

**From:** Jim Sherman <[jimsherman1945@gmail.com](mailto:jimsherman1945@gmail.com)>  
**Sent:** Friday, July 25, 2025 8:57 PM  
**To:** Abbett, Marian L. (ECY) <[MABB461@ECY.WA.GOV](mailto:MABB461@ECY.WA.GOV)>  
**Subject:** public comment

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Please consider the attached comments regarding the Rayonier toxic waste site in Port Angeles.

**Attachment:**

To: Washington Dept. of Ecology

Re: Rayonier @ Port Angeles

I write to give my comments regarding the clean-up (or lack thereof) of toxic waste at the Rayonier property in Port Angeles. I was appalled to learn that 28 years of non-action has slipped by with the issue still unresolved. For 28 years the Rayonier company has used attorneys and lobbyist to postpone spending money and has relied on changes in government and bureaucratic loss of focus. The company started in WA with saw mills on the Olympic Peninsula. This is not the only property that Rayonier has polluted and walked away from in the PNW. During this same time period the list below shows business dealing that have taken place:

1952: Started giving charitable gifts to civic and educational organizations.

1994: 969,000 acres purchased in the southeast US.

2006: 228,000 acres purchased

2008: 56,000 acres purchased for \$215 million

2013: Sold mill for \$80 million. Bought shares in Matariki Forestry Group for \$140 million

2016: Purchased 61,000 acres in Ore for \$263 million and 55,000 acres in WA for \$130 million.

2022: Started a 26,000 acres development in Wildlight, Florida. Bought Pope Resources in the PNW.

2025: Intending to sell a New Zealand properties for \$710 million.

It should be obvious to anyone that this company has the resources necessary to finance the clean-up required in Port Angeles and the difference between proposal (3) and (5), although no small sum, would not put a significant dent in Rainier's profits. This is a publicly traded company which has the intent to provide the largest possible return on investment for the shareholders, without regard for the community in which it has done business or the ecology of the area it has disrupted.

I would also draw your attention to the estimates for the proposed two clean-up methods. I understand that these costs are based on a percentage that have been used on other jobs. I would argue that the cost of solution (5) would be much less than the amount that has been estimated based on the fact that solution (5) is much simpler in its planning and engineering than proposal (3). I also do not believe that enough money has been included in the long term (forever) maintenance and monitoring that proposal (3) would require to ensuring ongoing safety.

After reviewing proposal (3) I was interested in why the 10-acre toxic waste dump site covered by 2 feet of clean earth needed to be fenced. Could that mean that humans would still not be safe around that site? The point I wish to make is that proposal (3) is really not a permeant and final solution to this toxic waste site. The waste is still there. 10 acres of the property could not be used. It would have to be monitored by a company that does not really care about the problem. Additionally, possible future natural disasters would force a second clean-up effort. Who would pay for that clean-up?

I would prefer that the Dept. of Ecology choose the permanent solution which is proposal (5), the so-called dig and dump plan. It is time for your department to live up to your mandate to protect the people and environment of the state of Washington. It has been 28 years of "kick the can down the road", so now is your (a new generation of ecologist) chance stand up against those who pollute.

Thanks for reading this and your consideration.

Jim Sherman, 5153 Blue Mountain Road, Port Angeles, WA. 98362  
jimsherman1945@gmail.com