



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.

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Pete Steelquist
Washington Policy Manager

A handwritten signature in black ink, appearing to read "Liz Schotman", written over a horizontal line.

Liz Schotman
Washington Regional Manager