

Clallam County Democrats (Ellen Menshew)



August 12, 2025

Ms. Marian Abbett – Site Manager
WA Department of Ecology
Olympia, WA

Re: Public comments – former Rayonier Mill site – Port Angeles, WA

Dear Ms. Abbett,

The Clallam County Democrats (CCD), affirm our unwavering commitment to wise environmental stewardship in accordance with our adopted Party Platform. As stated therein, *“Restrictions on practices by individuals or corporations should be in accordance with protecting and conserving our environment or repairing degraded areas. We support environmental restoration and protection.”* In upholding these values, CCD has consistently collaborated with our local, state, and federal elected officials, tribal partners, and state agencies to facilitate these goals.

It has been almost thirty years since the Rayonier Mill site was razed, leaving behind more than 4,000 creosote pilings and a legacy of contaminants that continue to leach toxins into the Port Angeles harbor and its environs. During this time, CCD members and other dedicated local advocates have actively participated in restoring the Ennis Creek area, remarkably resulting in a return of salmonids to its waters—a testament to the power and necessity of restoration. But populations of the stream’s dominant Coho salmon and threatened steelhead have been diminishing over recent decades.

On July 8, 2025, at the Department of Ecology (DOE) presentation held at the Field Arts & Events Hall in Port Angeles, public comment was clear and resounding: the community overwhelmingly supports a total cleanup of the former mill site. With the estimated cost for comprehensive remediation projected at \$25 million, DOE officials referenced the Model Toxics Control Act (MTCA) and its requirement to weigh cleanup costs against projected benefits. We are deeply concerned that the DOE, citing these provisions, is considering a lesser option involving only partial removal and covering remaining contaminants with fabric and such materials as gravel, sand, and soil. Former mill operator Rayonier would be delegated to monitor periodically for leaks. This proposed approach raises serious questions regarding value, accountability and efficacy. There are no calculations including commercial and cultural value of the fish that could be damaged by leaving contaminants when calculating costs of removal versus benefits—it evokes the troubling image of the fox guarding the henhouse.

When the will of the people is so clearly in favor of a full cleanup, we believe it is imperative to lend our voices in support of Option 5 – total cleanup, removal of all toxic waste, and remediation at this site. Going forward, we will work with our elected officials to ensure that laws must evolve to reflect not only economic calculations, but our collective values and vision for the future.

Our community deserves action that reflects both scientific best practices and the expressed will of its citizens.

On July 11, 2025, the Clallam County Democrats unanimously passed Resolution No. 2025-09 (attached), supporting total cleanup at the former Rayonier Mill site. We see Option 5 as the only path forward to ensure the health and well-being of current and future generations in our community. We urge you to negotiate a full settlement with Rayonier, and its subsidiaries, to ensure this outcome.

Sincerely,

A handwritten signature in cursive script that reads "Ellen Menshew".

Ellen Menshew
Chair, Clallam County Democrats
clallamdemschair@gmail.com

Resolution for Public Comment on Port Angeles Rayonier Mill Cleanup

Resolution 2025-09

Whereas The Washington State Department of Ecology has established this current period until 11:59 p.m., August 12, 2025, for public comment on the proposed action plan for environmental cleanup at the Port Angeles Rayonier property where industrial pollution has occurred for over 100 years; and (1)

Whereas The Clallam County Democrats' Mission includes promoting wise environmental stewardship, including Clean Air and Clean Water and it is important that we stand up and have our voices counted (2); and

Whereas Investigations by U.S. Environmental Protection Agency and Washington Department of Ecology have revealed that dangerous chemicals and sediments exist at levels of concern and pose a risk to marine and wildlife, humans and the environment (3); and

Whereas Democrats believe it is in the best interest today to build a healthy environment, respect the humans, wildlife and marine creatures that historically will follow us inhabiting our land, waters, air and forests. (4)

THEREFORE, BE IT RESOLVED that the Clallam County Democratic Party (CCD) unequivocally demands removal of all contaminants from the Upland Study Area and transport of contaminated materials to an appropriate disposal site such as one in Eastern Oregon; and

BE IT FURTHER RESOLVED that CCD calls upon The State Department of Ecology to modify its Interim Action Report to require such removal; and

THEREFORE, BE IT FINALLY RESOLVED that this Resolution be adopted by the Clallam County Democrats and distributed to the State Department of Ecology administration, Washington Governor Bob Ferguson and our representatives in Congress and the State Legislature.

Submitted by: Robbie Mantooth, and Bill Biery - Clallam County Democrats

Adopted: July 11, 2025, by the membership of the Clallam County Democrats



References

1 Public Comments Welcomed

<https://ecology.wa.gov/spills-cleanup/contamination-cleanup/cleanup-sites/puget-sound/port-angeles-harbor/rayonier-mill>

² Clallam County Democrats' Mission

<https://www.clallamdemocrats.org/mission.html>

3 Contaminants in the upland and marine areas

ecology.wa.gov/rayonier page 3,

In the upland area, soil and groundwater are impacted by:

- Polycyclic Aromatic Hydrocarbons (PAHs)
- Polychlorinated Biphenyls (PCBs)
- Dioxins
- Ammonia
- Metals: Such as arsenic, iron, lead, zinc, thallium, copper, manganese, and nickel
- Total Petroleum Hydrocarbons (TPH): Diesel and heavy oils
- Elevated pH: Impacting groundwater quality

In the marine area, marine sediments and animal tissue are impacted by:

- Polycyclic Aromatic Hydrocarbons (PAHs)
- Polychlorinated Biphenyls (PCBs)
- Metals: Such as arsenic and lead
- Dioxins
- Phenols
- Phthalates
- Woody debris: May impact habitat and water quality

Contaminants pose a risk to human health through direct contact with contaminated materials or by eating fish and shellfish exposed to these substances. (Department of Ecology Publication 25-09-092, page 3)

4 Washington Model Toxics Control Act

(MTCA) Chapter 173-340 WAC Cleanup Standards

<https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305&full=true>

<https://ecology.wa.gov/regulations-permits/laws-rules-rulemaking/closed-rulemaking/wac-173-340>

Washington State Department of Ecology publication 94-06

<https://ecology.wa.gov/regulations-permits/laws-rules-rulemaking/closed-rulemaking/wac-173-340>