



EXPLORE, ENJOY, AND PROTECT THE PLANET.

Michael Brune, Executive Director
Sierra Club
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Oakland, CA 94612

Gina McCarthy, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Portland Harbor Superfund Cleanup

Dear Administrator McCarthy,

Core to our mission at the Sierra Club is protecting the planet from harmful pollution. The Sierra Club has over 4,500 dues-paying members and over 44,000 supporters in Multnomah County alone, as well as over 17,000 dues-paying members in the state of Oregon.

The EPA's preferred cleanup plan for the Portland Harbor Superfund site on the Willamette River is insufficient to protect the environment or the health of the people who recreate in, live near, or consume fish from the area. The EPA preferred option, Alternative I, would remove only 8% of the polluted sediment area, leaving unacceptable levels of PCBs, dioxins, DDT, PAHs, and other pollutants in the river. As a result, fish residing in the harbor would remain unsafe to eat for generations.

As you know, the Yakama Nation has said that the current plan would violate their 1855 treaty with the federal government, in particular their fishing treaty rights. Local environmental justice groups and groups of color have also said that insufficient outreach to their groups appears to constitute racial discrimination under Title VI of the Civil Rights Act. In addition, an environmental justice analysis of the Portland Harbor Site has been completely overlooked (see Duwamish ROD Section 6.1, 10.3.3, and 13.2.8).

Cleaning the river would provide benefits for the local economy and has potential to provide enormous benefits to underprivileged communities. A 2012 analysis by ECONorthwest showed that cleaning the river would inject millions of dollars into the Portland economy and create hundreds of jobs. Each dollar spent on the cleanup would generate more than a dollar in return locally. Our environmental justice partners envision creating cleanup jobs for local underprivileged communities who have been suffered harm from the river contamination – Native Americans, African-Americans, immigrants and refugees, and people experiencing houselessness.



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We join the Yakama Nation and other allies to request that the EPA implement Alternative G, with the following modifications:

1. Provide a cleanup that results in fish that are clean, healthy and safe for all to eat.
2. Prevent the release of contaminated sediments into the Columbia River by more aggressively dredging contaminated sediments.
3. Include a clear plan for monitoring the success of cleanup activities with a contingency cleanup plan if natural remediation proves insufficient towards meeting cleanup goals.
4. Protect shorelines, nearshore habitat, and communities residing nearshore.
5. Include an evaluation of upland pollution source control and provide assurances for upland source control in order to protect the river from ongoing and recontamination.
6. Remove all Principal Threat Waste (PTW) and eliminate the use of an on-site, in-water Confined Disposal Facility (CDF) to reduce risk in the event of an earthquake or change in water level due to climate change or extreme weather.
7. Comply with State water quality and hazardous substance remedial action rules for risk.
8. Meet threshold requirements for protectiveness including Clean Water Act standards.
9. Allow Tribal Nations an oversight role in the cleanup process.
10. Leave the responsibility for implementing cleanup with the EPA, not the State of Oregon.
11. Collect baseline data on soil, air, water, and fish contamination as soon as possible. Require independent monitoring throughout the remediation period until clean, healthy levels are achieved.

This is a critical decision-making juncture that we must get right. Join us in our vision of a clean river with fish safe for all to eat.

Sincerely,

Michael Brune
Executive Director
Sierra Club