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ITT Rayonier enjoyed decades of profitable operation at the Port Angeles site that unfortunately resulted in significant toxic contamination and an ongoing threat to human health and the marine and terrestrial environment. Anything less than a full SL5 clean-up of the site falls short of the legal and moral responsibility the company has to the city of Port Angeles, the Lower Elwha Clallam tribe, and the broader region.

By the Department of Ecology's own admission, the engineering and operational cost of the incomplete SL3 alternative of mounding and capping contamination in place cannot be known at this time due to the unique challenges of the site and the unknowns of the solution. What can be known with certainty, however, is that leaving toxic materials in place at the site simply delays the time when the toxic materials will again threaten human health and the broader environment. No engineering solution is ever perfect nor impervious to the passage of time, particularly in a seismically active location adjacent to a large body of water and in the outflow of a stream in an area of sometimes extreme precipitation. Leaving contaminants in place merely leaves an ultimate reckoning to future generations ever further removed from creating the problem in the first place.

A full cleanup of the site is required for the former industrial site to ever realize its full potential. I strongly urge the Department of Ecology to require an SL5 site cleanup.