

Paul Pickett

My comments are in the attached document.

August 10, 2025

FROM: Paul J. Pickett, Port Angeles WA

TO: Marian Abbett, Site Manager, Washington Department of Ecology

CC: Casey Sixkiller, Director of the Department of Ecology

Comments on Rayonier Mill Cleanup Plan

Core message

Ecology needs to clean up the Rayonier mill site to the Option 5 level – the highest level of clean-up. Detailed comments follow.

Written comments provided at Ecology's Port Angeles meeting

(in case you had trouble reading my handwriting 😊)

Ecology has a remarkable opportunity to “renature” the Port Angeles waterfront. I worked for Ecology for over 30 years as an environmental engineer, mostly in EAP. I moved here several years ago. Almost immediately, I discovered the Olympic Discovery Trail and adopted a section as a volunteer steward. As such, I ride my bicycle through this area regularly. It is a remarkable area with so much potential to restore its natural capital and environmental services. It has cultural importance – the former location of a Native American village. It has importance as the mouth of Ennis Creek, the most important salmon stream between the Elwha River and Morse Creek. It has waterfront and nearshore marine habitat or priceless value. I call this “renaturing” because we have an opportunity to create a magnificent natural area. This would be an investment in our community. It also represents this area’s shift from a mill economy to a tourist and retirement economy. I’m sure I speak for my son and his wife, their children, and many other local businesses and residents. We need the best cleanup possible. Ecology should require the highest level of restoration. Rayonier can afford it. The community and our environment need it. Leave no toxic materials on the site. Complete removal is necessary. Do this for us, and for future generations.

Detailed comments

- I support the Port Angeles City Council decision supporting Option 5.
- Ecology needs to factor into its cleanup cost analysis all impacts to fish, wildlife, the environment and human health. It should also factor in the benefits of a complete site restoration to community and Tribal culture and values.
- Ecology should include in its analysis the risks at this site to disturbance. The site is close the shore and there are significant and probable hazards at this location, including earthquake, tsunami, and ocean inundation from high tides and storm waves. A storm from the north a couple years ago overtopped and blew out the berm along the Olympic Discovery Trail a short distance to the east. This is not a stable location, rather it is a dynamic shoreline bordering a large exposed ocean waterbody. This reality supports a full cleanup, not just a coverup of soils and sediments. Remove all contaminated soils and sediments from the site.
- Risks increase with time due to the inevitable impacts of climate change and sea level rise, and the natural process that will cause deterioration of the site. If contaminated soils and sediment are left

on the site, monitoring will need to continue indefinitely, not just for 30 years. This is a cost to be included. Also repair to the site in the indefinite future needs to be included in your analysis.

- Your analysis needs to include short- and long-term protection of the environment and public health. Rayonier can afford this cleanup, so Option 5 is not just providing the most benefit, it is also financially feasible to the responsible party.
- Ensure Ennis Creek is restored to its original shape and given space to allow the connectivity and natural dynamics essential for a salmon stream. This includes restoring the brackish water zone at the mouth of Ennis Creek. All benefits of fully restoring the mouth of Ennis Creek should be included in Ecology's analysis.
- Ecology needs to support returning this area to its natural state to attract and support upland wildlife and connect it with the wildlife corridor to the east towards Sequim and Jefferson County. These benefits should be included in the analysis.
- Other aspects of the cleanup to consider:
 - Remove all soils from the remaining concrete pad built hundreds of feet over the Harbor on fill that once held Rayonier's pulp mill.
 - Do not pile onto the concrete pad toxic sediments or wharf infrastructure; send these to appropriate hazardous waste landfills.
 - Remove the concrete pad and restore the original shoreline now under the foundation
 - As soon as possible relieve remove that dock pilings covered with creosote that is harmful to fish and other marine life.
- Ecology needs to ensure the Natural Resource Damage Assessment parties complete their work for cleaning up and providing other restoration for federal resources contaminated by the Rayonier Pulp Mill. These decision makers include NOAA, USFWS, the Lower Elwha Klallam Tribe, the Jamestown S'Klallam Tribe.
- Any remaining polluted areas, in particular any upland areas need to be surrounded with solid and high fencing along with large signs that fully inform the public of the cleanup and the importance of staying off the site.
- Ecology needs to ensure that the public is updated as the cleanup moves forward. In addition, Option 3 would require regular updates of site conditions, while Option 5 allows minimal monitoring and reporting. These are additional costs to consider.

Thank you for consideration of my comments.

