

# NORTH OLYMPIC Land Trust



*Farms • Fish • Forests*

319 S. Peabody St., Suite B  
P.O. Box 2945 (mailing)  
Port Angeles, WA 98362  
Phone: (360) 417-1815  
NorthOlympicLandTrust.org  
info@nolt.org

## **Board of Directors**

Erika Lindholm  
*President*

Jack Williams  
*Vice President*

Julie Knobel  
*Secretary*

Jason Bausher  
*Treasurer*

Sissi Bruch

Wendy Clark-Getzin

Bobbie Clawson

Diana Erickson

Kim Sager-Fradkin

Anna Swanberg

Richard Tucker

Karen Westwood

Gary Colley, *emeritus*

John Willits, *emeritus/in*  
*memoriam*

North Olympic Land Trust  
is accountable:



- Sound Finances
- Ethical Conduct
- Responsible Governance
- Lasting Stewardship

August 4, 2025

## **Washington State Department of Ecology**

Attn: Marian Abbett

PO Box 47775

Olympia, WA 98504-7775

## **Subject: Public Comment on the Rayonier Mill Cleanup Site and Proposed Interim Action Plan**

Dear Marian Abbett,

On behalf of North Olympic Land Trust, a non-profit organization dedicated to conserving the lands and waters of the Olympic Peninsula for the benefit of all, we are pleased to submit this public comment regarding the proposed cleanup actions for the former Rayonier Mill site at the mouth of Ennis Creek. Our mission is to protect the region's natural resources, including important farmland, forestlands, and wildlife habitats. We are specifically and deeply committed to habitat restoration and salmon recovery in the Ennis Creek watershed, where we have conserved a number of properties upstream of the clean-up site. We appreciate the opportunity to provide feedback on this critical matter.

We have reviewed the proposed cleanup documents, including the Draft Interim Action Plan and the Consent Decree. We want to express our strong concern that the current proposal, Option SL-3, is not a sufficiently permanent or protective solution for this vital property. Based on our dedication to the long-term health of this ecosystem, we believe that the Department of Ecology must require the complete removal of all contaminants from the property, as outlined in **Option 5**.

Specifically, we wish to highlight the following points:

- **Flawed Cost Analysis and Long-Term Liability:** The cost estimates for the proposed cleanup options are a critical factor, especially since the Consent Decree will relieve the Potentially Liable Party, Rayonier, of future liability once the cleanup is complete. The published costs appear to undervalue the true long-term expenses of Option SL-3 (on-site capping), which will include perpetual monitoring, maintenance, and the risks associated with natural disasters. Conversely, the cost estimate for a complete removal (Option 5) seems disproportionately high, particularly given that a one-time, permanent cleanup would eliminate these ongoing costs and risks. We believe a revised, more comprehensive cost-benefit

analysis will show that Option 5 is the most responsible and cost-effective long-term solution.

- **Impact on Upstream Conservation and the Natural Environment:** North Olympic Land Trust has conserved a number of properties upstream on Ennis Creek. The proposed cleanup, which involves capping contaminated soil on-site, poses a long-term risk of re-contaminating the environment. We are concerned about the potential for dioxins, furans, PCBs, and other pollutants to migrate from the capped area due to sea level rise and seismic activity, which could impact our protected lands and the broader Port Angeles Harbor ecosystem. A full cleanup is the only way to safeguard our investment in upstream conservation efforts.
- **Water Quality and Habitat Restoration:** Ennis Creek is recognized as the healthiest of Port Angeles' urban streams and is the last best chance for salmon and steelhead habitat in the area. Leaving contaminants buried on-site will continue to threaten water quality and prevent the full recovery of this critical habitat. We urge the Department of Ecology to adopt a permanent solution that supports the full recovery of Ennis Creek and its fish populations through specific restoration actions, including the restoration of the salt marsh at the mouth of the creek, encouragement of meanders along its length, and the removal of all pilings in the nearshore.
- **Respect for Tribal Treaty Rights and Cultural Significance:** The mouth of Ennis Creek is a historically significant site, formerly home to the Lower Elwha Klallam village of I'e'nis. The Tribe has expressed a desire for cleanup that restores the site to a natural state and supports their treaty rights to harvest aquatic resources. We support these goals and believe that a full removal of contaminants (Option 5) is the only way to honor the cultural and historical significance of this location.

We are committed to working collaboratively with the Department of Ecology and other stakeholders, including the Lower Elwha Klallam Tribe and Friends of Ennis Creek, to ensure that the cleanup of the Rayonier Mill site is as complete and protective as possible. Our community has been waiting for over two decades for a final, effective cleanup of this site. We strongly urge the Department of Ecology to seize this opportunity for a permanent and positive resolution for the health of our environment and our community.

Thank you for your time and for the opportunity to comment. We look forward to your response and to continued partnership in environmental stewardship.

Sincerely,



Tom Sanford  
Executive Director  
North Olympic Land Trust