

**From:** Robbie Mantooth <[ennis@olypen.com](mailto:ennis@olypen.com)>

**Sent:** Wednesday, August 6, 2025 9:46 PM

**To:** Abbett, Marian L. (ECY) <[MABB461@ECY.WA.GOV](mailto:MABB461@ECY.WA.GOV)>

**Cc:** Sixkiller, Casey (ECY) <[csix461@ECY.WA.GOV](mailto:csix461@ECY.WA.GOV)>

**Subject:** Public Comment Submission – Port Angeles Rayonier Mill Study Area Cleanup

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Dear Marian,

Thank you for your leadership and the opportunity to work with you.

As you see from comments arriving every day, people are adamant in wanting a complete cleanup. We certainly hope that unanimity will lead you to follow their desires.

I'm sure I don't need to tell the Ecology team working on the Interim Action Plan (ICAP) for the Rayonier Cleanup Study Area how complex this issue and all related documents are. Even though the current comment period is focused on cleanup under the state Model Toxins Control Act (MTCA), not restoration under the federal Natural Resource Damage Assessment (NRDA) law, as co-founders of Friends of Ennis Creek my husband, James E. "Jim" Mantooth, and I appreciate the ICAP's references to restoration. Thorough cleanup is essential for long-term as well as more urgently needed restoration.

We respect the care for related laws Ecology's team for the Rayonier property has shown. But we believe more attention needs to be given to the judgment the Plan (ICAP) also says it can use. This is essential for making sure needs of those most in need of the site's land and adjacent waters receive priority. Most important are the fish of Ennis Creek — including steelhead listed under the Endangered Species Act or likely to be by the time Ecology proceeds with a plan. We are seeing evidence of their decline as well as that of the stream's native coho salmon and sea-run cutthroat trout. I first learned of the abundance of these fish in numerous reports I read when serving as a representative for our Watershed Resources Inventory Area group. Fish experts described Ennis Creek as the urban stream with the greatest potential for productivity.

We also heard Rayonier mill workers talk of watching the fish return to Ennis Creek. Mill operators had narrowed the stream to make it fit under a building where they were working, so they must have had a good view.

People we knew even talked of going to Ennis Creek to club the fish when they were so abundant they filled the stream. Of course, their deaths before being able to fulfill the purpose of their return to their natal stream deprived them of being able to create nests where spawning and fertilizing eggs would get the next generation started. Their carcasses would not even be available to nourish the bears, cougars, eagles, other animals, trees and other plants that depend on the vital riparian area created as Ennis Creek flows from the snowfields below Mount Angeles, in Olympic National Park, through land the State Department of Natural Resources manages and parcels under individual ownership. Three parcels, containing a total of more than 50 acres of watershed, are protected in perpetuity through voluntary conservation easement agreements with North Olympic Land Trust, which provides annual (not the every five years the Plan allows Rayonier) monitoring to make sure agreements are being fulfilled. The Land Trust, accredited by the national Land Trust Alliance and highly regarded as a partner for long-term conservation values, protects additional acreage through direct ownership.

I am providing this detail to reinforce our community's connections with Ennis Creek, its watershed and adjacent waters of Port Angeles Harbor, Puget Sound and other marine ecosystems. Port Angeles long has supported the Art Feiro Marine Life Center, named for a beloved Peninsula College professor so dedicated to sharing knowledge and caring that he led efforts before his untimely early death to build the original structure, on the Port Angeles City Pier. The red jump suit I wore as one of many volunteers applying the building's paint in the early 1980s still carries white blobs I dropped on it and always will treasure as one of many ways our community came together for shared efforts and benefits. A former Peninsula College fisheries student and Ennis Creek volunteer, Bob Campbell, became the Marine Life Center's beloved manager. My husband and I are stretching our family budget to donate monthly for the building that will replace it as part of the next phase of Waterfront Center construction after our community came together for most of the Field Arts & Events Hall fundraising. The building will include recognition of the many contributions to research and education Bob made before his death.

We try to do everything we can to follow such examples as Art Feiro, Bob Campbell and others in what we believe is an exceptional community. We couldn't begin to count the people who have learned and gained community cohesiveness with such influences as are tribes, the Marine Life Center, Land Trust, Dungeness Nature Center, North Olympic Salmon Coalition, Clallam Conservation District, Olympic National Park and NatureBridge. They enhance our community and contribute to the sustainability — perhaps even survivability — of our planet.

My husband and I hosted the event the Land Trust started as StreamFest for a dozen years. Beginning with guided walks to Ennis Creek, it evolved into opportunities for diverse businesses, organizations and governmental entities to celebrate our environment while gaining knowledge and inspiration for living in harmony with it. Port Angeles Garden Club continues with the version it calls Forever StreamFest in the City Park just north of Field Hall and has explored expanding with offerings in the Hall. One of our sons even performs his original music with environmental awareness inspiration themes there and we work with other volunteers to host a booth for the Friends of Ennis Creek organization Jim and I established.

Celebrating the fish and other animals using Ennis Creek has been a priority since we got a chance to buy property in the stream's watershed. We are about as concerned about their well-being as we have been about our own family and those we've cared for in our professional lives — Jim as a children's doctor and I as a teacher and student newspaper adviser at our local college.

We try to make the steep descent and climb back to visit Ennis Creek at least weekly and sometimes daily. In the 50 years we've lived near the stream we've marveled at watching large coho making their way upstream. We've delighted in hearing coho splashing while females lay eggs and males compete to fertilize them. We like to peek into one of the side channels the Lower Elwha Klallam Tribe (LEKT) created as part of its model restoration inspired by our conservation easement agreement with North Olympic Land Trust. When we sent a photo of a large, long fish to a fisheries expert at the Tribe, we were excited to learn it represented the first documented sighting of a summer-run steelhead. Only winter-run steelhead had been officially noted before in Ennis Creek.

So not seeing any evidence of fish in recent years has convinced us of emergency conditions for the coho salmon, steelhead and sea-run cutthroat trout of Ennis Creek as well as others, including chinook salmon, we're told would come with improved habitat.

Of course, all those involved in cleanup and restoration efforts know many of the reasons for what we believe is an emergency, but I am repeating some of them for those who may read these comments and not know — just as I did not know before becoming so dedicated to saving “our last best chance of a salmon stream in Port Angeles.” These problems related to lack of an estuarine environment, adequate space for stream meander and pollutants remaining from Rayonier mill operations need immediate action, following the precedent of interim remedial actions taken early in the history of efforts to clean up and restore the former Rayonier mill site.

ESTUARY — We don't know exactly how long Ennis Creek fish have been deprived of the brackish water salmonids need to make physical adaptations for moving from the stream's freshwater to the saltwater of Port Angeles Harbor and beyond to grow and get ready to return, adapt again and produce another generation of these iconic fish. Photos taken during the days of the Puget Sound Cooperative Colony's utopian community alongside Ennis Creek in the 1890s clearly show a salt marsh that would have functioned as an estuary, providing essential brackish water. Rayonier must have drained and paved that space sometime after it purchased the land where it operated a mill from 1930 to 1997, using toxic chemicals to turn wood pulp into a variety of products, including photographic film and hosiery. We understand a tribal cemetery remains beneath the pavement.

More than one observer of this desecration has quoted the Joni Mitchell song about paving paradise and putting up a parking lot. It's time for us to right these wrongs through some sort of emergency interim remedial intervention coordinated with cleanup. That earlier interim remediation combined cleanup and habitat restoration.

2. SPACE — Salmon streams need room they had when they were edged with big conifers essential for shade and nutrition for fish from bugs in their bark. Before replacement trees mature and fall into waters with their bugs, Ennis Creek needs space for logs to be moved in and anchored. The logs and log jams they create will force the stream to again be more sinuous, slowing flows enough to protect spawning gravels and nests from getting scoured.

They also give young fish places to hide from predators and protect them from getting washed out into the Harbor without the physical adaptation or size that might help them be more likely to survive.

Just as interim remediation that removed fuel from Ennis Creek early in the MTCA cleanup process included moving the stream enough to reduce its artificially straight and narrow shape, the stream desperately needs intervention now. It seems that the expertise, creative minds and networking background of Ecology's team, with guidance from the Lower Elwha Klallam Tribe, should be able to do something about overcoming the constraints Rayonier put on the stream as well as the loss of the salt marsh with its brackish water when it paved it for a parking lot.

3. POLLUTANTS —The fact that toxins still are harming fish and other marine life seems representative of the problems caused by division of responsibilities into cleanup and restoration. The team working on cleanup under MTCA can't change the law, but they should be able to expedite removal of all contaminants and increase opportunities for restoration. How long have people known the creosote pilings under Rayonier's dock are poisonous? Why haven't they been removed? It's way past time to get them and affected sediments to a landfill such as one in eastern Oregon where they can be stored safely.

Isn't it just a matter of time before Ecology is sued by people who have consumed contaminated seafood from Port Angeles Harbor? Warnings can't be adequate. And, if toxins are harmful to marine life, why aren't people warned about the dangers of affected waters for themselves, their children and pets? Of course, we also are concerned about damage to wildlife. Thinking warning signs will help them avoid the area, as one professional consultant stated, just plain "silly" — unless someone knows how to teach them to read.

Not many years ago I believe I was only one of two or three people testifying against Rayonier's proposal to put even more pilings under its dock when dangers of the creosote impregnating them already were known. The mayor at that time gave me this advice, in a superior-sounding voice: If we don't let Rayonier add more pilings, how are you going to feel when the dock collapses and pilings are scattered farther? The cost-benefit analysis from that past Mayor and City Council members obviously placed higher value on Rayonier

continuing to profit from its dock than on the health of fish, other marine life, people, pets and wildlife exposed to toxins. Surely the authors of the Interim Action Plan can do better.

Port Angeles is fortunate to have much more enlightened leadership for the City, County, business and economic development community, nonprofits and tribes as well as ordinary residents who give time and resources out of appreciation for this exceptional place. Their realization of the importance of protecting quality of life for all sharing our area is particularly impressive when thinking about the enormous changes harming jobs and financial stability we've experienced over the decades of many residents' lifetimes. Ecology needs to respect the significance of people here supporting good habitat for all despite financial insecurity and not wanting to gamble losing it because of a patch of contaminants Rayonier doesn't want to pay to have moved to a landfill appropriate for them, such as the one often mentioned in eastern Oregon. We appreciated payrolls companies like Rayonier provided, but it's time to promote an economy that depends more on providing quality of life for people living and visiting here.

Just as some people once saw no problem with creosote, how do we know all the soils Ecology now considers least contaminated and wants to keep on the former mill site don't contain what also will be found harmful to health?

No one can know the future use of the Rayonier land with certainty. But if ALL contaminants are moved to an appropriate landfill, that will increase the former mill site's suitability for various uses, including the restored estuarine area, as well as space for a stream with the sinuosity and wood it once had. Only a Level 5 cleanup will do that.

Rayonier has had more than a quarter century to proceed much more rapidly than it has toward better cleanup and restoration. Costs keep rising for Rayonier, and patience keeps running out among the public.

Reading comments people submitted in 2019 in response to Ecology's previous cleanup plan tests one's patience. We've tried to be patient while also persistent, as the indigenous people have been despite countless desecrations of land, water, air, plants, animals and human health. But it is dispiriting that some comments coming in now repeat the

arguments from the past, even from some of the same people! How can we have faith our oft repeated comments will make any difference?

When I asked the Ecology team why public opinion was so little valued when essentially all comments during the last time Ecology accepted them, in 2019, demanded a complete cleanup, I was told public opinion counts for only 10% in the cost-benefit analysis. Does that make our comments meaningless? The law's allowance for judgment in addition to such cold mathematical calculations would seem to enable people — mostly local — whose priorities for a complete cleanup obviously are only motivated by concerns for health and well-being of all life receive more respect. Sometimes locals can be so influenced by perceived material benefits that a broader view is needed. But who can argue with people wanting to do right for health and well-being of all life?

Ecology has sidestepped my questions about why cultural and commercial values of Ennis Creek's dwindling salmonid populations aren't being considered when determining costs for Level 5 to be "disproportionate" to benefits of taking all contaminants to an appropriate landfill. If the contaminants can't cause any harm, why are fences, signs and monitoring necessary? Why go to the expense of engineering and other calculations to protect against leakages from sea-level rise, extreme weather and such incidents as earthquakes and tsunamis?

The population in the town where most of the commenters live may be small, but that doesn't mean we're stupid.

We're thankful the City has hired experts who have found disparities in calculations Ecology has provided about cleanup levels 3 and 5. I have more faith in the City's consultants than in justifications Rayonier must believe it is obligated to make to its shareholders. We need to be able to have faith the State Department of Ecology isn't being more compliant with Rayonier's desire to save money than our state public servants should be.

We taxpayers are bearing the expense of improved fish passage, including the one for Ennis Creek under Highway 101. The least Rayonier can do is pay for cleanup and restoration of what enabled it to make great profits over many years.

We appreciate what members of the team have said about future opportunities to weigh in on topics still being researched, but we need written assurances not only about being able to comment but also about having our opinions given more regard than a meaningless 10%.

Failure to exercise appropriate judgment beyond explicit legalities tests our faith in democracy. We realize people have made the laws Ecology professes to follow, but legal interpretation tangles mean all life affected by Rayonier mill operations continue to be harmed. Some have said they know decisions will only be made by lawyers.

We urge those given this opportunity to do the right thing — for the sake of the proverbial seven generations and for the thousands of more years ahead when people can experience the satisfaction possible because at this point in time we gave back for the great privilege of living here.

People of our area — including Rayonier and its investors — can be known for the kind of community vision that opened up the Elwha River to its historic spawning and other habitat areas. Wouldn't that be better than trying to keep people and other life safe from fenced-off contaminants and breaches from sea-level rise, earthquakes, tsunamis and extreme weather that exceed what fences can control?

Our family is doing everything we can for the fish of Ennis Creek. We celebrate the community that is becoming increasingly aware of the need to give back for getting to live here.

It is very concerning that Ecology's preferences aren't supporting the community spirit we value.



Do we want to say, as the verse about paving paradise and putting up a parking lot ends:

“Don't it always seem to go

That you don't know what you got 'til it's gone?”

Robbie Mantooth

Co-founder, Friends of Ennis Creek