

Karen Hanan

A Call for Complete Remediation at the Former Rayonier Mill Site
To the Washington State Department of Ecology

The future of the former Rayonier mill site in Port Angeles demands nothing less than a comprehensive and permanent environmental cleanup. As an evolving community, Port Angeles's economic and community vitality are intrinsically linked to the complete remediation of this crucial waterfront area. Only a full cleanup can definitively resolve the site's persistent contamination and its related environmental, economic, and community problems.

It is imperative to acknowledge that the responsibility for this full cleanup lies squarely with Rayonier. For years, the company enjoyed significant prosperity as a direct result of the mill's operations in Port Angeles. This history of profitability, however, came at a severe environmental cost, leaving behind a legacy of pollution that continues to harm the community and its natural resources. Given their past gains and the scale of the damage inflicted, Rayonier, with the Department of Ecology's oversight, has a profound moral, ethical, and legal obligation to ensure a complete and thorough remediation of the site.

For decades, the mill's operations resulted in severe environmental degradation. The vital salt marsh, which served as an essential estuary for Ennis Creek fish, was egregiously paved over, and Ennis Creek itself was straightened and narrowed. This directly impacted critical salmon spawning grounds, leading to the washout of gravel, eggs, and young fry into the harbor. Furthermore, over 4,000 timber pilings continue to leach creosote, a known toxic substance containing polycyclic aromatic hydrocarbons (PAHs), into the harbor's shoreline waters and bay floor. These contaminants pose ongoing, unacceptable risks to marine ecosystems and human health.

Beyond the immediate local impact on Port Angeles, the full cleanup holds profound environmental importance for the entire Olympic Peninsula. The health of the Port Angeles Harbor is interconnected with the broader Salish Sea ecosystem, a vital regional resource. The removal of these persistent pollutants will contribute significantly to regional ecological recovery, enhance biodiversity, and support the health of a globally significant marine environment.

Moreover, the land on which the mill was built holds immense cultural significance for the Lower Elwha Klallam Tribe. This site is part of their ancestral lands, and the complete restoration of the natural environment is crucial for the preservation of their cultural heritage, traditional practices, and the spiritual connection to their land and waters. A truly clean site respects this deep cultural tie and supports the Tribe's ongoing efforts to restore their ancestral resources, including the recently re-established salmon runs on the Elwha River.

Current proposals for partial cleanup, such as "SL3," which suggests merely capping and fencing off a contaminated 10-acre area with 30 years of monitoring, are fundamentally inadequate. Such an approach does not remove the contaminants but merely covers them, leaving the potential for future release due to natural events like erosion or seismic activity, and creating a perpetual environmental liability for the community. This is not merely a compromise; it is a false economy that defers true remediation and perpetuates risk. A capped site would also severely constrain any future development, physically and legally limiting the potential for the waterfront. The true costs of such a limited approach are significantly underestimated when considering long-term maintenance, monitoring, and the lost opportunities for the community.

In stark contrast, "SL5," which advocates for a complete and permanent cleanup, represents the only viable path forward. This approach involves the full removal of all contaminants, ensuring that the site is truly healthy and safe for future generations. A complete cleanup aligns perfectly with the community's vision for the waterfront, as articulated in the new comprehensive plan. This plan

reimagines the former heavy industrial zone as a vibrant mix of open space, recreation, walkable commercial areas, hospitality, housing, public facilities, and clean industries. Only with full remediation can this transformative vision be realized, unlocking the site's immense potential for economic revitalization and community well-being. The economic and community vitality of Port Angeles hinge in part on the successful transformation of this important waterfront parcel. The overwhelming public sentiment, expressed in previous calls for input, has consistently favored complete contaminant removal. The Department of Ecology, as the state's lead environmental protection agency, bears the critical responsibility to oversee cleanup that prioritizes the long-term health of the environment and the community. While concerns about cost and logistical challenges for off-site disposal have been raised, these are surmountable. The long-term costs of inaction—including continued environmental degradation, public health risks, depressed property values, and lost economic opportunities—far outweigh the investment in a comprehensive cleanup. Now is a critical time for the Department of Ecology to decisively implement SL5 and ensure a complete and permanent cleanup. This is essential to uphold environmental accountability, to honor the cultural heritage of the Lower Elwha Klallam Tribe, and to transform this historically polluted site into a source of community pride, a healthy ecosystem, and a dynamic economic asset for decades to come.

Sincerely,

Karen J. Hanan

183 Peele Rd, Port Angeles WA 98363