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Sent: Friday, August 1, 2025 11:28 AM

To: Abbett, Marian L. (ECY) <MABB461@ECY.WA.GOV>

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Subject: Port Angeles Business Association Public Comment for the Rayonier Mill Cleanup

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

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