# Alex Wilson

Please see attachment for public comment.

**From:** Alex Wilson

7/28/2025

**To:** Washington State Department of Ecology

**RE: Demand for Complete Cleanup and Restoration of the Rayonier Mill Site, Port Angeles**

Dear Officials,

I am writing as a concerned resident regarding the ongoing remediation of the highly contaminated Rayonier Mill site at the mouth of Ennis Creek in Port Angeles, Washington. I am alarmed by recent proposals for a partial cleanup that fall drastically short of what is necessary to restore this crucial estuarine environment, protect public health, and safeguard our natural and cultural heritage. I urge all responsible agencies and stakeholders to require **full and complete cleanup and restoration** of the site, as was originally mandated by law and supported by numerous government reports.

**Legal and Regulatory Basis for Complete Cleanup**

Federal, state, and local agencies have, at various points, made it abundantly clear that only a comprehensive, science-driven cleanup of the Rayonier site is acceptable:

- **Washington Department of Ecology:** The site is subject to the state's Model Toxics Control Act (MTCA), which requires complete cleanup to protect human health and the environment. According to Ecology, "The goal of MTCA cleanups is to restore the site as close as possible to its original condition…" [WA Ecology, Rayonier Mill Site]
- **US Environmental Protection Agency (EPA, Region 10):** The Rayonier site has been evaluated under federal Superfund standards; EPA Region 10 has stated, "Restoration of the Ennis Creek estuary is necessary for the protection of endangered salmon and steelhead and for the health of the marine ecosystem." [EPA Rayonier Mill Site]
- **Port Angeles City Comprehensive Plan:** The City recognizes the site's restoration as critical to meeting obligations under the Clean Water Act and Endangered Species Act and for honoring tribal resource rights.[[Port Angeles Comp. Plan, 2016 Update, Sec. 4]]
- **Clallam County Comprehensive Plan:** Calls for "restoration of contaminated aquatic and shoreline environments to full biological health" particularly at industrial legacy sites such as Rayonier.[[Clallam County Comp. Plan, 2015, Natural Systems Element]]

**Precedent and Rayonier's Cleanup Obligations Elsewhere**

Rayonier has previously been required to conduct full and thorough cleanups at other former mill sites:

- **Fernandina Beach, Florida:** The EPA required removal of all visible tar deposits, chemical residues, and contaminated soil and groundwater. [EPA, Fernandina Beach Site Report, 2013]
- **Jesup, Georgia:** Cleanup activities included not only surface but subsurface and groundwater remediation, empirical monitoring, and restoration of wetlands impacted by the company's operations. [Georgia EPD, Rayonier Mill Cleanup Summary, 2016]

Given this precedent, there is no legal, moral, or scientific justification to allow Rayonier to walk back its obligations in Port Angeles. [1]

**Washington State's Record of Mandating Thorough Cleanups**

Washington's Model Toxics Control Act (MTCA) sets a high bar for site restoration, requiring that cleanups permanently protect human health and the environment. This law applies consistently across sites, whether in urban or rural settings—and numerous similar contaminated locations have seen full, permanent remedies imposed:

- **Port Gamble Bay Cleanup:** In Kitsap County, the Washington Department of Ecology and the Port Gamble S'Klallam Tribe required all contaminated mud, wood waste, and debris from the former Pope & Talbot mill to be removed. Nearly 110,000 cubic yards of sediment were excavated from the bay, restoring it for ecological and tribal use.
- **Bellingham Bay (Georgia Pacific Site):** The sprawling Bellingham mill was forced into complete soil, groundwater, and sediment cleanup, including removal of mercury-contaminated sediments, with a requirement for full environmental restoration[2].
- **Lower Duwamish Waterway (Seattle):** Although the scale is urban, the Department of Ecology and EPA mandated a comprehensive, phased cleanup of contaminated river sediments at multiple legacy industrial sites, emphasizing full removal or treatment where feasible[3].

These are but a few examples out of thousands of toxic site cleanups, many in less visible locations, showing the State does require full and permanent restoration to health and safety benchmarks[2].

**Disparities in Rural vs. Urban Toxic Site Cleanups**

A State review has highlighted administrative, financial, and equity gaps in how toxic cleanups are managed across Washington. Rural areas like Port Angeles, smaller towns, and tribal lands frequently face pronounced challenges compared to wealthier urban centers:

- **Administrative Capacity:** Rural communities typically have fewer staff and technical resources to advocate for, oversee, and sustain complex cleanups, as compared to major cities like Seattle or Tacoma, where environmental justice, real estate pressure, and stronger local government capacity drive more rigorous, visible cleanups[4].
- **Funding and Timeline Disparities:** The lengthy, underfunded Rayonier process—over 25 years so far—contrasts with more rapid action often seen at high-profile or urban sites where political and economic incentives are more concentrated[4].
- **Equity Impacts:** Studies reveal toxic sites disproportionately impact low-income, tribal, and rural communities, both in terms of site burden and in the slowness or partial nature of remediation, raising serious concerns of environmental injustice[5,6].

**Ecological, Economic, and Cultural Imperatives for Full Cleanup**

- **Salmonids and Wildlife:** The lower Ennis Creek estuary is a critical habitat for endangered salmon, steelhead, and other aquatic species.[[WDFW SalmonScape],[NMFS Biological Opinion, 2020]] Olympic National Park successfully protects the headwaters, but pollution at the estuary destroys downstream habitat, undermining investments in salmon recovery and **violating Tribal Treaty Rights**.
- **Culvert Removal and Restoration Investments:** Washington State and Clallam County have spent **millions** restoring fish passage through culvert remediation upstream. Without full cleanup and estuary restoration, these taxpayer investments are wasted, as fish cannot survive if the estuary remains toxic.[[WA State Fish Barrier Removal Board][Clallam County Public Works, 2022]]
- **Historic Village and Ennis Creek Mouth:** The Rayonier site overlies a pre-contact Lower Elwha Klallam village and fish camp, one of the last historically documented sites at the mouth of Ennis Creek. To allow its continued burial under poisoned sediment and pavement is a violation of our collective responsibility to history and to the Lower Elwha Klallam Tribe. [[WA State Historic Preservation Office, Site Inventory #CL-LVK-01]] The National Park Service has declared the restoration of this estuary as a top priority for regional cultural resources and salmonid recovery.[[NPS, Olympic National Park Resource Management Plan, 2018]]

**Conclusion: Demand for Full Accountability**

Partial cleanup is neither scientifically justified nor legally supportable. It is essential, for human and ecosystem health, for respect of Indigenous historical sites, and for honoring our considerable public investments in fish passage, that Rayonier be held to the highest standard of full cleanup and restoration.

I urge all relevant agencies to reject half-measures, enforce existing legal and regulatory requirements, and work transparently with the Lower Elwha Klallam Tribe and the local community to restore the Rayonier site to a standard that ensures lasting health, justice, and ecological integrity.

Sincerely,
Alex Wilson

## Key Citations (for Reference):


1. WA Dept. of Ecology, Rayonier Mill Site Cleanup
2. EPA Region 10, Rayonier Port Angeles Site
3. City of Port Angeles Comprehensive Plan, 2016 Update
4. Clallam County Comp. Plan, Natural Resources
5. EPA, Fernandina Beach FL Cleanup
6. Georgia EPD, Rayonier Mill (Jesup)
7. WA SalmonScape Map
8. Lower Elwha Klallam Tribe, cultural resources
9. WA Fish Barrier Removal Board
10. NPS, Olympic National Park, Resource Management
11. WA Office of Archaeology & Historic Preservation


Footnotes:

1. https://ecology.wa.gov/spills-cleanup/contamination-cleanup/cleanup-sites/puget-sound/port-angeles-harbor/rayonier-mill
2. https://ecology.wa.gov/spills-cleanup/contamination-cleanup/cleanup-sites
3. https://www.epa.gov/superfund-redevelopment/superfund-sites-reuse-washington
4. https://apps.ecology.wa.gov/publications/documents/0909043.pdf
5. https://frontandcentered.org/wp-content/uploads/2017/01/MTCA-Report_1-25-17.pdf
6. https://www.theurbanist.org/2017/01/12/map-week-neighborhood-toxic/