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28 October 2019

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Marian Abbett, P.E.  
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Jim Pendowski  
Program Manager  
Toxics Cleanup Program

**RE: Port Angeles Rayonier Mill Cleanup Plan** FSID #: 19 CSID#: 2270

Dear Director Bellon, Ms. Lawson, Ms. Abbett and Mr. Pendowski:

The undersigned organizations and individuals are submitting our comments for the *Port Angeles Rayonier Mill Cleanup Plan*, which is dated xx, 2019. We actively are working towards the cleanup of the Salish Sea, which includes the Strait of Juan de Fuca and Hood Canal. Some of our organizations were petitioners to USEPA Region 10 for the Superfund listing of the site in 1998. Our comments follow:

- **Removal of structures and debris.** We support the removal the jetty and the wharf, with its nearly 1000 creosote pilings and newer arsenic-based pilings will be removed. We hope these removals will soon be undertaken.
- **Options that leave contaminants in place.** We oppose the proposed upland and sediment options which leave the pollutants in place, cover them with soil or sediment, monitor the site over years, and rely on institutional controls (such as signage, fencing, and allowing site access twice a week). This will not protect the public, nor the marine ecosystem, nor the wildlife. It will leave all life vulnerable for years. The proposed option does not meet the intent of the Shoreline Management Act nor, again, the Puget Sound Partnership cleanup mandate, of which Ecology is a major partner.
- **Option that removes contaminants.** We strongly support options that will remove contamination -- alternatives 5 for sediments and for soils. We believe that Rayonier is a wealthy company and can afford the best cleanup options at only \$55 million for sediments and \$37 million for soil. The company should leave the Port Angeles community and Puget Sound healthy.

As sea level rises and as storm surges create more destruction along our coastline, it makes no sense – morally or financially - to leave the hazardous

waste in place. The waters host endangered and threatened species, including chinook and Southern Resident Killer Whales. Furthermore, a quality cleanup, as was done by the Port of Port Angeles at the KPly/PenPly site and at Site 4 in the Lower Duwamish Waterway -- complete removal -- results in the elimination of future costs and maintenance, long term monitoring and liability.

Lastly, Ennis Creek, which runs through the center of the mill in which citizens and the Lower Elwha Klallam Tribe invested many resources towards its renovation, is known for having the greatest potential for salmon habitat recovery among Port Angeles's streams. We have an obligation to assure that the fish and other wildlife are not endangered by remaining hazardous wastes and not treated with the best available technology. Wastes left at the site will defeat the tremendous investments made to date.

We cannot return to the early days of looking the other way and allowing the pollution. The moral compass of our culture has changed. As you can see, there is broad interest in how this area will be restored. Together these signatories represent thousands of citizens. We strongly urge you to hold Rayonier to the best cleanup option. Be a leader. Remain committed to cleaning up Puget Sound. Protect our natural resources, our wildlife, and our public health. Get this done well and soon.

Please see the attached technical comments from Dr. Peter deFur, Environmental Stewardship Concepts, LLC .

Signed,

*Paula Mackrow*  
Paula Mackrow, President

other signatories follow

Attached: Environmental Stewardship Concepts, LLC . Technical Comments

**The following organizations and individuals that have signed this letter should be kept abreast of developments at the Rayonier site. Their addresses are provided in order that Ecology can keep them informed.**

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