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.

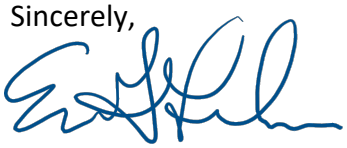
- Allowing Rayonier – who has no longer has a local presence and is a multi-billion dollar conglomerate – to be relinquished of their responsibility after complying with an order for less than complete clean up leaves the community of Port Angeles to shoulder an unequitable amount of the burden for a 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