contaminated soil and sediment would be approximately 5 feet (ft) tall and covered with a 2-ft thick cap.

[1] Ecology 2025. Guidance for Determining if a Cleanup Action uses Permanent Solutions to the Maximum Extent Practicable using Disproportionate Cost Analysis. Public Comment Draft. February 2025, Publication 25-09-059.

In the Interim Action Plan, Ecology uses a DCA to identify a selected remedy for each medium. The DCA relies on analyses in the 2019 *Interim Action Report Volume III: Alternatives Evaluation Report* to identify soil remedy SL-5 (which involves excavation and offsite/landfill disposal of impacted soil) as the most protective, permanent remedy, i.e., SL-5 had the greatest benefit score of the soil alternatives evaluated. However, Ecology estimated the cost of SL-5 ($37 million) to far exceed the cost of the next-highly scored remedy (SL-3; cost = $10 million). And so, Ecology determined that the added benefit of SL-5 relative to SL-3 (1.1; shown in table below) does not outweigh the added cost.

Ecology is required by the Model Toxics Control Act (MTCA) to select the most permanent solution to the maximum extent ***practicable***. The term "practicable" introduces the comparison of estimated costs when evaluating remedial alternatives.

Ecology chose SL-3 as the selected remedy based on the DCA, which envisions a $27 million cost difference between SL-3 and SL-5 relative to only a 1.1 incremental benefit (as shown in this table).

Soil Remedial Alternative	Cost	Benefit Score
SL-3	$10 million	7.8
SL-5	$37 million	8.9
Increment SL-3 to SL-5	$27 million	1.1

If these numbers fully reflect the remedy to eventually be constructed, clearly $27 million is not a proportionate cost to add 1.1 point more benefit. But the estimated cost for SL-3 is lower than the expected future cost, and the benefit for SL-3 is scored too high, as noted in these comments. Integral Comments on the Selected Soil Remedy (SL-3).

Integral has prepared the following comments on the soil remedy, comparing the selected remedy SL-3 to the more protective and permanent soil remedy SL-5.

The selected remedy does not appropriately reflect future land uses.

Ecology's selection of SL-3 uses, as support, the current land use zoning distinction of heavy industrial and the lack of any current redevelopment plans for the Rayonier Mill site.

However, the City of Port Angeles 2025 Comprehensive Plan Volume 1 (May 2025 draft version) designates the proposed soil and sediment consolidation area as Mixed Use, intended to include a variety of commercial, retail, and residential land uses. This

designation is established due to factors including economic potential, public shoreline access, and housing needs. The Comprehensive Plan notes an ongoing community conversation regarding the Rayonier Mill site and whether, given its unique context and opportunity, the Rayonier Mill site should have a specific land use designation.

The law[2] requires that both cleanup standards and cleanup actions must "protect human health and the environment for current and potential future site and resource use." Any selected remedy must be designed and implemented to not impede future land use options at the site, which would likely include buildings and improvements. The 10-acre capped area proposed in SL-3 would be a fenced private landfill estimated to raise the ground level by 7 ft across its span (5-ft height of impacted material covered with a 2-ft thick cap). This remedy is inappropriate for the future land uses described in the Comprehensive Plan.

The consolidation area is slated to contain both soil and sediment. Some of the sediment areas subject to dredging have been delineated. However, the sediment remedy also specifies removal of the jetty and wharf structure, along with reshaping of the northerly shoreline back to no longer lie on state-owned land. If sampling of sediment under the removed structures and of the soil/beach material to be removed from the shoreline reveals contamination, that material may also be subject to storage within the consolidation area. Such additional material will affect the design, schedule, and costs of soil remedy SL-3.

The proposed placement of approximately tens of thousands of cubic yards of contaminated sediment beneath the cap is also likely to cause significant engineering and cost constraints that would restrict future land use of the Rayonier Mill site.

The selected remedy relies heavily upon institutional controls to satisfy the selection criteria set forth within the Model Toxics Control Act.

Development of the capped area will be limited by numerous legal and logistical challenges. Remediation through the selected remedy (SL-3) would require a restrictive environmental covenant limiting land use over the capped area and requiring approval by Ecology, and a public notice and comment period for uses inconsistent with the covenant. As required in WAC 173-340-600(14)(c), whenever a cleanup action plan proposes a restrictive covenant, Ecology must provide notice to and seek comments from the City of Port Angeles, and potentially from Clallam County, regarding the restrictive covenant.

[2] WAC 173-340-702(4)

MTCA provides requirements for cleanup actions and delineates a decision-making framework for selecting and evaluating alternatives.[3] According to MTCA, an essential factor for selecting a remedial alternative centers around the permanence and long-term effectiveness of the action and requires that the selected remedy "uses permanent solutions to the maximum extent practicable.[4]" Excavation and offsite disposal of impacted soil, as proposed in SL-5, is the most permanent solution for the Rayonier Mill site and inherently provides a high level of protectiveness and effectiveness over the long term.

The long-term effectiveness of SL-3 depends upon maintaining the integrity of the cap. Institutional controls, area restrictions, long term monitoring, and maintenance of damaged features will be required into perpetuity, or until the land is redeveloped, will be required to ensure the cap remains sound and the contaminated soil and sediment consolidated onsite remain isolated from human and ecological receptors.

This is counter to MTCA requirements[5] that state that the cleanup should "not rely primarily on institutional controls and monitoring at a site, or portion thereof, if it is technically possible to implement a more permanent cleanup action." Within the Interim Action Plan, Ecology states that SL-3 does not rely primarily on institutional controls for "large portions of the property." However, the fact remains that under SL-3, a 10-acre area of consolidated, contaminated soil and sediment would remain onsite with an engineered cap sustained only through institutional controls, monitoring, and maintenance.

The failure of institutional controls could lead to human and ecological receptors coming into direct contact with contaminated soil and sediment, particularly given the fact that fencing is significantly limiting as a long-term, effective protective measure for a facility that is not actively managed. If the integrity of the cap is compromised, there is a risk of erosion and stormwater runoff carrying contamination outside the boundaries of the consolidation area. Cleanup action requirements set forth in MTCA also highlight climate change as an important component in assessing the long-term viability of a cleanup action.[6] The proposed capped area will be directly adjacent to the shoreline, set back approximately 200 ft. Factors such as sea level rise and inclement weather compounded by climate change significantly reduce the long-term viability and technical and administrative implementability of SL-3.

As noted during the July 8 public meeting, Ecology envisions extensive modeling and engineering during the remedial design phase to ensure that the cap over the

[3] WAC 173-340-360(3).
[4] WAC 173-340-360(3)(a)(x).
[5] in WAC 173-340-360(3)(a)(vii).
[6] WAC 173-340-360(3)(a)(v).

consolidation area is resilient and properly designed. However, this assumption places a lot of certainty into the eventual design, for which public comments will likely not be sought. Further, this extensive modeling and design is not fully factored into the cost estimate or implementability score for SL-3.

The cost estimates and disproportionate cost analysis inflate the favorability of the consolidation alternative (SL-3).

In accordance with MTCA, the Interim Action Plan employs a DCA as a primary mechanism to select a cleanup remedy.[7] The inputs to the DCA, cost estimates and benefits scores, were developed in the 2019 *Interim Action Report Volume III: Alternatives Evaluation Report* and have not been updated to support the 2025 Interim Action Plan. Further, they do not reflect recent (February 2025) guidance for selecting a remedy using a DCA.[8]

Although the off-site alternative (SL-5) was scored the highest for benefits (8.9), the DCA inputs discount the full benefits of that alternative and inflate the benefits of the capping-based alternative (SL-3, with a benefit score of 7.8).

This section discusses how the cost estimate underestimates the costs of SL-3 by reflecting upon line items in the cost estimates. It also discusses elements of the benefits scoring that are rated too high for SL-3.

The discussion does not include the costs (additional to the design, construction, and maintenance of the consolidation area) inherent within the SL-3 remedy, which encumbers the property from redevelopment potential, limits future property tax income for the City, and places a strain on a waterfront property because it is resigned to a derelict use as a fenced-off landfill.

Indirect Costs

Cost estimates typically include direct construction costs (e.g., the price to excavate soil, the cost to dispose of material in a landfill) as well as indirect planning, design, and maintenance costs. Typically, indirect costs are calculated as percentages of the total capital (direct construction) costs. So when the same percentages are used for different types of remedial alternatives, they don't allow for the individual cost items to reflect any nuances or complexities that would be a part of those items in the future.

[7] WAC 173-340-360(5)(c)(iv).
[8] Ecology 2025. Guidance for Determining if a Cleanup Action uses Permanent Solutions to the Maximum Extent Practicable using Disproportionate Cost Analysis. Public Comment Draft. February 2025, Publication 25-09-059.

For each remedial alternative, the cost estimate used as the basis of the DCA applies the same percentage (relative to the construction cost) for each of these professional and technical services: 12% for remedial design; 5% for permitting coordination/fees; 2% for contractor submittals; 8% for construction management; 10% for project management; and 2% for Ecology oversight. These percentages, although based upon professional judgement and EPA's Guide to Developing and Documenting Cost Estimates During Feasibility Study, EPA 540-R-00-002, don't account for the complexity and long-term commitments inherent in SL-3. Because the indirect costs are calculated as a straight percentage of the construction costs, SL-3 indirect costs ($2.65 million) are too low to account for the complexity of the work and the maintenance needed after construction to maintain the consolidation area. For comparison, the indirect costs for SL-5 (which is a more standard/straight forward excavation and offsite disposal [dig and haul] remedy with no post-construction maintenance needed) are too high at $8.9 million.

Because the $27 million difference in cost between SL-3 and SL-5 forms the basis for Ecology's selection of SL-3 over SL-5, the estimated costs need to clearly and accurately reflect the work involved. Looking at indirect costs alone, there is a $6.25 million difference between SL-3 and SL-5. As described below, SL-3 is more complex and more subject to re-work than SL-5. Therefore, the indirect costs for SL-3 should actually be higher than those for SL-5. The apparent $6.25 million lesser cost for SL-3 than SL-5 does not reflect the real cost savings likely to be realized if SL-3 is implemented.

Keeping with the general principle of economies of scale, the fraction of costs of professional and engineering services, relative to the construction costs generally decrease as the cost/size of that construction increases. SL-5, the excavation and offsite disposal option, is a fairly routine remedial technology, which is certainly less involved from an engineering standpoint than construction of a consolidation area managed into perpetuity. Thus, the cost for professional aspects of SL-5, such as project management, construction management, design, and Ecology oversight, would not represent the same proportion of the construction costs as they do for the more involved complicated remedy (SL-3).

The indirect costs for SL-5 are additionally over-estimated because they are estimated as a proportion of capital costs inclusive of the transportation and disposal costs. The inclusion of transportation and disposal infuses a large sum into the basis without a corresponding increase in the complexity or needs in professional and technical services.

Additionally, the relative percentage assigned for elements such as contractor submittals, remedial design, and permitting and coordination should be higher for SL-3 than for SL-5 due to the higher inherent complexity of designing, constructing, and ensuring the longevity of the SL-3 engineered cap than managing the SL-5 offsite transportation and disposal. Many complex elements associated with the submittals for SL-3 are discussed only in passing within the Interim Action Plan. The plan instead punts these complexities

to the engineering design phase. The areas of increased complexity for SL-3 relative to SL-5 include, but are not limited to:

- **Pre-Design Investigation**: Within the cost estimate, pre-construction soil investigation is set at a lump sum price of $250,000 for SL-3 as compared to $500,000 for SL-5. However, soil investigations for either alternative will require large scale testing for excavation area delineation, waste characterization, and import material suitability. The investigation costs for SL-3 are set too low.

- **Design and modeling**: Both SL-3 and SL-5 involve design and planning for excavation and backfill. In addition to that aspect, SL-3 includes the more technically involved task of design for consolidation and capping of a structure that must withstand inclement weather and must align with the eventual reconfiguration of the shoreline. Additional investigations and modeling will be required to ensure the stability of the capped area during inclement weather, earthquakes, or sea level rise. These costs need to be considered in the SL-3 cost estimate.

- **Coordination with sediment investigation and remediation:** The volume that will be included in the consolidation and capping area is contingent upon the results from both the soil and sediment pre-design investigations. The capped volume could also include sediment dredged from under the jetty and wharf structure following removal and sampling activities. Design and modeling for the capped area cannot be completed until the volume and character of both the soil and sediment are investigated, and therefore the true costs of the consolidation (SL-3) remedy are not accounted for.

- **Restrictive Covenants Preparation:** Both SL-3 and SL-5 include a lump sum cost of $75,000 for preparation and filing of restrictive covenants on the Rayonier Mill site. However, because the SL-5 remedy uses excavation and offsite disposal of all soil contaminated over the unrestricted land use criteria, the property will not be encumbered with any restrictions. Thus, there is no need for any restrictive covenants under the SL-5 remedy, and therefore the indirect cost subtotal for SL-5 is at least $75,000 too high.

Construction Costs

The only transportation and disposal related cost included in the cost estimate for SL-3 is for the disposal of demolition debris related to the removal of concrete pads at a rate of $18.80/cy ($9.40/ton). The rate provided for demolition debris disposal (used in all SL-1 through SL-5) is substantially lower than the $80.00/ton transportation and disposal for soil going to a non-hazardous Subtitle D landfill in SL-5. The Volume III report does not clarify the location of disposal for the SL-3 construction debris, stating only that the debris

will be "disposed of in a RCRA Subtitle D solid waste landfill or, in certain circumstances, in a demolition debris landfill."

In the event that future sampling reveals contaminant concentrations that exceed Washington dangerous waste regulations thresholds[9], offsite disposal in a Subtitle C hazardous waste facility will be necessary. State and federal land disposal restrictions prohibit onsite disposal of certain hazardous or dangerous wastes[10] such as dioxins/furans exceeding 0.01 ug/kg (ppb) toxic equivalents or soil or sediment material found to be a characteristic dangerous waste under WAC 173-303-090 (e.g., fails Toxicity Characteristic Leaching Procedure testing).

An additional consideration is the federal and state prohibitions on dilution[11] meaning that hazardous or dangerous waste cannot be mixed with or consolidated into nonhazardous material to dilute and avoid designation. The Applicable or Relevant and Appropriate Requirements (ARAR) within the Interim Action Plan note that soil and sediment managed by upland disposal will comply with disposal site criteria. There is no mention or contingency present within the cost estimate for SL-3 considering the possibility of offsite disposal or segregation of any material that fails the dangerous waste designations.

Coordination with Sediment Remedy

The cost estimates for the soil and sediment remedial alternatives are separate and evaluated in a vacuum within the Interim Action Plan. However, because SL-3 includes consolidation and capping of dredged sediment, the sediment soil remedies are inextricably linked and have the potential to complicate one another.

Further, the chemical character of the sediment underlying the jetty and wharf is currently unknown. Any future sampling may reveal additional sediment (beyond the nearshore dredging already scoped) to be dredged and disposed in the consolidation area (SL-3). This would grow the footprint and complicate the design, scheduling, construction, and long-term maintenance of the soil remedy SL-3.

The DCA must consider the additional costs, contingencies, complications, and schedule and design implications that selecting SL-3, which includes dredged sediment, would involve.

[9] WAC 173-303
[10] WAC 173-303-140(4); 40 CFR Part 268.
[11] 40 CFR § 268.3, WAC 173-303-150(1).

Operation and Maintenance (O&M) Costs

Although SL-3 leaves a consolidation pile of capped and contaminated soil and sediment on the Rayonier Mill site in perpetuity, the total cost for all post-construction activities for SL-3 is estimated to only be $127,896. This very low estimate significantly ignores or under-values several necessary post-construction activities. As noted in Section 7.1.2 of *Guidance for Determining if a Cleanup Action uses Permanent Solutions to the Maximum Extent Practicable using Disproportionate Cost Analysis*[12], the following post-construction costs should be included in any cost estimate supporting a DCA:

- Operation and maintenance activities necessary to maintain the effectiveness of a constructed cleanup action component.
- Waste management and disposal
- Replacement or repair of equipment (including labor, equipment, and materials)
- Permit renewal
- Compliance monitoring (including sampling and analysis)
- Maintaining institutional controls
- Financial assurances
- Periodic reviews
- Post-construction management
- Regulatory oversight.

Generally, in engineering cost estimation, operation and maintenance (O&M) costs are calculated on an annual basis, with additional periodic costs (e.g., five-year reviews, some proportion of remedy replacement/repair) considered and calculated outside of base annual expenses. Within the life-cycle cost estimate for SL-3, annual cap monitoring, maintenance, and reporting costs are provided on a per acre basis and reporting is assumed to only occur 11 times over the lifetime of the pile (years 1, 2, 3, 4, 6, 8, 10, 15, 20, 25, and 30). Within the cost estimate, the total direct O&M costs are projected to be an undiscounted cost of $161,700 calculated using a rate of $1,500 per acre (over 9.8 acres) and a flat frequency multiplier of the 11 events corresponding to the 11 reporting years. This very low estimate is then subject to a net present value calculation that values the O&M costs at only $127,896. The Ecology oversight is then only 15% of that cost at $15,000 for the life of the project. This amount of money is insufficient for professional services for the review of even one report, yet that cost ($15,000) is meant to represent the cost of Ecology review of 11 reports.

In addition to the cost estimate severely underestimating the costs to monitor conditions, prepare reports, and review reports over the 11 envisioned events, the cost estimate also

[12] Ecology 2025. Guidance for Determining if a Cleanup Action uses Permanent Solutions to the Maximum Extent Practicable using Disproportionate Cost Analysis. Public Comment Draft. February 2025, Publication 25-09-059.

very much underestimates the number of monitoring events that will be necessary to ensure SL-3 remains protective of human health and the environment over the long term. That is, the cost estimate for SL-3 does not fully consider all of the post-construction elements in the list above.

Within the Interim Action Plan, Ecology states that long term monitoring to evaluate continued compliance of areas where contaminants will be left within caps will include "continued physical and chemical monitoring of soil or sediment at sampling frequencies sufficient to evaluate continued performance trends," and that "special monitoring could be undertaken after severe storms or other events that could potentially damage a cap." Confirmational monitoring is an essential part of cleanup implementation as prescribed in WAC 173-340-410. A set frequency of 11 monitoring, maintenance, and reporting events over a period of 30 years is not nearly adequate to meet the standards set forth within MTCA or within the Plan itself. And the scheduled events don't include additional contingency activities responsive to weather events.

As described above, the integrity of the engineered cap and the preservation of the institutional controls that protect the cap are the only factors employed in SL-3 to protect the environment and human and ecological receptors from the consolidated contaminated material over the long-term. The direct and percentage based indirect (project management and Ecology oversight) costs associated with a more realistic and protective O&M plan would increase the cost of SL-3 substantially.

Benefit Scoring

Benefits scoring within the DCA uses the following parameters and weights: protectiveness (30%); permanence (20%); long-term effectiveness (20%); management of short-term risks (10%); technical and administrative implementability (10%); and consideration of public concerns (10%). Alternative SL-5 received the highest total benefits score of 8.9 out of 10, followed by SL-3 with 7.8. While there is some degree of subjectivity that must be employed when assigning values such as these on a scale of 1 through 10, the assigned values overestimate the benefits of SL-3, placing it on a similar scale as SL-5, even though SL-5 is fully protective and allows the property to return to productive use while SL-3 does not.

Generally, SL-5 excels in parameters relating to protectiveness, permanence, and long-term effectiveness with SL-3 trailing closely, according to the DCA scoring. However, the supposed benefits for SL-3 are closely linked with the use of fencing and other institutional controls. And any future land re-use would have to undo the "remedy" constructed under SL-3.

One example of unrepresentative benefit scoring is seen in the technical and administrative implementability score. SL-3 requires extensive modeling and design to be technically implementable and requires institutional controls and environmental covenants to be administratively implementable. Yet, despite SL-3's technical and administrative challenges, the DCA over-scored SL-3 on this aspect (at a 9 out of 10), citing well-established construction methods for excavation and covers. Conversely SL-5, which is a simple dig and haul, was only scored a 6, even though its engineering and design is less intensive than that for SL-3 and even though it requires no administrative burdens. However, as discussed above, the technical implementability for SL-3 in terms of design, modeling requirements, and coordination with sediment investigation and remediation is lower than that of SL-5. The environmental covenant institutional control required for SL-3 should also lower its administrative implementability score. SL-3's technical and administrative implementability score should be lowered (from its current 9).

Further, Section 8.1.5 of *Guidance for Determining if a Cleanup Action uses Permanent Solutions to the Maximum Extent Practicable using Disproportionate Cost Analysis*[13] discusses the need to consider post-construction challenges when scoring technical and administrative implementability.

"The evaluator needs to consider not only the implementability of construction activities, but also post-construction activities, including:

- Operation and maintenance activities necessary to maintain the effectiveness of a constructed cleanup action component
- Replacement or repair of equipment (including labor, equipment, and materials).
- Waste management and disposal.
- Permit renewal.
- Compliance monitoring (including sampling and analysis).
- Maintaining institutional controls.
- Financial assurances.
- Periodic reviews.
- Postconstruction management and regulatory oversight."

For SL-3, the technical and administrative implementability score of 9 is too high because it does not account for these postconstruction considerations nor the engineering and

[13] Ecology 2025. Guidance for Determining if a Cleanup Action uses Permanent Solutions to the Maximum Extent Practicable using Disproportionate Cost Analysis. Public Comment Draft. February 2025, Publication 25-09-059.

modeling elements that have to be considered to appropriately design and build SL-3. Ecology should reconsider lowering the benefits score applied to SL-3 in light of the modeling and design work, property encumbrances, and postconstruction activities that will be required to implement SL-3.

CONCLUSION

As noted in Sections 9.3 and 9.4 of the *Guidance for Determining if a Cleanup Action uses Permanent Solutions to the Maximum Extent Practicable using Disproportionate Cost Analysis*[14], Ecology has discretion to use its best professional judgment to evaluate the uncertainty around and revise the cost estimates and benefits scores used in the DCA. An adjustment to these inputs is particularly relevant because they were developed several years ago for the 2019 *Interim Action Report Volume III: Alternatives Evaluation Report*.

Ecology should prepare a more careful consideration of all costs for SL-3, as well as its benefits reflective of the uncertainties, complexities, difficulty to implement, and lack of permanence in the absence of institutional controls. Ecology should also consider the incongruence of SL-3 with the City's Comprehensive Plan and factor in the hurdles that SL-3 places in front of future land redevelopment opportunities.

[14] Ecology 2025. Guidance for Determining if a Cleanup Action uses Permanent Solutions to the Maximum Extent Practicable using Disproportionate Cost Analysis. Public Comment Draft. February 2025, Publication 25-09-059.

Wheeler, Timothy on behalf of Voices for Health & Healing

Date: 8/5/25
Method: Website
Comment: See below.

The members of my organization, Voices for Health & Healing, are unanimous that Rayonier should be compelled to obey the law and remove ALL the toxic chemicals they deposited in Port Angeles Harbor. This corporation reaped tens of millions in profits from our labor, from our natural resources for more than 60 years, closing the mill abandoning our community in 1997. Despite a partial cleanup, EPA declared it a "Superfund" site with tons of heavy metals, petro-chemicals, dioxin, and polychlorinated biphenyls polluting our harbor due to Rayonier neglegiance. We reject any proposal for compromise on this issue. No Consent Decree short of a complete removal of these toxins paid for by Rayonier!

Wigger, Ann

Date: 8/9/25
Method: Email
Comment: See below.

To Ms. Abbett,

I am writing to support Level 5 cleanup of the former Rayonier Mill site in Port Angeles. It is the only option for such an environmentally sensitive area.

Thank you,

Ann Wigger
Port Angeles, WA

Wilder, Pamela

Date: 8/8/25
Method: Website
Comment: See below.

I attended the EPA presentation at Field Hall and it seems Option 3 is a done deal. You put your numbers through the hopper and out came the answer, which we now have to accept. If this is the case, 1) there is no point asking for public feedback and 2) the process is badly out of whack. Please reconsider Option 5, which protects the health of the human population and our environment as well. Yes, Rayonnier pays more-- but that's out of the money they made by polluting our ocean and soil for years. They broke it, they should fix it.

Williams, Bradley

Date: 8/11/25
Method: Website
Comment: See below.

I support the permanent solution of Alternative SL-5 for contaminated soil and sediment at the former Rayonier Mill site in Port Angeles, WA. Proposed Alternative SL-3, leaving contaminated soil in place forever in a capped mound which will greatly limit future development, is unacceptable.

Williams, Ken

Date: 8/9/25
Method: Website
Comment: See below.

Cleaning up a hazardous waste site does not mean cleaning only a portion. Do the job right, clean it up completely as in option 5. The Mill contaminated the entire site and should be required to clean the entire site even if taxpayer help is needed. Why risk long term continued contaminants in the soil.

Willits, Pat

Date: 8/12/25
Method: Website
Comment: See below.

I am writing as a long-time resident of Port Angeles who has been waiting for 28 years for Rayonier to clean up the toxic waste it left behind when it closed its mill on our waterfront. I have also been waiting all this time for the Department of Ecology to make them do it. Today I want to comment on the Draft Interim Action Plan.

SL-5 is the only solution to the problem. I can't think why anybody would believe that piling up all the contaminated soil and marine sediments 5 feet deep over 10 acres of shoreline and then putting ANY kind of a cap on it in that location is a serious solution to the problem. That doesn't take into consideration sea level rise, tsunami, perforation/degradation of the cap, or leaching of toxins into the underlying soil. All contaminants must be removed and carried off-site. This must include removal of some 4000 creosote-treated pilings.

Restoration of the Ennis Creek estuary through removal of the Rayonier mill pavement must be included as part of the cleanup. Without the previously-existing salt marsh where the freshwater of Ennis Creek meets the salt water of Port Angeles Harbor, the historic salmonid populations of the creek have no chance of recovery. It does not appear that the health of Ennis Creek was considered in the cost-benefit analysis that established the various options SL 1-5.

Thank you for listening. Please do the right thing. That is the mandate of the Washington Department of Ecology.

Wilson, Alex

Date: 7/30/25
Method: Website
Comment: See below and the following four pages.

Please see attachment for public comment.

From: Alex Wilson

7/28/2025

To: Washington State Department of Ecology

RE: Demand for Complete Cleanup and Restoration of the Rayonier Mill Site, Port Angeles

Dear Officials,

I am writing as a concerned resident regarding the ongoing remediation of the highly contaminated Rayonier Mill site at the mouth of Ennis Creek in Port Angeles, Washington. I am alarmed by recent proposals for a partial cleanup that fall drastically short of what is necessary to restore this crucial estuarine environment, protect public health, and safeguard our natural and cultural heritage. I urge all responsible agencies and stakeholders to require **full and complete cleanup and restoration** of the site, as was originally mandated by law and supported by numerous government reports.

Legal and Regulatory Basis for Complete Cleanup

Federal, state, and local agencies have, at various points, made it abundantly clear that only a comprehensive, science-driven cleanup of the Rayonier site is acceptable:

- **Washington Department of Ecology:** The site is subject to the state's Model Toxics Control Act (MTCA), which requires complete cleanup to protect human health and the environment. According to Ecology, "The goal of MTCA cleanups is to restore the site as close as possible to its original condition…" [WA Ecology, Rayonier Mill Site]
- **US Environmental Protection Agency (EPA, Region 10):** The Rayonier site has been evaluated under federal Superfund standards; EPA Region 10 has stated, "Restoration of the Ennis Creek estuary is necessary for the protection of endangered salmon and steelhead and for the health of the marine ecosystem." [EPA Rayonier Mill Site]
- **Port Angeles City Comprehensive Plan:** The City recognizes the site's restoration as critical to meeting obligations under the Clean Water Act and Endangered Species Act and for honoring tribal resource rights.[[Port Angeles Comp. Plan, 2016 Update, Sec. 4]]
- **Clallam County Comprehensive Plan:** Calls for "restoration of contaminated aquatic and shoreline environments to full biological health" particularly at industrial legacy sites such as Rayonier.[[Clallam County Comp. Plan, 2015, Natural Systems Element]]

Precedent and Rayonier's Cleanup Obligations Elsewhere

Rayonier has previously been required to conduct full and thorough cleanups at other former mill sites:

- **Fernandina Beach, Florida:** The EPA required removal of all visible tar deposits, chemical residues, and contaminated soil and groundwater. [EPA, Fernandina Beach Site Report, 2013]
- **Jesup, Georgia:** Cleanup activities included not only surface but subsurface and groundwater remediation, empirical monitoring, and restoration of wetlands impacted by the company's operations. [Georgia EPD, Rayonier Mill Cleanup Summary, 2016]

Given this precedent, there is no legal, moral, or scientific justification to allow Rayonier to walk back its obligations in Port Angeles. [1]

Washington State's Record of Mandating Thorough Cleanups

Washington's Model Toxics Control Act (MTCA) sets a high bar for site restoration, requiring that cleanups permanently protect human health and the environment. This law applies consistently across sites, whether in urban or rural settings—and numerous similar contaminated locations have seen full, permanent remedies imposed:

- **Port Gamble Bay Cleanup:** In Kitsap County, the Washington Department of Ecology and the Port Gamble S'Klallam Tribe required all contaminated mud, wood waste, and debris from the former Pope & Talbot mill to be removed. Nearly 110,000 cubic yards of sediment were excavated from the bay, restoring it for ecological and tribal use.
- **Bellingham Bay (Georgia Pacific Site):** The sprawling Bellingham mill was forced into complete soil, groundwater, and sediment cleanup, including removal of mercury-contaminated sediments, with a requirement for full environmental restoration[2].
- **Lower Duwamish Waterway (Seattle):** Although the scale is urban, the Department of Ecology and EPA mandated a comprehensive, phased cleanup of contaminated river sediments at multiple legacy industrial sites, emphasizing full removal or treatment where feasible[3].

These are but a few examples out of thousands of toxic site cleanups, many in less visible locations, showing the State does require full and permanent restoration to health and safety benchmarks[2].

Disparities in Rural vs. Urban Toxic Site Cleanups

A State review has highlighted administrative, financial, and equity gaps in how toxic cleanups are managed across Washington. Rural areas like Port Angeles, smaller towns, and tribal lands frequently face pronounced challenges compared to wealthier urban centers:

- **Administrative Capacity:** Rural communities typically have fewer staff and technical resources to advocate for, oversee, and sustain complex cleanups, as compared to major cities like Seattle or Tacoma, where environmental justice, real estate pressure, and stronger local government capacity drive more rigorous, visible cleanups[4].
- **Funding and Timeline Disparities:** The lengthy, underfunded Rayonier process—over 25 years so far—contrasts with more rapid action often seen at high-profile or urban sites where political and economic incentives are more concentrated[4].
- **Equity Impacts:** Studies reveal toxic sites disproportionately impact low-income, tribal, and rural communities, both in terms of site burden and in the slowness or partial nature of remediation, raising serious concerns of environmental injustice[5,6].

Ecological, Economic, and Cultural Imperatives for Full Cleanup

- **Salmonids and Wildlife:** The lower Ennis Creek estuary is a critical habitat for endangered salmon, steelhead, and other aquatic species.[[WDFW SalmonScape],[NMFS Biological Opinion, 2020]] Olympic National Park successfully protects the headwaters, but pollution at the estuary destroys downstream habitat, undermining investments in salmon recovery and **violating Tribal Treaty Rights**.
- **Culvert Removal and Restoration Investments:** Washington State and Clallam County have spent **millions** restoring fish passage through culvert remediation upstream. Without full cleanup and estuary restoration, these taxpayer investments are wasted, as fish cannot survive if the estuary remains toxic.[[WA State Fish Barrier Removal Board][Clallam County Public Works, 2022]]
- **Historic Village and Ennis Creek Mouth:** The Rayonier site overlies a pre-contact Lower Elwha Klallam village and fish camp, one of the last historically documented sites at the mouth of Ennis Creek. To allow its continued burial under poisoned sediment and pavement is a violation of our collective responsibility to history and to the Lower Elwha Klallam Tribe. [[WA State Historic Preservation Office, Site Inventory #CL-LVK-01]] The National Park Service has declared the restoration of this estuary as a top priority for regional cultural resources and salmonid recovery.[[NPS, Olympic National Park Resource Management Plan, 2018]]

Conclusion: Demand for Full Accountability

Partial cleanup is neither scientifically justified nor legally supportable. It is essential, for human and ecosystem health, for respect of Indigenous historical sites, and for honoring our considerable public investments in fish passage, that Rayonier be held to the highest standard of full cleanup and restoration.

I urge all relevant agencies to reject half-measures, enforce existing legal and regulatory requirements, and work transparently with the Lower Elwha Klallam Tribe and the local community to restore the Rayonier site to a standard that ensures lasting health, justice, and ecological integrity.

Sincerely,
Alex Wilson

Key Citations (for Reference):

1. WA Dept. of Ecology, Rayonier Mill Site Cleanup
2. EPA Region 10, Rayonier Port Angeles Site
3. City of Port Angeles Comprehensive Plan, 2016 Update
4. Clallam County Comp. Plan, Natural Resources
5. EPA, Fernandina Beach FL Cleanup
6. Georgia EPD, Rayonier Mill (Jesup)
7. WA SalmonScape Map
8. Lower Elwha Klallam Tribe, cultural resources
9. WA Fish Barrier Removal Board
10. NPS, Olympic National Park, Resource Management
11. WA Office of Archaeology & Historic Preservation

Footnotes:

1. https://ecology.wa.gov/spills-cleanup/contamination-cleanup/cleanup-sites/puget-sound/port-angeles-harbor/rayonier-mill
2. https://ecology.wa.gov/spills-cleanup/contamination-cleanup/cleanup-sites
3. https://www.epa.gov/superfund-redevelopment/superfund-sites-reuse-washington
4. https://apps.ecology.wa.gov/publications/documents/0909043.pdf
5. https://frontandcentered.org/wp-content/uploads/2017/01/MTCA-Report_1-25-17.pdf
6. https://www.theurbanist.org/2017/01/12/map-week-neighborhood-toxic/

Winn, Rebecca

Date: 8/7/25
Method: Website
Comment: See below.

Hello,

My name is Rebecca Winn and I am a resident of Port Angeles, Washington. I belong to a running group that uses the Discovery Trail along the waterfront on a weekly basis. I think about the contamination at Ryonier Mill often because of how frequently I run right by it. I attended the community forum on July 22nd with the Port Angeles City council where I learned about “option 3” and “option 5”

Please ensure that the toxic waste left by the Rayonier mill site is removed and disposed of as described in “option 5” .I would like future generations to be able to enjoy the Port Angeles waterfront without a toxic waste dump on site. Capping, or option 3, is not a solution, it is an insufficient band-aid that will leave my great grandchildren with the same waste and the same problem.

The financial figures used to estimate the costs of “option 3” and “option 5” should be reassessed by an independent entity, prior to economic costs being used as part of the decision making. The figures as they stand are flawed. Option 3 seems to be deflated in its costs, option 5 seems to be inflated.

I have lived in Port Angeles for six years but my roots are in Upstate New York where I lived for 30 years. We had a similar situation, but on a much larger scale. A company named General Electric (GE) dumped toxic waste into the Hudson River for years and communities along the Hudson were impacted by this pollution. The cleanup effort along the Hudson is still ongoing and the river and economy are still impacted by PCB's. One of the lessons I learned from this multi billion dollar project, is that if the decision making and the planning are in any way compromised by motivations other than achieving full restoration, such as primarily considering time and money saving measures, years down the line the cleanup effort will have underwhelming results and will waste both.

The little details will be important. Please don't allow corners to be cut in regards to cleaning up this site. Please learn from mistakes made in other projects. For instance, in the case of the Hudson, clamshell dredge buckets exacerbated cleanup efforts. Please use the right tools even if they cost a little more-it will be worth it in the end. The impact of the decision made today will be felt for generations to come. It is critical that the methods used in the cleanup effort are supported by the latest science and environmental engineering knowledge.

Do the right thing. Hold Rayonier accountable for fully restoring the damage done to our waterfront. Please dredge and remove contaminated sediment as explained in option 5.

Woods, Samuel

Date: 8/9/25
Method: Website
Comment: See below.

ITT operated their mill causing pollution in Port Angeles harbor at a profit for many years. They shut down this Mill and have spent the time since using various techniques to avoid cleaning up their mess. They even hired some Port Angeles good old boys at Harbor Works drag it it out and waste time, 20 years. It is time for ITT for clean up snd clean up now. I hope they do not bribe or bs your agency into more delay, they will undoubtedly try as there is a pattern of it with this company. They will try and "get to" someone, beware.KVT9

Wrubel, Katie

Date: 8/11/25
Method: Website
Comment: See below.

Subject: Please Choose Alternative SL5 for a Permanent Cleanup of the Rayonier Mill Site

Marian Abbett, Site Manager Washington Department of Ecology PO Box 47775 Olympia, WA 98504-7775

I am writing as a concerned citizen and a member of the Port Angeles community to express my strong support for Alternative SL5 for the cleanup of the former Rayonier mill site. This is a critical issue for the long-term health of our community and the unique marine habitat of our waterfront.

The Port Angeles waterfront is a vital resource and a home to critical species, including our endangered Southern Resident killer whales, salmon, and migratory birds. The contamination at the mill site, including PCBs, dioxin, and heavy metals, poses a significant and ongoing threat to this sensitive ecosystem.

Alternative SL3, which involves simply capping the site, is not a permanent solution. This temporary fix ignores the very real risks of sea-level rise, coastal erosion, earthquakes, tsunamis, and floods that could breach the cap and re-release pollutants into our waters.

A complete and permanent cleanup is long overdue. I urge you to select Alternative SL5, which involves the full removal of all contaminated soil. This is the only lasting solution that will truly protect our community and our environment for generations to come.

I believe the benefits of SL5 are vastly understated, and the costs of SL3 are not accurately estimated. The long-term health of our community is a benefit that cannot be measured in simple terms.

The Port Angeles waterfront has so much potential to better serve our community with a full cleanup of this site for recreational enjoyment for generations to come. I live and work along the waterfront and walking along the Discovery trail, it is really jarring to walk up to and long a chain link fence keeping people away from one private company's mess that they are trying to get out of cleaning up. It has already been several decades of nothing being done.

Please, for the sake of our community and our environment, choose Alternative SL5.

Sincerely,

Katie

Young, Mandy

Date: 8/12/25
Method: Website
Comment: See below.

The best plan of action is to move forward with a full cleanup of the mill site, including a complete removal of all contaminated materials and soil. The health of the environment and the surrounding community depends on the restoration of this area to a clean, uncontaminated state and is the bare minimum that should be considered for any restoration taken here. I support the Level 5 cleanup of the Rayonier Mill site

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Young, Raena

Date: 8/12/25
Method: Website
Comment: See below.

Port Angeles Rainer Mill Clean Up site. I feel the Rainer Mill site should be cleaned up properly not just capped. Between the drainage, and leakage into our harbor, as well as actually finally being able to develop the Rainer site is imperative to have a full clean up. As someone who has lived here my whole life, and waited a long time to see the land fully

cleaned safely to fully develop this prime real estate we need to think of the future of our town, a healthy habitat for wildlife and ecosystems, as well as the health of our future generations.

Zettel, Stephen

Date: 7/31/25
Method: Email
Comment: See below.

From: Stephen Zettel hakuchi9@icloud.com
Sent: Thursday, July 31, 2025 7:08 PM
To: Abbett, Marian L. (ECY) MABB461@ECY.WA.GOV
Cc: Sixkiller, Casey (ECY) csix461@ECY.WA.GOV
Subject: Comment to Ecology on the Rayonier Pulp Mill cleanup plan

I am submitting my comments on the Rayonier Pulp Mill Cleanup Plan.

The Cleanup Plan should include the following:

* Support the Port Angeles City Council decision - Option 5 Ecology must factor in to its cleanup cost analysis impacts to fish, wildlife, the environment and human health

* Support a full cleanup, not a coverup of soils and sediments. Remove all contaminated soils and sediments.

* Oppose leaving contaminated soils and sediment; then having to monitor them for 30 years.

* Support short- and long-term protection of the environment and public health; not a cheaper cleanup cost for Rayonier

* Remove all soils from the remaining concrete pad built hundreds of feet over the Harbor on fill that once held Rayonier's pulp mill

* Do not pile onto the concrete pad toxic sediments or wharf infrastructure; send these to appropriate hazardous waste landfills.

* Remove the concrete pad and restore the original shoreline now under the foundation

* As soon as possible relieve remove that dock pilings covered with creosote that is harmful to fish and other marine life.

* Ensure Ennis Creek is restored to its original shape and given space to continue the movement essential for a salmon stream

* Recreate the brackish water at the mouth of Ennis Creek for the salmon

* Support returning this area to its natural state to attract wildlife and connect it with the wildlife corridor to the east towards Sequim and Jefferson County.

* Oppose rebuilding on the site. Construction will face the same climate conditions as the mill infrastructure -- sea level rise, storm surges, tsunamis, earthquakes,

* Ensure the Natural Resource Damage Assessment parties complete their work for cleaning up and providing other restoration for federal resources contaminated by the Rayonier Pulp Mill. The decision makers are NOAA, USFWS, the Klallam Tribes and WA State Ecology

* Support solid and high fencing surround the upland polluted area along with large signs that fully inform the public of the cleanup and the importance of staying off the site.

* Keep the public updated as the cleanup moves forward.

Thank you,

Stephen Zettel
Sequim WA

Zey, John

Date: 7/29/25
Method: Website
Comment: See below.

This debacle has continued for over 2 decades by way of inefficient involvement by the Dept.of Ecology and the DNR. It will be another 2 decades minimally, and we shall all be dead from age without anyone in a responsible position ever taking notice or action or suffering any consequence of their malfeasance. It is just a nothing community being served by the hirelings of the oligarchs that administer complacency to the weak. Wildlife continues to dwindle and die off, the community can be poisoned, resources the community night have go astray. All the while the company that made millions, polluted, and its buyouts in government continue their theft of the public that makes it all possible. Unhappy, disgruntled - you bethcha!

Zhang, Polly

Date: 8/7/25
Method: Website
Comment: See below.

When I first visited Port Angeles in the spring of 2023, I had seen a short documentary film about Ennis Creek and hoped to see it with my own eyes. For the typical tourist, it is not easy to find any part of the creek. Since then, I have spent much more time in Port Angeles and have learned about how the creek used to provide a healthy environment for salmon to hatch and eventually return to lay their eggs. As a native of China, I have seen governments put more emphasis on economic development than on environmental protection. Usually, land that has been developed is impossible to restore. This is a rare chance to restore land, as much as possible, to what it once was. I support the Department of Ecology requiring the highest level of cleanup for this land.

Zimmerman, Kyle on behalf of 123 West Design Collective

Date: 8/7/25
Method: Website
Comment: See below.

On behalf of 123 West Design Collective, a Port Angeles-based engineering and design firm, I urge you to adopt Option SL 5, the full removal and off site disposal of all contaminated materials remaining at the former Rayonier Mill site.

The Interim Action Plan—and its capping strategy under Option SL 3—may appear cost effective, but it leaves toxins buried and accessible over time. The City Council's decisive vote in favor of SL 5 underscores the unacceptable nature of a permanent “cap,” which could betray the trust and safety of residents, visitors, and wildlife alike.

Option SL 5 offers the strongest long term outcomes. The analysis presented by The Peninsula Daily News demonstrates that SL 5 provides the highest benefit-to-cost ratio, even when adjusted for hidden expenses and complexity.

Thank you for prioritizing a cleanup that restores health, trust, and the natural wonder of Port Angeles.

Warm regards,

Kyle Zimmerman
123 West Design Collective

Zirinsky, Kenneth

Date: 7/30/25
Method: Website
Comment: See below.

Comment to the Washington State Department of Ecology

Attention: Marian Abbett

Dear Ms. Abbett,

I am writing to express my strong support for Alternative 5, the complete removal of contaminated soil and sediment at the former Rayonier pulp mill site in Port Angeles.

Alternative 5 is the most protective option for the environment and public health. By fully removing the contamination rather than capping it, we can ensure that future generations are not left to manage or bear the risks of industrial pollution. Partial measures may appear less costly in the short term, but they will inevitably carry long-term environmental and health costs that far outweigh initial savings.

It is vital that Ecology prioritize long-term impacts over immediate costs. Protecting our environment, our fisheries, and our communities demands a comprehensive cleanup. In particular, I urge Ecology to safeguard fishing rights, salmon habitat, and marine ecosystems, which are integral not only to local tribal and community life but also to the broader ecological health of Washington State.

I ask that Ecology reject capping as a primary solution wherever possible. Capping only delays and transfers the burden of contamination management to future generations, rather than resolving the problem now.

Please also commit to the restoration of Ennis Creek and natural shorelines, which will help recover critical habitat for salmon and improve ecological resilience in the region.

Finally, I encourage Ecology to remember that the decisions made in Port Angeles will set precedents for other areas in Washington, including Tacoma. Strong, protective action here will strengthen trust in future cleanup efforts statewide.

Thank you for your leadership and for considering these points as you move forward with this crucial decision.

Anonymous, D

Date: 8/12/25
Method: Website
Comment: See below.

ITT Rayonier enjoyed decades of profitable operation at the Port Angeles site that unfortunately resulted in significant toxic contamination and an ongoing threat to human health and the marine and terrestrial environment. Anything less than a full SL5 clean-up of the site falls short of the legal and moral responsibility the company has to the city of Port Angeles, the Lower Elwha Clallam tribe, and the broader region.

By the Department of Ecology's own admission, the engineering and operational cost of the incomplete SL3 alternative of mounding and capping contamination in place cannot be known at this time due to the unique challenges of the site and the unknowns of the solution. What can be know with certainty, however, is that leaving toxic materials in place at the site simply delays the time when the toxic materials will again threaten human health and the broader environment. No engineering solution is ever perfect nor impervious to the passage of time, particularly in a seismically active location adjacent to a large body of water and in the outflow of a stream in an area of sometimes extreme precipitation. Leaving contaminants in place merely leaves an ultimate reckoning to future generations ever further removed from creating the problem in the first place.

A full cleanup of the site is required for the former industrial site to ever realize its full potential. I strongly urge the Department of Ecology to require an SL5 site cleanup.

Anonymous, Jim

Date: 8/11/25
Method: Website
Comment: See below.

I am in full agreement with the City of Port Angeles that Rainier should clean up the toxic waste they created fully. It's hard for me to contain my anger and disappointment that we have continued to allow corporations to contaminate so much of our environment nationwide. It's long past due we prevent this from happening in the future, and hold those accountable to clean up their contamination to the point the property was before they desecrated it. There is no telling what damage has been done to people, the ecosystem and all the organisms within. It's absolutely ludicrous that this has been allowed to continue for 60 years. Chemical, toxic contamination is potentially going to be the ruination of our planet if we don't get serious about controlling corporations and the chemical industry.

Anonymous, Justin

Date: 8/11/25
Method: Website
Comment: See below.

I strongly support the permanent cleanup solution of Alternative SL-5 for contaminated soil and sediment at the former Rayonier Mill site in Port Angeles, WA.

The proposed Alternative SL-3—leaving a 10-acre, 7-foot-tall mound of capped toxic soil in place indefinitely—would severely limit future development, contradict the City's Comprehensive Plan, and leave our community with a fenced-off hazardous waste site in perpetuity.

For nearly three decades, the community has waited for a real solution. Leaving behind soil contaminated with dioxins, PCBs, metals, diesel, and oils is not acceptable. Ecology must remove the contamination entirely so the property can be safely redeveloped for the future.

Anonymous, K

Date: 8/12/25
Method: Website
Comment: See below.

As a long-time resident of Port Angeles, I am writing to strongly urge the DOE to choose alternative SL5 in the clean up of the old Rayonier Mill site at the mouth of Ennis Creek along the Port Angeles shoreline. Complete removal of the 4,000 creosote-treated pilings and the contaminated materials along with the restoration of the estuary that existed before the creek was narrowed and straightened to accommodate the mill development is the only reasonable solution.

Beginning with the DOE Public Meeting and Open House a wave of consensus has moved through all sectors of this community. During the City Council meeting a couple of weeks later it continued to grow with a unanimous vote by the council and so many community voices have continued to join in. It has become clear that the costs for SL3 (capping the problem) have been underestimated and the benefits have been overestimated. Only a permanent solution that removes contaminated materials away from this sensitive ecological site to an appropriate off-site landfill will allow full restoration. Implementation of SL5 will once again honor and celebrate the cultural significance and long term ecological health of this site for generations to come.

Thank you.

Anonymous, Kaye

Date: 8/12/25
Method: Website
Comment: See below.

Port Angeles Rayonier Mill Clean up 2025

I have been a resident here in Port Angeles for 9 years. This area has been an area of contention for many years and needs to be dealt with correctly. I support the SL5 cleanup option for our beautiful waterfront. Please see slides from Nicole Ott in the documents.

As she states keeping the material onsite according to the SL3 version is not a long term solution. It is also much more complicated and expensive over time than removing the material which if left on the land will be a blight to the area and have potential long term continued contamination. The material needs to be removed by the company that left it there. So that it can be restored and Ennis creek will not be in danger of more contamination. Leaving 10 acres of contaminated material (even if it is “monitored”) forever is a terrible option and shouldn't even be an option!

Thank you for your consideration

Anonymous, Shelly

Date: 8/10/25
Method: Email
Comment: See below.

I support the permanent solution of Alternative SL-5 for contaminated soil and sediment at the former Rayonier Mill site in Port Angeles, WA. Proposed Alternative SL-3, leaving contaminated soil in place forever in a capped mound which will greatly limit future development, is unacceptable.

Anonymous, Tracy

Date: 8/12/25
Method: Website
Comment: See below.

I live near the mill site and when I access the Discovery Trail off Ennis Street, the very first thing I see is a chain link fence between me and the strait. When I start my run to the east, there's a chain link fence between me and the shoreline for quite some way, and my mind always goes to the birds and sea creatures and wildlife that continue to be exposed to

contamination over these many years. That fencing and the entire site are bleak and unnecessarily ugly sights, and I always breathe more freely once past that long stretch of contaminated land. It boggles the mind that the Department of Ecology isn't pushing for Alternative SL-5: a full and permanent clean-up of the contaminated soil. It isn't as if the taxpayers would foot the bill for a full and permanent clean-up since it's Rayonier Mill's responsibility to clean up their industrial waste. How are we even debating this issue? How can you possibly believe that residents and visitors would prefer a capped mound of toxic soil behind a chain link fence to an unobstructed view of clean/safe land and water? PLEASE, listen to the citizens advocating for the collective health and well-being of people and planet! Choose Alternative SL-5!

Anonymous, Anonymous

Date: 7/24/25
Method: Website
Comment: See below.

I would like to have a survey done on how many people from the time the mill open and closed had cancer. My family was raised down like 4 blocks from the mill. I can walk for a mile or more and name off people door to door that had cancer. In my family, my Father, Mother and Brother all had cancer. The neighbors also. The mail man even had it that lived down the street! Then going over by the Swains area, I can do the same thing. Has anyone ever brought this subject up before? I am scared that them moving all this material will stir things up possibly? I mean, as a child we had time when we had to stay inside because they were releasing things at the mill and paint was actually peeling off our houses. Someone needs to be held responsible for peoples lives.

Anonymous, Anonymous

Date: 7/24/25
Method: Website
Comment: See below.

The clean up of the Rayonier Mill site needs to be the SL5 version and the contaminated soil removed and taken to a site where they can handle it better. It is the only way to restore the waterfront and bring back (hopefully) sea life in that area. Would also be wonderful for the public to be able to utilize the area.

Anonymous, Anonymous

Date: 7/24/25
Method: Website
Comment: See below.

Unacceptable. Clean up every bit of it.

Anonymous, Anonymous

Date: 8/7/25
Method: Website
Comment: See below.

Thank you for the opportunity to comment. I feel it is important to hold corporations accountable for contamination from previous and current operations. My expectations are that WADOE restore as much of the affected site to unrestricted use levels as possible. Consolidation and capping while well suited for some areas is concerning this close to the Strait of Juan de Fuca and the greater sound. I would prefer as much of the contaminated soil as practicable removed to a more stable and less sensitive area for long term disposition. It's important for the future of Clallam County and Port Angeles to have this high value piece of property useable for whatever future projects my come. That means restoring as much of the area to as clean of a standard as possible. By the 1990's we knew the the hazards of many of the chemicals found on site. We need to hold Rayonier accountable. Thank you for your time.

Anonymous, Anonymous

Date: 8/8/25
Method: Website
Comment: See below.

After reviewing the options it is clear that option 5 is the best way to proceed. While the financial cost may be higher than others, the living cost of other options is higher. The burden of responsibility has been placed on the here and now to best care for the future of our waterways and the health of our communities. Please ensure that our community is protected from further toxicity.

Anonymous, Anonymous

Date: 8/8/25
Method: Website
Comment: See below.

I want complete and thorough clean up of the site. All contaminated materials not just toxic. We live near the site. I don't want to have any issues with this ever in the future. Thank you.

Anonymous, Anonymous

Date: 8/9/25
Method: Website
Comment: See below.

Rayonier needs to take complete responsibility for a full and permanent clean up of their superfund site on the Port Angeles waterfront. Option 5, FULL CLEAN UP is the only option that is fiscally responsible, culturally respectful and appropriate for this LONG OVERDUE response to their pollution.

Capping and covering this up (option 3)is unacceptable.

Anonymous, Anonymous

Date: 8/9/25
Method: Website
Comment: See below.

It is critical for the site to be cleaned up to Level Five for these reasons: cleaning up the toxins will be more expensive in the future and more prohibitive; the harbor is in the tsunami zone and susceptible for consequences should an earthquake occur in the " Pacific ring of fire," which includes our town, and toxin dispersion at any level in our water has an impact on health.

Anonymous, Anonymous

Date: 8/9/25
Method: Website
Comment: See below.

Are you people kidding me??

We've been waiting HOW LONG??

If this were a Seattle site, or an Olympia site, would you still even be only DISCUSSING this?!

What is wrong with you? What is wrong with our system? How could anything take SO MANY years to figure out, make a decision, and GET IT DONE?!

IF Rayonier is in the wrong, if Rayonier is culpable, then make them get it fixed/done NOW. Not in 2 years. Not in 5 years.

Now.

TIME'S UP.

WTF?

Anonymous, Anonymous

Date: 8/10/25
Method: Website
Comment: See below.

Hello, I am a concerned member of Greater Clallam County and frequently recreate with my family and children at the Port Angeles Waterfront, rivers, watersheds and Discovery Trail areas.

Leaving contamination in place under a cap, as proposed in Alternative SL-3, is not an acceptable long-term solution for our waterfront. While capping may reduce short-term exposure, it does not remove the toxic materials from our community, and it places a permanent burden of monitoring, maintenance, and land-use restrictions on future generations.

SL-5 is the only option that truly protects public health, the environment, and the future of Port

Angeles. By excavating and removing all contaminated soil for proper disposal in a licensed facility, SL-5 eliminates the risk of future leaching into Port Angeles Harbor, prevents cap failure or storm damage from re-exposing toxins, and ensures that our waterfront can be safely redeveloped for housing, parks, and businesses.

This site has been contaminated for decades, and our community has waited long enough for a

permanent solution. Anything short of complete cleanup will leave us with a toxic legacy and limit

the economic and recreational potential of this unique waterfront location.

I urge the Department of Ecology to listen to the City of Port Angeles, local leaders, and residents

by choosing SL-5—not as an interim measure, but as the final, comprehensive cleanup our

community deserves.

Thank you for your consideration.

Moxie Quinn
Area Resident & Concerned Community Member

Anonymous, Anonymous

Date: 8/11/25
Method: Website
Comment: See below.

Option 3 is not enough. A complete clean up is needed of the space. Capping it is a band aid that will only cover a tiny portion of the wound. Take responsibility for your work and clean up the mess ou made.

Anonymous, Anonymous

Date: 8/11/25
Method: Website
Comment: See below.

Please do a full and permanent cleanup of the Rayonier Mill site. Throwing gravel over it is not sufficient, nor should that be an option as it does not solve the issue. Thank you.

Anonymous, Anonymous

Date: 8/11/25
Method: Website
Comment: See below.

Please perform a complete and permanent clean up of the Rayonier Mill. We need our homeland to be as safe and clean as possible for the generations to come and for our non-human brethren. Thank you for taking this matter seriously.

Anonymous, Anonymous

Date: 8/11/25
Method: Website
Comment: See below.

Subject: Please Choose Alternative SL5 for a Permanent Cleanup of the Rayonier Mill Site

Marian Abbett, Site Manager Washington Department of Ecology PO Box 47775 Olympia, WA 98504-7775

I am writing as a concerned citizen and a member of the Port Angeles community to express my strong support for Alternative SL5 for the cleanup of the former Rayonier mill site. This is a critical issue for the long-term health of our community and the unique marine habitat of our waterfront.

The Port Angeles waterfront is a vital resource and a home to critical species, including our endangered Southern Resident killer whales, salmon, and migratory birds. The contamination at the mill site, including PCBs, dioxin, and heavy metals, poses a significant and ongoing threat to this sensitive ecosystem.

Alternative SL3, which involves simply capping the site, is not a permanent solution. This temporary fix ignores the very real risks of sea-level rise, coastal erosion, earthquakes, and floods that could breach the cap and re-release pollutants into our waters.

A complete and permanent cleanup is long overdue. I urge you to select Alternative SL5, which involves the full removal of all contaminated soil. This is the only lasting solution that will truly protect our community and our environment for generations to come.

I believe the benefits of SL5 are vastly understated, and the costs of SL3 are not accurately estimated. The long-term health of our community is a benefit that cannot be measured in simple terms.

Please, for the sake of our community and our environment, choose Alternative SL5.

Sincerely,

Nellie Bridge

Anonymous, Anonymous

Date: 8/11/25
Method: Website
Comment: See below.

I've lived in Port Angeles for almost 50 years and waited many years to see this toxic site cleaned up. For the health and safety of every living thing (on land, sea, air), total removal of contamination is the ONLY reasonable option. Capping is unacceptable, as is partial cleaning of heavily contaminated areas to make those areas appear less toxic. How can Ecology even consider this.

I doubt I'll be around to witness this, but hope my other 3 generations (all of whom live here) can benefit from having TOTAL REMOVAL of all contamination.

Anonymous, Anonymous

Date: 8/11/25
Method: Email
Comment: See below.

I support the permanent solution of Alternative SL-5 for contaminated soil and sediment at the former Rayonier Mill site in Port Angeles, WA.

Proposed Alternative SL-3, leaving contaminated soil in place forever in a capped mound is unacceptable. This would present a long term risk of future contamination from natural disasters and would greatly limit development opportunities that our town desperately needs. Port Angeles does not need to be stuck with a toxic waste dump. Rayonier is a profitable company. They can fully clean up their mess.

Anonymous, Anonymous

Date: 8/11/25
Method: Website
Comment: See below.

I support a full cleanup of the property so that the fences can come down and the land can be put back in use -- especially for a park. The fact that Rayonnier has not taken care of this all these years is inexcusable. Ownership of the property surely does not give the right to load it up with toxic waste. I fervently hope that the Dept of Ecology will not acquiesce in a process that will not restore full usability to the land and waters in question.

Anonymous, Anonymous

Date: 8/12/25
Method: Website
Comment: See below.

The residents of Port Angeles will not accept any other alternatives than SL-5. Soil remediation is the basis for which the city will be able to use the prime land for a park, housing, commercial development, or any other type of development that will help the city recover from the economic and ecological scars these companies have left on our city. Notably, the Gale's Addition neighborhood has also born the brunt of sulfate contamination and is not a part of this agreement. Why are you letting citizens fend for themselves? The Gale's Addition neighborhood has a higher concentration of low income people and other marginalized communities, why isn't Rayonier held accountable for the destruction they've caused to these communities?

Page 43 and 44 of the Rayonier Mill Interim Action Plan are a slap in the face to the citizens of Washington State. Why are we considering remediation in terms of a cost benefit analysis that doesn't consider the long term costs incurred by the general public? We (the public) don't care about the costs of remediation incurred by Rayonier, they were allowed to profit off our environment and people for all this time. Why are the costs to the people not weighed in this analysis? I don't care if remediation bankrupts Rayonier, in fact I would preffer it. At the end of the day, the State and City are complicit in allowing this development in the first place, we should bare some of the responsibility for cleaning it as well. I would preffer this remediation bankrupts Rayonier, and Ecology continues with XXII (2) of the Consent Decree and files a lein and eventually repossess the property from Rayonier. I don't care if WA needs to spend more money on this remediation, I am happy to see my tax dollars go to this effort as long as Rayonier sees some sort of consequence like losing their land and ability to do buisiness in this state.

I want to see a former mill site that can support human habitation as soon as possible. I do not care about the costs incurred by the state or Rayonier, stop centering the costs of this remediation as the factor for which you make your decisions.

Anonymous, Anonymous

Date: 8/12/25
Method: Website
Comment: See below.

Washington residents (humans, animals, and plants) deserve a full and permanent cleanup of the Port Angeles Rayonier Mill Site. It is crucial to restore the health of our oceans.

Thank you!

Anonymous, Anonymous

Date: 8/12/25
Method: Website
Comment: See below.

It is crucial to provide a full and complete cleanup of the Rayonier Mill site in the Port Angeles harbor, not just a gravel cover up.

The health of our oceans is paramount and should not be compromised to cut costs.

Anonymous, Anonymous

Date: 8/12/25
Method: Website
Comment: See below.

I agree with PA City Council, Clallam County Commissioners and PABA in wanting a complete (level 5) cleanup of the Rayonier site.

As a new resident of Port Angeles I have been saddened to learn about the environmental state of the waterfront. We moved here to enjoy the clean cool air, and the natural beauty of the mountains and sea. I am encouraged by this effort of the community to do something about the mess that was made, by this plant and others, before the consequences were fully understood.

Anonymous, Anonymous

Date: 8/12/25
Method: Website
Comment: See below.

As a permanent resident of Port Angeles, and a downtown small business operator with an educational background in pollution remediation and environmental stewardship, I find the plan supported by Rayonier (referred to as SL-3) to be a slap in the face to the citizenry of this great community. Anything less than a total and permanent remediation of the damage done by Rayonier is unacceptable.

Furthermore, as our population has been growing by leaps and bounds, I shudder to think of the precedent this sets for future cleanup sites by industrial operations who choose to make Port Angeles their home as well. Rayonier had a welcoming home here for over 60 years. It is shameful to think that a cap placed over contamination they caused over generations would suffice as a solution.

I stand with the city council in favor of SL-5 and applaud the members for standing up for our best interests.

Appendix C:

Port Angeles Rayonier Mill - 2026 Re-Evaluation of Disproportionate Cost Analysis for Soil Alternatives

Port Angeles Rayonier Mill Site
Permanent to the Maximum Extent Practicable (PMEP)
Re-Evaluation of Disproportionate Cost Analysis for Soil Alternatives

To: Port Angeles Rayonier Mill Site File

From: Marian L. Abbett, P.E.
Section Manager
Southwest Region Office
Toxics Cleanup Program

Date: June 2026

1.0 Purpose

Under the Model Toxics Control Act (MTCA), the state's environmental cleanup law enacted by the Legislature, cleanups of contaminated sites must not only be protective, but also "use permanent solutions to the maximum extent practicable" (RCW 70A.305.030(1)(b)). To select the remedy which is "permanent to the maximum extent practicable" (PMEP), we review a disproportionate cost analysis (DCA). The DCA compares the costs and benefits of different cleanup remedies.

In 2024, Ecology's revisions to the MTCA Cleanup Rule, Chapter 173-340 WAC[1], went into effect, and, in 2025, Ecology published new guidance for conducting a PMEP evaluation, Guidance for Making Cleanups Permanent to the Maximum Extent Practicable (PMEP).[2] (To learn more about permanent and non-permanent cleanups, visit Ecology's Evaluating cleanup options webpage[3] or download the focus sheet Making cleanups as permanent as practicable.[4])

In 2019, under Agreed Order No. DE 6815, Rayonier A.M. Properties LLC (RAMP) completed the public review drafts of the first three volumes of an Interim Action Report which are the Remedial Investigation and Feasibility Study for the Port Angeles Rayonier Mill Study Area. These reports were finalized in 2021 after a round of public comment. The Volume III report is the feasibility study and includes the DCA.

[1] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340
[2] https://apps.ecology.wa.gov/publications/summarypages/2509059.html
[3] https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/contamination-cleanup-tools/evaluating-cleanup-options
[4] https://apps.ecology.wa.gov/publications/summarypages/2509058.html

During the 2025 public comment on the draft Interim Action Plan (IAP), many commenters requested a re-evaluation of the DCA using Ecology's 2025 guidance. This memo summarizes the re-evaluation, specifically for the soil alternatives.

2.0 Summary of Volume III DCA

RAMP produced the Interim Action Report Volume III (Volume III) to meet the requirements of the 2017 version of the MTCA regulations that were in effect at that time. Volume III developed and evaluated remedial alternatives for the Study Area, including both the upland and marine environments, to enable interim actions to be selected for the upland and marine portions of the Study Area. Section 6 of Volume III presents the DCAs for the soil, groundwater, and sediment remediation alternatives.

MTCA (2017) required that the DCA specified in WAC 173-340-360(3)(e) be used to ensure that permanent solutions are used to the maximum extent practicable (WAC 173-340-360(3)(b)). In the DCA, costs are considered to be disproportionate to benefits "if the incremental costs of the alternative over that of a lower cost alternative exceed the incremental degree of benefits achieved by the alternative over that of the other lower cost alternative" (WAC 173-340-360(3)(e)(i)).

To perform the DCA, the overall benefits score for a particular alternative is combined with the alternative's estimated present-value cost to calculate a benefit-to-cost ratio. The benefit-to-cost ratios for all of the alternatives are then compared to determine whether any alternatives have costs that are disproportionate to benefits.

Each alternative is scored for the following benefits criteria:

- Protectiveness
- Permanence
- Long-term effectiveness
- Short-term risks
- Implementability
- Public concern

In Volume III, a weighting factor was applied to the benefits criteria reflecting the relative importance of each benefit. The weighting factors used are consistent with other cleanup sites. Each alternative was costed in 2019 present costs.

The soil alternatives compared in Volume III:

SL1 – Cover in Place All Soil Above Unrestricted Use Cleanup Levels

SL2 – Consolidate and Cover All Soil Above Remediation Levels

SL3 – Consolidate and Cover All Soil Above Unrestricted Use Cleanup Levels

SL4 – Excavate and Dispose Offsite All Soil Above Remediation Levels

SL5 – Excavate and Dispose Offsite All Soil Above Unrestricted Use Cleanup Levels

Table 1. Volume III – Upland Soil Remediation Alternatives

		SL1	SL2	SL3	SL4	SL5
Cost ($ in millions)		11.00	7.40	10.00	28.00	37.00
DCA Benefit Criteria	Weight (%)					
Protectiveness	30%	8.0	6.0	9.0	7.0	10.0
Permanence	20%	5.0	6.0	7.0	8.0	9.0
Long-term effectiveness	20%	6.0	7.0	8.0	8.0	10.0
Short-term risks	10%	9.0	8.0	7.0	6.0	5.0
Implementability	10%	9.0	9.0	9.0	6.0	6.0
Public concerns	10%	4.0	1.0	5.0	1.0	10.0
Total weighted degrees of benefit	100%	**6.8**	**6.2**	**7.8**	**6.6**	**8.9**
Cost Effectiveness (B/$)		6.2	8.4	7.8	2.4	2.4

Two alternatives, SL2 and SL4, required engineering action when soil contamination was above a remediation level (e.g., 40 ppm) rather than when soil contamination was above the unrestricted land use cleanup level (e.g., 10 ppm). This effectively meant a smaller footprint would have an engineering action, and a larger footprint would require institutional controls.

MTCA requires that the cleanup action "shall not rely primarily on institutional controls and monitoring where it is technically possible to implement a more permanent cleanup action for all or a portion of the site." It is technically possible to use an engineering control for the contaminated soil exceeding unrestricted land use cleanup levels. Therefore, in developing the 2025 IAP from Volume III, Ecology dropped alternatives SL2 and SL4 from further consideration in the DCA. This is reflected in Table 1 above with the red dot format.

In comparing Alternatives SL1, SL3, and SL5, SL3 has the highest benefit to cost ratio and is the PMEP alternative. Based on the results of the DCA, the selected soil remediation alternative is Alternative SL3 as presented in the draft IAP.

3.0 Using 2025 PMEP Guidance

The approach for conducting a PMEP evaluation under the 2025 guidance still involves a DCA and is very similar to the evaluation done for the DCA in Volume III.

A relevant change under the 2025 guidance and in the 2024 MTCA rule revision is that Public Concern criterion is no longer a defined benefit. Instead, Public Concern is now incorporated into the scoring and weighting of benefits.

- **MTCA criteria before 2024**
  - Threshold Criteria
    - Protect human health and the environment
    - Comply with cleanup standards
    - Comply with other laws
    - Provide for compliance monitoring
    - Reasonable restoration time frame
  - DCA Ranking Criteria
    - Protectiveness
    - Permanence
    - Long term effectiveness
    - Short term risks
    - Implementable
    - Public Concern
  - Cost

- **MTCA criteria 2024**
  - Threshold Criteria
    - Protect human health and the environment
    - Comply with cleanup standards
    - Comply with other laws
    - Provide for compliance monitoring
    - Reasonable restoration time frame
  - DCA Ranking Criteria
    - Protectiveness
    - Permanence
    - Long term effectiveness
    - Short term risks
    - Implementable
  - Cost

In addition, under the 2025 Guidance, the alternatives are compared in a stepwise fashion of most permanent to the next most permanent. **The alternative with the lowest cost to benefit ratio is selected.** As part of the 2025 Guidance, Ecology developed a spreadsheet tool to help in performing this evaluation.

A very large number of public comments were submitted on the draft IAP, and a significant majority of these have identified the relative importance of Permanence, Protectiveness, and Long-term effectiveness with a particular emphasis on Permanence. Because Public Concern is no longer a benefit criterion, its weight (10%) was applied to the Permanence criterion. The Permanence criterion weight was 20% in the Volume III DCA, and is now set at 30%. All other benefit scores and costs are the same as used in Volume III.

Table 2. 2025 PMEP tool – using Volume III costs and benefit scores

		SL1	SL3	SL5
Cost ($ in millions)		11	10	37
DCA Benefit Criteria	Weight (%)			
Protectiveness	30%	8.0	9.0	10.0
Permanence	30%	5.0	7.0	9.0
Long-term effectiveness	20%	6.0	8.0	10.0
Short-term risks	10%	9.0	7.0	5.0
Implementability	10%	9.0	9.0	6.0
Total weighted degrees of benefit	100%	6.90	8.00	8.80
Cost Effectiveness ($/B)		1.59	$1.25	$4.20

Alternative SL3 has the lowest cost to benefit ratio, and SL3 is therefore the PMEP alternative – a result consistent with Ecology's draft IAP.

4.0 City and Integral comments

In an August 7, 2025 letter, the City of Port Angeles and their consultant, Integral, provided comments on Ecology's draft IAP.

The comments assert that the SL3 cost estimate is almost certainly too low.

> "It does not account for additional contaminated material that may be found and removed from the shoreline. It also fails to account for the complexity of design, engineering, operation, and long-term maintenance for SL3. And the estimated costs for long-term monitoring and maintenance are unrealistically low and do not meet regulatory standards for ensuring long-term protectiveness."

The comments also assert that the SL5 costs are likely overestimated.

> "In particular, indirect costs for SL5 are likely overestimated, as the calculation method is not representative of how straightforward excavation and off-site disposal is as a remedy."

In addition, the comments assert that the benefit scoring for SL3 is likely inflated, particularly regarding technical and administrative implementability, while SL5's straightforward approach is undervalued. It was suggested that SL3's implementability score should be lowered from its current score of 9.

The comments from the city and Integral did not attempt to conduct a DCA to illustrate how their preferred Alternative SL5 could actually turn out to be the PMEP alternative. As an exercise, to test Integral's comments, Ecology has made the following adjustments (highlighted in blue in the table):

- SL3 – increased cost from $10M to $15M
- SL3 – reduced Implementability benefit score from 9 to 5
- SL5 – reduced cost from $37M to $35M
- SL5 – increased Implementability benefit score from 6 to 10

Note: these adjustments were made to reflect the comments and are not necessarily supported by a re-evaluation of costs or benefits. It is an exercise to see how the adjustments would impact the identification of the PMEP alternative using the 2025 PMEP tool. In addition, SL1 is not carried forward in the comparisons as it is the least permanent of the three alternatives.

Table 3. 2025 PMEP tool – Integral comments

		SL3	SL5
Cost ($ in millions)		15.00	35.00
DCA Benefit Criteria	Weight (%)		
Protectiveness	30%	9.0	10.0
Permanence	30%	7.0	9.0
Long-term effectiveness	20%	8.0	10.0
Short-term risks	10%	7.0	5.0
Implementability	10%	5.0	10.0
Total weighted degrees of benefit	100%	7.60	9.20
Cost Effectiveness ($/B)		$1.97	$3.80

Alternative SL3 still has the lowest cost to benefit ratio and is the PMEP alternative.

5.0 Sensitivity Analysis

As part of a sensitivity analysis, Ecology ran more scenarios to determine the extent to which the costs and benefit scoring for Alternatives SL3 and SL5 would have to be manipulated in order for Alternative SL5 to become the PMEP alternative.

A. First – Ecology made further adjustments on benefits. Lowered benefits scores for SL3, and increased benefits scores for SL5 (shown as darker blue). This is just a sensitivity analysis and not necessarily a realistic evaluation of benefits.

Table 4. 2025 PMEP tool – further adjustments on benefits

		SL3	SL5
Cost ($ in millions)		15.00	35.00
DCA Benefit Criteria	Weight (%)		
Protectiveness	30%	7.0	10.0
Permanence	30%	5.0	10.0
Long-term effectiveness	20%	6.0	10.0
Short-term risks	10%	5.0	6.0
Implementability	10%	5.0	10.0
Total weighted degrees of benefit	100%	5.80	9.60
Cost Effectiveness ($/B)		$2.59	$3.65

Alternative SL3 still has the lowest cost to benefit ratio and is the PMEP alternative.

B. Next – Ecology made further adjustments to the costs. Increased the cost of SL3 to $18M from an original cost of $10M (which is not supported) and decreased the cost of SL5 to $30M from an original cost of $37M (which is not supported).

Table 5. 2025 PMEP tool – further adjustments to costs

		SL3	SL5
Cost ($ in millions)		18.00	30.00
DCA Benefit Criteria	Weight (%)		
Protectiveness	30%	7.0	10.0
Permanence	30%	5.0	10.0
Long-term effectiveness	20%	6.0	10.0
Short-term risks	10%	5.0	6.0
Implementability	10%	5.0	10.0
Total weighted degrees of benefit	100%	5.80	9.60
Cost Effectiveness ($/B)		$3.10	$3.13

Alternative SL3 still has the lowest cost to benefit ratio and is the PMEP alternative.

C. Finally, after adjusting the cost of SL3 to $19M, the spreadsheet tool selects SL5 as the PMEP alternative.

Table 6. 2025 PMEP tool – final adjustment to cost, SL5 is now PMEP

		SL3	SL5
Cost ($ in millions)		19.00	30.00
DCA Benefit Criteria	Weight (%)		
Protectiveness	30%	7.0	10.0
Permanence	30%	5.0	10.0
Long-term effectiveness	20%	6.0	10.0
Short-term risks	10%	5.0	6.0
Implementability	10%	5.0	10.0
Total weighted degrees of benefit	100%	5.80	9.60
Cost Effectiveness ($/B)		$3.28	$3.13

Alternative SL5 has the lowest cost to benefit ratio and is the PMEP alternative.

Table 7. For ease of comparison, this table shows all the runs side by side.

		Volume III		Integral Comments		More benefit adjustments		More cost adjustments		Change needed to get to SL5	
		SL3	SL5	SL3	SL5	SL3	SL5	SL3	SL5	SL3	SL5
Cost ($ in millions)		10.00	37.00	15.00	35.00	15.00	35.00	18.00	30.00	19.00	30.00
DCA Benefit Criteria	Weight (%)										
Protectiveness	30%	9.0	10.0	9.0	10.0	7.0	10.0	7.0	10.0	7.0	10.0
Permanence	30%	7.0	9.0	7.0	9.0	5.0	10.0	5.0	10.0	5.0	10.0
Long-term effectiveness	20%	8.0	10.0	8.0	10.0	6.0	10.0	6.0	10.0	6.0	10.0
Short-term risks	10%	7.0	5.0	7.0	5.0	5.0	6.0	5.0	6.0	5.0	6.0
Implementability	10%	9.0	6.0	5.0	10.0	5.0	10.0	5.0	10.0	5.0	10.0
Total weighted degrees of benefit	100%	8.00	8.80	7.60	9.20	5.80	9.60	5.80	9.60	5.80	9.60
Cost Effectiveness ($/B)		$1.25	$4.20	$1.97	$3.80	$2.59	$3.65	$3.10	$3.13	$3.28	$3.13

Using the 2025 PMEP tool, in order for SL5 to be identified as the PMEP alternative, every single one of the following elements would have to exist:

- the cost for SL5 would need to be lowered from $37M to $30M. In other words, the costs would have been overestimated by $7M in Volume III. This much of an overestimate is unrealistic.
- the benefit scores for Permanence and Implementability for SL5 would need to be increased from 9 to 10, and from 6 to 10, respectively. In other words, the benefits would have been underestimated in Volume III.
- the cost for SL3 would need to be increased from $10M to $19M. In other words, the costs would have been underestimated by $9M in Volume III. This much of an underestimate is unrealistic.
- the benefit scores for all criteria for SL3 would need to be lowered. Again, an unrealistic estimation of the benefits of SL3.

6.0 Conclusion

Ecology used the 2025 PMEP guidance and tool to evaluate the soil Alternatives SL3 and SL5. Using the tool with the costs and benefits in Volume III DCA, the PMEP alternative is Alternative SL3. Ecology made some adjustments to costs and benefits as suggested by Integral, and the PMEP alternative remains Alternative SL3. A sensitivity analysis shows how further adjustments and manipulations to costs and benefits could in theory lead to the PMEP alternative being Alternative SL5. However, the adjustments and manipulations necessary to achieve this are extremely and highly unrealistic. Using the 2025 PMEP guidance and tool, the PMEP alternative is Alternative SL3.