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